

Dear Mayor and Councillors,

The Hanlon Creek Business Park (HCBP) project has appreciable merits. The site, with easy access to Highway 401 in a community with a high quality of life, will help the city to attract top employers, create productive jobs, and provide a much-needed increase to our non-residential tax base.

In addition, through modifications to the original plan after an Ontario Municipal Board challenge, the project employs a number of strategies to protect some significant natural features of the project area.

However, the world around us has changed rapidly over the last several years. Climate change has become an increasingly central issue, as has the availability and protection of groundwater in the Guelph area. There is also a much greater awareness of the value of our natural surroundings as a core requisite for sustainability.

In this new context, we find that the plan as it currently stands has several significant shortcomings, and adjustments are needed to ensure that the project meets the environmental side of the 'triple bottom line'.

Now that the project has been put on hold at least until the spring, there is some time to try to address these shortcomings. We therefore suggest the following *reasonable changes* to help bring the project into line with the principles of Low-Impact Development, and make it fully consistent with this council's environmental objectives and achievements to date.

Wetlands are important for filtering surface run-off, for groundwater recharge, and for providing habitat for wildlife such as amphibians and reptiles. The integrity of the wetland system at the project site can be greatly enhanced by taking the following actions:

- 1) Laird Road cuts right through the main natural area to be protected and, as we saw last week, even when the road is closed significant wildlife loss can occur. The road and its bed should be removed except for access to existing residences on the west side. On the east side, the existing residence should be accessed via a new road that does not cut through the wetland (see attached map). The removal of Laird Road was originally a guiding principle of the plan to develop this site.
- 2) There is a development block planned along Laird Road that is located right in the middle of the main natural area that is to be protected (see attached map). This development block (B.5 - Block 15) should be removed from the project plan in order to improve the integrity of the natural area, and the provincially significant wetlands therein.
- 3) The size of buffers around natural features should be expanded to better reflect scientifically-based recommendations for wildlife protection. The 30 metre buffers currently planned are based on minimum Grand River Conservation Authority standards to protect mainly water quality, not wildlife habitat. Even then, these 30 metre buffers would include a storm-water ditch and a road.
- 4) We continue to support the position of the Guelph District Office of the Ministry of Natural Resources that the precautionary principle should be followed and construction should begin only after it is determined that the habitat of the Jefferson Salamander, and any other species at risk, will be adequately protected. This habitat may include six acres of seasonal wetlands that are scheduled to be destroyed.
- 5) In addition, there should be no mass grading of the hummocky topography where the Paris Galt Moraine enters the southeast side of the HCBP site in order to maintain as much natural aquifer recharge there as possible.

Trees are also important to a healthy ecosystem since they capture and store surface water run-off, contribute to groundwater filtration, prevent erosion, and provide habitat for wildlife such as birds and mammals. The following actions would help maintain the natural function of existing trees at the HCBP site:

1) Close to 1700 trees are scheduled to be destroyed, including dozens of mature bur oak, sugar maple, elm, black cherry and other native species that are an invaluable part of our urban forest. It would take decades for new plantings to replace the 33 acres of canopy they provide. At a minimum, all mature, native trees on the site need to be protected and worked into the plan.

2) There should be no mass removal of top soil at development sites so that the new trees and shrubs being promised actually have a fighting chance to grow. Severe soil compaction should also be avoided during construction since this hampers tree growth.

The City of Guelph is the primary developer and largest landholder in the HCBP, and will set a new standard for industrial development in Guelph. This new standard will hopefully be adhered to when other development takes place on Paris Galt Moraine lands in the south of Guelph, and other places in the city. In addition, other municipalities may look to the HCBP as a model.

For these reasons, it is important to get the current plan right, making it the best that it can be. We join with the Guelph Civic League in asking that the City re-engage the community and determine where compromises are possible.

Finally, we have the following related suggestion.

There are over one million square feet of unused industrial buildings in Guelph and over 150 'brownfield' sites. Redevelopment of these sites will also create jobs, and will help to reach the high urban density targets under the provincial Places to Grow legislation. We ask that the city show leadership on this issue and substantially increase investment in the reuse of existing buildings and the redevelopment of brownfield sites. This would hopefully reduce the need for 'greenfield' developments, such as the HCBP, in the future.

Sincerely,

David Sills and Norah Chaloner, representing the Council of Canadians – Guelph Chapter
Judy Martin, representing the Sierra Club of Ontario
John Ambrose, representing Guelph Urban Forest Friends
James Gordon
Hugh Whiteley
Gail McCormack
Mike Darmon