

August 31, 2020

Ms. Laurel McCreight, Planner
City of Ottawa,
110 Laurier Avenue West, Ottawa ON

By Email: kanatalakes@ottawa.ca

**Plan of Subdivision and Zoning By-law Amendment Application
7000 Campeau Drive - D07-16-19-0026**

Dear Ms. McCreight:

We are the Kanata Greenspace Protection Coalition (KGPC), a not-for-profit corporation based in Kanata North that represents over 1500 supporters and other community associations in vehement opposition to this proposal. Our intent today is to ensure this application's granular impact on our community is in front of City planning staff as you assess the ClubLink/Minto/Richcraft submission. We trust it will provide the detail that reinforces the appalling repercussions and complete lack of merit of the application. We also hope you noted an opinion letter¹ by Dennis Jacobs of Momentum Planning, our planner, dated August 31, 2020. It contains his high level review of both Provincial Policy Statements and the Ottawa Official Plan. Mr. Jacobs concludes that this resubmission by ClubLink/Minto/Richcraft should be dismissed.

We completely agree and add the following from the Ottawa Official Plan as guidance-

"Wherever growth occurs, it will be managed to ensure that Ottawa's communities are eminently liveable. This is a commitment that will be realized through a focus on community design and a concern for people and the quality of the spaces they occupy".²

Living with and Life after Covid-19

There is widespread agreement that this resubmission by ClubLink/Minto/Richcraft is even more difficult to digest than the original application. After enduring the past 6 months of life under the Covid-19 pandemic and internalizing what we have learned as a result of that experience, our supporters in Kanata echo what is reported across the globe. The value of minimally restricted, proximal access to the outdoors is now top of mind and is being affirmed as essential. Having said that, this resubmission's proposed destruction of 70.9 hectares of accessible undeveloped urban open space becomes an even more appalling idea. It is entirely inconsistent with current

¹<https://adobefreeuserschannel.na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLbqZhBnl9oqR2NI1HU4v1gTncJJJa0zhjh-UMUM7Y1PdCHwbPUDg5d3WBcHAvNCInWARfdo%2A>

² <https://ottawa.ca/en/planning-development-and-construction/official-plan-and-master-plans/official-plan/volume-1-official-plan/section-2-strategic-directions#24-maintaining-environmental-integrity>

community accessibility planning concepts (e.g.: open space access within 15 Minute Neighbourhoods) and leaves our community less resilient looking forward.³

Community remains unified in opposition to this Application

To this day, we have not received a single comment in support of any aspect of the original application or this resubmission. On the contrary, feedback is clear. Our community asserts that nothing of import has changed with the resubmission. It consistently maintains the inappropriate single focus of the original application – maximizing housing units. It does so without an assessment of identified community need, the site’s broader environmental and recreational role and value as part of a mature master planned community, site specific limitations, or future liveability within the proposed community and the existing communities. All of this to deliver windfall profit to the land owner ClubLink while maximizing corporate profits for Minto/Richcraft at the direct expense of our neighbourhoods and residents specifically, and all Ottawa taxpayers generally.

The proponents suggest that their proposal will “gently intensify an existing community in a sensitive manner” suggesting there is some form of commensalism between their plan and the existing community. We argue this application is in reality a parasite on the existing community. The approved application will destroy a rare urban gem – over 70 hectares of green and open space, the ‘green heart’ at the centre of the neighbourhoods of Kanata Lakes and Beaverbrook. The resubmission warrants a recommendation of dismissal by planning staff for this reason.

The City and its Communities suffer when the entire Planning Process is not respected

Consultation and engagement is an essential part of community planning and design. It bears noting that ClubLink/Minto/Richcraft and its representatives have not legitimately engaged our community on what they knew would be an unwelcome project. The community was blindsided in December 2018 when the initial concept was raised and then again in October 2019 when a development application was revealed. Beyond an initial request to the community during the 2018 Christmas Holiday period, they have made absolutely no outreach beyond meeting with Councillor Jenna Sudds. They have, however, gone to the written effort to claim the opposite suggesting that they have been rebuffed by the KGPC. This is patently false and it is important that you know that.

As you do know, the proponents have further refused attendance and participation as part of mandatory consultation in the City planning process. After stonewalling and inaccurately presenting design assumptions and details in an orchestrated community consultation in November 2019, they refused to attend the subsequent follow up session of January 2020. We

³ <https://theconversation.com/how-cities-can-add-accessible-green-space-in-a-post-coronavirus-world-139194>

also wish to note that they have made no effort at consultation with the KGPC or other community groups in regards to this resubmission.

Further, we suggest they have failed to address appropriately and completely the December 2019 city feedback to the original application. The KGPC and our community are shocked to see them resubmit a proposal of increased density to 1544 units. We were also stunned by the disrespectful stonewalling in their reply followed by a failure to address these issues in their resubmission (e.g.: the repetitive acknowledgement by the word “noted” to key issues such as the availability/facility for students from this development in area schools by all area school boards). These behaviours by ClubLink/Minto/Richcraft and their proponents create a lack of trust and confidence in the community which degrades broad confidence in the entire planning process which must, by design, respect all parties and certainly the taxpayers.

We look too at the general lack of confirmatory detail in the proposal. There is ongoing worry about an approval decision by the City at 10,000 feet that allows ClubLink to sell the site property to its partners Minto/Richcraft without adequately addressing the residents’ important and irreversible ground zero concerns. The proponents repeatedly assert through the original application and resubmission that the detail ‘remains to be worked out’ in the technical discussions which will ultimately occur after the approval has been given. Our planner Dennis Jacobs addresses this community concern in his opinion letter and we quote for emphasis:

“the applicant indicates that many of the issues raised by the City and community are not necessary to support a rezoning application and can be addressed through the technical review of the subdivision as well as future site plan applications. To be clear, the applications under review include both zoning and subdivision and therefore it is my opinion, these studies cannot be put off. An approval of the rezoning would signal that the premise of redevelopment has been accepted as being in conformity with the Official Plan. This would open the door to the sale of the lands which would shift the focus of review to technical matters that may not be resolvable. Thus, I reiterate that this level of scrutiny must be undertaken now.”⁴

The KGPC respectfully remind the planning staff that we need look no further than the ongoing stalemate at the nearby KNL land site, where new development was approved without the necessary details and agreement as to what defined an appropriate drainage system for the Kizell watershed. The forested land was razed despite profound community opposition to allow site preparation. That process abandoned our community by not completely addressing design concerns before approvals were given and, we suggest, it should not be repeated here. The community was forced to endure the torment and to see, hear and live with the environmental loss and still, the approved development has not appeared. A destructive waste.

Is this Development Needed?

⁴<https://adobefreeuserschannel.na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLbqZhBnl9oqR2NI1HU4v1gTncJJa0zhjh-UMUM7Y1PdCHwbPUDg5d3WBcHAvNCInWARfdo%2A> , page 8

The housing market is robust and the existing Kanata stock is specifically appreciated by the companies in the Kanata North Technology Park . These employers appreciate neighbourhoods where quality housing co-exists with accessibility to green, open recreational spaces, municipal management is efficient and sensible and social responsibility is valued because these characteristics are in turn valued by the international workforce they wish to attract.

These employees become new residents in Beaverbrook and Kanata Lakes because they embrace the natural environment through the award winning ‘garden community’ concept design created by Bill Teron decades ago. This resubmission instead proposes a design that is antithetical to this concept and, by virtue of its approval, will destroy the central open space essential to the winning structure of both neighbourhoods. This will surely not help the Kanata North Technology Park attract the essential human resources it needs.

To meet the identified future needs of Kanata North there are more than 9,000 homes approved in Kanata North and nearby West Carleton which are projected to meet the housing needs for the next decade. There is no direction in the Official Plan or its policies for the 1544 homes in this proposal. The staff should recommend dismissal of this application which is not only superfluous but that is also fraught with irreparably negative community impact in the form of loss, cost and risk.

Should this Development be considered Appropriate for Our Community?

The resubmission fails to address or correct the scotoma inherent in the Planning Rationale and Design Brief of the original application. The initial approach akin the land to an infill site suggesting the property is a “new development on vacant land in designated growth areas that contributes to the completion of an existing community.” A 1544 unit development is beyond the scale of ‘completion’. It is clearly a community in its own right and, in this case, is also wholly incompatible with the existing surrounding neighbourhoods. The proponents then chose to embrace the undeveloped nature of the 70.9 hectare site property and opportunistically labelled it a greenfield site while choosing to ignore its intended design and ongoing use as a recreational site shared with the existing community. Planning staff should recommend dismissal of the application as inappropriate site design and use.

Is the Development Consistent with Provincial Policy Statements(PPS) and the Official Plan(OP)?

We are opposed to the opening and repeated premise of this ClubLink/Minto/Richcraft development resubmission that assumes this entire 70.9 hectare site of planned open recreational urban space is “underutilized” and “a unique opportunity for redevelopment”. They make this determination apparently because the site is uninhabited and undeveloped thumbing their nose at both the history of the master plan for the site and overall area as well as the PPS and OP. We further suggest these statements are poor assumptions and entirely inconsistent with the Strategic Directions of the OP which include but are not limited to:

Managing Growth:

- Infill and redevelopment will be compatible with the existing context or planned function of the area

Maintaining Environmental Integrity:

- Provincially and locally significant wetlands and forests will be conserved.
- The City will preserve natural features and the integrity of natural systems by directing land use and approving and development that maintains ecosystem functions over time.
- Green spaces will be valued and protected for their environmental, cultural heritage, recreational, educational and aesthetic qualities.

Building Liveable Communities:

- Growth will be managed in ways that create complete communities with a good balance of facilities and services to meet people's everyday needs, including schools, community facilities, parks, a variety of housing, and places to work and shop.
- The design of the city, the maintenance of greenspace and the high quality of life will enhance the attractiveness of the city for business development.
- Familiar landscapes and heritage buildings will be conserved despite on-going change.

We again direct you to the submission of Dennis Jacobs to address the detail of the multiple inconsistencies of the resubmission with both PPS 51 and the OP.⁵ These include density and lot size; design criteria; height propositions and areas of intensification; broad incompatibility issues with existing neighbourhoods and matters of public safety. We expand on these below.

Can Development on this Land be completed Safely?

Heavy Metal Contamination

Additional Phase II Environmental Site Assessment (ESA) work is included in this resubmission and importantly confirm widespread mercury contamination of an undisclosed form.. The Paterson Group Phase II ESA report concludes the requirement for full site remediation is necessary to meet MECP residential standards for mercury. In a separate submission⁶ on August 27, 2020, we noted serious concerns and deficiencies in the framework of this additional Phase II work including the absence of a planned sampling strategy, a failure to consider site history in the analysis, a clear bias in sample site selection (ClubLink prevented the testing of the probable key sites of contamination), the amount of sampling involved (an equivalent of one test per 1.2 hectares of land on a 70.9 hectare site) and premature conclusions on groundwater safety. Despite these shortcomings with the Phase II ESA work completed to date, the levels of mercury found point to contamination across the site at up to 10 times acceptable residential levels. Further, we identify no testing in the pond sediment at depth or in the various woodlands in this proposal which may affect conclusions on groundwater safety. There is a concern that other

⁵<https://adobefreeuserschannel.na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLbqZhBnl9oqR2NI1HU4v1gTncJJa0zhjh-UMUM7Y1PdCHwbPUDg5d3WBcHAvNCInWARfdo%2A>, page 4

⁶<https://ourkanatagreenspace.ca/kanata/wp-content/uploads/2020/08/Review-Phase-II-ESA-Final.pdf>

heavy metals (e.g.: arsenic) which have also been used extensively and historically on golf courses up to 2008 could be present in dangerous quantities.⁷ The Paterson Group is premature in inferring soil mediation across the site is an appropriate solution. There is no assessment that provides that the site is safely remediable given its embedded location within a fully developed community.

For the protection of public safety, the KGPC requests that in advance of any application approval recommendation by staff, a fully transparent sampling, testing and assessment process be commenced consistent with MECP Brownfield Guidelines that includes public participation and consultation with an intent to identify not only the risks to community safety by soil disturbance secondary to site development but also the risks and impacts of soil remediation.

Will Current Residents be exposed to Radon Contamination Secondary to Structural Damage?

The release of naturally occurring radon gas from the substantial bedrock deposits secondary to blasting and the resultant contamination of neighbouring homes, is a health issue and risk for neighbouring homeowners. The Paterson group acknowledges in its Geotechnology Investigation report that vibration on this site secondary to the amount of blasting and other soil, rock and sediment manipulation is expected to be high and should be avoided. We suggest there is a uniform and extremely high level of concern in the community around blasting, given the many hundreds of homes within tens of meters and which could suffer physical property damage, untenable noise and vibration and leave the residents with health repercussions. A broad community consultation and risk assessment program, monitoring, mediation and reparation program should form a necessary part of any approval recommendation of this proposal.

Does the Development plan address the City's Climate Change mandate?

This expansive property covered with turf grass, plants, shrubs and trees actively convert carbon dioxide to oxygen making important contributions to climate change mitigation. With the elimination of 70.9 hectares of these photosynthesizers, carbon dioxide will drive greenhouse gas (GHG) emissions at the expense of the city. The conversion of this site to one that is safe enough for residential housing through soil remediation, site preparation and construction will further contribute to GHG. In the process we will destroy the mitigation benefits the site provides.

The environmental impact(cost) of this proposed development to our community and City has not been identified. It is both large and permanent and, as a result, requires assessment by qualified professionals given the City of Ottawa's April 2019 acknowledgement of a Climate Change Crisis and its subsequent development of a Climate Change Master Plan. The plan

⁷ <https://www.sun-sentinel.com/health/fl-reg-golf-courses-decontamination-20170619-story.html>

identifies a necessity to address Ottawa's need to become both resilient and renewable by reducing GHG and adapting to climate change by protecting people and property and enhancing the natural environment..⁸ The staff should recommend dismissal of this application as counterproductive to this important city plan.

Does the Development Design Support a Healthy Community?

The Development denies Residents Access to Expansive Naturalized Open and Green Space that is Essential for a Healthy Lifestyle.- In this proposal, ClubLink/Minto/Richcraft have carefully avoided assigning benefit to the 70.9 hectares of open recreational land to an urban community. They ignore its planned historic use as a shared accessible open recreational space, the resulting health benefits or its critical ability to mitigate climate change as noted above.

The residents of Kanata Lakes and Beaverbrook walk on and off the entire site via thousands of points of access throughout their neighbourhoods including private properties and linked multi-use pathways (MUPs). Residents can run or walk for hours across linked parkland and forest trails because these shared use lands are central to the planned trails, walkways and MUPS for other area neighbourhoods such as Kanata Town Centre with high and medium density living to the south and Heritage Hills to the west in addition to Beaverbrook and existing Kanata Lakes. This large, linked, expanse of land allows for single or group high energy recreation such as golfing, cycling, running, cross-country skiing, hockey, skating and tobogganing. It also allows for low energy activities such as bird-watching, and walking or standing silently and simply reflecting on one of nature's ecosystems. Science reaffirms that planned accessibility to these experiences and activities are important in the planning of healthy communities.

We agree that our community is indeed fortunate to have this gem. We respect it and suggest it should be a model of design not a rarity. Our reality however is in no way equivalent to the submission's proposal for two patchwork pieces of unlinked parkettes and a park that total 11.1 hectares and represent but 15% open space in the proposed community. The communities of Beaverbrook and Kanata Lakes will number 12,000 people (7,000 existing and 5,000 new) and would be left with a pittance of open space by this proposal. The small unlinked parkettes are described in the Urban Design Brief as 'passive park space'. We have been asked... is that because they are too small to be active within? They are fully programmed with a list of play equipment, shade structures, fitness stations, all directed and restrictive uses that will be limited to short duration based on the parkette sizes and the high demand for the green space remaining. The Design Brief also notes woodland trails will exist in a forest parcel that is a few hectares in size but that would provide no more than a minute exposure in a walk by. A city cannot be experienced by looking on Google Maps nor is a forest or woodland experienced by walking past a small stand of trees. The equivalencies proposed by the proponents are preposterous.

⁸ https://documents.ottawa.ca/sites/documents/files/climate_change_mplan_en.pdf , page 5

The City planning staff should recommend dismissal of an application that diminishes the benefits to healthy living and resident health and its lack of support for an active community lifestyle for all ages.

Does the Design protect the Environment?

The Tree Canopy must be Protected

We are tremendously concerned that the resubmission continues to fail to protect the existing woodlots. In several places, notably towards Walden Woods, along present Holes 6, 7 and 17 and the perimeter broadly, there are expansive amounts of forest and trees being destroyed with this plan. A complete and comprehensive inventory of the jeopardized tree canopy is missing. The KGPC believes a new review of the proposal is required with a goal of maximizing retention of the existing tree canopy and all woodlots before approval recommendation is given.

Our supporters have also brought to our attention that there is no inventory of trees at risk on adjacent land at the perimeter of the site both on private property and in parks such as Walden Park. There are many trees at risk of critical root system damage secondary to the proposed development. There are no reports of consultation with the neighbouring owners to inventory, assess value and create a protection plan for the critical root zones of these trees to promote retention or, to provide a mitigation plan in the event of loss. This proposal should not be recommended for approval without an independent assessment and sufficiently detailed plan to address how the development will mitigate the loss and damage to the tree canopy on the site and on nearby public and private lands.

Species At Risk

There is further concern that the resubmission application does not respect the protection plans required for species at risk. An example cited is a significant portion of the woodlot adjacent to the tee on Hole 7 which is proposed to be removed (by substantial blasting) to achieve a grade change for SWM Pond 2 of up to 10 meters, despite the presence of nearby butternut tree. The recommended protection zone seems to be at odds with the location of the proposed SWM 2 lagoon as well as new residential lots. All situations involving species at risk across the proposal should be fully re-examined to ensure all policies and guidelines are being met.

Large Urban Spaces (even Golf Courses) are Capable of Supporting Ecosystems and Wildlife

The loss of this expansive space will also decimate the wildlife that live in our community and, as a result, it will be forever changed. This is an important and highly emotional aspect of the proposal for our supporters in the Beaverbrook and Kanata Lakes area and should not be understated or quickly dismissed. The community expressed serious concerns at the public consultation in November 2019 about the analysis and accuracy of the McKinley Environmental

Services report in this area. The anecdotal reports of the community despite corroboration by pictures and videos is not reflected in the resubmission.

In Addendum A, a registered biologist in our community refutes many statements around existing wildlife by Mckinley Environmental in the proposal. The writer's limited perspective was the northerly pond at Hole 8 and did not include visits to the wetlands and southerly pond at Hole 9, the fully naturalized fens along Hole 12 or other important forested and wetlands around the property. Despite lacking unrestricted access to the entire property, the author is easily able to refute significant portions of the McKinley Environmental analysis. Unfortunately this is yet another example of the biased and simplistic approach to sampling and data gathering that permeates this application and resubmission. The City staff should recommend dismissal of the application until an independent environmental impact analysis is available.

Are known Stormwater Management (SWM) infrastructure concerns addressed?

The site property contains an important naturalized SWM infrastructure including 70.9 acres of penetrable land with two ponds to drain the site and the Kanata Lakes and Beaverbrook neighbourhoods, in addition to an manmade underground SWM system connected to the Kizell Drain. The overall system was created in the late 80s as part of the existing Kanata Lakes residential development and was required to address extensive surface groundwater issues and flooding risk in Beaverbrook. As said earlier, various levels of government with jurisdiction have noted environmental concerns about deficiencies in the Kizell system which require resolution. Loss of permeable land to new residential developments within the watershed is driving the concern. The KGC's site as uppermost in the watershed and this proposed development of 1544 homes are inextricably linked to the this ongoing situation and will cloud resolution further. Application approval which will allow for the destruction of the KGC lands should not be given until this larger and historic issue of the Kizell Drain is resolve.

The documentation is unclear that the assessors have well considered the overland drainage and runoff from Beaverbrook into the flow volumes for the system. A review was submitted by resident Denis Bourque on August 31, 2020 which may identify a lack of data consideration around the additional SWM load at the Beaverbrook trunk. There have been known SWM system failures in the past (2002) which have caused significant private and some public property damage along the east side of the golf course site and Beaverbrook Road. In the same area, we have this written correspondence from a resident:

The construction of stormwater pond #4 on the 13th hole behind our property is of major concern to us. We have had the Kanata Golf & Country Club (KGCC) on two occasions (most recently in 2018) address drainage problems emanating from the 13th hole as it currently exists. In 2018, KGCC consulted with the City of Ottawa but ultimately the KGCC replaced an existing drainage pipe and created a gravel trench to deal with instances where drainage water was "gushing/bubbling" from the ground and ponding. Since we have already encountered ground level/surface flooding that could potentially reach our residence (and other properties), which

*lie **below** the grade of the 13th hole, we have major concerns about what possible impacts the construction of pond #4 [corrected Pond #3 in the Resubmission] could have. With the recent heavy rains, you can visibly see and hear the water "gushing" as it drains from the hill. (NB: at one 2019 open house, we learned that the city drain where the aforementioned "golf course installed pipe" drains into, is **NOT** on the city's "drain inventory" and this is of concern to us. We want to ensure that the City considers this drain in their assessment of potential impacts from storm pond #4.*

M.C. By email to L. McCreight August 29, 2020 (highlights original)

We note the removal of the SWM 3 lagoon on Parcel 2, along the east periphery adjacent to Beaverbrook, which was replaced by an Oil and Grit Separator (OGS) in the resubmission. The reasoning for this redesign change is not well described. We also note that the original SWM 3 site is now replaced in the resubmission with additional single family lots. Important changes to a plan without explanation cause reader confusion. Confusion amplifies to concern when we read that the City of Calgary, Best Practices deem an OGS as an unsuitable replacement for a SWM pond in reducing pollutants to streams and other catchment areas.⁹ In addition, OGS are now incorporated at all four proposed SWM lagoons although their locations are not identified nor are their physical features or the service access points required to manage and service them. There is an absence of details to allow nearby property owners to understand the systems or their impact on their properties including a propensity to overrun in large storms and the entrapment of small animals and amphibians.

Other parts of the resubmission also confound our supporters. In the Stormwater Management Plan¹⁰ there are multiple references to discrepancies between the reports of the City of Ottawa models and the analysis. Excessive water runoff, surface sheeting and pooling, associated with both seasonal and the more frequent heavy rains, are endemic to the property and at the very least, we would expect these issues to resolve with this encompassing site redesign which includes a massive new SWM infrastructure. Regrettably, in the same document, we see a reference to the planned future use of sump pumps due to an expected high water table and grading issues in various areas of the redeveloped site. The number of properties affected and the extent of this seeming unresolvable high water table issue is not elaborated upon.

Note that due to grading constraints within the development sump pumps will service several homes. Further details of these exact locations will be provided at the detailed design stage. There are a few locations where the 100-year hydraulic grade line is less than 1.8 m below the proposed ground elevation.¹¹

⁹ <http://www.rainwatermanagement.ca/wp-content/uploads/2014/04/City-of-Calgary-Stormwater-Management-Design-Oil-Grit-Separators.pdf>, page 196

¹⁰ http://webcast.ottawa.ca/plan/All_Image%20Referencing_Subdivision_Image%20Reference_2020-07-16-%20Stormwater%20Management%20Plan-%20D07-16-19-0026.PDF, page 3

¹¹ Ibid, page 6

We are not aware of any consultations with existing owners or community association representatives to support data collection which would expand the history on these issues and identify existing SWM system weaknesses on the site, address unresolved political and policy impasses and an effective option analysis in an effort to deliver a supportable SWM plan. The KGPC and our supporters are well aware that we are not SWM experts, however, all of the above in combination and without information and consultation fails to build confidence in what might be described as a very risky situation for existing and future homeowners.

The community lacks confidence that the appropriate assessment and broad party expert solution to the SWM issue across the Kizell Drain area is near solution. Further, the number of existing SWM issues in both minor and major systems in the neighbourhoods of Kanata Lakes and Beaverbrook suggest a more holistic assessment is required before assuming the existing infrastructure can be seamlessly built upon. We strongly suggest that this proposal for the KGC lands cannot be supported by planning staff without addressing and solving either of the above. Approval for the sale and ultimate destruction of this singular space should not be considered until appropriate resolution of the issues with this critical infrastructure are resolved.

Is the Proposed Site Design Safe and Appropriate?

Medium-Density Intensification with Benefits- The resubmission ignores the intended use of Campeau Drive as a condition to restrict medium and high-density buildings to the area south of Campeau which slopes downward towards the 417 highway. This land feature is important to the area because it has allowed the setback of low-density structures on the south side of Campeau Drive while accommodating high-density height along the highway.

Not only does the resubmission continue to inappropriately propose a medium-density (6-9 floor) development along the north side of Campeau Drive in opposition to the original area plan, it intensifies the design by increasing the buildings to six-storey designs with no setback. We also note the 22 meter height proposed is well beyond the 18-20 meter height required for a six-storey residential building. These medium-density buildings without a setback and with a 7th storey ‘in waiting’ are inconsistent with the intent of the OP and should not be supported by staff.

High Risk Intersections - The resubmission offers only six major intersections to manage the access and egress of 1544 units. This of course is a direct result of the physical site restrictions and long land peninsulas with only long cul-de-sacs that do not allow for inclusion of appropriate secondary road linkages. The traffic volume at these six intersections seriously concerns the community and we note that several of these intersections are within tens of metres of existing troublesome corners.

As an example we note Street 17 and Weslock Way which is within metres of Weslock Way and Knudson Drive and Weslock Way and Beaverbrook Road, all of which are major pedestrian

crossovers used by hundreds of school children daily traversing on foot to the schools located beyond the 5th green. The site plan not easily afford a solution to the issue most probably because the area is restricted by important characteristics (e.g.: prominent Canadian Shield outcroppings at Weslock Way or tall hedges and landscaping along Beaverbrook Road) or the existing housing development nearby or because ClubLink/Minto/Richcraft are unwilling to give up unit volume and density to achieve planning space and thereby create options. Regardless, planning review should dismiss such a disaster in the making in the name of public safety.

Another example is the critical transit area of Campeau Drive. This thoroughfare is already congested for all of the users from Beaverbrook and Kanata Lakes travelling east to west to the shopping at Kanata Centrum and west to east for the residents, students and commuters linking with March/Eagleson Roads or the 417. The siting of the gateway entrances and exits in the plan proximal to the Campeau Drive and Kanata Ave intersection will intensify the traffic risks.

This site is not appropriate for a residential neighbourhood because it is not conducive to safe and roadway layout which will lead to increased pedestrian and cycling risk while also decreasing the attractiveness of these healthy forms of travel. It will take the form of increased collisions and injury, vehicular noise and emissions, all of which bode poorly for healthy and safe communities. In the absence of a resolution of these issues, the staff should recommend dismissal of the application.

Stormwater Management (SWM) Lagoons - The Urban Design Brief changes the name of the purpose-built SWM lagoons and maps them as a ‘Proposed Pond’. This is disingenuous and dangerous. It is wrong to allow ClubLink/Minto/Richcraft to misrepresent these areas as a pond and imply there is something naturalized or accessible when they are not intended to provide any residential use. It is further disingenuous to include their calculated area as part of accessible open areas. Safe management of these holding lagoons should begin by City staff now with an insistence that the proponents more accurately, fairly and safely represent their proposal.

The resubmission proposes four SWM lagoons with a combined area of 7.3 hectares, which represents fully 10.3% of the entire property situated within two neighbourhoods that will house 12,000 or more with development approval. They are immediately adjacent to or within 6 meters of almost 100 homes, open areas and walkways.

Lagoon 1 - 23 homes adjacent on 1 side with a linear park, Hydro ROW

Lagoon 2 - 13 homes adjacent on 3 sides, 6 (estimate) homes a road width away on side 4 with a park and school pathway immediately adjacent

Lagoon 3 – 22 homes adjacent on 2 sides with a park and a Hydro ROW

Lagoon 4 – 15 homes adjacent on 3 sides with 17 a road-width away on side 4

Nonetheless, there is no detail about fencing, lighting or other security, water aeration to reduce contamination by algae, mosquito breeding treatment for public safety or lifesaving equipment to assist the child, animal or adult that ventures too far. The KGPC suggests respectfully that a residential site that requires over 10% of its property dedicated to unprotected surface SWM does not meet the criteria of a safe community, especially for a young families with children and for that reason, the proposal should not be recommended for approval.

Is the Site Design Compatible to the Existing Neighbourhoods?

Density – Unfortunately, this plan easily lends itself to higher density and the submission further maximizes it with a preponderance of 10.6 meter wide lots. Unfortunately, once again, the proponents misrepresent the density data to present the picture they prefer. We offer the corrected density data with explanation.

Existing Beaverbrook Density*	7.8 homes/hectare
Existing Kanata Lakes Density**	9.3 homes/hectare
Proposed Kanata Lakes Density	21.6 homes/hectare

*In Beaverbrook, ClubLink/Minto/Richcraft used only a strip of streets along the site and did not include the broader picture of homes and roads and parks for true comparative benefit.

**In Kanata Lakes the existing density calculation was artificially inflated by including some medium/high density properties in the Kanata Town Centre north of Campeau Drive and it was further inflated again by failing to include open space, in this case the entire KGC property.

It is obvious that this proposal is entirely incompatible design based on density, with increases of 177% over neighbouring Beaverbrook and 132% over the density in Kanata Lakes today. The KGPC requests the staff recommend dismissal of this application as a result.

Peninsular shapes do not support clustered or linked neighbourhoods which are central to the existing master planned community. - This very large 70.9 hectare site was purpose-built in the 1980s design of the Kanata Lakes community by Campeau Developments. People involved at the time suggest the most cost effective layout was chosen for residential development with an intent to minimize blasting, excavation and thus costs, manage surface water issues and leave key granite and environmental focal points while creating an 18 hole golf course and shared recreational site on this remaining parcel. The resulting four sinewy, disconnected and peninsular sections, enveloped distinct clusters of housing neighbourhoods, each different but compatible in design and with the provision of open space for linkages between the clusters and for immediate access to the open golf course land. The ClubLink/Minto/Richcraft designers have simply taken the peninsular parcels and forced cul-de-sac streets striped with strips of houses down their lengths. This is fully incompatible site plan design to the existing community.

The problematic shape of the four parcels of the site and the subsequent prevention of a cluster design with buffer zones prevents the use of these open spaces for both transit linkages and recreational use. The community presently makes extensive use of the linkages to support transit around the neighbourhoods. Trails, sidewalks and MUPs criss-cross the KGC lands and integrate Beaverbrook to the shopping areas around Kanata Centrum, Kanata Lakes to March Road employment nodes as well as primary and secondary school locations in the surrounding perimeter of the site property. Kanata North employees use these trails, pathways, sidewalks and MUPs as do their families for school, church, shopping and other community service connections to which the KGC site property is central.

The resubmission ignores the role the KGC lands play in these commutes. Foot and bike travel will not survive the profound inaccessibility created by these peninsular cul-de-sacs and specifically for the hundreds of existing lots which will become fully land-locked. On Windeyer Crescent as an example of several in this proposal, residents will have to choose to “go out of the way” to head to the transit node at Terry Fox or Kanata Centrum shopping or to the schools of Beaverbrook.. As one supporter offered, it is “like flying through Toronto to get to Montreal from Ottawa”. Further, this directly impairs the ability of Kanata Lakes and Beaverbrook to become the 15 minute neighbourhoods of tomorrow.

A Private Buffer is not Accessible Open Space nor does a Hedgerow replace a 10 meter Tree- Beaverbrook and Kanata Lakes use a treed buffer separation, sprung from the original Teron cluster design, to provide open vistas and tree canopy. The attempt at a compatible buffer zone between the proposed and existing streets in the initial application by ClubLink/Minto/Richcraft was confusing. In its December 2019 Technical Comments the City appeared to dislike the lack of definition, ownership, management and maintenance of these areas. The resubmission returns with a pared down three meter privately owned buffer abutting the rear property line of the new properties and also precludes permanent structures in these areas but it does make reference to a hedgerow.

The community sees the new plan as more offensive than the original proposal. The proponents suggest these three meter areas can provide the natural treed buffer zones essential for providing open space design compatibility. That is both an opportunistic and unrealistic suggestion. The community has no access to or control over private property, cannot use it recreationally or can it truly provide the vistas and linkages that large buffer zones can do. Further, this model does not support robust 6-9 plus meter zones that will allow for the growth of a sizeable mature tree (10 meter tall) as part of a replacement canopy. The three meter zones will be planted with small trees and shrubs (to avoid foundation damage) which will not support open vistas when fence bound on either side nor is there a commitment to tree replanting.. Neither will the small buffers address the disparate land height along many of these abutting property lines as compared to the more flexible and effective 10 meter buffer zones. Many streets in the resubmission show very

substantial grade differences (e.g: beyond three meters behind sections of Windeyer Crescent). There is no detail offered to address the retaining walls and loss of open vista that will result due to this very negative design complication.

This proposal is also fraught with ‘real life’ management issues that are bound to build rancor and neighborhood disquiet. If the goal is a treed buffer zone, how does the greater community control or support the maintenance or the protection of trees on private property? How does the 30 meter² buffer (i.e.: 3 times 10) in a 90 meter² (i.e.: 9 times 10) rear yard (fully one third of the typical rear lot size proposed) effectively grow and flourish to meet the above goals? The proposal suggests that property restrictions will prevent permanent structures in these spaces. Is a trampoline five meters in diameter inside a 5 meter high netted enclosure a permanent structure? It is not designed to be, however, the reality is they go up and do not come down and they are often pushed to the very rear of the backyard lot. In Dennis Jacobs’ professional opinion, he describes the failure of an attempt at this design choice in Nepean decades ago¹². This design suggestion is fatally flawed and will not deliver on its goals and, we would suggest, that accepting it and repeating it will not make it better planning.

Does the Development provide for Essential Community Services?

On the matter of community services the resubmission requires the reader to accept that this is an infill development where the needs of a handful of additional residents can be seamlessly met by existing services in the neighbourhood. The proposal fails to allocate any land use space for basic community services that 5000 new residents will require. It requires a reader to assume that these thousands of residents will be seamlessly absorbed into the delivery stream of the education, health, transportation, protection, retail and other important community services that exist in adjoining mature neighbourhoods.

The proponents received feedback from the school boards in the Technical Comments that local space may not be available, but rather than reduce density and housing they further increased it by 42 units. There is no inventory of excess community services whether it be health, recreational space or programs based on the reports from the community. Our supporters are very concerned about the lack of depth of some services currently (e.g.: education and health), the lack of or limited plans for service intensification (e.g.: transportation and retail) and therefore the inability to meet the needs of this young community. It bears reiterating, there is not a single service site identified in this plan to shoehorn 5000 residents into an existing community. The staff should recommend dismissal of this proposal which fails to plan for essential community services.

Will the Development contribute to Sanctity of Home and Quality of Life?

¹²<https://adobefreeuserschannel.na2.documents.adobe.com/public/fs?aid=CBFCIBAA3AAABLblqZhBnl9oqR2NI1HU4v1gTncJJa0zhjh-UMUM7Y1PdCHwbPUDg5d3WBcHAvNCInWARfdo%2A> , page 15

Seemingly all residents are expressing fear at the potential impact of this proposal on their mental and physician health. Many cite the impact of the loss of the 70.9 hectare accessible open space on their health. We note a 2016 study by The World Health Organization¹³

“Urban green spaces, such as parks, playgrounds, and residential greenery, can promote mental and physical health, and reduce morbidity and mortality in urban residents by providing psychological relaxation and stress alleviation, stimulating social cohesion, supporting physical activity, and reducing exposure to air pollutants, noise and excessive heat.”

In addition to the large number of residents who are enjoying retirement at home, in a Covid-19 affected world many residents are now in their homes full time as well, working and schooling remotely and, these situations could be long-standing or become permanent. The unknown changes that will result from the Covid-19 pandemic may require us to more rapidly embrace a new lens through which we look at planning accessible outdoor open and green space in our communities.

Those immediately adjacent to the site (many as close as 10 meters) are further burdened with unquantified stress worrying specifically about physical property damage and important health safety risks. The community should have the benefit of a health risk and mediation assessment study due to the scale of the project and its proximity to thousands of occupied residential homes. It should necessarily assess the risk of heavy metal remediation and radon gas as well.

This expansive proposal will require significant amounts of site preparation (after extended periods of soil remediation required to address the soil contamination) including the extensive blasting (less than 10 metres from homes) on the significant areas of bedrock. Due to the intense density planned, the amount of development will inflate the construction and broad period of widespread community upheaval and loss of quality of life for up to a decade. In light of the Covid-19 changes to household travel mentioned above, many people may not have the option to leave the home for large portions of the day and avoid the repercussions of this development.

The Geotechnology Investigation notes the risks of vibration from extensive blasting on this site and recommends reducing the normal monitoring perimeter distance and, as laymen, we can only suggest this confirms our suspicions. At minimum, an outreach, inventory, assessment and mitigation program with community participation should be mandatory before the proposal is approved to avoid the need for existing homeowners to fund the retention of experts to identify baselines against property damage. This proposal is an onerous and unreasonably burdens

¹³ <http://www.euro.who.int/en/health-topics/environment-and-health/urban-health/publications/2016/urban-green-spaces-and-health-a-review-of-evidence-2016>

nearby neighbours yielding both health hazard risk and undo financial investment and hardship to protect their homes and staff should recommend dismissal.

Conclusion

The KGPC remains vehemently opposed to this development application and request your recommendation to Planning Committee to dismiss this resubmission. We have noted adequate evidence to call into question the accuracy and objectiveness of the many portions of the application including the McKinley Environmental Services Report and the Paterson Group, Phase II ESA, May 24, 2020.

The KGPC strongly suggests that there are many issues upon which staff should recommend dismissal of this development including

- Significant conflicts with Provincial Policy Statement 51
- Significant conflicts with the City of Ottawa Official Plan including and most importantly a profound inconsistency with existing neighbourhoods
- Absence of an identified need for the development today or in the foreseeable future
- A profound negative impact on Climate Change
- Incomplete site contamination assessment and identification of public health risk issues
- Insufficient address of existing site SWM issues and complication of unresolved issues within the Kizell Drain
- Profound environmental loss of woodland, species at risk and wildlife
- A risk inducing site design creating unsafe exposure to SWM systems and transportation intersections
- A structurally incompatible site design including a loss of transportation access and linkages and loss of open space
- A failure to plan for and accommodate essential community services for residents
- A failure to improve resident quality of life while creating health and financial hardship

We wish to remind the City staff that approval of this application without the high level detail and controls including appropriate risk assessments and mitigation plans could cause irreparable harm to the residents of Kanata Lakes and Beaverbrook. ClubLink is but one property owner among thousands in Kanata Lakes and Beaverbrook. Planning staff must recognize that acceptance of this inappropriate application will foist the values of one upon the thousands of people who live cohesively in our community and contribute to it daily.

In closing, we offer the following

“How many times can a life be split into a before and an after?”

— Jennifer E. Smith

Approval of this ClubLink/Minto/Richcraft proposal will irrevocably and permanently damage our environment and the neighbourhood function and livability of Kanata Lakes and Beaverbrook. This proposal requires any supporter or proponent to agree that the destruction of 70.9 hectares of immersive, protective and rewarding forests, streams and fens embedded in linked green and open space which has been shared with tens of thousands of families in the Kanata North community for almost 70 years, has no intrinsic value to the City or the existing community and, is worth only profit to ClubLink/Minto/Richcraft.

Supporting the proposal in its present form likewise requires any assessor to agree to risk public health and safety by: authorizing the necessary removal of incompletely assessed widespread heavy metal pollution as well as naturalized radon within the extensive bedrock topology, both of which are capable of contaminating the surrounding residential properties; increasing flood risk by authorizing substantial stormwater management system changes in an area rife with unresolved historic hydrologic concerns; weakening our City's ability to remain resilient in the face of climate change by approving a development plan consistent with our City policy.

There is no identifiable community need met by this unsolicited proposal. Further, there is no important community benefit or public good at its end. There is an abject lack of equity in this proposal – it drives windfall profit to these developers entirely at the expense of our City and community assets and leaves the community without improvement or benefit.

If this development proposal is accepted by the City of Ottawa, it will be that rare event in the lives of thousands and thousands of families in Beaverbrook and Kanata Lakes, that irrevocably distinguishes before from after. The community needs you to dismiss this resubmission.

We appreciate your time and consideration of our comments as well as your ongoing service to our community.

Sincerely,

B. Ramsay

Barbara Ramsay

Chair, Kanata Greenspace Protection Coalition

chair@ourkanatagreenspace.ca

ADDENDUM A

Technical Review of the Combined Environmental Impact Statement & Tree Conservation Report (Revised) Kanata Gold and Country Club Redevelopment, 7000 Campeau Drive, Ottawa by McKinley Environmental Solutions (herein after referred to as the McKinley report).

Prepared by E. B., M.Sc., R.P.Bio (#943)

For submission to Laurel McCreight, Planner, City of Ottawa

August 31, 2020

Please accept this technical review and assessment of Environmental Impact Statement report submitted by McKinley Environmental Solutions on behalf of the developers, Clublink, Minto and Richcraft. This review focuses on the sections pertaining to the environmental impact statements regarding wildlife in areas contained within the Greenspace of the Kanata Golf and Country Club lands being proposed for re-development.

The Environmental Impact Statement (EIS) is an assessment of the potential environmental impacts of a proposed project; in this case the proposal from Clublink and Minto/Richcraft to convert the greenspace into densified subdivisions. The basic principle of the EIS guidelines for the City of Ottawa are:

‘At minimum, the EIS must demonstrate that the proposed development or site alteration will have no negative impacts on the values or ecological functions for which the triggering environmentally significant lands or natural heritage features have been identified.’

The question of natural heritage is important. A natural heritage system, as defined by the Province of Ontario, includes working landscapes that enable ecological functions to continue. The greenspace on the Kanata Lakes Golf course land provides important supportive functions in the natural heritage system because they allow for species movement or feeding, or allow for the infiltration of water. These are part of the system and identified as ‘enhancement areas’. Given the extensive development of the areas within Ottawa’s urban boundary and particularly within Kanata, it would be wise to consider this greenspace as priority for stewardship best management practices or for ecological restoration over time. The focus of this report is the areas surrounding the northern pond. While the EIS applies to a much larger area overall, the comments and concerns in this review are applicable the report as a whole.

Wildlife

The McKinley report produced **a list of species but key information about occurrence was lacking**, as expected by the City of Ottawa in the Environmental Impact Statement Guidelines. No information about resident/visitor or evidence was provided.

The City of Ottawa’s Environmental Impact Statement Guidelines on pages 25-26, state that ‘The list should include all wildlife species known or suspected to occur in the vicinity of the property, and should indicate why it is believed to be present (e.g., direct observation, tracks seen, call heard, reported previously). Where possible, the EIS should specify whether the animal lives on the property or whether it is a visitor (e.g., looking for food or migrating through). The McKinley report produced a qualitative vague ‘snapshot’ of the greenspace status and it failed to capture the dynamics of the system. Monitoring trends over time are an important part of understanding future conditions and impacts to an ecosystem. In addition, the sampling times of the surveys did not include early mornings when wildlife is most likely to be active in the area.

For example, the report states that amphibians were surveyed according to the Marsh Monitoring Program, however, no trend or temporal analysis is possible because the survey was only done for one season. Monitoring amphibian populations through surveys requires multiple years for accuracy. A minimum of five years of controlled data studies are required to set monitoring thresholds.

Without temporal analysis, the McKinley report fails to answer key environmental impact questions:

- Is species richness changing over time in areas or overall for this greenspace?
- Is the total number of sites occupied by species groups (amphibians, mammals, birds, etc) changing over time in the greenspace?
- Is abundance changing over time?

The McKinley report states that the northern pond has less amphibians than natural wetlands:

‘The density of amphibian calling activity was very low in comparison to natural wetlands that are typically identified as SWH due to amphibian breeding. Although American Bullfrogs were observed calling in low densities, breeding activity was not directly observed, and no egg masses and/or tadpoles were noted. As such, breeding activity could not be confirmed... The Significant Wildlife Habitat Mitigation Support Tool (OMNRF 2014b, pg. 510) describes American Bullfrog breeding habitat as “...deep, permanent pools and ponds as well as lakes, preferably with abundant emergent plants for foraging and cover/protection.” The absence of emergent vegetation, the low density of American Bullfrog calling, and the artificial and highly disturbed nature of the ponds, suggests that it is unlikely that the features provide significant American Bullfrog breeding habitat functionality. As such, the stormwater management ponds should not qualify as SWH for breeding amphibians’

The assumption that the northern pond is not functional habitat for amphibians is incorrect. The shoreline has ample vegetation; the pond is a deep and has permanent water. The population of frogs is large enough to sustain a significant breeding habitat. There were substantial numbers of tadpoles observed earlier in the summer months; there is abundant aquatic vegetation within the water and the shoreline plants provided sufficient foraging and cover/protection to sustain 4 breeding pairs of Canada geese and their dozens of goslings as well as 2 breeding pairs of mallard ducks and their ducklings. Wading birds such as great blue herons, egrets and the black crowned night heron are a constant presence. (photos are attached below) Other birds not typical of urban environments have been observed during the summer months, including double crested cormorants and osprey.

Photos of the northern pond and select observed wildlife during morning hours between May and September 2020:



The McKinley report describes the vegetation surrounding the northern pond on Page 54 – section 3.4.2 Stormwater Ponds as ‘The majority of the pond edges appear to be regularly mowed, thereby limiting the growth of wetland plants.’ **This is not accurate.** The majority of northern pond shoreline has dense vegetation consisting of a variety of riparian and wetland plants. Note the photo below of the Great blue heron on the shoreline of the northern pond – September 1, 2020, taken at 8am.



On pages 56-57, the McKinley report discusses the observations regarding mammals from a site visit in winter (January 10, 2020). A few mammal tracks were observed and the assumption was made that red fox, white tailed deer, striped skunk and coyotes would be transient and sporadic. (The transient presence of Red Fox, White Tailed Deer, Striped Skunk, and/or Coyote is not sufficient for the Site to qualify as SWH under any of the other SWH categories (OMNRF 2014b). Other than a reference to winter deer yard requirements, no evidence was provided for this assumption. In fact, there is a constant coyote presence near the northern pond. Either observed directly or through the presence of scat and remnants of prey. This photo was taken on December 29, 2019 at 8:40am.



Another mammal that the McKinley report fails to mention is the river otter (*Lontra Canadensis*), which is also frequently present in the northern pond. See the photo below, taken in May 2020, at 8 am.



Bat Surveys

The McKinley report discusses bat surveys on page 67 (section 3.7.4 Bat Species at Risk) and acknowledges that the Little Brown Bat, Northern Long Eared Bat, Tricolored Bat, and Eastern Small Footed Myotis are all bat species which are listed as endangered in Ontario. All four (4) species have the potential to occur within the Ottawa area (SARO 2020).

The report states that ‘...no bats were observed foraging within the Site during the Amphibian Call Count Survey and the Eastern Whip Poor Will Call Survey, both of which were completed at night.’ – **This observation is not reliable.** The locations of these surveys were not selected for the purposes of observing bats therefore any observations would be incidental and cannot be viewed as confirmation of presence or absence of any bat species. It should be noted that bats are frequently observed foraging at dusk in the open greenspace between Goulding and Hallderson (near bird survey point B4). While no sites were found in January, the bats are present during the summer months, indicating that the survey results during the leaf-off period were inconclusive rather than nil. Bat surveys and data analysis should be conducted by a biologist experienced in bat identification and monitoring. Did the McKinley Environmental Solutions biologist meet this criteria?

Monarch Butterflies

On Page 73, the McKinley report discusses the potential presence of the Monarch butterfly, which is a species of special concern. In bullet 5 –

Monarch Butterfly: Monarch Butterflies are found in association with their Milkweed host plants (SARO 2020). Occurrences of Common Milkweed within the Site were

limited to the Deciduous Shrub Thicket (Community B). However, the density of Common Milkweed was not high, and no Monarch Butterflies were noted within the Site during surveying.

This survey observation is inaccurate. The vegetation surrounding the northern pond is rich with milkweed plants (see figure below). **Monarch butterflies have been observed nearby on multiple occasions by residents.**



Pond Ecosystem

The McKinley report refers to the northern pond and adjacent marshy area as ‘hydrated stormwater swales and the stormwater management (SWM) ponds’. These are terms used for development, but there are also natural terms for these areas and they are successfully performing a variety of functions. The vegetated buffers along the northern pond reduce the effects of the golf course land management by filtering pollutants, providing shade and bank stability, and reduce the velocity of stormwater runoff. Wetlands store and slow flood water and enhance water quality. Forested areas reduce and delay stormwater runoff by intercepting and

storing precipitation. In effect, the ecosystem is adapting and increasing in biodiversity as this greenspace has matured. The fact that there are amphibian populations within the pond attests to this because it is well known that amphibians are highly sensitive to pollutants such as pesticides. If the pond was simply a stormwater management area, the frogs would not survive there. Their presence is an indication that the northern pond is a healthy and maturing ecosystem. Long term monitoring to provide a temporal trend analysis is recommended.

Finally, the McKinley Report references a review by the local Conservation Authority (Last paragraph on page 52-53): 'The Mississippi Valley Conservation Authority (MVCA) was circulated as part of the development application review process. In their review comments, the MVCA confirmed that their mapping does not show the presence of any wetlands within the Site, and also that the MVCA has no concerns with respect to wetland features.' Did the MVCA do a site visit or did they rely on information provided by Clublink/McKinley? Please provide the review and comments from MVCA.

Review Conclusion

In conclusion, there are significant gaps in the observations and assessment report prepared by McKinley Environmental Solutions. The questions and concerns noted in this document should be addressed before approval of the Developer's environmental impact statement.

Finally, it is important to remember that the City of Kanata was built to integrate greenspace with the community. The golf course lands are a key part of this greenspace and over time they have matured and naturalized into a complex and unique ecosystem. The proposed subdivision development by Clublink, Minto and Richcraft will have a catastrophic impact on this environment, regardless of any statements their reports make.