

June 8, 2020

Kirby Dier Network and Microgrid Policy 77 Grenville Street, 6<sup>th</sup> Floor Toronto, ON M7A 2C1

RE: Response to Environmental Registry of Ontario Posting 019-1503: Proposal to Identify and protect a corridor of land for future electricity infrastructure in the Greater Toronto Area

Thank you for providing the City of Vaughan (City) the opportunity to comment on Province's March 23, 2020 Environmental Registry of Ontario (ERO) posting seeking comments on the proposed narrowed study area and the guiding principles outlined in the posting. City staff have an interest in the development of this corridor that traverses through northwest Vaughan and specifically related to the City's Natural Heritage Network and our communities. Please note that these are City staff comments and not official Council position.

This EBO posting poses two questions:

- 1. Are you aware of potential barriers or issues that may be associated with the proposed narrowed area of interest?
- 2. Are there other principles we should consider in conducting the study?

The proposed narrowed area of interest contains parts of six concession blocks in the City. The lands are primarily within the City's non-urban area which contain prime agricultural and natural heritage lands. The area of interest also includes lands within the City's urban area containing the North Kleinburg-Nashville and West Vaughan Employment Lands Secondary Plan Areas. Provided below are high-level comments pertaining to each question from the posting. Additional details for select comments can be found within Appendix I.

# Question 1: Are you aware of potential barriers or issues that may be associated with the proposed narrowed area of interest?

#### Natural Heritage System:

1. The narrowed area of interest is located within the Humber River Watershed. Notable natural features include the main branch of the Humber River and East Humber River, several coldwater tributaries, Provincially Significant Wetlands (PSWs) and significant woodlands. In accordance with the Vaughan Official Plan (VOP) 2010, valley and stream corridors, wetlands and woodlands are considered to be protected "Core Features" of the City's Natural Heritage Network (NHN). Minimizing the impacts to "Core Features" by selecting the least intrusive transmission corridor alignment should be a priority; and building-in comprehensive mitigation measures will be essential to protect the function of these important features. A



- more detailed overview of environmental constraints impacting the narrowed area of interest is provided within Appendix I.
- 2. Several features within the narrowed area of interest are considered to be habitat and/or contributing habitat for Species at Risk (SAR). Consultation with the Ministry of Environment, Conservation and Parks (MECP) will be key to identify and appropriate alignment for the corridor as well as any required mitigation measures.

#### Prime Agricultural Lands:

3. A large portion of the narrowed area of interest is located within the Greenbelt Plan Area and contains prime agricultural lands. The proposed alignment will significantly fragment these remaining agricultural lands in Vaughan. A comprehensive Agricultural Impact Study (AIA) should be conducted to understand impacts (e.g. interface, fragmentation) on agricultural lands as well as to assist in developing appropriate mitigation measures.

#### Parkland:

4. The proposed narrowed area of interest appears to impact existing assets and sport fields located at 6950 Nashville Road that provide residents and local sport groups access to permitted fields. Any potential limitations imposed on the use of the fields due to transmission corridor final alignment will adversely impact the City's access and inventory of available fields and City-wide level of service.

#### Future Development Areas and Existing Communities:

5. The narrowed area of interest crosses through lands within the North Kleinburg-Nashville Secondary Plan and West Vaughan Employment Lands Secondary Plan. Further, the area of interest also impacts a proposed community in Block 55 (Copper Creek) and abuts existing communities in Block 62. Impacts on the developable land base and existing communities in these areas must be minimized to the greatest extent possible. Additional details are provided in Appendix I.

### Question 2: Are there other principles we should consider in conducting the study?

- 1. Minimizing impacts to the natural heritage system has been identified as a key guiding principle. However, an emphasis should be placed on <u>avoidance</u> of significant natural features to the greatest extent possible. In instances where avoidance is not feasible, it will be important to identify any comprehensive mitigation measures required to protect the form and/or function of significant natural features as part of demonstrating impact minimization.
- 2. It is understood that this project is intended to follow a similar alignment as the GTA West Corridor. Co-locating the proposed corridor with other linear infrastructure (i.e. the GTA West Transportation Corridor in particular) will be important for minimizing land consumption and impacts on natural features. Please note that Vaughan Council has endorsed the northernmost route option for the GTA West Transportation Corridor (see Committee of the Whole report of November 12, 2019,

https://pub-vaughan.escribemeetings.com/filestream.ashx?DocumentId=23698).



- 3. Given the extent of impacted lands, stakeholder engagement and consultation, particularly with the farming and Indigenous Communities should be considered as a guiding principle.
- 4. Utility corridors represent an opportunity to create linear urban green spaces and recreational trail networks across the City to meet the recommendations of our City-wide trail strategies by connecting to adjacent municipal trail networks within the City of Brampton, Town of Caledon and King Township; by inter-connecting neighbourhoods and community destinations; and, to meet the Council Strategic priority in advancing the development of the City's Vaughan Super Trail. Recreational trail connections within hydro utility corridors also create an opportunity to advance the integration of a multi-modal transportation system by providing alternative, non-vehicular modes of transportation by connecting neighbourhood and regions of the City of Vaughan. Additional details regarding guiding principles and technical considerations can be found within Appendix I.
- 5. The Ministry of Environment, Conservation and Parks requires that climate change impacts be incorporated in environmental assessments. A focus should be placed on reducing carbon footprint through all phases of the project lifecycle. The design, construction and operation of the project through the lens of long-term asset management should be evaluated. For instance, the potential impacts to the NHN (significant woodlands) should be considered as a loss and mitigation measures should be identified to offset this loss.

Should you have any questions regarding this submission, please contact Ms. Ruth Rendon, Senior Environmental Planner, at (905) 832-8585 ext. 8104 or ruth.rendon@vaughan.ca.

Respectfully submitted,

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# **Appendix I – Additional Detailed Comments**

Question/Category	Comment
Question 1 - Natural Heritage System	Provided below is a detailed overview of environmental constraints impacting the narrowed area of interest:  Block 56:  • A large valley corridor associated with the East Humber River traverses the middle of this block. The valley contains significant woodlands and is considered to be an Environmentally Significant Area (ESA). An emphasis should be placed on finding a suitable crossing location which minimizes impacts on the feature.  • The southwest portion of the block also contains multiple PSWs associated with the East Humber River Wetland Complex and identified Significant Wildlife Habitat (SWH). These sensitive features should be avoided to the greatest extent possible.  Block 62 and 63:  • The western/central portion of these blocks are traversed by the main tributary of the Humber River and form part of the Nashville Conservation Reserve. The valley contains significant woodlands and wetlands. An emphasis should be placed on finding a suitable crossing location which minimizes impacts on the feature.  Block 66 and 67:  • The northern portion of Block 67 contains a PSW feature associated with the Tormore Wetland Complex and a woodland. These features should be avoided to the greatest extent possible.  • The southern portion of Block 67 and central portion of Block 66 contain habitat for threated grassland species, including Bobolink and Eastern Meadowlark.



# Question 1 – Future Development Areas and Existing Communities

Provided below is are detailed comments pertaining to impacted lands within development areas and existing communities:

## North Kleinburg-Nashville Secondary Plan:

• The narrowed area of interest goes through the Huntington Road Community focus area 2 of the North Kleinburg-Nashville Secondary Plan. Low Rise Residential development is planned for this area. Should these lands be lost to the transmission corridor, the residential units provided therein will have to be accommodated elsewhere within the City to fulfill the 2031 population allocation. Further, the presence of the corridor in this area may limit the land use options available to the City, in that it makes it less desirable for residential development. Impacts on this development area must be assessed and minimized to the greatest extent possible.

### West Vaughan Employment Lands Secondary Plan:

• The narrowed area of interest impacts prestige employment and general employment lands within the West Vaughan Employment Lands Secondary Plan area. A corridor alignment (including access opportunities and preservation of the land base) that maximize employment lands uses including industrial, warehousing and manufacturing with limited ancillary retail and/or office within the area should be considered a priority. For example, given existing and proposed infrastructure in the northern portion of the plan area, the transmission corridor has the potential to cause isolated/irregular parcels of development land. The access to and usability of the remnant parcels and impacts on desirability of the area will need to be considered carefully.

# Block 55 (Copper Creek) Development:

 A portion of the narrowed area of interest traverses the north-west corner of Block 55. An Official Plan Amendment (OP.17.007) which proposes residential uses was submitted for this area in 2017. Impacts to this proposed development should be considered when determining the ultimate location of the transmission corridor.



	Block 62 Existing Communities:  • The narrowed area of interest directly abuts two existing communities in Block 62:  • Mizuno Crescent and Richard Lovat Court (south-west corner of the block);  • Secret Garden Court, Mary Natasha Court and Endless Circle (north-east corner of the block).  Given the proximity of these communities to the corridor, impacts must be assessed and minimized.  Also, refer to GTA West Transportation Corridor Route Planning and Environmental Assessment Study Resumption staff report dated Tuesday, November 12, 2019 provide detailed comments on the impacts to Future Development Areas and Existing Communities within the narrowed area of interest.
Question 2 – Trail Connections	The City of Vaughan's approved 2019 Pedestrian and Bicycle Master Plan identifies the location of off-road, multi-use recreational pathways typically within parks and open spaces, primarily serving recreational users. In particular, the Vaughan Super Trail was identified as a key priority for a City-wide multi-use recreational trail network. This initiative to create a world-class, identifiable City-wide trail loop connects a variety of major destinations, green spaces and right-of-way pedestrian and bicycling infrastructure leveraging existing utility corridors including Hydro Transmission Corridor. Furthermore, the Pedestrian and Bicycle Master plan includes the development of pathways along valley lands, river corridors, and active or abandoned rail lines, hydro corridors and other linear routes that serve the needs of both recreational and utilitarian pedestrians and cyclists.



Recreational trail alignments within utility corridors can be accomplished
through the development of trail crossings within creeks and valley systems,
road and highway underpasses, accessible and environmental experiences,
increasing the naturalized and greenspaces and providing for ecological
diversity along corridors. Design parameters will be based on municipal
standards for minimum clearances, widths, materials, grading and construction
methods while recognizing the corridor function as utility infrastructure.