

March 4, 2020

Mayor Maurizio Bevilaqua and Council
City of Vaughan
2141 major Mackenzie Drive
Vaughan, Ontario L6A 1T1

Via email

**Re: Minister's Zoning Order Support Request – Addendum Letter
Block 34 East, Vaughan, ON**

Savanta Inc. (Savanta) understands that the City of Vaughan has reviewed the Minister's Zoning Order (MZO) Support Request letter dated February 27, 2020 regarding applications from Conmar Developments Inc. and Fenlands Vaughan Inc. (Conmar/Fenlands), DG Group and Lorwood Holdings Inc. for a major distribution facility located on the Block 34 East lands.

This Addendum letter addresses the comments received from the City of Vaughan via email on March 3, 2020, which are related to natural heritage. Each comment is provided below in italics, with Savanta's response following the comment.

Comment #1: Environmental Planning staff note that a number of statements within the memorandum are not consistent with the Ministry of Natural Resources and Forestry's (MNRF) March 2016 correspondence regarding the ecological value of the wetland features located on the subject lands. For example, the first paragraph of page three notes "these wetlands are not providing significant contribution in the form or function to the overall PSW complex and are therefore not meeting the intent of the OWES Manual of providing important ecological benefit." However, this statement appears to directly contradict the written evaluation of the wetlands published by the MNRF in March of 2016. If the applicant is making claims that are different than the written correspondence from the MNRF (the ultimate authority when it comes to PSWs), it should be clear that these statements are the opinion of the applicant and do not necessarily reflect that of the MNRF, City or TRCA.

It is acknowledged that the MNRF continues to view the 3 small wetlands as PSWs. For the following reasons and as mentioned in the February 27, 2020 letter, Savanta is of the opinion that the wetlands do not meet the criteria outlined in the Ontario Wetland Evaluation System (OWES) Manual to be designated as PSWs. These views do not necessarily reflect those of the MNRF, City, or TRCA.

- The wetlands are small and isolated features;
- The wetlands have become degraded over recent years due to invasive species and pollution;
- A portion of wetland W181 (the most northwest PSW shown on the Figure) is currently drier compared to observations in 2014/2015, when MNRF assessed the wetlands. Savanta conducted vegetation plot surveys in 2019 and is of the opinion that the vegetation community no longer meets the definition of wetland under OWES.

- The wetlands provide weak ephemeral inputs (i.e., tiled drainage, ploughed through and cultivated fields, highway ditch) to downstream habitat, some of which is expected to be heavily polluted with road salt and refuse due to the Highway 400 ditch.
- Considering the above, Savanta is of the opinion that the wetlands are not providing a significant contribution in form or function to the overall PSW complex and are therefore not meeting the intent of the OWES Manual of providing important ecological benefit.

Comment #2: Environmental Planning staff note that in several instances, the memorandum identifies that the City and other agencies (i.e. TRCA, MNRF) agree with information and/or management approaches being provided by the applicant. We note that these statements may be mis-representing the views and opinions of City staff as well as the TRCA and MNRF. These sections should be removed and/or revised to clearly note that the information provided within the memorandum is the opinion of the applicant.

It is noted that the information provided within the February 27, 2020 letter is the opinion of the applicant and their consulting team. The proposed compensation plan has been developed with considerable input from the TRCA, MNRF, and MECP, however it is acknowledged that these agencies have not formally approved any compensation plans to date.

Comment #3: The attached Figure should be updated to clearly identify the three PSW features which form part of the complex versus the other identified wetlands that were not included as part of the complex. The three PSW features should be clearly identifiable.

The Figure (attached) has been revised to indicate those wetlands that have been identified by MNRF as PSW (Wetland Evaluated-Provincial MNRF LIO) and those wetlands that are not identified as PSW (Wetland Not Evaluated per OWES MNRF LIO).

Comment #4: We note that the memorandum should provide additional clarity as it relates to the proposed compensation strategy (page 3, paragraph 2). For example, it should be clear that the compensation taking place at the rear of the Conmar site (i.e. the 1.35 hectare Headwater Drainage Feature Compensation and Upland Enhancement Area) is to compensate for the removal of the HDF feature at the center of the property. Further, it should be noted that the wetland features to be removed will be relocated to the Block 34 E lands to the south, adjacent to the natural system. If they have not done so, the applicant may wish to have their environmental consultant (Savanta) review this portion of the memorandum to ensure accuracy of the information provided.

The Conmar/Fenlands lands will have an on-site Headwater Drainage Feature Compensation and Upland Enhancement Area that will compensate for the removal of the HDF that flows north-south through the centre of the Conmar/Fenlands property. This compensation area will include 0.51 ha of created wetland habitat along the west limit of the Conmar/Fenlands lands. Wetland features including the PSWs located on the Conmar/Fenlands property will be re-located to the Block 34 East lands to the south (DG Group/Lorwood lands), adjacent to the existing valley feature. Further, additional wetland habitat will be created adjacent to the valley feature to compensate for proposed wetland removal, including the PSW on the DG Group/Lorwood lands, totalling 1.82 ha of created wetland habitat. This will create a larger wetland area compared to the total of removed wetland habitat (1.42 ha).

These created wetlands will also provide compensation for the proposed removal of Redside Dace contributing habitat. Combined with SWM and LID measures designed by Schaeffers Consulting Engineers to provide clean and cool water to the created wetlands and downstream fish habitat, the consulting team is of the opinion that a net ecological gain will be achieved for both the functions of Redside Dace contributing habitat, as well as general wetland habitat, throughout the entire Block 34 East participating lands.

The proposed wetland creation and mitigation of Redside Dace contributing habitat is expected to achieve a net ecological gain through the following objectives:

- Establish an increase in wetland vegetation community types;
- Create online pools that provide appropriate amphibian breeding habitat;
- Provide additional wildlife enhancement features such as turtle basking logs, a bat roosting condominium, and wildlife habitat brush piles;
- Establish native shrubs and trees surrounding the watercourse to provide shading for thermal cooling of Redside Dace contributing habitat;
- Improve water quality of Redside Dace contributing habitat through the design of the created wetlands that will polish water;
- Replicate coarse sediment supply functions of Redside Dace contributing habitat through the design inclusion of alluvium deposits;
- Improve the wildlife linkage function between the C1 watercourse and the larger valley located approximately 70 m north of the Subject Lands (CRA Only); and
- Manage invasive plant species.

We trust this information is sufficient and satisfactory.

SAVANTA INC.
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