



August 19, 2020

Project No. 2118

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Dear Mr. Brum, Ms. Gurney, and Ms. Padgett,

**RE: Cambridge IP Park Phase 2
Response to Submission 2 Agency Comments**

Detailed comments were received from the Grand River Conservation Authority (GRCA), the Region of Waterloo, and the City of Cambridge on submission 2 of the Cambridge IP Park Phase 2 Environmental Impact Study (EIS), dated February 13, 2020. The EIS was submitted in support of the proposed Draft Plan of Subdivision application (File No. 30T-18102) for the lands located at the corner of Riverbank Drive and Allendale Road in Cambridge, Ontario.

A letter responding to the majority of the above-noted agency comments on natural heritage was submitted on June 5, 2020. The letter addressed the comments that were specific to the design and location of the SWM pond, and comments relating to the Upper Freeport Creek Provincially Significant Wetland (PSW) boundary and setbacks. This letter is referred below as the Stormwater Management (SWM) Pond Response Letter.

This current letter addresses all remaining natural heritage comments received from the GRCA, Region, and City.

Grand River Conservation Authority – Natural Heritage Comments

Letter dated March 26, 2020 from John Brum (Resource Planner, GRCA) to Sylvia Rafalski-Misch (Planning, Housing and Community Services, Regional Municipality of Waterloo)

Comment 14: With respect to mitigation measures outlined in Section 8.2, we request that machinery maintenance and fueling occur no closer than 30 m from any wetland or watercourse.

NRSI Response: Acknowledged and agreed. Section 8.2 of the Submission 2 EIS (February 13, 2020) states:

“Machinery maintenance and fueling is to occur at designated locations away from the PSW and Freeport Creek; machinery fueling will not occur within 15m of a watercourse, regardless of development limits.”

The following text replaces this statement:

“Machinery maintenance and fueling is to occur at designated locations a minimum of 30m from the PSW and Freeport Creek, regardless of development limits.”

Comment 19: A detailed erosion and sediment control plan is required.

NRSI Response: Section 8.2 of the Submission 2 EIS (February 13, 2020) recommends that a detailed Erosion and Sediment Control Plan (ESCP) be developed prior to construction activities, and provides high-level recommendations for the development of this plan. The ESCP will be prepared by the project team and submitted at the detailed design stage.

Comment 21: A pre, during, and post construction monitoring plan is recommended in order to assess the effectiveness of proposed mitigation measures and to implement contingencies as needed.

NRSI Response: Section 8.3 of the Submission 2 EIS (February 13, 2020) provides high-level recommendations for the pre-, during- and post-construction monitoring plan. Monitoring of the PSW buffer to the south of the development is anticipated to be completed by others, since all development in this area is associated with the construction of Intermarket Road (which has been transferred to the City) and the SWM Pond (which is to be transferred via Draft Plan of Subdivision). A monitoring program for the Significant Woodland adjacent to the development is recommended, and can be prepared at the detailed design stage.

GRCA comments 1 to 10, 15, and 16 are specific to resource planning and engineering designs or drawings; these comments have been addressed under separate cover by the project team at EXP. **GRCA comments 11, 12, 13, 17, 18, 20** relate to development setbacks, the PSW boundary, water balance impact analyses, and landscaping and enhancement plans for the SWM block and PSW buffer were addressed by NRSI under separate cover in the SWM Pond Response Letter (June 5, 2020).

Regional Municipality of Waterloo Comments

Email dated March 31, 2020 from Jane Gurney (Principal Planner, Community Planning, Regional Municipality of Waterloo) to Peter Markine (Intermarket Properties)

Comment 1: There is a candidate Environmentally Sensitive Policy Area (ESPA) within the limits of the subject lands, identified as Candidate ESPA 2 in the Freeport Creek and Tributary to the Grand Subwatershed Study (November, 2013) completed through the Master Environmental Servicing Plan (MESP) for the East Side Lands – Stage 1. Although the ESPA is not yet mapped in the Regional Official Plan (ROP), it should be reviewed and refined through local Environmental Impact Statements (EIS). The revised EIS (Section 5.2.4, Cambridge IP Business Park Phase 2: Business Park, NRSI, February 2020) states that the ESPA is not incorporated into the ROP at this time, but does not further address the recommendations of the MESP (East Side Lands, Stage 1) to identify and evaluate the elements of the Greenlands Network and interpret the boundaries of the environmental features through local assessments, as identified in Section 9.1 of the Freeport Creek and Tributary to the Grand Subwatershed Study.

NRSI Response: Section 5.2.4 of the Submission 2 EIS (February 13, 2020), provides a brief summary of Candidate ESPA 2, while other sections and mapping throughout the EIS refine and interpret the boundaries of the ESPA and evaluate the elements of the Greenlands Network. A brief summary is provided in the following paragraphs.

The Upper Freeport Creek PSW and Significant Woodland form the majority of a contiguous block of naturalized land containing a variety of upland and wetland habitats that was determined to meet the criteria for designation as an ESPA in the Subwatershed Study (Aquafor Beech Ltd. 2013). In the Submission 2 EIS, the PSW is characterized in sections 5.2.2 and 5.3.2, and its ecological functions and significance are discussed in Sections 6.1, 6.4, and 6.5. The Significant Woodland is characterized in sections 5.2.1, and its ecological functions and significance are discussed in Sections 6.3, 6.4, and 6.5.

Section 5.3.5 provides a detailed Greenlands Network Vegetation Analysis that summarizes changes to the elements of the Greenlands Network that occurred within the subject property between its identification in the 2013 Subwatershed Study and the natural heritage studies conducted to inform the 2020 EIS.

Map 1 (Revised Draft Plan of Subdivision) of the SWM Pond Response Letter (June 5, 2020) shows the PSW boundaries delineated in 2018 and 2020 and their 30m buffers. Post-development, south of the proposed subdivision the boundary of Candidate ESPA 2 is recommended to extend to the edge of the 2020 PSW 30m buffer. The 2020 PSW boundary was approved by the GRCA on July 14, 2020 via email correspondence from John Brum (GRCA) to Mark Kindrachuk (Intermarket Properties).

Map 2 of the Submission 2 EIS (February 13, 2020) and the revised grading plans and Draft Plan of Subdivision submitted by EXP as part of this current submission show the dripline of the Significant Woodland and its 15m buffer. Post-development, the edge of the 15m buffer is recommended to be the new boundary of Candidate ESPA 2 along the remainder of the southern subject property boundary.

Comment 3: The proposed grading and development is dependent on off-site tree removals and access, yet permissions have not been obtained as yet. Given the grading is dependent on

the support and permission from the adjacent landowner, it is recommended that this be provided at this time, otherwise, modifications to the plans will be required.

NRSI Response: As part of the revised Draft Plan, the retaining wall and grading along the western property boundary have been shifted east to ensure that all off-property trees can be retained. A scoped Arborist Brief has been prepared to summarize and map the changes to the tree retention analysis for the Cambridge IP Phase 2 development based on these modifications (Appendix I). It is not anticipated that any offsite trees will be impacted, and landowner agreements will therefore not be required.

Comment 4: In Section 7.5.6 of the EIS it states that the hours of construction will be restricted to between 7:00AM-7:00PM, which will minimize impacts to adjacent wildlife in the environmental features. It is requested that the City confirm if there are general restrictions regarding hours of operation for construction sites or if site-specific restrictions will be in place for the subject site in order to ensure that the recommended mitigation identified in the EIS is implemented.

NRSI Response: The City of Cambridge has a noise bylaw that prohibits and regulates noise between 8:00pm and 7:00am. Email correspondence from Kathy Padgett (City) to Desta Frey (NRSI) on July 14, 2020 confirmed that working hours are between 7am and 8pm. Therefore, recommended mitigation identified in the EIS would be generally be regulated through the City's noise bylaw enforcement.

Regional Comment 2 relates to natural feature buffer widths and was addressed by NRSI under separate cover in the SWM Pond Response Letter (June 5, 2020).

City of Cambridge Comments

Second Submission – Environmental Comments dated March 25, 2020 from Kathy Padgett, Senior Planner – Environment

Comment 1B: Significant Woodland – I recognize the addition of Block 8 Open Space on the Draft Plan of Subdivision to capture the 15m setback from the Significant Woodland dripline as requested in my previous comments.

NRSI Response: Acknowledged.

Comment 2B: Block 8 Open Space – As indicated in an email from myself to Peter Markine dated December 3, 2019, private SWM facilities or services will not be permitted on City owned lands and as such, no SWM facilities or services should be located in Block 8. I also noted that minor grading into the buffer to accommodate SWM adjacent to the buffer may be acceptable. The EIS notes that grading is proposed in the outer half of the 15m woodland buffer, but then also notes that the minimum distance between the woodland dripline and the limit of grading as 4.2m, well beyond the outer half of the limit. From my review of the EIS and the SWM Report, I would not consider the proposed grading in the buffer to be minor in nature.

NRSI Response: Grading in the Significant Woodland buffer has been revised. The limit of grading now remains in the outer half of the normalized 15m woodland buffer.

Comment 3: Offsite Tree Removals and Grading – For any proposed offsite tree removals and grading, a letter from the affected landowner agreeing to the proposed works is required as a condition of draft plan approval.

NRSI Response: Acknowledged. Please see NRSI Response to Regional Comment 3 above, as well as the scoped Arborist Brief provided in Appendix I.

City Comments 1A and 2A relate to development setbacks and were addressed by NRSI under separate cover in the SWM Pond Response Letter (June 5, 2020).

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

Sincerely,
Natural Resource Solutions Inc.



Desta Frey
Project Manager

Appendix I
Arborist Brief