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June 17, 2014

By E-Mail Only to jeffrey.abrams@vaughan.ca

Mr. Jeffrey Abrams, City Clerk
City of Vaughan
City Hall, Level 100
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Dear Mr. Abrams:

**Re: City of Vaughan Proposed Natural Heritage Network Study and
amendments to the Vaughan Official Plan 2010
Written Submissions Pursuant to s. 17(20) of the Planning Act
Block 27 Landowners Group Inc.**

As you are aware, we are Counsel to Block 27 Landowners Group Inc. ("Block 27"). Our client's lands are bounded by Teston Road on the south, Kirby Sideroad on the north, Keele Street on the east and Jane Street on the west.

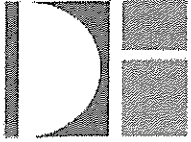
The purpose of this letter is to advise the City of Vaughan (the "City") of Block 27's concerns regarding the Proposed Natural Heritage Network Study (the "Proposed NHN") and amendments to the Vaughan Official Plan 2010 (the "Proposed OPA").

Our client is concerned that the new criteria in the Proposed OPA (Watercourses – s. 7.4 and Waterbodies – s. 7.5) create an inflexible regime reaching beyond the requirements of the Toronto and Region Conservation authority (TRCA) and contradicts the existing VOP 2010 policies. To this end, Block 27 questions the need for 30-metre wide vegetation protection zones being added to either side of the high water mark of *all* watercourses.

Block 27 also disputes the City's "precautionary" approach which identifies all watercourses as Core Features until they have been assessed in the field and confirmed by the City and TRCA. As the City is aware, it is commonly accepted that the only way to determine whether a watercourse should be considered "core"

Please refer to: **Jason Lewis**
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File No. 702275

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COMMUNICATION	
CW (PH)	JUNE 17/14
ITEM -	6



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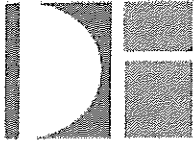
is through field investigation. While the City's consultants have performed field investigations on the Block 27 lands, the designation of several water features as Core Features on Schedule 2 is not supported by their raw data. Block 27 would suggest that this approach is prejudicial, not precautionary.

Block 27 is also concerned that much of the information that it provided to the City as part of the NHN exercise has not been considered. For example, Block 27 agreed to provide the City with the results of its Headwater Drainage Feature assessment prepared by Beacon Environmental in 2013 (the "HDF Assessment") with the understanding that the HDF Assessment would inform the City's determination of watercourse Core Features. Our examination of revised Schedule 2, shows that the data in the HDF Assessment was not faithfully incorporated into the City's final determination even though the City's data was generally consistent with Beacon's data.

The Proposed NHN recommends that Core Features include "all natural waterbodies" and that a 30m vegetation protection zone (VPZ) be added to the high water mark. Although waterbodies are not defined or included in VOP 2010, our interpretation is that farm ponds with limited ecological function would be excluded from this designation. Nevertheless, there are two dug farm ponds on Block 27 which are mapped as Core Features with 30m VPZ's surrounding them resulting in situations where the VPZ is much larger than the ponds themselves.

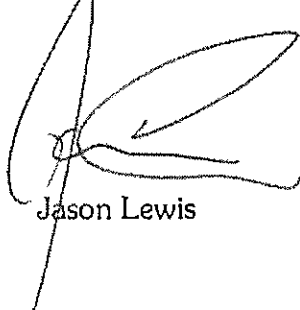
Finally, there are two small areas shown as "Core" on the west side of Block 27 that do not appear to correspond to the presence of any actual features. There is also no information depicted in Schedules 2a, 2b, or 2c to indicate what these areas are intended to represent. These appear to be erroneously mapped and should be removed. To this end, we suggest that further review of the Schedules is required before they are adopted by the City.

We trust this is satisfactory. Please do not hesitate in contacting us should you require anything further.



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Yours truly,
DAVIESHOWEPARTNERSLLP



Jason Lewis

copy: Block 27 Landowners
John MacKenzie
Grant Uyeyma
Tony Iacobelli