



Environmental Assessments & Approvals

November 28, 2019

AEC 11-237

Town of Orangeville File No's.: OPZ 5/10 and S 1/10
CVC File No. T 10/001 & OZ 10/005

Orangeville Highlands Limited c/o
Ventawood Management Inc.
2458 Dundas Street W
Mississauga ON
L5K 1R8

Attention: Carmen Jandu, MCIP RPP

Re: **Response to Agency 3rd Submission Review Comments related to the
Environmental Impact Study and Management Plan – Orangeville Highlands
Phase 2
East Half of Lot 3, Concession 2, Town of Orangeville, County of Dufferin**

Dear Ms. Jandu:

The purpose of this letter is to provide a response to comments circulated by the Town of Orangeville dated October 28, 2019. This response addresses comments from the Town of Orangeville, and Credit Valley Conservation (CVC) related to Ecology (*i.e.* Environmental Impact Study [EIS] and Management Plan [MP] – Orangeville Highlands Phase 2) matters associated with the proposed development for the abovementioned property. For your convenience, the original comments are provided in italics and Azimuth's response is provided below.

Town of Orangeville (October 28, 2019)

Section 7.4 Planning Division

Comment No. 3

In addition, the "Addendum to Environmental Impact study and Management Plan" (Azimuth Environmental Consulting Inc., April 15, 2019) states that the mitigation for the loss of

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woodland will occur through compensation planting in the Park Block 25, noting that the Town is amendable to this compensation occurring within the Park Block.

It is unclear on the Facility Fit Plan as to where this compensation planting is to be situated. CVC comments contained herein have identified no concerns with this, provided that the Town accepts this approach. Planning Division staff have no concerns with the compensation approach occurring within the Park Block, provided that the facilities requested by the Parks and Facilities Division can be accommodated and an adequate planting buffer care can be provided along the western block boundary adjacent to the existing residential dwellings. Confirmation from the Parks and Facilities Division is required for the proposed planting/compensation approach for the Park Block 25.

Azimuth Response: The location of the proposed Compensation Planting Area is depicted on Figure 3 of the EIS (appended). Through correspondence with CVC, it has been confirmed that compensation for the woodland removed will be provided at a 1:1 ratio, therefore, the total area of proposed woodland Compensation Planting Area will be 0.11ha or greater in size. The Facility Fit Plan has been updated to indicate where the Compensation Planting Area is proposed.

Comment No. 10

The “Addendum to Environmental Impact Study and Management Plan” (Azimuth Environmental Consulting Inc., April 15, 2019) provides an analysis of the Natural Environment policies of Section E5 and specifically the Environmental Impact Study policies of Section E5.3.15 and E5.3.16 of the Town’s Official Plan. Confirmation that the Environmental Impact Study and Management Plan is satisfactory (i.e., has addressed the foregoing policies of the Town’s Official Plan), will be determined upon receipt of satisfactory comments from Credit Valley Conservation.

Azimuth Response: Comment noted.

Credit Valley Conservation (June 21, 2019)

Planning/General

Comment No. 4

The proposed wetland appears to be located partially within the calculated stable top of slope/meander belt. Is there a specific/functional reason why the wetland was placed in this location? Would it be possible to shift the proposed wetland further west where there is more space outside of the calculated stable top of slope/meander belt?

Azimuth Response: The drawing depicting the location of the proposed wetland compensation area is conceptual. We have updated Figure 3 to move the proposed wetland away from the Stable Top of Slope/meanderbelt and have shifted it slightly to the west. The location of the proposed wetland was intended to provide supporting habitat to created amphibian breeding habitat associated with Drainage Feature B.



Ecology

Significant Woodland Comment No. 1

The proposed mitigation measure of planting trees and shrubs within Block 25 is acceptable. However, the location of the plantings as currently proposed does not mitigate for the loss of the portion of the significant woodland. The plantings should be re-located to the northern area of the Park Block Block 25) to be adjacent to the buffer to the significant woodland to help contribute to the form and function of the natural heritage system. Please follow up with the Town to confirm this is acceptable within their Park Block 25.

Azimuth Response:

From an ecological perspective, the woodland that was removed (Removed Woodland, Figure 3) was:

- 0.11ha in size;
- A ‘finger’ of woodland with a maximum length of approximately 47m and width ranging from 17m – 23m;
- Likely provided edge habitat for local urban wildlife;
- Composed of primarily Eastern White Cedar; and
- Did not provide nor contribute to interior forest conditions.

The proposed woodland Compensation Planting Area (Figure 3) is:

- 0.11ha (or greater) in size;
- A ‘finger’ of woodland with a maximum length of approximately 141m and a width of 9m;
- Will provide edge habitat for local urban wildlife;
- Opportunity to increase species diversity; and
- Does not provide nor contribute to interior forest conditions.

The proposed woodland Compensation Planting Area (Figure 3) will replace the tree cover that was lost through the removal of a portion of the woodland and, once mature, will function in a manner similar to the ‘removed woodland’.

As per Town comments, ‘Planning Division staff have no concerns with the compensation approach occurring within the Park Block, provided that the facilities requested by the Parks and Facilities Division can be accommodated and an adequate planting buffer care can be provided along the western block boundary adjacent to the existing residential dwellings.’. Based on Town comments, it is our understanding that compensation plantings are preferred along the western block boundary.

Therefore; it is our opinion that the proposed ‘finger’ woodland Compensation Planting Area will function in a similar manner to the previous woodland and has the potential to provide greater species diversity. Furthermore, its location along the western boundary of the Park Block is preferred by the Town.



Drainage Features & Wetland Creation

Comment No. 2

Drainage Feature A: The removal of portions of this drainage feature to be mitigated for with a wetland creation is acceptable. Further, provided that confidence of wetland hydrology can be achieved in the proposed wetland feature (see Comment 4 for more information), we would be satisfied with further details being provided at detailed design.

Azimuth Response: Comment noted. Details will be provided at detailed design.

Comment No. 3

Drainage Feature B: Identify opportunities to minimize impacts to, and replicate the function of, the existing drainage feature within the proposed design of the SWM pond outfall. Please provide the design in a manner that maintains the existing functions (e.g. wetland habitat, amphibian breeding habitat, water storage) of the existing drainage feature. It is suggested that an enhanced outfall be designed to include elements of natural channel design and wetland pockets that would provide both natural heritage and water retention/storage functions. Grading should be minimized to the extent feasible, and as much of the existing feature should be maintained as possible, especially towards the downstream end at the connection to the creek.

Azimuth Response: The proposed channel grading has been adjusted to address CVC comment #3. The proposed channel top of bank setback has been reduced from 10.0m to 6.0m in order to accommodate for additional floor space (*i.e.* water storage capacity) and a meandering channel outlet as the extension of the pond outfall pipe. The channel floodplain will continue to provide wetland conditions and two amphibian breeding ponds are proposed at the northern end of the channel in order to provide suitable amphibian breeding habitat. It is the intention that the ponds will provide suitable habitat for egg-laying and development, shelter from heat/predators through the incorporation of native plantings, suitable foraging areas and potentially suitable hibernation sites (at least 1.5m deep at some locations).

Comment No. 4

Wetland Creation: Based on the response provided, it's our understanding that hydrology of the created wetland will be achieved by a combination of both high seasonal groundwater and surface water inputs, and that these inputs would be sufficient to maintain hydric soils/wetland vegetation. Please confirm whether this is correct and confirm that the feature would not intersect with the permanent groundwater table.

Azimuth Response: Yes, CVC is correct. The elevation and high ground water level at this location will be confirmed at detailed design to ensure conditions are appropriate to sustain wetland conditions. This aligns with CVC comment No. 2 above.

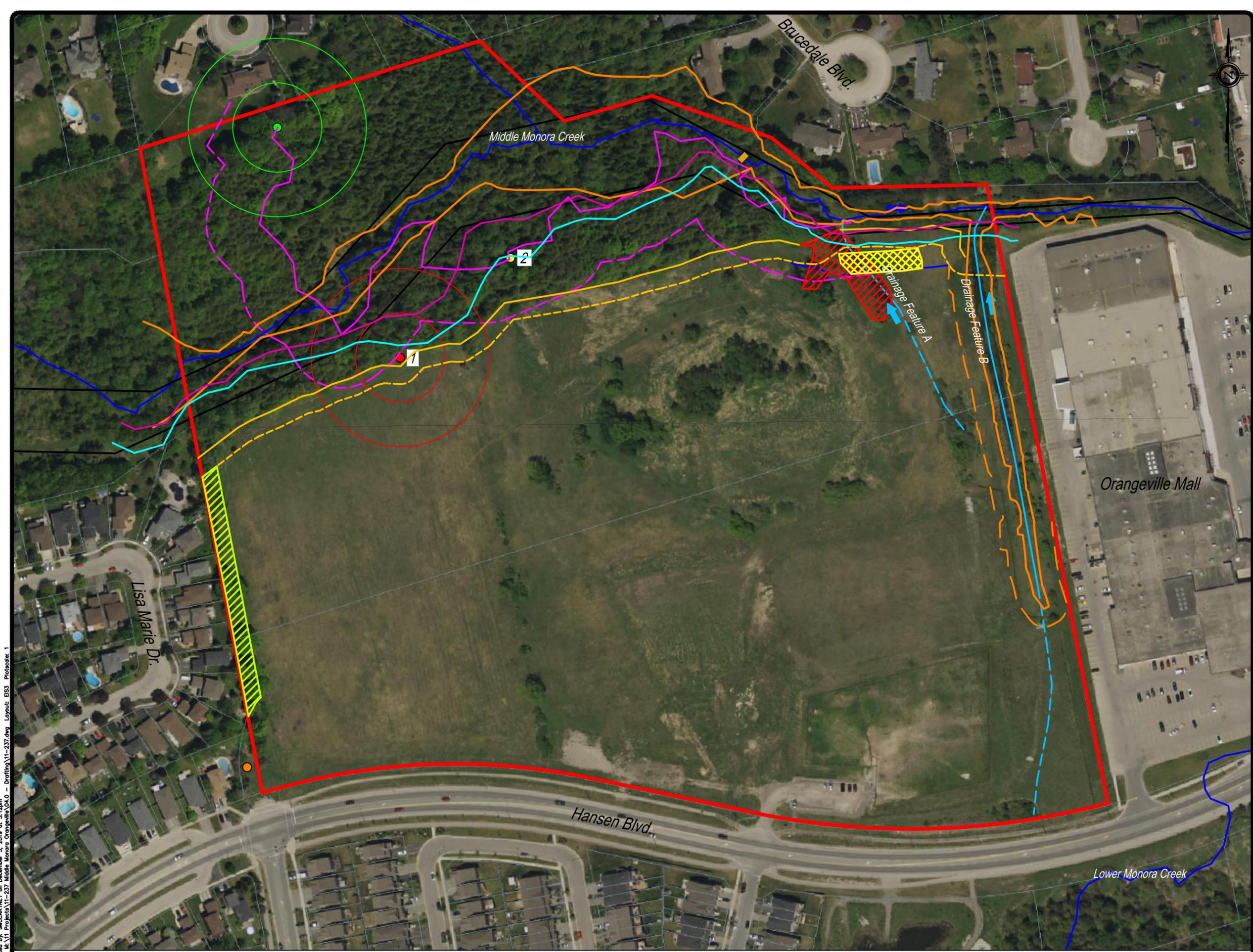


We trust the information provided above will satisfy your concerns regarding Azimuth's EIS & MP related to the proposed Orangeville Highlands Phase 2. Should you require further information or have any questions, please contact the undersigned.

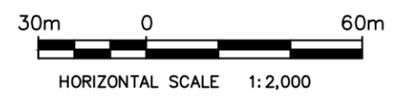
Yours truly,
AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Lisa Moran, B.Sc.Env.
Terrestrial Ecologist

Attach: Azimuth Figure 3: Environmental Constraints (November 2019)



- LEGEND:**
- Approx. Property Boundary
 - Watercourse (Monora Creek)
 - - - 30m Watercourse Buffer
 - Permanent Drainage Feature
 - - - Intermittent Drainage Feature
 - ➔ Flow Direction
 - Orangeville Provincially Significant Wetland
 - - - 30m Wetland Buffer
 - 2011 Dripline
 - - - 10m Dripline Buffer
 - ▨ Removed Woodland (0.11ha)
 - ▨ Compensation Planting Area (0.11ha)
 - ▨ Proposed Wetland Compensation (0.05ha)
 - Flood Line (Water's Edge, 2019)
 - - - 10m Floodline Buffer
 - Calculated Stable Top of Slope
 - Meanderbelt
 - Significant Valleyland (Meander Belt Width, Water's Edge 2013)
 - ▬ Culvert
 - Category 1 Butternut Location (2018 Assessment)
 - Category 2 Butternut Location with 25m and 50m Buffers (2018 Assessment)
 - Butternut Location (Not Assessed) with 25m and 50m Buffers
 - Hybrid Butternut Location



Environmental Constraints

Orangeville Highlands Phase 2
Orangeville, ON

DATE ISSUED:	March 2019	Figure No.
CREATED BY:	JLM	3
PROJECT NO.:	11-237	
REFERENCE:	First Base Solutions	

Plotted by: MCCARTNEY on December 3, 2019 at 3:12pm
 File: M:\11 Projects\11-237 Middle Monora Orangeville\04.0 - Drafting\11-237.dwg Layout: EIS3 PlotScale: 1