

June 10, 2022

Melissa MacGregor
Reid's Heritage Properties
Director of Development & Construction
1515 Gordon Street, Suite 203 , Guelph, ON. N1L 1C9

**RE: 1373 and 1389 Gordon Street Environmental Impact Study (File No: OZS22-001)
Revised Site Plan – May 2022
Request for City of Guelph to Continue Review of December 2021 Environmental
Impact Study**

Introduction

A revised site plan for 1373/1389 Gordon Street was provided to LGL Limited (LGL) May 16, 2022, by Reid's Heritage Properties (Reid's). Our understanding is that the intent of the revised site plan is to mollify concerns of local residents, City of Guelph (City) council and City staff comments expressed in regard to the January 11, 2022, OPA/ZBA submission. This revised site plan includes a building redesign from 9 storeys (98 units) along Gordon Street to 7 storeys (east wing) along Gordon Street and 4 stories (south wing) along Vaughan Street with a total of 99 units.

As the City has not yet completed a fulsome review of the submitted package, including the December 2021 Environmental Impact Study (EIS), Reid's has requested that the City continues the review of the original design in order for the applicant team to receive a comprehensive set of review comments prior to submission the revised site plan.

Upon preliminary review of the revised site plan (May 2022) there appears to be:

- Reconfiguration of parking design to facilitate a 4 storey building (south wing) north of the municipal ditch and Vaughan Street.
- Reduction of building height from 9 storeys to 7 storeys (east wing) fronting Gordon Street.
- Potential opportunities to preserve trees along the north side of the municipal swale in comparison with the December 2021 site plan (speculation, as a grading plan has not yet been provided).
- No change in underground storage volume.
- No change to the 30m wetland offset land use in comparison to the previous submission.

The submitted EIS impact assessment considered direct impacts, indirect impacts, induced impacts, and cumulative impacts regarding generalized and specific site design. All of the predicted impacts described in the EIS are relevant to the redesigned site plan and there are no

new impacts that are readily obvious. While the site plan has been redesigned, the application continues to conform to applicable natural heritage policy by avoiding sensitive habitats, accommodating the required setbacks from natural heritage features and designing mitigation to minimize or avoid impacts to the natural heritage system.

In light of the discussion provided herein the City is encouraged to continue the review of the previously submitted OPA/ZBA without concern that the revised site plan will result in additional effects to the natural heritage system.

LGL LIMITED
environmental research associates



Martin O'Halloran
Senior Fish and Wildlife Technologist, ISA Certified Arborist (ON-1088A)