

September 5, 2025

Attention: Gurpreet Chatwal
Ken & Associates
110 Matheson Blvd. W, Suite 120
Mississauga, ON LR 4G7

SLR Project No.: 244.024383.00002

Client Reference No.: 2201701

Revision: 0

**RE: Scoped Environmental Impact Study Addendum for 20 Cairns Crescent,
Town of Huntsville, ON**

SLR Consulting (Canada) Ltd. ('SLR', then Palmer) submitted a Scoped Environmental Impact Study (EIS) on behalf of Ken & Associates for the property at 20 Cairns Crescent in the Town of Huntsville ('Subject Property') that was dated April 3, 2023. This memo addresses the comments made by the Town of Huntsville and the public (dated November 1, 2024) in response to the EIS submission (**Section 1**). Relevant policies, existing environmental conditions and the proposed development were all summarized in the 2023 EIS. However, updates to the zoning by-law were required as per the Town's Comment #26. In addition to this, since the original 2023 submission, there have been updates to the proposed development plan that will be summarized in **Section 2.3** below. Existing environmental condition updates, following an August 7, 2025 field survey, are also summarized in **Section 2.2** below.

1.0 Environmental Impact Study Comments

1.1 Town of Huntsville Comments

The following two (2) comments were made by the Town of Huntsville. SLR ecologists have provided a response for each comment below.

Comment #26: *The report only references the former Zoning By-law and not the Community Planning Permit By-law (CPPBL). Please revise to include references to the CPPBL.*

This is addressed in **Section 2** below.

Comment #27: *The report references that all existing vegetation is to be removed. Please confirm that there is to be vegetation retention and revise.*

Some trees will be retained within the maple hardwood (G058Tt) forest. This is discussed further in below in **Section 3.2.1**.

1.2 Public Comments

In total, there were six (6) comments made by the public concerning wildlife habitat and tree clearings.

Comment #13: *While the applicant suggests minimal deer activity was observed on the single day they attended the property, we as local residents can attest to frequent deer sightings within the property. The applicant also identified a number of Species at Risk located within the property but seem to suggest no substantial mitigation measures to protect their habitat. As local residents and concerned citizens, we would request the town consider requiring a peer review of the Scoped Environmental Impact Assessment conducted by the applicant's consultant.*

The response is broken down into two sections: (1) Deer habitat and (2) Species at risk habitat.

- (1) While deer may use forests for movement, deer targeted surveys were conducted by SLR (then Palmer) to determine if deer wintering habitat was present. Deer habitat is categorized as Stratum 1 (summer range, core wintering areas) and Stratum 2 (winter staging areas). As stated in Section 2.2 of the EIS:

“As stated in Section C1.4.4: Significant Wildlife Habitat of the Town's OP:

C1.4.4.2 Deer Wintering Habitat

- a) *Winter deer habitat can be identified as areas of Stratum 1 and Stratum 2 habitat. Stratum 1 represents the core habitat where deer concentrate in mid-winter once snow depth generally exceeds 50 cm and deer movement is restricted. Stratum 2 habitat generally surrounds Stratum 1 habitat. Deer occupy both Stratum 1 and Stratum 2 areas when they begin to concentrate prior to periods of deep snow, late in winter when deer supporting crust conditions occur, or during unseasonably mild winters with low total snow accumulation.*“

As mentioned in the EIS, no direct evidence (i.e., deer sightings) was found but indirect evidence (ex. scat, browse, bedding) was found in the Dry to Fresh, Coarse: Maple Hardwood (Sugar Maple/Balsam Fir) (G058Tt). While it is acknowledged that deer will use this area, as stated in the comment, the quantity of indirect evidence found during the winter survey did not support the classification as Stratum 2.

- (2) Mitigation measures for SAR were outlined within Section 7.3.1 of the EIS. Mitigation measures for SAR include the use of timing windows which will mean avoiding impacts during critical and sensitive life periods (nesting, roosting, etc.). These mitigation measures are consistent with federal and provincial requirements.

Comment #23: *And they will strip the land of trees. If what was allowed to happen on the hill overlooking Fairy Lake that you see driving down Town Line Rd toward Brunel is any example of what not to allow or had the foresight about what the developers would do to build their fortresses then the town planners did not learn very well from that ugly mistake.*



It is recognized that there are substantial tree removals, but this is within the urban boundary and within residential development boundaries. Tree removals are necessary to complete requirements of the development (grading, servicing, etc.). However, following these activities, a landscape restoration plan will be used for native tree plantings. This is outlined in the submitted reports by Kuntz Forestry Consulting Inc. Furthermore, there are trees that are proposed to be retained along the south side of the property.

Comment #47: *b. Negative impact on the wildlife - Bears (we already had many bears in town this year), deer, moose, fox, wild turkeys, squirrels, rabbits, migratory birds (ducks/geese), amphibious creatures and other marsh habitants. All these animals (and more) have been seen in this area!*

Following study requirements outlined by the Town of Huntsville, the requested ecological surveys were conducted to determine the ecological impact of the proposed development. Proper mitigation measures have been recommended in order to reduce impacts to these species (Section 7 of the EIS).

Comment #51: *Cascade Lane is a friendly, quiet, pleasing community that is surrounded by beautiful hardwood trees teaming with song birds, raptors, deer, moose, bear and many species of small mammals.*

Based on the retained areas in the south end of the property, some degree of tree cover and general wildlife habitat opportunities will still be retained following the completion of the development. Wildlife habitat continues to be available in the off property in the surrounding landscape and forest to the south.

Comments #55: *Clearing the land will destroy wildlife habitat and destroy the scenic beauty that surrounds us. Building of that size and nature will affect our property value as well as safety within Cascade Lane and neighboring homes.*

While we understand your concern, general wildlife habitat will be available within the retained tree cover in southern area of the property and in the overall landscape to the south.

Comment #79: *Would like to see maybe a couple of trees planted on the front side of the building for curb appeal.*

Landscape plantings, which will be comprised of native species found in this area, have been included in the proposed plans. This will not only provide curb appeal but be present for use by wildlife.



2.0 Environmental Impact Study Updates

2.1 Zoning By Law

In the 2023 EIS, the Subject Property was zoned as “Residential Four (R4)” under the Town of Huntsville Zoning By-law (Town of Huntsville, 2019a) which has specific permitted uses associated with it (Section 3.3 of the Town’s Official Plan). However, a newer by-law (Community Planning Permit By Law, CPPBL), was passed by town council on July 25, 2022 and consolidated on May 16, 2025 (Town of Huntsville 2025). The zoning for the Subject Property is still R4 and the same permitted uses apply. No amendments for natural heritage features were made for the Subject Property area (Town of Huntsville 2025; Town of Huntsville, 2019b).

2.2 Existing Conditions

Additional vegetation information was gathered during the August 7, 2025 site visit and the survey allow for the further identification of plants with in the meadow area in the north including Tufted Vetch (*Vicia cracca*), Tall Hairy Agrimony (*Agrimonia gryposepola*), and Grass-leaved Goldenrod (*Euthamia graminifolia*). There were 19 additional plant species noted within the G058Tt community including Intermediate Woodfern (*Dryopteris intermedia*), Canada Mayflower (*Maianthemum canadense*), and Interrupted Fern (*Osmunda claytoniana*).

A defined drainage feature was located within the western portion of the Subject Property. The feature had no standing or flowing water present at the time of the survey, although, presence of plant species that prefer wet environments (such as Black Ash) were noted in greater abundance in the vicinity of this feature. This feature likely conveys flows following significant events such as snowmelt or heavy rainfall and conveyance of flows from the lands to the south. The feature begins as undefined drainage from the southwestern portion of the property, becoming more defined where the slope is less steep.

2.2.1 Black Ash (*Fraxinus nigra*) in Subject Property

During the 2025 site visit, a total of 80 Black Ash trees greater than 8 cm DBH were noted. These trees were located within the vicinity of the drainage feature in the western side of the Subject Property. These trees were noted as relatively healthy during the time of survey. Black Ash is listed as Threatened in Ontario, however, the Town of Huntsville is outside the regulated limit for Black Ash, and therefore, no protections are afforded for this species.

2.2.2 Snag (Bat Habitat) Trees

A total of six additional snag trees were located during the 2025 site visit. The majority of these trees were located in the eastern portion of the Subject Property outside of the established snag survey plots surveyed for the 2023 EIS. All identified snag trees are potentially located within the development limit. The snag density for the G058Tt community is now calculated to be 6.17 snags/ha, below the recognized threshold of 10 snags/ha denoting good quality bat habitat. Vegetation removal for construction works could affect maternal roosting bats protected under the Endangered Species Act (ESA) as bat habitat trees were present on the Subject Property. For the protection of bats during their active period, tree removals must be completed outside of the maternal bat roosting window (April 1 – November 30 of any calendar year) in order to not to remove potentially active bat habitat based on guidance from the MNR’s *Species at Risk Bats Survey Note 2022* (MNR 2022). Therefore, any vegetation and tree removals should be



completed between **December 1st – March 31st**. To provide for habitat enhancement, it is recommended that one artificial bat habitat structure (e.g., Rocket Box) be installed in the area of retained trees in the south of the property (**Appendix A**) (Bat Conservation International, N.d.).

2.3 Proposed Development

2.3.1 Maple Hardwood (G058Tt) Retention

As mentioned above in the response for the Town's comment #27, trees within the southern region of the G058Tt community will be retained. Some trees along the western border will also be retained. This can be viewed in the updated **Figure 3**.

2.3.2 Site Plan

Since the original EIS submission, a new site plan was developed (**Figure 3**). Revisions include (but are not limited to):

- the movement of the proposed building to the southeast.
- a reduction in parking spaces and units
 - Originally there were 229 parking spaces proposed but now 211 are proposed.
 - In the original submission, there were 183 units proposed, but this is now down to 176 units.
- the stormwater management pond placement.
 - The updated plans have proposed a stormwater management pond northeast of the proposed building.

3.0 References

Bat Conservation International (BCI). N.d. Two-chamber Rocket Box. Retrieved from <https://batcon.org/wp-content/uploads/2020/04/RocketBoxPlans.pdf>

Ministry of Natural Resources (MNR). 2022. Species at Risk Bats Survey Note 2022.

Town of Huntsville. 2025. Community Planning Permit By Law 2022-97. May 2025 Consolidation.

Town of Huntsville. 2019a. Huntsville Zoning By-law 2008-66P. September 2019 Consolidation.

Town of Huntsville. 2019b. Town of Huntsville Official Plan. Adopted March 2019.



Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for Ken & Associates (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

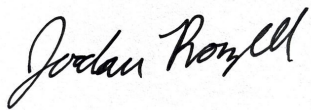
Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.

Closure

We trust that this memo satisfies your current requirements and provides suitable documentation for your records. If you have any questions or require further details, please contact SLR.

Regards,

SLR Consulting (Canada) Ltd.

A handwritten signature in black ink that reads "Jordan Roszell".

Jordan Roszell, M.Sc
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A handwritten signature in black ink that reads "Dirk Janas".

Dirk Janas, B.Sc
Technical Director – Terrestrial Ecology
dirk.janas@slrconsulting.com

Attachments: Figure 1 Site Location
 Figure 2 Existing Environmental Conditions
 Figure 3 Development Plan
 Appendix A – Rocket Bat Box Plans



Figures

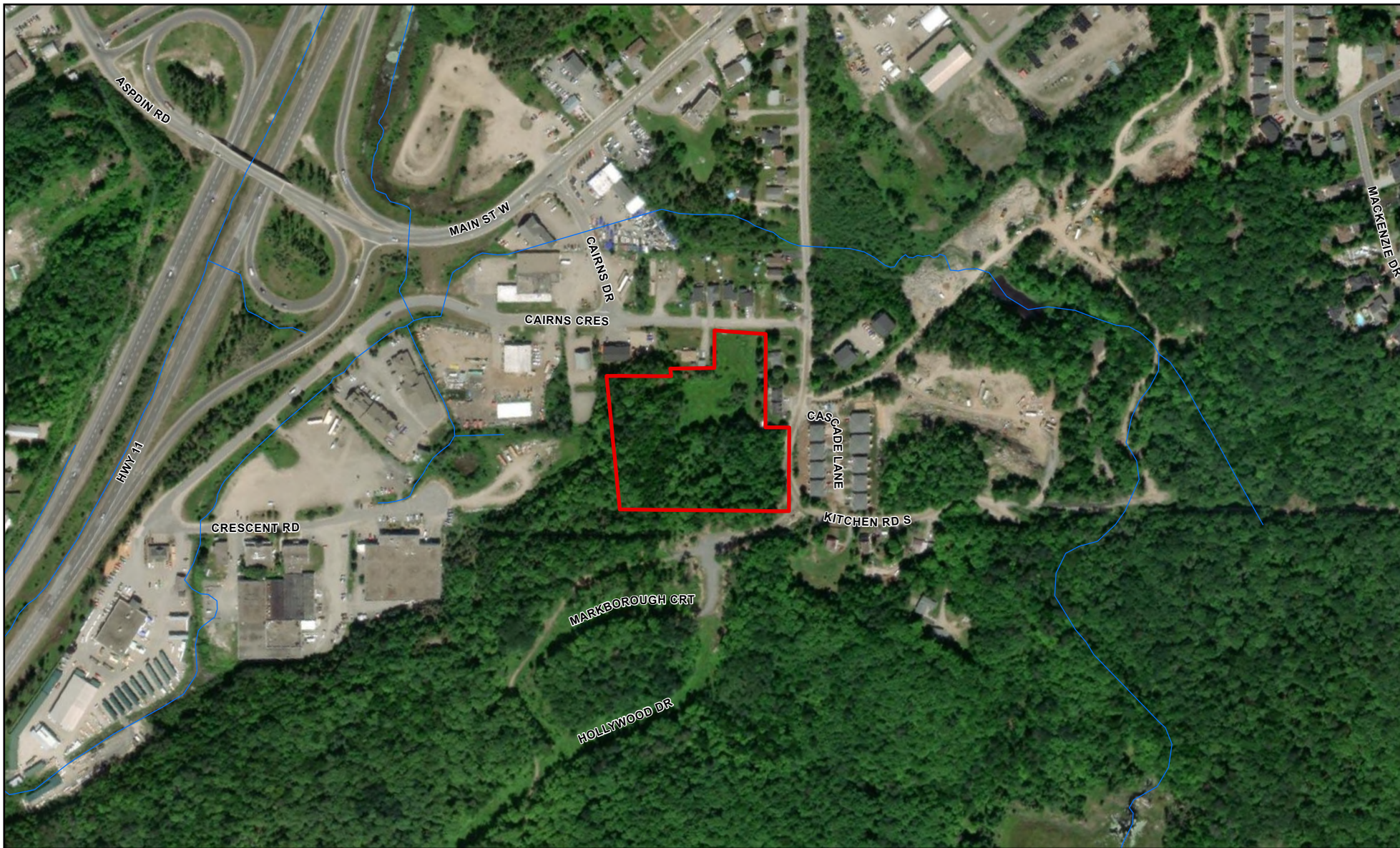
Scoped Environmental Impact Study Addendum








20 Cairns Crescent, Huntsville, ON

Ken & Associates

SLR Project No.: 244.024383.00002

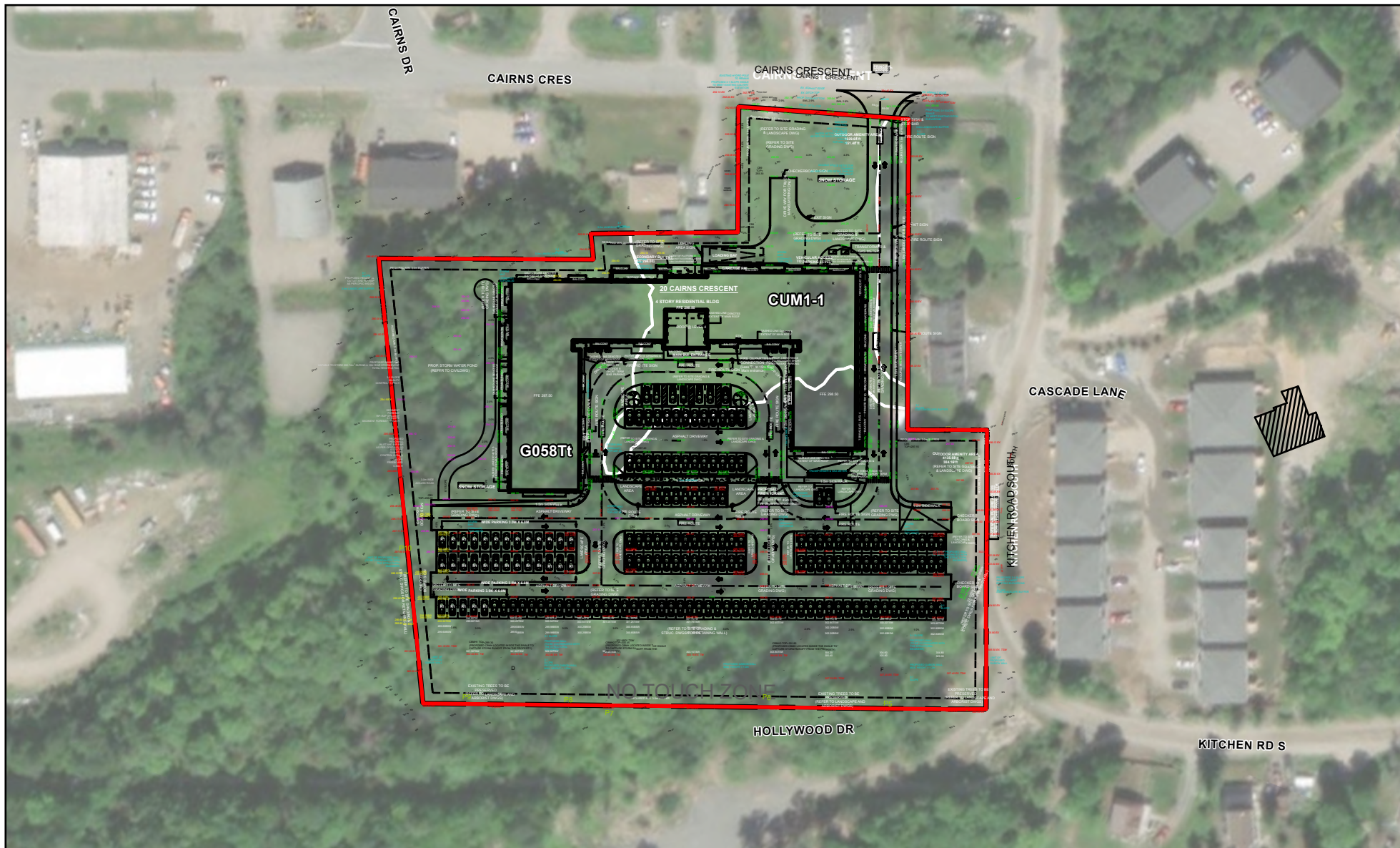
September 5, 2025



<p>LEGEND</p> <p> Watercourse (OHN)</p> <p> Subject Property (2.1 ha)</p>	<p>DRAFT</p> <p>Key Map</p> 	<p>0 100 200 METRE SCALE</p> <p>North American Datum 1983 Universal Transverse Mercator Projection Zone 17</p> <p>Scale: 1:5,000 Page Size: Letter (8.5 x 11 inches)</p> <p>Drawn: SM Checked: RA Date: Aug 20, 2025</p> <p>Source Notes: Base imagery (2020) provided by ESRI basemapping services.</p> <p> NORTH</p>	<table border="1"> <tr> <td>CLIENT</td> <td>Gurpreet Chatwal</td> </tr> <tr> <td>PROJECT</td> <td>20 Cairns Crescent, Huntsville Scoped EIS</td> </tr> <tr> <td>TITLE</td> <td>Site Location</td> </tr> <tr> <td>REF. NO.</td> <td>2201701-1-1</td> </tr> <tr> <td colspan="2">  </td> </tr> <tr> <td colspan="2"> Figure 1 </td> </tr> </table>	CLIENT	Gurpreet Chatwal	PROJECT	20 Cairns Crescent, Huntsville Scoped EIS	TITLE	Site Location	REF. NO.	2201701-1-1			Figure 1	
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<div>LEGEND</div> <div><div><div></div><div>Plot Centre</div></div><div><div></div><div>Snag Trees</div></div><div><div></div><div>ELC Community</div></div><div><div></div><div>Subject Property (2.1 ha)</div></div></div> <div><div><div>ELC Legend</div><div>CUM1-1: Dry – Moist Old Field Meadow</div><div>HR: Hedgerow</div><div>G058Tt: Dry to Fresh, Coarse: Maple Hardwood (Sugar Maple/Balsam Fir)</div></div></div>		<div><div>DRAFT</div><div><div><div><div>01020304050</div><div>METRE SCALE</div></div><div><div>North American Datum 1983</div><div>Universal Transverse Mercator Projection Zone 17</div><div>Scale: 1:1,500</div><div>Page Size: Letter (8.5 x 11 inches)</div><div><div>Drawn: SM</div><div>Checked: RA</div><div>Date: Aug 20, 2025</div></div></div><div><div><div></div><div>NORTH</div></div></div><div><div>Source Notes: Base imagery (2020) provided by ESRI basemapping services.</div></div></div></div></div>	<div><div><div><div>CLIENT</div><div>Gurpreet Chatwal</div></div><div><div>PROJECT</div><div>20 Cairns Crescent, Huntsville Scoped EIS</div></div><div><div>TITLE</div><div>Existing Environmental Conditions</div></div><div><div><div><div><div></div><div>SLR</div></div></div><div><div>REF. NO.</div><div>2201701-2-3</div></div><div><div>Figure 2</div></div></div></div></div></div>
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<div><div><div></div><div>ELC Community</div></div><div><div></div><div>Development Plan</div></div><div><div></div><div>Subject Property (2.1 ha)</div></div></div>	<div>ELC Legend</div> <div>CUM1-1: Dry – Moist Old Field Meadow</div> <div>HR: Hedgerow</div> <div>G058Tt: Dry to Fresh, Coarse: Maple Hardwood (Sugar Maple/Balsam Fir)</div>			



Appendix A Rocket Bat Box Plans

Scoped Environmental Impact Study Addendum

20 Cairns Crescent, Huntsville, ON

Ken & Associates

SLR Project No.: 244.024383.00002

September 5, 2025

Two-chamber Rocket Box

Materials (makes one house)

2" diameter (2 $\frac{3}{8}$ " outside diameter) steel pole, 20' long
Two 1" x 4" ($\frac{3}{4}$ " x 3 $\frac{1}{2}$ " finished) x 8' boards*
Two 1" x 8" ($\frac{3}{4}$ " x 7 $\frac{1}{4}$ " finished) x 8' boards*

* Western red cedar
or poplar preferred

Two 1" x 10" ($\frac{3}{4}$ " x 9 $\frac{1}{4}$ " finished) x 6' boards*
24" x 24" x $\frac{3}{4}$ " piece of AC exterior plywood
Box of 100 exterior-grade screws, 1 $\frac{1}{2}$ "
Box of 100 exterior-grade screws, 1 $\frac{1}{4}$ "
16 to 32 exterior-grade screws, 2"

20 to 30 roofing nails, $\frac{7}{8}$ "

One quart water-based primer, exterior grade
Two quarts flat, water-based stain or paint,
exterior grade

Asphalt shingles or dark galvanized metal

One tube paintable latex caulk

Two $\frac{1}{4}$ " x 4 $\frac{1}{2}$ " carriage bolts, washers and nuts

Recommended tools

Table saw or circular saw

Caulk gun

Hammer

Tape measure

Square

Jigsaw, keyhole saw or router

Sandpaper or sander

Rasp or wood file

Variable-speed reversing drill

1 $\frac{1}{2}$ " hole saw or spade bit

$\frac{1}{8}$ " and $\frac{1}{4}$ " drill bits

Screwdriver bit for drill

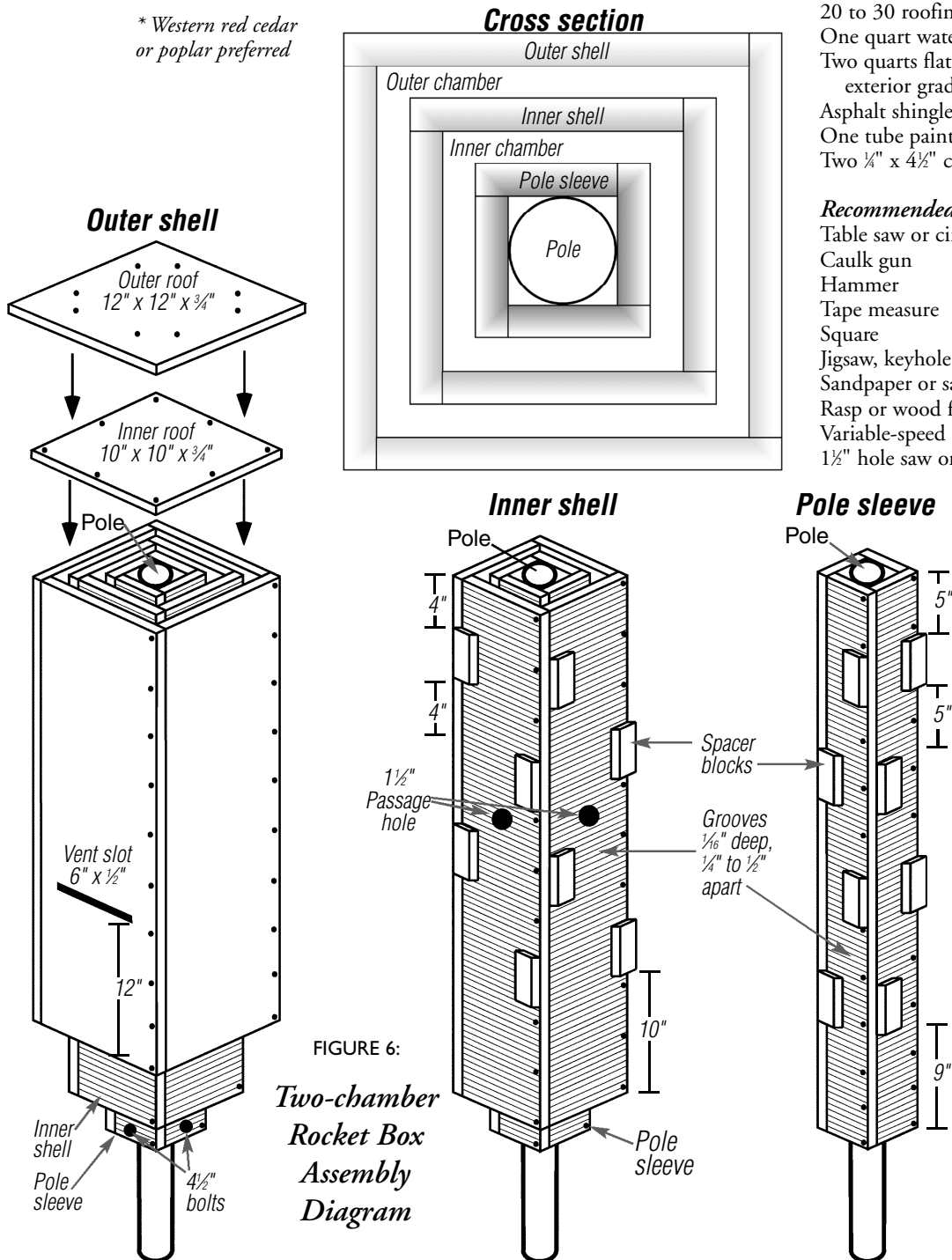


FIGURE 6:

*Two-chamber
Rocket Box
Assembly
Diagram*

Construction

1. Measure, mark and cut out parts according to Figure 7. Dimensions must be exact for correct fit. Cut out two vent slots and four passage holes as shown.
2. Cut $\frac{1}{8}$ "-deep horizontal grooves $\frac{1}{4}$ " to $\frac{1}{2}$ " apart on one side of all 36" and 45" boards and on both sides of all 42" boards. Sand to remove splinters.
3. Drill two $\frac{1}{8}$ " holes through each $\frac{3}{4}$ " x 1 $\frac{1}{2}$ " x 4" spacer block to prevent splitting.
4. Assemble four pole sleeve boards into a hollow, square box as shown using 1 $\frac{1}{2}$ " screws and caulk. Pre-drill holes to prevent splitting. Countersinking holes may also help.

5. Attach spacer blocks to pole sleeve as shown (four per side) using two 1/4" screws per block. Bottom spacer blocks are 9" up from bottom of pole sleeve. Top spacer blocks are 5" from top. Alternate spacer blocks on left and right sides, 5" apart.
6. Assemble four inner shell boards into a hollow, square box as in step 4.
7. Slide pole sleeve into inner shell until top edges are flush. Bat passage holes will be towards the top. Mark location of spacer blocks. Secure inner shell to pole sleeve with 2" screws through the spacer blocks to ensure no screws protrude into roosting chambers. Pre-drill holes first to avoid splitting spacer blocks (countersinking holes may also help).
8. Attach spacer blocks (4 per side) to inner shell as shown, using two 1/4" screws per block. Bottom spacer blocks are 10" up from the bottom edge of the inner shell. Top spacers are 4" from top. Alternate spacers left and right sides, 4" apart.
9. Assemble four outer-shell boards into a hollow, square box as in step 4. Vent slots are on opposing sides and oriented towards the bottom.
10. Slide finished outer shell over inner shell, so that 6" of inner shell protrudes below outer shell. Mark locations of spacer blocks. Secure outer shell to inner shell as in step 7 (pre-drill holes first). Ensure that no screws protrude into the roosting chambers.
11. Caulking first, attach inner roof to box with 1/4" screws. Carefully drive screws into top edges of shells to prevent screws from entering roosting chambers.
12. Center and attach outer roof to inner roof with 1/4" screws, caulking first.
13. Paint or stain exterior three times (use primer for first coat). Cover roof with shingles or dark galvanized metal.
14. Slide completed rocket box over pole. One inch up from the bottom edge of pole sleeve, drill a 1/4" hole all the way through pole and sleeve. Rotate box and pole 90° and drill another 1/4" hole, 2 inches from the bottom, through pole and sleeve. Secure box to pole with two 4 1/2" bolts, washers and nuts. Orient vent slots north and south during installation.

Optional modifications to the rocket box

1. For extra mounting height, insert a 4 1/2" bolt and nut about halfway up through pole sleeve after completing step 5.
2. For extra heat-holding capacity, create a compartment in upper half of pole sleeve with a 2 1/2"-square piece of leftover plywood. Fill upper half of sleeve with sand, gravel or dirt, and seal with another piece of plywood flush with top.
3. In warmer climates, a larger outer roof with more overhang can be used for additional shading.

2' x 2' x 3/4" AC plywood

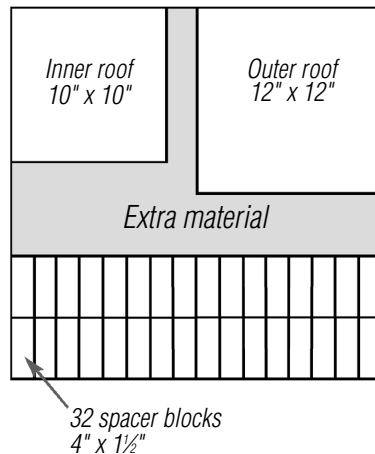
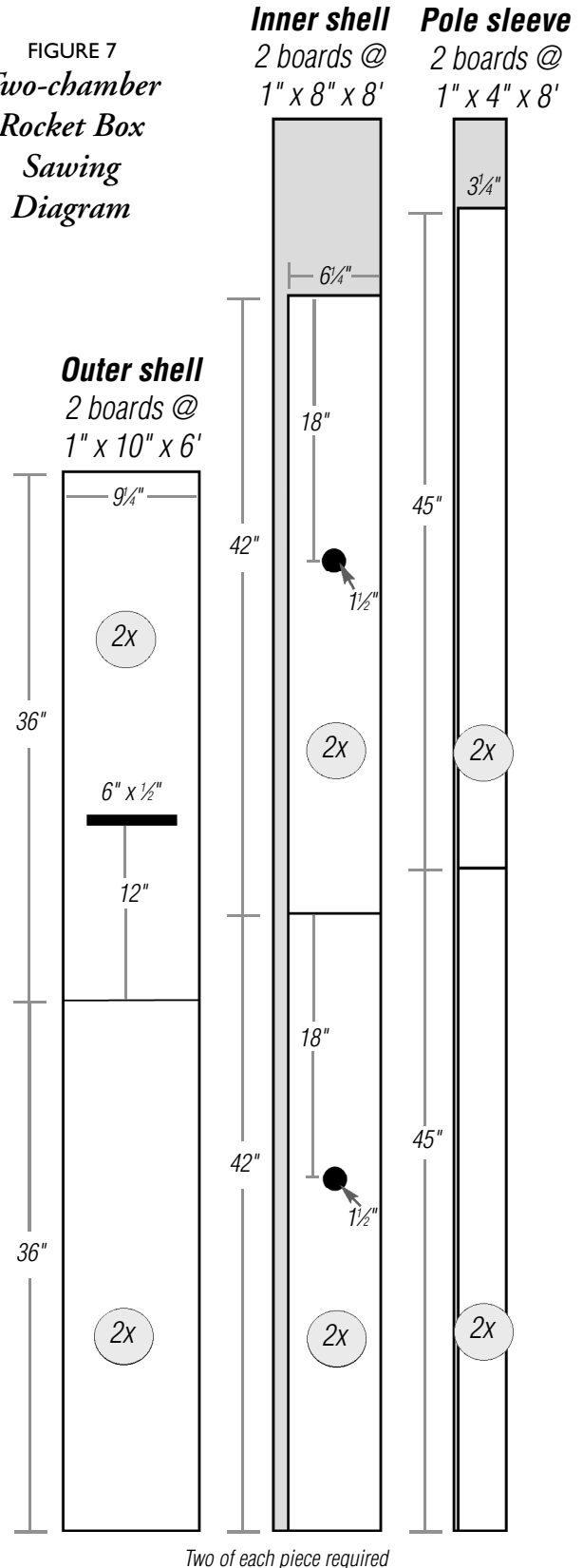
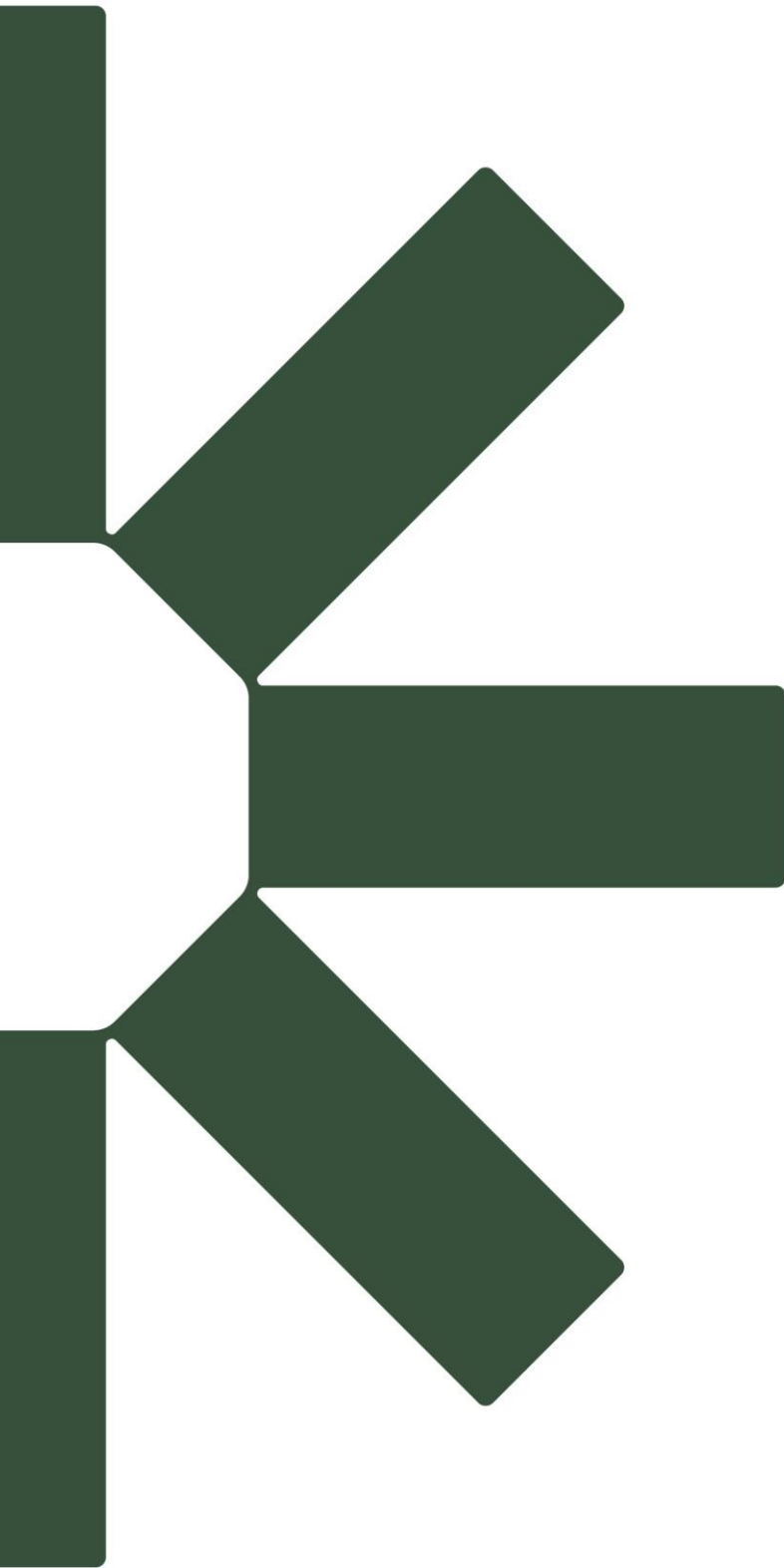


FIGURE 7
*Two-chamber
Rocket Box
Sawing
Diagram*





Making Sustainability Happen