

Comment	Response	Reference
71 Wyndham S EIS: Comments dated Sep 13, 2017		
1. Overall, staff found that the various reports do a good job at characterizing the site in context of the City's policies. The impact analysis could improve from integration between disciplines. The following specific information is missing in the EIS as it relates to meeting the set Terms of Reference:	Integration between disciplines was implemented throughout the updated EIS	EIS
a. Through the TOR, staff indicated that a particular focus be placed on investigating opportunities for enhancement and restoration of the Natural Heritage System particularly in relation to aquatic and riparian habitat.	Restoration opportunities have been identified within the EIS, including city owned lands beyond the Subject Property.	Throughout the EIS. See section 6.3
b. In order to inform design of the floodway/valleyland and trail within it, it was requested to include the following information: flood elevation for the 2-yr to 25-yr flood events, velocities through the floodway for the 2-yr to regional flood.	Flood elevations have been updated within the EIS.	Throughout the EIS. See section 4.4
c. During review of the TOR, it was determined that a pedestrian level wind assessment would be undertaken which could inform any wind impacts to the natural environment (i.e., river side of the building). A specific wind-wildlife assessment was not requested, but it was expected that the impact analysis would speak to potential micro-climate impacts.	Potential micro-climate impacts have been incorporated into the EIS.	Throughout the EIS. See section 7.1.4
2. Engineering has requested that the water balance assessment will need to be updated using University of Guelph Arboretum Temperature and Precipitation from 1971-2000.information. In addition, TDM has requested additional information as it relates to traffic analyses as well as bicycle parking and storage.	The water balance assessment has been updated using UOG data from 1971-2000.	See Appendix C of the EIS
3. Parks Planning staff have requested additional detail such as spot elevations adjacent to the proposed trail alignment, flood elevations for various storm events and recommendations for a hazard tree assessment to inform the trail design, some of which can be provided with an Environmental Implementation Report (i.e., hazard tree mitigation). It should be noted here that the intent for the trail is to serve as an Active Transportation Network trail which will be 2.4 m wide asphalt paved surface with 0.5 m of mow strip on either side. Environmental Planning staff would like to explore the opportunity to add some meander to the trail to allow for a more interesting space and increased opportunity for restoration.	Adding meander to the trail will be explored. Spot elevations are provided with the grading plan on both sides of the path. Contours with elevations are shown on areas outside the path which provides context of the existing ground in the vicinity of the path.	Grading Plan C-400. Appendix H of the EIS
4. Consistent with City policy, staff encourage the owner to dedicate the floodway to the City.	No action required for the EIS.	
5. The Hydrogeological Study has been reviewed by Environmental Planning staff. It is notable that clay cut-off collars are recommended where services are below the seasonally high groundwater table to mitigate any changes to groundwater flow paths. As well, an increase in infiltration over existing conditions is predicted based on the reduction of impervious area (94% to 75%). A Hydrogeology Peer Review is being coordinated to support this application. In this regard, the following questions are raised by Environmental Planning staff:	No action required.	
a. Will the proposed parking garage be installed below the severely fractured limestone bedrock?	Yes.	EIS Section 6.0
b. Will the parking garage require a long-term water mitigation strategy as it relates to groundwater seepage/dewatering?	No.	EIS Section 6.0
c. The report indicates that there is potential for dewatering to be notable. Is there potential for short-term or long-term impacts to impacts groundwater seepage/discharge to the Speed River/Fish Habitat (spawning, rearing, foraging, over-wintering) or to river levels as result of the proposal?	Potential groundwater discharge is considered to be negligible.	EIS Section 4.3.2, 7.2.4
d. What is the seasonally high groundwater table elevation? (Note: at time of reporting data had been collected into April)	Spring Freshet (early March to early May).	EIS Appendix C

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<p>e. Is there an optimal timing window during which dewatering activities for construction should be planned? For example, during the winter months, the Wellington Dam is typically open and the Guelph Lake Dam is typically closed, as such it may be best to plan for dewatering activities to be restricted to winter months to minimize/avoid potential impacts to fish habitat and surface water as a result of dewatering. Are there any deep over-wintering pools that would be at risk if dewatering activities were restricted to winter months?</p>	<p>There are no preferred timing windows for dewatering activities.</p>	<p>EIS Section 8.2</p>
<p>6. The Fluvial Geomorphology Report has been reviewed by Environmental Staff. Unless concerns are otherwise noted by committee, there is no intent to get this study peer-reviewed. The following questions and comments are provided in relation to that report:</p>	<p>No action.</p>	
<p>a. How many existing outfalls are present within the reach being characterized?</p>	<p>The reach characterized extends from the Wyndham Street bridge to the area downstream of the point bar on the left bank, a distance of approximately 200 m. There were three (3) outfalls observed along the left bank:</p> <ol style="list-style-type: none"> 1. Diameter approx. 300 mm; located at downstream end of concrete abutment at Wyndham Street bridge. Invert is approximately 1 m above low flow stage. 2. Diameter approx. 300 mm; located on concrete retaining wall approximately 10 m upstream of northwest corner of subject property; Invert approx. 1 m above low flow stage 3. Diameter approx. 400 mm; located downstream of point bar. Invert located approximately at the low flow stage. 	<p>EIS Appendix D</p>
<p>b. What is the high water mark elevation?</p>	<p>The bankfull stage, which in stable (threshold) systems is equivalent to a 1:1.5 year flow event, may be identified in the field using morphological indicators. The bankfull stage was interpreted at this site as being the top of the point bar feature (i.e., where the point bar intersects the base of the riverbank). The bankfull stage along the subject property is approximately 308.5 to 308.8 m.</p> <p>The 1:5 year flood stage is estimated to be 309.7 m along the project site.</p>	<p>EIS Appendix D</p>
<p>c. The EIS speaks to a moderately sized pool. From a fisheries perspective is this potential over-wintering habitat that should be managed during the construction (i.e., if dewatering occurs during winter)?</p>	<p>There are no preferred timing windows for dewatering activities.</p>	<p>EIS Section 8.2</p>
<p>d. The outfall proposed to service the development is upstream of the point bar deposition area entering at an angle to the Speed River flow path. Please confirm there are no potential impacts to the point bar with this location and the anticipated 1.22 cubic metres/sec outlet rate for the 1:5 year event.</p>	<p>The proposed outfall is expected to be submerged during the 1:5-year event and therefore the impact on the Speed River is expected to be minimal. The invert of the proposed culvert will be 308.4 m. The predicted flood stage during the 1:5 year event is approximately 309.7 m, more than 1 m higher than the invert of the proposed outfall.</p>	<p>EIS Appendix D</p>
<p>e. Is there opportunity to integrate the 71 Wyndham Street outlet with the existing out let that is found downstream of the point bar?</p>	<p>Access to the existing outfall would require the securing of easements over 2 adjacent properties to the south to gain access. The existing pipe is approximately the same diameter as the proposed outlet to service the 71 Wyndham Street South site thereby requiring a reconstruction effort to increase pipe size to the river which would also result in an increase in outflow rate at this location. The reconstruction of the existing outfall will also impact existing large diameter trees whereas the proposed outfall locations anticipates no impact on existing trees. These constraints and impacts support the proposed location of the new outfall on the 71 Wyndham Street South site.</p>	<p>EIS Appendix D</p>
<p>f. Staff acknowledge the portion of a retaining wall offsite that is failing and have relayed this information internally.</p>	<p>No action.</p>	

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<p>g. What opportunities for restoration exist on the subject property and on the adjacent City property that currently include the stream bank? Please make some recommendations for river restoration (geomorphological and fish and aquatic habitat) that can be considered through the proposal.</p>	<p>The point bar and adjacent bank are already well-vegetated (herbaceous cover, shrubs, trees, and large woody debris) and provide good riparian habitat. Bedrock substrate in the Speed River further limits restoration opportunities (Wright and Imhof, 2001). However, there may be opportunities to improve fish and aquatic habitat by:</p> <ol style="list-style-type: none"> 1. Reducing or eliminating the flow of surface water into the Speed River from the existing gravel parking lot at 71 Wyndham Street. Uncontrolled drainage from the parking lot appears to contain sediment, as evidenced by small areas of sediment deposition observed on the point bar. 2. Removing trash that was observed on the point bar and adjacent river bank, and 3. Planting additional trees along the top of the river bank. 	<p>EIS Appendix D</p>
<p>7. A change in the angular plane from the Speed River from the required 40 degrees to 60 degrees is being sought. It should be noted that that building design on the river side does include multiple step backs to mitigate concerns of canyon effects.</p>	<p>No action.</p>	
<p>8. Development is not permitted within the Floodway, only within the Special Policy Area. A minimum 16.1 m development setback is proposed, however it is not clear where it is measured from (property line? Top of stream bank?), also note the FL zone represents the Floodway (not floodline). The floodway line needs to be georeferenced and tied to a location on the ground in order to facilitate site plan design and approval. Furthermore, no development or structures are permitted within this space (i.e., no balconies/terraces or stairways projecting into this zone). Clarification and additional metrics between the property line and the floodway zone line would be helpful.</p>	<p>The building setback to the top of slope is 18.5 m at closest approach</p>	<p>EIS Section 8.1</p>
<p>9. The policy analyses and conclusions in the EIS are confusing as in some areas of the documents the wrong Official Plan document is being referenced. It should be well-understood that OPA 42 is in full effect and fully integrated into the current September 2014 OP consolidation. Natural Heritage System policies apply to this application, the Greenland System is no longer in effect. In fact, it is through NHS policies that staff flagged during the TOR stage that this EIS should focus on opportunities for restoration of the Significant Valleylands (floodway) and fish habitat.</p>	<p>Policy improvements have been implemented throughout the EIS</p>	<p>Multiple sections of the EIS. See Section 2.2.</p>
<p>10. Provide a post development NHS designation map which clearly illustrate all Significant Natural Areas, as well as the floodway line, and provide the digital files consistent with Section 3.6 of the City's Guidelines for Preparation of an EIS document (include excel sheets of wildlife lists).</p>	<p>Figure 5 has been updated.</p>	<p>EIS Appendix A</p>
<p>11. Revise section 3.2.2 and 5.5.4 and all other references to wildlife movement which confuse the Greenlands System policies and definitions with the NHS policies. The Speed River is a significant wildlife movement corridor /ecological linkage.</p>	<p>Policy improvements have been implemented throughout the EIS</p>	<p>Multiple sections of the EIS. See Section 2.2.</p>
<p>12. Table 3-4 should be titled for turtles not waterfowl. Please revise.</p>	<p>Updated</p>	
<p>13. The EIS needs to be clear in how it determines that identified woodlands and wetlands do not meet the criteria for designation in the Natural Heritage System, even if these communities are within the floodway and not developable. Provide additional analysis that allows the reader to follow the logic as to why the identified communities are not part of Cultural or Significant Woodlands or Provincially Significant, Locally Significant or Other Wetlands.</p>	<p>There are no landscape-level wetlands on or within 120 metres of the Subject Property. The shoreline of the Speed River adjacent to the Subject Property has a 0.05 ha wet area, which does not fall under any category (including other wetlands) per the City NHS, which uses a minimum size criteria of 0.2 ha.</p> <p>There are no landscape-level woodlands on the Subject Property. An elongated 0.2 ha wooded community dominated by Manitoba Maple is found south of the Subject Property, paralleling the Speed River. This feature is not considered a woodland (including cultural woodlands) per the City NHS, which uses a minimum size criteria of 1 ha.</p>	<p>EIS Section 5.2, 5.3</p>
<p>14. In Section 5.0, the natural heritage features should be discussed in the context of the City's NHS policies (i.e., Surface Water and Fish Habitat). There should be recognition here for the policies which speak to restoration opportunities.</p>	<p>Restoration oppurtunities have been improved/updated.</p>	<p>EIS Section 5.0</p>

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15. Revise the species lists to include a column for local significance. Utilize the City's Locally Significant Species list and assess whether any locally significant species are utilizing the site or study area. Include a new section in the Report which discusses the analysis in the context of policies for habitat for significant species.	No locally significant species were observed. A column has been added.	EIS Appendix E
16. Impact Analysis: Revise section 7.0 as discussed below.	No Action	
a. The impact analysis is framed as the development being an improvement over existing conditions because there will be a reduction in impervious surface. However, the discussion doesn't speak to the assessment in the FSR which indicates a change to the runoff system. The water balance hydrograph shows an increase in runoff volume over the existing condition. Is this correct? Assess the increase in runoff in the context of surface water (i.e., the river) and fish habitat and suggest mitigation and/or opportunities for enhancement and restoration.	The EIS has been updated to improve clarity between the documents.	EIS and associated project files.
b. Independent of the comment above, it should be recognized that the existing impairment of the site presents opportunities for enhancement and restoration consistent with the goals and objectives of the City's OP.	Updated.	EIS Section 6.1.1, 6.2
c. Cumulative impacts are not discussed in the EIS. In this context a focus should be placed on the river system and fish habitat (thermal, water quality and quantity), considering the planned intensification in the Downtown area, the changes in future temperature and precipitation patterns as well as the fisheries management objectives and natural heritage system policies. The existing fish community includes warm and coolwater species. The management strategies for the urbanized reaches of the Speed River, as indicated in the Grand River Fisheries Management Plan, recognize potential limitations and opportunities including opportunities to re-establish a limited cool and coldwater fish community through and downstream of Guelph. This is envisioned through tactics such as removal of fish barriers, rehabilitating degraded habitat, enhancement of water quality, improvement of over-wintering habitat and potential introduction of fish species. It is our commitment to ensure that successive developments in Guelph do not preclude these objectives.	A cumulative impacts section has been added to the EIS	EIS Section 10.3
d. What are the potential wildlife conflicts that may present themselves on site as a result of location and how are they proposed to be mitigated and managed. For example, the river is a waterfowl overwintering area and support breeding of geese and potentially other duck species. How is the design of the floodway going to ensure human-wildlife conflicts are minimized and natural functions are optimized?	Human-wildlife conflict potential and mitigation measures have been added to the EIS.	EIS Section 7.2.2.4, 8.8
17. Mitigation measures:	No action.	
a. Note that a Salt Management Plan has been prepared and will become part of the Site Plan Agreement.	No action.	
b. Buffers: What is the proposed buffer width? Is there sufficient science to support this buffer width as being enough to protect fish habitat and surface water? Please provide some scientific support for the recommended buffer width and consult the policy framework to discuss limitations of the proposed buffer width in section 8.1. Include in the discussion what the buffer width will include: a trail and specific restoration opportunities.	Beacon (2012) found significant support of a 15 m buffer to preserve water quality and quality, as well as the preservation of natural habitat functions for watercourses (see Beacon (2012) for fourteen supporting studies) Beacon. 2012. Ecological Buffer Guideline Review. 139pp. Available online at http://www.creditvalleyca.ca/wp-content/uploads/2013/08/Ecological-Buffer-Guideline-Review.pdf accessed September 20, 2017.	EIS Section 8.1
c. Discuss mitigation techniques that can assist in reducing risk of cumulative impacts to surface water and fish habitat and support the implementation of the Fisheries Management Plan.	Mitigation measures have been updated throughout.	EIS Section 8.0
d. Discuss mitigation techniques to minimize/avoid impacts associated with human-wildlife conflicts.	Human-wildlife conflict mitigation has been added.	EIS Section 8.8
e. The EIS should recommend Education and Outreach material for the new residents that relates to: river systems and fish habitat, emergency preparedness and response and specific information about the design of the floodway on site.	The EIS has been updated to recommend outreach opportunities.	EIS Section 8.8
18. Restoration Opportunities: Based on the characterization of the existing conditions, the understanding that this site was historically a floodplain attenuating water, providing quality	Restoration and enhancement opportunities have been updated throughout the EIS.	EIS Section 6.3

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enhancement to the Speed and fish habitat, what restoration opportunities exist within the proposed buffer and floodway?		
a. Are there opportunities to address any invasive species present within the reach's riparian zone, where public ownership exists?	There is potential for invasive species removal from the Subject Property and adjacent city owned lands.	EIS Section 6.3
b. What opportunities exist to restore surface water and fish habitat and support the implementation of the Fisheries Management Plan? Include consideration of the entire riparian zone in this area (i.e., City-owned lands). Discuss.	Opportunities and discussion for surface water and fish habitat restoration have been updated throughout the EIS.	EIS Section 6.3
c. Staff recommend that Low Impact Development techniques be proposed to mitigate potential impacts/provide opportunity for restoration for fish habitat and surface water and Significant Valleylands. If infiltration design LID techniques are not possible other techniques should be considered (storage and conveyance) for small events including but not limited to a vegetated roof, rain gardens, soil amendments within the floodway and a landscape design within the floodway that supports natural hydrologic and ecologic function.	Low impact development opportunities have been updated within the EIS.	EIS Section 6.2
d. Include, at minimum, principles and goals be set out in the EIS to direct the detailed restoration design of the floodway as it relates to geomorphology, riparian vegetation, fish and wildlife habitat (including pollinator habitat), trail location and water management. The principles could include the need for creative design solutions recognizing the site is in the downtown core and that there is no retaining wall.	Restoration opportunities have been updated throughout the EIS.	EIS Section 6.3
19. Tree Inventory and Preservation Plan (TIPP)	No action.	
a. Identify tree ownership in the tree table.	Updated.	EIS Appendix G
b. At the Site Plan stage, the TIPP may need to be updated to reflect the restoration plan.	No action.	
c. The City acknowledges the recommendation regarding removals within the floodway and access provision/timing.	No action.	
20. Revise section 10. Monitoring and Recommendations to include any additional recommendations as result of revisions.	Conclusions have been updated in accordance with all recommended edits.	EIS Section 10.0
a. Staff suggest scoping in post-development monitoring for bird strike mitigation, for the stormwater outlet and for the restoration design of the floodway.	Updated as applicable to the EIS. Post-construction monitoring to be confirmed at the site plan stage.	EIS Section 9.0
b. Based on the completeness of the resubmission (i.e., revised EIS) Staff will determine if an Environmental Implementation Report is required or whether a more scoped undertaking can be included as part of the Site Plan process.	No action.	
Suggested Motion - Staff recommends that the Environmental Advisory Committee and River Systems Advisory Committee conditionally support the Scoped Environmental Impact Study prepared by Stantec subject to the following:		
THAT the EIS and supporting documents be revised to the satisfaction of City staff and include: 1) The correct policy references to the City's current September 2014 Official Plan Consolidation throughout the entire EIS.	As noted above, updated throughout.	
2) Hydrology information (flood elevations and velocities) and analysis is provided to support the proposed development design of the site particularly as it relates the trail and restoration design within the floodway;	As noted above, updated information has been provided.	
3) A focus on opportunities for enhancement and restoration of the Natural Heritage System particularly in relation to geomorphology, riparian vegetation, fish and wildlife habitat (including pollinator habitat), trail location and water management, including, at minimum, principles and goals to direct the detailed restoration design of the floodway. Include consideration of the subject property and adjacent City-owned lands within the Floodway.	As noted above, updated throughout.	

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4) Investigation of the possibility of coupling the storm outlet with an existing location as it relates to potential long-term impacts to surface water and fish habitat.	As noted above, a new outlet is anticipated to provide the lowest overall impact.	
5) Clarity around the proposed development setback and where it is located, as well as updated Natural Heritage System mapping and required digital files.	As noted above, updated throughout.	
6) Additional information to support how the identified features do not meet the criteria for designation under Cultural or Significant Woodland and Provincially Significant, Locally Significant or Other wetlands.	As noted above, updated throughout.	
7) A revised species list which includes analysis of locally significant species and an added section in the EIS which speaks to Habitat of Significant Species.	As noted above, updated in Appendix E.	
8) Additional impact analysis that includes specific consideration for the proposed changes to hydrology (including runoff), cumulative impacts including future development in and around the river downtown and consideration for changes to future temperature and precipitation trends, impacts to microclimate on the river side of the development and potential human-wildlife conflicts, as well as measures to mitigate any potential impacts.	As noted above, updated throughout.	
9) Additional analysis related to the proposed buffer width being adequate and supported by science and the policy framework.	As noted above, updated throughout.	
10) Mitigation measures to influence behavior such as education and outreach materials.	As noted above, updated in Section 8.8.	
11) Consideration be given to including LID techniques, particularly a green roof, to mitigate potential cumulative impacts and to preserve opportunity for the City to restore the river to provide habitat for cool and some coldwater species.	As noted above, updated throughout.	
EAC and RSAC Motions:		
12) Consider a no salt policy for this site and the surrounding public site as part of the updated EIS.	In accordance with the City of Guelph's requirements, a private Salt Management Plan has been developed for the Subject Property, and is provided in Appendix H. At the request of the City Environmental Advisory Committee, preparation of the final site plan will investigate the possibility of devolving the property into a no-salt location.	EIS Section 8.6
13) Consider a chemical and pesticide management policy including restrictions on automotive maintenance on site.	In accordance with provincial legislation, cosmetic pesticide use is restricted and the landscape plan is designed to encourage limited maintenance. The purpose of the zoning amendment is to remove the existing automotive uses from the site in order to allow for residential uses.	EIS Section 10.2
14) That discrepancies between the EIS, FSR, and Hydrogeology report be revised in the updated EIS.	Discrepancies between the EIS, FSR, and Hydrogeology report have been corrected as identified.	EIS, FSR, and Hydrogeology reports
12) Clarify any proposed dewatering for the site and outline short and long-term impacts to Speed River levels, water quality and availability of fish habitat.	<p>Dewatering activities on the site may be required during construction based on the known water table adjacent to the Speed River. Sediment from dewatering can pose a threat to aquatic life and needs to be monitored for sediment volumes prior to release. As such, if significant groundwater is encountered it would be pumped into a settlement tank and discharged to the sanitary sewer until the time that the suspended solids and other water qualities are acceptable to be discharged into the storm sewer. The proposed final development is not anticipated to require a long-term water mitigation strategy.</p> <p>Relative to existing conditions, the proposed development introduces a reduced overall impervious area of clean runoff (rooftops) and an increased pervious area. The proposed development reduces site impervious from 94% under pre-development conditions to 75% post-development. As a result, the quality of runoff is anticipated to improve under post development conditions.</p>	EIS Sections 7.1.2, 7.2.1, 8.2,

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	<p>There is potential for direct impacts on fish and fish habitat in the vicinity of the proposed stormwater outlet to the Speed River. Since the stormwater outlet will be located above the normal water level of the Speed River, direct effects on fish and fish habitat are not expected to occur.</p> <p>Since the pumping zone of influence created by the construction dewatering is unlikely to intercept the Speed River, there is no preferred timing window for dewatering activities</p>	