

LOOPSTRA NIXON LLP

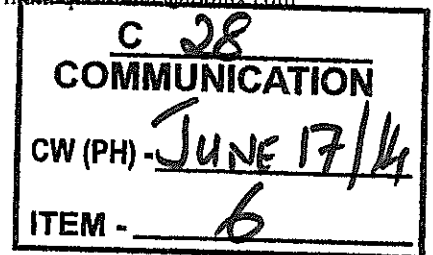
BARRISTERS AND SOLICITORS

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June 17, 2014

By E-Mail

Mayor Maurizio Bevilacqua and Members of Council
City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1



Dear Mayor and Members of Council:

**Re: Submission Respecting the Natural Heritage Network Study Public Meeting
Eugene and Lillian Iacobelli
Part of the East Half of Lot 17, Concession 3, in the City of Vaughan, Part 1 on
Plan 65R-29377**

I am the solicitor for Eugene and Lillian Iacobelli (the "Iacobelli's") in the matter referenced above. The Iacobelli's are the owners of approximately 4.5 hectares of land in the City of Vaughan, legally described as Part of the East Half of Lot 17, Concession 3, in the City of Vaughan, Part 1 on Plan 65R-29377 ("Subject Property").

I have reviewed the Natural Heritage Network data and documentation as it relates to the Subject Property. I recognize that the current data and documentation, including the proposed revisions to the Vaughan Official Plan, 2010, are currently in draft form and I look forward to working with the City to correct the obvious errors therein.

It is clear that the Natural Heritage Network data and documentation does not represent the current site conditions of the Subject Property and as a result, my client cannot support the NHN Study, nor the proposed amendments to the Vaughan Official Plan 2010, at this time. To the best of my knowledge, no core feature has been identified as being located on the Subject Property through the NHN Study process except for the possible location of a small surface water feature which encompasses a very small area of the Subject Property. Despite this, the whole of the Subject Property (with the exception of a very small piece) is identified as a Core Feature on the proposed revision to Schedule 2, Natural Heritage Network.

It appears that rather than relying on field investigations, aerial photography, and up to date GIS Mapping to "determine the precise limits of natural heritage features", city staff has relied on previous approvals, misinformation, and a misinterpretation of the law to support the current NHN Study mapping. When undertaking such an ambitious project, it is understandable that mistakes can be made. It is my hope that we can be of assistance to the City to correct this error which has caused my client much prejudice before Council approves the proposed amendments.



Field investigations of the subject property have confirmed the lack of natural heritage features on the majority of the Subject Property. The proposed revisions to the Vaughan Official Plan, 2010, should reflect these existing site conditions.

Please accept this letter as a formal request for a meeting to discuss the errors in the current NHN Study documentation and data and how said errors can be resolve. I look forward to working with the City on this very important matter.

Please contact the undersigned or Steven C. Ferri of this office to set a time schedule a meeting or to discuss this matter further. Also, please copy Mr. Ferri on all correspondence respecting this matter (sferri@loonix.com/416-748-4752).

Yours truly,

LOOPSTRA NIXON LLP

Per:

A handwritten signature in black ink, appearing to be 'Q. Annibale'.

Quinto M. Annibale

cc Jeffrey A. Abrams, City Clerk
cc John MacKenzie, Commissioner of Planning
cc Tony Iacobelli, Senior Environmental Planner
cc Client

QMA/scf