

ATTACHMENT C: Environment Referral Comments

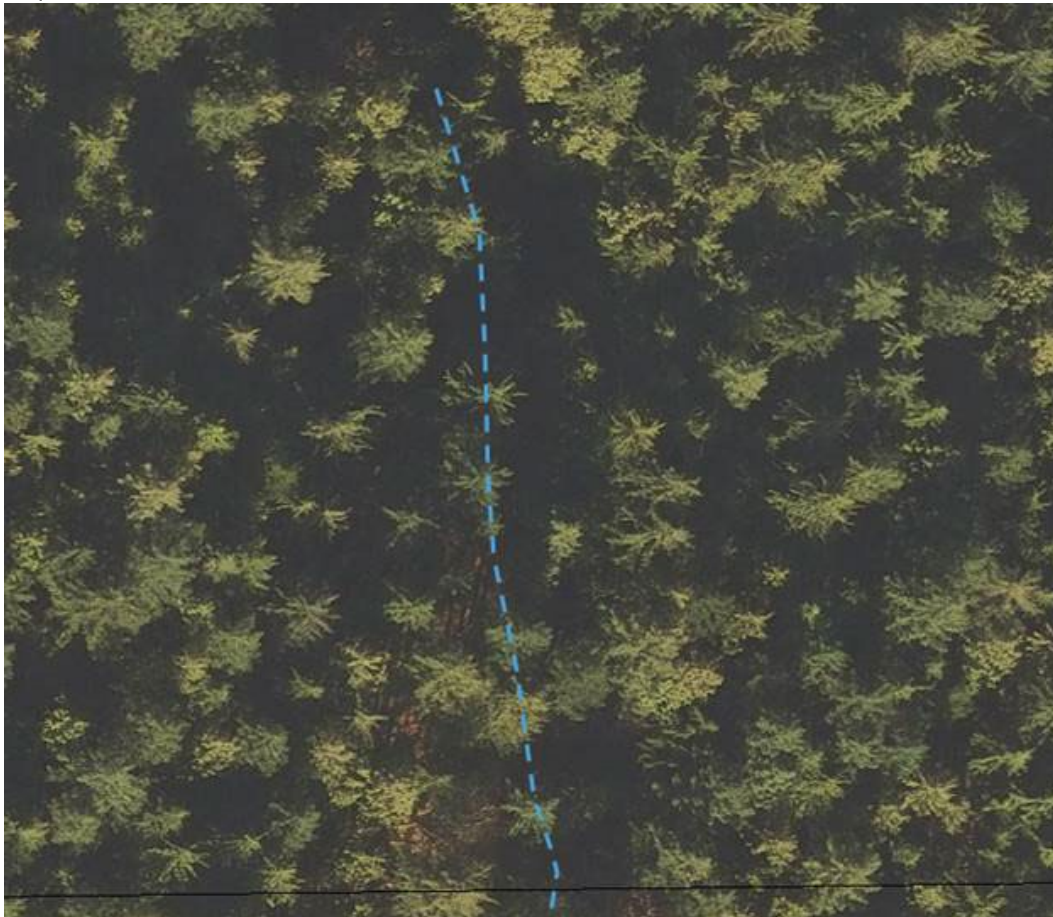
A RAPR Assessment Report was prepared by Redcedar Environmental Consulting (REC) dated January 24, 2023. It does not appear that it has been submitted to the provincial notification system to date. The report states the following:

Portions of the Riparian Assessment Area (RAA) outside of the SPEA described in this report were cleared between July 2018 and June 2019. No development has occurred on the site since that time. Those areas were recently observed to be naturally revegetating.

Based on aerial imagery and a site visit which was conducted on March 6, 2023, it appears that clearing had occurred within the SPEA of the wetland. The report further states that:

Riparian vegetation around this feature had been disturbed during land clearing activities, but there was no evidence of direct permanent impacts to the channel. Review of aerial imagery appeared to show excavator tracks crossing the wetland, suggesting there were potentially temporary impacts during land clearing works.

Tree removal appears to have occurred within the SPEA; however, this is not clearly indicated in this report. As this assessment is retroactive, it is likely that a Condition and Impact Assessment will be required.



2017

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2021



March 6, 2023 (Stumps were visible within the 15 m SPEA)

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An Arborist Report was prepared by REC dated November 10, 2022. The report indicates that the site was largely cleared of trees in 2017; however, this is only true of 11533 Wilson Street. The southern lot, 11511 Wilson Street, was still forested as of July 2018 (referring to Google Earth). Internally, it has been well documented that 11511 Wilson Street was to be included as part of this development application (prior to the tree clearing). The Bylaw Department received a complaint about tree clearing at 11511 Wilson Street in March 2019 and the owner was notified of the potential implications with respect to LAN.32 (which were summarized in a letter). Therefore, there is documented evidence that tree removal had occurred prior to the submission of a development application and prior to approval of a Tree Retention/Replanting Plan. As such, the proponent is subject to a penalty and must replace all significant trees at a 3:1 ratio at 11511 Wilson Street.

The report indicates that a total of 4,335 trees would need to be replanted under LAN.32 (this considers both lots); however, only 21 trees are recommended for replanting. The report rationalizes that the site has remained fallow and that natural regeneration has occurred. Although many viable native conifer saplings were observed during the March 2023 visit, many invasive plants were colonizing the site and dense stands of alder were beginning to form, threatening the health of the successive forest. In addition, LAN.32 does not credit for regeneration nor should there be any incentive for complete disregard of policy.



March 6, 2023 (Representative saplings regenerating at 11511 Wilson Street)