



Environmental Assessments & Approvals

October 9, 2025

AEC 23-226

Rayville Developments (Legacy) Inc.

Attention: Andy Kidd

Re: **Proposed Wetland Offsetting Strategy for a Proposed Residential Development (Linksview Subdivision) on Part of Lot 43, Concession 11 (780 Tenth Line), Town of Collingwood**

Andy Kidd:

Azimuth Environmental Consulting, Inc. (Azimuth) has reviewed natural heritage peer review comments prepared by Natural Resource Solutions Inc. (NRSI) on behalf of the Town of Collingwood (the "Town") with respect to the Scoped Environmental Impact Study (EIS) Update prepared for a redline revision to an approved draft plan of the Linksview Subdivision on Part of Lot 43, Concession 11 (also referred to as 780 Tenth Line) in the Town of Collingwood. The original EIS submission was prepared by Azimuth on December 17, 2014, and the Scoped EIS Update was prepared on May 2, 2024. Peer review comments relating to the Scoped EIS Update submission were prepared by NRSI in a letter dated November 5, 2024, and a subsequent letter dated September 10, 2025. An EIS Addendum to the May 2024 submission has been prepared and submitted under a separate cover.

NRSI provided comments with regard for the proposed removal of minor wetlands and adjacent upland areas to accommodate the proposed residential development, indicating support for Azimuth to liaise directly with Nottawasaga Valley Conservation Authority (NVCA) to determine applicability of *Ontario Regulation 41/24*. The purpose of this letter is to outline Azimuth's methodology to refine wetland limits proximal to the proposed development boundary, provide discussion and outline a wetland compensation strategy in conformity with NVCA's Achieving Net Gains Through Ecological Offsetting policy ("Offsetting Guidelines"; September 2021).

Wetland Staking

A wetland staking exercise occurred with NVCA, Azimuth ecologist, and a qualified surveyor on August 29, 2025 that included the three (3) MAM2-5 (incl.) features in proximity to the development footprint. Refined wetland boundaries are illustrated on updated Environmental Features (Figure 2) and Proposed Development (Figure 3), attached.



Proposed Wetland and Buffer Removals

Based on the results of the wetland staking exercise conducted between Azimuth and NVCA, relative to the outer grading limit of the proposed development, direct removals of all three (3) minor meadow marsh inclusion units are proposed, including:

- MAM2-5 (incl.) west unit: $1,138\text{m}^2 = 0.11\text{ha}$
- MAM2-5 (incl.) central unit: $1,748\text{m}^2 = 0.17\text{ha}$
- MAM2-5 (incl.) east unit: $1,498\text{m}^2 = 0.15\text{ha}$
 - Total direct wetland removals: **$4,384\text{m}^2 = 0.44\text{ha}$**

Wetland buffer areas within 30m of MAM2-5 (incl.) wetlands proposed for removal as a result of the proposed development are calculated as follows:

- MAM2-5 (incl.) west and central units: $5,460\text{m}^2 = 0.55\text{ha}$
- MAM2-5 (incl.) east unit: $3,367\text{m}^2 = 0.34\text{ha}$
 - Total 30m wetland buffer removals: **$8,827\text{m}^2 = 0.88\text{ha}$**

With regard for the 30m vegetated buffer area ($8,827\text{m}^2$), calculations include all upland vegetation within 30m of the wetlands, except for areas under active agricultural management (OAG codes), and a linear 10m vegetated buffer to be retained along a portion of the northern property boundary. Wetland buffer removal areas illustrated in Figure 3 (attached) illustrate portions of upland vegetation communities within 30m of wetland limits subject to removals under the proposed development plan.

Based on the above review, NVCA permitting is required for the direct removal of $4,384\text{m}^2$ of three (3) MAM2-5 inclusions and associated 30m vegetated buffer measuring a cumulative $8,827\text{m}^2$.

NVCA Mitigation Hierarchy

In accordance with NVCA's Offsetting Guidelines, 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 the wetland units 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:

- Historical direct ploughing and attempted agricultural land uses (before 2013).
- Ongoing routine farming practices adjacent to wetland boundaries.
- Indirect influences (including hydrological changes) from adjacent golf course development (before 1989) and ongoing maintenance.
- In the case of the eastern MAM2-5 (incl.) unit, ongoing roadway activity and maintenance associated with Tenth Line.

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 and subsequent EIS Addendum. A post-development wetland water balance assessment should be prepared at the detailed design stage, recommended to be carried forward as a condition of Draft Plan Approval. 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 4,384m² and the quantity of wetland setback loss (*i.e.* upland areas within 30m of the wetland edge) is equal to 8,827m². 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 17,595m² ((4,384m²*2) + 8,827m²).

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 is calculated as **\$211,140.00**.

With regard for the above, it is Azimuth's opinion that removal of 4,384m² within the three (3) MAM2-5 (incl.) units in addition to 8,827m² 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 \$211,140.00 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, subsequent EIS Addendum, and additional information presented above, there is no expectation that the proposed works would negatively impact wetlands within the study area limits.

Closure

We trust that the above sufficiently addresses NVCA requirements related to demonstration of net gains through ecological offsetting, as described in the NVCA Offsetting Guidelines. If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Dan Stuart, M.Env.Sc.

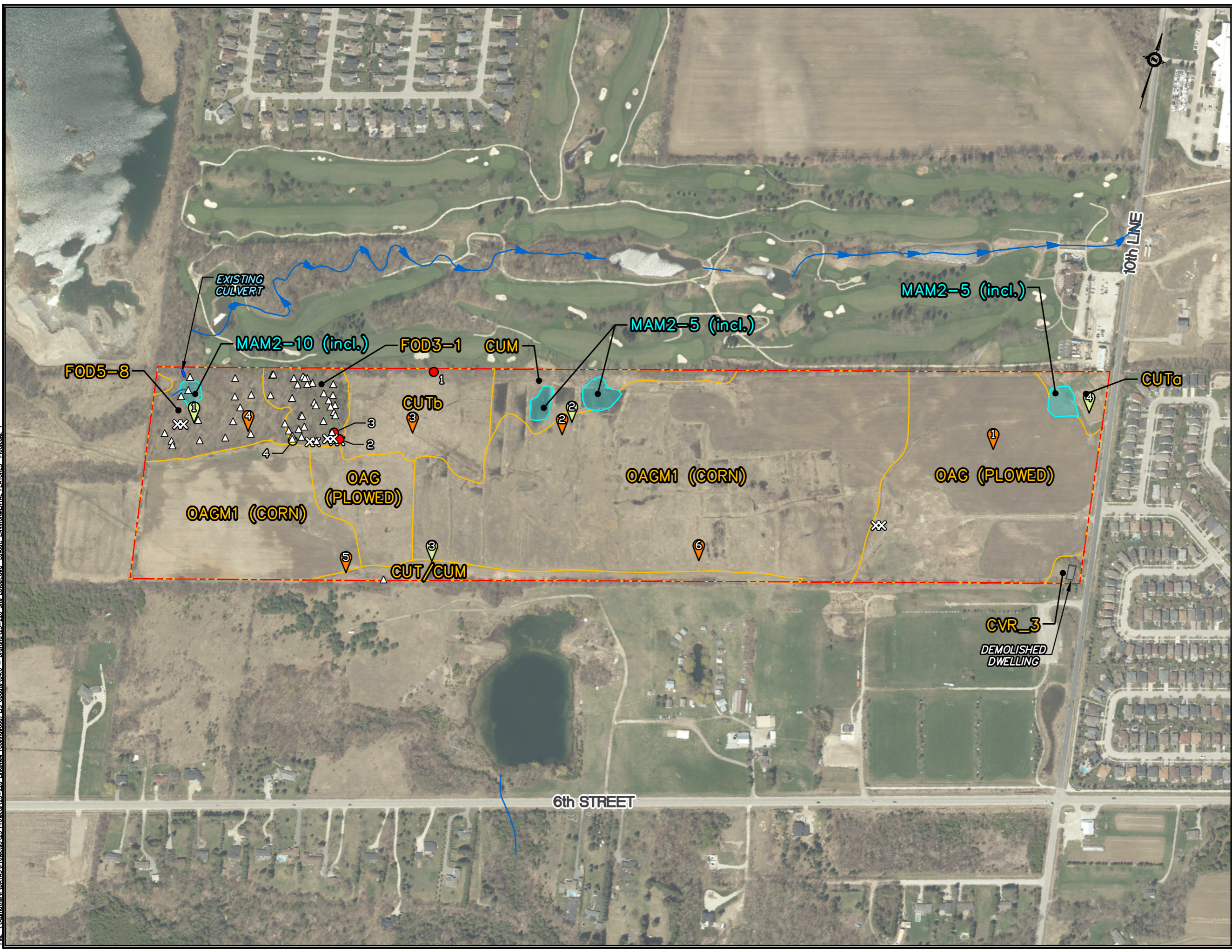
Ecology Lead/Partner

Attached:

Figure 2 – Environmental Features (Updated)

Figure 3 – Proposed Development (Updated)

Plotted by: ALU on September 22, 2025 at 11:13am
 File: \\schmitt\work\DATA\3\Projects\23-226_Site\Layout\04.0 - Part\04.03-226_Site_Layout.dwg Layout: ENVIRONMENTAL_FEATURES_PlotScale: 1



LEGEND:

- APPROX. PROPERTY BOUNDARY
- ▶ WATERCOURSE
- - -▶ INTERMITTENT DRAINAGE FEATURE
- ▭ CULVERT

ELC UPLAND COMMUNITIES:

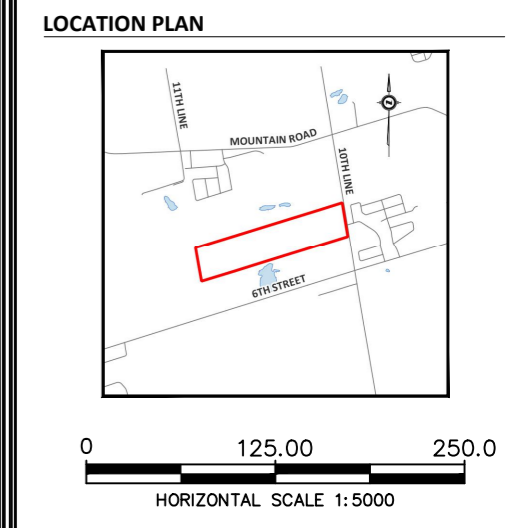
- CVR_3 SINGLE FAMILY RESIDENTIAL
- CUM CULTURAL MEADOW
- CUT CULTURAL THICKET
- FOD3-1 DRY-FRESH POPLAR DECIDUOUS FOREST
- FOD5-8 DRY-FRESH SUGAR MAPLE-WHITE ASH DECIDUOUS FOREST
- OAGM1 ANNUAL ROW CROPS
- OAG OPEN AGRICULTURE

ELC WETLAND COMMUNITIES:

- MAM2-5 (incl.) NARROW-LEAVED SEDGE GRAMINOID MINERAL MEADOW MARSH (WETLAND INCLUSION)
- MAM2-10 (incl.) MIXED FORB MINERAL MEADOW MARSH (WETLAND INCLUSION)

BUTTERNUT TREE SYMBOLOGY:

- BUTTERNUT TREE - CATEGORY 1
- BUTTERNUT TREE - CATEGORY 2
- △ BAT SNAG LOCATION
- XX ROCK PILE
- 📍 DAWN BREEDING BIRD SURVEY STATION
- 📍 EVENING CALLING AMPHIBIAN SURVEY STATION







ENVIRONMENTAL ASSESSMENTS & APPROVALS

ENVIRONMENTAL FEATURES

PART OF LOT 43, CONCESSION 11
COLLINGWOOD, ON

DATE ISSUED: SEPTEMBER 2025	Figure No.
CREATED BY: A.L.	2
PROJECT NO.: 23-226	
REFERENCE: SIMCOE COUNTY	

LEGEND:

-  APPROX. PROPERTY BOUNDARY
-  WATERCOURSE
-  INTERMITTENT DRAINAGE FEATURE
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 WETLAND SETBACK

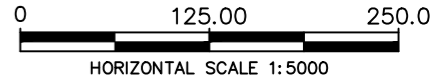
 WETLAND REMOVAL

 WETLAND BUFFER REMOVAL

 WOODLAND REMOVAL

BUTTERNUT TREE SYMBOLOGY:

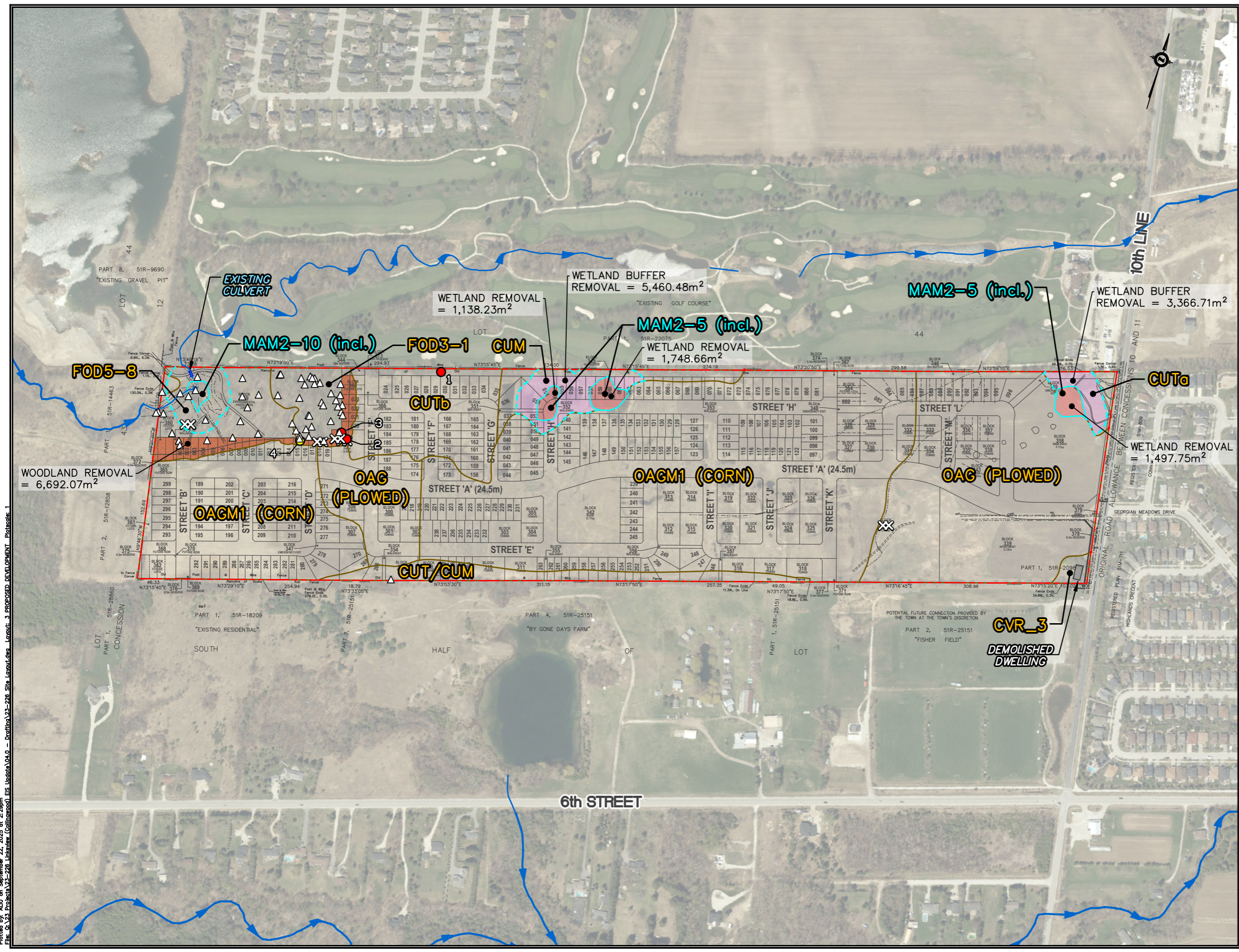
-  BUTTERNUT TREE - CATEGORY 1
-  BUTTERNUT TREE - CATEGORY 2
-  BAT SNAG LOCATION
-  ROCK PILE



PROPOSED DEVELOPMENT

**PART OF LOT 43, CONCESSION 11
COLLINGWOOD, ON**

DATE ISSUED:	SEPTEMBER 2025	Figure No.
CREATED BY:	A.L.	3
PROJECT NO.:	23-226	
REFERENCE:	SIMCOE COUNTY	



Plotted by: ALU on September 22, 2025 at 2:09pm
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