TOWN OF CALEDON
PLANNING
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Town of Caledon
Planning Department

Attention: Jason Elliott, Senior Planner, Environment - Parks and Natural Heritage

RE: Wildfield Village Local Subwatershed Study – Natural Heritage Comments, Linkages and Enhancements

This technical letter report has been prepared by GEI Consultants Canada Ltd. (GEI), to address comments related to linkages and enhancements from the Town of Caledon dated March 21, 2025, in response to the first submission of the Phase 1 and 2 Local Subwatershed Study (LSS). These comments generally relate to the interpretation of the SABE Scoped Subwatershed Study (SWS) (Part A, B, C; Woods et al, 2022) as it pertains to linkages and enhancements.

	Comments re: Local Subwatershed Study Phase 1 Report (March 2025)
#57 - **Linkages**	*"It is inaccurately indicated that the preliminary NHS represents an interconnected system of natural features given the central woodland/Provincially Significant Wetland is proposed to be isolated from any other natural feature by approximately 500m. Due to the proposed development, this includes a substantial reduction in existing connectivity permitted by the landscape permeable agricultural lands. As outlined in the SABE SWS, the objective of ensuring a connecting NHS that can support existing functions under a developed land use scenario is to be provided. Further, the preliminary NHS omits the SABE Preliminary NHS Conceptual Linkages mapped in the NHSA. These linkages were identified conceptually due to uncertainty in terms of location or alignment and/or type, must be confirmed/refined through the LSS and included in the NHS."*
#57 - **Enhancements**	*Additionally, the preliminary enhancement areas identified in the SABE SWS and the associated increase in natural cover target must be assessed/provided and included in the NHS. Complete the analyses and revise the preliminary NHS accordingly.*
#59 – **Minimum Buffers**	*The discussion on minimum buffer widths in Future Caledon is not fulsome. While it is accurate that the prescribed minimum buffer widths do not strictly apply in the new urban area, it is the expectation that they will be used as a guide with potential additions/reductions based on factors contained within Policies 13.9.4 and 13.9.6.*

As part of this review, SGL and GEI note that the Future Caledon Official Plan (Draft OP, 2024) Section 13.9 notes that the SABE Scoped SWS provides a series of recommendations that are expected to be reviewed and refined as part of the LSS. There are no explicit natural heritage targets defined in the Future Caledon OP and the Official Plan notes that the natural features and areas identified in the SABE Scoped SWS are not designations but are intended to inform the preparation of more detailed studies. As such, it is the intent of the LSS to review these recommendations in the context of existing conditions and the density and growth targets for the Town's New Urban Areas to assess whether recommendations are feasible, and where they are not feasible, to provide alternatives to maintain a no-net loss natural heritage system for

the Study Area. As detailed in **Section 1.0, it is GEI's opinion that the conceptual linkages noted in the Future Caledon Official Plan and SABE Scoped SWS are not required.** The Wildfield Village Secondary Plan area has been farmed for over 70 years, with only small and scattered natural heritage features remaining. This memo describes how the existing natural heritage features and their functions can be maintained and enhanced without the need for new linkages created. Alternative enhancement and restoration measures are expected to support the long-term sustainability of the NHS and include habitat creation for wildlife adjacent to existing linkages and enhancement of stepping-stone habitat through strategic buffer plantings, restoration, and wildlife enhancement efforts within the minimum VPZs. It is also important to note that the proposed NHS provides two alternative site-scale linkages, as shown in **Figure 1**.

As described in **Section 2.0**, **it is GEI's opinion that several of the preliminary enhancement areas noted in the SABE Scoped SWS are not required,** as alternative enhancements are provided to promote a net ecological gain for the Study Area's NHS. **Three of the preliminary enhancement areas may be feasible and include:** Shape/Size/Contiguity Enhancement #E227 (**Figure 1**); a floodplain enhancement associated with the anticipated watercourse east of The Gore Road that is intended to be protected in place with vegetated buffers; and enhancement of the agricultural lands within the Greenbelt, located immediately east of the Study Area.

Further described in **Section 2.0** and shown on **Figure 2, the letter report details how the SABE Scoped SWS target of a 30% increase in Natural Cover can be met through the proposed NHS with vegetated compensation areas and feature buffers.**

Section 3.0 notes that as per the policies in the Future Caledon Official Plan, **the Wildlife Village Study Area is located within a 'New Community Area' and is therefore not subject to the minimum buffers listed in Table 13.3 of the OP. Instead, minimum buffers have been assessed and proposed in the updated LSS based on feature sensitivity.**

1.0 Conceptual Linkages

GEI has completed a detailed review of the SABE Scoped Subwatershed Study (SWS) Part B (Woods et al, 2022) and the Future Caledon Official Plan (Draft OP, 2024) as it relates to policies and considerations for conceptual linkages. Section 13.9 of the Future Caledon OP notes the Region's Scoped SWS includes a Preliminary Natural Environment System for New Community Areas. Apart from Natural Features and Areas and Supporting Features and Areas, the schedules identify other features, buffers, potential linkages and potential enhancement areas. Section 13.9 specifically notes that "these additional areas are not designations but are intended to inform the preparation of more detailed studies, which will result in the designation and protection of certain areas". As per both the Draft OP and SABE Scoped Subwatershed Study, it is expected that future work, such as the LSS, will further refine the proposed conceptual linkages as warranted_(as detailed below, GEI has determined that the two Conceptual Linkages shown for the Wildfield Village Secondary Plan Area are not required). This should include an assessment of feasibility and ecological functions and should be framed in the context of achieving the goals of SABE areas in establishing viable, walkable and transit supportive New Urban areas and connecting existing or Planned Greenlands Networks outside of the Caledon Future Settlement Area (FSA).

Policy 13.9.2 of the Future Caledon OP notes the Natural Environment System in New Community Areas will be guided by a net benefit mitigation hierarchy. Based on this and the field results for the Wildlife Village Secondary Plan Area (herein referred to as the Study Area), GEI has prepared a detailed assessment regarding the feasibility and functionality of the two conceptual linkages as proposed in the SABE SWS (L06 and L07 – Figure DA2-10) as detailed in **Table 1,** and as depicted in **Figure 1**. From an ecological perspective, the potential linkage spans across several secondary plans through existing farm fields with few intervening significant natural features. From a land use perspective, such a linkage is not needed and would result in the loss of a significant amount of residential lands and fragment numerous residential neighbourhoods. The ecological benefit verses the impact on housing supply and neighbourhood connectivity is dubious.

1.1 Existing Conditions

The Study Area is situated in the West – Main Branch Humber River secondary subwatershed unit (TRCA 2008) which is characterized as containing little habitat with small, fragmented patches that are mostly constrained to valley corridors and tableland forests (TRCA 2008). Figure 3-11 (Terrestrial System – Existing Conditions Landscape Analysis) of the Humber River Watershed Plan (TRCA 2008) displays the habitat patch quality of the identified natural heritage features within the NHSA as a mix of fair and poor.

Based on the existing conditions as defined in Phase 1 LSS, through the detailed background review and fulsome ecological field studies, the Study Area has been characterized as having few natural heritage features that are generally disconnected from each other. The Study Area is dominated by active agricultural lands with scattered small and isolated marsh wetlands, as well as a deciduous swamp (PSW) and cultural woodland (significant woodland) located in the south-central area. There are also small and isolated cultural woodlands and thickets, as well as linear systems of marshes and wet meadows along some of the tributaries and drainage features.

The following is a summary of natural heritage features present within the general vicinity of conceptual linkages L06 and L07 shown on **Figure 1**:

1. L06
    - South-central woodland/wetland complex which includes:
        - Significant Wetland (SWD3-2);
        - Other Wetland (MAS2-1);
        - Significant Woodland (CUW1);
        - Significant Wildlife Habitat (SWH):
            1. Turtle Overwintering Area within MAS2-1 (wetland 34) which will be protected by a 10 m vegetated buffer;
            2. Habitat for Species of Conservation Concern including Terrestrial Crayfish (within SWD3-2 [wetland 8_9], protected by a 30 m vegetated buffer), Wood Thrush (within SWD3-2/CUW1, protected by a 30 m wetland vegetated buffer and 10 m woodland vegetated buffer); and
            3. Candidate Turtle Overwintering Area within SA (wetland 33) which will be protected by a 10-30 m vegetated buffer (depending upon wetland significance).

- Candidate Significant Wetland (SA); and
- Two small unevaluated wetlands on non-participating properties, will not be retained, pending further studies;

2. L07
    - Headwater drainage feature H1S1, characterized in the LSS as ploughed-through and planted in row crops, with ephemeral hydrological functions.
    - Headwater drainage feature H1S3, characterized as having disturbed riparian habitat within an agricultural field, and with anticipated ephemeral hydrological functions (due to downstream observations at H1S1).
    - Two non-significant wetlands (<0.5 ha), providing limited ecological functions (no calling amphibians, common and secure bird and plant species).

Table 1 provides details regarding the specific natural heritage features and their functions, and how they can be maintained without a linkage. A summary of these findings is also provided below.

1.2 Connectivity

It is acknowledged that as any designated settlement area transitions to urbanization, the natural landscape will be subject to increased fragmentation. Under existing conditions within the Study Area, as noted above, the area contains limited natural heritage features which currently exist in isolation within actively cultivated agricultural lands.

It is acknowledged that agricultural fields may provide some landscape permeability and that they are able to support more connectivity than developed areas (as described in the Phase B SABE Scoped SWS through the Circuitscape habitat connectivity assessments). However, active agriculture is not considered a key or significant linkage feature. Literature demonstrates that the type of agricultural use and intensity is a large factor in the ability of wildlife to move across the landscape. As an example, across the U.S., the most intensively cropped landscapes (i.e., farming relying on the mechanization of processes like chemical fertilizers, pesticides etc.) correlated with a relatively high challenge to movement and relatively low connectivity, while regions with more extensive grazing lands (lower intensity practices) exhibited less challenges to movement and was characterized by diffused but relatively high flow of wildlife (Suraci J.P., et al. 2023). The Wildfield Village LSS Study Area is characterized by intensive cash crop farming, suggesting that the landscape linkage potential is relatively low with the application of intensive farming practices (i.e., tilling, application of chemical fertilizers etc.) that likely impede wildlife movement at various seasonal periods across the active season.

It is GEI's opinion that the recommendations outlined in both the SABE Scoped SWS and Future Caledon OP are not requesting that a linkage be maintained, but instead encourage new linkages be created in this area if possible.

GEI has identified two existing linkages within the Study Area, described later in this memo, that, together with other restoration and enhancement works within the Study Area, are expected to provide linkage between habitats and maintain existing ecological functions without requiring the creation of new linkages.

As it relates to the agency comment "*Due to the proposed development, this includes a substantial reduction in existing connectivity permitted by the landscape permeable agricultural lands,"* it is GEI's opinion that there are alternatives to delivering a new, purpose-built linkage corridor that can support wildlife habitat connectivity within the Study Area that are designed to enhance the functions of existing natural heritage features. This may include:

- Habitat creation for wildlife species adjacent to existing linkages within and adjacent to the Study Area (proposed compensation areas; **Figure 1**); and
- Enhancement of stepping-stone habitat through strategic buffer plantings, restoration, and wildlife enhancement efforts within the minimum VPZs to support biodiversity (e.g. foraging areas, pollinator habitat etc.).

The following sections provide an assessment of the 'conceptual linkages', an assessment of existing linkages within the Study Area, compensation areas, and enhancements, and provide recommendations for a comprehensive NHS within the Study Area, exclusive of the conceptual linkages.

1.3 Policy Review – Conceptual Linkages

Future Caledon Official Plan (Draft OP, 2024)

As outlined in the Future Caledon Draft OP, Section 13.1 outlines natural heritage planning objectives, and recognizes the purpose of linkages to provide connection points between and among features and supporting features.

Sections 13.4.12 – 13.4.15 reference a process for assessing linkages as depicted within Draft OP schedules, to determine whether a linkage should be classified as a supporting feature within the NHS.

Additionally, the elimination of a linkage as shown in Schedule D2b 'New Urban Area Preliminary Natural Environment System' (Future Caledon, 2024) is permissible if the following conditions can be met:

a.) "maintaining a linkage is not necessary for ecological reasons;
b.) the loss of the linkage will not decrease the overall ecological connectivity in the area; and
c.) the linkage is not required to support the long-term sustainability of the overall Natural Environment System". (Section 13.4.15).

As per Schedule D2b, only one conceptual linkage ('potential linkage') is proposed to provide a connection between the Greenlands system south of Mayfield Road, and the Greenbelt Plan Area northeast of Healey Road.

SABE Scoped SWS: Conceptual Linkages

As outlined in the SABE Part B Scoped SWS, the purpose of a 'conceptual linkage' is as follows:

1. "To recognize connections to existing or planned Peel Greenlands Network corridors outside of the FSA for which further assessment is required to determine the appropriate linkage type (e.g., as a Local Landscape Linkage or Site-Scale Linkage) and final alignment; and/or
2. Linkages that should be recognized through the current study, but whose location, alignment and type will be informed by detailed study. For example, a connection to a linkage of the Greenlands System south of the FSA, or where information on features (e.g., a Headwater Drainage Feature) is required to inform alignment. These conceptual linkages have been mapped to ensure continuity from the current scoped Subwatershed Study and future land use planning and studies." (Section 2.6.3.1).

It is understood that the intent of linkages is to provide a more "connected NHS that can support existing functions under a developed land use scenario." As outlined below, these conceptual linkages are not required for Wildfield Village given that the natural heritage features and their functions will be maintained and enhanced through the proposed NHS, which also includes two existing site-scale linkages.

As noted previously, as per the SABE Scoped SWS, there are two conceptual linkages contemplated within the Study Area: L06 and L07 (DA2-10 'Preliminary Natural Heritage System and Landscape Linkages') (**Figure 1**).

The following subsections provide a review of the conceptual linkages based on the evaluation criteria and definitions from the Future Caledon OP and the SABE Scoped SWS.

Conceptual Linkage L07

As per Schedule D2b, conceptual linkage L07 ('potential linkage') is proposed to provide a connection between the Greenlands system south of Mayfield Road, and the Greenbelt Plan Area northeast of Healey Road. As noted in Section 1.2 of this technical memo, it is GEI's opinion that this is a request to create a new linkage, not to maintain an existing linkage.

Based on the criteria from 13.4.15, the OP linkage evaluation criteria were applied to assess this conceptual linkage within the Study Area (**Table 1**). There are more detailed analyses included in **Table 1**, but overall, this conceptual linkage is not recommended based on the following conclusion:

- There is no existing linkage associated with the location of conceptual L07 linkage. The southern portion on participating lands is a regularly ploughed-through HDF that is planted in row crops; the north portion on non-participating lands is a disturbed area – as outlined in the LSS. Based on historical imagery review, there is evidence of active agriculture use in this area dating back to 1945 (**Image 1, below**), while there has been some variability in the vegetative state of this feature over the years based on farming practices (**Image 2, below**), Google Earth imagery indicates it has been tilled as of June 2020 onwards and today presents no evidence of riparian vegetation or cover that would provide refuge for wildlife movement (**Image 3, 4 below**).

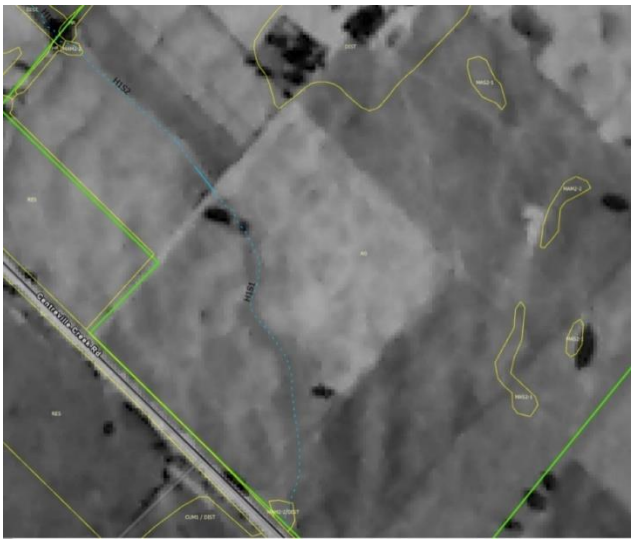


Image 1 – Aerial Imagery of H1S1 in 1954 showing no apparent riparian vegetation along the HDF – instead, the area is characterized by active agriculture (University of Toronto Map Database, 1954).



Image 2 – Aerial Imagery of H1S1 in 2016 showing riparian vegetation, with plowed/active row crop agriculture extending to the edge of this vegetation (Peel Region, 2016)



Image 3 – Aerial Imagery from 2021 showing no mappable riparian vegetation; the area is characterized by active agriculture and has been plowed through (Peel Region, 2021)



Image 4 – Aerial Imagery from 2024 showing no mappable riparian vegetation; the area is characterized by active agriculture and has been plowed through (Peel Region 2024)

- No significant habitat was identified within the conceptual L07 linkage. Two small (<0.05 ha) marsh wetlands are associated with HDF H1S1. These features provide limited ecological function (no calling amphibians, common and secure birds and vegetation);
- Creation of a new linkage to align with conceptual L07 is only associated with two small wetlands (<0.5 ha) which are proposed to be removed and compensated for as part of a larger wetland creation project (Wetland Relocation and Compensation Area; **Figure 1**); and
- There are no ecological reasons to support connectivity northwards particularly as any linkage in this area would be restricted to the north by the proposed Highway 413 alignment, ultimately providing limited function.

As such:

- Maintaining a linkage at L07 has been determined to not be necessary ecologically;
- This linkage is not considered a loss as it does not currently exist within the active agricultural landscape, this area provides no significant wildlife habitat, and Wetland Relocation and Compensation Area (Figure 1) will result in improved conditions at the southern portion of this conceptual L07 linkage – so no decrease in overall ecological connectivity is expected;
    - Additionally, it is expected that the compensation area will result in an overall increase in habitat connectivity with the riparian wetland /watercourse corridor immediately downstream of Centreville Creek Rd; and
- The conceptual linkage, as per the SABE Scoped SWS, is not required to support the long-term sustainability of the overall Natural Environment System (NES) – alternative enhancement and restoration measures are expected to support the long-term sustainability of the NES.

Instead, as discussed further in **Table 1**, the Wetland Relocation and Compensation Area will provide a contiguous wetland feature with a connection downstream of Centreville Creek Road, creating a linkage between habitats within and adjacent to the Study Area.

In the SABE Scoped SWS, this conceptual linkage L07 was identified as 'recommended' – not required. It was recommended for further review to determine the feasibility of connecting the West Humber Valley to the south, and the Greenbelt Plan NHS to the north. In general, as outlined in **Table 1**, it is recommended that alternative ecological enhancement measures supporting connectivity be implemented as opposed to creating new linkages across the Study Area. Instead, GEI recommends focusing on maintenance of existing north/south corridors present elsewhere, including the existing north-south feature/site-scale linkage (Watercourse/HDF WT2(1)1-1) within the Study Area, just east of The Gore Road and the major landscape scale linkage on adjacent lands further east associated with the West Humber River and the Greenbelt Plan Area.

Additionally, in reviewing potential constraints associated with L07, the northern portion of the Study Area is generally bound by the proposed Highway 413 alignment (**Figure 1**). This alignment is expected to cause a substantial barrier to movement. While detailed studies as part of the Highway 413 Project Environmental Assessment (EA) (GTA West Route Planning Study Area) are still underway, a desktop Draft Overview of Environmental Conditions and Constraints (AECOM, MMM Group, MTO; June, 2015) did not identify the SABE conceptual linkages or associated features as potential constraints within the GTA West Route Planning Study Area. This report did however identify fish habitat associated with the West Humber River tributary within the Greenbelt Plan Area east of the Wildfield Village Study Area (i.e. the major landscape linkage identified within the SABE Scoped SWS). As the EA study is still ongoing, it is unclear how wildlife passages will be maintained north and south of the proposed Highway 413 alignment. However, it would be expected that as the EA for Highway 413 moves forward, an assessment of preferred design considerations would be completed to support wildlife movement within the Greenbelt NHS corridor as occupied fish habitat and part of a provincial NHS. As these EA studies progress, design considerations would likely align with best practices detailed in the Environmental Guide for Mitigation Road Impacts to Wildlife (MTO, 2017) to accommodate for the ecological effects of habitat fragmentation, barrier effects, habitat loss and wildlife-vehicle collisions.

In general, within the Study Area itself, site-scale linkages (as defined below) are anticipated to support more localized movement to the south, away from the proposed highway (e.g. Wetland Relocation and Compensation Area; **Figure 1**).

Conceptual Linkage L06

Conceptual linkage (L06) (as shown in the SABE Scoped SWS) is not contemplated in the Future Caledon OP, the policies of Section 13.4.12-13.4.15 should not apply. However, for this L06 conceptual linkage, GEI does offer that there is no existing natural heritage linkage apparent within the Study Area in the area where L06 is contemplated. While there are several natural heritage features located within the conceptual L06 linkage, the analysis in **Table 1** also offers rationale for why L06 is not necessary ecologically, how it will not decrease overall ecological connectivity, and why it is not needed to support the overall function of the NES within the Study Area.

In the SABE Scoped SWS, this conceptual linkage L06 was *'strongly recommended'.* It then notes that

"further detail is needed to confirm:

a) features present on the landscape that can be utilized to support a linkage

b) how system connectivity can be best achieved to support ecological form and function,

c) what type of linkage would be appropriate (e.g., Major or Local Landscape Scale),

d) feasibility with regards to broad land use planning and long-term function of the system".

In general, a review of these details is included in **Table 1**. Ultimately, there are limited existing natural heritage features that would support a linkage where L06 has been contemplated within the SABE. Instead, GEI recommends that alternative ecological enhancement measures supporting connectivity be implemented as opposed to creating a new linkage across the Study Area.

Feature/Site-Scale Linkage Assessment

While the two conceptual linkages (L06/L07) have been identified as not necessary within the Study Area, GEI's linkage assessment has identified two features that meet the SABE criteria for a feature/site-scale linkage (**Figure 1**).

Site-scale Linkage 1: Watercourse H5S1/S2/S3

This linkage has an average width of approximately 45 m, is 275 m long, and is comprised of the H5S1/S2/S3 watercourse and the associated riparian meadow marsh located within the southeastern corner of the property. This linkage is intended to be retained and enhanced with a fish habitat compensation area at the upstream limits of this watercourse and provides connectivity to the West Humber River valley system (**Figure 1**).

Site-scale Linkage 2: Watercourse/HDF WT2(1)1-1

A north-south linkage surrounding WT2(1)1-1 is located on non-participating lands east of The Gore Road has an average width of 76 m and extends approximately 1,230 m where it flows into the West Humber River at the southern limits. GEI conducted a desktop assessment and found WT2(1)1-1 to have characteristics of a watercourse as it had a clear and defined flow pathway in aerial imagery, provided by First Base Solutions. LiDAR-derived elevation data from the Ontario Digital Terrain Model (DTM), available through the Ontario GeoHub, also revealed an identifiable depression with discernible bed and banks along the feature. The characterization will need to be completed in the field when site access is available.

The features within the linkage have been afforded a 30 m buffer (unevaluated wetlands, potential watercourse/fish habitat). The corridor is also inclusive of the estimated floodlines and 10 m setback. Through riparian buffer restoration, and a recommended linkage enhancement area (**Figure 1**), it is expected that this feature will contribute to an enhanced movement corridor within the Study Area's NHS providing important connectivity between the northeast and southeast portions of the Greenbelt NHS and West Humber River valley.

These existing linkages are expected to provide important connectivity functions that align with the definitions and expectations of linkages as outlined in both the SABE Scoped SWS and the Future Caledon OP.

Table 1: Conceptual Linkage Evaluation – Wildfield Village Local Subwatershed Study Area

Conceptual Linkage	Policy Evaluation	Ecological Evaluation	Recommendation
L06 (east-west linkage to connect western Greenlands to Greenbelt NHS east of Study Area) - DA2-12 (SABE SWS Part B, 2022)	This feature is not contemplated within the Future Caledon Official Plan (Schedule D2b). This feature is proposed as a "strongly recommended" linkage within SABE Part B Scoped SWS: As per Table 2.6.3.6 of the SABE Part B Scoped SWS: "*L06 – 'strongly recommended'* *Due to low presence of existing features on the landscape and that the current study is a Scoped SWS (existing information, no field surveys); further detail is needed to confirm* *a) features present on the landscape that can be utilized to support a linkage* *b) how system connectivity can be best achieved to support ecological form and function,* *c) what type of linkage would be appropriate (e.g., Major or Local Landscape Scale),* *d) feasibility with regards to broad land use planning and long-term function of the system*" Despite the recommendations from the SABE Study, field investigations have identified minimal features/ functions associated with the proposed L06 link east and west of central wetland features. The proposed corridor spans existing residential and managed agricultural areas to the east and west. As such, the delivery of this conceptual linkage would require substantial efforts to create a linkage feature, which require substantial loss of area to support secondary plan targets, including a large loss in developable area required to meet settlement area expansion goals for neighbourhood uses.	It appears that L06 was recommended based on analyses completed in Circuitscape that relies on agriculture to support wildlife movement across a landscape. Based on existing conditions of the Study Area, the site is generally disconnected with minimal natural heritage features – the area is predominately characterized by actively cultivated row crops. As it relates to part "a" of the rationale for this conceptual linkage, there are no features present that can be utilized to support a linkage. Instead, form and function of existing features can be maintained through alternative measures aimed to continue to support wildlife habitat and other long-term ecological functions. L06 is comprised of two small (0.06 ha and 0.61 ha) and isolated marsh wetlands (located on non-participating properties), as well as the south-central woodland/PSW (primarily located on participating properties). Based on ecological field assessments, the woodland provides habitat for: **Turtles**: GEI observed seven Midland Painted Turtles in the small MAS2-1 Cattail Shallow Marsh located in the south-east corner of the south-central woodland, which meets the criteria for Turtle Overwintering Area Significant Wildlife Habitat (SWH). It is also acknowledged that the SA wetland on non-participating lands in the northwest corner of the woodland has potential to provide Turtle Overwintering Area SWH.	<u>No linkage required.</u> To support existing natural heritage features, the following actions are recommended: 1. Wildlife habitat enhancement areas adjacent to the south-central woodland/wetland to create suitable supporting habitat for existing wildlife (e.g. turtle nesting habitat enhancements, vegetation plantings to support pollinators and foraging habitat for wildlife. It is GEI's opinion that the L06 linkage does not reasonably exist in the current landscape, and that the scale of linkage proposed to be created in the SABE Scoped SWS is not necessary to maintain the ecological integrity of existing natural heritage features. It is also GEI's opinion that the two existing site/feature-scale linkages (Figure 1) will provide important habitat connectivity. These features will be maintained on-site.

Conceptual Linkage	Policy Evaluation	Ecological Evaluation	Recommendation
	Additionally, as this conceptual linkage is not included within Schedule D2b of the Future Caledon OP, the requirements to review linkages as per the criteria in 13.4.12 evaluation generally should not apply.	To mitigate potential impacts, the proposed NHS will include all necessary habitats (overwintering, nesting, and the general active seasonal habitats that often overlap with the features supporting overwintering) within the buffers/setbacks/VPZ of the feature. No negative impacts are expected to turtle habitat with or without a created linkage. **Birds**: One Wood Thrush was observed calling from the south-central wooded feature. However, the habitat is atypically small for this species. They generally prefer larger forests with associated interior forest (NHRM, 2005). Creating conceptual L06 linkage is not anticipated to provide any net benefits to Wood Thrush or other bird species that prefer interior forest habitat. As the woodland is proposed to be retained, in-situ with naturalized buffers, no negative impacts are expected to bird habitat with or without a created linkage. **Terrestrial Crayfish**: This SWH was observed in the SWD3-2 (Provincially Significant Wetland - PSW). The PSW is protected with a 30 m buffer. Additionally, based on the post development augmentation of clean water inputs to this wetland based on the overall site groundwater balance and the feature-based water balance assessment it is anticipated groundwater and surface water inputs will continue to support this species. Based on this, no negative impact to Crayfish SWH is expected if a linkage is not created.	

Conceptual Linkage	Policy Evaluation	Ecological Evaluation	Recommendation
		Provided these recommendations are implemented, GEI is of the opinion that the south-central woodland/PSW and its functions will be maintained, and enhanced through naturalized buffer plantings, without establishment of the L06 conceptual linkage as shown in the SABE SWS.	
L07 (connection proposed between Greenlands system to the south and Greenbelt NHS to the north) – DA2-12 (SABE SWS Part B, 2022) and Schedule X (Draft Caledon OP, 2024)	This conceptual linkage has been illustrated in the Future Caledon OP, and as such an analysis of whether it meets the criteria for the removal of a mapped linkage as per Section 13.4.15 has been completed. However, GEI's opinion is that this linkage does not exist under current conditions and is not necessary. L07 – 'linkage recommended' "provides an opportunity to connect to the West Humber Valley and into the Greenbelt Plan NHS north of the FSA (outside of study area)." "Further information on the features and functions present in this valleyland / watercourse corridor is required to inform the type of linkage that should be established" Ecological analyses have determined this feature does not exist within the current landscape, and that a connection to the Greenbelt Plan NHS north of the FSA is not feasible due to the proposed Highway 413 alignment.	Historically, the HDFs (H1S1 and H1S3) associated with this conceptual linkage had some riparian cover but because of the current agricultural uses, this feature is regularly plowed to support row crops and would not be considered a linkage under existing conditions. L07 is comprised of two small (0.05 ha and 0.2 ha) and isolated marsh wetlands. These small features provide limited wildlife habitat (no calling amphibians, common and secure bird species) and are proposed to be removed and compensated as part of the Wetland Relocation and Compensation Area (**Figure 1**). This compensatory wetland is anticipated to provide an overall net gain to the Study Area's NHS by providing more contiguous wetland habitat. Additional net gain benefits are discussed in **Section 2** of this memo. This future wetland will also provide downstream hydrologic connectivity through the culvert at Centreville Creek Road to support movement to the west of the Study Area. No negative impacts to these features and functions are anticipated by not creating linkage L07. Based on ecological field assessments, the following wildlife habitat was identified:	<u>No linkage required.</u> Primarily, the SABE's goal to connect northward to the Greenbelt System is not feasible due to the construction of the future Highway 413. However, the LSS recommends the creation of a consolidated wetland compensation feature adjacent to Centreville Creek Road that will provide an improved wetland system to support a variety of wildlife and increased ecological and hydrological functions. This will provide additional landscape linkage to features downstream of Centreville Creek Road.

Conceptual Linkage	Policy Evaluation	Ecological Evaluation	Recommendation
		Birds: L07 is not expected to provide any support/ assistance to bird species observed within the Study Area in a post-development scenario. A corridor may provide habitat for common species that are already able to adapt to heavy human presence (i.e. robins, cardinals, mourning doves etc.). As such, there is no expected negative impact to not creating linkage L07. Instead, stepping stone habitats associated with buffer plantings, landscaping, and feature compensation efforts are expected to maintain existing bird biodiversity within the Study Area. While it is GEI's opinion that this linkage does not exist under current conditions, the following conditions under the Future Caledon OP have been met to remove this conceptual linkage, based on the above assessment: • Maintaining a linkage is not necessary for ecological reasons; • The loss of the linkage will not decrease the overall ecological connectivity in the area; • The linkage is not required to support the long-term sustainability of the overall Natural Environment System.	

2.0 Enhancements

The SABE Scoped SWS proposed preliminary enhancement areas for review as part of a LSS or similar study. The Town offered the following comment in relation to enhancement areas and SABE Scoped SWS targets:

"*Additionally, the preliminary enhancement areas identified in the SABE SWS and the associated increase in natural cover target must be assessed/provided and included in the NHS. Complete the analyses and revise the preliminary NHS accordingly.*"

GEI has reviewed the suggested enhancement areas as outlined in DA2-11c (**Figure 1**); a review of these is found in **Table 2**.

Table 2: Enhancement Evaluation – Wildfield Village Local Subwatershed Study Area

Enhancement Feature Type	Feature within Study Area	Assessment	Recommendation
Shape/Size/Contiguity Enhancement (*site-level infill efforts*)	**E257**: small area associated at the northern end of H1S3	Enhancement Area E257 is associated with a non-participating HDF H1S3 which was provided with a management recommendation of Mitigation, pending further studies. Therefore, this feature is anticipated to be removed and have its functions replicated. As such, this enhancement would not support any site-level infill efforts and is not contemplated as part of the LSS. Instead, the proposed Wetland Relocation and Compensation Area will allow for the creation of one consolidated wetland feature anticipated to provide improved habitat conditions for wildlife. As this will be connected to the adjacent culvert, this will also create an improved linkage corridor downstream of Centreville Creek Road.	**Enhancement not required.** Alternative enhancements associated with the proposed Wetland Relocation and Compensation Area will be provided to promote a net gain approach for the Study Area's NHS.
	E227: associated with MAM2 and CUT1 on non-participating property.	**E227**; as this is located on a non-participating property, final detailed design has not been confirmed yet. However, there may be opportunities for enhancement if this feature is retained. GEI recommends this be deferred to site specific applications.	**Enhancement feasible –** defer to site specific applications.
Linkage – PLZ Enhancement (*blended transition between natural and built form; may be comprised of a combination of land uses / covers as outlined in Table 2.6.3.4.)*	PLZ associated w. greenbelt NHS to east	**Linkage PLZ** – the goal of a PLZ enhancement at this location is not expected to be met as it is impeded by The Gore Road which creates an impervious barrier. As such, the purpose of a blended transition would not be met in this area. However, just south of this, a feature/site scale linkage surrounding H5S1/S2/S3 has been identified which will be retained and enhanced with a wetland creation area (Fish Habitat and Wetland Compensation Area).	**Enhancement Not Required** Alternative enhancements associated with the feature/site-scale linkage in the southeast corner of the Study Area will be integrated to support biodiversity, habitat, and linkage downstream of Mayfield Road.

Enhancement Feature Type	Feature within Study Area	Assessment	Recommendation
Floodplain Enhancement (*enhancement of regulated floodplains with natural cover*)	Associated with H1S1	**Floodplain enhancement**: H1S1 has been identified as an HDF with a management recommendation of Mitigation. The feature does not have a floodplain and will not be retained.	**Enhancement Not Required – Alternative Enhancement Proposed** Alternative enhancements associated with proposed Wetland Relocation and Compensation Area will be contemplated to promote a net gain approach for the Study Area's NHS.
	Associated with anticipated watercourse east of The Gore Road	This feature has been identified as part of a site/feature-scale linkage type. While not located within a participating property, this feature contains riparian wetlands, and it anticipated to be considered a watercourse. It is expected that this feature will be retained in place within the Study Area with an appropriate minimum VPZ to accommodate fish habitat, wetlands, and the floodplain.	**Enhancement feasible** – as this feature is intended to be retained in place, restoration of a riparian buffer area will help improve the overall natural cover associated with this feature.
Provincial NHS Enhancement	Associated with agricultural lands in the Greenbelt Plan Area located immediately east of the Study Area. It is GEI's opinion that their restoration should be counted towards the Wildfield Village Secondary Plan's Natural Cover targets, considering these are Wildfield-owned lands.	**Provincial NHS Enhancement:** restoration of these agricultural lands would provide a substantial increase (8.63 ha) of Natural Cover that would provide a considerable and effective buffer to the Greenbelt and the West Humber River valley.	**Enhancement feasible** – these lands are located on non-participating properties, however, there are significant opportunities for enhancement for properties that choose to participate in the development process.

Based on the assessment in **Table 2**, one of the Shape/Size/Contiguity Enhancements (E227) may be feasible. As this feature is located on a non-participating property, details on specific enhancements are recommended to be deferred to site specific applications. Additionally, one of the floodplain enhancements associated with the anticipated watercourse east of The Gore Road may also be feasible as the feature is intended to be protected in place with vegetated buffers that will contribute to improved riparian cover. The LSS Phase 3 will provide management strategies and recommendations for best practices and will outline the next steps for non-participating landowners within the Study Area.

Table 2 also notes that additional enhancements associated with feature and habitat compensation will be recommended within the LSS Study Area aimed at achieving an overall net gain to feature functions in a post-development landscape (**Figure 1**). While these enhancements may not necessarily increase natural cover within the Study Area, they are intended to improve quality of habitat and function of features.

Within the Study Area, as it relates to wetland targets, a net gain in function and quality of the system will be achieved through the following:

1. Wetland habitat will be in one contiguous area compared to existing conditions where features are generally small and isolated;
2. Wetlands will be designed to increase overall plant species diversity and wildlife habitat – this will be accomplished through strategic native plantings, invasive species management, and targeted habitat creation (e.g. amphibian breeding habitat, turtle nesting habitat);
3. The land use changes from agricultural will result in the elimination of disruptive activities such as ploughing to the edge of the feature and pollution due to fertilizers.
4. Instead of actively ploughed agriculture at the edge of wetland features, the post-development NHS will have enhanced, native vegetated buffer.
5. Improved thermal conditions are expected for wetlands as temperature increases will be mitigated by planting shrubs and trees on the slopes/buffer.

For fish habitat, a net gain in both area and quality of direct fish habitat will be achieved. The Fish Habitat and Wetland Compensation Area (**Figure 1**) is proposed adjacent/connected to watercourse H5S1/S2/S3 and will have native plants and organic material, as well as thermal mitigation provided from shading by shrubs/trees planted in the buffer. Compared to existing conditions for the ploughed-through HDF this is a considerable ecological gain.

Natural Cover Targets

In the Town comments regarding enhancements, there was reference to a requirement to address 'Natural Cover' targets as outlined in the SABE Scoped SWS. This is inclusive of a "30% increase in natural cover". Based on the SABE Scoped SWS, the targets are intended to be applied across the entire SABE NHS.

As shown on **Figure 2**, GEI has identified an existing natural cover of 11.53 ha for the Study Area. The proposed feature buffers (recommended to be planted with native vegetation), Wetland Relocation and Compensation Area and Fish Habitat and Wetland Compensation Areas provide 10.58 ha of new natural cover. The proposed post-development natural cover (assuming wetlands on non-participating lands are removed) is 15.03 ha, which is an increase of 30.3 % compared to the existing landscape.

Additional natural cover may be achieved for portions of agricultural fields within the Greenbelt that are immediately east of the Wildfield Village Secondary Plan Study Area (**Figure 2**). Although these lands are technically part of the adjacent Secondary Plan Area (H1), it is GEI's opinion that their restoration to natural cover should be counted towards the Wildfield Village Secondary Plan's natural cover targets, considering these are Wildfield-owned lands. These Greenbelt agricultural lands are the rear portion of Wildfield farm fields, that back onto the Greenbelt, and would provide an additional 8.63 ha in Natural Cover. These lands are also shown as a Provincial NHS Enhancement area (**Figure 1**).

3.0 Minimum Buffers

The LSS has been prepared to align with the Caledon OP. As the Study Area for this LSS is located within the 'New Community Area' Table 13.3 'Minimum Buffers' has not been applied to the LSS minimum buffer recommendation analysis.

This is based on the following Future Caledon OP Language as it pertains to the minimum buffers in Table 13.3:

> "*Table 13-3 sets out the minimum buffers required from certain components of the Natural Environment System on lands not subject to Sections 13.5, 13.6, 13.7 and 13.9*" (Section 13.8)

where Section 13.9 speaks to the Natural Environment System in New Community Areas and New Employment Areas.

As lands within the NES of New Community Areas are not subject to these Table 13-3 buffers, instead, as required in Section 13.9.3 - 13.9.6, minimum buffers have been proposed based on feature sensitivity. A more robust assessment of these recommendations will be incorporated into the Phase 2 LSS resubmission; however, it is GEI's opinion that Table 13-3 buffers should not be referenced as part of this LSS work.

To ensure alignment with 13.9.3-13.9.6, the Phase 2 LSS resubmission will include a more detailed analysis on how minimum VPZs can address feature sensitivity and anticipated impacts due to land use changes and will explore how to balance the use of minimum VPZs with other "mitigation, net benefit and regenerative opportunities throughout the land planning and design process where possible (Section 13.9.3)".

As per the updated Phase 2 LSS, the following **minimum** VPZs have been proposed, based on the sensitivity of the feature and adjacent land uses proposed:

- Significant wetlands + 30 m;
- Other wetlands + 10 m;
- Woodlands + 10 m;
- Warmwater fish habitat + 15m;
- Significant Wildlife Habitat (SWH):
    - Turtle Overwintering Area + 10 m
    - Habitat for Species of Conservation Concern (Terrestrial Crayfish) + 30 m
    - Wood Thrush (30 m for PSW; 10 m for woodland)
- Significant valleylands + 15 m;
- Non-significant valleylands (using the greater of long-term stable top of slope or staked top of bank boundary for confined systems; or the greater of meander belt or floodline boundary for unconfined systems) + 10 m.

It is understood that at the LSS stage, minimum buffers are recommended only. As more details on site-specific development is known, it is anticipated that an Environmental Impact Study will be completed to assess the suitability of these minimum buffers on a site-specific basis.

4.0 Conclusion

This letter report has reviewed relevant policies, literature, and natural heritage features to address various natural heritage comments.

Conceptual Linkages

It is GEI's opinion that the conceptual linkages noted in the Future Caledon Official Plan and SABE Scoped SWS are not required. The Study Area has been in agricultural use for over 70 years, with small and scattered natural heritage features remaining. The existing natural heritage features and their functions will be maintained and enhanced through the proposed NHS that includes:

- Feature protection with appropriate buffers;
- Wildlife habitat creation adjacent to existing linkages;
- Enhancement of stepping-stone habitat through strategic buffer plantings, restoration, and wildlife enhancement efforts within the minimum VPZs;
- The provision of two alternative site-scale linkages, as shown on **Figure 1**; and
- Additional connectivity and linkage functions are proposed through the Wetland Relocation and Compensation Area (**Figure 1**) which will provide contiguous wetland habitat adjacent to the aquatic feature (watercourse or HDF surrounded by riparian wetlands) downstream of Centreville Creek Road.

Considering the above, **it is GEI's opinion that the expectation that additional linkages will be created, and agricultural lands will be re-designated as NHS is not a reasonable ecological rationale in comparison to the significant loss of housing supply and neighbourhood connectivity in the new Community Area.**

Enhancement Areas and Natural Cover Targets

It is GEI's opinion that several of the preliminary enhancement areas noted in the SABE Scoped SWS are not required, as alternative enhancements including enhanced vegetated buffers and compensation areas that will achieve ecological net gains in habitat quantity and quality and improve feature functions. These net gain benefits will be described in detail in the next submission of the Phase 2 LSS.

Three of the preliminary enhancement areas may be feasible and include: Shape/Size/Contiguity Enhancement #E227 (**Figure 1**); a floodplain enhancement associated with the anticipated watercourse east of The Gore Road that is intended to be protected in place with vegetated buffers; and enhancement of the agricultural lands within the Greenbelt, located immediately east of the Study Area.

The proposed NHS with vegetated compensation areas and feature buffers meets the SABE Scoped SWS target of a 30% increase in Natural Cover, as shown on Figure 2.

Minimum Buffers

As per the Future Caledon OP, the **LSS will not address the minimum buffers outlined in Section 13.8. Instead, the LSS will rely on the impact assessment work and guidelines in 13.9.3-13.9.6 to recommend minimum buffers based on feature sensitivity for the LSS Study Area.**

Sincerely,

GEI CONSULTANTS CANADA LTD.



Holly Stemberger
Environmental Planner
226.820.2535
hstemberger@geiconsultants.com



George Buckton
Senior Ecologist
416-816-2246
gbuckton@geiconsultants.com



Shelley Lohnes
Vice-President, Senior Ecologist
289-971-7389
slohnes@geiconsultants.com

Attachments

- Figures

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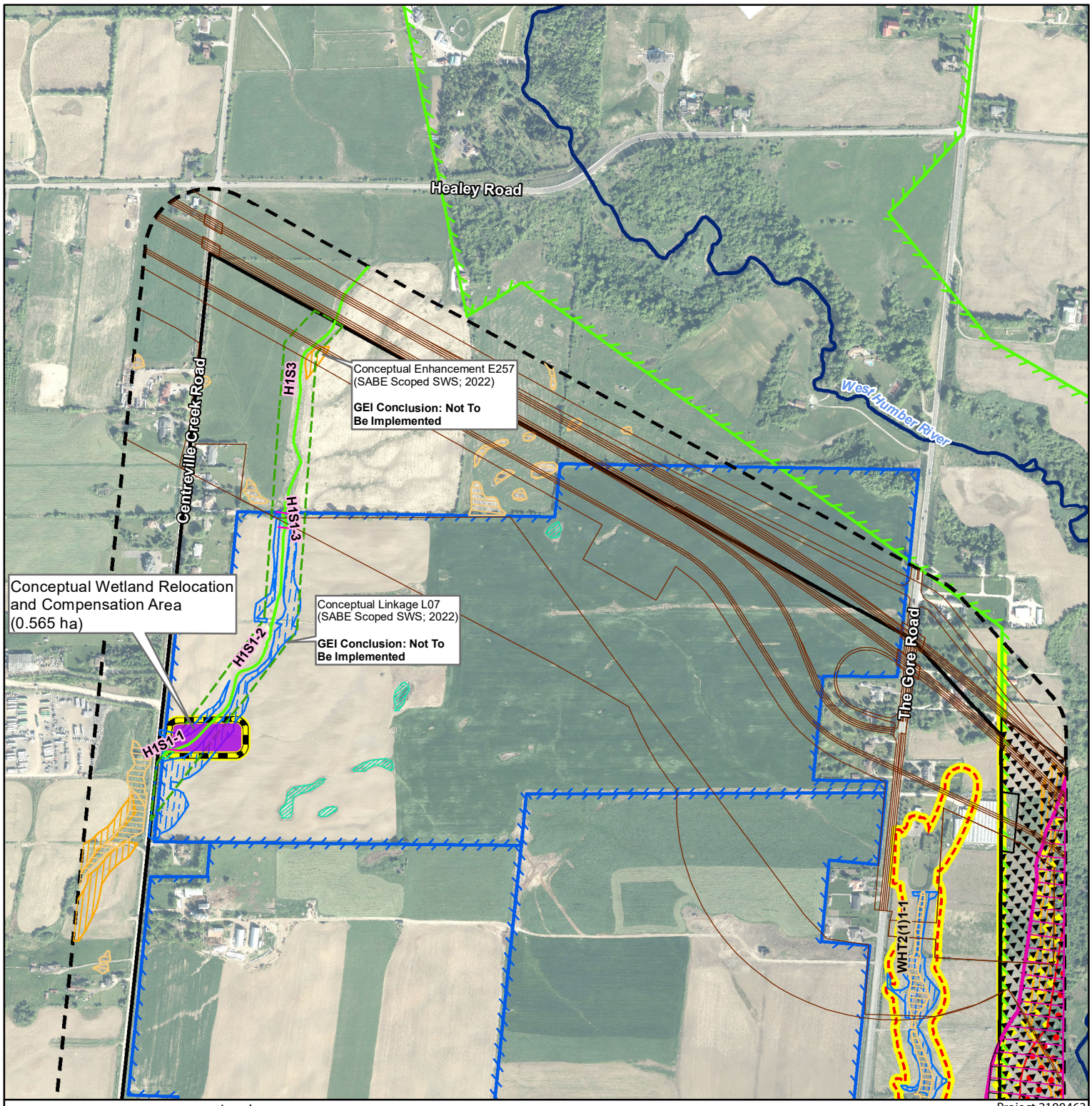
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Wood, 2022 Scoped Subwatershed Study, Part A: Existing Conditions and Characterization (Final Report)

Wood, 2022 Scoped Subwatershed Study, Part B: Detailed Studies and Impact Assessment (Final Report)

Wood, 2022 Scoped Subwatershed Study, Part C: Implementation Plan (Final Report)

FIGURES



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NOTES:

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*Watercourse/HDF only showing on participating lands

Legend

- Wildfield Secondary Plan Area
- Adjacent 120m
- Participating Landowner
- Greenbelt Natural Heritage System
- Unevaluated Wetland Non-Participating Wetlands
- Wetlands Proposed for Removal (0.72 ha)
- Natural Heritage System (Natural Heritage Feature and Hazard Buffers)
- Natural Heritage System (Conceptual Compensation Area)
- West Humber River
- Approximate Highway 413 Alignment
- Site-Scale Linkage 2 (GEI)
- Conceptual Wetland Relocation and Compensation Area (0.565 ha)
- Conceptual Fish Habitat and Wetland Compensation Area (0.238 ha)

Watercourse/HDF (source and class)*

- GEI, HDF - Mitigation

Reach Breaks

- GEI

Linkages and Enhancements (SABE SWS; 2022)

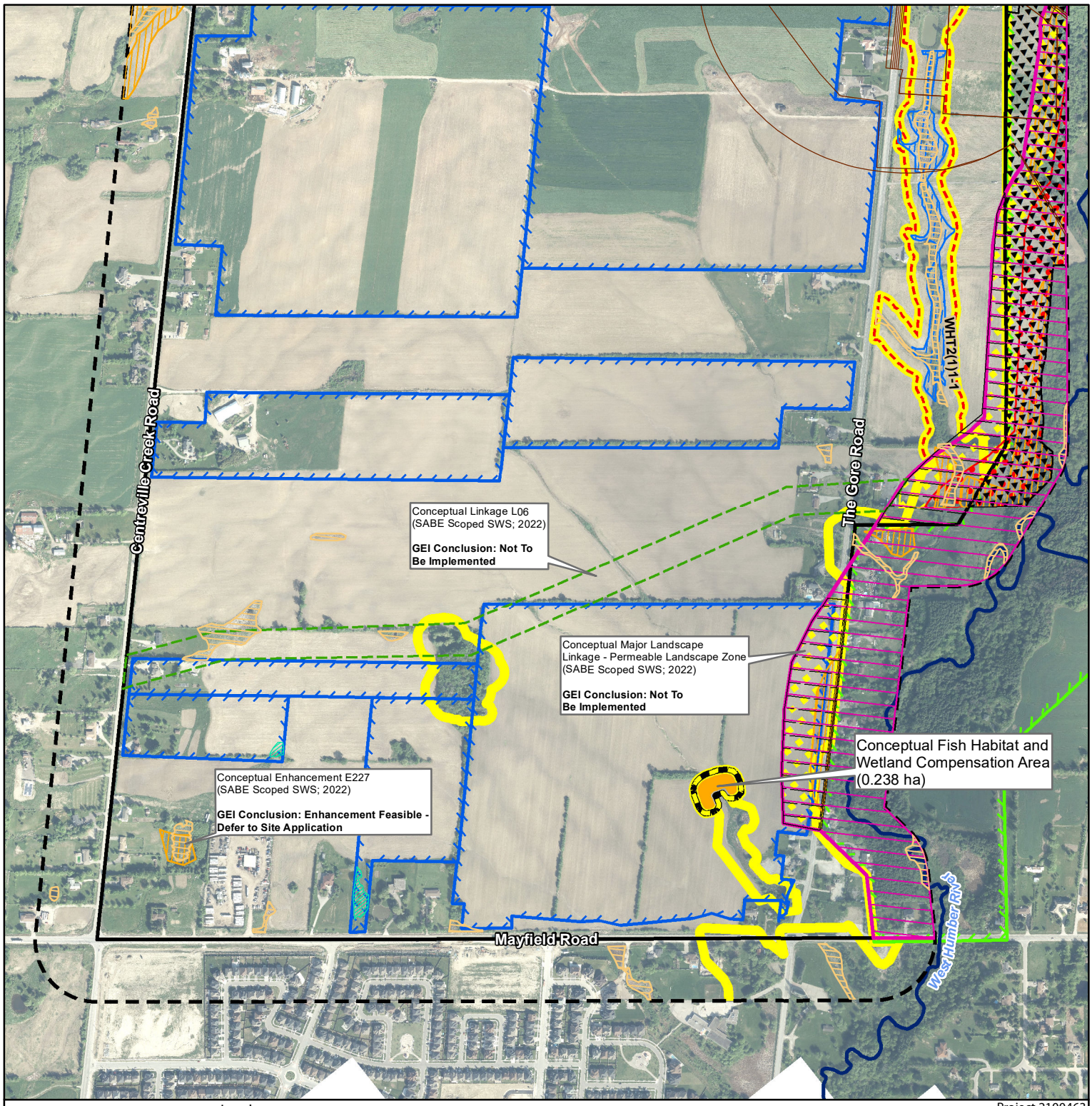
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- Shape, Size, and Contiguity Enhancements
- Permeable Landscape Zone Enhancements
- Minimum Vegetation Width Enhancements
- Provincial NHS Enhancements
- Major Landscape Linkage - Permeable Landscape Zone
- Linkages
- Conceptual Linkages

Wildfield Local Subwatershed Study
Wildfield Village Landowners Group Inc.

Figure 1
Linkage Assessment

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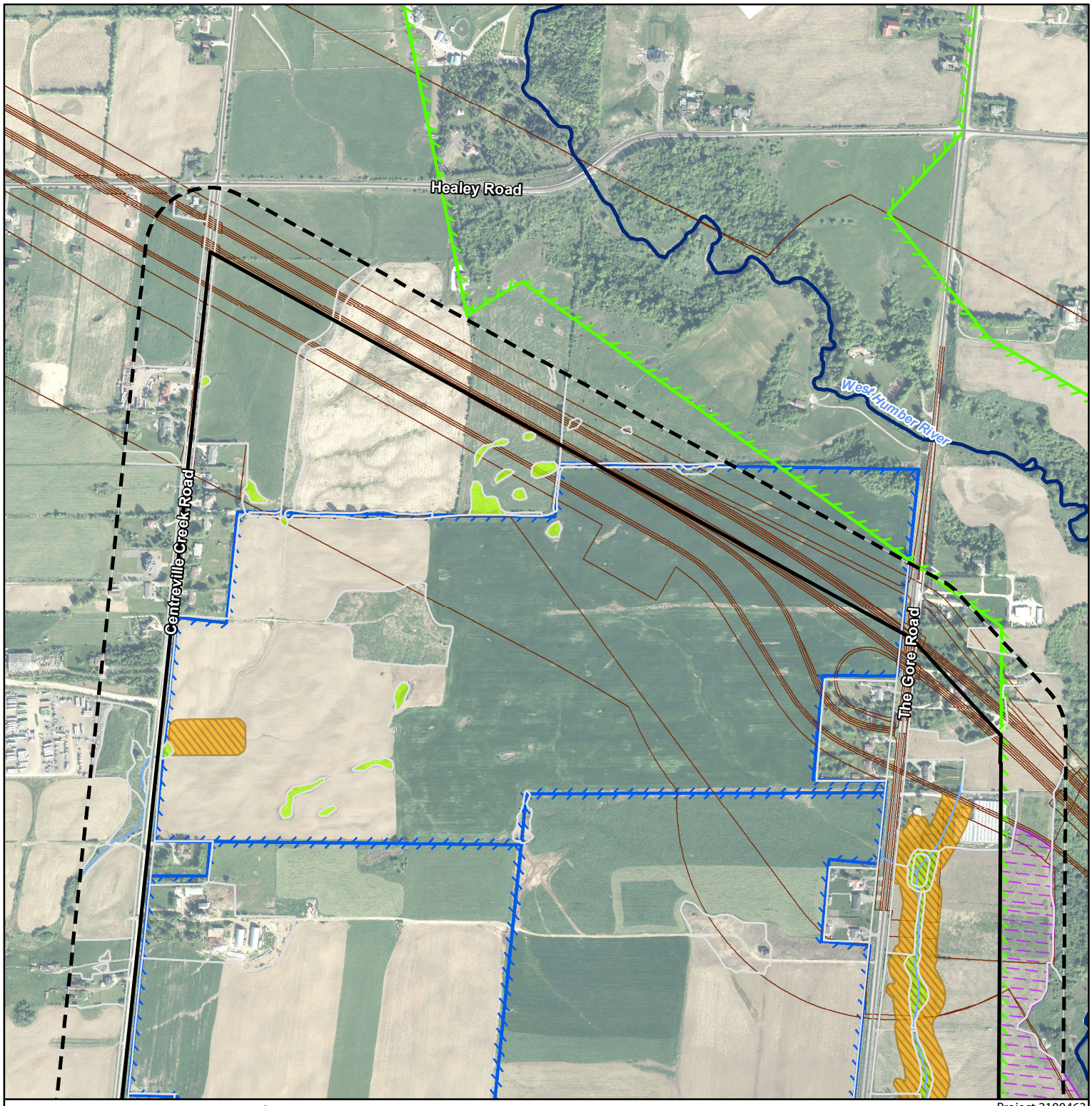
Wildfield Local Subwatershed Study
Wildfield Village Landowners Group Inc.

Figure 1
Linkage Assessment

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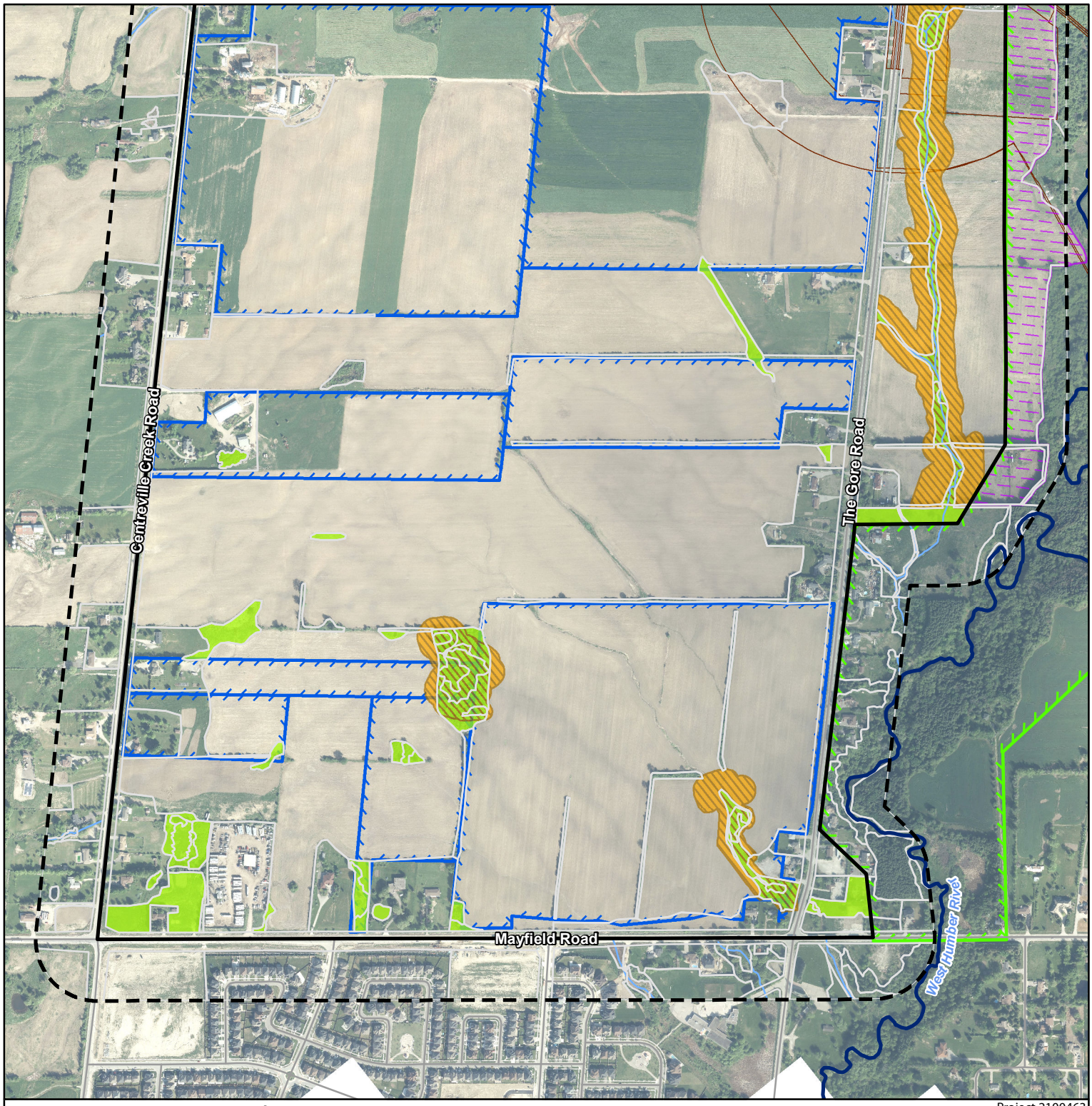
Wildfield Local Subwatershed Study
Wildfield Village Landowners Group Inc.

Figure 2
Existing and Proposed Natural Cover

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Wildfield Local Subwatershed Study
Wildfield Village Landowners Group Inc.

Figure 2
Existing and Proposed Natural Cover

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