

July 2, 2025

AEC 24-153

Charis Developments Ltd.
186 Hurontario Street, Suite 204
Collingwood, Ontario L9Y 4T4

Attention: David Finbow

Re: **Environment Impact Study Addendum #1 for a Proposed Development on Part of Lot 40,
Concession 8 (The Gateway Centre), Town of Collingwood**

David Finbow:

Azimuth Environmental Consulting, Inc. (Azimuth) was retained by Charis Developments Ltd. to prepare an Environmental Impact Study (EIS) for a proposed development at Part of Lot 40, Concession 8 (also referred to as The Gateway Centre lands) within the Town of Collingwood (the "Town"), County of Simcoe (the "County"). The initial EIS submission is dated September 9, 2024, and provided a detailed review of natural heritage features within the study area related to the proposed development, and recommendations for mitigation and additional considerations such that negative impacts to Key Natural Heritage Features (KNHFs) and functions are avoided. The EIS concluded that with regard to Wetland #2 (see updated Figure 2 (Environmental Features), attached) further investigation was recommended to determine if the wetland is sustained by a ground water source and therefore subject to regulation under *Ontario Regulation (O. Reg.) 41/24* by the Nottawasaga Valley Conservation Authority (NVCA), to be documented within a future EIS Addendum.

The initial EIS submission received natural heritage peer review comments prepared by Natural Resource Solutions Inc. (NRSI) on behalf of the Town, in a letter and appended comment/response matrix dated December 6, 2024. NRSI comments were largely related to concerns regarding potential for bat roosting habitat on the property. Matters related to permissions and approvals associated with proposed removals within Wetland #2 were deferred to the NVCA.

The initial EIS submission also received NVCA review through a letter issued March 7, 2025, attached for reference. Responses to relevant NVCA comments to the EIS component of the assignment are



included below. A second NVCA letter was issued on June 27, 2025 that outlined general support for the proposed wetland offsetting strategy outlined in Azimuth's comment response below.

The purpose of this EIS Addendum is to outline additional study undertaken related to the documentation of bat "snag" trees on and adjacent to the property, with potential to provide day or maternity roosting habitat for bat species, and to respond to NRSI and NVCA natural heritage peer review comments. Detailed peer review comments included in *Table 1. NRSI Peer Review Comments on Environmental Impact Study (Azimuth 2024)* of NRSI's December 2024 letter are attached to this EIS Addendum for reference, to which responses are provided on an individual basis below. Azimuth's response to NRSI Peer Review Comment #6 is combined with Azimuth's response to NVCA's EIS comments issued through the March 2025 review letter.

Supplementary 2025 Field Program

Bat Snag Inventory

Several bat species (including Endangered bats Little Brown Myotis, Northern Myotis, Tri-colored Bat, Hoary Bat, Eastern Red Bat, and Silver-haired Bat) may utilize large trees preferably 25 centimetres (cm) diameter at breast height (DBH)) in the early stages of decay, described as "snag" trees – those having cracks, splits, holes, *etc.* that could feasibly provide access for bats. Although larger trees are preferred, trees of any size have potential to be occupied by bats during the active period. Azimuth conducted a detailed inventory of snags within the study area with potential to provide bat access, including all areas within the property boundary and publicly-accessible lands along road right-of-ways and the Hamilton Drain corridor directly north of the property boundary. The screening was completed on April 4, 2025 (during the seasonal "leaf-off" period) to identify suitable snag trees that could potentially be used by bats to establish maternity and/or day roosts during the summer period.

The locations of snag trees documented during the bat snag inventory exercise are illustrated on an updated version of Figure 2 (attached), noting that given the immature/recently disturbed state of the property only eight (8) snag trees were identified, four (4) of which were present on the property, two (2) within the Hurontario Street right-of-way, and the remaining two (2) beyond northern property boundary along the axis of the Hamilton Drain. None of the identified snag trees exhibited high quality features for bat access such as large hollows/holes, rather provided more marginal bat habitat characteristics such as dead limbs/branches and loose bark.

Responses to NRSI Peer Review Comments

Azimuth Response to NRSI Peer Review Comment #1

Channel details on the Hamilton Drain were generalized in the EIS given the watercourse was off property. However, additional channel details can be included as follows. Bank slopes were relatively



steep (2:1) and uniform given the straightened channel morphology, which presumably was straightened and altered historically. Stone substrate was present around the culvert inlet and outlet, but substrate upstream and downstream of the culvert consisted of silt/sand and organic material. Flow within the channel was observed throughout the assessed reach, although was diffuse in segments of dense cattails. The consistent flow and defined flow path/channel banks warranted characterization of the Hamilton Drain as a permanent watercourse feature. However, the overall fish habitat quality within the Hamilton Drain is considered poor given the straightened morphology, lack of pool features, and shallow water depths.

Additional details on the pond can also be provided. During the field investigation, the pond was holding water that was observed to be clear and had a maximum depth of approximately 1 metre (m). The pond was bordered by dense cattails along a majority of the riparian lands, and the center of the pond was open water (measuring approximately 12mx12m). The pond bottom was largely covered in algae, and no inflow/outflow was noted. No fish were observed within the pond.

Azimuth Response to NRSI Peer Review Comment #2

With regard for amphibian breeding surveys, weather and temporal data for the three (3) surveys was recorded as follows:

- April 26, 2024; 9:47pm
 - Temperature 7°C, Cloud Cover 90%, Beaufort windspeed 1, no precipitation
- May 20, 2024; 10:42pm
 - Temperature 19°C, Cloud Cover 50%, Beaufort windspeed 1, no precipitation
- June 19, 2024, 11:53pm
 - Temperature 23°C, Cloud Cover 20%, Beaufort windspeed 1, no precipitation

Azimuth re-affirms that weather conditions were consistent with provincial protocols (*i.e.* Great Lakes Marsh Monitoring Program), as referenced in the EIS. The selected amphibian survey station was sufficiently located such that amphibian breeding activity could be accurately documented throughout wetted portions of the site.

With regard for breeding birds, refer to Table 4 (Breeding Bird Summary) of the EIS which includes detailed weather and temporal data for each site visit. Bird breeding evidence codes in accordance with provincial protocols (*i.e.* Ontario Breeding Bird Atlas methodology) for each site visit are also presented in Table 4.



Azimuth Response to NRSI Peer Review Comment #3

The SWD ecosite on the subject property measures 0.13 hectares (ha) in size and contains one (1) snag tree exceeding 25cm DBH (see updated Figure 2, attached), or, a snag density of 7.69 snags/ha. According to the Ecoregion 6E Criteria Schedules (MNRF, 2015) for the Significant Wildlife Habitat Technical Guide (OMNR, 2000), the minimum snag density for a qualifying ecosite to be considered as potential Bat Maternity Colonies is 10 snags/ha. As such, the SWDM2-2 unit in the northeast corner of the property (extending off-property) does not meet the minimum snag density criterion for further consideration as Significant Wildlife Habitat (SWH) for Bat Maternity Colonies.

Azimuth Response to NRSI Peer Review Comment #4 & NRSI Peer Review Comment #5

Azimuth agrees with NRSI's statement that trees less than 25cm DBH may support maternity or day roost habitats for bats, and requests that this acknowledgement be considered sufficient in lieu of revising the initial EIS report. Azimuth also acknowledges that the quote provided from the Bat Survey Standards Note (MECP, 2022) was shortened in error, and acknowledges the full quote provided in NRSI Peer Review Comment #4 including as it relates to avoidance of fragmentation or barriers for Species at Risk (SAR) bats.

Where it relates to fragmentation of potential SAR habitat, Azimuth provides the below impact assessment to satisfy the request outlined in the December 2024 comment/response matrix, but would highlight that as of June 5, 2025 via adoption of *Bill 5, Protect Ontario by Unleashing our Economy Act, 2025*, the definition of "habitat" under the ESA has been revised to mean (in respect of an animal species), only the "dwelling-place, such as a den, nest or other similar place, that is occupied by one or more members of a species for the purposes of breeding, rearing staging, wintering or hibernating". In the context of SAR bats, Azimuth interprets this revised definition of "habitat" to refer to day or maternity roosting sites used during the active period, but to not include foraging or transit/movement corridors that may provide accessory function for bats.

With regard for SAR bats, the below updated impact assessment is provided with the understanding that *Endangered Species Act, 2007* (ESA) permissions and approvals are a proponent-driven process, and it is the responsibility of the applicant to confirm conformity in accordance with Ministry of the Environment, Conservation and Parks (MECP) requirements. In cases where the proponent is confident that negative impacts to SAR will not occur as a result of a proposed development, there is no requirement to directly engage MECP with regard for permissions or approvals, as MECP does not provide Letters of Advice or routinely "sign off" on development applications.

Based upon additional bat habitat study undertaken in April 2024 described above, the following augmented assessment is provided with regard for potential impacts to SAR bats. An updated Figure



3 (Proposed Development) is attached, illustrating the locations of documented snag trees relative to the proposed development limits.

The proposed development will require the removal of six (6) candidate bat habitat trees for SAR bats, all of which are characterized as **low quality** snag features, with potential opportunities for bat access limited to dead limbs/branches and loose bark. Five (5) of the snag trees in the western portion of the property/Hurontario Street right-of-way were identified as Green Ash (*Fraxinus pennsylvanica*) stems ranging 18-27cm DBH in the early-mid stages of decay, and due to evidence of Emerald Ash Borer (EAB) disease are unlikely to provide supporting leaf cover. Given their decaying condition due to EAB disease, it is likely that the described Green Ash will continue to decline and will fall or potentially require removal (if deemed hazards) independent of this application process.

Documented bat snags on the property are located within an area subject to substantial anthropogenic disturbances, noting that no remaining continuous woodland or other substantive tree cover remains beyond the property's eastern, western, or southern limits. Minor removals of six (6) snag trees and associated hedgerows/other individual trees on the property are not anticipated to fragment potential bat movement between remnant treed areas and retained natural features on adjacent lands. Although only two (2) snag trees (both also Green Ash) were identified along the Hamilton Drain corridor directly north of the property limits, it is notable that directly continuous woodland is located on private lands up to approximately 80m north of the Hamilton Drain, and eastward along the Hamilton Drain to Portland Street, a distance of over 400m from public lands with adjacency to the subject property. It is anticipated that preservation of this corridor on adjacent lands will continue to facilitate day and maternity roosting for SAR bats, and retain a movement corridor within the study area in the post-construction setting.

Based on the above, it remains Azimuth's conclusion that providing tree removal occurs outside of the recommended April 1-September 30 period, no negative impacts to SAR bats would be anticipated as a result of the proposed development.

Azimuth Response to NRSI Peer Review Comment #6/NVCA Environmental Impact Study Comments

Based on updated supporting information prepared by Tatham Engineering ("Tatham"; Preliminary Feature Based Water Budget; Tatham, 2025), Azimuth understands that Wetland #2 demonstrates interaction with the water table such that the wetland would be considered regulated by NVCA under *O.Reg. 41/24*. As such, NVCA permitting is required for the removal of 2,881m² of Wetland #2 and associated 30m vegetated buffer measuring 4,289m². A new Figure 4 (Proposed Wetland Removals) is attached, illustrating the area of proposed wetland and 30m vegetated buffer removals associated with Wetland #2.



With regard for the 30m vegetated buffer area (4,289m²), calculations include all upland vegetation within 30m of Wetland #2, except for the gravel pad (CVC_1) created as part of previous development application, and a minor portion of Wetland #1 representing a manmade Stormwater Management feature created as part of a previous development plan and not subject to NVCA regulation (further discussed in the initial EIS submission, verified in NVCA Comment #4 in the attached March 2025 letter).

In accordance with NVCA's Achieving Net Gains through Ecological Offsetting ("Offsetting Guidelines"; 2021), proposed wetland removals must first satisfy a Mitigation Hierarchy which contemplates the following steps, prior to presenting a proposal for wetland compensation:

- 1) Avoidance of impacts
- 2) Minimization of impacts
- 3) Mitigation of impacts
- 4) Compensation for losses

In the case of the proposed development, through discussions with the proponent it is Azimuth's understanding that avoidance of impacts to Wetland #2 was reviewed and it was determined that no suitable alternative to wetland removals exists, in a manner that would allow the project to remain viable. The proposed development is located within a Settlement Area within the Town of Collingwood and has been subject to substantial direct and indirect interference, including:

- Indirect influences (including hydrological changes) from adjacent residential development beyond eastern property boundary (~2008-2012);
- Installation of adjacent gravel pad and initiation of previous site development (~2008); and,
- Routine farming practices adjacent and partially within wetland boundaries (before 2008).

Based on the above, it is Azimuth's opinion that the proponent has sufficiently considered avoidance and minimization of impacts to the wetland feature, such that the proposed removals satisfy NVCA requirements for Step 1 (Avoidance) and Step 2 (Minimization) of the Mitigation Hierarchy.

With regard for Step 3 (Mitigation), the proposed works are to occur in manner that complies with Erosion and Sediment Controls (ESCs), Best Management Practices (BMPs), timing windows for vegetation removals, and other considerations (such as those related to SAR), described in detail in the initial EIS submission. A portion of Wetland #2 located in the northeast corner of the property (portion of the SWDM2-2 unit) will be maintained in the post-construction setting. The supporting Preliminary Feature Based Water Budget prepared by Tatham concludes that there will be no change



in runoff volume contributing to the off-site portion of the wetland, however there will be an annual infiltration volume deficit of 1,217m³. The Tatham report proposes a soakaway pit be installed in the northeast corner of the development area to account for this deficit, projected to capture 1,575m² of annual volume and therefore mitigate potential interference with the hydrology of the retained portion of the SWDM2-2 polygon. Providing mitigation measures outlined in Tatham's assessment and the initial EIS (e.g. appropriate ESCs/BMPs) are implemented, there is no expectation the proposed development will result in indirect negative impacts to retained portions of the SWDM2-2 feature located proximal to the northeast property limit. It is Azimuth's opinion that providing conformity is demonstrated for the above mitigation measures, the proposed development would satisfy NVCA requirements for Step 3 (Mitigation) of the Mitigation Hierarchy.

Based on the above review, it is Azimuth's opinion the proposed development would be considered eligible for wetland compensation (under Step 4) as outlined in the Offsetting Guidelines. As described above, the quantity of area loss is equal to 2,881m² and the quantity of wetland setback loss (i.e. upland areas within 30m of the wetland edge) is equal to 4,829m². Section 3.2 of the Offsetting Guidelines specifies that a wetland replacement ratio of 2:1 should be implemented for direct wetland losses, and a wetland replacement ratio of 1:1 should be implemented for loss of wetland setback, therefore based on the proposed wetland vegetation removals, the required wetland compensation to achieve ecological gains would be 10,591m² ((2,881m²*2) + 4,829m²).

To achieve net ecological gain for proposed wetland removals, direct onsite creation of a proposed wetland compensation area was considered but deemed not suitable based on lack of available lands. The proponent is therefore proposing to proceed with a cash-in-lieu option described in Section 4.2.1 of NVCA's Offsetting Guidelines, citing a wetland compensation value of \$120,000/ha. Based on this wetland compensation figure, the proposed cash-in-lieu value to offset wetland losses within Wetland #2 is calculated as **\$127,092.00**.

With regard for the above, it is Azimuth's opinion that removal of 2,881m² within Wetland #2 in addition to 4,829m² of the supporting upland 30m vegetated buffer (Figure 3) is eligible for wetland compensation in accordance with NVCA's Offsetting Guidelines, and that payment of \$127,092.00 toward NVCA implementation of wetland creation/restoration projects would achieve a net gain for the proposed wetland losses. As such, with consideration for mitigation and compensation detailed in the initial EIS submission and additional information presented above, there is no expectation that the proposed works would negatively impact Other Wetlands within the study area limits.



Closure

We trust that the above adequately addresses outstanding field studies and comments/concerns raised by NRSI relating to the initial EIS submission, and provides adequate discussion via Azimuth Response to NRSI Peer Review Comment #6 to advance discussion regarding NVCA permissions and approvals for the removal of 0.2881ha of Wetland #2 and associated 30m vegetated buffer.

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

Yours truly,

AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Dan Stuart, M.Env.Sc.

Ecology Lead/Partner

Roger Holmes, M.Sc.

Senior Aquatic Ecologist

Attached:

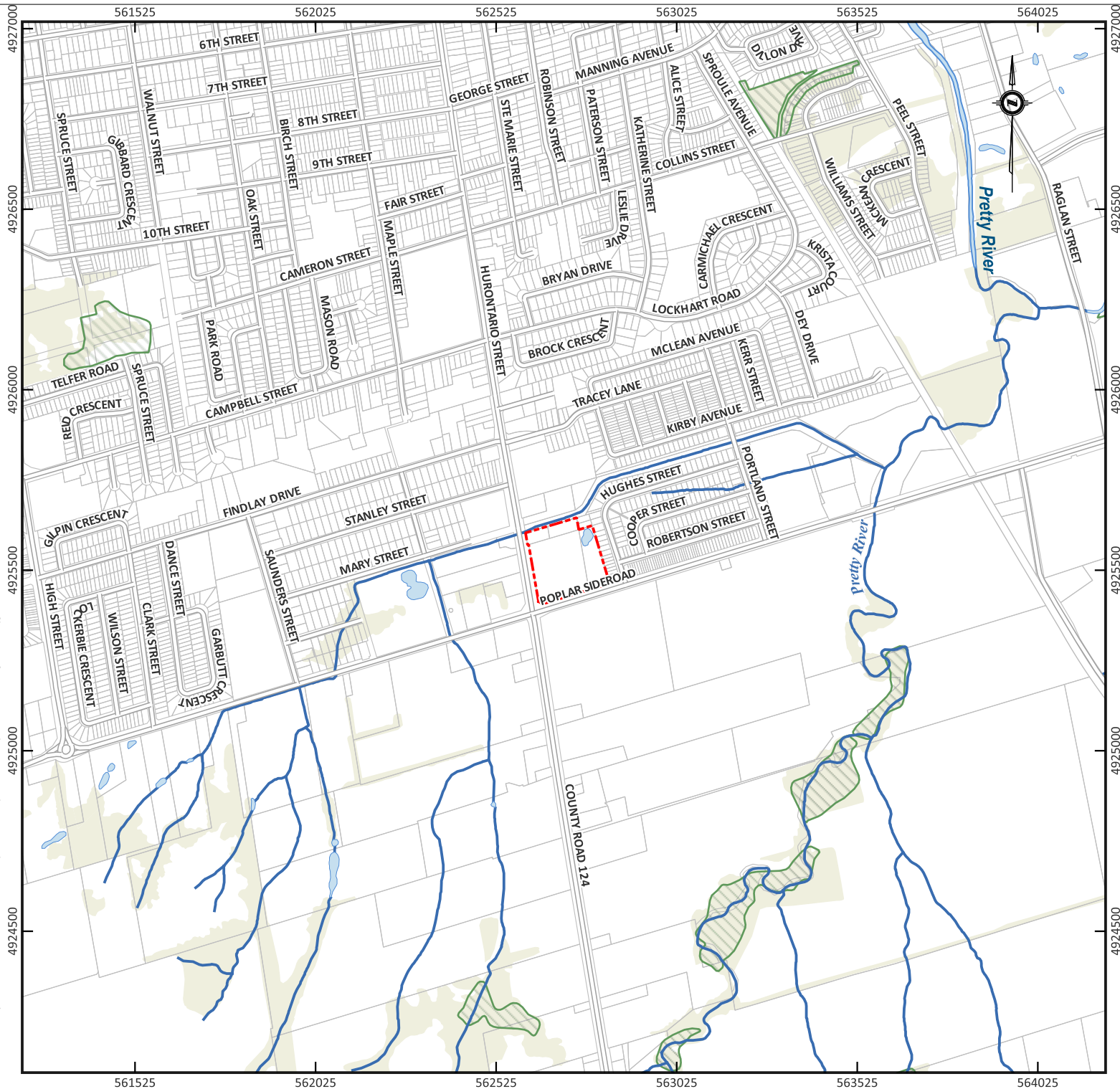
Figure 2 – Environmental Features (Updated)

Figure 3 – Proposed Development (Updated)

Figure 4 – Proposed Wetland Removals

Table 1. NRSI Peer Review Comments on Environmental Impact Study (Azimuth 2024)

NVCA Comments – March 7, 2025



LEGEND

- Approx. Property Boundary
- Waterbody
- Mapped Watercourse
- Unevaluated Wetland
- Wooded Area
- Road

NOTES

- Watercourse, Waterbody, Wetland, Woodland and ANSI layers are derived from MNRF GIS data, retrieved December 2022.
- The metric grid displayed on the map corresponds to NAD83 / UTM zone 17N (EPSG:26917).

REGIONAL MAP

SCALE 1:500000



0 0.25 0.5 0.75
KILOMETERS



SITE LOCATION

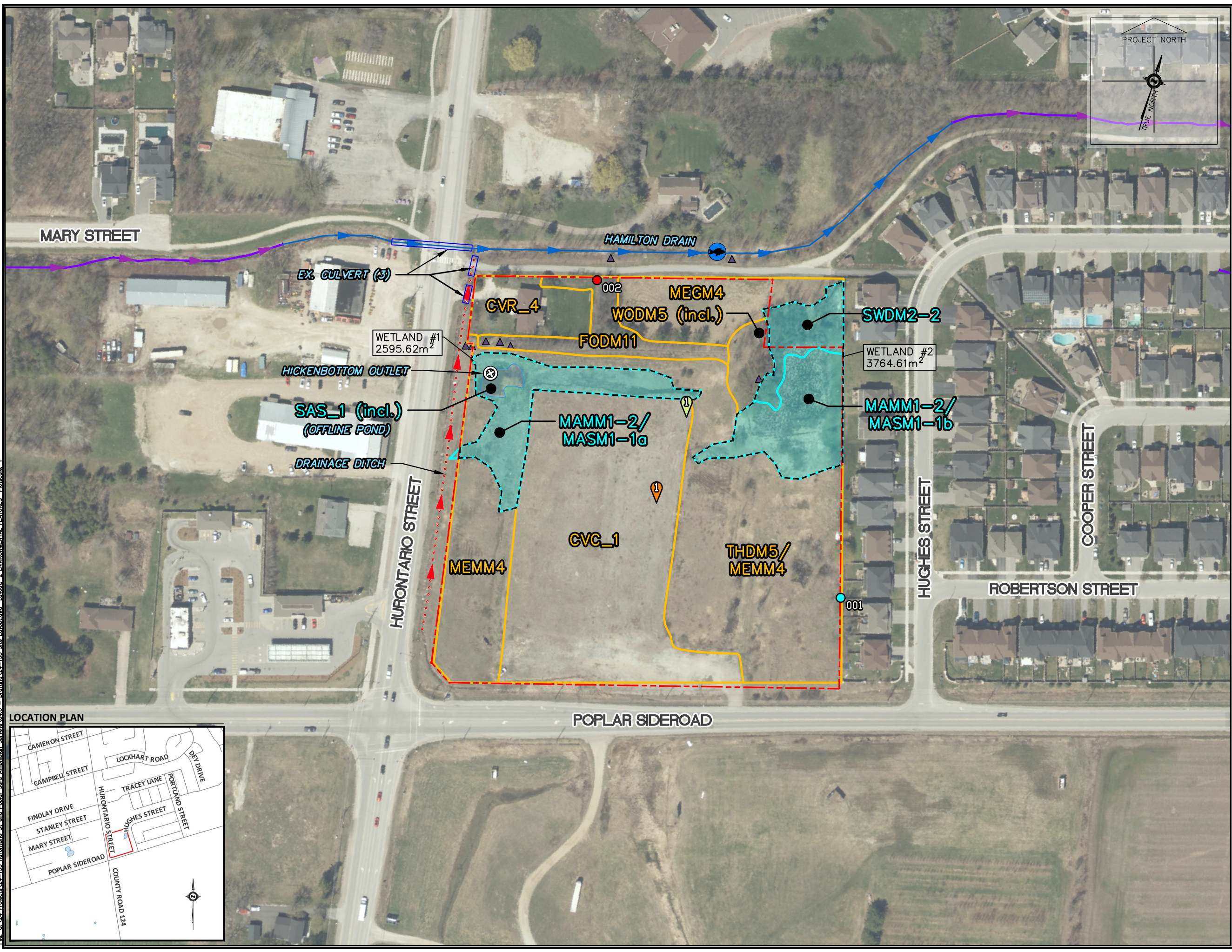
THE GATEWAY CENTRE PHASE 2 & 3
COLLINGWOOD, ON

DATE ISSUED: JULY 2025
CREATED BY: A.L.
PROJECT NO.: 24-153
BASE MAP: MNRF

Figure No.

1

Plotted by: ALU on July 2, 2025 at 3:01pm
File: G:\24 Projects\24-153 Hurontario St and Poplar Sd\Drawings\24-153 Site Layout.dwg Layout: 2 ENVIRONMENTAL FEATURES Plotstyle: 1



LEGEND:

APPROX. PROPERTY BOUNDARY

EXISTING CULVERT

OUTLET LOCATION

FISH HABITAT:

PERMANENT WATERCOURSE/
DIRECT FISH HABITAT

EPHEMERAL DRAINAGE FEATURE/
NOT FISH HABITAT

DRAINAGE FEATURE (NOT ASSESSED)

COLDWATER THERMAL REGIME

ELC UPLAND COMMUNITIES:

CVC_1

BUSINESS SECTOR / GRAVEL AREA

CVR_4

RURAL PROPERTY

MEGM4

FRESH-MOIST GRAMINOID MEADOW

MEMM4

FRESH-MOIST MIXED MEADOW

THDM5

FRESH-MOIST DECIDUOUS THICKET

WODM5

FRESH-MOIST DECIDUOUS WOODLAND

ELC WETLAND COMMUNITIES:

MAMM1-2

CATTAIL MINERAL MEADOW MARSH

MASM1-1

CATTAIL MINERAL SHALLOW MARSH

SAS_1

COMPLEX

SWDM2-2

SUBMERGED SHALLOW AQUATIC

GREEN ASH MINERAL DECIDUOUS SWAMP

incl.

INDICATES INCLUSION

EVENING CALLING AMPHIBIAN
SURVEY STATION

DAWN BREEDING BIRD SURVEY STATION

BUTTERNUT TREE – CATEGORY 1

BUTTERNUT TREE – HYBRID

CANDIDATE BAT SNAGS

0

43.75

87.5

HORIZONTAL SCALE 1:1750

AZIMUTH ENVIRONMENTAL CONSULTING, INC.

ENVIRONMENTAL ASSESSMENTS & APPROVALS

ENVIRONMENTAL FEATURES

THE GATEWAY CENTRE
COLLINGWOOD, ON

DATE ISSUED: JULY 2025

CREATED BY: A.L.

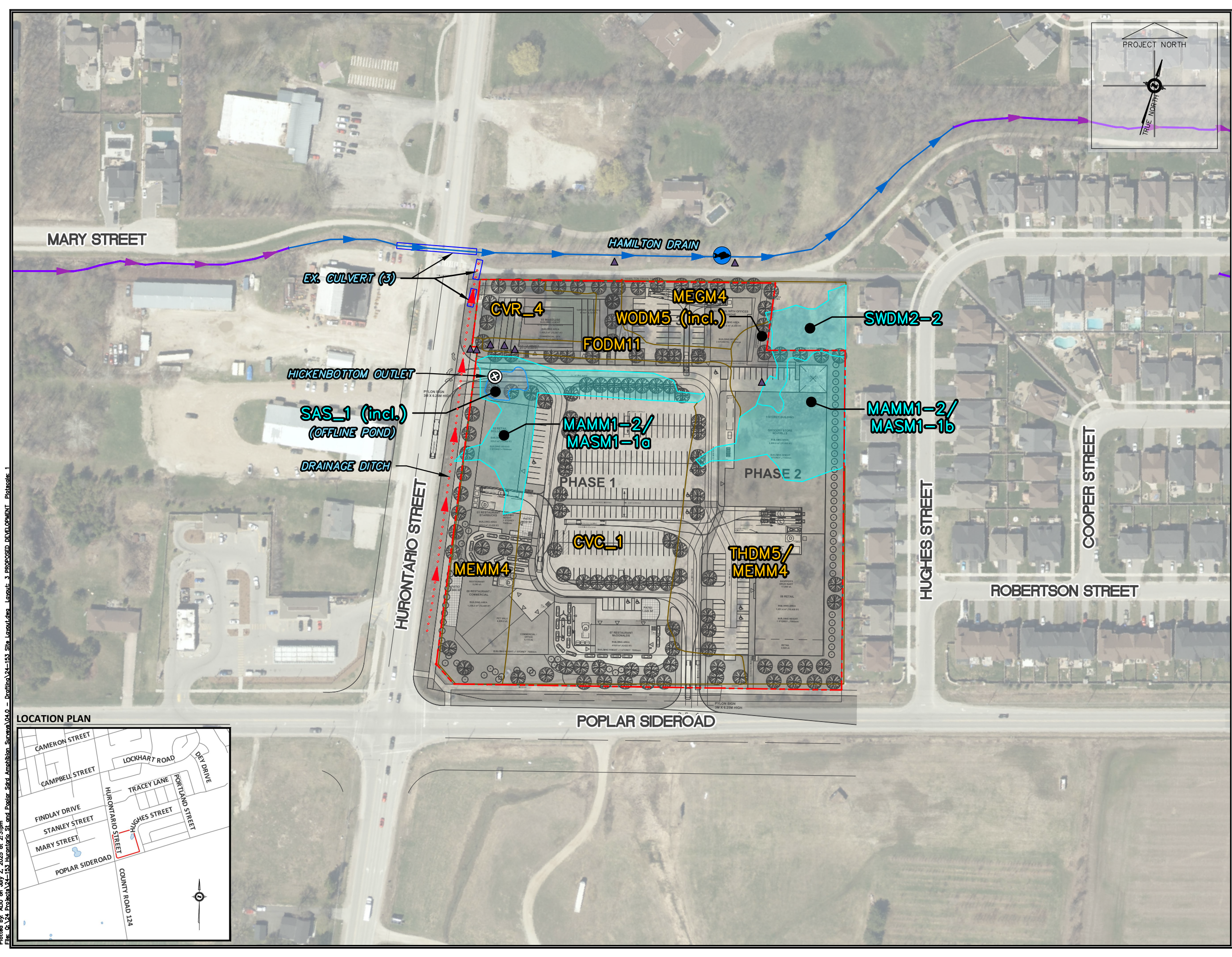
PROJECT NO.: 24-153

REFERENCE: SIMCOE COUNTY

Figure No.

2

Plotted by: ALU on July 2, 2025 at 2:31pm
File: G:\24 Projects\24-153 Hurontario St and Poplar Sd\Amphibian Surveys\04.0 - Draft\24-153 Site Layout.dwg Layout: 3 PROPOSED DEVELOPMENT PlotScale: 1



LEGEND:

--- APPROX. PROPERTY BOUNDARY

--- EXISTING CULVERT

⊗ OUTLET LOCATION

FISH HABITAT:

→ PERMANENT WATERCOURSE / DIRECT FISH HABITAT

→ EPHEMERAL DRAINAGE FEATURE / NOT FISH HABITAT

→ DRAINAGE FEATURE (NOT ASSESSED)

⊗ COLDWATER THERMAL REGIME

ELC UPLAND COMMUNITIES:

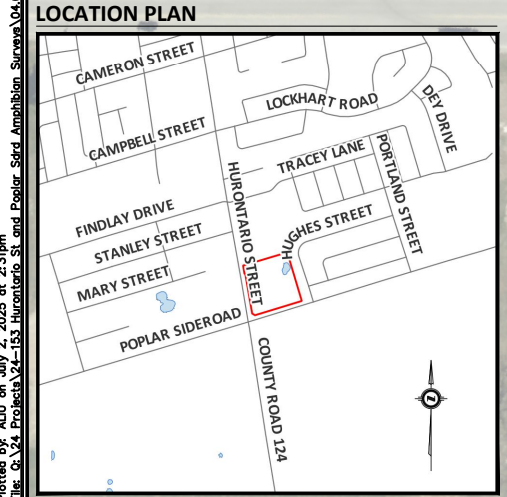
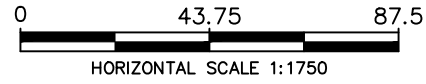
CVC_1 BUSINESS SECTOR / GRAVEL AREA
CVR_4 RURAL PROPERTY
MEGM4 FRESH-MOIST GRAMINOID MEADOW
MEMM4 FRESH-MOIST MIXED MEADOW
THDM5 FRESH-MOIST DECIDUOUS THICKET
WODM5 FRESH-MOIST DECIDUOUS WOODLAND

ELC WETLAND COMMUNITIES:

MAMM1-2 CATTAIL MINERAL MEADOW MARSH
MASM1-1 CATTAIL MINERAL SHALLOW MARSH
SAS_1 SUBMERGED SHALLOW AQUATIC
SWDM2-2 GREEN ASH MINERAL DECIDUOUS SWAMP

incl. INDICATES INCLUSION

△ CANDIDATE BAT SNAGS

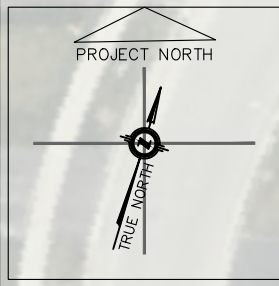
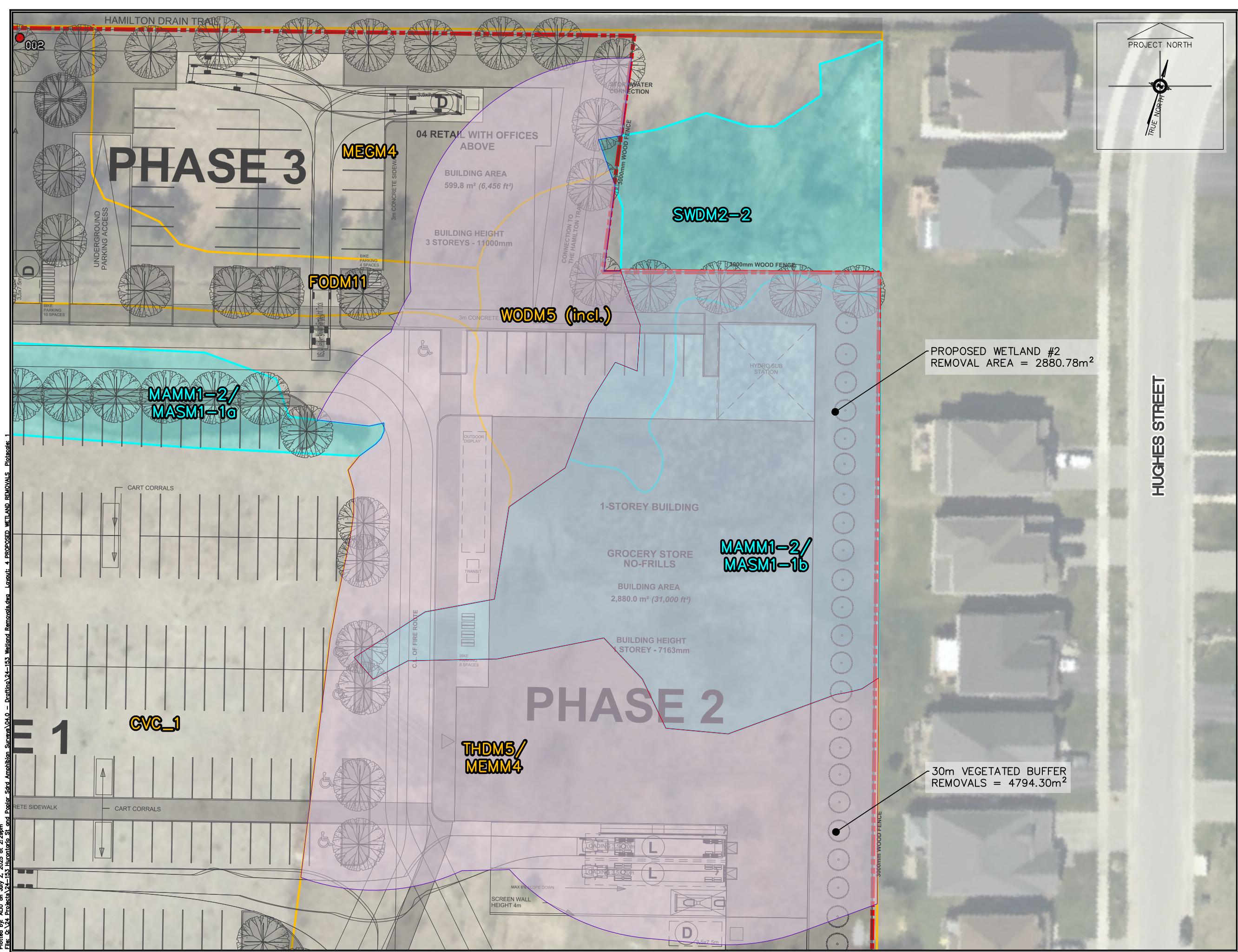


PROPOSED DEVELOPMENT

**THE GATEWAY CENTRE
COLLINGWOOD, ON**

DATE ISSUED:	JULY 2025	Figure No. 3
CREATED BY:	A.L.	
PROJECT NO.:	24-153	
REFERENCE:	SIMCOE COUNTY	

Plotted by: AUJ on July 2, 2025 at 2:29pm
File: G:\V4 Projects\24-153 Hurontario St and Poplar St\4. Wetland Removals.dwg Layout: 4 PROPOSED WETLAND REMOVALS - Plotcode: 1



LEGEND:

--- APPROX. PROPERTY BOUNDARY

ELC UPLAND COMMUNITIES:

CVC_1	BUSINESS SECTOR / GRAVEL AREA
MEGM4	FRESH-MOIST GRAMINOID MEADOW
MEMM4	FRESH-MOIST MIXED MEADOW
THDM5	FRESH-MOIST DECIDUOUS THICKET
WODM5	FRESH-MOIST DECIDUOUS WOODLAND

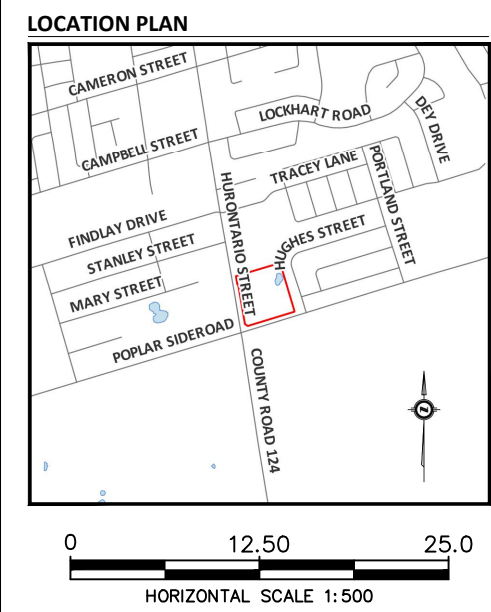
ELC WETLAND COMMUNITIES:

MAMM1-2	CATTAIL MINERAL MEADOW MARSH
MASM1-1	CATTAIL MINERAL SHALLOW MARSH COMPLEX
SWDM2-2	GREEN ASH MINERAL DECIDUOUS SWAMP

incl. INDICATES INCLUSION

WETLAND #2 TO BE REMOVED

30m VEGETATED BUFFER REMOVALS



AZIMUTH ENVIRONMENTAL CONSULTING, INC.
ENVIRONMENTAL ASSESSMENTS & APPROVALS

PROPOSED WETLAND REMOVALS

**THE GATEWAY CENTRE
COLLINGWOOD, ON**

DATE ISSUED:	JULY 2025	Figure No.
CREATED BY:	A.L.	4
PROJECT NO.:	24-153	
REFERENCE:	SIMCOE COUNTY	

Table 1. NRSI Peer Review Comments on Environmental Impact Study (Azimuth 2024)

Comment #	EIS Section	NRSI Peer Review Comment	Response
1	Section 3.5 Fish and Fish Habitat (pg.10) and Section 4.9 Fish and Fish Habitat (pg.17-18)	The methods section (3.5) mentions that the site evaluation included "wetted width, water depths, flow, bank slopes, vegetation communities, substrate material, general morphometrics, and observations of fish...", but the results section (4.9) specifically related to Hamilton Drain omit details on flow, bank slopes, and substrates and also water quality. Currently, it is unclear if the assessing biologists were able to assess these since the drain was off property, however, wetted widths and water depths were provided. It is recommended that details related to flow, bank slope and substrate material for Hamilton Drain are incorporated if available, as per the methods. Also, while it is noted that the on-site pond is offline and doesn't provide fish habitat. Additional details on the characteristics of the pond (water depth, substrates, aquatic vegetation etc.) should also be incorporated for context.	
2	Section 4.2.2 Wildlife (pg.12-13)	Typically, all field survey data, dates, timing, and weather conditions (including temperature, cloud cover, and the Beaufort wind speed) is provided to demonstrate that the required field surveys have been completed under appropriate conditions. While the EIS states that the required protocols have been followed, this data has not been provided. Additionally, the results of the breeding bird surveys should identify the breeding evidence observed for each species for each observation. While NRSI staff agree that the existing habitat on site is likely of low quality, this data is typically provided to support this conclusion. Furthermore, it is unclear why the selected Amphibian Survey Station was not placed within or at the edge of Wetland 2 given that the author/surveyor classified it as the only "feature within the study area with standing water, vernal pools/breeding pools, and/or wetland sloughs and of sufficient size to potentially render significant amphibian breeding function." While, the station location is not expected to hinder the results of the survey, in future, it is recommended that amphibian monitoring stations are placed closer to the identified suitable habitats.	
3	Section 4.7 Significant Wildlife Habitat (pg.17) and Table 5 Significant Wildlife Habitat Criteria Schedule for Ecoregion 6E (pg.3 of 17)	Table 5 provides the results of the Significant Wildlife Habitat screening for the subject property. Under the wildlife habitat section for "Bat Maternity Colonies", it is stated that a SWD Ecosite is present within the subject property. This Ecosite is considered eligible to support bat maternity SWH. However, the SWH screening table within the EIS states that this Ecosite is too small to be considered a standalone vegetation community and not anticipated to be of sufficient maturity to support bat maternity SWH. Under strict guidelines of the Ecoregion Criteria Schedule for 6E, there is no minimum habitat size criteria for bat maternity SWH Candidate habitat is determined by FOD, FOM, SWD and SWM stands with >10/ha large diameter (>25cm DBH) wildlife trees. It is recommended that the screening table be revised to remove any reference to the size of the SWD community in reference to the potential absence or presence of SWH. The assessment of potential SWH should be informed by the completion of field surveys examining whether or not the Ecosite contains the	

Comment #	EIS Section	NRSI Peer Review Comment	Response
		minimum density (>10/ha) of wildlife large diameter trees (>25cm DBH). It is understood that habitat surveys were conducted during leaf-on conditions. While it is noted these surveys were conducted outside of suitable conditions, it is anticipated that the previously conducted field surveys should allow for the identification of Candidate Bat Maternity SWH. Should candidate habitat be determined to be present, Section 4.7 is to be updated.	
4	Section 7.1 Habitat for Threatened or Endangered Species (pg.19-21)	NRSI staff agree that the EIS is to account for Species at Risk Bats including, Little Brown Myotis, Northern Myotis, Tri-colored Bat. The EIS states that trees >25cm DBH within woodlands may provide maternity roosting habitats to SAR bats and later states that “Trees of any size with suitable opportunities for bat access may also be utilized for day roosting purposes during the remainder of the active period.” NRSI staff disagree with this characterization of habitat use. As per the technical document referenced by Azimuth within this section (<i>Bat Survey Standards Note (MECP, 2022)</i>), there are numerous peer-reviewed publications identifying that trees measuring less than 25cm DBH may support both maternity and day roosts of Little Brown Myotis, Northern Myotis and Tri-colored Bat. As a result, this statement is incorrect. It is recommended that the SAR section of the EIS be revised to remove or update this statement to appropriately identify that trees <25cm DBH may support both day and maternity roosting habitat. NRSI staff also disagree with the use of the incomplete quote from the Bat Survey Standards Note (MECP 2021), as the quote referenced within the EIS omits an important detail that is required to understand suitable habitat availability and potential impacts. It is recommended that the full quote is provided within the EIS. As per the Bat Survey Standards Note, <i>If a proposed activity will avoid impairing or eliminating the function of habitat for supporting bat life processes (e.g. remove, stub, etc. a proportionally small number of potential maternity or day roost trees in treed habitats which would not result in fragmentation or barriers) and the timing of tree removal will avoid the bat active season (April 1 – September 30 in Southern Ontario / May 1 to August 31 in Northern Ontario), then there is no need to conduct SAR bat surveys of treed habitats.</i> In order for this exemption to be applicable, the author needs to determine whether or not the removal of subject property treed habitat for development will fragment the habitat and/or create habitat barriers, particularly since leaf-off habitat surveys were not conducted. Should the EIS effectively demonstrate that the development will not fragment habitat or create habitat barrier, NRSI staff generally agree that that avoiding vegetation removal during the bat active period is a suitable approach to avoid harm to individuals of the species and thereby avoid contravention of Section 9 of the Endangered Species Act. It is noted that this section identifies that the “<i>proposed works involving removal of a small number of immature snag trees</i>” would not result in an impact to SAR bats or their habitat. No data or mapping to illustrate the number of snag trees proposed for removal has been provided and leaf-off surveys have not been completed. While it is understood that the majority of potential roosting trees are limited to immature Green Ash impacted by Emerald Ash Borer, the	

Comment #	EIS Section	NRSI Peer Review Comment	Response
		specific number of potential habitat tree should be identified in order to support the conclusion that only a “relatively small number” of potential habitat trees will be removed. This assessment should consider that trees smaller than 25cm DBH may provide maternity roosting habitat and declining Ash trees are known to provide suitable roosting features. The EIS has offered that “the proposed development would retain similar wooded areas directly north of the property boundaries...which would provide potential day roosting function for bats in the post-development setting”. The preservation of existing off-site features on lands not owned by the applicant cannot be used to rationalize the avoidance of impacts to the form of function of features within the subject property. Further, it appears that no assessment or characterization of the wooded features north of the property has been completed by the Azimuth. As a result, no evidence has been provided to support the claim that day roosting is occurring within these areas. This section of the EIS should be revised. It is also recommended that the EIS (or addendum) include discussion on the proposed Landscape Plan and plantings as they relate to the mitigation and offsetting of the removal of treed habitats.	
5	Table 1. Species at Risk Screening (pg. 2 of 3)	Table 1 provides the results of the Species at Risk Screening. Under the Initial Assessment column for Little Brown Myotis, Northern Myotis and Tri-colored Bat, the following is stated: “Wooded areas consist of several linear hedgerows, not typical of woodland features utilized by the species for maternity roosting purposes.” and “Trees associated with hedgerows throughout the study area may provide marginal day roosting function for bats throughout the active period.” As the bat habitat surveys during the leaf-off season have not been completed in accordance with bat survey standards and guidelines, there is no concrete field survey evidence or research evidence to support the statements presented by Azimuth in the screening table. As previously stated, individual trees and trees smaller than 25cm DBH may provide maternity roosting habitat to SAR bats. It is recommended that the Initial Assessment columns for these species are revised to acknowledge that suitable surveys were not conducted to comment on the suitability of wooded areas and linear hedgerows.	
6	Wetlands	As identified in Appendix C of the EIS and determined during the arranged site visit; an NVCA regulated wetland may be considered present within the northeast corner of the subject property. Subject to the results of the proposed recommended groundwater monitoring of the identified feature, Ontario Regulation 41/24 may be applicable to this property if development works proposed within any identified NVCA regulation areas. It is understood that NVCA staff have directed the applicant to install piezometers (at least 2) within the wetland to collect data to inform the feature-based water balance as part of the determination of whether or not the feature is groundwater-fed and therefore considered a wetland under the applicable regulations. It is anticipated that the presence/absence of wetland within the subject property should be confirmed in advance of approval of the proposed development. As such, all wetland permit and encroachment issues will be reviewed by the NVCA.	



Nottawasaga Valley
Conservation Authority

March 7, 2025

SENT BY EMAIL

Town of Collingwood
97 Hurontario Street
Collingwood, ON
L9Y 2L8

Attn: Nathan Wukasch
Senior Planner
nwukasch@collingwood.ca

Dear Nathan,

**RE: Proposed Official Plan Amendment/Zoning By-law Amendment
"The Gateway Centre"
Town File No. D084124
853, 869 Hurontario Street, 7564 Poplar Sideroad,
NVCA ID # 27574**

Nottawasaga Valley Conservation Authority [NVCA] staff has reviewed the above noted OPA and ZBA for a proposed redevelopment of the site for residential and commercial purposes.

The applicant proposes the construction of commercial buildings located on the portion of the subject lands designated Residential and in a Deferred Residential Zone, and a proposed 12-storey mixed-use building on the portion of the lands designated Highway Commercial and located within the Highway Commercial C5 Zone.

NVCA staff have received and reviewed the following documents submitted with this application:

- Memo re: The Gateway Centre, 7564 Poplar Sideroad, Town of Collingwood – NVCA Wetland Response. 10 January 2025. Tatham Engineering.
- Environmental Impact Study for a Proposed Development on Part of Lot 40, Concession 8 (The Gateway Centre), Town of Collingwood. September 9 2024. Azimuth Environmental Consulting Inc.

Staff has reviewed this application as per our delegated responsibility from the Province to represent provincial interests regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024) and as a regulatory authority under Ontario Regulation 41/24. The application has also been reviewed through our role as a public body under the Planning Act as per our CA Board approved policies. Finally, NVCA has provided comments as per our Municipal Partnership and Service Agreement with the Town of Collingwood.

Please note that these comments are intended to ensure consistency with the Natural Hazard Policies of the PPS **and** to proactively support the proposed development in meeting the requirements for permit issuance.

Ontario Regulation 41/24

1. The property falls partially within an area affected by Ontario Regulation 41/24 where a permit is required from the NVCA under the Conservation Authorities Act prior to development.

The area is affected by the regulation due to the Pretty River Floodway, unevaluated wetland, floodplain, meander erosion hazard areas and associated buffers.

Natural Hazard - Regulatory Comments

Policies contained within the PPS restrict development to areas outside of hazardous lands adjacent to shorelines and large inland lakes as well as river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards.

NVCA Wetland Response Memo Review:

2. Data coverage for groundwater monitoring within the wetland is a concern with only one sample date outside the high groundwater season. Through consultation with the applicant in November 2024, NVCA requested piezometric monitoring data between March – October at a minimum to capture high water levels; whereas one sample date outside this window was recorded in the memo. Typically, consecutive monthly measurements across 1-2 years of monitoring are necessary to characterize a wetland hydroperiod and groundwater interaction. The Tatham memo notes that "the conditions observed during the December site visit may fluctuate during the year and there is a potential at some times of the year when the groundwater levels are higher and the wetland feature may be a groundwater fed system." This is a notable provision, as there does not appear to be sufficient data to conclude that the wetland within the subject site and off-site does not receive groundwater during the spring freshet. Additional monitoring during the requested timeframe should be completed to characterize groundwater interactions within the site to inform the design of the proposed development.
3. The report notes that soil permeability within the wetland may limit upward groundwater flows during high groundwater levels: "Based on the soil conditions on-site as shown on Figure 3, if the groundwater levels below the wetland were to raise in the wet spring months the silt/clayey silt layer underlying the wetland would impede the upward groundwater flow ultimately restricting any groundwater contribution to the wetland due to its impermeable nature" but the data does not corroborate this assumption. Groundwater levels were observed within the silt/clayey silt in MW115 and MW103, indicating a low degree of permeability within this layer. Alternatively, surrounding the wetland the soils are permeable sand/gravel/tills, which could contribute flows across the overall flow gradient to the wetland. Further study to fully understand this relationship should be documented to support the partial removal of this wetland.

Environmental Impact Study Review

4. The west wetland is confirmed to be an old SWM facility which is not regulated by the NVCA for wetland interference, although the hydrologic functions of this feature will be expected to be replicated/approximated through the engineering design.

5. Wetland feature #2 on the north east corner of the parcel appeared to be groundwater-fed; characterizing the degree of dependence of this feature on groundwater vs surface water is essential to determine whether the part of the feature on the subject site can be removed through a compensation plan without affecting the feature on abutting lands. It is acknowledged that groundwater data collection is underway at that an updated EIS addendum will be provided at such time as an appropriate dataset is acquired. **The applicant is advised that the minimum coverage period for wetland groundwater data to characterize hydroperiod functions is from March – October.** Ideally 1-2 years of data is provided.
6. The EIS notes that 0.39ha of the east wetland feature is proposed to be removed and that following completion of the groundwater monitoring, an addendum will be issued with the applicants proposed offsetting strategy. NVCA staff look forward to reviewing the proposed compensation plan which will be required to support the proposed development.
7. The applicant was advised through a virtual meeting to install piezometers (at least 2) within the wetland to collect data to inform the feature-based water balance that is required as the preliminary hydrogeologic reporting indicates a permit to take water (PTTW) will be warranted for the proposed development. The basis for requiring a feature-based water balance is to ensure hydrologic functions maintained in the post-development conditions and no off-site impacts to the retained wetland on the abutting property are incurred. It is understood from the technical memo by Tatham that piezometers have been deployed within the wetland to monitor groundwater levels to characterize the ground-surface flow relationships of this feature.
8. The two storey underground parking proposed may not be feasible given the high groundwater table, wetland constraints and proximity of the watercourse to the north. The groundwater drawdown zone of influence as a result of permanent de-watering in the PTTW would likely impact these features, and possibly the watercourse to the north, and must be characterized. The applicant has verbally acknowledged this recommendation and indicated they would discuss a potential revision to the concept plan with their client. NVCA ecology staff would support revision of the concept plan or design measures to minimize impacts to local groundwater-fed features.

Additional Advisory Comments

Stormwater Management:

It is our understanding that through the planning/building permit process, additional details such as stormwater management to ensure water quantity and outlet issues associated with more intensive development is addressed.

Conclusion

The NVCA does not support the application as presented. Additional information is required to characterize the wetland on the site and review the proposed development. It is also acknowledged that the development concept, particularly the underground parking, may be revised in a subsequent submission due to groundwater constraints. A more detailed review will be provided at such time as the requested groundwater data and updated EIS Addendum is provided in subsequent submissions, as available.

Please feel free to contact the undersigned at extension 278 or dmetheral@nvca.on.ca should you require any further information or clarification on any matters contained herein.

Sincerely,

Davin Metheral

Davin Metheral
Planner