

May 13, 2022

1855C

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)  
2143 and 2187 Gordon Street**

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Natural Resource Solutions Inc. (NRSI) is pleased to provide the following letter on behalf of the owners of 2143/2187 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 16<sup>th</sup>, 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.

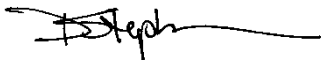
NRSI appreciates the detailed comments provided by City staff, including the number of revisions to policy and mapping within the Draft Secondary Plan and CEIS. Throughout the Secondary Plan process NRSI has provided numerous comments on the NHS and has also met with City staff to discuss these comments on several occasions. Nonetheless, NRSI and the owners of 2143/2187 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.

- **OPA 42 Settlement** – the OPA 42 settlement defined the limits of the Natural Heritage System (NHS). The City has clarified within the CEIS and Secondary Plan that the settlement will be respected, including in relation to Significant Woodlands. As per Item 8 of the proposed OPA 79 mapping, Significant Woodland limits have been expanded within the NHS boundary defined during the OPA 42 settlement process. This mapping revision was made quite late in the process with no correspondence with the landowners to indicate that such a mapping change would be made;
- **Significant Woodland buffers** – NRSI has requested clarification on whether Significant Woodland on settlement properties will require buffers, and if so, whether they would be included internal to the NHS side of the settlement boundary. Based on the revised mapping and text provided for OPA 79 and the CEIS, this remains unclear;

- **Significant Landform**
  - the addition of Significant Woodland to areas already delineated as Significant Landform has the potential to conflict with policies related to landform swapping. Clarification is required on whether areas of new Significant Woodland (not previously identified during the settlement process) can also be swapped along with landform to areas that may not contain woodland habitat;
  - notwithstanding the opportunity for landform swapping described above, 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.).
- **Plantation Policies** – NRSI has provided comments on the conflicting nature of City policies related to plantation definitions, delineation, and management that impact Clair-Maltby properties, particularly on lands with settlements where portions of plantation extend beyond the NHS limit and into areas of potential development. NRSI continues to have concerns in terms of how these policies will be addressed 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.



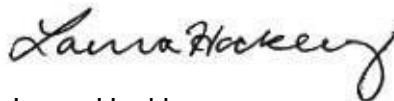
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