

August 20, 2015

Jason Wagler
Resource Planner
Grand River Conservation Authority
400 Clyde Rd,
Cambridge ON
N1R 5W6



**Re: Proposed Spencer Pit
Part of Lots 14-16, Lots 17 and 18, Concession B, Township of Guelph-Eramosa**

Dear Mr. Wagler,

Attached please find Stantec's response to the issues raised in your letter of July 9, 2015. For your convenience we have also included your letter dated July 9, 2015 and our previous response dated June 2, 2015.

We trust that the information provided adequately addresses your concerns. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

HARRINGTON McAVAN LTD.

A handwritten signature in black ink, appearing to read 'Glenn D. Harrington'.

Glenn D. Harrington, OALA, FCSLA
Principal

Enclosures - 3
GDH/sh

cc: B. Hermsen, MHBC



Stantec Consulting Ltd.
70 Southgate Drive, Suite 1, Guelph ON N1G 4P5

August 19, 2015
File: 160960833

Attention: Mr. Glenn Harrington
Harrington McAvan Ltd., Landscape Architects
6882 14th Avenue
Markham, Ontario L6B 1A8

Dear Glenn,

Reference: GRCA comments on Natural Environment Technical Report components of the Spencer Pit Zoning By-lay Amendment Application ZBA 01/14

Thank you for forwarding comments from the Grand River Conservation Authority (GRCA) dated July 9, 2015 with regards to the Zoning By-lay Amendment application for the Spencer Pit. This letter provides responses to the GRCA comments as they pertain to components in the Natural Environment Level 1 & 2 Technical Report (the Report) prepared by Stantec Consulting Ltd (Stantec). For ease of reference, our responses are numbered consistently with the comments provided in the GRCA letter.

Comment/response 1: We note that staff agrees with the labelling error with regards to the wetland evaluation mapping, and are pleased that GRCA will notify MNRF with regards to the error. We would also note, however, that the change in mapping will not affect our determination of no negative impact on the Speed River Wetland Complex, and that GRCA's notification of the mapping error to MNRF should not delay GRCA's review of the Report.

Comment/response 3: Noted, with thanks.

Comment/response 4: While Stantec agrees with GRCA's comment that "there is sufficient information within the Natural Environment Report to conclude that the onsite woodland within the proposed extraction area provides several ecological benefits", we continue to be of the opinion that these ecological benefits are not sufficient to designate the woodland as a significant woodland or as part of the County Greenlands system.

Prior to OPA 81, Section 5.5.4 (Woodlands) of the Wellington County OP provided criteria for significance as woodlands over 10 hectares (ha) in area. Woodlands in excess of 10 ha were included in the Greenlands system. With regard to ecological functions, Section 5.5 of the Natural Environment Report assesses the onsite woodland against each of the criteria for ecological functions for significant woodlands as defined in the Natural Heritage Reference Manual (MNR, 2010), and clearly indicates that no criterion for significance is met. We would request clarification of which ecological benefits GRCA considers to be provided by the woodlot that would merit it being designated as a Significant Woodland (keeping in mind our previous responses to GRCA's comments on potential ecological benefits in our July 30, 2014 letter).



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With respect to County OPA 81, which reduced the size threshold for significant woodlands in rural areas from 10 ha to 4 ha, it is our understanding that OPA 81 was not in force when the application that the Report addresses was submitted, and that OPA 81 does not apply to the application. Regardless of the applicability of the policies in OPA 81, we are of the opinion that removal of the woodlot (without rehabilitation to woodlands) to accommodate extraction of the aggregate beneath is supported in the current version of the Wellington County OP. We offer the following discussion to support this opinion.

Section 5.5.4 (Woodlands) of the 2015 Wellington County OP incorporates wording from OPA 81, and states that, *"In the Rural System, woodlands over 4 hectares and plantations over 10 hectares are considered to be significant by the County, and are included in the Greenlands system. Woodlands of this size are important due to their contribution to the amount of forest cover on the County landscape. Exceptions may include a plantation established and continuously managed for the sole purpose of complete removal at rotation without a reforestation objective, as demonstrated with documentation acceptable to the County"*. Section 5.6.1 (Permitted Uses) of the Wellington County OP states that aggregate extraction within Mineral Aggregate Areas is permitted in Core Greenlands areas and in Greenlands areas (with the exception of Provincially Significant Wetlands or significant habitat of threatened or endangered species). Permitted uses therefore include the development of aggregate extraction in significant woodlands subject to appropriate rezoning, licensing and the policies of the Plan.

The woodlot associated with the Spencer Pit is not identified as significant woodlands, nor is it included in the Greenlands or Core Greenlands mapping as presented in Schedule A3 (Guelph-Eramosa, updated March 9, 2015) of the Wellington County OP. The site is identified as Sand and Gravel Resources of Primary and Secondary Significance on Schedule C (Mineral Aggregate Resource Overlay, updated March 9, 2015) of the Wellington County OP. As development of the Spencer Pit will necessitate removal of most of the woodlot, this situation could represent one of the "exceptions" alluded to in Section 5.5.4, as the woodlot provides none of the ecological functions identified in the Natural Heritage Reference Manual, and the extraction area will be rehabilitated to agricultural lands after closure.

Based on this information, Stantec maintains the opinion that the onsite woodlot should not be considered significant, despite it meeting the minimum size criterion under OPA 81. As the woodland provides none of the ecological functions identified in the Natural Heritage Reference Manual, a demonstration of no negative impacts on the ecological functions of the woodland is not required, and therefore no reforestation objective is necessary under the Wellington County OP. This is consistent with the Core Greenlands mapping as presented in Schedules A3 and C of the Wellington County Official Plan.

Comment/response 5: Noted, with thanks.

Comment/response 6: It is not clear how the GRCA would propose to use the age and health of a single species (in this case hop-hornbeam) to determine the age of the forest communities in the proposed extraction zone. The information that Stantec used to describe the age and condition of the forest communities is provided on the ELC sheets (e.g., Size Class Analysis and/or



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Community Age). Hop-hornbeam is a slow growing, long lived tree highly adaptable tree that can thrive in open areas or in a forest understory. The presence of even very old specimens of hop-hornbeam does not convey useful information about woodland age, since the tree(s) may have started off in an open agricultural setting and may predate the surrounding woodland by many years.

Hop hornbeam was recorded in the woodlot during a late spring botanical survey on June 12, 2013, but was not listed on the ELC data sheets as it was not recorded during the ELC surveys on August 7, 2013.

Comment/response 7: Noted, with thanks.

I trust that these responses satisfy GRCA's comments with regards to natural heritage features associated with the Spencer Pit Zoning B-law Amendment. Please feel free to contact me should GRCA have any further questions or comments.

Regards,

STANTEC CONSULTING LTD.

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c. David Charlton, Stantec Consulting Ltd.

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