

March 11, 2024

Ms. Mackenzie Ceci, MSc Pl, MCIP, RPP
Senior Planner (Current Development)
City of Niagara Falls
Niagara Falls, Ontario
L2E 6X5

Ms. Cara Lampman
Manager Environmental Planning
Regional Municipality of Niagara
1815 Sir Isaac Brock Way
Thorold, ON
L2V 4T7

Ms. Sarah Mastroianni
Manager, Planning and Permits
Niagara Peninsula Conservation Authority
250 Thorold Road West, 3rd Floor
Welland, ON
L3C 3W2

Dear Mss. Ceci, Lampman and Mastroianni,

RE: **Potential Habitat Creation Works – GR (CAN) Investment Co. Ltd. Property, City of Niagara Falls**

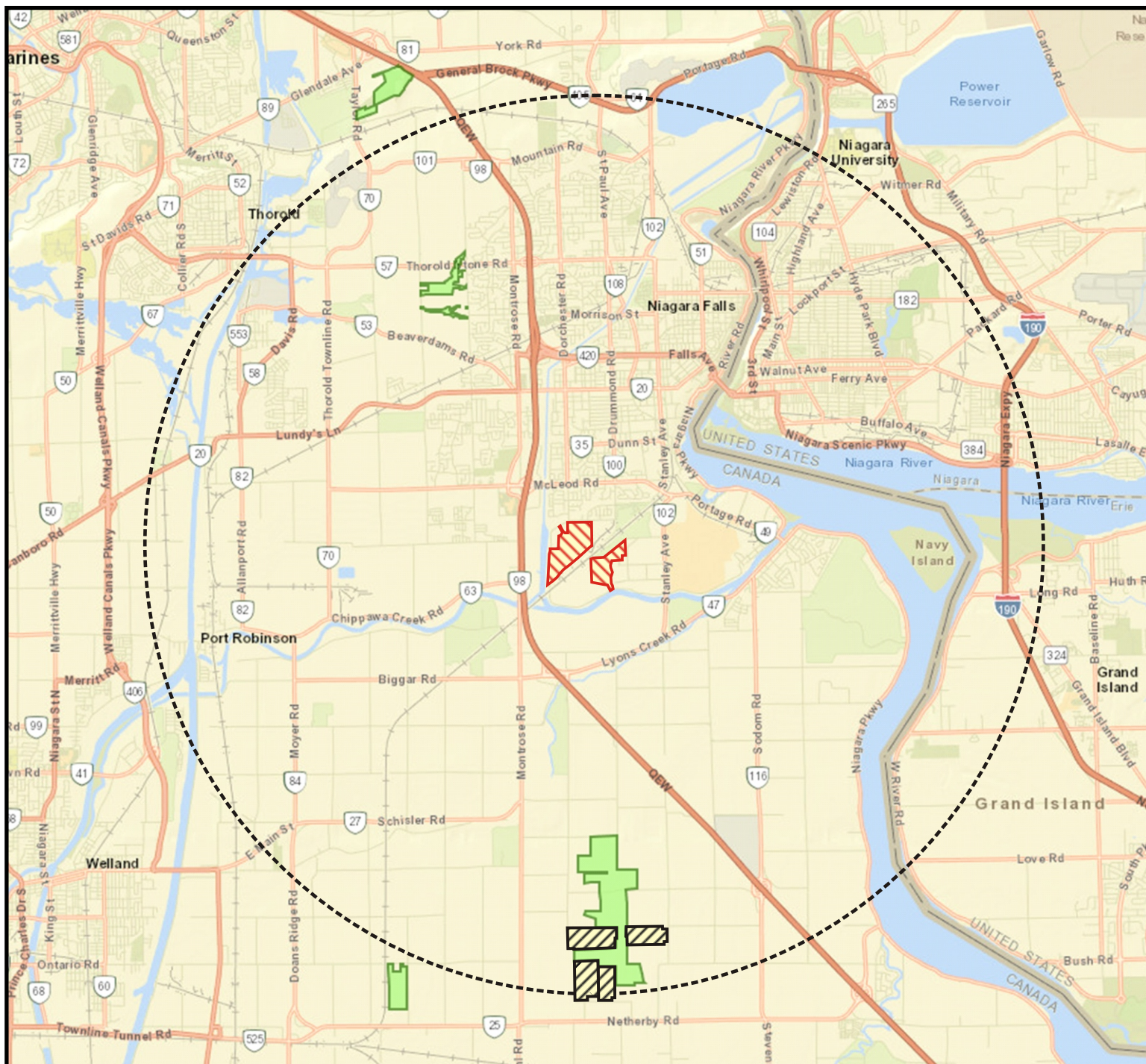
This letter has been prepared to introduce conceptual locations for habitat creation works in the City of Niagara Falls, which may be considered as part of habitat compensation related to future development on lands owned by GR (Can) Investment Co. Limited. This letter will provide a brief description of lands being considered for development, as well as discuss potential habitat creations intended to provide an overall benefit to the Regional Natural Heritage System.

BACKGROUND

The intention of this letter is to introduce potential areas and concepts for habitat creation works, which are to be considered as part of habitat offsetting associated with development on lands owned by GR (Can) Investment Co. Limited. As you are likely aware, GR (Can) is in the process of finalizing submissions for future development on lands which have been termed the Commercial Core and Industrial Lands. The approximate locations of these lands are illustrated in Figure 1 and further discussion regarding each area is provided below.

Commercial Core

Lands being considered for development as part of the Commercial Core are generally located on the west side of the Subject Lands, north of the Con Rail Drain. Lands meeting the Region's definition of Other Woodland in this area include a small (<0.5 ha) Fresh-Moist Willow Lowland Deciduous Forest Type (FOD7-3), as well as culturally influenced Savannah and Woodland communities. This FOD unit is a young



Legend



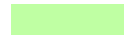
Subject Lands



10km Arc from Subject Lands



Location of Potential Properties for Habitat Creation



NPCA Properties

Figure 1
Location of Subject Lands and Potential
Lands to be Used for Habitat Creation

GR (CAN) Investment Co. Ltd.
Niagara Falls Lands

Prepared for: **GR (CAN) Investment Co. Ltd.**

Prepared by: **COLVILLE**
CONSULTING INC.

March 2024

File: C15082

to mid-aged community, with Large-Toothed Aspen and Hybrid Crack Willow dominating the canopy. The moderately dense understory is dominated by European Buckthorn.

The Cultural Woodland community has moderate canopy cover of occasional Pin Oak, White Elm and Green Ash and dense understory vegetation with abundant European Buckthorn. The Cultural Savannah community has moderate cover of several hawthorn species in the shrub layer. None of these features were identified as containing significant wildlife habitats.

Several small wetlands less than 0.5 ha in size are also present in this area and include a mix of Silky Dogwood Mineral Thicket Swamp Type (SWT2-8), Rice-Cutgrass Mineral Shallow Marsh Type (MAS2-8), and White Elm Mineral Deciduous Swamp Type (SWD4-2). European Buckthorn is present within all communities, excepting the MAS. Each of these communities contains standing water throughout the year to varying degrees. None of the communities were identified as containing significant wildlife habitats.

Industrial Lands

Lands to be included as part of the Industrial Lands are located on the east side of the Subject Property, near the current terminus of Progress Street. Areas meeting the Region's definition of Other Woodland that are proposed for removal include culturally influenced Savannah and Woodland communities. The Cultural Woodland community is mid-aged, with moderate canopy cover of Red Oak, White Ash and White Elm. European Buckthorn is abundant in the understory. The Cultural Savannah community has moderate cover of several hawthorn species in the shrub layer. Two small vernal pools within the cultural savannah community met criteria for SWH for amphibian breeding habitat.

A small removal of wetland is proposed from the access connection to the Riverfront Residential lands to the south. This access will cross a small portion of deciduous swamp that was noted as disturbed with some standing water. The canopy was largely dead Ash trees, with the understory dominated by European Buckthorn. The portion of the wetland proposed for removal did not meet criteria to be considered significant wildlife habitat.

HABITAT OFFSETTING WORKS

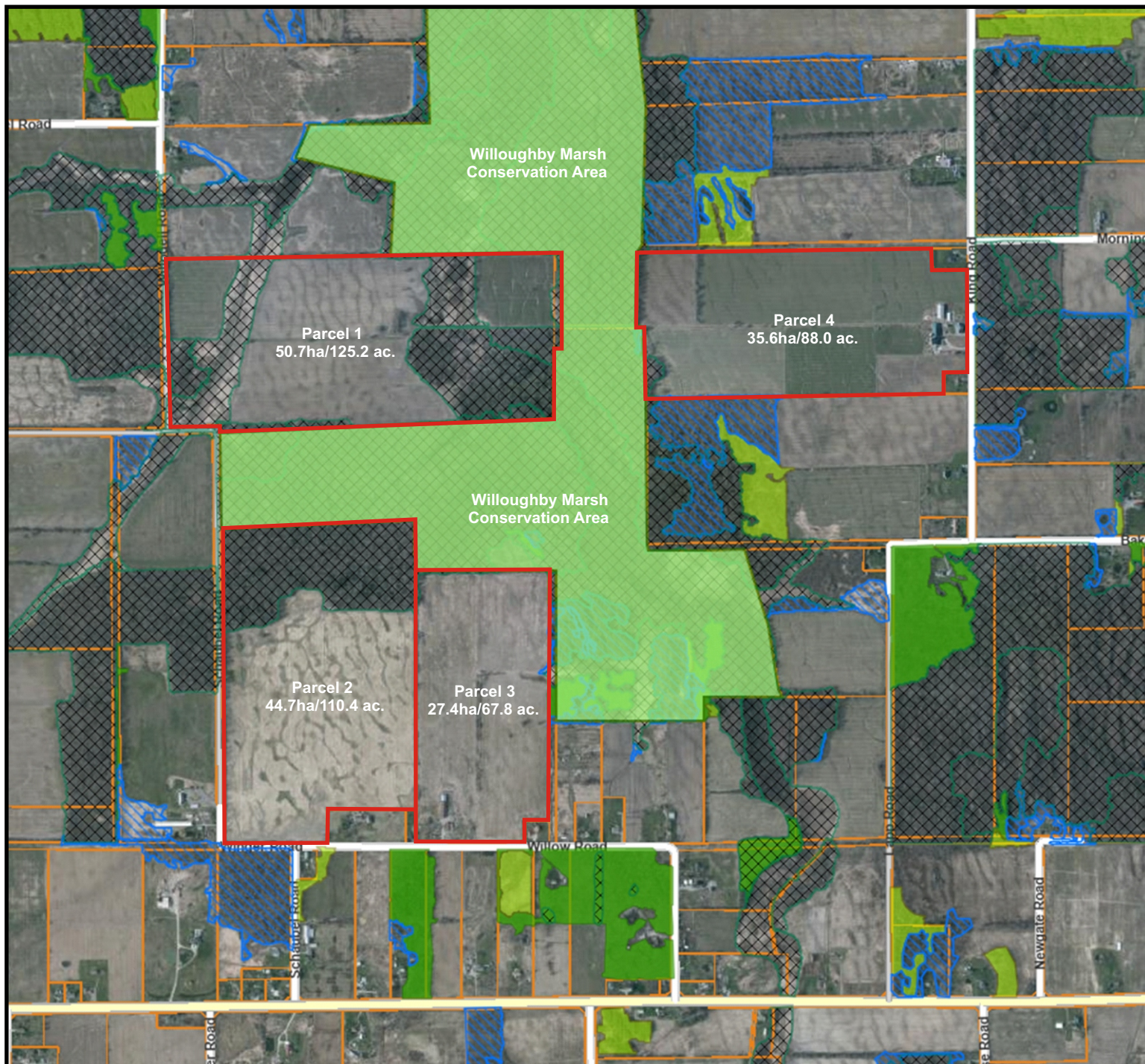
The primary intent of this letter is to introduce conceptual locations for habitat offsetting works. To assist with selecting potential offsetting locations, we screened several properties within 10km of the GR (Can) lands for the following parameters:

- Proximity to existing natural heritage features and areas
- Current land use, condition and agricultural potential
- Potential for successful creation of woodland and wetlands
- Overall potential benefits to the Regional Natural Heritage System (NHS), and
- Scalability of habitat creation works.

Through our assessment, we identified four candidate properties located in the south end of Niagara Falls. The locations of these properties are illustrated in Figure 2 and described below. For references purposes, these properties have been assigned the identifiers of Parcels 1-4.

Parcel 1

Parcel 1 is located east of Willodell Road and north of Schneider Road. This parcel measures approximately 50.7ha (125.2 acres) in size, with approximately 30.7ha (75.9 acres) of land currently in agricultural production (soybeans and hay in 2023) and approximately 20ha (49.4 acres) consisting of wetland and woodland.



Legend

- Subject Parcels
- Provincially Significant Wetlands
- Other Wetlands
- Significant Woodlands
- Other Woodlands

Figure 2
Potential Lands to be Considered for
for Habitat Creation

GR (CAN) Investment Co. Ltd.
Niagara Falls Lands

Prepared for: **GR (CAN) Investment Co. Ltd.**

Prepared by: **COLVILLE** 
CONSULTING INC.

March 2024

File: C15082

This parcel was selected as a potential candidate for habitat creation due to proximity to Willoughby Marsh Conservation Area and the woodland and wetlands on the property. Creating additional woodland and wetland on the eastern portion of this property would complement current natural areas adjacent to the property.

The landowner has also previously partnered with Ducks Unlimited Canada to create small ponds on the property to assist with waterfowl breeding.

Parcel 2

Parcel 2 is located east of Schaubel Road and north of Winger Road. This parcel measures approximately 44.7ha (110.4 acres) in size, with approximately 32ha (79 acres) of land currently in agricultural production (soybeans in 2023) and approximately 12.7ha (31.4 acres) consisting of wetland and woodland.

Similar to Parcel 1, this parcel was selected as a potential candidate for habitat creation due to proximity to Willoughby Marsh Conservation Area and the woodland and wetlands on the north end of the property.

The remnant slough patterning on the property also provides opportunities for re-creating the former slough forest community that would have existed on the property prior to agricultural use.

Parcel 3

Parcel 3 is located north of Willow Road and has been assigned the address of 6409 Willow Road. This parcel is the smallest of the four candidate properties considered, measuring approximately 27.4ha (67.8 acres) in size. Most of the property is currently in agricultural production (soybeans in 2023), with a small drainage feature occurring on the northern and eastern portion of the property.

Parcel 3 was selected as a potential candidate for habitat creation due to proximity to Willoughby Marsh Conservation Area and associated woodland and wetlands. The drainage ditch on the property also provides the hydrological potential for creating wetlands on portions of the property.

Parcel 4

Parcel 4 is located west of King Road and south of Morningstar Road and has been assigned the address of 13885 King Road. This parcel measures approximately 35.6ha (88 acres) in size, with approximately 35.2ha (87 acres) of land currently in agricultural production (soybeans in 2023) and approximately 0.4ha (1 acre) consisting of wetland and woodland.

This parcel was selected as a potential candidate for habitat creation due to proximity to Willoughby Marsh Conservation Area, as well as the opportunity to create more contiguous woodland and wetland in the area.

DISCUSSION

It is our understanding that woodlands and wetlands in the Commercial Core and Industrial Area of the GR (Can) properties will potentially be affected by future development on those parcels. It is understood that Environmental Impact Studies (EIS) are currently being prepared by GEI Consultants to assess potential impacts associated with proposed development on these lands, and therefore this letter is intended to be read in conjunction with those EIS's.

As described above, the woodland and wetland communities in the Commercial Core and Industrial Area are generally early-successional to mid-aged, with much of these communities regenerating on lands that were affected by previously agricultural uses. Assessments of these areas indicate that, except for two small vernal pools in the Industrial Area, these communities are not providing significant habitat functions. Much of these woodland and wetland areas are also highly impacted by European Buckthorn, which is likely limiting colonization by native trees and shrubs.

Through inventories and analyses conducted as part of the various EIS's completed for the Riverfront Residential, Commercial Core and Industrial Areas, it has been determined that natural areas in the vicinity of the GR (Can) properties are generally functionally isolated from the Regional NHS. This isolation is primarily related to barriers associated with the Welland River to the south, the hydro canal to the west and existing urban land uses to the east and north. Because of this isolation from the Regional NHS, it was determined that habitat enhancements and creation on the property would likely have limited benefit to the Regional NHS and off-site opportunities for habitat creation should be assessed and considered.

As described above, the four parcels considered for offsetting in this analysis are located adjacent to Willoughby Marsh Conservation Area and closely associated woodlands and wetlands, which collectively create one of the largest natural areas in the Region. Habitat creation in this area provides opportunities to enlarge and enhance current natural areas on and adjacent to these parcels, as well as provide functional benefits to the Regional NHS beyond what could be realized by habitat creation works on the GR (Can) properties.

The candidate parcels have also been selected for their scalability. It is understood that the total area of woodland and wetland being considered for offsetting has yet to be finalized, however these parcels provide opportunities to create woodland and wetland far in excess of what may be impacted on the GR (Can) properties, providing for the potential for an overall net gain in habitat area, ecological functions and canopy cover, which is aligned with objectives of current and contemplated provincial programs.

I trust this letter will be of assistance in understanding the concept and rationale related to off-site habitat creation. Please do not hesitate to contact the undersigned should you have any questions regarding this letter.

Respectively submitted by:



Ian Barrett, M.Sc.
Colville Consulting Inc.