



April 28th 2020

Vincent Denomme
Claridge Homes
210 Gladstone Avenue
Ottawa, ON K2P 0Y6

Dear Vincent:

RE: Spring Valley Trails Phase 5 & 6 (3252 Navan Road) EIS – Response to Comments

We have reviewed the agency documents and responses to the Environmental Impact Statement (EIS) and Tree Conservation Report (TCR) WSP prepared for the Spring Valley Trails Phase 5 & 6 development at 3252 Navan Road.

As we are continuing to evaluate the natural heritage features and assess the anticipated impacts during this current field season, we will be providing an updated EIS and TCR which will address several of the comments received. We are expecting to have this updated EIS and TCR completed in July following completing of the required field surveys.

The updated EIS and TCR will also incorporate a review of findings from the adjacent Spring Valley Trails Phase 3 development EIS and Species at Risk (SAR) reports; which includes the property parcel representing Phase 5 of the Spring Valley Trails development. Where required, WSP will also confirm and update the findings from these results for Phase 5 of the development.

We believe that the attached responses will address concerns and questions pertaining to the preliminary EIS and TCR. Please feel free to contact us if you require any additional information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alex Zeller'.

Alex Zeller
Senior Ecologist

WSP ref.: 191-15659-00

Agency/Reviewer	Comment	Response
City of Ottawa	The study area and subject property identified in the EIS is different from the subject site identified in the planning rationale and project summary. At the very least, the EIS must examine the entire property that is included in the zoning application. In fact, the EIS guidelines require examination of the broader ecosystem and landscape than just investigating within the subject property's boundaries. Given the subject property's proximity to Mer Bleue, a significant wetland complex in Ottawa's east side, a broader examination will be warranted.	An updated EIS/TCR will be completed in the summer of 2020 which will include a full examination of the subject property and surrounding lands as required (including lands adjacent Mer Bleue. The updated EIS and TCR will included relevant Species at Risk (SAR) and TCR information previously outlined in the 2017 and 2018 reports prepared by McKinley Environmental Solutions for the adjacent Phase 3 development, which evaluates the Phase 5 lands. WSP's field surveys in 2020 will include a re-assessment of ELC communities and vegetation, a re-evaluation of candidate SAR habitat, and other incidental observation.
	The EIS conducted its site visit in December 2019, which is outside of the growing season as stated in the EIS guidelines. While the EIS has suggested that further field studies will be required, the December field studies and lack of SAR investigations offer insufficient data and results.	Project timelines limited the opportunity to complete all required field surveys. The remaining required field surveys are currently underway and will be completed in summer of 2020. The updated EIS and TCR will include the findings from these surveys and re-evaluation of impacts and mitigation measures.
	It would be imprudent to proceed with the proposed development review without having the fundamental information from a complete EIS to inform design. Doing so counters "design with nature" principles and the City's Official Plan policies. I recommend only circulating the ZBA when the EIS field investigations are satisfactorily completed and offer sufficient information to identify existing conditions and environmental constraints, analyze potential impacts, inform design and recommend appropriate mitigation measures.	Noted. It is our intent to inform our client of our findings and develop mitigation measures and strategies to incorporate into the design of the proposed development.
Rideau Valley Conservation Authority	Until the findings of the Headwater Drainage Features Assessment (HDFA) are known and accepted, it cannot be assumed that the existing watercourse can be altered/eliminated to facilitate development. The requirements for development setbacks, etc. has the potential to alter the proposed zoning boundaries should the HDFA not support the alteration/filling in of the watercourse.	Noted. As of April 28 th , WSP has completed the first HDFA site visit. With the results of this initial visit we are prepared to consult with the RVCA to discuss preliminary findings of this survey and options for the management of these features.
	The prior written approval of the RVCA is required for any alteration, straightening, changing, diverting or interfering in any way with any watercourse.	Noted.
	In conclusion, the RVCA recommends this application be placed ON HOLD until such time that the constraints have been appropriately identified and the appropriate zoning boundaries and designations have been identified. Please keep us informed on the status of this application.	Noted.
Waste Connections Canada	It should be noted the investigation on which the Environmental Impact Statement is based was a very short period during the winter months (One visit on December 17, 2019). Species at risk (SAR) habitat such as the Bank Sparrow which is a seasonal bird, or others such as reptiles, amphibian and aquatic species can only be observed during frost free periods of the year.	WSP will be continuing with field surveys to evaluate SAR habitat and SAR presence during spring and summer 2020. The updated EIS/TCR will include the results from these surveys, a revised evaluation of potential impacts, and an updated suite of mitigation and management recommendations.
	Given the importance of protecting SAR and endangered species, the presence of two separate wetland communities identified in the “Study Area” and the proximity of the proposed development to the Mer Bleue Bog (an Area of Natural and Scientific Interest (ANSI) managed by the National Capital Commission), the Zoning By-law Amendment and Plan of Subdivision application could be viewed as incomplete and pre-mature. This is supported by WSP's conclusion in Section 9 of the report that the study was incomplete and inadequate to effectively evaluate environmental impacts to natural heritage features. Although the report conclusions contradicts this statement by WSP by stating the proposed residential development is unlikely to negatively impact the natural heritage system, SAR, or local wildlife.	As noted above, WSP will be issuing an updated EIS/TCR which will evaluate natural heritage features and SAR habitat that could not be surveyed during the initial winter site visit.
	Claridge completed the habitat relocation project onto WCC property located along the west property line above the escarpment during the Spring Valley Trails Phase 2 development. Bank Swallow nesting has since been observed at this location. Although the relocated habitat is not on the proposed Spring Valley Trails – Phase 5/6 development land, it is immediately adjacent to the habitat that may be negatively impacted due to harassment. It is also located within the proposed alignment of the Joshua Street extension.	Noted. WSP will incorporate this information into our field program and additional EIS/TCR.