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VIA EMAIL

October 21, 2026 File No. 17546-2

2522082 Ontario Inc.
240 Chrislea Road, Suite 125
Woodbridge, Ontario
L4L 8V1

Attn: **Mr. Del Terrelonge**

Ref: **Significant Woodlands Review – Comment Response Letter**
Adolphus Reach Resort – Zoning By-law Amendment Application (Third Submission)
1315, 1329, and 1357 County Road 7, Ward of North Marysburgh, Prince Edward County

Dear Mr. Terrelonge:

Ainley & Associates Limited (Ainley Group) was retained by 2522082 Ontario Inc. to complete a review of potential impacts to significant woodlands at the subject property – identified as Adolphus Reach Resort and located at 1315, 1329, and 1357 County Road 7, Ward of North Marysburgh, Prince Edward County, and to provide a response to third submission Zoning By-law Amendment Application comments provided by Prince Edward County Development Services Department and dated July 23, 2026. It is understood that the Department has reviewed and circulated the third submission application package, which included the 2021 Environmental Impact Study completed by Ainley Group, and subsequently has provided comments that are required to be addressed.

Specific comments to be addressed as part of this letter are outlined below in italics, with the associated Ainley Group response provided in plain text. An updated servicing plan is included as **Attachment 1**.

COMMENTS AND RESPONSE

4. *Section 3.1.4.7 of the Official Plan states that "Development shall not be permitted within woodlands identified in **Schedule 'B': Natural Features & Areas** or any significant woodlands identified during the planning process through criteria in the Ministry of Natural Resources and Forestry's Natural Heritage Reference Manual, unless the ecological function of the woodland has been evaluated through an Environmental Impact Study (EIS) that demonstrates, to the satisfaction of the County, in consultation with any other agency having jurisdiction, that there will be no negative impacts on the woodlands or on their ecological functions"*

a. *A woodland is illustrated along the shore of this property. Please advise how the Pump House or sewage system (private utilities) would not negatively impact this feature. As they are located directly within the woodland. The Policy requires the completion of an EIS to review the ecological function of the woodland and ensure there are no negative impacts on the woodland or ecological function.*

In order to supplement existing conditions information collected at the subject property as part of the previously completed EIS, Ainley Group completed a site visit on September 9, 2026 to review the characteristics of the woodland features identified along the shoreline of the property within the above referenced planning document.

With regard to significant woodlands, Ainley Group has undertaken a detailed review / interpretation of the potential for impacts to woodlands and their ecological function as a result of the proposed pump house and sewage system. This review is based on the characteristics of significant woodlands provided in the MNR's *Natural Heritage Reference Manual* (*NHRM*; 2010), which include; woodland size, woodland interior, proximity to other woodlands / habitats, linkages, water protection, woodland diversity, uncommon characteristics, and economic / social functional values.

A description of potential impacts associated with each of the proposed Pump House and sewage system in reference to the above noted woodland characteristics is provided below.

Pump House and Associated Utilities

A new pump house is to be constructed within a maximum footprint size of 15 m^2, and will provide water to the proposed development through a 200 mm distribution pipe. The location of the pump house is proposed to be located within an area dominated by White Cedar (*Thuja occidentalis*), with trees typically less than 25 cm diameter at breast height (DBH). Ground cover in the area of the footprint was observed to largely consist of Dog-strangling Vine (*Vincetoxicum spp*). The proposed location is immediately west of an existing cottage and shed, and abuts an existing stair case that extends down the escarpment to the water. Utilities (i.e. piping) are anticipated to extend from the water, to the pumphouse (approximate distance of 7 m), and then run east through the White Cedar dominated forest (approximate distance of 13 m), and continuing past the existing cottage and following the existing access road. It is anticipated that any utilities associated with the Pump House would be installed via long-stick excavator or mini excavator from the top of slope, access road, or barge (if necessary). Based on information from the design engineer, the utilities will require a 6 m wide strip of vegetation clearing resulting in an area of clearing of approximately 270 m^2 within the identified woodland feature. Erosion and sedimentation associated with areas of clearing and excavation will be controlled using geotextile or erosion matting, with vegetation restoration proposed to include native grasses and shrub species.

Woodland Size

The mapped woodland feature present along the shoreline of Adolphus Reach appears to extend for approximately 12 km, and varies in width from approximately 45 m to 500 m. Given the size of the Pump House footprint (15 m^2) and proposed location of utilities (largely following existing disturbed areas, with modest clearing requirement of approximately 270 m^2), any

clearing required is interpreted to be negligible within the overall woodland feature, and is not anticipated to result in any negative impacts to woodland size.

Woodland Interior

Within the area of the proposed Pump House, the woodland feature is approximately 80 m in width. Per the *NHRM*, interior habitat is that which is greater than 100 m from the woodland edge. Given the width of the woodland within the area of the proposed Pump House, interior habitat is not present, and therefore will not be negatively impacted.

Proximity to Other Woodlands / Habitats

The woodland is noted to be adjacent to Adolphus Reach (Lake Ontario), and provides shading along the nearshore area of this feature. While a small amount of clearing is anticipated to be required to accommodate the footprint of the proposed Pump House and associated utilities, the footprint for the work will be minimal, thereby maintaining the existing nearshore shading provided by the woodland. As such, there is no anticipated negative impact to the benefits provided to Adolphus Reach by the woodland as a result of the proposed Pump House development.

Linkages

Per the information within Schedule "B" of the Official Plan, the subject property does not fall within a natural core area, or associated natural core area linkage. Based on the current design, the proposed Pump House will have a minimal footprint and will incorporate a setback that is generally consistent with the existing cottage dwelling and shed. It is interpreted that any wildlife which may be moving east and west along the escarpment slope will remain able to do so under the proposed development condition. As such, there are no anticipated negative impacts to linkage as a result of the proposed Pump House.

Water Protection

Based on a review of the Ministry of Environment, Conservation, and Parks' *Source Protection Atlas*, the subject property is considered to fall within a highly vulnerable aquifer. However, it is understood that the Pump House will draw water from Adolphus Reach, and will not require installation of a water supply well. No other source protection features (i.e. groundwater recharge area, wellhead protection area, etc.) are mapped as being present on the subject property.

Further, overland flow which may currently follow the escarpment to Adolphus Reach is not anticipated to be impacted by the proposed Pump House and will continue with consistent inputs.

Based on the above, there are no anticipated negative impacts to water protection function provided by the woodland, as a result of the proposed Pump House.

Woodland Diversity

During the completion of the 2026 (and previous) site visit, no rare vegetation (or that who's numbers have significantly declined) was observed within the area of the proposed Pump House. Further, ground cover species were observed to largely consist of invasive species (Dog-strangling Vine). As such, no negative impacts to woodland diversity characteristics are anticipated as a result of the proposed Pump House.

Uncommon Characteristics

The vegetation community (White Cedar – Sugar Maple Mixed Forest) present in the area of the proposed Pump House was is not considered to be uncommon or rare. During the 2026 site visit, it was noted that several older Sugar Maples are present along the escarpment slope; however, none are anticipated to be present within the footprint of the proposed Pump House or associated utilities. Further, as noted previously, vegetation in the area of the proposed Pump House is generally 25 cm DBH or less, suggesting that it is younger. Based on the above, no negative impacts to uncommon characteristics are anticipated as a result of the proposed Pump House.

Economic / Social Functional Values

As noted previously, the footprint of the proposed Pump House is located within an area dominated by White Cedar, which is not noted to have any particular economical value. With regard to social value, the property is noted to be under private ownership which largely limits the social value that it can provide. Social value that may be present includes its landscape view from the water; however, given the limited footprint (and associated clearing requirements) of the proposed Pump House and utilities, it is not anticipated to have any negative impacts on social functional values which may be present.

Sewage System

The sewage system footprint within the identified woodland feature includes the placement of a 200 mm sanitary pipe. It is understood that all wastewater treatment will occur on the south side of the resort development. The sanitary piping will extend through a semi-open area dominated by Staghorn Sumac (*Rhus typhina*), along the edge of the existing access road and further downslope through a mixture of deciduous and coniferous tree species such as Basswood (*Tilia americana*), White Cedar (*Thuja occidentalis*), and Sugar Maple (*Acer saccharum*), among other species. The footprint required for the sanitary pipe is anticipated to include a narrow strip through the mapped woodland feature. It is anticipated that the sewage system will require an area of vegetation clearing approximately 6 m wide, with a resulting anticipated vegetation clearing area of approximately 270 m^2 within the identified woodland feature. Erosion and sedimentation associated with areas of clearing and excavation will be controlled using geotextile or erosion matting, with vegetation restoration proposed to include native grasses and shrub species.

Woodland Size

As noted previously, the mapped woodland feature present along the shoreline of Adolphus Reach appears to extend for approximately 12 km, and varies in width from approximately 45 m to 500 m. The narrow strip of vegetation clearing (anticipated to be 270 m^2) required to accommodate the sanitary piping is interpreted to be negligible within the overall woodland feature, and is not anticipated to result in any negative impacts to woodland size.

Woodland Interior

Within the area of the proposed sewage system, the woodland feature is approximately 45 m in width. Per the *NHRM*, interior habitat is that which is greater than 100 m from the woodland

edge. Given the width of the woodland within the area of the proposed sanitary piping, interior habitat is not present, and therefore will not be negatively impacted.

Proximity to Other Woodlands / Habitats

The woodland is noted to be adjacent to Adolphus Reach (Lake Ontario), and provides shading along the nearshore area of this feature. As noted previously, a narrow strip of vegetation clearing is anticipated to be required to accommodate the sanitary piping; however, this is anticipated to have a negligible effect on nearshore shading. As such, the existing nearshore shading provided by the woodland will remain, and there is no anticipated negative impact to the benefits provided to Adolphus Reach by the woodland as a result of the proposed sanitary piping.

Linkages

Per the information within Schedule "B" of the Official Plan, the subject property does not fall within a natural core area, or associated natural core area linkage. Based on the current design, the proposed sanitary piping will have a minimal footprint and will not infringe on any east-west movement of wildlife along the escarpment, as it will be buried. As such, there are no anticipated negative impacts to linkage as a result of the proposed sanitary piping.

Water Protection

Based on a review of the Ministry of Environment, Conservation, and Parks' *Source Protection Atlas*, the subject property is considered to fall within a highly vulnerable aquifer. However, the sanitary piping will not require installation of a water supply well or drawing of water from this aquifer. No other source protection features (i.e. groundwater recharge area, wellhead protection area, etc.) are mapped as being present on the subject property.

Further, overland flow which may currently follow the escarpment to Adolphus Reach is not anticipated to be impacted by the proposed sanitary piping installation and will continue with consistent inputs.

Based on the above, there are no anticipated negative impacts to water protection function provided by the woodland, as a result of the proposed sanitary piping installation.

Woodland Diversity

During the completion of the 2026 (and previous) site visit, no rare vegetation (or that who's numbers have significantly declined) was observed within the area of the proposed sanitary piping. As such, no negative impacts to woodland diversity characteristics are anticipated as a result of the proposed sanitary pipe installation.

Uncommon Characteristics

The vegetation community (White Cedar – Sugar Maple Mixed Forest) present in the area of the proposed sanitary piping was is not considered to be uncommon or rare. Further, no older trees (i.e those likely to be 100 years of age or greater) were observed along the escarpment slope in the area of the proposed sanitary piping. Based on the above, no negative impacts to uncommon characteristics are anticipated as a result of the proposed sanitary piping.

Economic / Social Functional Values

As noted previously, the footprint of the proposed sanitary piping is located within an area of mixed (coniferous and deciduous) species, with no single high-value species present in large quantities. With regard to social value, the property is noted to be under private ownership which largely limits the social value that it can provide. Social value that may be present includes its landscape view from the water; however, given the limited footprint (and associated clearing requirements) of the proposed sanitary piping, it is not anticipated to have any negative impacts on social functional values which may be present.

b. *The EIS does not reference the woodland identified in Schedule "B" of the Official Plan or address the policy of development within woodlands. Please refer to Section 6.6.3 of the EIS which states that no significant woodlands have been identified and therefore no anticipated impacts are expected.*

Based on the timing of the EIS (June 2021), it was prepared in consideration of the previously approved County of Prince Edward Official Plan (Approved: December 23, 1998, Office Consolidation: January 2011) and its associated schedules. This Official Plan did not make specific reference to significant woodlands. As such, the *Proposed Natural Heritage Strategy for Consideration by the Municipalities and First Nations of the Bay of Quinte Region* (Lower Trent Conservation, 2015) was utilized to determine if significant woodlands were proposed for the subject property. No significant woodlands were identified within the subject property or surrounding area in this document. It is understood that a new Official Plan was approved in 2021, with an effective date of July 8, 2021 (after submission of the EIS). It is understood that Schedule "B" of the new Official Plan identifies woodland (>40 ha) along the shoreline (escarpment feature) of the subject property. The response to comment 4a addresses the policy of development within woodlands.

c. *This policy should be addressed through the Zoning by-law Amendment Application.*

Noted. To be completed by the developer's planning consultant.

d. *Please note that this policy was revised as per OPA No. 2 (By-law 115-2023).*

Noted. It is understood that this By-law allows for development within significant woodlands provided it is supported by an EIS.

CLOSURE

We trust the above provides suitable information to Prince Edward County in response to their comments dated July 23, 2026 associated with the third submission Zoning By-law Amendment Application for the proposed Adolphus Reach Resort. Should there be any further questions regarding the above, please do not hesitate to contact the undersigned.

Sincerely,

David Davison, B.Sc. (Env),
Senior Environmental Planner

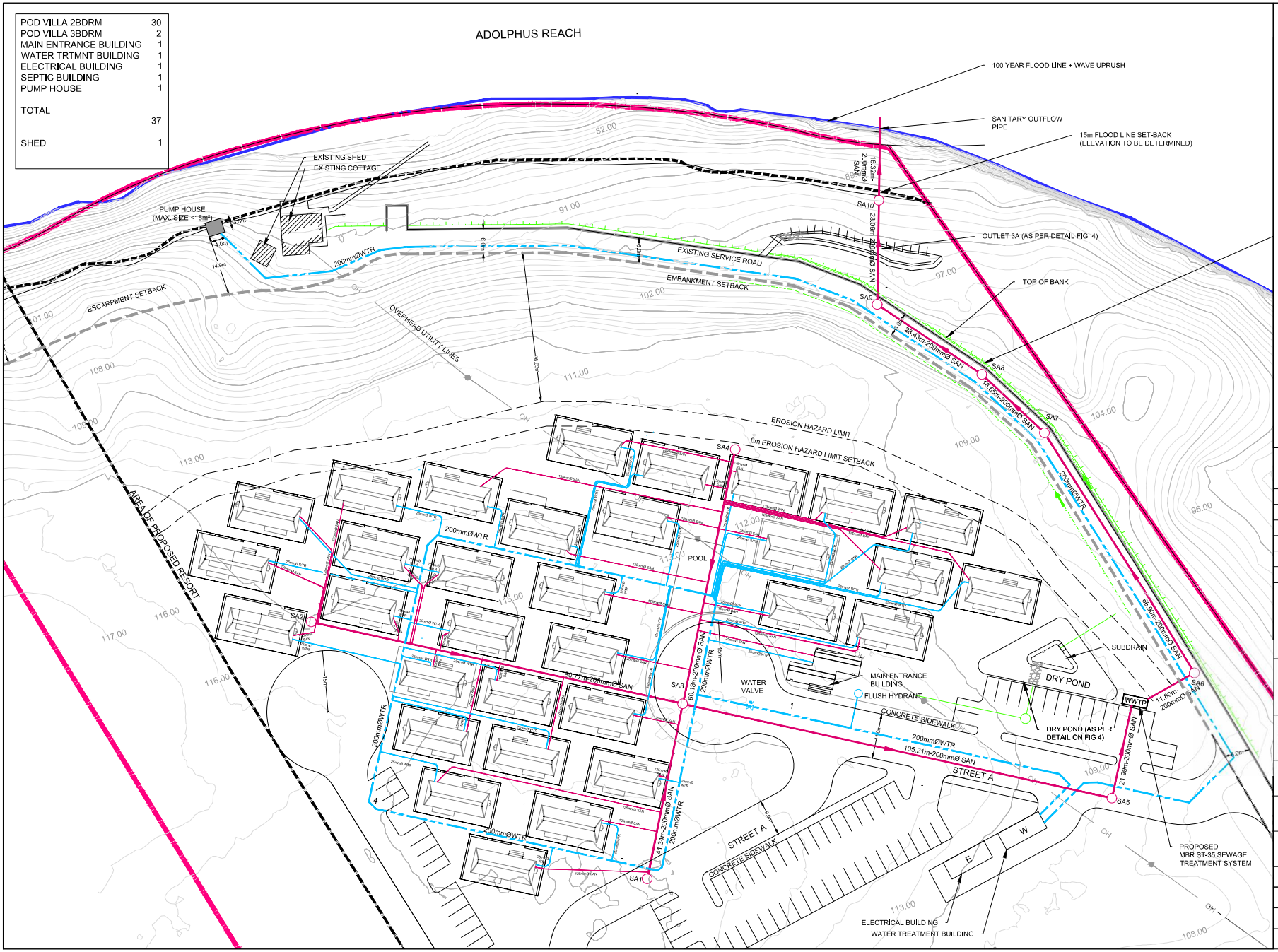
Scott Reynolds, B.Sc. (Env), EP
Manager of Environmental Planning

ATTACHMENT 1

Updated Servicing Plan

POD VILLA 2BDRM	30
POD VILLA 3BDRM	2
MAIN ENTRANCE BUILDING	1
WATER TRTMNT BUILDING	1
ELECTRICAL BUILDING	1
SEPTIC BUILDING	1
PUMP HOUSE	1
TOTAL	37
SHED	1

ADOLPHUS REACH



LEGEND

- PROPERTY LINE
- PROPOSED STORMWATER
- PROPOSED SWALE
- PROPOSED SANITARY
- PROPOSED WATERMAIN

0 5 10 m H=1:400

No.	Revision Issue	Date
R3	AS PER AGENCY COMMENTS	DECEMBER 2025

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Client: 2522082 ONTARIO INC.

Project: ADOLPHUS REACH RESORT

Drawing: PRELIMINARY SERVICING PLAN

Drawn by: CE | Checked by: KMB | Project No.:
Designed by: CMH | Approved by: KMB | Drawing No.: FIG.2
Date: JUNE 2026
Scale: 1:400 (ANSI D)