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Project No. 2384

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**RE: iPort Cambridge
Response to Submission 3 Agency Comments**

Natural Resource Solutions Inc. (NRSI) has reviewed comments received from the Grand River Conservation Authority (GRCA), City of Cambridge, and Region of Waterloo on Submission 3 of the iPort Cambridge Draft Plan of Industrial Subdivision, proposed for the lands at 250 Allendale Road and 105 Middle Block Road in Cambridge, Ontario (File No. 30T-20102). Comments on Submission 3 were received from the GRCA, City, and Region on April 20, May 14, and May 21, 2021, respectively. This letter responds to these agency comments and addresses the changes to the Draft Plan of Subdivision that have been made by the project team in preparation for the 4th submission.

To inform this letter, NRSI biologists reviewed the revised grading and servicing plans prepared by EXP and provided for NRSI review on July 9, 2021.

Grand River Conservation Authority Comments

Letter dated April 20, 2021 from John Brum (Resource Planner, GRCA) to Sylvia Rafalski-Misch (Planning, Housing and Community Services, Regional Municipality of Waterloo)

Comments received from the GRCA were specific to Water Resources Engineering and are being addressed under separate cover by the project teams at EXP and Water's Edge. No additional natural heritage issues were identified.

City of Cambridge Comments

Third Submission – Environmental Planning Comments dated May 14, 2021 from Kathy Padgett, Senior Planner – Environment

Comments received from the City of Cambridge indicated that all previous comments were addressed through the 3rd submission. Clarification regarding the proposed natural feature

buffer in the southeastern corner of the Maple Grove Road Provincially Significant Wetland (PSW) was requested as follows:

“It is acknowledged that the Draft Plan of Subdivision (dated February 19, 2021) has been revised so that the lot line at the extreme southeastern corner of the PSW now encompasses a full 30m setback. It is assumed that the Natural Feature Buffer Enhancement Plan will apply to this area. Should the area also be identified on the Draft Plan of Subdivision as a “Recommended Wetland Setback (NRSI)”?”

The Natural Feature Buffer Enhancement Plan (that is anticipated to be developed as a condition of Draft Plan Approval) will indeed extend to the edge of the lot line in this southeastern area of the PSW. The wetland setback for the overall PSW is now labelled on the Draft Plan of Subdivision as the “Recommended Wetland Setback (By NRSI)” and ranges between 15m and 94m as by the EIS and its Addendums (NRSI 2020a, 2020b, 2021).

Regional Municipality of Waterloo Comments

Letter dated May 21, 2021 from Sylvia Rafalski-Misch (Planning, Housing and Community Services, Regional Municipality of Waterloo) to Kathy Padgett (Senior Planner – Environment, City of Cambridge)

Detailed comments were provided by Environmental Planning staff addressing the matter of buffer width around the Core Feature – Significant Woodland that forms the southern portion of the Environmentally Sensitive Policy Area (ESPA) on the subject property. For a number of reasons that were thoroughly outlined in the above-noted comments letter, the Region is unable to support a 10m buffer from the woodlot portion of the ESPA and has required that a 30m be applied instead.

The updated Draft Plan of Subdivision has been revised to incorporate this 30m buffer.

Revisions to the Proposed Undertaking

In addition to expanding the Significant Woodland buffer width from 10m to 30m, grading within the woodland buffer area has also been revised. Under the revised plan, all grading has been shifted to the outer half of the 30m buffer. Minor grading in the outer 15m of the buffer is proposed in order to accommodate a smooth, gently-sloping transition from the proposed development while meeting the existing grade. In the post-development scenario, the entire 30m buffer will be naturalized through the implementation of the Natural Feature Buffer Enhancement Plan. The proposed grading in the outer portion of the buffer is not anticipated to reduce the ability of the buffer to effectively protect the integrity and functions of the existing feature.

Similarly, the trail proposed along the western edge of the Significant Woodland has also been shifted to the outer portion of the 30m buffer. In combination with the mitigation measures recommended in Section 2.2 of the EIS Addendum (NRSI 2020b), increasing the distance between the trail and the existing woodland feature will help to further minimize the creation of impacts to natural features that can result from trail use by the general public (creation of unauthorized trails, vegetation trampling, etc.).

As shown on the site servicing plans provided as part of both Submissions 2 and 3, a 1050mm-diameter storm sewer is proposed to convey stormwater runoff from Block 1 to the proposed vegetated drainage swales within the east-west wildlife corridor/SWM/pedestrian connection. The sewer will be installed in the centre of the existing gap between the Significant Woodland

and PSW portions of the ESPA, through an area that is currently comprised of manicured sod. Installing the storm sewer in this location (i.e., in the outer half of the 30m woodlot buffer) is not anticipated to result in any negative ecological impacts or reduce the ability of the buffers to function as intended.

Post-development, the gap between these natural features will be restored and enhanced with plantings of native trees, shrubs, and herbaceous species to create a variety of habitat types. It is anticipated that the Natural Feature Buffer Enhancement Plan will incorporate meadow, thicket, and forest areas and provide for a mosaic of habitat types and functions.

To ensure that the sewer can remain accessible for repair or replacement in the long-term, lands on top of, and adjacent to, the pipe will be restored as a meadow. An 'access corridor' for the sewer of an appropriate width will be identified on the Natural Feature Buffer Enhancement Plan and designated for plantings of herbaceous species only. The EIS Addendum No. 2 (NRSI 2021) outlined a recommended maintenance regime for the 100-year flood elevation area within the wildlife movement corridor. The maintenance regime was provided to ensure that large, woody species do not establish in the drainage swales (which are also intended to be planted as meadow habitats) and thereby affect the flood storage capacity of the floodplain. It is recommended that the same maintenance regime be undertaken within the 'access corridor' for the storm sewer, so that future repair or replacement of the sewer remains uninhibited by the presence of large woody species.

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

References

- Natural Resource Solutions Inc. (NRSI). 2020a. iPort Cambridge Environmental Impact Study. Prepared for Healthcare of Ontario Pension Plan c/o Trioinvest. March 31, 2020
- Natural Resource Solutions Inc. (NRSI). 2020b. iPort Cambridge Environmental Impact Study Addendum. Prepared for Healthcare of Ontario Pension Plan c/o Trioinvest. October 29, 2020
- Natural Resource Solutions Inc. (NRSI). 2021. iPort Cambridge Environmental Impact Study Addendum No. 2. Prepared for Healthcare of Ontario Pension Plan c/o Trioinvest. March 16, 2021