

#	Comment	Response
NVCA		
1	<p>NVCA ecology staff have reviewed the historic aerial imagery assessment of the wetlands mapped in Figure B (purple circle) and accept the conclusion that the northeast portion contains ambiguous wetland characteristics such as hydric soils but no wetland vegetation. In the absence of hydrophytic plant species, this area is not regulated as a wetland in accordance with O. Reg. 41/24.</p>	<p>Noted.</p>
2	<p>NVCA ecology staff agree with the overall findings of the assessment and characterization of the vegetation communities as presented in Figure 4 of this assessment. That the wetland features were constructed by Ducks Unlimited is not a factor in determining the regulated extent of features; no provision exists in O. Reg. 41/24 or the Conservation Authorities Act to exempt constructed wetland features. The wetland extents in Figure 4 will form the basis of determining the NVCA regulation limit for wetlands within the NVCA-regulated portions of the property.</p>	<p>Noted.</p>
3	<p>Please reconcile the various classifications of wetland/aquatic features identified to clarify NVCA-regulated wetlands within the subject site. Conflicting characterizations of wetland, shallow aquatic and open aquatic are presented within the reporting on Azimuth’s Figure 2, Figure 4 of the Historic Wetland Assessment and Figure 7 of EIS by GEI (Appendix A).</p>	<p>The EIS figure set (Appendix A) has been updated to clarify the wetland classifications. Figure 4 presents the current ELC mapping based on 2024 field surveys. Figure 5 overlays the historical wetland extent (NVCA portions as submitted in Appendix E; GRCA portions interpreted from historical air photos). Figures 8 and 11 now show both current and historical wetland extents, and Figure 12 illustrates and quantifies wetland removals before compensation. Corresponding text revisions have been made in the EIS to clearly distinguish current versus historical conditions.</p> <p>Azimuth’s mapping is included within Appendix E solely as supporting information for the historical wetland delineation</p>

		assessment and is not considered part of the current EIS assessment.
4	Please provide constraints mapping for NVCA-regulated wetlands showing the limits of proposed development (lot fabric, grading), the 30m regulation limit for wetlands and the proposed wetland buffers.	The EIS figure set (Appendix A) has been updated to include the requested constraints mapping. Figure 11 now shows both current and historical wetland extents and their 30 m setbacks/regulation limits overlaid with the Draft Plan and Grading Plan. Figure 12 quantifies wetland setback removals before compensation. Figure 13 shows the proposed compensation plan.
5	A 5-10m wetland buffer is proposed with enhancements to increase functionality. While buffer enhancements are supported given the history of disturbance to these wetland communities, the applicant is advised that NVCA development guidelines specify a 30m buffer from wetlands. The concept plan should be revised to demonstrate conformity with this guideline.	The Draft Plan has been updated to include a 30 m setback to all wetlands, with limited reductions to 15 m in certain locations, as shown in Figures 11 and 12 (Appendix A). As discussed with the NVCA during a meeting on August 20, 2025, where the full 30 m setback cannot be achieved, compensation will be provided through the restoration and enhancement of wetland setback areas. Compensation will also be provided for the prior and proposed removal of wetland setback area, as illustrated in Figures 12 and 13.
6	Should the applicant proceed with the wetland buffers as proposed, conformity with the NVCA's Net Gains for Ecological Offsetting Guideline must be demonstrated. The applicant must provide a wetland offsetting plan which evaluates eligibility of the site for compensation, calculates the area of loss and proposed area of gain, and outlines a strategy for achieving offsetting for the loss of wetland buffer through the proposed development.	The restoration and enhancement strategy has been updated following discussions with the NVCA during a meeting on August 20, 2025. The updated strategy is outlined in Section 8 of the EIS, as well as the corresponding Figure 13 (Appendix A).
7	As shown below from images of Figure 10 and 11 in the EIS, the 15m wetland buffer displayed has encroachment from the proposed lot fabric, reducing the extent of this buffer. The extent of the buffer appears to be closer to 5m where abutting lots 14 and 15. Areas of development encroachment are mapped where the proposed lot fabric overlaps with the natural feature buffers, but this does not appear to be mapped on the west side of the SAS wetland shown below. Please review and revise.	The Draft Plan has been updated to include a 30 m setback to all wetlands, with limited reductions to 15 m in certain locations, as shown in Figures 11 and 12 (Appendix A). As discussed with the NVCA during a meeting on August 20, 2025, where the full 30 m setback cannot be achieved, compensation will be provided through the restoration and enhancement of wetland setback areas. Compensation will also be provided for the prior and proposed removal of wetland setback area, as illustrated in Figures 12 and 13.

<p>8</p>	<p>The development plans appear to utilize the existing paths of disturbance as trails in the proposed development. The formalization and use of this trail in proposed conditions is not discussed in the wetland impact assessment section of the report, which is a gap in the assessment. While trail alignments are generally recognized as compatible and can be supported within wetland buffers, the existing path does not confer sufficient buffer space between the trail and the wetland and cannot be supported. Further, the existing path was not permitted by NVCA and constructed in non-compliance with the regulation. Accordingly, it should be de-commissioned and restored to function as a wetland buffer. The applicant should revise the plans and explore opportunities for their proposed trail within 20-30m of the wetland within the wetland buffer required by NVCA development guidelines as detailed in comment #5 above.</p>	<p>The restoration and enhancement strategy has been updated to include the removal and rehabilitation of all existing trails within the Subject Lands, with those areas restored as vegetated wetland buffers. The updated strategy is outlined in Section 8 of the EIS, as well as the corresponding Figure 13 (Appendix A).</p>
<p>9</p>	<p>Please comment on how the functional servicing preserves the existing wetland catchment area to ensure flows supporting the wetland are matched in post-development conditions.</p>	<p>To mitigate potential impacts to wetland hydrology and water quality, the proposed SWM strategy includes roadside ditches with permanent pools and infiltration trenches to promote infiltration, achieve water balance objectives, and meet water quality standards. Enhanced Protection (Level 1) criteria will be achieved through these measures (80% TSS removal). The design also maintains the pre- and post-development drainage split between the GRCA and NVCA watersheds, ensuring the hydrological balance of the area is preserved.</p> <p>This component will be further evaluated through the forthcoming Wetland Water Balance Risk Evaluation (WWBRE) to be prepared in accordance with the Toronto and Region Conservation Authority's (TRCA) 2017 guidance document, to determine the magnitude of potential hydrological change and to identify whether additional mitigation or monitoring measures are required.</p>

10	<p>The Functional Servicing Report notes all lots created will be serviced through private sewage disposal (septic) systems. The location of proposed septic systems should be documented to be at least 30m from identified wetland features and 0.3m above the high groundwater levels within the NVCA regulation limit. Please provide the locations and elevations of proposed septic systems on lots abutting wetland features.</p>	<p>Septic system locations and elevations will be addressed through detailed design and future architectural submissions, as this subdivision application addresses only lot creation and road infrastructure. All lots except Lots 10, 18, and 19 are set back 30 m from adjacent wetlands. For Lots 10, 18, and 19, Section 7.1.3.1 of the EIS has been updated to note that septic systems should be located at least 30 m from all wetlands. Hydrogeological design requirements, including groundwater clearance, will be confirmed through future detailed design.</p>
RJ Burnside		
3	<p>The EIS notes that discussions with NVCA remain ongoing due to the NVCA Violation Notice for Unauthorized Works associated with the vegetation removal within regulated area. This Violation Notice should be addressed prior to approval of the application as NVCA paused their review of the Terms of Reference due to the violation.</p>	<p>The NVCA Violation Notice remains outstanding, and it is acknowledged that its resolution is required. The NVCA provided comments on the first submission of the EIS, and the proponent and consulting team met with the NVCA on August 20, 2025, to discuss the compensation approach for resolving the violation. The conceptual restoration and enhancement strategy presented in Section 8 of the EIS has been prepared specifically to address the requirements of the Violation Notice. Coordination will continue with the NVCA to finalize the compensation approach so that the Violation Notice can be resolved.</p>
4	<p>The vegetation community mapping prepared by Azimuth in 2018, which forms part of Appendix D, shows additional wetland communities that are not discussed in the current EIS or Appendix D report, namely the MAM2-10 meadow marsh in the central portion of the property. Furthermore, in 2018, NVCA identified a wetland and staked its boundaries in the northeastern corner of the property. The current EIS states that this area is not a wetland. The application should not proceed until NVCA confirms whether their original assessment was inaccurate or if they are satisfied that there is no longer a wetland in the northeast corner of the property.</p>	<p>NVCA reviewed and addressed this matter in their comment response letter dated June 5, 2025. In their Comments 1 and 2, NVCA ecology staff confirm acceptance of the historical wetland assessment (copy provided in Appendix E) for the northeast portion of the property and conclude that this area does not meet the definition of a regulated wetland under O. Reg. 41/24.</p> <p>The NVCA also notes that the historical wetland extent outlined in Appendix E, now also incorporated into the main EIS figures in Appendix A, should be included in the assessment of wetland and setback removals for determining compensation. Please refer to Figures 5, 8, and 11–13.</p>

		Corresponding text revisions have been made in the EIS.
5	We understand that GRCA is aware of wetland removal within their jurisdiction's Regulated Area. Please confirm if an additional violation order is pending or if any requirements have been outlined by GRCA.	The EIS has been updated to address this matter in Section 4.5.4. The GRCA issued a Violation Notice on August 30, 2024, for unauthorized wetland removal. To resolve the matter, the GRCA required a permit application and a supporting letter demonstrating consistency with applicable GRCA policies. The proponent submitted the permit application, and GEI prepared the required supporting letter (copy provided in Appendix D). The GRCA subsequently issued a permit on May 28, 2025, resolving the violation with no further actions pending.
6	In addition to the recent wetland removal, it appears as though trails have been also recently constructed along the wetland, and woodland edges. We understand that these trails will be restored to a natural condition. A detailed restoration plan is required.	<p>The restoration and enhancement strategy has been updated to include the removal and rehabilitation of all existing trails within the Subject Lands, with those areas restored as vegetated wetland buffers. The updated strategy is outlined in Section 8 of the EIS, as well as the corresponding Figure 13 (Appendix A).</p> <p>A conceptual restoration and enhancement strategy is provided in Section 8, for review and discussion. Once there is agreement on the overall approach, GEI will prepare a design brief that includes detailed planting and grading specifications, species selection, habitat structure design, soil preparation, implementation guidance, and a monitoring and adaptive management plan.</p>
7	All lot boundaries, grading and roads should be kept outside of all natural feature setbacks. Lot boundaries should be adjusted to remain outside of setbacks. A grading plan should be provided to demonstrate that no grading will occur within natural feature setbacks.	The Draft Plan has been updated to include a 30 m setback to all wetlands, with limited reductions to 15 m in certain locations, as shown in Figures 11 and 12 (Appendix A). As discussed with the NVCA during a meeting on August 20, 2025, where the full 30 m setback cannot be achieved, compensation will be provided through the restoration and enhancement of wetland setback areas. Compensation will also be provided for the prior and proposed removal of wetland setback area, as illustrated in Figures 12 and 13.

		<p>Some limited grading associated with road construction is proposed within the outer portions of certain wetland setbacks. These setback areas are already disturbed and subject to compensation, and implementation of the restoration and enhancement plan will also require grading within the NHS block. Appropriate ESC measures will be in place prior to any grading activities, and all graded areas will be restored and naturalized with native vegetation.</p>
8	<p>To aid in review of Figure 12: Potential Restoration and Enhancement Areas, please provide mapping to depict all currently and previously existing wetlands, woodlands and their associated setbacks. Identify which features and which setbacks have been disturbed or removed. Detailed restoration plans must be provided for all natural features and associated setbacks where removal or disturbance has occurred. We understand that wetland removals in the NVCA are being addressed through a violation order. We note that NVCA's current mandate addresses the hydrologic function of wetlands only, while the municipality is responsible for the ecological function of wetlands. As such, any restoration plans prepared as part of the violation should also be reviewed and approved by the County.</p>	<p>The updated restoration and enhancement strategy is outlined in Section 8 of the EIS, as well as the corresponding Figure 13 (Appendix A).</p> <p>Once there is agreement on the overall approach, GEI will prepare a design brief that includes detailed planting and grading specifications, species selection, habitat structure design, soil preparation, implementation guidance, and a monitoring and adaptive management plan.</p> <p>The detailed restoration design brief will be circulated to the County for review and approval along with the other reviewing authorities.</p>
9	<p>Please clarify how Lot 6 will be accessed. Is Block 29 proposed to be a municipal road? It is unclear why the road ends at the property boundary. Will a cul-de-sac be constructed here? Please confirm if additional disturbance will occur within the wetland setback if a cul-de-sac is required.</p>	<p>The updated Draft Plan includes major revisions to the lot and road layout, including removal of the cul-de-sac. The EIS figure set (Appendix A) has been updated to clarify wetland and wetland setback disturbances. Figure 12 quantifies wetland and wetland setback removals before compensation. Figure 13 shows the proposed compensation plan.</p>

10	Significant grading is proposed across the site. There is potential for hydrologic changes which could impact wetlands. The EIS notes that a wetland water balance risk evaluation, using TRCA's 2017 guidelines, will be carried out. The water balance and risk analysis should be submitted and reviewed prior to approval of the application.	A Wetland Water Balance Risk Evaluation (WWBRE) in accordance with the Toronto and Region Conservation Authority's (TRCA) 2017 guidance document will be completed for the retained wetlands and submitted under separate cover.
----	---	--