

Item	89 Beechwood Avenue Environmental Implementation Report
Proposal	The development proposed is a combination of single-storey and 2-storey 22 unit townhouse building complex with driveway access off of Beechwood Avenue and internal at-grade parking.
Location	The site is located on the west side of Beechwood Ave and is roughly 0.4 ha in size. It is south of Howitt Park and includes an existing building (the Optimist Club of Guelph). The existing City trail wraps around the site and crosses the corners of the subject site. See attached map.
Background	<ul style="list-style-type: none">▪ The site is located in the Howitt Creek/ Silver Creek Subwatershed;▪ The City's Official Plan designates the site as general residential with significant natural area boarding the site;▪ The significant natural area designation is due to significant woodland, intermittent and undetermined fish habitat, and significant valleyland associated with the Howitt Creek stream corridor.▪ The site also includes individual trees including mature street trees fronting onto Beechwood Ave and adjacent City/private property.▪ An original proposal was received in 2017. The purpose of the original proposal was to change the zoning from "Commercial Recreation Park" (P.5) to a "Specialized Residential Cluster Townhouse" (R.3A-?) Zone to permit the development of 34 residential townhouse units.▪ In 2018, the applicant submitted a revised development proposal for the property. The revised development proposal included 23 residential townhouse units.▪ A Decision Report (IDE-2018-114) was presented to Guelph City Council in September 2018. Staff provided an approval recommendation in the report; however, Council referred the Zoning By-law Amendment application to City staff for additional consideration and consultation with the applicant. The issues leading to this approach were not related to natural heritage.▪ In response to the issues, the applicant revised the proposal to its current form. A Supplementary Decision Report (IDE-2019-08) for a Zoning By-law Amendment to change the zoning on the site from the "Commercial Recreation Park" (P.5) Zone to a "Specialized Residential Townhouse with Holding Provisions" (R.3A-62(H)) Zone to permit the development of 22 residential townhouse units and to a "Specialized Community Park" (P.3-3) Zone, to recognize a portion of the existing City trail was approved by Council in January 2019. That decision has been appealed to the OMB. The issues leading to the appeal are not related to natural heritage.

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- The EIS for the original proposal was brought to EAC in October 2017 and was conditionally supported subject to the preparation of an EIS addendum that:
 - Provides an impact analysis regarding necessary trail relocation/realignment
 - Explores a SWM approach that avoids the need for an outlet to Howitt Creek
 - Includes an impact analysis that provides additional information regarding a proposed outlet (if it is unavoidable) that includes: anticipated changes in flow regarding baseflow and flood flow conditions for Howitt Creek; a SWM treatment train approach that considers water quality (including thermal and chloride) impacts; clarifies the location of a proposed outlet and the associated impacts and mitigation measures required
 - Addresses how separation from the groundwater table from the proposed development is being achieved
 - A revised TIPP that preserves trees on and adjacent to the site which contribute to the City's urban forest
 - Includes buffer analysis that considers protection of woodland/wetland function as well as form
 - Provides a revised map 3 to identify existing natural features within 120m (ELC ecological linkage, etc.)
 - Includes methods used for field studies and effort allocated
- Two EIS addendums were submitted in support of the re-zoning application and the proposal was revised to eliminate the underground parking and the stormwater outlet to Howitt Creek.
- City Engineering has reviewed and provided comments on this submission. Concerns related to natural heritage include lack of clarity on the water balance and ensuring proper functioning of the proposed infiltration gallery.
- GRCA has not yet provided comments on the EIR.

Comments

Staff have reviewed the Environmental Implementation Report (June 2019) prepared by NRSI as well as the supporting Stormwater Management Report (June 26, 2019) prepared by MTE and offer the following comments:

- The water balance information included is from the EIS; however, the updated water balance varies significantly. A summary and associated impact analysis of the updated water balance contained within the 2019 Stormwater Management Report is required. The updated analysis should indicate what lead to the changes and demonstrate that the new water balance will not negatively impact the NHS. Note that this comment affects Section 2.1 and 2.4 of the EIR.

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- A discussion on the design of the infiltration gallery and its suitability adjacent to the NHS and City trail is required. Potential impacts to the adjacent City trail and proposed naturalization area over the long-term and appropriate mitigation should be included.
- The discussion in Section 2.4.2 related to buffers is from the EIS; however, this information was amended in a July 20, 2018 NRSI memo in response to City comments. This outdated information should be revised to reflect the information contained within the memo.
- The updated Tree Inventory and Preservation Plan (TIPP) in Appendix III indicates that 5 City trees within the Beechwood Avenue ROW are proposed for removal. As per previous comments, compensation for their removal at a 3:1 ratio is required. To make up the 15 required replacement trees, as many should be placed in the ROW as possible (currently none are proposed) with the remaining in the adjacent park. Additionally, revise Table 1 in the TIPP to separate the ROW trees from the remainder in order to determine the necessary compensation for the private trees proposed to be removed. Further, provide clarity on where the tree and shrub compensation plantings for the private trees indicated in Table 1 are proposed.
- The approach for the naturalization area of the Edge Management Plan is not clear. As this is City parkland, a typical detailed landscaping prescription (i.e. number and location of plants, stock sizes, notes, etc.) should be submitted (note that the approach for the forest restoration area is acceptable). Provide clarity on the following:
 - 12 trees appears very high for the limited space
 - Treatment for the Norway Maple stumps to ensure re-growth does not happen. Grinding is preferred to maximize naturalization efforts.
 - Maximized herbaceous cover and aesthetics.
 - Coordination with landscape plans which propose a seed mix
 - Removal of White Elm from the plan.
- A number of items from the proposed monitoring plan are not clear or are missing:
 - The buffer disturbance monitoring appears to include the woodland edge. This is supported but should be clarified.
 - Performance monitoring for the infiltration gallery is missing.
 - Contingency measures as appropriate should the monitoring reveal issues are missing.
- It is not clear which information in Appendix VI is intended for the educational brochure and which is intended for the educational signs. Some of the information does not appear specific to the Howitt Creek Significant Natural Area including a reference to Elora's natural

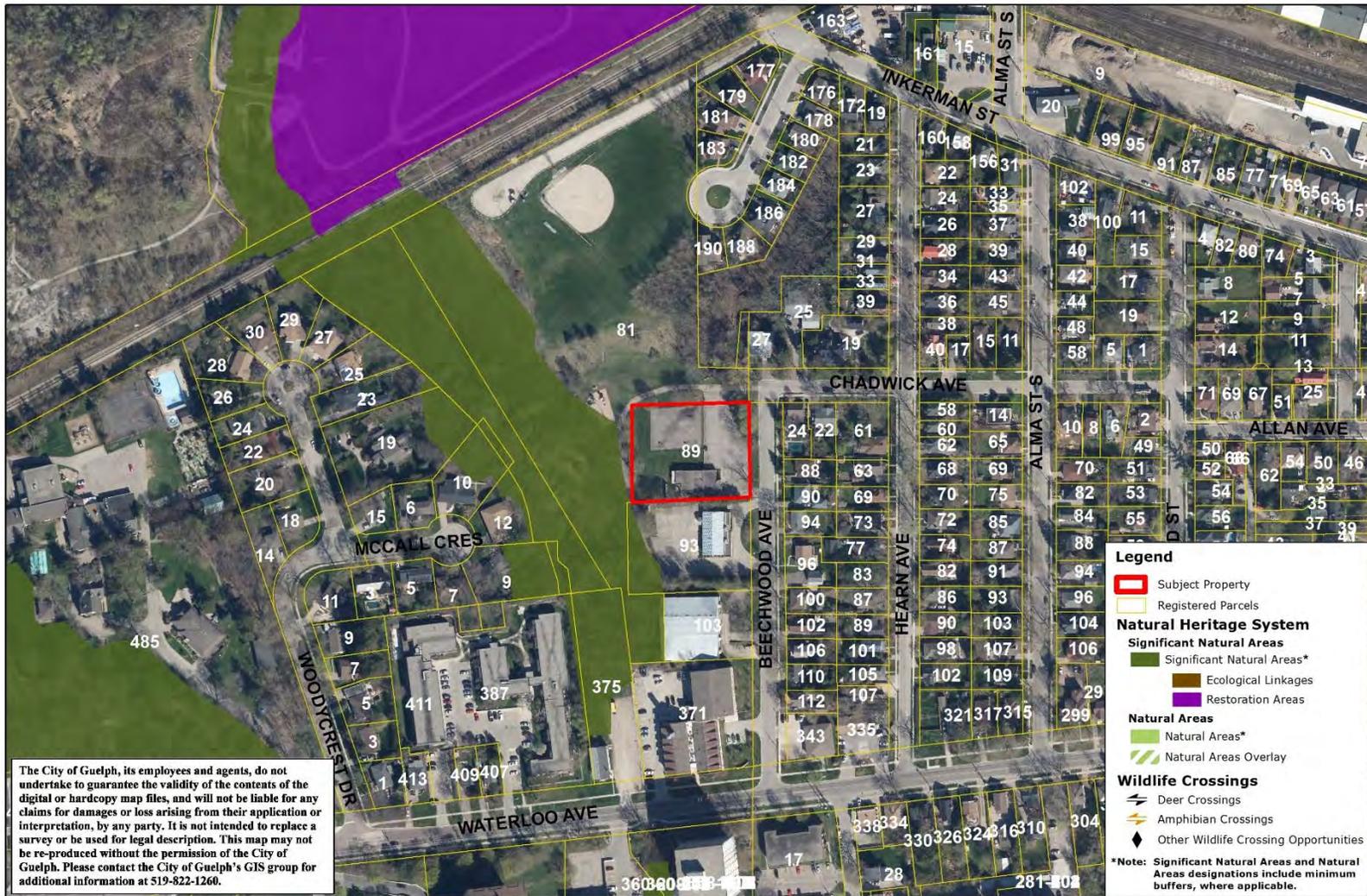
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- environment. The educational signs must be on the landscape plans (location and details) in an appropriate format.
- Glyceria bebbii on the landscape plans is an unknown species and should be revised.
 - To ensure implementation, please provide a checklist in the EIR that summarizes all recommendations/commitments and notes where additional details can be found within the report (e.g monitoring, edge management, educational brochure, etc.).

Suggested Motion

Staff recommends that the Environmental Advisory Committee conditionally support the EIR for 89 Beechwood, prepared by NRSI, subject to the preparation of a revised version that:

- Summarizes and provides an associated impact analysis of the updated water balance contained within the 2019 Stormwater Management Report. The updated analysis should indicate what lead to the changes and demonstrate that the new water balance will not negatively impact the NHS.
- Discusses the design of the infiltration gallery and its suitability adjacent to the NHS and City trail.
- Replaces Section 2.4.2 related to buffers is from the EIS with the amended information from the July 20, 2018 NRSI memo.
- Revises the TIPP to provide clarity on the compensation requirements for the City owned ROW and privately owned trees that are proposed for removal.
- Provides additional clarity and specification for the naturalization area of the Edge Management Plan.
- Revises the monitoring plan to include performance monitoring for the infiltration gallery and contingency measures as appropriate for all monitoring items.
- Provides more clarity on the educational brochure and signage including revisions to ensure they are specific to the Howitt Creek Significant Natural Area.
- Provides a checklist that all recommendations/commitments and notes where additional details can be found within the report.

Attachment 1 – Site Map and NHS limit



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Natural Heritage System

Natural Heritage System

As approved by the Ontario Municipal Board, June 4th, 2014.

89 Beechwood Avenue

2016 Aerial Photography

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