



Town of South Bruce Peninsula

PO Box 310, 315 George St.
Wiarton ON N0H 2T0

Tel: (519) 534-1400 Fax: (519) 534-4976
Toll Free (in 519 area only): 1-877-534-1400

March 5, 2018

Bill Walker, MPP
Bruce-Grey-Owen Sound
920 1st Ave. West, Suite 100
Owen Sound, Ontario
N4K 4K5

Dear MPP Walker:

Re: Sauble Beach Maintenance

The Town of South Bruce Peninsula has been actively pursuing acceptance by the Ministry of Natural Resources & Forestry to undertake beach maintenance at Sauble Beach. In recent years Sauble Beach has seen the nesting of Piping Plovers (*Charadrius melanotos*) on our beach.

The Town has recognized the significance of this endangered species and has with cooperation from local groups supported efforts to protect this species. Unfortunately, the Town is now in a position that the direction of Ministry staff is too restrictive and is prohibiting the Town's ability to undergo routine maintenance of the beach.

Sauble Beach receives hundreds of thousands of visitors each year. We get approximately 40,000 visitors on weekends and this increases to approximately 60,000 visitors during summer long weekends. The local economy is 100% driven by the attraction of Sauble Beach as a recreational beach.

Since 2011, the Town has had a "Raking and Maintenance of the Sand Beach at Sauble Beach" policy. We have always maintained a buffer area between the beach dune system and our maintenance activities.

Over the years significant vegetation growth has occurred on what the Town would consider to be the flat portion of the beach area. The Town is highly concerned that this vegetation growth is such that it is impacting or eliminating the recreational use of the beach.

The Town wishes to undertake spring maintenance prior to the arrival of any Piping Plover. This work would consist of the tilling of the sand and subsequent raking to remove the vegetation prior to the arrival of the Piping Plover. Failure to undertake this important spring maintenance will result in significantly more vegetation growth.

This effort would then allow for less disturbance during the nesting period of a Piping Plover. We would then in the fall, after the Piping Plover have left, return to undertake maintenance to remove vegetation.

We believe our efforts are support by scientific literature which supports our position that the Piping Plover prefer sand flats with little or no vegetation. This includes the following citations:

1. Piping Plover & Beach Habitat in Nova Scotia, Bird Studies Canada, <https://www.bsc-eoc.org/volunteer/nsplover/NSPIPLeco.pdf>; Quote: "*Piping Plovers nest on wide sand, gravel, or cobble beaches, barrier island sandspits, or peninsulas in marine coastal areas. Early successional habitat, most often free of dense vegetation, is preferred for nest sites.*"
2. Piping Plover (Charadrius melanotos), Connecticut Department of Energy & Environmental Protection, http://www.ct.gov/dep/cwp/view.asp?a=2723&q=326062&depNav_GID=1655; Quote: "*Beach stabilization projects have reduced the quality of the remaining sites, forcing the birds to nest in areas with greater vegetation and increased human disturbances. Vegetation provides cover for, and human activities encourage the presence of, predators such as dogs, cats, rats, raccoons and skunks. In addition, human disturbances affect productivity by keeping birds off nests, thus preventing them from attending eggs and young.*"
3. Piping Plover, Canadian Wildlife Federation, <http://www.hww.ca/en/wildlife/birds/piping-plover.html?referrer=https://www.google.ca/>; Quote: "*Areas without vegetation and with good visibility are ideal for nesting;*"
4. Piping Plover Fact Sheet, New York State Department of Environmental Conservation, <https://www.dec.ny.gov/animals/7086.html>; Quote: "*Piping Plovers breed on dry sandy beaches or in areas that have been filled with dredged sand, often near dunes in areas with little or no beach grass.*"
5. Description of Residence for Piping Plover (Charadrius melanotos, circumcinctus and melanotos subspecies) in Canada, http://www.sararegistry.gc.ca/virtual_sara/files/rd_Piping_Plover_0505_e.pdf; Quote: "*Piping Plovers establish their nests on sand, pebble, gravel and cobble beaches, barrier islands, sandspits or peninsulas found in marine coastal areas. Occupied beaches are generally wide and most often with sparse vegetation.*"
6. Piping Plover Habitat Restoration Project, St. Louis River Alliance,



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<http://stlouisriver.org/piping-plover-habitat-restoration-project/>; Quote: "Habitat – Piping Plovers use wide, flat, open, sandy beaches with very little grass or other vegetation."

7. All About Piping Plovers, U.S. Fish & Wildlife Service, <https://www.fws.gov/plover/facts.html>; Quote: "Great Lakes Piping Plovers breed on sparsely vegetated beaches, cobble pans, or sand spits of sand dune ecosystems along the Great Lakes shorelines."
8. Piping Plover Life History, Indiana Dunes, The Cornell Lab of Ornithology, <https://www.fws.gov/plover/facts.html>; Quote: "*They nest above the high water line in sandy areas with sparse vegetation including marshes, ocean shores, bays, spoil islands, reservoirs, alkali lakes, and rivers.*"

Our observation support his conclusion as the Piping Plover nests in 2017 were all located in the sparsely vegetated areas of the beach.

We are requesting your assistance to obtain the Ministry of Natural Resources & Forestry to support the Town of South Bruce Peninsula's beach maintenance efforts including:

- Sand cultivation to remove vegetation in the spring prior to the arrival of any Piping Plover;
- Routine beach raking to keep the beach clean outside of an agreed upon distance while the Piping Plover are nesting; and
- Sand cultivation to remove vegetation in the fall after the departure of any Piping Plover.

We thank you for your assistance is this urgent and important matter.

Yours truly,

A handwritten signature in cursive ink that appears to read "Janice Jackson".

Janice Jackson
Mayor