



April 21, 2023

2396

Hilco Capital c/o Hugh Whitcomb
80 New Bond Street
London, United Kingdom
W1S 1SB

Dear Mr. Whitcomb,

**RE: 65 Northfield Drive West, Waterloo (Former Kraus Flooring Property)
Environmental Impact Study Addendum**

Natural Resource Solutions Inc. (NRSI) was retained in March 2020 to prepare a Scoped Environmental Impact Study (EIS) in support of a proposed mixed-use development at 65 Northfield Drive, Waterloo, Ontario. The property is currently occupied by an industrial complex (former Kraus Carpets and Flooring), which closed in 2019. The requirement of an EIS was triggered by the presence of two 'Supporting Natural Features' identified in the City of Waterloo's Official Plan (2020) within the vicinity of the subject property: a perennial watercourse and an isolated woodland. A portion of the lands are located within the regulation limit of the GRCA associated with the Floodplain of Forwell Creek which also triggered their EIS policies.

The EIS was developed in accordance with the Grand River Conservation Authority (GRCA) guidelines for EIS reports (GRCA 2005) and the City of Waterloo's Official Plan (2020). A Terms of Reference was scoped for the EIS and approved by the reviewing agencies. The EIS summarized background information on natural heritage features within and adjacent to the property, as well as results of original field surveys of flora and fauna in the study area. The detailed characterization of existing natural features was used to inform an analysis of the significance and sensitivity of the natural features within the study area with consideration for GRCA and City of Waterloo policies.

NRSI has reviewed the revised development plans for the property provided by the Project Team (Walter Fedy and GSP Group) in support of an Official Plan Amendment (OPA) and Zoning Bylaw Amendment (ZBA) (Map 1). I understand the new concept includes approximately 3,980 purpose built rental units, non-residential uses, and a large central park. The development will be accessed by a crescent shaped municipal roadway and serviced by an existing sanitary sewer and watermain. Underground parking is proposed for all blocks, including the park and a three-story above-ground podium parking structure is also proposed adjacent ON-85 which will also function as a noise barrier. A pedestrian bridge which was identified in the 2020 EIS continues to be explored but is not part of the current OPA and ZBA applications.

To inform this EIS Addendum, NRSI has also reviewed the City of Waterloo's comments on the 2020 EIS (dated March and April 2022). Because the current planning applications do not include the pedestrian bridge, the City's comments on the EIS with regards to this part of the development have not been addressed. The proposed changes to the development plans

within the subject property have little to no impact on the conclusions in the 2020 EIS with regards to the subject property.

In their comments, the City indicated *“The Scoped EIS maps and describes the intermittent/ephemeral features on site. It needs to be confirmed whether these features meet the Official Plan’s definition of “intermittent watercourse” and whether the corresponding policies in Section 8.2.5 apply.”* The City defines an intermittent watercourse as a watercourse that is dry at times of the year but generally flows during wet seasons. These are classified as Supporting “B” Natural Features in the Official Plan. The GRCA defines a watercourse as an identifiable depression in the ground, in which a flow of water regularly or continuously occurs. Based on these definitions of the drainage ditch adjacent to the property, the feature meets the criteria to be considered an intermittent watercourse. Under the proposed development scenario no modifications to the form or function of the intermittent watercourse are proposed. The limit of development will be 14m from the property line and 21-23m from the bankfull channel. The footprint of the development will remain within the existing developed lands. Given the location of the feature and its function as a ditch along the highway, no naturalization or plantings are recommended along this feature which is within the MTO right-of-way.

Consistent with the 2020 EIS, direct impacts associated with the proposed development are limited to the removal of vegetation and several isolated trees, primarily comprised of non-native or invasive species. Other vegetation to be cleared includes shrubs, forbs, and grasses from the proposed development footprint. No significant plant species or vegetation communities were identified on the property. A Tree Preservation Plan would be prepared in support of future Site Plan applications.

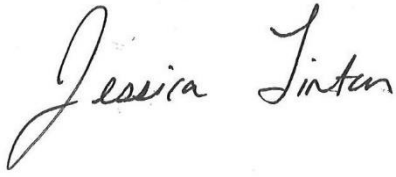
Potential for indirect impacts associated with the updated development plans are limited to erosion and sedimentation associated with construction and impacts to the quality and quantity of water being discharged from the site (and ultimately Forwell Creek). The 2020 EIS provides recommendations for the development of a sediment and erosion control plan, for which no updates are required.

The updated development plans result in more impervious surfaces than the proposed condition, therefore no further quantity control is proposed. Quality control is still proposed to be provided by means of oil-grit separators within the municipal right-of-way, primarily designed to remove 80% of long-term total suspended solids from the road runoff (Walter Fedy 2023). Major overland flow will be directed towards the intermittent watercourse on ON-85. Consistent with the 2020 EIS, under the proposed condition, surface water runoff will be controlled and infiltration within the subject property will increase. As such, no negative impacts to fish or fish habitat are anticipated based on the proposed development and associated storm water management strategy.

Mitigation measures identified in Table 1 of the 2020 EIS are still recommended for the proposed development.

In summary, NRSI has reviewed the updated development plans including supporting documents. Based on this review, the conclusions regarding potential environmental impacts have not changed.

Sincerely,
Natural Resource Solutions Inc.

A handwritten signature in black ink that reads "Jessica Linton". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Jessica Linton
Senior Biologist/Manager