

September 16, 2021

Mayor Guthrie and Members of Council  
City of Guelph  
c/o Stacey Laughlin, Senior Policy Planner  
1 Carden Street,  
Guelph, ON  
N1H 3A1

Dear Mayor Guthrie and Members of Council:

**RE: DRAFT CLAIR-MALTBY SECONDARY PLAN  
PUBLIC MEETING SUBMISSION  
OUR FILE: 17285B**

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Our client, Options for Homes, are the purchasers of the southern portion 2162 Gordon Street, in the City of Guelph (hereinafter referred to as the "Subject Lands") under an Agreement of Purchase and Sale. Options for Homes is one of Canada's largest developers who are working exclusively on making home ownership more affordable for Canadians. Operating for over 25 years without government grants, Options for Homes is a mission-driven social enterprise that turns home ownership dreams into reality.

### **Background**

The Subject Lands are located in the southern quadrant of the Clair-Maltby Secondary Plan ("CMSP") area. The Subject Lands are approximately 35 acres (14 ha) in size with frontage along Gordon Street as shown in **Figure 1** attached hereto.

The Subject Lands are part of a larger parcel of land owned by the Foundation for the Support of International Medical Training ("FSIMT"). Since December 2014, Options for Homes has had an agreement of purchase with the FSIMT. The agreement to purchase the Subject Lands is to facilitate the development of a significant affordable home ownership project.

Options for Homes has been actively involved in the CMSP process to ensure its interests in developing the lands for affordable home ownership can be achieved. Options for Homes have invested a significant amount of time and resources to participate in the CMSP process since the beginning, including being a member of the Community Working Group for the CMSP.

As a part of the Secondary Plan process, Options for Homes have provided written comments to the City on January 2, 2019, May 13, 2019, October 11, 2019, December 4, 2019, February 28, 2020, and March 2, 2020, in relation to the Community Structure alternatives and preferred option. Options for Homes also provided delegations to Council to request changes to the Community Structure plan and the location of

the proposed Community Park. Through Council's direction on the Community Structure plan and the development of the Open Space System Strategy for the CMSP, a revised Community Structure has addressed many of the concerns raised regarding the ability of Options for Homes to maximize affordable housing options across the Subject Lands.

### **Comments on Draft Secondary Plan and Supporting Studies**

Following the release of the Draft Secondary Plan and the supporting technical reports in June 2021, Options for Homes and its team of consultants has attended the City's virtual workshops and have reviewed the draft reports and materials posted.

Based upon the review of the Draft Secondary Plan, the Subject Lands are identified as '*Residential*' and '*Natural Heritage System/Moraine Ribbon*' and feature a '*Stormwater Capture Area*' and '*Potential Elementary School*' on Schedule A. Schedule A also identifies a portion of the Subjects Lands within the Gordon Street Corridor. The Subject Lands are further designated as '*Medium Density Residential*,' '*Low Density Greenfield Residential*,' and '*Clair-Maltby High Density Residential*' on Schedule B with a very small portion of land designated at '*Mixed Use*' and '*Open Space and Park*'. Additionally, Schedule C provides for a Mobility Plan that includes an '*Essential Active Transportation Route*' which transects the site and also connects to the north and '*Collector Road*' Street D to the southwest corner of the Subject Lands. Schedule C also illustrates a Multi-Use Overpass that to the west of the Subject Lands across Gordon Street. Schedule D identifies areas that are '*Preferred Moraine Ribbon Location*' and '*Essential Active Transportation Link*'. Within the Subject Lands identified Natural Heritage System on Schedule E, both '*Significant Natural Areas*' and '*Ecological Linkages*' are identified with a wildlife crossing over Gordon Street to the west.

The Servicing and Phasing Plans as provided in the Master Environmental Servicing Plan ("MESp") identify the Subject Lands as being in Phase 4 and provide for the partial location of an elementary school site as well as a centrally located stormwater capture zone and conceptual stormwater management facility. There is also a maintenance hole location adjacent to Gordon Street.

Based on the project team's initial review of the draft schedules and policies, we offer the following comments. We would also appreciate an opportunity to meet with staff to discuss our comments and present proposed revisions to the schedules and policies to address the concerns noted in efforts to maximize Guelph's opportunity for affordable housing

#### Vision, Guiding Principles and Objectives

The overall vision, guiding principles, and objectives of the Draft Secondary Plan are well stated and clearly reflect the need to balance the objectives of providing for a full range and mix of housing types including affordable and market-based housing together with meeting the City's environment-first housing approach. This is critically important in relation to the need for the City to address the current housing supply issues and the housing crisis faced by municipalities in Ontario. In terms of meeting housing affordability targets and needs, it will be important for Council to commit to the implementation of the CMSP in the most efficient and timely way so as not to delay the ability to bring affordable housing online without unnecessary additional processes and approvals.

## Managing Growth and Community Structure

The stated target for overall density within the CMSP is 65 residents and jobs per hectare with a population planned to 2051 of 16,300 residents and 1,250 jobs. Within the Gordon Street Corridor, the planned population is for 4,100 residents and 500 jobs. Given the significant amount of development directed along the Gordon Street Corridor, we would ask for confirmation that the proposed densities within the corridors can achieve the identified growth target. If modelling has been undertaken by staff, it should be provided to illustrate how the minimum growth targets are met. It should also be noted that the opportunity for frontage and development along Gordon Street on the Subject Lands is essentially removed by the expansive Natural Heritage System designation which is addressed further in our comments.

### Density

The proposed designations on the Subject Lands contemplate a range of residential densities including the following:

Section 11.3.8.6.2.3 - Low Density Greenfield Residential permits the following:

- Detached, semi-detached, duplex dwellings, and multiple unit residential buildings such as townhouses and apartments.
- Maximum height of 6 storeys.
- Maximum net density of 60 units per hectare and a minimum net density of 20 units per hectare.

Section 11.3.8.6.3 - Medium Density Residential permits the following:

- Multiple unit residential buildings such as townhouses and apartments.
- Minimum permitted height of 2 storeys and maximum height of 6 storeys.
- Maximum net density of 100 units per hectare and a minimum net density of 35 units per net hectare.

Section 11.3.8.6.4 - Clair-Maltby High Density Residential permits the following:

- Multiple unit residential buildings generally in the form of apartments.
- Within the Gordon Street Corridor, a minimum height of 4 storeys with the maximum heights denoted in schedule D. In this case the maximum height is limited to 8 storeys.
- Outside of the Gordon Street Corridor, a minimum height of 3 storeys and a maximum height of 10 storeys is permitted.
- Maximum net density of 250 units per hectare and a minimum net density of 100 units per hectare.

Section 11.3.8.6.5 – Mixed Use permits the following:

- Multiple unit residential buildings generally in the form of apartments along with commercial, office and institutional uses;
- Within the Gordon Street Corridor, a minimum height of 4 storeys with the maximum heights denoted in schedule D. In this case the maximum height is limited to 8 storeys.
- Maximum net density of 250 units per hectare and a minimum net density of 100 units per hectare.
- A minimum FSI of 1.5.

Both the Low Density Residential and Medium Density Residential designations provide for a range of residential forms. The height limits in the Low Density Residential designation provide for a wide range of forms and provide for the control of transition between ground related and low-rise forms of development through policies. The 6-storey height cap in the Medium Density Residential designation and additional

density caps are overly prescriptive. Many mid-rise developments with smaller units would result in higher densities than prescribed (100 units per site hectare) which would then require an Official Plan Amendment to facilitate development which cannot occur for two years and would create delays and add to the cost of providing affordable housing. The current combined density and height policies do not align to provide for optimized development based on our initial assessment of the developable areas within the Subject Lands. It is recommended that the Medium Density Residential designation provide for heights up to 8 storeys and include more flexible policies that may allow for additional height and density based on specific locational criteria (transit road frontages) and built form criteria to address compatibility and impact.

We would also request that the Low Density Residential designation on the Subject Lands be changed to Medium Density Residential to allow for additional height and density in this area of the site.

The High Density Residential designation provides for up to ten storeys in height outside of the Gordon Street Corridor and a maximum density of 250 units per hectare with a minimum Floor Space Index ("FSI") of 1.5. The Subject Lands are the only site located in the High Density Residential designation and have limited access to Gordon Street, as a result of the expansive Natural Heritage System designation and crossing which constrains the Gordon Street lands. Again, based on our assessment of the developable lands within the Subject Lands that are designated High Density Residential, the current combined density and height policies do not align to provide for optimized development that could achieve the maximum density.

A very small portion of the Subject Lands appears to be located in the Mixed Use designation and is within the Gordon Street Corridor. However, these lands would be developable at a lesser height than the lands outside the Corridor. The portion of the lands designated Mixed Use is also constrained and lacks frontage to Gordon Street, again based on the expansive Natural Heritage System designation. This should be further assessed and reconsidered to allow for a developable parcel with frontage along the Gordon Street Corridor.

We agree that densities and heights along the Gordon Street Corridor should provide for the greatest heights and densities in the CMSP area. Particularly as it relates to the Subject Lands, in order to maximize affordable housing and development along the Arterial Road, heights and densities should be controlled through built form policies that transition development away from the corridor. Heights should not be prescribed to transition from 14 to 8 and then to 10 storeys. A reconsideration of the designations and policies on the Subject lands is appropriate to provide for flexibility and an appropriate transition.

It is not clear from the policies proposed if the proposed densities are based on a gross or net hectare basis and if private or public roads are excluded or included in the density calculations. Clarification on the density calculations should be provided.

### Natural Heritage Systems

The Gordon Street Corridor in which a portion of the Subject Lands is located is predominantly designated for as Natural Heritage Systems ("NHS"). It is a key goal of the Secondary Plan is to develop an urban transit-supportive and multi-modal corridor and it is suggested that the detailed refinements to the NHS be completed as part of the implementing zoning for the Secondary Plan to ensure compact urban design intended throughout the Gordon Street Corridor can be supported.

The need for a 124-metre-wide ecological linkage that fully constrains the Subject Land's Gordon Street frontage appears excessive and not necessary. The linkage includes approximately 100 metres of NHS bordered by 12 metres of Moraine Ribbon on the north and south sides of the NHS. The Moraine Ribbon, at a minimum, could be incorporated into the NHS to provide for more developable frontage for the Subject Lands. The need for a 100 metre ecological linkage is also questionable. The project team's environmental consultants, NRSI, have monitored wildlife crossings along Gordon Street for a year and did not find any significant movement in this location that would warrant such an extensive width of crossing. A copy of NRSI's commenting letter has been appended to this submission.

The goal of providing a natural connection across Gordon Street could still be achieved with a reduced NHS crossing, while still maximizing the multi-modal function of Gordon Street. The feasibility of constructing a multi-use overpass is meant to be conducted as part of the Gordon Street design. Eliminating the need for an expansive ecological linkage, the wildlife crossing and two 12-metre-wide Moraine Ribbon connections could significantly reduce the width of the overpass. A reasonably sized trail connection over Gordon Street would be more cost effective and feasible to construct and provide an opportunity for increased density to facilitate more affordable housing opportunities in a High Density Residential and/or Mixed Use designation. This would also support the overall density targets for the corridor itself. Further, the current NHS presented in Schedule E of the Secondary Plan does not appear to be based on the Provincial mapping which designates only a portion of the Subject Lands as Wetland and Woodland.

As noted in Section 11.3.3.1.4 and 11.3.3.2.3 of the CMSP, various technical and environmental studies are required prior to development. Currently the CMSP mapping proposes a hard boundary between the NHS and Moraine Ribbon and any residential land uses. We also question the location of the "hummocky terrain". It is recommended that the further studies be completed now to ensure development can be implemented with appropriate limits and an interface between uses. Undertaking the required environmental studies now and mapping the areas through the implementing zoning, will reduce the added cost to the implementation of development thereby meeting the Provincial objectives for reducing the overall cost of housing.

### Servicing and Phasing

The CMSP provides for the progression of growth and servicing from the north to the south per the Master Environmental Servicing Plan ("MESp") and Section 11.3.5.3 recommendations. However, not all development will occur in a linear progression, and servicing may not be available along the southern portion of the CMSP area until the northern property owners have approvals. As such, property owners should have the opportunity to further consider alternative servicing strategies with the City which include providing multiple sanitary sewer outlets for the area or possibly extending the proposed gravity sanitary sewers proposed along Gordon Street in an effort to permit additional lands to develop sooner. It is also not clear if the City has addressed the implications associated with the proposed servicing approach should one (1) or more of the many landowners within significant infrastructure specified within their boundaries (i.e. sewage pumping stations, forcemains, gravity sanitary sewers, watermain, etc.) not wish to proceed with development immediately following approval of the CMSP. Further policies related to the ability to amend the phasing plan should be provided which would enable the Subject Lands to be included in earlier phases. We also recommend the Gordon Street Corridor be unphased. These revisions and additional policies should be addressed with updates to the CMSP.

Additionally, the City should clarify the extent to which infrastructure proposed for the CMSP will be provided within existing lands owned by the City and/or within municipal right-of-ways to facilitate and

support the timely and efficient servicing and development of lands within the CMSP area at the least possible cost.

We also note that the MESP provides conceptual drainage plans. These infer that grading is to remain the same in areas in which development will occur, which may not be able to be achieved through site design.

The various infrastructure projects required within the boundary of the CMSP will still be subject to Municipal Class EA's and the City should clarify the process, timing and budget for these projects and whether they can be addressed through integrated EA's with Draft Plans of Subdivision.

### Road Network

Section 11.3.6.4 and Schedule C – Mobility Plan provide limited internal roadways, particularly within the Subject Lands and along the east side of Gordon Street and there are no north-south connections with the exception of Street F and limited east-west connections. A majority of the connecting roads in the CMSP connect to Gordon Street. Clarification regarding the flexibility of the proposed road alignment is requested and an option to consider a road connection through the NHS and the elimination or substantial reduction of the ecological linkage will enable the Subject Lands to connect to Gordon Street to provide for additional higher density and mixed-use lands and connect to the higher density designated lands to the east. Currently, Street D does not adequately line up with property boundaries. It is recommended that Street D be moved toward the boundary of the Subject Lands to both maximize density for the block of land in that area and support a logical street pattern.

The proposed street widths provided in Section 11.3.6.6 also include additional width where the right-of-way abuts the Moraine Ribbon to include wider pedestrian and bicycling facilities. As noted in the chart in Section 11.3.6.6, all streets are to include pedestrian and bicycling facilities, in addition, to the active transportation route and trails that the Moraine Ribbon provides. As such, it seems unnecessary to increase widths adjacent to the Moraine Ribbon as these active transit routes are already accounted for and added width would provide for additional unnecessary paved surfaces.

### Open Space System: Moraine Ribbon, Trails and Parks

The need for and rationale for the Moraine Ribbon and the minimum 12 metre width is not clear and we question the need for an additional Moraine Ribbon in areas where a trail could be accommodated within the NHS. There are also a number of policies associated with the Moraine Ribbon for which clarification is needed. Given the proposed policies, clarification is needed on: where and how the minimum width (noted as 12 metres in Section 11.3.7.4.10) is to be determined to ensure significant increased widths are not required through the subdivision process and to understand where the minimum width should in fact be reduced. Also, it is not clear how and where portions of the Moraine Ribbon will be classified as “parkland” and be eligible for parkland dedication as stated by the City; and, what “other securement options” as stated in Section 11.3.7.4.11 could include.

As noted, the minimum 12 metre width seems an excessive width for the Moraine Ribbon given the range of proposed functions. There are also issues with the alignment of the Moraine Ribbon on the Subject Lands as it results in remnant small areas that are not developable. The location of the Moraine Ribbon where justified should allow for a flexible alignment and take property ownership boundaries into consideration.

### School Block

While several of the CMSP schedules show an elementary school on the Subject Lands, the MESP schedule illustrates the general location of the block for the school which results in only a small portion of the school block on the Subject Lands. While we understand the co-location between the stormwater management facility and the school block, we question the configuration of the school block and why it would not be better aligned by pushing the block south into a wider block in the property to the south. This could also facilitate a narrower stormwater management facility. These adjustments and alignments would provide for more developable areas and an improved configuration of the two blocks.

### Stormwater Management

There appear to be a number of inconsistencies with the figures set out in the MESP and the phasing plans with respect to stormwater management and the Subject Lands. Figure GW-6 (Appendix F of the MESP) considers the relocation of the stormwater management capture area on the Subject Lands. However, this potential relocation is not referenced, illustrated or discussed in any of the text or on any of the figures presented in the main body of the MESP. If the City is considering the relocation of the stormwater management capture area as illustrated on Figure GW-6, additional details and/or clarification from the City is required to detail how the overflow from this area will be directed to an existing depression area, which is specified as a key criterion for the overall stormwater management approach in the CMSP area.

The MESP shows an expansive block for a stormwater management facility on the Subject Lands. We question whether this block can be better aligned to increase the developable area to the east. We also question the City's preferred servicing strategy which outlines various surface water capture ("SWC") areas throughout the CMSP area. We trust these SWC areas will be further refined in terms of location, size, footprint, contributing drainage area, as part of future development applications without the need for amendment to the CMSP and that the surface water capture (SWC) areas required within the CMSP can be adjusted to recognize the various property boundaries and development schedules of each individual property owner.

In addition, Section 11.3.7.6.3 notes *"Efforts to design stormwater management capture areas to enhance safety when in proximity to schools and neighbourhood parks will be encouraged."* As further safety measures would need to be put in place due to the proximity to the proposed school, it is recommended that either the proposed schools or Stormwater Management Capture Areas be reconfigured. It should also be noted that the Subject Lands are already in proximity to an existing wet area and Halls Pond within the Natural Heritage System. Introducing a Stormwater Management Capture area may not be necessary and should be determined through appropriate studies.

### Fiscal Impact Study

Based on our initial review of the Fiscal Impact Study we would note the following:

- The population planned for the CMSP is much higher than the forecasted population for the area and it is not clear how this will be adjusted through Development Charges.
- The study recommends cost-sharing and front ending agreements for services and pre-payment or some form of allocation agreement prior to development. There is little detail of how such pre-payment or allocation would be tied to phasing or if there would be thresholds for pre-payment amounts or development amounts with phasing. We would also note that pre-payment for

services (in the absence of development revenue) will have a negative impact on the affordability of the housing.

We believe these issues and questions need to be further clarified.

We appreciate the opportunity to provide feedback throughout the Draft Secondary Plan process. We are generally supportive of the policy direction, however want to ensure that Options for Homes can maximize the opportunity to provide affordable housing in the CMSP and Guelph as a whole, while balancing all other objectives of the Secondary Plan. Based on our initial comments, we believe there are a number of revisions to the draft schedules and policies and we would appreciate meeting with staff to further discuss such changes.

We respectfully request that this letter be accepted as feedback pertaining to the September 22nd, 2021 Statutory Public Meeting, and be considered by the City in the next phase of the Draft Clair-Maltby Secondary Plan process. We strongly encourage Council to direct staff to work with Options for Homes to ensure the CMSP and implementation of the plan provides for the best opportunities to optimize lands for affordable housing and allow for the most efficient implementation to realize new affordable housing supply as soon as possible to address the City's housing needs.

We may have additional comments as the process moves forward and would be happy to participate in any further consultation or opportunities for meetings with other landowners and stakeholders.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'Dana Anderson', written in a cursive style.

Dana Anderson, FCIP, RPP  
Partner

Attachments: Location Map  
NRSI Letter

Cc: Stacey Laughlin, City of Guelph



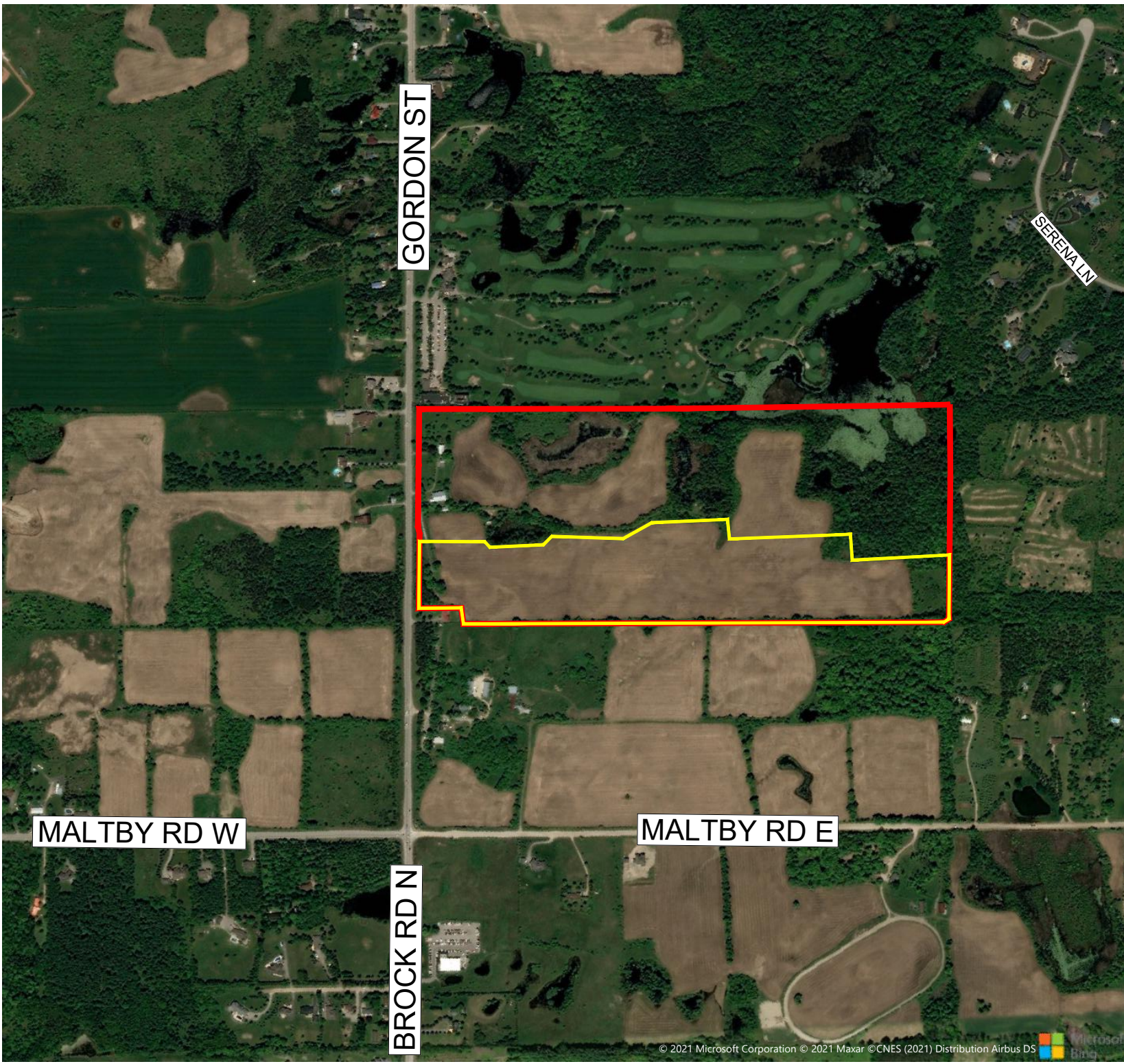


Figure 1  
LOCATION MAP

2162 Gordon St,  
Guelph, Ontario

LEGEND

- Vendor's Property
- Purchaser's Property

DATE: August 12, 2021

SCALE: 1:10000



N:\17285\B - Clair-Malby Secondary Plan\Technician Data\1 - Location Map.dwg

Data Source: City of Guelph





September 15, 2021

2063C

Stacey Laughlin  
Senior Policy Planner  
Planning, Urban Design and Building Services  
1 Carden Street  
Guelph, ON N1H 3A1

Dear Ms. Laughlin

**Re: Clair-Maltby Natural Heritage Comments  
2162 Gordon Street**

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On behalf of Natural Resource Solutions Inc. (NRSI) and the owners of 2162 Gordon Street, we are pleased to provide a number of comments related to the natural heritage system mapping and policies based on the most recent documents prepared by the City of Guelph for the Clair-Maltby Secondary Plan (June 2021).

Members of the consulting team, including NRSI, attended the public open house webinars on June 24, 2021 where the Draft Secondary Plan was presented along with supporting documents. NRSI has also reviewed the Clair-Maltby Draft Secondary Plan and the Comprehensive Environmental Impact Study (CEIS): Phase 3 Impact Assessment, both dated June 16, 2021.

Based on a detailed review of the above noted documents, we have provided a number of comments on the environmental policies and mapping created by the City as part of the most recent Clair-Maltby Secondary Plan update (2021). In general, these comments relate to the following items:

- **Draft Secondary Plan/CEIS policies and mapping**
  - Significant Landform – design restrictions mentioned should be applied to the feature rather than the adjacent lands;
  - Significant Wildlife Habitat– 50m adjacent lands should be adhered to as per the City of Guelph Official Plan. Candidate Bat Maternity SWH has been broadly delineated contrary to the methods of the Significant Wildlife Habitat Criteria Schedules;
  - Ecological Linkage – recommended removal of this feature due to low wildlife use of these areas, anticipated high intensity land use, and unsuitable crossing location at Gordon Street;
  - Halls Pond/Significant Wetlands – bathymetry and other detailed studies and monitoring of Halls Pond should be undertaken by the City rather than specific landowners;
  - Gordon Street Overpass/Wildlife Crossing – recommended removal of this crossing location and associated overpass due to low wildlife movement, unsafe crossing, and unsuitable human/wildlife overpass;

- Clair-Maltby Monitoring Plan – ongoing monitoring plan should be property specific. Landowners and consultants should have the opportunity to comment on the proposed plan; and
- Moraine Ribbon – the purpose of this feature is unclear and is not supported from a natural heritage perspective.

A table providing more specific details on the aforementioned items is attached to this letter.

We are happy to discuss any of our comments with City staff, should you have any questions or comments.

Sincerely,  
Natural Resource Solutions Inc.



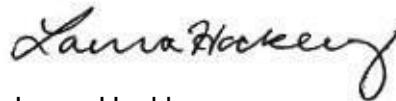
David Stephenson  
Senior Terrestrial and Wetland Biologist



Nathan Miller  
Senior Terrestrial and Wetland Biologist



Nyssa Hardie  
Ecohydrologist



Laura Hockley  
Environmental Analyst

Page Number and Policy Reference	Text	NRSI Comments
<p>pg. 10 11.3.3.2.</p>	<p>New development will be guided by detailed technical studies. Studies completed in support of development, site alteration and/or capital works shall:</p> <ul style="list-style-type: none"> <li>a. be consistent with the recommendations of the Clair-Maltby CEIS and MESP;</li> <li>b. assess potential impacts to the Natural Heritage System and <i>water resource system</i> in an integrated manner using the most current integrated groundwater-surface water models available; and,</li> <li>c. <b>notwithstanding the width of adjacent lands specified in Table 4.1 of the Official Plan, assess wildlife movement and ecological functions in the broader landscape based on 240 metre adjacent lands to appropriately identify significant wildlife habitat (including ecological linkages) that meet the criteria for protection policies of the Official Plan.</b></li> </ul>	<p>As specified, Table 4.1 of the OP (2021) currently lists 50m adjacent lands for assessing Significant Wildlife Habitat (including ecological linkages).</p> <p>Clarity is required in terms of what this section is referring to. Does this strictly apply to wildlife movement and ecological linkages or does it also apply to assessing Significant Wildlife Habitat (i.e. within 240m)? The 50m adjacent land width should be used for Significant Wildlife Habitat within the Clair-Maltby Secondary Plan Area.</p>
<p>pg. 10 11.3.3.2.4</p>	<p>In addition to the requirements of 11.3.3.2.3, and as established in the CEIS and MESP, development and site alteration within adjacent lands to significant wetlands shall be required to address the protection of the subject wetland's water balance and hydrologic functions demonstrated through the application of area-specific stormwater management targets.</p>	<p>Adjacent lands to Significant Wetlands according to the OP is 120m. Any development within 120m of a significant wetland will require a study of the water balance specific to the wetland feature.</p> <p>Policy 11.3.3.1.6 specifies that EISs must consider impacts to downstream receivers, but no mention of distances in the context of adjacent lands is provided. A distance of 120m should be included in this policy, consistent with the adjacent land width.</p>

Page Number and Policy Reference	Text	NRSI Comments
<p>pg. 11 11.3.3.2.8</p>	<p>Where <i>development</i> is proposed adjacent to Halls Pond or Neumann’s Pond, a full bathymetric survey of Halls Pond and Neumann’s Pond is required based on appropriate guidelines and standards, to the satisfaction of the City in consultation with the GRCA.</p>	<p>The wording associated with policy 11.3.3.2 (pg. 13) mentions that this work is to be completed for lands within the ‘catchment area’. Whereas policy 11.3.3.2.8 refers to lands adjacent to Halls Pond and Neumann’s Pond. Consistency in the use of ‘catchment area’ and ‘adjacent lands’ is needed. In the context of Hall’s Pond and Neumann’s Pond, ‘catchment area / catchment’ is the most appropriate term.</p> <p>The City should be responsible for carrying out this study rather than the development proponents. Some landowners only have partial access to Halls Pond, while others within the catchment area will not have any direct access, preventing them from completing this work.</p>
<p>pg. 12 &amp; 13 11.3.3.2.13</p>	<p>13. Within the adjacent lands to significant landform, the environmental impact study and/or environmental assessment prepared for proposed development, site alteration and/or capital projects must demonstrate that the proposed development design:</p> <ol style="list-style-type: none"> <li>a. maintains ecological and hydrologic functions of the significant landform;</li> <li>b. maintains linear continuity of the significant landform;</li> <li>c. respects natural contours to the extent feasible;</li> <li>d. minimizes the use of retaining walls;</li> <li>e. minimizes the extent and intensity of grading;</li> </ol>	<p>The term ‘adjacent lands’ is not appropriate when discussing significant landform because it is not an ecological feature. Additionally, significant landform was not delineated based on ecological or hydrological concepts and, as such, these functions should not have to be considered when proposing development adjacent to significant landform. An EIS or EA is not necessary in this regard; the design criteria listed (‘c’ through ‘l’) are not associated with ecological principles. Single loaded roads adjacent to NHS features have the potential to encourage</p>

Page Number and Policy Reference	Text	NRSI Comments
	<ul style="list-style-type: none"> <li>f. maximizes the extent of permeable surfaces;</li> <li>g. decreases in density and height in the direction of the significant landform;</li> <li>h. incorporates roads that approach, and are not parallel to, the significant landform to the extent feasible; and,</li> <li>i. incorporates single-loaded roads where roads that run parallel to the significant landform are identified as required through the subdivision process, and are feasible.</li> </ul>	<p>unauthorized access, trail creation, and dumping of garbage/waste. The existing wording indicates that single loaded roads are a mitigation measure, which is not always the case. In some cases, rear yards of residential houses have greater protection of NHS features in this context.</p>
<p>pg. 13 11.3.3.2.15</p>	<p>Where an ecological restoration opportunity is confirmed, it shall achieve one or more of the following:</p> <ul style="list-style-type: none"> <li>a. improve ecological and/or hydrologic functions;</li> <li>b. enhance Natural Heritage System connectivity;</li> <li>c. establish natural vegetation communities through the planting of indigenous species compatible with local site conditions; and,</li> <li>d. improve wildlife habitat.</li> </ul>	<p>NRSI has had recent verbal conversations with the City regarding restoration activities within plantation vegetation communities inside the NHS, such as tree thinning, invasive species management, garbage removal, etc.</p> <p>The following ecological restoration activity should be included within the list:</p> <ul style="list-style-type: none"> <li>e. management of vegetation within NHS features (e.g., invasive species removal, plantation thinning)</li> </ul>
<p>pg. 13 11.3.3.2</p>	<ol style="list-style-type: none"> <li>1. The bathymetry and sediment depths of Halls Pond must be confirmed using approved field methods as part of environmental impact study requirements for development and site alteration located within the Halls Pond catchment.</li> <li>2. The bathymetry and sediment depths of Halls Pond must be confirmed using approved field methods as part of <i>environmental impact study</i></li> </ol>	<p>The City should be responsible for carrying out this study rather than the development proponents. Some landowners only have partial access to Halls Pond, while others within the catchment area will not have any direct access, preventing them from completing this work.</p>

Page Number and Policy Reference	Text	NRSI Comments
	requirements for <i>development</i> and <i>site alteration</i> located within the Halls Pond catchment.	
pg. 13 11.3.3.2	3. When development is proposed adjacent to Halls Pond, a management plan shall be prepared for Halls Pond to establish appropriate access, recreational use, and restoration, consistent with the preservation and protection of ecological and hydrologic features and functions.	<p>Since the management plan will focus on an area largely owned by the City as part of the NHS and parks, it is appropriate for the City to prepare this plan, with input from respective landowners.</p> <p>The bathymetry studies referenced above should be included as part of this management plan rather than through an EIS process.</p>
pg. 28-29 11.3.7.4	<p>1. The Moraine Ribbon will be comprised of a series of generally continuous linear open spaces that will be established adjacent to the Natural Heritage System and may include interconnected park areas, <i>stormwater management capture areas</i>, <i>cultural heritage resources</i>, naturalized areas, and the Active Transportation network as identified on Schedule C.</p> <p>2. The Moraine Ribbon will accommodate a trail, or its equivalent, throughout in accordance with the policies of Section 11.3.3.3 of this Secondary Plan.</p> <p>3. <i>Active Transportation</i> routes may be accommodated in the Moraine Ribbon in locations identified on Schedule C. The Moraine Ribbon should generally provide an east-west <i>active transportation</i> route across Clair-Maltby.</p> <p>4. Where the road system abuts or traverses the Natural Heritage System, enhanced pedestrian and cycling facilities within the Right of Way will be</p>	<p>The policies related to the Moraine Ribbon in the Draft Secondary Plan are unclear in terms of what this feature is and how it fits into the context of the other components of the Clair-Maltby Secondary Plan (i.e. it is not considered part of the NHS, buffers, or parkland). The Moraine Ribbon has been proposed as an additional 12m wide swath of land that largely encircles the Natural Heritage System. Although not considered part of the NHS, it appears to function as an additional buffer above and beyond what has been deemed to be necessary for the protection of the NHS features. It has no technical basis and does not provide an ecological function as it relates to the protection or enhancement of NHS features.</p> <p>In item 6 the reference of the Moraine Ribbon being potentially located in the</p>

Page Number and Policy Reference	Text	NRSI Comments
	<p>provided in-lieu of the Moraine Ribbon, as identified on Schedule C.</p> <p>5. Resting and/or gathering areas, or other amenities, as well as opportunities to provide views of the natural environment and the <i>Paris Galt Moraine</i>, will be incorporated into the Moraine Ribbon.</p> <p>6. The Moraine Ribbon will not be located in the identified Natural Heritage System, including its buffer, within Clair-Maltby, unless an <i>environmental impact study</i> or <i>environmental assessment</i> has demonstrated that there will be no <i>negative impacts</i> on the protected <i>natural heritage features and areas</i> or their associated <i>ecological functions</i>.</p> <p>7. The construction of a multi-use overpass over Gordon Street to provide an east-west connection via the Moraine Ribbon and Natural Heritage System for humans and wildlife will be explored in the location identified on Schedule C in accordance with policy 11.3.6.1.7.</p> <p>8. To ensure continuity of the Moraine Ribbon, it will be integrated, where possible, with:</p> <ul style="list-style-type: none"> <li>a. land that is acquired for stormwater management purposes/<i>stormwater management capture areas</i>;</li> <li>b. a neighbourhood or community park;</li> <li>c. a potential future school block; and</li> </ul>	<p>NHS, should be revised to clarify that trails may be located in the NHS pending an EIS etc.</p> <p>Item 7 identifies that both humans and wildlife will utilize the Gordon Street overpass. It should be noted that very little wildlife was observed crossing Gordon Street during wildlife movement studies at properties on both sides of Gordon Street. Furthermore, given the intensity of future development proposed along Gordon Street it is not appropriate to redirect wildlife to this area. As such, NRSI is not supportive of a wildlife crossing in this location. A combined human-wildlife overpass is not generally considered a suitable option for a crossing structure. NRSI would like the opportunity to comment on any future plans at this location.</p>



<b>Page Number and Policy Reference</b>	<b>Text</b>	<b>NRSI Comments</b>
	<p>d. a road right-of-way and therefore acquired as part of the road.</p> <p>9. Priority for acquisition will be given to those sections of the Moraine Ribbon that connect residents to amenities as well as recreational opportunities. The priority areas are identified on Schedule D as “Preferred Moraine Ribbon Locations”, while secondary areas are identified as “Other Potential Moraine Ribbon Locations”.</p> <p>10. The width of the Moraine Ribbon will be approximately 12 metres - the width will be flexible to respond to the unique features of the area and will be determined through the detailed design of the Moraine Ribbon through the subdivision design process and/or at the time of acquisition.</p> <p>11. The City will pursue ownership of the Moraine Ribbon, however, other securement options that achieve the objective of permanent public access may be considered.</p>	

Page Number and Policy Reference	Text	NRSI Comments
<p>pg. 43 11.3.9.3.2</p>	<p>In accordance with guidance of the CEIS and MESP, a comprehensive Clair-Maltby-wide Natural Heritage System monitoring program will be developed by the City to meet the objectives and policies of this Secondary Plan:</p> <ul style="list-style-type: none"> <li>a. Proponents of future development will be required to participate in and contribute to the comprehensive Clair-Maltby-wide Natural Heritage System monitoring program to ensure that mitigation measures are functioning as anticipated; and,</li> </ul> <p>Monitoring requirements will be determined as part of area-specific environmental impact studies, environmental implementation reports and/or environmental assessments prepared for proposed development, site alteration and/or capital projects.</p> <p>In accordance with guidance of the CEIS and MESP, a comprehensive Clair-Maltby-wide Natural Heritage System monitoring program will be developed by the City to meet the objectives and policies of this Secondary Plan:</p> <ul style="list-style-type: none"> <li>b. Proponents of future development will be required to participate in and contribute to the comprehensive Clair-Maltby-wide Natural Heritage System monitoring program to ensure that mitigation measures are functioning as anticipated; and,</li> <li>c. Monitoring requirements will be determined as part of area-specific environmental impact studies, environmental implementation reports and/or environmental assessments prepared for proposed development, site alteration and/or capital projects.</li> </ul>	<p>Ongoing monitoring is proposed but details on duration and monitoring techniques have not been specified. More detail is required regarding the purpose, scope, monitoring methodologies and frequency. Landowners and consultants should have an opportunity to comment on the proposed monitoring program. The monitoring program should be site-specific and should not be a secondary plan-wide undertaking involving cost sharing, as there is potential for certain landowners to have to pay for monitoring that is not occurring on or specific to their property.</p>

<b>Comprehensive EIS Impact Study (2021) Mapping Comments</b>		
Maps NH-9 and NH-10	Detailed SWH Mapping, SWH Mapping	Candidate Bat Maternity Colonies SWH has been broadly delineated throughout the Clair-Maltby study area in locations where deciduous or mixed-deciduous woodland is identified. As per the Ecoregion Criteria Schedules (MNRF 2015), Candidate SWH for this habitat type requires the completion of detailed bat cavity tree (snag) assessments and the confirmation of >10 snags/ha. This field work has not been completed in these areas, and as such, these 'candidate' habitats should be removed from mapping until such time as this information has been confirmed. The corresponding Natural Area Overlays that correspond to these features should also be removed.
Map NH14A	Refined NHS for Secondary Plan Area	Ecological Linkage and an associated Wildlife Crossing is identified at 2162 Gordon Street. Based on the detailed wildlife monitoring completed at this property, as well as the properties across Gordon Street, very little wildlife movement was observed crossing at this location. Given the proposed high density land use following buildout, coupled with the increased size and use of Gordon Street, there is likely to be even less wildlife movement in these areas. Without a viable plan to convey wildlife safely across Gordon Street, NRSI is not supportive of a Wildlife Crossing and associated Ecological Linkage at this

		<p>location, and it is requested that these features be removed from Secondary Plan mapping.</p> <p>NRSI is able to provide supporting data related to wildlife monitoring at 2162 Gordon, if requested.</p>
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