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BEL 219396

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via email: Dwelwood@regionofwaterloo.ca

**Re: Proposed Shantz Station Pit (Capital Paving), Township of Woolwich, Region of Waterloo
Response to Access Road Management/Ecological Enhancement Compensation Plan
(Revised March 2021)**

Dear Mr. Welwood:

Further to our Response Letter of January 20, 2021 and subsequent discussions with Capital Paving's consultant team during on February 8, 2021 regarding outstanding issues, we have now received and reviewed the Revised Access Road Management/Ecological Enhancement Compensation Plan (ARM/EECP) dated March 2021.

Our Response Letter of January 20, 2021 had concluded that the following outstanding concerns remained unaddressed:

- 1. The NER relies on the ARM/EECP to demonstrate that environmental impacts associated with this project can be mitigated and reversed, however we find the level of compensation/restoration plantings proposed in the ARM/EECP to be grossly insufficient to meet this policy test. We have provided preliminary suggestions on what these levels should be and are available to work with Riverstone to arrive at a solution;*
- 2. Design details for the proposed access road extension through the Wagner Woodlot do not appear to be available. These are necessary to finalize the Arborist Report and confirm the extent of impacts to trees; and*
- 3. We remain of the opinion that the introduction of jersey barriers along the access road through the Northern Wetland will impede the movements of small wildlife such as reptiles and amphibians and that ecopassages can help mitigate this impact. We are not convinced that ecopassages are not necessary nor feasible to integrate. There are designs that would be relatively easy to implement and do not require changing the driveway design. We recommend that they be further explored and implemented.*

Based on our review of the Revised ARM/EECP (March 2021) and supplementary information supplied by the consultant team, Beacon is now satisfied that these remaining concerns have been addressed as described below.

Issue 1 – Access Road Impacts and Adequacy of Proposed Compensation Measures

Our Response Letter of January 20, 2020 concluded that the supplemental information provided in the Updated Access Road Analysis Report (September 2020) adequately demonstrated that accessing the site via Forester Road was evaluated from an environmental, transportation, social and economic perspective and determined to be infeasible due to the substantial additional cost. As the applicable provincial and municipal policies related to constructing infrastructure in significant natural heritage features do not provide specific thresholds for evaluating feasibility, it was our opinion that the feasibility component of the policy test had been satisfied.

Our outstanding concern related to satisfying the impact component of the policy test which requires demonstrating that the potential impacts of the project are localized and reversible. We had expressed concern that the proposed level of compensation provided for in the November 2020 ARM/EECP was inadequate to offset the removal of 0.38 ha of significant woodland and recommended that the quantity of plantings be increased to achieve more typical reforestation densities.

In reviewing the March 2021 ARM/EECP and follow-up memorandum from MHBC dated March 23, 2021, we note that the tree planting densities have now been increased for both Zone 5 (New Access Road) and Zone 6 (Area adjacent to Wagner Woodlot). Specifically, Zone 5 will now be planted with 320 native trees and Zone 6 will be planted with 1,500 trees.

Beacon is now satisfied that the increased planting densities are now more consistent with typical reforestation approaches which satisfies our concern regarding the adequacy of the compensation and meeting the impact component of the policy test.

Issue 2. Access Road Design Details

In our Response Letter of January 20, 2021, we noted that the November 2020 version of the ARM/EECP had only included design details for the Existing Access Road (MTE Drawing Sheets PP1.1 – PP1.3) but not for the New Access Road. At our meeting of February 8, 2021, we were informed that the design drawings for the New Access Road were included in the Updated Access Road Analysis Report (September 2020). We have subsequently reviewed MTE Drawing Sheets PP1.4 and PP1.5 which correspond with the New Access Road and are now satisfied that the grading limits reflected in the Tree Inventory Report prepared by Riverstone (August 2020) is consistent with the MTE design drawings.

Issue 3. Ecopassages

In our Response Letter of January 20, 2021, we had also expressed concern regarding the potential for the proposed concrete barriers to impede wildlife movement across the Existing Access Road and suggested ecopassages to facilitate north-south wildlife movements.

We have been advised that this issue was discussed in the field with Ministry of Natural Resources and Forestry (MNRF) ecology staff on September 29, 2020 and that it was agreed that ecopassages would not be viable in this location for technical reasons and that it would be preferable to focus efforts on enhancing the east-west wildlife movements between Hopewell Creek Wetland and Breslau Swamp Wetland. This position was confirmed through a review of email correspondence between G. Buck - MNRF Planning Ecologist and MHBC on October 20, 2020). Given MNRF's role in providing technical

expertise related to significant wildlife habitat, Beacon will defer to their position in this case and has no further comment on this matter.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours Truly,

Beacon Environmental



Ken Ursic, B.Sc., M.Sc.
Principal