

April 25, 2024

BEL 217069

Tim Jessop
Vice President, Developments
Montcrest Capital Management
400 1131A Leslie Street
Toronto, ON M3C 3L8

**Re: Environmental Impact Study Addendum – 51 & 57 Tannery Street and 208 Emby Drive,
City of Mississauga**

Dear Mr. Jessop:

Beacon Environmental Limited (Beacon) was retained in 2017 by NYX Tannery LP to prepare an Environmental Impact Study (EIS) in support of a proposed re-development of three adjoining properties located at 51 and 57 Tannery Street and 208 Emby Drive in the City of Mississauga (**Figure 1**). At the time, the proposed development was to construct townhouses.

The EIS was originally submitted in June 2018, and a resubmission of the EIS was made in June 2019 to the City of Mississauga and Credit Valley Conservation Authority (CVC) as part of previous applications to amend the City's Official Plan and Zoning By-law. A Reliance Letter was submitted in July 2020 in lieu of a full EIS resubmission, which addressed a proposed change to the development limit. The previous applications were approved and the Official Plan and Zoning By-law were amended to permit the proposed townhouse development.

The purpose of this EIS Addendum is to provide confirmation that the findings, recommendations, and conclusions outlined in Beacon's previously submitted EIS reports remain applicable to the currently proposed Site Plan. An EIS Addendum was requested by CVC to confirm that the previous EIS assessment and recommendations still apply and include updates, as necessary, to reflect the new Site Plan.

Natural Heritage and Hydrological Features

A watercourse, known as Mullet Creek, traverses the south side of the subject property (**Figure 2**), which has been identified as Type 2 warmwater fish habitat.

Vegetation communities associated with the subject property are illustrated in **Figure 2**. A Cultural Woodland (CUW) (ELC Unit 1) is located along the valley slope adjacent to Mullet Creek. The canopy is dominated by mid-aged Manitoba Maple (*Acer negundo*), with some Black Walnut (*Juglans nigra*), Hybrid Crack Willow (*Salix X rubens*), and Green Ash (*Fraxinus pennsylvanica*). The Green Ash component of the canopy is dead or dying. This woodland community is extremely disturbed and has been heavily altered by encroachment from surrounding industrial development, notably fill and waste dumping.

The EIS (Beacon 2019) determined that the tableland of the subject property supports existing development including a detached dwelling with associated lawn/parking and industrial lands. The industrial buildings were demolished in 2023. Tablelands vegetation consists of planted ornamentals and ruderal species typical of disturbed areas and a broken hedgerow comprised of Manitoba Maple, with some Black Walnut, apple and hawthorns (ELC Unit 2).

The EIS (Beacon 2019) confirmed that the Mullet Creek valleyland qualifies as a significant valleyland based on the definition from the City of Mississauga Official Plan. The valleyland is also recognized as a Significant Natural Area in the City of Mississauga. However, the EIS determined that the Cultural Woodland (CUW1) associated with the Mullet Creek valleyland does not meet the Mississauga Official Plan definition of "Woodland" as it is less than 40 m wide and, thus, cannot be considered a Significant Woodland. No natural heritage features are associated with the tableland of the subject property.

With respect to habitat of threatened or endangered species, in 2017, Beacon confirmed with the Ministry of Natural Resources and Forestry (MNR) that surveys for endangered bats were not required for this site. The EIS also cited 2018 guidance from MNR that cultural treed features (e.g., cultural woodlands) were not considered habitat for endangered Little Brown Myotis and Northern Myotis. Based on this guidance, the cultural woodland on the property associated with Mullet Creek was not previously considered habitat for endangered bats. However, more recent guidance from the Ministry of the Environment, Conservation, and Parks (MECP) suggests that cultural woodlands are not necessarily excluded from consideration for bat maternity roost habitat. Based on this more recent guidance, the cultural woodland along Mullet Creek would represent potential habitat for endangered bats; however, surveys to confirm presence/absence of maternity roosting for endangered bats, including acoustic monitoring, have not been conducted for the property as these surveys are typically only required when direct impacts on woodland habitat (e.g. tree removals) are expected.

Natural Hazards

Natural hazards associated with the subject property identified in the EIS include the floodplain and valley slope of Mullet Creek. Natural hazard limits are illustrated in **Figure 3**.

The regional floodline is confined to the valley and does not extend onto the tableland. The physical top of slope along the Mullet Creek valleyland was staked by CVC on July 12, 2017. Patriot Engineering Ltd. (2019) prepared a *Geotechnical Investigation for Performing Slope Stability Analysis* to determine the position of the Long Term Stable Top of Slope (LTSTOS) relative to the physical top of slope. The study determined that, for the majority of the site, the LTSTOS is coincident with the physical top of slope.

Summary of Natural Heritage and Hazard Constraints

Natural heritage and hazard constraints identified within the subject property include the following:

- Mullet Creek – Warmwater Fish Habitat;
- Significant Valleyland as defined by top of bank of Mullet Creek staked by CVC on July 12, 2017);
- LTSTOS (Patriot Engineering 2019);
- Floodplain; and

- Potential maternity roost habitat for endangered bats (Cultural Woodland associated with Mullet Creek valley).

A 7.0 m setback was originally applied to the LTSTOS, which defined the development limit (Beacon 2019). However, in their comments of November 2019, CVC staff requested that the proposed limit of development adjacent to the Mullet Creek valleyland be regularized to create a more uniform interface between the natural heritage system and the proposed development. The proposed regularized development limit, which involved adjustments to the LTSTOS setback, is illustrated in **Figure 3**. The revised LTSTOS, with setbacks varying in width from 3.5 m to 10 m, with an overall net gain of 4.36 m², was accepted by the City and CVC and is reflected in the approved plans and amended by-laws. The currently proposed Site Plan prepared by SRM Architects uses the same development limit (**Attachment A**).

The cultural woodland associated with Mullet Creek is contained entirely within the valley feature and setback; therefore, the potential maternity roost habitat for endangered bats associated with the woodland does not represent an additional constraint.

Description of the Proposed Development

The previously proposed development plan (submitted in 2020) for the property consisted of townhomes. The current proposal consists of a 12-14 storey apartment building with three levels of underground parking. The redevelopment will be accessed by an internal road from Tannery Street. The current Site Plan, prepared by SRM Architects, is provided in **Attachment A**.

Impact Assessment

While the form of the proposed redevelopment has changed from townhomes to a residential tower, the current Site Plan respects the previous limit of development that was established in 2020 and subsequently approved by the City and CVC.

The proposed Site Plan remains outside natural heritage features and hazard lands associated with Mullet Creek. The development limits continue to be setback from the LTSTOS and provide for unencumbered access to the valleylands should maintenance or emergency repairs be required.

Consistent with the EIS (Beacon 2019), the proposed development is not expected to have direct or indirect negative impacts on the natural heritage system provided the recommended mitigation measures in the EIS are implemented. As outlined in the EIS, key mitigation measures that are recommended to protect and enhance the NHS as well as mitigate impacts to tableland vegetation include:

- Limit grading to the development area and attempt to match existing grades at development limits and along tree protection zones;
- Good quality topsoil resources should be salvaged and reused;
- Dust control will be the responsibility of the Contractor and will be managed through construction specifications;
- Use trench plugs or anti-seepage collars along installed services to prevent redirection of groundwater flows and water table lowering, if necessary;
- A construction dewatering plan should be prepared to the satisfaction of the City or CVC, as required;

- If permanent ground water controls are required; then a passive system for redirecting ground water flows is recommended;
- Implement sediment and erosion control plans to ensure that sediments are contained on the site and do not enter the watercourses;
- Implement appropriate BMP's and SWM controls recommended in the Servicing and Stormwater Management Plan;
- Prepare and Implement Valley land Restoration Plan at detailed design;
- Limit vegetation / tree clearing between September 1 and March 31 so as not to impact breeding birds; and
- Restore tree canopy by planting replacement trees as per City requirements.

As with the previous applications, the proposed redevelopment will provide a net overall positive benefit to the ecological health and integrity of the Mullet Creek valleyland. The previous industrial development associated with the subject property extended under the dripline of the woodland trees up to the edge of the valley slope, which contributed to the degradation of the valley. Under the proposed Site Plan, buildings and structures will be setback from the physical top of slope by 14-20+ m, thereby creating opportunities to restore and enhance most of the setback area as well as portions of the valley slope.

Summary

In summary, the proposed changes do not affect the overall conclusions and recommendations of Beacon's previous studies and investigations. The proposed development is consistent with the limit of development established in 2020 and provides the same level of protection for natural heritage features and hazard lands. The proposed development also continues to provide a net ecological benefit to the natural heritage system associated with the Mullet Creek valleyland, which will be realized through the implementation of a Valleyland Restoration and Enhancement Plan to be prepared at detailed design. The proposed changes are consistent with current Provincial, Municipal, and CVC policies and regulations relating to natural heritage protection and avoidance of natural hazards.

Prepared by:
Beacon Environmental Ltd.



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Reviewed By:
Beacon Environmental Ltd.

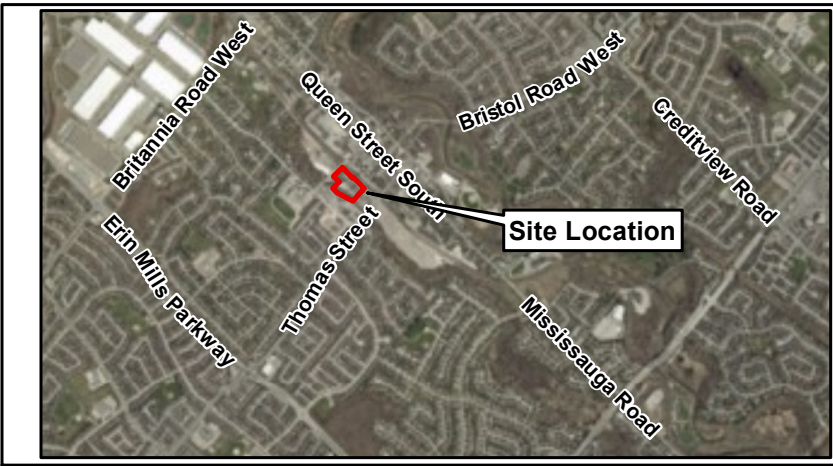


Jamie Nairn, M.Sc., P.Ag.
Senior Ecologist



Legend

- Subject Property
- Watercourse (MNR 2017)



Site Location	Figure 1
Environmental Impact Study 51 & 57 Tannery Street & 208 Emby Drive, Mississauga	
UTM Zone 17 N, NAD 83	
First Base Solutions Web Mapping Service 2022	
0 12.5 25 50 Metres 	1:1,500
Project 217069 January, 2024	

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Existing Conditions

Figure 2

Environmental Impact Study
51 & 57 Tannery Street & 208 Emby Drive,
Mississauga

Legend

- Subject Property
- ELC Communities
- Watercourse **
- Contours (Peel Region 2023)

ELC Unit	ELC Community	ELC Code
1	Cultural Woodland	CUW
2	Hedgerow	HR
3	Anthropogenic	ANT

Ministry of Natural Resources and Forestry: Watercourse 2017 **

First Base Solutions
Web Mapping Service 2022

UTM Zone 17 N, NAD 83

0 5 10 20 Metres




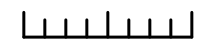

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Project 217069
March, 2024

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Environmental Constraints and Opportunities	Figure 3
Environmental Impact Study 51 & 57 Tannery Street & 208 Emby Drive, Mississauga	
Legend <ul style="list-style-type: none"> Subject Property Proposed Limit of Development Long Term Stable Top of Slope Long Term Stable Top of Slope + 7 m Floodline *** Watercourse **** 	
<small>Fiddes Clipsham Inc: Floodline 2017 *** Ministry of Natural Resources and Forestry: Watercourse 2017 ****</small>	
First Base Solutions Web Mapping Service 2022	
UTM Zone 17 N, NAD 83	
0 5 10 20 Metres 	1:900
 Project 217069 March, 2024	



Attachment A



LANDS OF CANADIAN PACIFIC RAILWAY

TANNERY STREET

EMBY DRIVE

FUTURE VALLEYLANDS