

May 13, 2022

1853

Mayor Cam Guthrie and Members of Council
City of Guelph
1 Carden Street
Guelph, ON N1H 3A1

Dear Mayor Cam Guthrie and Members of Council,

**Re: Natural Heritage Response to May 2022 Draft Clair-Maltby Secondary Plan
(Official Plan Amendment 79)
2009, 2021, and 2093 Gordon Street**

Natural Resource Solutions Inc. (NRSI) is pleased to provide the following letter on behalf of the owners of 2009, 2021, and 2093 Gordon Street in response to the materials prepared by the City of Guelph for Official Plan Amendment (OPA) 79, the proposed Clair-Maltby Secondary Plan, to be put forward to Council for approval on May 16th, 2022.

As part of OPA 79, the City has revised the Draft Secondary Plan policies and mapping, including those within the Clair-Maltby Draft Secondary Plan and the Comprehensive Environmental Impact Study (CEIS): Phase 3 Impact Assessment, dated May 2, 2022. In addition, the City has provided a comment table (Attachment 6-1) within the Agenda for the Council Meeting in response to comments provided by NRSI (dated September 15, 2021) on the earlier iteration of the Clair-Maltby Secondary Plan and supporting materials.

NRSI appreciates the detailed comments provided by City staff, including the number of revisions to policy and mapping within the Draft Secondary Plan and CEIS. Throughout the Secondary Plan process NRSI has provided numerous comments on the NHS and has also met with City staff to discuss these comments on several occasions. Nonetheless, NRSI and the owners of 2009, 2021, and 2093 Gordon Street continue to have concerns with the materials provided. These additional comments provided below are not meant to be exhaustive, and where previous comments have not been addressed within the OPA 79 documents, we defer to our previous submissions.

- **Significant Woodlands** – NRSI previously provided comments regarding the mapping revisions for Significant Woodlands which have not been adequately addressed. Specifically, additional Significant Woodland areas have been added to these lands in areas that NRSI does not agree with on the basis of provincial mapping standards and existing conditions. These comments were brought forward by NRSI and were not included in the comment summary.
- **Significant Landform** – In some cases the landform line appears to be incorrectly delineated and does not reflect the topographical features to be captured by the agreed upon line. Clarification is needed as to whether in cases where this is confirmed during the EIS stage, if refinements to the line, especially corrections to the delineation, can be made without the need for a landform swap.

- **Natural Heritage System Mapping** – in some cases the mapping within the Secondary Plan is inconsistent with what has been provided in the most recent CEIS (e.g. candidate bat Significant Wildlife Habitat removals have been reflected on the OPA 79 mapping but not the CEIS; potential HDF mapping is shown despite field surveys confirming that these features do not meet the criteria for HDF, etc.).
- **Headwater Drainage Features** – NRSI provided a technical report with the results of three-season HDF surveys. We appreciate that HDFs have been removed from the Schedules and are now shown on an Appendix map, however we still maintain that 'H2' should not be considered an HDF and should not be shown on any mapping.
- **Moraine Ribbon** – We understand from the City that the Moraine Ribbon is a parkland feature and is not intended to play an ecological role. We support the position that the Moraine Ribbon does not play a necessary ecological role.
- **Ecological Linkage** – the linkage located along the north edge of 2021 Gordon Street is planned to be refined in the future. NRSI understands that this is to be completed at the EIS stage of development.

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

Sincerely,
Natural Resource Solutions Inc.



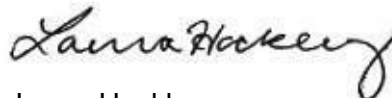
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Senior Terrestrial and Wetland Biologist



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