

26 July 2013

Nancy Shoemaker Black, Shoemaker, Robinson & Donaldson 351 Speedvale Avenue West Guelph, ON N1H 1C6

Re: Addendum #2 to Cityview Ridge EIS

Dear Nancy,

Attached, please find a brief addendum (#2) that responds to the revised draft plan of subdivision (March 19th 2013) and discusses the potential for impacts from the proposed trail at Cityview Ridge, and responds to EAC comments.

Regarding the trail, I have described the conceptual trail alignment provided by the City, and proposed a revised alignment based on our collective analysis and the site visit. I have included a review of the relevant policies as they pertain to trails and the City's Natural Heritage System. Brooks Wickett (The Landplan Collaborative Ltd.) has provided comments on trail user experience and aesthetics. Angela Kroetsch (Gamsby and Manerrow) provided scaled drawings of the trail alignment where it descends the east-facing slope of the drumlin.

In our opinion, there are unacceptable impacts associated with the eastern section of the conceptual trail alignment proposed by the City where it descends the drumlin feature. The proposed revised alignment avoids these impacts and is not predicted to impact the natural features of the site.

Please feel free to contact me if you have any questions on this addendum.

Yours very truly,

Principal, North-South Environmental Inc.



Cityview Ridge Environmental Impact Study Addendum #2 – 26th July, 2013

Evaluation of Impact from Revised Draft Plan of Subdivision (March 19th 2013), Potential Impacts from Proposed Trail and Responses to comments provided by EAC.

Introduction and Purpose

The existing Environmental Impact Study for the Cityview Ridge application (February 2012) evaluated the potential impacts of a draft plan of subdivision dated September, 2011. A revised draft plan (March 19th 2013) has been developed in response to comments received from the City of Guelph. The revised plan principally involves the re-location of a park block, and the subsequent re-alignment of some lots. In Section 1, this Addendum reports on any environmental impacts that may result from the revised draft plan. Also, in November 2012, the City of Guelph requested that a trail alignment be identified for the proposed Cityview Ridge development that would connect the existing trail system west of Cityview Drive with potential future trails east of Watson Parkway and north onto lands proposed for residential development. In Section 2, this addendum report documents the process for determining a trail alignment and discusses the potential for impacts from the recommended alignment. Lastly, in Section 3, this Addendum responds to comments provided by the Environmental Advisory Committee (July 25th 2012), including the results of breeding birds survey undertaken in the 2013 season.

It is noted that this is the second addendum to the EIS, the first being a letter dated 13 June 2012 addressing a change in the wetland boundary in the low-lying area in the eastern part of the subject lands. None of the analysis or recommendations in this addendum affects any of the conclusions or recommendations provided in the first addendum letter.

Section 1: Review of Revised Draft Plan

Figure 1 (appended) illustrates the revised draft plan with the environmental constraints identified in the original EIS. Figure 1 in this addendum thus replaces Figure 3 in the EIS. A comparison of the two Figures shows that the revised plan is contained within the same development area as the original plan. The lot configuration on the east side of "Street 6", adjacent to the slopes and associated constraints, is identical on the two plans, thus the evaluation and conclusions provided in the original EIS (February 2012) remain unchanged:

"The resulting proposed development retains the existing natural features and conforms to the relevant natural heritage policies. The only net impact is deemed to be the loss of a single bird species that is considered locally significant in Wellington County." (page 41 in the EIS).

The revised draft plan offers opportunities for reducing impacts to the existing trees on the subject lands. The Tree Inventory and Compensation Plan (section 6.0 in the EIS) documented 100 trees in the hedgerow along the north boundary of the subject lands that would require removal owing to the grading requirements of the lots in that area. In the revised plan, a park block (Block 107) has been located on the north boundary, displacing 8 lots from the original

plan. Thus there is opportunity to retain the hedgerow trees along the north boundary in the location of the proposed park block. It is recommended that the exact number of trees that can be retained in the park block be established as part of the Environmental Implementation Report. The tree compensation plan can be adjusted at that time consistent with the formula provided in the EIS.

Section 2: Discussion of Conceptual Trail Alignment Proposed by the City

The City provided a sketch map (Figure 2 appended) that shows the alignment of the existing trail system to the west of Cityview Drive and a conceptual alignment through the Cityview Ridge Property. West of the study site, the existing trail system runs parallel to the CNR tracks then turns north to connect with an access point on Cedarvale Avenue. The suggestion from the City was to extend the trail along the north side of the tracks to the cul-de-sac at the southern end of Cityview Drive, then continue eastward paralleling the CNR tracks to Watson Parkway, with a link northward through the low-lying lands just west of Watson Parkway which would connect to the proposed subdivision to the north of the Cityview Ridge Lands. Although the intent to provide continuous connection from the existing trail system to Watson Parkway is appealing from a trail system perspective, the concept did not account for the steep wooded slope and sensitive wetland and woodland feature located in the eastern, low-lying part of the Cityview Ridge property.

Because of our concerns with natural heritage protection, the consultant team suggested that a field visit would be appropriate to review the City's concept in the field. Subsequently, a visit was undertaken on November 21st, 2012 attended by:

Jyoti Pathak , Landscape Architect, Parks and Recreation, City of Guelph; Adele Labbe, Environmental Planner, City of Guelph; Chris DeVriendt, Planner, City of Guelph; Nancy Shoemaker, Black Shoemaker Robinson & Donaldson (planner); Mirek Sharp, North-South Environmental Inc. (ecologist); and Brooks Wickett, The Landplan Collaborative Ltd. (landscape architect).

The purpose of the site visit was to walk the conceptual alignment and discuss issues and solutions, with the intent of identifying a preferred alignment.

The alignment of the trail between the existing trail system to the west of the subject lands and the edge of the steep slope on the Cityview Ridge site offers few impediments and is considered to be an appropriate location. All participants on the site visit agreed that the section of trail through Cityview Ridge where it crests the drumlin approximately halfway across the site offers spectacular views to the south across the valley containing Clythe Creek with the Turf Grass Institute in the distance; and to the east where the water tower in Rockwood is visible on the horizon.

However, the segment of the conceptual alignment located on and east of the steep slopes associated with the east-facing flank of the drumlin poses substantial issues for trail alignment. These issues include:

- policy conformity related to the section through the significant wetland and significant woodland;
- re-grading of the slope to accommodate two switchbacks for the section through cultural plantation on the drumlin slope;
- removal of a substantial number of trees as a result of the re-grading;
- the loss of trees could result in erosion issues;
- it is less likely that two of three locally significant birds species which have used the cultural plantation in the past will persist, and this would not conform to City policy; and
- a trail connection running northward, to connect to the proposed subdivision to the north of the Cityview Ridge Lands through the wooded area at the bottom of the slope, will not offer users the higher quality of visual experience (long views to the east) that a trail alignment that extends northerly, along the rear of lots 41 to 57 would do.

To fully evaluate the consequences of locating the trail on the slope, an alignment was developed to achieve acceptable grades and provide for safe use of the trail per City trail standards. This resulted in a switchback configuration (see Figure "A" appended). Figure "A" indicates the general area that would need to be cleared of trees and graded. A cross-section of the slope and trail was also developed (Figure "B" appended). Figure "B" has a 10 times vertical exaggeration to accommodate page size, and this tends to make the slope look steeper than it is. None-the-less, Figure "B" clearly illustrates the extent of cut and fill required to achieve a 2.4 m wide trail with a maximum gradient of 5%, minimum allowable curve radii and 3:1side slopes to minimize the potential for erosion.

The slope issue is compounded by the fact that it is wooded, consisting of a scots pine plantation (CUP3-1 on Figure 2 in the original EIS). Although the vegetation of the wooded slope is not significant, the slope was identified as being a component of the City's Natural Heritage System by virtue of it supporting habitat for three locally significant bird species: American redstart, Baltimore oriole and yellow-billed cuckoo (see Figure 2 in the original EIS report). American redstart is considered moderately area-sensitive. The impact analysis identified that this feature, including the bird species, would not be impacted as it was not proposed for development. A 10m buffer from the drip-line of this wooded slope was recommended in the EIS.

Below the drumlin slope, the conceptual trail proposed by the City extended through the Clythe Creek wetland before reaching Watson Parkway. This wetland is part of a Provincially Significant Wetland (PSW) complex and provides cover and protection for Clythe Creek, which is a cold water creek. The wooded area that comprises the wetland is also a Significant Woodland. The EIS for Cityview Ridge concluded the significant wetland and woodland would be not be impacted on the basis that it was not proposed for development. A 30 m buffer for the wetland was recommended in the EIS report. The EIS recommended that:

"The significant wetland, woodland, valleyland and Clythe Creek coldwater fish habitat, as well as their respective buffers, be protected per the proposed draft plan." (page 41)

Moreover, new trails are not permitted within Significant Wetland. City policy in OPA 42 notes that formalization of "existing ad hoc trails" may be permitted if:

- *i.* they are considered essential to the City's trail system or integral to the scientific, educational ,or passive recreation use of the property;
- *ii. no reasonable alternative location exists;*
- *iii. the environmental impacts of the proposed trails have been assessed and mitigated through design that minimize impacts to the natural heritage features and ecological functions; and*
- iv. where appropriate, they consist primarily of boardwalks and viewing platforms and are accompanied by educational signs. (OPA 42, s. 6.1.5.3.3, subs.5)

The same policies apply for Significant Woodlands (6.1.5.5.2 subs. 4) with the exception of (iv), which for woodlands excludes the requirement boardwalks and viewing platforms.

There are no existing *ad hoc* trails in the significant wetland and woodland, and none of the four tests are met, so it is inappropriate to align the trail through this area. As shown in Figure "A", the trail can be re-aligned to avoid conflict with the buffers of the significant wetland and woodland. However, as noted in the EIS, the wetland contains several springs that feed Clythe Creek. These springs and the organic soils along the creek are sensitive and are vulnerable to impact if exposed to increased access. It is likely that providing trail access to the low-lying lands, even if outside the buffer, will increase the probability that trail users will develop unsanctioned, *ad hoc* trails to the creek, as it is an interesting feature. This would constitute an undesirable impact from a natural heritage perspective.

There are no alternatives that extend the trail to Watson Parkway that avoid descending the steep slope. OPA 42 policies permit development and site alteration (which would include trails) in the habitat of locally significant wildlife species where an EIS demonstrates "... *that there will be no negative impacts to the local habitat that is necessary for the maintenance and survival of the species*." (6.1.6.3.3 subs.3). It is our opinion that the extent of clearing and re-grading required to descend the slope would be sufficient to substantially reduce the likelihood of two species, American Redstart and Yellow-billed Cuckoo from future breeding in the area.

2.1 Conclusions and Proposed Trail Alignment

The consulting team agrees with the proposed conceptual alignment of the trail west of the steep slopes. However, based on our own analysis and discussions with City Staff during the site visit, we conclude the alignment down the steep wooded slope is inappropriate for the following reasons:

- 1. It will require a switchback design to accommodate acceptable grades that will necessitate substantial re-grading of the slope;
- 2. The re-grading will require the removal of a substantial number of trees. Although not significant as a vegetation community the trees and under-lying vegetation stabilize the slope and provide habitat for three locally significant bird species;
- 3. Removal of the trees and re-grading may create an erosion issue on the slope;
- 4. It is unlikely two of the three locally significant birds species will continue to breed there, thus the concept is not consistent with OPA 42 policy 6.1.6.3.3 subs.3; and
- 5. Providing access to the low-lying area adjacent to the wetland may result in *ad hoc* trails being developed by trail users, with resultant negative impacts to the springs and organic soils in the wetland.

Instead, the consulting team recommends an alignment that extends northerly, along the rear of lots 41 to 57, beyond the edge of the steep slope/cultural plantation, terminating at the boundary with the adjacent lands to the north (Figure 3 appended). It is our expectation that the trail connection can be picked up on the adjacent lands and connect with the road system to the north (decisions on the road alignments on the adjacent property are pending, but there will likely be some connection to Silurian Drive or Starwood Drive). Should the conditions change in the future (*e.g.*, policy changes regarding the locally significant species, the locally significant species no longer occur, or the wooded slope is damaged by major wind storm and requires rehabilitation), then the alignment down the slope could be re-considered. There is nothing in the alignment proposed by the consulting team that precludes re-consideration of an alignment down the wooded slope in the future.

2.2 Impact Analysis of Proposed Alignment

2.2.1 Section of Trail Parallel to the Railway Tracks

There are no natural heritage features or constraints to development that conflict with the proposed alignment west of the wooded slope (see Figures 2 and 3 in the EIS report). The area occupied by this section of the proposed trail supports a hedgerow (see Figure 2 in original EIS). All but six eastern white cedar trees¹ are proposed for removal and compensation to accommodate the development, as explained in section 6.0 of the EIS. It is our opinion that these six cedar trees can still be preserved when detailed siting of the trail alignment is undertaken.

¹ Note that the EIS refers to the six cedars as being in the "eastern" end of the hedgerow. This an error and the text should read in the "western" end of the hedgerow.

2.2.2 Section of Trail behind Lots 41 to 57

This section of the trail crosses transversely through the open area in the easterly part of the stormwater block (on the outside of the bend on street 6), then parallels the rear lot lines of lots 41 to 57. The portion south of lot 57 is outside the10 m buffer for the cultural plantation and the section lots 41 to 57, is more or less coincident with the outer edge of the buffer. Trails are permitted within cultural plantation (subject to an EIS) and their buffers, thus the proposed alignment conforms to the relevant policies.

Since the trail is proposed to be located outside the cultural plantation and the steep slope, there is no potential for direct impacts. As the trail is in the buffer immediately adjacent to the rear lot lines, it is not expected to generate any additional indirect impact from its long term use than those discussed in the EIS. The EIS predicted that the three locally significant bird species will continue to utilize the site as at present and the proposed trail alignment does not change this conclusion.

It is recommended that the trail be rough-graded at the time that the retaining wall along the rear of the lots is constructed. If the trail is not going to be constructed immediately, the area should be seeded or otherwise stabilized to prevent erosion. Rough-grading at this time will minimize future disturbance to the area. Construction of the trail and retaining wall should occur outside the bird breeding season. Alternatively, if construction must occur before the mid-July, a breeding bird survey be undertaken to determine the presence of locally significant birds, and construction proceed only they are not present, or located far enough away from construction that there will be no impact. As the alignment is bounded by the retaining wall on one side and a 3:1 slope on the other, final grading and surfacing of the trail (which would be undertaken at a later date by the City), will be restricted to the width of the trail as rough-graded.

2.3 Conclusions and Recommendations

As noted in section 2, there are no additional impacts associated with the revised draft plan of subdivision (March 19th 2013).

The following is recommended regarding the proposed trail:

- 1. The trail alignment should not be located down the steep slope through the cultural plantation.
- 2. The proposed trail alignment as shown on Figure 4, located through stormwater block 112, then behind lots 41 to 57 within block 114, be accepted as the preferred alignment.
- 3. That rough-grading of the trail be undertaken when the retaining wall behind lots 51 to 57 is constructed.
- 4. The rough-graded trail should be seeded or otherwise stabilized if final trail construction is not going to occur immediately.
- 5. That construction of the trail and retaining wall occur outside the breeding bird season (mid-May to mid-July), unless it is demonstrated through a breeding bird survey that no locally significant species are present or if present are distant enough from the

construction area that they will not be affected.

6. That <u>the trail just east of Cityview Drive be located to avoid removal of the six eastern</u> <u>white cedars identified</u> for retention in the EIS.

Section 3: Response to Comments Provided by the Environmental Advisory Committee (25th July 2012)

EAC Comment: Plant Nomenclature

With respect to the comment from the Guelph Field Naturalists, both Highbush Cranberry (*Viburnum trilobum*) and European Highbush Cranberry (*Viburnum opulus*) occur on the study site and no error was made. We acknowledge that the Alder-leaved Buckthorn (*Rhamnus alnifolia*) we reported should have been Glossy Buckthorn (*Frangula alnus*). This does not affect any of the analysis or conclusions in the report.

EAC Comment: Breeding Bird Survey in Eastern Plantation

Breeding bird surveys were completed within the CUP3-3 (Scotch Pine Coniferous Plantation) community adjacent to Watson Parkway North per EAC's request. The first survey was completed on May 30, 2013 between 0545 and 0645. Weather conditions were conducive to surveying breeding birds, wind being low (1 on the Beaufort Scale) and no precipitation. The second survey was completed on June 18, 2013 between 0630 and 0730. As in the first survey, weather conditions were suitable for surveying breeding bird activity. Winds registered at 2 on the Beaufort Scale and although cloud cover was high (nearly 100%) precipitation did not occur. Bird activity and singing was high on both mornings that breeding bird surveys were completed. Area searches were completed within the CUP3-3 community, however, auditory observations from adjacent lands and habitats were also recorded.

A total of 17 bird species were noted during the survey periods. Five of these species: Killdeer, Common Yellowthroat, Mourning Dove, Red-winged Blackbird and Gray Catbird were only heard singing from adjacent habitats off-site (i.e., the stormwater management pond located to the northeast of Watson Parkway North, or ditches along the Parkway).

Seven bird species were heard singing within the Scotch Pine community: Blue Jay, American Crow, Black-capped Chickadee, White-breasted Nuthatch, American Robin, Northern Cardinal, and American Goldfinch. All of these species are considered to be either possibly or probably breeding. Black-capped Chickadee were particularly abundant, as were American Robin.

Four bird species were heard singing from the edge of the Scotch Pine community along the border between CUP3-3 and CUT1: House Wren, Yellow Warbler, Song Sparrow and Baltimore Oriole. An American Redstart was heard singing from within the adjacent Cultural Thicket.

The only species found not reported in the EIS (North-South Environmental 2012) were Whitebreasted Nuthatch and House Wren. These species are relatively common in urban areas where there is suitable habitat. Although White-breasted Nuthatch is considered area-sensitive by MNR, it is on the lower end of the continuum of area-sensitivity, and is found in well-treed residential neighbourhoods and adjacent small natural areas. House Wren is relatively common in shrubby urban natural areas and among houses where there are appropriate shrub plantings. Two of the species found, American Redstart and Baltimore Oriole, were discussed in the EIS report as they are locally significant. Neither was located in the area to be developed, the oriole being approximately 30 m away from Block 115 (the apartment block) and the redstart 75 m distant. Neither species would be expected to breed in dense Scotch Pine plantation. As noted in the EIS, we expect the oriole to continue breeding in the open woodland that will remain on the site. The redstart will likely continue to breed in the early successional areas unless they mature into more wooded communities. This species is found throughout the Clythe Creek floodplain where abundant suitable habitat still persists, including, for example, the floodplain habitat adjacent to the cleared site east of Watson Parkway. All the other species noted are also expected to continue using the undeveloped areas of the site.

EAC Comment: Clarification of Top of Slope setback on Figure 3

Figure 3, as provided in the EIS report, does show the 7 m setback, however we have refined the legend to more clearly reflect this. The revised Figure 3 is attached.

EAC Comment: Identify Opportunities for Tree Preservation in the EIR

We will identify opportunities for tree-saving as part of the EIR. The main opportunity for this will be along the northerly lot line and will need to be done with cooperation with the adjacent landowner.



Cityview Ridge EIS Addendum

Figure 1: Revised Draft Plan (Mar 2013) and Environmental Constraints

Legend

\sim	Wetland Boundary (Verified with GRCA, June 12, 2006 and refined May 25, 2012)
n.	Wetland - 30m Buffer
64	Significant Woodlands - 10m Buffer
\sim	Significant Woodlands
\sim	Clythe Creek
\sim	Clythe Creek - 30m Buffer
\sim	Cultural Plantation Boundary (staked and surveyed March 30, 2009)
~ 10	Cultural Plantation Boundary - 10m Buffer
\sim	Top of Slope (per Naylor 2012)
Ch.	7m Top of Slope Setback (per Naylor 2012)
eres.	Significant Valleyland and 100 Year Floodplain
\sim	Regional Floodline
\sim	Approximate "Steep Slope Valley" and "Steep Slope Erosion" (from GRCA on-line mapping November 16 2011)
	Recommended Natural Heritage System
	Streets
	Lot Layout
	Study Area
N	
~\$>	Specialists in Sustainable Landscape Planning
2	

July 18, 2013

Figure 2: Conceptual Trail Alignment Provided by City of Guelph





Cityview Ridge EIS Addendum Figure 3: Proposed Trail Alignment

Legend

Proposed Trails

\sim	Proposed Trail Alignment (Approximate)
and the second	Eastern Trail Alignment Proposed by the City of Guelph (Approximate)
\sim	Wetland Boundary (Verified with GRCA, June 12, 2006 and refined May 25, 2012)
-	Wetland - 30m Buffer
Charles .	Significant Woodlands - 10m Buffer
\sim	Significant Woodlands
\sim	Clythe Creek
\sim	Clythe Creek - 30m Buffer
\sim	Cultural Plantation Boundary (staked and surveyed March 30, 2009)
\sim_{\sim}	Cultural Plantation Boundary - 10m Buffer
\sim	Top of Slope (per Naylor 2012)
-	7m Top of Slope Setback (per Naylor 2012)
en esta	Significant Valleyland and 100 Year Floodplain
\sim	Regional Floodline
\sim	Approximate "Steep Slope Valley" and "Steep Slope Erosion" (from GRCA on-line mapping November 16 2011)
	Recommended Natural Heritage System
	Streets
	Lot Layout
	Study Area
N S	North-South Environmental Inc. Specialists in Sustainable Landscape Planning
	July 2, 201





Gamsby and Mannerow ENGINEERS



Figure B

ALTERNATIVE TRAIL ALIGNMENT AND CONNECTION TO WATSON PARKWAY

SCALE = H 1:1000 V 1:100 JANUARY 2013

