

To: Email address: [clerks@guelph.ca](mailto:clerks@guelph.ca), [michael.witmer@guelph.ca](mailto:michael.witmer@guelph.ca)  
From: [REDACTED]  
Subject: ZONING & BY-LAW APPLICATION: 1373-1389 Gordon  
FILE # OZS22-01

I am a resident at [REDACTED] Vaughan Street and I'm also a final year veterinary student at the Ontario Veterinary College and am vehemently against the proposed changes in our Planning By-Laws as follows.

I am extremely concerned about the detrimental impact of this proposal on the local wildlife and ecosystems. I strongly believe that cutting down nearly 200 mature trees and leveling all vegetation on the site, mainly to put in a surface parking lot is unconscionable. You can find the plan to remove trees on page 5 of the Tree Management Plan where the developer states that they'll need to remove 190 trees with an additional 41 trees being injured in the process. Furthermore, you can see based on their site plan found on page 19 of the Urban Design Brief that 75% of the land will be cleared for the surface parking lot while only 25% of it will be taken up by the actual building. The city plans to increase the tree canopy in Guelph, but this development is a direct contradiction to that goal, and I have no doubt that the trees that planted on this site will be saplings that will not even provide a small percentage of the resources that a mature tree provides to the wildlife here. The previous development proposal for this site which is mentioned on page 2 of the Planning Justification Report was rejected due to the planned removal of too many trees and the proposed surface parking lot was deemed to be excessive. Since the public doesn't have access to that proposal, I ask that you look at that previous proposal closely and compare it with the current plan and ask whether removing 200 mature trees mainly for a surface parking lot, is a significant improvement on the previous rejected proposal, since it appears that the exact issues that necessitated a rejection initially haven't been fixed or addressed in this plan.

My second very serious concern about this parking lot has to do with the light pollution that will undoubtedly result. The environmental impact study identified several endangered bat species that could potentially roost on the subject lands and will be negatively impacted by this construction. You can find this list on page 28 of the Environmental Impact Study. The Government of Canada has even published an official recovery plan for three endangered bat species, all of which have been identified here<sup>2</sup>. These conservation efforts are a result of very serious concerns about the dwindling population of these bats which are considered key species in maintaining ecosystems. We need to address the fact that this proposal not only removes potential habitats which were identified by the EIS but also address the long term, cumulative impact of light pollution from the proposed parking lot. A recent peer reviewed article cumulated data on the impact that light pollution has on bats<sup>6</sup>. They found that artificial light such as the lighting from the proposed parking lot causes habitat fragmentation, reduced foraging opportunities, delays roosting and breeding behaviour, can cause roost abandonment, and negatively impacts their reproduction which is already a significant issue in bat conservation since they are slow breeders. Lastly, it can cause stress which disrupts their hibernation patterns causing them to prematurely emerge but leaves them unable to survive due to lack of foraging opportunities. The effects of this parking lot contradict the efforts that the Canadian Government has outlined which includes mitigations and consideration of these bats in new developments. Page 52 and 53 of the Environmental Impact Study discuss ways to mitigate light pollution but they're entirely inadequate in that it doesn't discuss the light pollution from the parking lot but only refers to the building and furthermore, those recommendations are developed for birds, not bats so they don't apply here. If the surface parking lot was to be amended to be an underground parking lot instead, that would greatly reduce the negative impact that the lighting would have on surrounding areas where the bats may roost. In general, the environmental impact study recommendations do not address the long-term damaging effects that the parking lot and building will cause these endangered species. You can see their recommendations and mitigations proposed on page 4 of Appendix F of the Environmental Impact Study. This proposed building is adjacent to lands that are provincially significant so *there*

*must be stricter expectations required of the developer to mitigate short- and long-term impacts on the wildlife in the area, particularly to stay in line with federal conservation efforts.* It's a huge failing of the EIS and I urge council members to seriously evaluate what type of impact this would have on the wildlife in the area. If these bats aren't protected by rejecting this proposal, then we can expect the rest of the wildlife in the area to suffer grave consequences as a result, including the potential to cause an ecosystem collapse in this Significant Wildlife Habitat. Furthermore, higher buildings increase the risk of flying into windows as bat sonar is ineffective at identifying building windows<sup>3</sup>. Again, the solution to this problem is simple: Minimize the negative effects on wildlife by developing a smaller structure which would allow them to build an underground parking lot, leaving 75% of the subject lands untouched. This would help to preserve potential bat habitats, preserve a large portion of the trees that they currently plan to remove and importantly, it would help mitigate the impact of light pollution on the local endangered bat species.

My other concern with this parking lot is the inadvertent salt run off. The environmental impact study identified numerous species including the endangered Jefferson salamanders that may live in the area that could be harmed. On page 42 of the EIS they state that: "Sodium and chloride pollution from road salt has the potential to migrate from the subject lands postdevelopment, to receiving sensitive habitats, and may disrupt life processes of sensitive aquatic and terrestrial plant and animals. Mitigation to minimize or eliminate potential salt *pollution is a requirement associated with this EIS.*" However, the developers salt management plan seen on page 1 and 2 includes the use of a salt/sand mixture showing their disregard of the EIS requirements. Furthermore, even if they were to modify their salt management plan to be less harmful, the 162 vehicles that will be parked there, will be an inadvertent source of salt in either case. Furthermore, the salt management plan has gaps in its proposal in that it states on page 1 that "plowed snow will be stored in the snow storage areas identified on the approved Site Plan". This area is not identified on the site plan which shows a lack of thoroughness with their management plan. The swales that they plan to put in may help to reduce but won't eliminate the salt run off, particularly in higher velocity run off such as rapidly melting snow. The solution once again is that this surface parking lot must be rejected and I suggest that the city's environmental planning staff evaluate the validity, accuracy and adequacy of the Environmental Impact Study, the Tree Management Plan and the Salt Management Plan that have been conducted.

In their justification report the developer states that "The proposed Amendments will facilitate the construction of a development that will not have any negative impacts on adjacent natural heritage features...". This is entirely false, and I have listed just 3 of the serious environmental issues with this proposal but that does not even begin to cover the full impact that this specific development will have. Furthermore, on page 12 of the Environmental Impact study, it was stated that a survey licence application was not pursued to help identify whether endangered Jefferson Salamanders were present on the subject lands and an egg mass survey was conducted instead. On page 34 of the EIS they state "Extensive agricultural development and urbanization are prevalent in the limited range of Jefferson salamander and have severely reduced and fragmented the wetlands and forest habitat available to this species." Discussion with Dr. Jim Bogart as reported in the EIS Appendix A 3.1 and A 3.2, determined that the salamander species can't be determined at this time. I ask the council to ensure that the issue is properly evaluated, as I don't think it's right to assume that Jefferson salamanders aren't present on the subject lands based on their interpretation of their habitat. Under the Provincial Endangered Species Act, 2007, "it is illegal to kill, harm or harass an endangered or threatened species, or to damage or destroy its habitat, except where otherwise exempted, regulated, or permitted." If this issue isn't properly studied, they may be doing just that. Furthermore, the environmental planning staff should confirm whether a certified wetland assessor was involved in this EIS as required in the Guelph guidelines for performing an Environmental Impact Assessment.

My concerns about the street parking, traffic congestion and increased accident rate are as follows:

I have general concerns about the Gordon Street intensification plan as it will create a huge bottleneck to and from the highway in the south end. This area is specifically appealing to residents that require highway access for their commute. Adding tall buildings with more cars with the hope that residents will choose to take public transit or ride bikes is entirely unrealistic in the south end because this area is targeted by commuters. By allowing developers to construct higher buildings than those that are zoned in that area will continue to add time to an already increasing commute for these individuals and it will negatively impact resident's quality of life. With increased traffic congestion, comes an increased risk of collisions as has been correlated in peer reviewed articles. A recent report of dangerous intersections in Guelph, showed that Gordon Street and Clair Road is already one of the most dangerous in the city. Adding 72-74 vehicles at peak hours in this area will only make that situation worse which is the number anticipated by the developer in their Traffic Impact Assessment on page ii. Furthermore, the traffic impact study stated that this building would not contribute to traffic congestion in any meaningful way. This statement and the entirety of the traffic impact assessment was based on traffic surveys completed in 2019 (seen on page 1) which do not provide accurate information about current congestion. Furthermore, this conclusion does not make sense since on page ii it states how Arkell and Gordon and Gordon and Edinburgh are expected to be a highly congested intersections. In any case, this entire neighbourhood only has one traffic light out of it so an additional 72-74 cars at rush hour will be devastating to the local traffic movement here and will cause more accidents at Heritage Way and Gordon Street.

Furthermore, this building will negatively impact street parking in that the majority of current parking on Vaughan will need to be removed to create the single building entrance. The existing number of spots are already insufficient for current residents, especially on the weekends when there are more visitors. Many visitors have even voiced their concerns about this in our petition. This entrance from Vaughan Street is impractical due to having to remove the street parking but also due to the flow of traffic on Vaughan Street. This is completely unmanageable and will create back-up traffic onto Gordon Street.

As a community, we are strongly opposed to this proposal. That doesn't mean we're entirely opposed to all developments, but it means rejecting proposals such as this one, that are needlessly remove excessive number of trees and are detrimental to the wildlife and local residents. Council members need to ensure that the needs of all affected stakeholders are *equally valued and considered*, which would include balancing the needs of residents, wildlife with the need for more housing. The developer has failed to justify the need to rezone the site, and they have failed to show how this current proposal is an improvement on the previous rejected proposal. I request that you reject the zoning change, have the environmental planning staff evaluate their documents and suggest that the developer to present a new proposal with a lower structure, an underground parking solution with far fewer trees removed and that they have access to the site from Gordon Street rather than Vaughan Street.

Thank you for this opportunity to speak.

Signed: Marina Kashevsk-Gozdek

## References

1. 2015-2019 collision report - *pub-guelph.escribemeetings.com*. (n.d.). Retrieved March 18, 2022, from <https://pub-guelph.escribemeetings.com/filestream.ashx?DocumentId=7031>
2. Government of Canada, P. S. and P. C. (2013, April 3). *Recovery strategy for the Little Brown Myotis (Myotis Lucifugus), the northern myotis (myotis septentrionalis), and the tri-colored bat (Perimyotis subflavus) in Canada.: En3-4/308-2018E-PDF*. Government of Canada Publications - Canada.ca. Retrieved March 17, 2022, from <https://publications.gc.ca/site/eng/9.865901/publication.html>
3. Greif, S., Zsebök, S., Schmieder, D., & Siemers, B. M. (2017). Acoustic mirrors as sensory traps for bats. *Science*, 357(6355), 1045–1047. <https://doi.org/10.1126/science.aam7817>
4. Hintz, W. D., & Relyea, R. A. (2019). A review of the species, community, and ecosystem impacts of road salt salinisation in Fresh Waters. *Freshwater Biology*, 64(6), 1081–1097. <https://doi.org/10.1111/fwb.13286>
5. Retallack, A. E., & Ostendorf, B. (2020). Relationship between traffic volume and accident frequency at intersections. *International Journal of Environmental Research and Public Health*, 17(4), 1393. <https://doi.org/10.3390/ijerph17041393>
6. Stone, E. L., Harris, S., & Jones, G. (2015). Impacts of artificial lighting on bats: A review of challenges and solutions. *Mammalian Biology*, 80(3), 213–219. <https://doi.org/10.1016/j.mambio.2015.02.004>