



Thursday, February 8, 2024

Attention:

Peter Mara, P.Eng., Deputy Chief Administrative Officer
Town of LaSalle
5950 Malden Road
LaSalle, ON, N9H 1S4

Mark Hernandez, P.Eng., Project Manager
Dillon Consulting Limited
3200 Deziel Drive, Suite 608
Windsor, ON, N8W 5K8

Dear Peter and Mark,

Re: Howard/Bouffard Master Drainage Study – Notice of Study Completion and Final Report

Thank you for providing the Essex Region Conservation Authority (ERCA) with the opportunity to review and comment on the Town of LaSalle Howard-Bouffard Master Drainage Study Final Report. This letter serves to acknowledge receipt of the Notice of Study Completion for the project, and to provide value-added feedback with respect to the findings of the study and the contents of the final report. After a thorough review of the materials, ERCA provides the following comments:

1. Section 1.0 (Page 2) of the Final Report describes the overall purpose of the study, which includes the language "defines the flood mapping for existing conditions". Upon review of the document and the existing conditions map (Figure 2: Flood Inundation Area), it should be clearly documented that regulatory flood mapping extents are not provided as part of this study since Figure 2 is based on modelling values that have since been modified/refined through the Turkey Creek Hydrologic and Hydraulic Update (the Turkey Creek Study). It is recommended that Figure 2 be clearly identified as a "draft flood extent" based on early work and may not represent actual conditions in the field during such an event, directly on the figure. This is identified in Section 1.1; however, it is recommended to be included within/on Figure 2 to avoid potential misuse or misrepresentations of the potential flood extents.
2. Section 3.9.2.1 summarizes discussions with the ERCA office. The report states that ERCA requires a less than 2 cm increase in water levels. Our office does not have a record of Meeting Minutes for this meeting; however, ERCA's typical standard is that modelled watercourses have no more than a 1 cm change in water level. Significant work was completed by the consultant as part of this study to demonstrate no negative impacts to the Canard River system, which we believe to be conservative. This comment is only to clarify typical standards with respect to flood levels on modelled watercourses.



3. Section 3.9.2.1 summarizes discussions with the ERCA office. It is recommended that the tailwater elevations be included in the report (1-in-5 year Detroit River and 1-in-25 year Canard River) for ease of reference and any potential future work.
4. Section 4.3.1 provides elements related to Source Water Protection. Please refer to the attached letter and map, provided by the Source Water Protection Project Manager.
5. Section 4.3.3 describes the Existing Conditions with respect to flooding. The reference to Figure 2 should again indicate that the inundation mapping is based on information and estimates completed earlier in the study that have since been refined, and therefore, may not provide an accurate depiction of potential flood extents within the Study Area.
6. Section 4.3.3 describes the Existing Conditions with respect to flooding, more specifically, that the Lepain Drian and 6th Concession drains are predominantly contained within their respective banks under major flood events, and that the Cahill Drain spills southerly. It is recommended that an *existing conditions* table of flows and corresponding water levels at key locations be provided as part of the final report. It is typical to provide a flow and a corresponding water level at road crossings. With respect to the Cahill Drain, this report refers to the Turkey Creek Study for information related to the spill rate and volume. This information is a key component of the Howard Bouffard Master Drainage Study and should be included in this report for ease of reference and future use. It is therefore recommended that the spill flow rate and volume be included within the report (and ideally within such an *existing condition* table). Similarly, any changes to future flows should be documented in a table as well.
7. ERCA does not have any objection to the Preferred Alternative (Option 3) which includes a combination of new open drains and local stormwater ponds. Figure 7 depicts various key elements of this solution, including but not limited to:
 - a. Reaches 1, 2, and 3 and associated cross-section parameters; and
 - b. Various ponds and associated storage volumes.

It is recommended that these reaches include expected flow rates and that pond information include contributing areas (drainage area plan and hectarage), planned impervious area that corresponds to the volumes displayed, and allowable release rates into the larger watercourses. It is assumed that the receiving watercourses are designed based on the potential release rates of these ponds.

8. Additionally with respect to the Preferred Alternative, while development is planned to proceed with local stormwater facilities, it is recommended that this study provide release rates for contributing lands, prorated on a per hectare basis (i.e. L/s/ha) to facilitate and expedite development applications within the Study Area. This should be based on the size of the proposed receivers and prorated to contributing areas based on the expected flows planned for in this study. This can avoid individualized assessments by developers and practitioners that are likely to use differing methodologies to determine “pre-development” and allowable release rates. Implementing this type of strategy could maintain the wholistic watershed approach that

is intended by this study. It may also be beneficial to understand the total expected flow rate from the local drainage areas into Reach 1 as a separate flow rate from the potential 1-in-100 year spill rate and volume from the Cahill.

9. It should be noted that reviews by the Essex Region Conservation Authority will be required for all future work as the Master Drainage Study does not provide sufficient detail design information for our office to issue Section 28 approvals under the Conservation Authorities Act, or related development approvals for the construction of the proposed drainage scheme or any works associated with the lands that are proposed to be developed. It is our office's understanding that detail design for the preferred alternative will take place through the Drainage Act or some other alternative, and that development will proceed through the relevant processes. Our office requires the opportunity to review such information in advance of any works taking place.

Thank you for the opportunity to provide input into the study. Should you require further information, please contact me by email at jbryant@erca.org or at planning@erca.org.

Regards,



James Bryant, P.Eng.
Director of Watershed Management Services

Cc: Jonathan Osborne, Director of Public Works, Town of LaSalle
Alicia Good, Watershed Planner, ERCA
Katie Stammers, Source Water Protection Project Manager, ERCA



The proposed project falls within the **Event Based Area (EBA)** for the Amherstburg Water Treatment Plant based on the maps included in the Master Drainage Study Report.

Significant Drinking Water Threats

In this area, the above grade handling and storage of liquid fuel in volumes of 15,000 L or greater is identified as a Significant Drinking Water Threat (SDWT). Should fuel of this volume be required as part of the proposed works, the proponent will need to notify the Essex Region's Risk Management Official to develop a Section 58 Risk Management Plan to mitigate this threat to drinking water.

Transport Pathways

The Event Based Area (EBA) and other vulnerable areas are delineated using the best available mapping of drains and other watercourses. The proposed project may potentially include the creation, relocation or removal of drains and/or other open watercourses and sewers, which could alter the delineation of vulnerable areas in the Essex Region. Should the project plan result in any of the above actions that could affect the delineation of the vulnerable area, the proponent is asked to inform the Essex Region Source Protection Authority. Once the project is complete and these changes are finalized, Essex Region Source Protection staff may need to adjust the delineation of the vulnerable areas. Any changes to these delineations would need to be included in formal updates to the Source Protection Plan and Assessment Report using the provisions of the *Clean Water Act* (s.34 or s. 36) or its Regulations (s.51).

Groundwater

The proposed project area is within Significant Ground Water Recharge Areas. There are no associated SDWTS or policies with these areas.

Again, we thank you for the opportunity to provide comments on this project and look forward to hearing more as it progresses.

Sincerely,

Katie Stammeler, PhD
Source Water Protection Project Manager

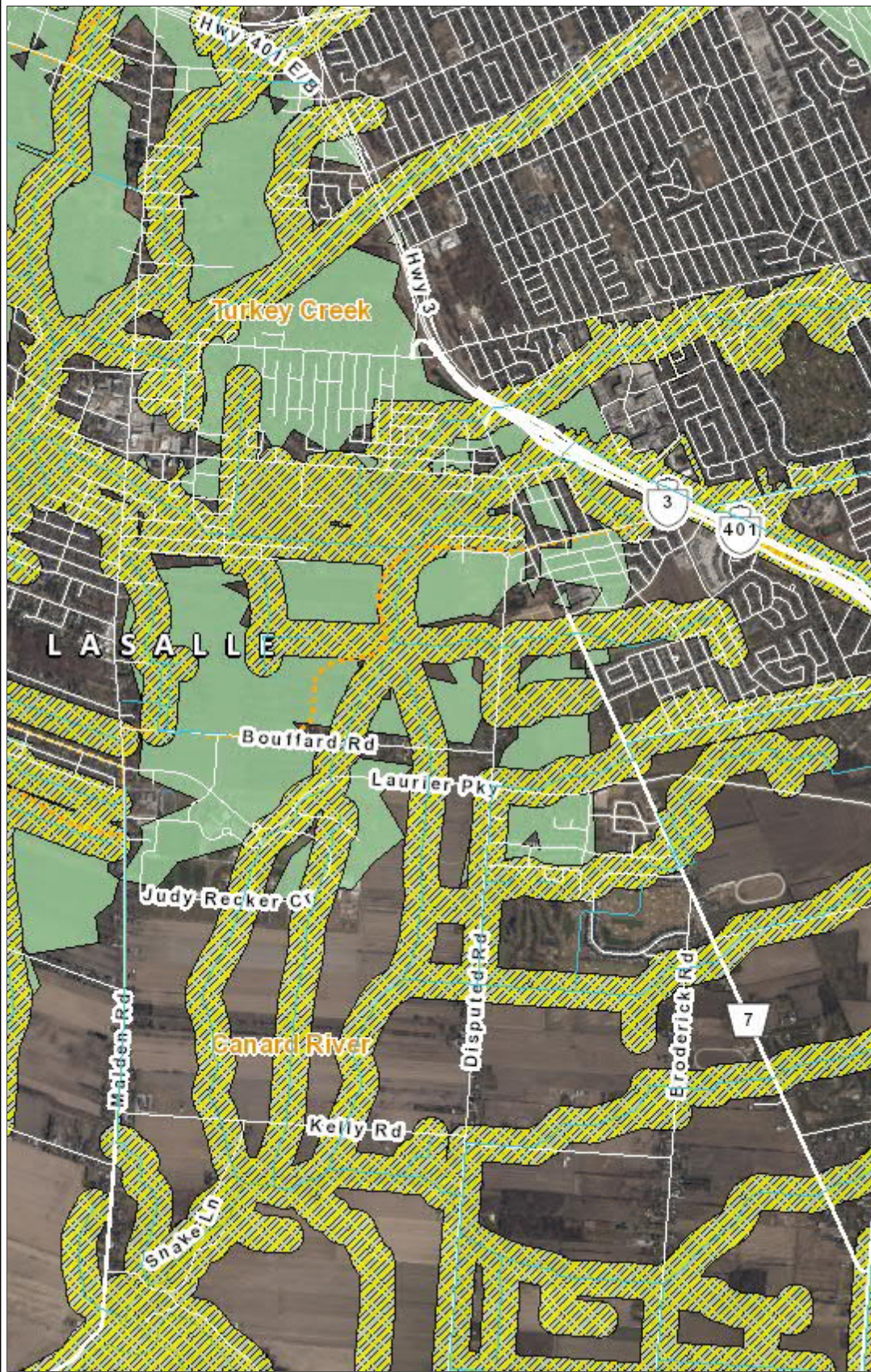
ERCA Internet Mapping



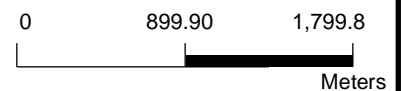
Essex Region
Conservation
Authority

Legend

- Subwatershed (Line)
- Surface Water Intake
 - A
 - B
 - D
- Event Based Area (EBA)
- Surface Water Intake Protection Zone
 - 1
 - 2
 - 3
- Highly Vulnerable Aquifer (HVA)
- Significant Groundwater Recharge Ar
 - 2
 - 4
 - 6



Location



1: 40,490



2/8/2024

Notes



THIS MAP IS INTENDED FOR INTERNAL USE ONLY.

All data copyright 2024. Data provided by ERCA or its partners under license.

Data herein is provided on an 'as is' basis and is for visual reference only. Map not to be used for navigation or plan of survey.

Aerial photography copyright the City of Windsor/County of Essex/Ontario Ministry of Natural Resources and Forestry, Queen's Printer for Ontario/ERCA.

April 18, 2024

Sent Via Email

Essex Region Conservation Authority
360 Fairview Avenue West, Suite 311
Essex, Ontario
N8M 1Y6

Attention: James Bryant, P.Eng.
JBryant@erca.org

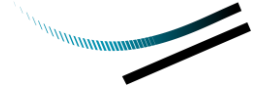
***Response to February 8, 2024 Comments
Howard/Bouffard Master Drainage Study
Town of LaSalle, Ontario***

Dear James,

Thank you for your comments on the Howard/Bouffard Master Drainage Study (MDS). Our responses below have been structured to follow the numbered items in your comments. The revised MDS Report will be posted on the project page on the Town's website for reference.

1. Based on the feedback received from PIC 3, a paragraph was added under Section 1.1 on Page 2 that notes that the extents were based on stormwater models prepared early in the study and that based on the results of the Turkey Creek Study, the flood extents are likely less than what is shown on Figure 2. In light of your February 8th comments, we can supplement this by adding a note to Figure 2 that indicates the same to help prevent misunderstanding or misuse.
2. The Howard/Bouffard team completed the study with the understanding that the water levels were to be restricted to a 2 cm increase in water levels, however, we will add to section 3.9.2.1 that ERCA's typical standard for modelled watercourses is 1 cm. As mentioned in your email, the team worked to limit the impact to the Canard River system.
3. The tailwater elevations for the 1-in-5 year Detroit River and 1-in-25 year Canard River will be added to Section 3.9.2.1.
4. Sections 4.3.1 and 6.3.1 will be updated in response to your comments regarding Source Water Protection.
5. Your suggested note regarding Figure 2 will be added to Section 4.3.3.
6. An existing conditions table of flows and corresponding water levels at key locations will be added to Section 4.3.3. Additionally, changes to future flows will be documented in Section 5.4 of the report.

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7. The expected flow rates for Reaches 1, 2, and 3 will be added to Figure 7. Pond information including contributing areas, planned impervious area that corresponds to the volumes displayed, and the allowable release rates into larger watercourses will be added to Section 5.4.
8. Release rates for contributing lands, prorated on a per hectare basis, will be added to Section 5.4. The total expected flow rate from local drainage areas into Reach 1 will also be included in this section.
9. Your comments have been noted. Section 7.7 of the MDS Report indicates ERCA approval for Work within a Regulated Area as one of the approvals that is anticipated to be required prior to construction of the preferred solution.

Thank you for your review and comments on the MDS Report. We trust these responses and the revisions to the report will provide additional clarity about the matters raised in your comments.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager

cc: Peter Marra, Town of LaSalle

Our file: 18-8169

To

Ministry of the Environment, Conservation and Parks,

Ontario

cc.

Gudrin Beggs, Planner, Town of LaSalle

Council, Town of LaSalle Ontario

Peter Marra Head of Public Works Town of LaSalle

Comments Regarding the Howard Bouffard Master Drainage Study Report, as well as the Howard Bouffard Secondary Plan Environmental Assessment

Submitted by

[REDACTED]

Resident [REDACTED]
LaSalle Ontario [REDACTED]

As I write this commentary it is 16 degrees and climbing,,, spring weather in LaSalle on Feb 9 2024. I want to begin by saying that all bets are off on the adequacy of using 1 in 100 year flood data for the Howard Bouffard Planning District Master Drainage Study. Also to be noted, the benchmark Chicago 150 mm precipitation standard over 24 hours may need rethinking as well. In Aug 2017, Aug 28 and 29 within a 32 hour window, 289 mm of rain fell in LaSalle. This is still one of the top weather incidents in Canada. And within 2 consecutive years, this area experienced 1 in 100 year rainfall events.... In many cases, 1 in 1000 year events are happening now.. 1 in 100 year data does not account for extreme weather caused by climate change...NOAA.

(At one point in local history, the climate was responsible for shaping the Great Lakes, in a period of very rapidly changing climate. In the last 10000 or so years, the lakes were at one point half as big as they are today and again about twice as big...with different boundaries and names...we could be driving into a new period of very rapid climate change with unknown results....driving ourselves into a climate cul de sac with insensitive development, stripping out the potentially mitigating impacts of microclimate provided by our natural environment. I cannot overstate the importance for myself and all who care about the future of giving the environment what is its due within the Howard Bouffard Planning District. In the end I am sure

that Nature will have the last word, one way or the other in spite of our hubris., negligence, self will, etc. (Maps of the great lakes will be provided)

In response to the Howard Bouffard Master Secondary Plan Environmental Assessment and the Howard Bouffard Drainage Study Report, I am submitting these comments to the Ministry of Environment, Climate Change and to the Town Council of LaSalle, the Town Planner, Gundrin Beggs, Peter Marra, LGL Consulting and all interested parties. This response includes an altered map from the Howard Bouffard Planning District Environmental Assessment, that I have used to illustrate some possible changes to land use and stormwater design that would address natural corridors that would link the currently fragmented natural heritage features of this area. Very significant natural heritage such as Ojibway-LaSalle, needs linkages to truly be **a natural heritage system**. The rich natural heritage here is worth the kind of respect that the Herb Gray Parkway project afforded this area. I am aware of the wetland mitigation and species at risk ratios of the H.G. Parkway that were as high as 9:1 if memory serves...

It has occurred to many that the process to achieve flood attenuation in the Howard Bouffard Planning District has many opportunities to include and combine natural heritage options, ie within stormwater features, and parkland features, ie the LaSalle Trail system, etc. Opportunities to create dual use human and wildlife corridors would be very efficient.

In the Howard Bouffard Planning District Map supplied by Planner to myself, I have used the paint program to alter and put down a few ideas. The following itemizes some of these.

- Black Check Marked Areas-----Residential Development Area that has been Repositioned.
- White Check Marked Areas-----Natural Heritage Features that have been Added, Augmented, or Enhanced
- 2 Tone Striped Areas-----Zoning Alternatives between 2 Zones, Residential and Stormwater
- Question Mark ----- Optional Choice or Decision Tree
- Medium Olive Green-----Environmental Area or Corridor
- Red Dotted Circle-----Bald Eagle Habitat
- Violet Purple-----Ecopassage wildlife crossing---culvert possibility

-

Some General Comments,

Wildlife Corridors

Laurier Parkway as planned creates a formidable hardscaped urban barrier between the Natural areas of North LaSalle and Farmland of South LaSalle, cutting off wildlife movement. So this version maintains a strong connectivity, by realigning stormwater elements, or widening the corridor along the Cahill Drain to create a viable wildlife corridor..... as an option. An added wildlife underpass-culvert gives a safe crossing from South LaSalle.

With some expanded applications and effort,,, the opportunity exists to create a Town that maintains its special character... People love living in LaSalle and have expressed their desire to keep a small town scale. Urban Heat Islands and rush is not what LaSalle is about....

Walkability and Nature are a big part of this. Wetland and Native species of trees would enhance naturalized areas of stormwater and drainage, as well as improve walkability on trails corridors for wildlife, to the effect of creating savanna, forest or open groves,, to add visual interest , habitat....and cooling stations.....As our climate heats up, this will be a necessity for human use, and will benefit wildlife at the same time. Wider corridors have been added to the map to increase resiliency for wildlife..... Also redundancy in adding more connective corridors has been added as well. Hopefully this approach along with the planned LaSalle Trail concept can allow the wonderful wildlife habitats and ecosystems of LaSalle to persist and remain an integral part of the reality and planning of the new Howard Bouffard District.....So far LaSalle is pretty unique as a Town, and preservation of its character as a Town(ie. a Town within a Forest) is not a mere dream but a doable prospect with a little thinking out of the box, application,,,etc. In former conversations with Essex Region staff, the issue of the possibility of isolation of the Ojibway biosphere was of concern...this would not allow the rare species as much chance to survive in the long term..... islands of green are not preferred, but a greater Park Ecosystem approach is. Anyway I can see the enthusiasm for more trails as described within the project (ie. trails along the drains) as eagerness for the `beautiful, newly depicted drainage trail`p. 38.....` what I would expect to be a lovely walking track`, p.4...and as an answer to the question **what aspects of the design process do you like the most...**`The inclusion of a pathway or trail on the floodplain component,..p.23 .(Howard Bouffard Master Drainage Report, Appendix A Section 6 p. 38. P. 4, p. 23). It was also noted that much of this part of LaSalle has very little walkability. ...` most roads in this planning area are not serviced by sidewalks and may have narrow shoulders bordered by drainage ditches..makes walking along the road difficult if not dangerous....HBMaster Drainage Report, App. A Sec. 6. P. 23).

Realignment of Stormwater Ponds

My map shows a potential realignment of stormwater ponds in an effort to enhance wildlife and human use corridors. We as humans should not merely attempt to subdue and control natural heritage to allow the most development. Integrating the natural heritage into all our thinking will help to mitigate the extreme impacts of climate change, and also create the most harmonious and healthy environment possible....., but it should be deemed necessary to accommodate natural heritage systems.....with adequate corridors, connectivity and a view to the future.....Human dominance at this juncture will not win any points, it is better to make adjustments to live within our environmental means.....

So as far as Realignment of Ponds on the mapping,,,

1. The first potential realigned pond would be on the Cahill Drain,, south of a significant woodlot with a bald eagle nest.....moving this pond is an attempt to link this woodlot more directly to the woodlot to the west, and create a corridor... The premise is that the areas of single residence residential would be exchanged for the area of stormwater management. Or part of these areas. Lacking this realignment, in this area I have redrawn and widened corridor(s) to help create this linkage...as well as a north south linkage. In my mapping , corridors are a medium green.... Some midrise zoning has also been rearranged in this area to accommodate this..... Again the potential to realign ponds is shown by a question mark symbol in black and in colour code striping to show duality of possible zoning.....
2. The second potential realignment of ponding is just north of the large significant woodlot north of the Vollmer Center..... a repositioning, coming from the twin ponds further to the north and west. there are 2 corridors created, along the edge of this new ponding, one of which reconnects this woodlot to the Overlay Natural Heritage Area to the north as well as another which links into the corridor-drain running just north of Laurier. The latter corridor would run between areas of individual residences and commercial zoning.... This corridor could be a sort of conservation easement, berm area, to give some separation to the residential and commercial use in this area....as well as wildlife connectivity... Ultimately this corridor would connect to a north south drain and lead again to the Overlay Natural Heritage Area. These 2 corridors plus the stormwater pond would give connectivity and redundancy to an isolated but valuable woodlot.....
3. The third areas of potential realignment of ponds occurs south of the Laurier Parkway, along the East Cahill Drain with a very large pond giving up some real estate to be

repositioned to widen, enhance a natural corridor along the drain. The 2 new areas keep alive a corridor which can still be linked to the remnants of the Canard River. The northern piece is realigned just south of a potential wildlife culvert area under Laurier Parkway..... The sizable extent of the larger stormwater ponds in this area would appear to have habitat potential for wildlife and would be a draw from the habitat areas to the north and the south.... Hence the presence of a corridor would continue the existing potential for wildlife..and habitat, all necessities for a healthy ecosystem, for which I have not given up hope.

Overall Comments

So to this end, of more respect to the natural heritage of this area within these planning documents, I would like to see

- * broader wildlife corridors wherever possible,,,,, more generous, or where not easily achieved,, at least include nodes of broader corridors where possible. Also use of conservation easements to augment corridors

- * Use of ecopassages, culverts, large and small, in coordination with open natural drainage areas,,,,, especially where traffic is heavier. ie Laurier.

See the Facebook Community page Kevin O Neil, Wildlife Ecopassage Night Trail Cam to see the local wildlife using a small animal culvert, I believe, including local deer over an extended period of time.... Every species, quite amazing.....

- * Maintain strong connections between disparate habitat pieces, by **valuing the core habitat principle**.... For example the environmental overlay mapping, shows how a certain area labelled environmental overlay is central as a connectivity link between at least 3 natural heritage features... Linkages to this central habitat is vital to keep all 4 heritage areas well linked.....in my map I have drawn in several new corridors and connectivity areas to link all of the above natural heritage areas.....In a couple cases, stormwater features have been moved to try to achieve this end....

- * In all cases,, I **assume that stormwater features can be combined with naturalization** to achieve the best results... I don't know how this can be achieved, but without trying, it is a failure to fully integrate this beautiful potential of our natural heritage into the new town to be built. As said before, I have viewed some of the current drainage to be full of much more potential to be both beautiful, natural, native and functional and to enhance the landscape and experience of residents.... The response to flood attenuation on the land to be developed should be aiming to replicate this natural beauty....in my opinion.

I realize that the comments are aimed at 2 distinct studies, but they do communicate and interconnect,,,,,, and hope that between the map, my written explanations plus supplied photos

and references, that my intent can be conveyed and contribute to the planning of the Howard Bouffard Planning District, in terms of the Secondary Plan and the Master Drainage Study as much as possible...

Sincerely

[REDACTED]

[REDACTED]

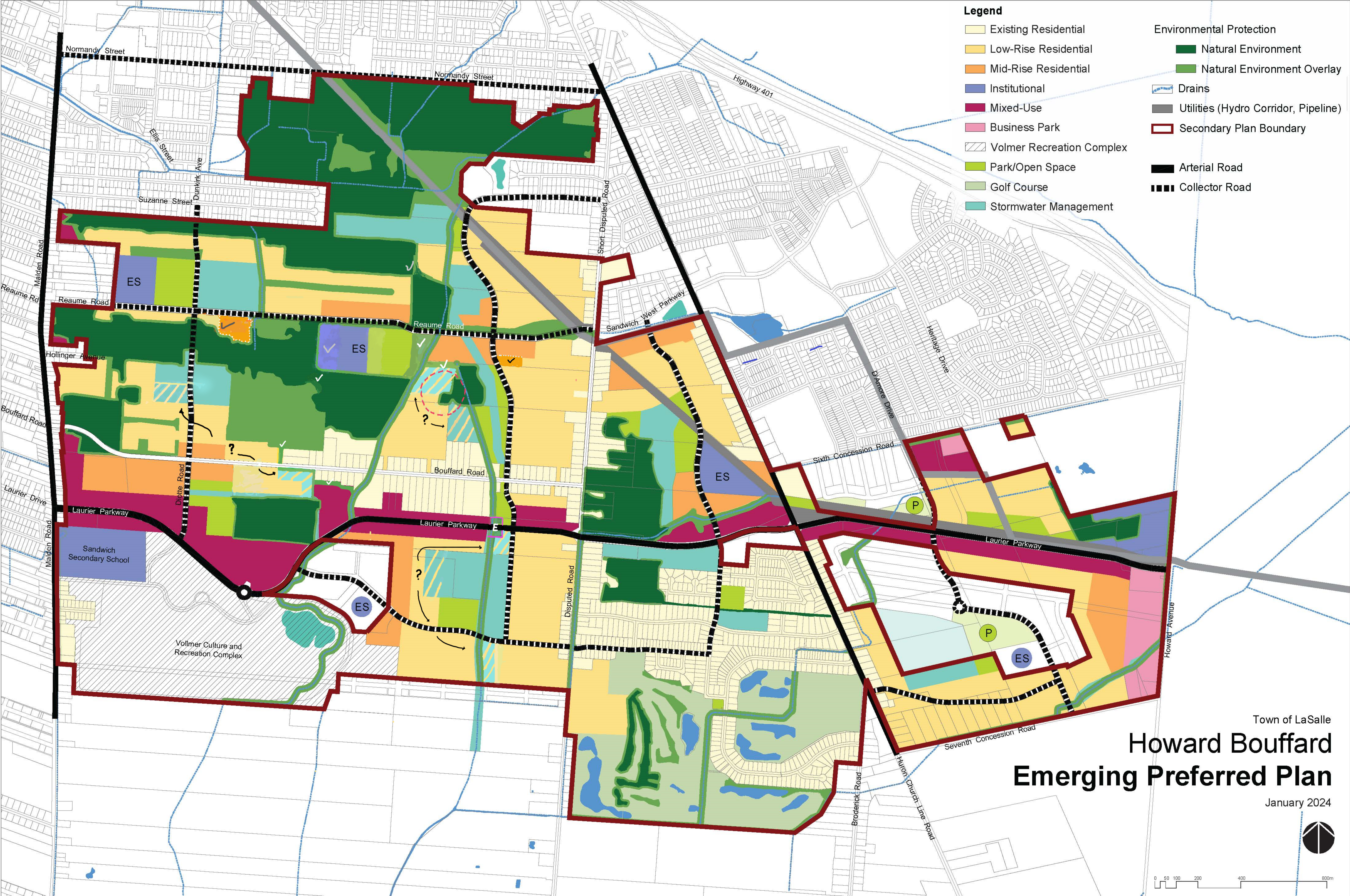
[REDACTED]

Wildlife Crossings, Culvert and Underpass Style





Howard Bouffard Secondary Plan



Town of LaSalle
**Howard Bouffard
Emerging Preferred Plan**

January 2024



0 50 100 200 400 800m



April 18, 2024

Sent Via Email

Attention: [REDACTED]
[REDACTED]

***Response to February 9, 2024 Comments
Howard/Bouffard Master Drainage Study
Town of LaSalle, Ontario***

Dear [REDACTED],

Thank you for your comments on the Howard/Bouffard Master Drainage Study (MDS). Your letter provided comments about both the MDS and the Secondary Plan for the Howard/Bouffard Planning Area, acknowledging that they are separate but interrelated studies.

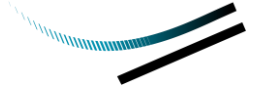
The purpose of the MDS was to determine the preferred solution to address flooding in the area during major storms. The Secondary Plan will set policies for land use within the study area. As part of the Secondary Plan, policies are being prepared to protect, enhance, and restore the area's natural heritage system.

This letter responds specifically to your comments as they relate to the MDS. Your comment relating to the Secondary Plan has been passed on to that project team for consideration while they finalize the Secondary Plan.

Your submission includes several recommendations and our responses below have been structured to address the "Overall Comments" which we understand summarize the general themes intended.

- With respect to wildlife corridors, we anticipate that the recommended drain realignments and improvements will create north-south and east-west linkages within the Howard/Bouffard Planning Area. We have noted in the MDS Report that there are opportunities for naturalization which should be given due consideration as the project moves to detailed design. This includes the proposed dry pond south of the Cahill Drain. The Secondary Plan will provide an additional opportunity to further enhance and promote natural linkages and corridors in accordance with the Essex Region Natural Heritage System Strategy Connectivity concept.

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- The local ponds that have been identified in the study to service the respective developments are based on the recommendations of the 2017 Bouffard Howard Planning Districts Class EA Addendum. The information from that study was used to inform the Howard/Bouffard MDS. The location, size, and other features of these ponds will be determined through the detailed design processes undertaken by the respective developers.

Thank you for your interest in this study. We trust these responses will provide additional clarity about the matters raised in your comments.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager

cc: Peter Marra, Town of LaSalle

Our file: 18-8169

Howard/Bouffard Master Drainage Study: A Landowner's Comments

9 February 2024



Key Observations and Suggestions

The Howard/Bouffard Master Drainage Study and the Secondary Plan in their present form are based on an outdated concept of development, which views the natural environment mainly as a constraint to development, and not as an invaluable legacy, with a shared responsibility to halt and reverse the historic degradation. Both plans need to be substantially revised to reflect a 21st century understanding and prioritization of environmental and quality of life issues in one of Canada's most unique, threatened and fragmented ecosystems. If these plans are maintained in their current form, they are likely to face an increasing number of challenges from many different levels, possibly resulting in ongoing delays. A different approach is needed to work toward unlocking the housing and living potential of Howard/Bouffard, while integrating a forward-looking environmental vision for the new town that is more than maximum suburban development enclosing isolated, non-viable fragments of natural habitat.

Specifically, the drainage plan should be revised to include an alternative vision that was never put on the table, one which recognizes the once-only opportunity to make ecological restoration a significant feature of this new development of unprecedented magnitude in Essex County. The Town may decide that it is not necessary or appropriate to maximize the area of land for building, especially since housing development is limited by sewage capacity and not the availability of land. The core of the Howard/Bouffard plan area is both a historical and present wetland and floodway, even if most of the natural vegetation has been removed or disturbed over time. Both the drainage plan and the secondary plan should provide for a broad, continuous ecological corridor from LaSalle Woods to River Canard that will not be assigned to built development, and will gradually be restored to natural habitat with the participation of many partners. (Please see the concept map at the end of this document.) This green core can do most of the job of accommodating and managing floodwaters in a natural and naturalized setting. It will have numerous other benefits for people, nature and climate, and will become an outstanding central feature of the new town – a kind of new blue-green waterfront. Not least importantly, it will allow Ojibway National Urban Park to connect through LaSalle to the rest of the landscape.

It is my understanding that the Town has the power to decide which lands in a floodplain and wetland should be drained for development and which should not, taking into account a range of policy objectives. In fact, the option of creating a green corridor would give effect to numerous policies in both the Town and County Official Plans, not to mention provincial policies, and even federal initiatives such as Ecological Corridors and National Urban Parks.

Landowners in Howard/Bouffard have never been granted or acquired the right to build in the floodplain areas. Nevertheless, it would be reasonable to consult with developers with a view to allocating higher density privileges on lands outside the proposed corridor, so that they can still build the same number of units as they would have by building at lower density on all open land.

The Crayfish in the Coal Mine

Could we pause a moment and try to see Howard/Bouffard from the position of a lowly creature like a crayfish? The map of Significant Natural Features on page 77 of the drainage report shows a small area within Howard/Bouffard where Terrestrial Crayfish are known to occur. I sincerely hope that crayfish are still hanging on in some other habitat patches, but it is clear that what used to be a common animal, and part of a child's world of adventure in LaSalle, is now very hard to find. Where have all the crayfish gone? The reasons for their decline are the same as for most of our other species, whether officially endangered or relatively common. They have been reduced to isolated patches by habitat loss and fragmentation, including the drainage of wetlands and other forms of development. In general, the size of remaining patches of habitat is already too small to support the long-term survival of many species of animals and plants. It is our formal responsibility to plan our landscapes, even urbanized landscapes, so that crayfish and many other creatures and plant species will survive and recover to a viable population level. The way to do this is now well-known: fragmentation has to stop; and well-planned, effective restoration has to be prioritized in order to expand and connect remaining habitat.

With more than enough land area to support LaSalle's long-range housing projections, and outstanding natural features that need to be not only protected but extended and enhanced, the Town should choose to make Howard/Bouffard a leading example of planning with nature, rather than continuing on the historical path of fragmentation and slow strangulation of wild species and habitats.

Weaknesses of the Master Drainage Study Report

This section addresses some of the major issues with the drainage study report. These weaknesses are significant enough to justify a substantial revision of the report. This revision would not be a case of adding words or data to justify the current option, but would involve creating a new option that will focus on the desired future state of our natural and built environments. As it stands, the drainage plan could be subject to challenges at various levels that could ultimately further delay its implementation.

1. Although the Howard/Bouffard Master Drainage Study was produced within the framework of the *Municipal Class Environmental Assessment*, it is a long way from being adequate as a decision tool as concerns the natural environment. The description and analysis of the natural environment are in no way sufficient to evaluate the impacts of draining many hundreds of acres of wetlands, filling them with built developments, and irreversibly isolating most remaining patches of habitat. It is understood that the direct footprint of physical drainage infrastructure on remnant natural areas will be limited, but this does not mean there will be no impact of the overall development with its dramatic changes in land use and hydrology. Further, there is almost no consideration given in the report to the once-for-all-time opportunity to choose a path toward repairing a severely damaged ecosystem through restoration.
2. The study process appears to have been designed to circumvent the requirements for a Schedule C project, which requires a full Environmental Assessment. Clearly, the overall process of draining over two thousand acres of land to convert it to dry land for a new town of over 20,000 people involves "the construction of new facilities and major expansions to existing facilities", which is the basic definition of a Schedule C project. This is not a case of "improvements and minor expansions to existing facilities as well as new smaller scale projects", which is the definition of Schedule B projects. (Please refer to pages

6 and 26 of *Municipal Class Environmental Assessment*, March 2023.) Breaking down a large project into smaller ones, when the clear intent is to create a very large drainage and building project, does not justify avoiding a full Environmental Assessment.

3. The terms of reference for this study of far-reaching importance have been withheld from the public. Besides going against everyday principles of transparency, this has the effect of hiding the major decisions that were apparently made before the study was initiated.

4. A key weakness of the study is that only a limited range of options have been entertained in the public process, thereby avoiding an open and creative discussion on how to design a whole new town in an area of extreme environmental significance. This is contrary to one of the “key principles of a successful EA”, which is the “consideration of a reasonable range of alternatives” (MCEA Section A.1.1). Specifically, all the options presented so far (except the do-nothing option) assume that the unquestionable goal is to maximize the area for built development, thereby keeping natural areas to the legal minimum, and almost eliminating future possibilities for restoration. Importantly, the number of dwellings that can be built in Howard/Bouffard is not limited by the land area, but by the sewage capacity allocated by the City of Windsor. Therefore, it would be perfectly reasonable to consider intermediate scenarios whereby a lower percentage of the lands available would be drained for building. The unbuilt areas of land would serve a variety of purposes, including natural floodwater management, ecological restoration and climate mitigation; and also permit existing land uses such as agriculture if desired by the landowners. It is important to point out that the existence of an approved urban boundary does not imply that the built area should be maximized within that boundary. In fact, numerous policies of the County and Town Official Plans, not to mention provincial policies, call for a mixture of land uses and densities, which would use land more efficiently and make more land available for a major goal of enhancing the natural infrastructure. Instead of starting from the assumption that wetlands and floodplains were meant to be drained, the Town can take a planning decision that will determine the locations and sequencing of built development in Howard/Bouffard, while maintaining a substantial portion of natural floodplain, and creating a great legacy for future generations.

5. The drainage study completely ignores a key environmental layer in the Essex County Official Plan as if it doesn’t exist, namely Schedule B3 (Restoration Opportunities) and the associated policies and directives. On this basis alone, the study appears to contravene clear provisions of the County Official Plan, including Section 3.4.5, which requires a very specific form of Environmental Assessment. Interestingly, in Appendix A of the drainage report, Section 2, page 9, there is a 2019 map of Natural Heritage Features that shows the extensive areas officially designated in the County OP as “Restoration Opportunities”, as well as “Proposed Natural Area Linkages.” Why has this critical information been suppressed from subsequent public information materials for both the drainage plan and the secondary plan?

6. The drainage study addresses climate change issues only for the purpose of sizing the drainage works (Section 5.4.1). No consideration is given to opportunities for Climate Change Mitigation, for example the enhancement of natural carbon sinks, as required by the MCEA Section A.1.7 and associated provincial policies.

7. All of Howard/Bouffard is within the watershed of the Detroit River, which is one of 16 Areas of Concern in Ontario identified under the Canada-US Great Lakes Water Quality Agreement. The Detroit River Canadian Cleanup (DRCC) goals for Habitat Restoration include:

“b) Aquatic & riparian habitat: protect existing deep water, coastal spawning, and tributary fish and aquatic wildlife habitat and **restore ecosystem function** in priority areas in, and **hydrologically connected to, the Detroit River**; and

d) Terrestrial habitat: protect existing natural terrestrial corridors and **restore ecosystem function** between the Detroit River and the **Ojibway Prairie Complex, the LaSalle Candidate Natural Heritage sites, and other major identified habitat sites.”**

The Howard/Bouffard area represents one of the largest ever developments within the Canadian watershed of the Detroit River. While the Area of Concern designation does not imply any additional regulatory conditions, it does highlight the importance for LaSalle to demonstrate leadership, with support from other levels of government, by imagining a better model of urban development along with habitat restoration along a river tributary as a central feature.

Conclusion

The Town of LaSalle has only one chance to ‘get it right’ in planning the largest development in its history. The old approach of draining as much land as possible for building just because it is technically feasible should be let go. A new vision should be created in which repairing our degraded and fragmented environment can be the key to developing a model community with an outstanding quality of life. A portion of the historical wetland and floodplain in Howard/Bouffard should be designated as a continuous green and blue corridor that will provide many environmental services, including receiving floodwaters in a natural setting; enabling the survival of our many rare plants and animals; and contributing significantly to climate change mitigation. This corridor will be created and restored over time, just as the planned housing developments will be phased over many years. The land available outside of this green corridor can easily meet LaSalle’s projections for housing development, with a range of density and affordability. All of this is feasible and affordable in a development project with a total value on the order of \$10 billion.

Please see the map below for a visual concept of the proposed natural corridor, to be integrated into both the drainage plan and secondary plan for Howard/Bouffard.

A BETTER OPTION: RESTORE THE CORE



April 18, 2024

Sent Via Email

Attention: [REDACTED]
[REDACTED]

***Response to February 9, 2024 Comments
Howard/Bouffard Master Drainage Study
Town of LaSalle, Ontario***

Dear [REDACTED],

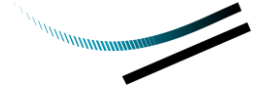
Thank you for your comments on the Howard/Bouffard Master Drainage Study (MDS). Your comments recommend a nature-based stormwater management solution for the area, with extensive ecological restoration to connect existing natural features including Ojibway National Urban Park, LaSalle Woods, and the River Canard. We appreciate the level of thought put into your feedback and your interest in ecological restoration.

The purpose of this study is to address an existing flooding issue in the Howard/Bouffard Planning Area during major storms. The Town is concurrently preparing a Secondary Plan for the Howard/Bouffard Planning Area, which will help guide development in the area. As part of the Secondary Plan, policies are being prepared to protect, enhance, and restore the area's natural heritage system. Your comments have been provided to the Secondary Plan team for consideration as they relate to land use policies.

The following list provides responses to the numbered items in your letter:

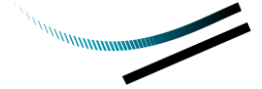
1. The purpose of this study is to evaluate alternative solutions to address an existing flooding issue during major storms in the Howard/Bouffard Planning Area, as outlined in Sections 2.0 and 2.1 of the MDS Report. The recommended solution described in Section 5.4 would address the spillover from the Turkey Creek watershed during these major events and provide a drainage system that individual developments can outlet to as the area develops. Assessing the cumulative impacts of all planned development in the Howard/Bouffard Planning Area is beyond the scope of this study.
2. The Howard/Bouffard MDS was completed in accordance with Master Plan Approach #2 as described in Appendix 4 of the Municipal Class Environmental Assessment (EA; 2023). The works required to implement the preferred solution include a new stormwater management pond and drainage works for the purpose of flood control. As outlined in Section 7.4 of the MDS Report, these works are classified as Schedule B projects under the Municipal Class EA. The MDS Report has been reviewed by the Ontario Ministry of the Environment, Conservation and

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Parks, which oversees enforcement of the Environmental Assessment Act, including compliance with the Municipal Class EA.

3. Terms of Reference are only required for Individual/Comprehensive EAs that are following Part II of the Environmental Assessment Act. This study followed the Municipal Class EA, which does not require the preparation of Terms of Reference.
4. As noted in your comments, the Municipal Class EA requires that a “reasonable range of alternatives” be considered. The alternatives considered in this study are reasonable given the range of relevant considerations in addition to environmental benefits, including property impacts and financial considerations. The alternative solution outlined in your comments would impact several existing residential dwellings along Bouffard Road and require the acquisition of a substantial portion of private lands. Due to these impacts, this alternative is not considered suitable.
5. The policy review in the MDS Report is focused on land use designations and natural environment constraints. However, the study process followed the requirements outlined in Section 3.4.5 of the County of Essex Official Plan as appropriate. The list below discusses how policies in Section 3.4.5 a) were addressed in the MDS, noting areas that are being considered as part of the Secondary Plan for the area. This information will be incorporated into a revised version of the MDS Report.
 - i) Opportunities to restore and enhance natural heritage features were reviewed and incorporated into the evaluation of alternative solutions as outlined in Section 5.2.
 - ii) Low Impact Development measures are beyond the scope of this study but may be considered as part of the Secondary Plan for the area.
 - iii) Buffers are incorporated into the typical drain cross-sections (Figures 8, 9, and 10), which will be further refined during detailed design.
 - iv) Opportunities to set aside strategic areas for restoration and enhancement may be considered as part of the Secondary Plan.
 - v) Opportunities for stewardship, naturalization, and education are beyond the scope of this study.
 - vi) Land acquisition recommended in this study is focused on lands required for the proposed drainage improvements.
 - vii) Further land acquisition or protections may be considered as part of the Secondary Plan.
6. As noted above, the purpose of this study was to develop a drainage solution that addresses existing flooding issues in the area. Climate change considerations



related to this purpose were considered as appropriate. As outlined in Section 7.5 of the MDS Report, it is anticipated the preferred solution will be refined during detailed design including opportunities to naturalize areas including the dry pond.

7. Your comments regarding the Canada-US Great Lakes Water Quality Agreement have been noted.

Thank you for your continued interest in this study. We trust these responses provide additional clarity about the matters raised in your comments.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager

cc: Peter Marra, Town of LaSalle

Our file: 18-8169

Quigley, Iain <iquigley@dillon.ca>

**Fwd: Comments regarding information in the Master Drainage Study Report,**

1 message

Hayes, Greg <ghayes@dillon.ca>
To: Iain Quigley <iquigley@dillon.ca>

Mon, Feb 12, 2024 at 12:29 PM



Greg Hayes
Associate
Dillon Consulting Limited
12 James St. N Suite 401
Hamilton, Ontario, L8R 2J9
T - 905.901.2912 ext. 3455
F - 905.901.2918
GHayes@dillon.ca
www.dillon.ca



----- Forwarded message -----

From: [REDACTED]
Date: Fri, Feb 9, 2024 at 3:02 PM
Subject: Comments regarding information in the Master Drainage Study Report,
To: <HowardBouffard@dillon.ca>
Cc: <mhernandez@dillon.ca>, Peter Marra <PMarra@lasalle.ca>

Dear Mr. Hernandez

At the Town of LaSalle Council meeting dated 28 November 2023, [REDACTED] and I appeared before Council as delegations requesting that clear language be incorporated into the study report to allow appropriate refinement to the SWM solution during detail design. We provided specific language in a written submission to Council. Unfortunately, we were not given the opportunity to review or discuss the language of the report prior to the report being completed despite the support by council.

Having reviewed the completed report after it was made available for public review, we note that the report has generally included some of the language requested, albeit with some potential ambiguity that we wish to clarify as follows:

The body of the report does not include any discussion regarding item 2 summarized in our submission to Council, which requested that consideration be given to allowing the presently dedicated Cahill spill pond to be designed to serve the combined needs of Cahill spill attenuation and the SWM needs of some development lands to the extent practical. The report only makes a broad reference related to this consideration in Table 8 (in row dated March 20, 2023) and refers to Appendix A for correspondence that discusses this item in detail. Specifically, the relevant correspondence consists of two letters, which are included in Appendix A - Section 8. The first letter is authored by [REDACTED], dated 20 March 2023 (pgs. 43-51); and, the second letter is authored by Dillon Consulting, dated 27 June 2023 (pgs. 52-54). We interpret from this correspondence that the potential for a combined SWM facility can be further explored during detailed design.

Thank You.

[REDACTED]



April 18, 2024

Sent Via Email

Attention: [REDACTED]
[REDACTED]

***Response to February 9, 2024 Comments
Howard/Bouffard Master Drainage Study
Town of LaSalle, Ontario***

Dear [REDACTED],

Thank you for your comments on the Howard/Bouffard Master Drainage Study Report. The consideration of a stormwater management facility that serves the combined needs of the Cahill spill attenuation and the stormwater needs of some development lands is outside of the scope of the Master Drainage Study; however, we appreciate that there may be opportunities for efficiencies and are generally in agreement that those opportunities be explored further during the detailed design process.

As noted in our June 27, 2023 response, each opportunity would have to be reviewed for its impact on the natural environment, maintenance, safety, etc. in addition to its hydraulic performance. Further, the design of a combined pond would have to consider the impact to the peak flows and the corresponding infrastructure downstream. It is also worth noting that the proposed spill pond in the report has been identified as a naturalized dry pond and we would recommend that naturalization be considered further as this project proceeds to detailed design.

Thank you for your continued interest in this study. We trust this will provide additional clarity about the matters raised in your comments.

Sincerely,

DILLON CONSULTING LIMITED

A handwritten signature in blue ink, appearing to read "MH", is placed above the printed name of the sender.

Mark Hernandez, P.Eng.
Project Manager

cc: Peter Marra, Town of LaSalle

Our file: 18-8169

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Dillon Consulting
Limited



WILDLIFE PRESERVATION CANADA

5420 Highway 6 North, Guelph, ON N1H 6J2

admin@wildlifepreservation.ca

wildlifepreservation.ca

1-800-956-6608

9 Feb 2024

Peter Marra, P.Eng.

Deputy Chief Administrative Officer - Town of LaSalle

5950 Malden Road,

LaSalle, Ontario, N9H 1S4

Re: Howard Bouffard Master Drainage Study, December 2023

Dear P. Marra,

Thank you for the opportunity to comment on the Howard Bouffard Master Drainage Study (MDS) prepared by the Town of LaSalle and Dillon Consulting. In my previous letter dated 25 Sept. 2023, I abstained from commenting on the preferred alternative as I was waiting for the results of a natural heritage assessment to be incorporated. In my review of the MDS I see that impacts to the natural environment have been considered as part of the evaluation of alternative solutions (Table 10), which is appreciated. Unfortunately, there were no explicit provisions or considerations made for the maintenance or restoration of terrestrial connectivity for species at risk (SAR) within the study area boundaries, therefore, **I DO NOT support Alternative 2 or 3. I DO support Alternative 1 - DO NOTHING** until a more appropriate alternative is presented, one that incorporates functional ecological corridors between key natural heritage features. Briefly, my reasoning is as follows:

- 1) In Public Information Centre #1, the map of Existing Conditions – Natural Heritage depicted four Proposed Natural Area Linkages that extended south from LaSalle Woods ESA. Two of the linkages continued south across Bouffard Road, and 1 ran west through a cluster of woodlots (PIC#1, pg. 7),
- 2) In the MDS, Alternative 1 was less preferred than the others because it would not “Introduce any new corridors or linkages to the existing natural heritage system”, whereas Alternative 2 and 3 were moderately preferred because they had the “potential to benefit terrestrial ecosystems and connectivity through new sections of open drains and widening associated with existing drains with connections to both the [West Branch Cahill] and [East Branch Cahill] Drains.” (Table 10, pg. 61),
- 3) Alternatives 2 and 3, however, would require the eventual closure of ~845 m of the West Branch Cahill drain between Bouffard Rd. and LaSalle Woods ESA, in addition to the piping of ~385 m of the realigned East Branch Cahill drain where it would meet Bouffard Rd. (Figures 5 and 6, Table 10),
- 4) The proposed closure and piping of the above stated portions of both drains, concomitant with eventual build out and increased traffic volume along Bouffard Rd., will undoubtedly result in the complete obstruction of functional connectivity for terrestrial wildlife (in particular SAR reptiles) along the three linkages referred to above,
- 5) Therefore, Alternatives 2 and 3 will result in a 75% reduction in the number of Proposed Natural Area Linkages between LaSalle Woods ESA and the natural heritage features to the south, severely undermining the Town of LaSalle’s planned natural heritage system.

Sincerely,

Jonathan D. Choquette, BSc, MLA, PhD Candidate

Lead Biologist - Ojibway Prairie Reptile Recovery, Wildlife Preservation Canada

PO Box 221, Stn. A, Windsor, ON, N9A 6K1



April 18, 2024

Sent Via Email

Wildlife Preservation Canada
5420 Highway 6 North
Guelph, Ontario
N1H 6J2

Attention: Jonathan D. Choquette, B.Sc., MLA, Ph.D. Candidate
jchoquette@wildlifepreservation.ca

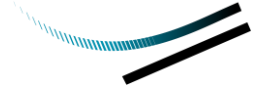
***Response to February 9, 2024 Comments
Howard/Bouffard Master Drainage Study
Town of LaSalle, Ontario***

Dear Jonathan,

Thank you for your comments on the Howard/Bouffard Master Drainage Study (MDS). Our responses below have been structured to follow the numbered items in your comments.

1. The natural area linkages shown at Public Information Centre #1 were based on the Essex Region Natural Heritage System Strategy (ERNHSS) concept prepared by the Essex Region Conservation Authority (ERCA). These linkages were shown to illustrate potential opportunities for natural area linkages in the study area. There remains opportunities to promote and enhance natural area linkages within the study area through the Secondary Plan as a mechanism to further align with the Town's natural environment policies and ERCA's overall ERNHSS vision and goals.
2. Alternative 1 (Do Nothing) was least preferred primarily because it does not address the hazards and issues associated with existing flooding in the area, as discussed in Section 5.2.2 of the MDS Report. Potential benefits to terrestrial ecosystems and connectivity were one of several criteria considered in the evaluation of alternative solutions (Table 10).
3. Impacts of Alternatives 2 and 3, including the abandonment of the West Branch Cahill Drain north of Bouffard Road and piping approximately 385 metres of the East Branch Cahill Drain, were considered in the evaluation of alternative solutions. Ultimately, Alternative 3 was selected as the preferred solution for the reasons outlined in Section 5.2.2 of the MDS Report.
4. As outlined in Table 10 of the MDS Report, the preferred solution has the potential to benefit terrestrial ecosystems and connectivity through new sections of open drains and widening of existing drains. It is anticipated the Town will refine the preferred solution during the future detailed design stage, including opportunities for naturalization as noted in Section 7.5.

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5. The Town is currently preparing a Secondary Plan for the Howard/Bouffard Planning Area, which will help guide development in the area. Your comments have also been provided to the Secondary Plan team for consideration as they relate to land use policies, including opportunities to restore and enhance natural linkages in the area.

Thank you for your continued interest in this study. We trust these responses will provide additional clarity about the matters raised in your comments.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager

cc: Peter Marra, Town of LaSalle

Our file: 18-8169



Hayes, Greg <ghayes@dillon.ca>

FW: Howard Bouffard Drainage Study comment letter

Hayes, Greg <ghayes@dillon.ca>

Tue, Sep 3, 2024 at 10:29 AM

To: Jonathan Choquette <jchoquette@wildlifepreservation.ca>

Cc: Peter Marra <pmarra@lasalle.ca>, "Hernandez, Mark" <mhernandez@dillon.ca>, Iain Quigley <iquigley@dillon.ca>

Mr. Choquette,

Thanks for your questions.

The solution presented at PIC 2 would have required acquisition of 3 residential properties. This solution further involved abandoning the West Branch Cahill Drain north of Bouffard Road, similar to the recommended solution outlined in the Master Drainage Study Report. The recommended solution was revised to, in part, reduce the impact to the existing residents.

This study is now closed with respect to consultation. The Town is working on transitioning the project into the detailed design phase, with an ultimate goal to be under construction in the next 1 – 3 years. Depending on the process utilized for the detailed design phase, there may be opportunity for additional consultation through that phase. Please accept this as our final response to your comments on this study.

Best,
Greg



Greg Hayes
Associate
Dillon Consulting Limited
12 James St. N Suite 401
Hamilton, Ontario, L8R 2J9
T - 905.901.2912 ext. 3455
GHayes@dillon.ca
www.dillon.ca

Upcoming vacation: I will be away from September 18 to October 4, 2024, inclusive.

On Fri, Aug 16, 2024 at 11:06 AM Jonathan Choquette <jchoquette@wildlifepreservation.ca> wrote:
Hello Greg,

From your attachment, I see that 3 residential properties would have to be acquired for an open drain (east branch cahill) to cross bouffard, correct? Would the west branch of the cahill drain still cross Bouffard as an open drain?

-Jonathan

On 2024-07-23 09:45, Hayes, Greg wrote:

> Mr. Choquette,

>

> Thank you for your continued interest in this study. As laid out in
> the Master Drainage Study Report, this study presents a preferred
> drainage solution to a conceptual design level of detail. A solution
> involving an open drain crossing Bouffard Road was considered as part
> of PIC 2, as shown in Appendix A to the Master Drainage Study Report
> (pages 14-17 of Appendix A - Section 5 as posted on the Town's
> website; link below). This solution was determined to be unsuitable
> given the impacts to existing residential dwellings along Bouffard
> Road, and was not recommended.

>

> [https://urldefense.com/v3/__https://www.lasalle.ca/en/town-hall/resources/Public-Works/Howard-Bouffard/HBMDS/Appendix_A_-_Section_5-compressed.pdf__;!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCcP-IOgsfTNUjQ3xqlvd18AfAIdSc1CR4PxS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_yQ6JdmIZ\\$](https://urldefense.com/v3/__https://www.lasalle.ca/en/town-hall/resources/Public-Works/Howard-Bouffard/HBMDS/Appendix_A_-_Section_5-compressed.pdf__;!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCcP-IOgsfTNUjQ3xqlvd18AfAIdSc1CR4PxS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_yQ6JdmIZ$)

>

> The specific location of terrestrial habitat improvements identified

> as part of the preferred solution will be determined through the

> detailed design phases for this project and the ongoing Secondary

> Plan. This study has now completed public consultation activities and

> future comment responses may be deferred to the next phases of design.

> As the project identified in the Master Drainage Study Report is taken

> to the next phases of design, additional consultation and natural

> heritage review opportunities may be provided.

>

> Regards,

> Greg

>

> Greg Hayes

> _Associate_

> Dillon Consulting Limited

> 12 James St. N Suite 401

> Hamilton, Ontario, L8R 2J9

> T - 905.901.2912 ext. 3455

> GHayes@dillon.ca

> <http://www.dillon.ca> [5]

>

> On Wed, Jul 17, 2024 at 11:27 AM Jonathan Choquette

> <jchoquette@wildlifepreservation.ca> wrote:

>

>> Hi again Mr. Hayes, sorry for the delay.

>>

>> You must forgive me for belaboring the point, but if you are

>> increasing

>> the length of piped drainage channels from Bouffard Rd running

>> north,

>> how could this possibly increase terrestrial connectivity between

>> natural habitats north and south of Bouffard Rd? You state this

>> sweeping

>> statement "There is an opportunity for these wider open drains to be

>>

>> naturalized to create riparian areas that would benefit terrestrial

>> ecosystems and connectivity. " but fail to indicate more precisely

>> where

>> exactly terrestrial connectivity would be improved (between which

>> natural habitat patches). I understand that these channels have a

>> primary purpose to convey water, however, if there is a genuine

>> desire

>> to seek secondary benefits (such as connectivity for terrestrial

>> wildlife and species at risk), then there must be an alternative to

>> piping the drains for hundreds of meters.

>>

>> Thank You,

>> --

>> Jonathan D. Choquette, BSc, MLA, PhD

>> Lead Biologist - Ojibway Prairie Reptile Recovery,

>> Wildlife Preservation Canada

>> email: [jchoquette\[at\]wildlifepreservation.ca](mailto:jchoquette[at]wildlifepreservation.ca) [1]

>> mail: PO Box 221 Stn A., Windsor, ON, N9A 6K1

>> web:

>>

> [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr51fkWPy\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr51fkWPy$)

>>

>> site-web (français):

>>

> [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-ojibway/__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr4UCIGAy\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-ojibway/__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr4UCIGAy$)

>>

>> publications:

>> scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao [2]

>>

>> On 2024-06-07 11:47, Hayes, Greg wrote:

>>> Hi Mr. Choquette,

>>>

>>> We have reviewed your response below and can provide the following
>>> additional details for clarification.

>>>

>>> The preferred solution replaces existing agricultural drainage
>> ditches

>>> with wider open drainage channels in some areas, and creates new
>>> sections of open drain in other areas. There is an opportunity
>> for

>>> these wider open drains to be naturalized to create riparian areas
>>> that would benefit terrestrial ecosystems and connectivity.

>>>

>>> As noted in our previous response, the Town plans to consider
>>> opportunities for naturalization along with other refinements
>> during

>>> detailed design, which could provide a range of ecological
>> benefits.

>>> For example, with wider open drains, there is more space for
>> diverse

>>> vegetation, a greater variety of microhabitats, more stable
>> aquatic

>>> conditions for aquatic species, and better accessibility for
>> larger

>>> wildlife (e.g., deer). Additionally, the edges and banks of the
>>> drains will be planted with native species to enhance the

>> corridors

>>> for pollinators, amphibians, reptiles, etc. that rely on
>>> interconnected habitats.

>>>

>>> The detailed design will aim to balance the effectiveness of the
>>> drains to function as their intended use (water management) while
>> also

>>> integrating ecological enhancements.

>>>

>>> The Town is also considering natural linkage enhancements
>> throughout

>>> the area as part of the ongoing preparation of the Howard/Bouffard
>>> Secondary Plan.

>>>

>>> We trust this response will provide the additional clarity you
>> were
>>> seeking.

>>>

>>> Sincerely,

>>> Greg

>>>

>>> Greg Hayes

>>> _Associate_

>>> Dillon Consulting Limited

>>> 12 James St. N Suite 401

>>> Hamilton, Ontario, L8R 2J9

>>> T - 905.901.2912 ext. 3455

>>> GHayes@dillon.ca

>>> <http://www.dillon.ca> [3]

>>>

>>> _Inclusiveness: Enabling belonging to draw strength from our
>>> differences._

>>>

>>> On Thu, May 30, 2024 at 11:05 AM Jonathan Choquette

>>> <jchoquette@wildlifepreservation.ca> wrote:

>>>

>>>> Hi Mr. Hayes,

>>>>

>>>> Thank you for your response letter. Unfortunately, your responses

>>>> failed

>>>> to provide additional clarity about the matters raised in my

>> comment

>>>>

>>>> letter from 9 Feb 2024. Your statement "the preferred solution

>> has

>>>> the

>>>> potential to benefit terrestrial ecosystems and connectivity

>> through

>>>> new

>>>> sections of open drains and widening of existing drains." lacks

>> any

>>>> substance given the details of the plan. Do you have any evidence

>> to

>>>>

>>>> support that claim?

>>>>

>>>> Thank you,

>>>> --

>>>> Jonathan D. Choquette, BSc, MLA, PhD

>>>> Lead Biologist - Ojibway Prairie Reptile Recovery,

>>>> Wildlife Preservation Canada

>>>> email: jchoquette[at]wildlifepreservation.ca [1] [1]

>>>> mail: PO Box 221 Stn A., Windsor, ON, N9A 6K1

>>>> web:

>>>>

>>>

>>

> [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJl5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxLrOW3LM\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJl5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxLrOW3LM$)

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>>>> site-web (français):

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> [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-ojibway/__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJl5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxP7CYLde\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-ojibway/__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJl5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxP7CYLde$)

>>>>

>>>> publications:

>>>> scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao [2]

>> [2]

>>>>

>>>> On 2024-04-18 15:26, Hayes, Greg wrote:

>>>>> Hi Jonathan,

>>>>>

>>>>> Attached please find a response to the comments you sent below

>>>>> regarding the Howard/Bouffard Master Drainage Study.

>>>>>

>>>>> Kind regards,

>>>>> Greg

>>>>>

>>>>> Greg Hayes

>>>>> _Associate_

>>>>> Dillon Consulting Limited

>>>>> 12 James St. N Suite 401

>>>>> Hamilton, Ontario, L8R 2J9

>>>>> T - 905.901.2912 ext. 3455

>>>>> F - 905.901.2918

>>>>> GHayes@dillon.ca
>>>>> <http://www.dillon.ca> [2]
>>>>> [3] [4] [5]
>>>>>
>>>>> On Fri, Feb 9, 2024 at 10:33 AM Peter Marra
>> <pmarra@lasalle.ca>
>>>>> wrote:
>>>>>
>>>>>> Another submission to review.
>>>>>>
>>>>>> Peter Marra, P.Eng.
>>>>>> Deputy Chief Administrative Officer
>>>>>> Town of LaSalle
>>>>>>
>>>>>> -----Original Message-----
>>>>>> From: Jonathan Choquette <jchoquette@wildlifepreservation.ca>
>>>>>> Sent: Friday, February 9, 2024 10:27 AM
>>>>>> To: Peter Marra <pmarra@lasalle.ca>
>>>>>> Cc: Jeff Renaud <jrenaud@lasalle.ca>; Michael Akpata
>>>>>> <makpata@lasalle.ca>; arricio-spagnuolo@lasalle.ca; Sue
>>>>>> Desjarlais
>>>>>> <sdesjarlais@lasalle.ca>; Mark Carrick <mcarrick@lasalle.ca>;
>>>>>> Crystal Meloche <cmeloche@lasalle.ca>; Marc Bondy
>>>>>> <mbondy@lasalle.ca>
>>>>>> Subject: Howard Bouffard Drainage Study comment letter
>>>>>>
>>>>>> [You don't often get email from
>>>> <jchoquette@wildlifepreservation.ca>.]
>>>>>> Learn why this is important at
>>>>>>
>>>>>>
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>>>>>>
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>>>>>> > [https://urldefense.com/v3/__https://aka.ms/LearnAboutSenderIdentification__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGu3Nj52I\\$](https://urldefense.com/v3/__https://aka.ms/LearnAboutSenderIdentification__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGu3Nj52I$)
>>>>>>]
>>>>>>
>>>>>>> Hello Mr. Marra and Town of LaSalle Mayor and Council,
>>>>>>>
>>>>>>> On behalf of Wildlife Preservation Canada, please see my
>>> attached
>>>>>>> comment letter on the Howard Bouffard Drainage Study.
>>>>>>>
>>>>>>> Thank You!
>>>>>>> --
>>>>>>> Jonathan D. Choquette, BSc, MLA, PhD Candidate Lead Biologist -
>>>>>>> Ojibway Prairie Reptile Recovery, Wildlife Preservation Canada
>>>>>>> email: jchoquette@wildlifepreservation.ca
>>>>>>> mail: PO Box 221 Stn A., Windsor, ON, N9A 6K1
>>>>>>> web:
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>>>>>>> > [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGlrHgztc\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGlrHgztc$)
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>>>>>>>> site-web (français):
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> [https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-objibway/__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGim0YluD\\$](https://urldefense.com/v3/__http://www.wildlifepreservation.ca/fr/retablissement-des-reptiles-de-la-prairie-objibway/__;!!Lf6Qiy2W1hJLYg5QahE!xuFV71GiAUc7R8v_hk7Nx3t8NBG_ENNd2deU0IBtKt0YRdgaAGegen60mV8yCXiDrblqnEiXGim0YluD$)
>>>>>
>>>>> publications:
>>>>> scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao [2]
>> [2]
>>>> [1]
>>>>> CAUTION: This email originated from outside of the
>> organization.
>>>>> Please verify that the sender's name matches the e-mail address
>>>> in
>>>>> the From: field. Do not click links or open attachments unless
>>>> you
>>>>> recognize the sender and know the content is safe. REF:
>>>>> nYDLiTtcjACbqBae
>>>>>
>>>>> This message is directed in confidence solely to the person(s)
>>>> named
>>>>> above and may contain privileged, confidential or private
>>>> information
>>>>> which is not to be disclosed. If you are not the addressee or an
>>>>> authorized representative thereof, please contact the
>> undersigned
>>>> and
>>>>> then destroy this message.
>>>>>
>>>>> Ce message est destiné uniquement aux personnes indiquées dans
>>>>> l'entête et peut contenir une information privilégiée,
>>>>> confidentielle ou privée et ne pouvant être divulguée. Si
>> vous
>>>>> n'êtes pas le destinataire de ce message ou une personne
>>>> autorisée
>>>>> à le recevoir, veuillez communiquer avec le soussigné et
>> ensuite
>>>>> détruire ce message.
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>>>>>
>>>>> Links:
>>>>> -----
>>>>> [1]
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> [https://urldefense.com/v3/__https://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxAffUXT\\$](https://urldefense.com/v3/__https://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxAffUXT$)
>> [3]
>>>>>
>>>>> [2] <http://www.dillon.ca>
>>>>> [3]
>>>>>
>>>>
>>>>
> [https://urldefense.com/v3/__https://www.linkedin.com/company/dillon-consulting-limited__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxIJ7Przb\\$](https://urldefense.com/v3/__https://www.linkedin.com/company/dillon-consulting-limited__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPpIVciP0RX_nhfjphxIJ7Przb$)
>>>>>
>>>>> [4]
>>>>>
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> https://urldefense.com/v3/__https://twitter.com/Consult_Dillon__;!!Lf6Qiy2W1hJLYg5QahE!

1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8I
GpPpIVciP0RX_nhfjphxI9EKbP8\$

>>>>

>>>>> [5]

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>>>

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> [https://urldefense.com/v3/__https://www.instagram.com/dillonconsulting__;!!Lf6Qiy2W1hJLYg5QahE!](https://urldefense.com/v3/__https://www.instagram.com/dillonconsulting__;!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8I)

1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8I

GpPpIVciP0RX_nhfjphxHdssQ9o\$

>>>

>>> This message is directed in confidence solely to the person(s)

>> named

>>> above and may contain privileged, confidential or private

>> information

>>> which is not to be disclosed. If you are not the addressee or an

>>> authorized representative thereof, please contact the undersigned

>> and

>>> then destroy this message.

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>>> Ce message est destiné uniquement aux personnes indiquées dans

>>> l'entête et peut contenir une information privilégiée,

>>> confidentielle ou privée et ne pouvant être divulguée. Si vous

>>> n'êtes pas le destinataire de ce message ou une personne

>> autorisée

>>> à le recevoir, veuillez communiquer avec le soussigné et ensuite

>>> détruire ce message.

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>>> Links:

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>>> [1]

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> [https://urldefense.com/v3/__http://wildlifepreservation.ca__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vrAx_BV2\\$](https://urldefense.com/v3/__http://wildlifepreservation.ca__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vrAx_BV2$)

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>>> [2]

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> [https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr3tQbls\\$](https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__;!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OI59ey6J67Qvb3pTbZ_bc0zbQYMkMhm7MVf9JoBejqanxbuThAB7tlb81vr3tQbls$)

>> [4]

>>> [3] <http://www.dillon.ca>

>

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> à le recevoir, veuillez communiquer avec le soussigné et ensuite

> détruire ce message.

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> Links:

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> [1] [https://urldefense.com/v3/__http://wildlifepreservation.ca__;!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCCP-IOgsfTNUJq3xqlvd18AfAldSc1CR4PxS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_ydzuPoJD\\$](https://urldefense.com/v3/__http://wildlifepreservation.ca__;!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCCP-IOgsfTNUJq3xqlvd18AfAldSc1CR4PxS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_ydzuPoJD$)

> [2] https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__;!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCCP-IOgsfTNUJq3xqlvd18AfAldSc1CR4P

xS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_ya2uYA9I\$

> [3]

> [https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPplVciP0RX_nhfjphxAffUXT\\$](https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__!!Lf6Qiy2W1hJLYg5QahE!1OUCuOLfj3_V2v9N7SEZ10fGH-cyNBGKRvBQB9-RtYTTAXICJI5NH2QE3K5XbaKlrTR8lGpPplVciP0RX_nhfjphxAffUXT$)

> [4]

> [https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OIl59ey6J67Qvb3pTbZ_bc0zbQYmKMHm7MVf9JoBejqanxbuThAB7tlb81vr3tQblsl\\$](https://urldefense.com/v3/__http://scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao__!!Lf6Qiy2W1hJLYg5QahE!wvSwQ_zhkKV08rL2BoBFe8w129SZ8OIl59ey6J67Qvb3pTbZ_bc0zbQYmKMHm7MVf9JoBejqanxbuThAB7tlb81vr3tQblsl$)

> [5] <http://www.dillon.ca>

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Jonathan D. Choquette, BSc, MLA, PhD

Lead Biologist - Ojibway Prairie Reptile Recovery, Wildlife Preservation

Canada

Post-doctoral Fellow, University of Windsor

email: jchoquette@wildlifepreservation.ca

mail: PO Box 221 Stn. A, Windsor, ON, N9A 6K1

web: https://urldefense.com/v3/__http://www.wildlifepreservation.ca/ojibway-prairie-reptile-recovery/_!!Lf6Qiy2W1hJLYg5QahE!xap9-RDRShGCcP-IOgsfTNUJq3xqlvd18AfAIdSc1CR4P

xS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_yX0LMJgq\$

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xS4toTDGSwByEzYHLSB3coodftpFxH1Zc_jR8pdH_5_yZoH0G_U\$

publications: scholar.google.com/citations?user=A1u1BqYAAAAJ&hl=fr&oi=ao



Caldwell First Nation

14 Orange Street, Leamington, Ontario, N8H 1P5

Phone: 519-322-1766 Fax: 519-322-1533

Minister of the Environment Conservation and Parks
Ministry of Environment Conservation and Parks
777 Bay Street 5th Floor
Toronto, Ontario, M7A 2J3
minister.MECP@ontario.ca

AND

Director, Environmental Assessment Branch
Ministry of Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario, M4V 1P5
EABDirector@ontario.ca

February 5, 2023

Re: Howard/Bouffard Master Drainage Study Municipal Class EA Request for Bump-Up Order Section 16

Caldwell First Nation is requesting the Minister of the Environment, Conservation and Parks to bump-up the Comprehensive Environmental Assessment (EA) using a Section 16 Order to a Class/Individual EA for the project known as the Howard/Bouffard Master Drainage Study. The Town of LaSalle is completing the Howard Bouffard Secondary Plan and as part of this plan they have completed the Howard-Bouffard Master Drainage Study. Caldwell First Nation has concerns about the potential to cause adverse impacts on our Constitutionally protected Aboriginal Rights. Specifically, the drainage study recommendations will result in disruption of an ecosystems and biodiversity of a nearby National Urban Park of which Caldwell is co-governing and will impact a culturally significant site known as Turkey Creek which houses unregistered archeological sites and burial mounds. The Master Drainage Study proposes to develop many existing greenfield sites causing an increase in impervious surfaces leading to an increase in the quantity of stormwater which will impact/disrupt the unregistered burial grounds located within the Turkey Creek watershed. The Study area has three major drains include the Cahill, East Branch Cahill and West Branch Cahill. The Cahill Drain collects flows and eventually outlets to Turkey Creek near Sprucewood Avenue, west of the study area.

The stormwater management recommendations will also impact the ecosystem and biodiversity of the site of the National Ojibway Urban Park of which Caldwell First Nation is pursuing co-governance of with Parks Canada. Caldwell First Nation is asserting their rights and responsibilities to steward the lands within the Ojibway Urban Park lands.

Caldwell First Nation initially met with the Town of LaSalle on August 2, 2023 to discuss the project, we indicated an intent to be consulted but expressed a need for capacity funding to review the project and the need to sign an agreement to secure the funding. We sent drafted agreements to LaSalle on August 11th, 2023. On January 8th, 2024 the project consultants from Dillon Consulting sent a Notice of Completion for the Master Drainage Study. January 18th, 2024 the Town of LaSalle finally returned the signed capacity agreement to review the project and uploaded project materials into our consultation portal. The deadline to complete a review and submit comments on this Drainage Study is February 9th, 2024. Three weeks of time for review and to prepare comments is an insufficient period of time and does not afford us the opportunity to complete a fulsome consultation process with the Town of LaSalle. We have reached out to the Town to request additional time to review, provide comments and to engage in consultation.

Several amendments to the Study are necessary including the record of Indigenous Community Engagement which does not reflect any of the conversations that occurred between Caldwell First Nation and the Town or the consulting firm Dillon Consulting. The Town does not list any engagement with Caldwell First Nation which is inaccurate given our record of meetings and discussion.

Additionally, Section 4.2 Natural Environment does not list acknowledgement of the LaSalle Wood Evaluated Provincially Significant Wetland adjacent to Normandy Street. The Natural Heritage section does not list all the Endangered Species, Species of Special Concern and Threatened Species identified on the provinces Natural Heritage Information Centre. The following species were not identified: the Wood Thrush, Eastern Wood Peewee, Climbing Prairie Rose, Purple Twayblade, White Colicroot, Eastern Flowing Dogwood, Willow-leaved Aster, Pugnose Minnow, Eastern Meadowlark, Snapping Turtle, Yellow breasted Chat, Pugnose Shiner, and American Chestnut.

The Alternative #3 which was chosen as the preferred option proposes to construct a stormwater management pond directly adjacent to a Butternut Tree & Willow Leaf Aster. Both species are of special importance to the nation and will require significant accommodations for any impacts that might occur to these species.

Caldwell requests that the Minister of MECP issue a Section 16 Order to bump up the Individual EA to a Comprehensive EA and place conditions on the proponent that they conduct meaningful consultation with Caldwell First Nation and conduct further study into the impact of Alternative Solution #2 on Turkey Creek (culturally significant site) and the impact on wildlife for severing the existing ecological corridor. Meaningful consultation is providing Caldwell First Nation a reasonable and sufficient period of time to complete a review of the Master Drainage Study recommendations, meet with us to listen to our concerns, address our concerns and amend the report and or accommodate where they cannot address our concerns.

Respectfully,

A handwritten signature in black ink, appearing to read 'Zack Hamm', with a stylized flourish at the end.

Zack Hamm, R, MA,
Department Manager
Environment & Consultation Department
Caldwell First Nation
14 Orange St. Leamington Ontario
226-936-2940
ecd.manager@caldwellfirstnation.ca

cc. Mark Hernandez (howardbouffard@dillon.ca) and Peter Marra (pmarra@lasalle.ca)



Hayes, Greg <ghayes@dillon.ca>

Howard Bouffard Master Drainage Study Comments

Natalya Garrod <natalya.garrod@caldwellfirstnation.ca>

Wed, Feb 14, 2024 at 4:21 PM

To: Peter Marra <pmarra@lasalle.ca>, gbeegs@lasalle.ca

Cc: Zack Hamm <ecd.manager@caldwellfirstnation.ca>, Jenna Maidment <landguardian@caldwellfirstnation.ca>, "Hernandez, Mark" <mhernandez@dillon.ca>, Greg Hayes <ghayes@dillon.ca>

Hello Peter and Gudrin,

I would like to loop both of you into the same email chain as it has become clear that Consultation on the Master Drainage Study and the Secondary Plan itself have been two separate processes.

I would like to start by identifying our differing worldviews: The Town of LaSalle views the two projects as compartmentalized - one file in the engineering department and the second file in the planning department. The First Nation tends to have a worldview that "everything is interconnected". This worldview is based on the fact that the water (drainage) and the use of land are inextricably linked and not separate from one another as they will inform and impact one another. The Consultation process thus far has been confusing given the different worldviews.

I would recommend that Peter and Gudrin share communications that has occurred between Caldwell and the Town so that we are all on the same page.

Moving forward, it would be most helpful if the municipality took a one-window approach to Consultation or to include all relevant parties in communications to avoid misunderstandings on who to consult with and when to consult. We can talk about this at the upcoming proposed meeting meant to discuss the general best practices of Consultation with First Nations (specifically Caldwell). **Can we please schedule a meeting on this specific topic, separate from project files?**

To set the record straight, consultation with LaSalle on the Secondary Plan started last August 2023 while it appears that the start of Consultation on the Drainage Study occurred only as recently as January 8th 2024 when we received the Notice of Completion of the EA. If this is true, Caldwell should have been consulted prior to the completion of the first draft of the EA and during the review of the alternatives/options.

When Caldwell originally sent the agreement to consult with LaSalle on Howard Bouffard we originally understood it to mean that the agreement for capacity funding would apply to both projects. Please confirm that this is your understanding.

Additionally, we would like to schedule a meeting on the drainage study to address the concerns outlined in the submission of comments.

To help inform your approach to consultation with First Nations I have put together a small list of resources on consultation and highlighted some key information.

Thank you,

Natalya Garrod, RPP, MCIP
Technical Advisor to Caldwell First Nation

On Wed, Feb 14, 2024 at 10:28 AM Peter Marra <pmarra@lasalle.ca> wrote:

Natalya,

Thank you for the info. We are working on getting you some of the info that you requested. Hopefully, soon you will see some additional info.

It appears we are mixing up both the Howard/Bouffard Secondary Plan and the Howard/Bouffard Master Drainage Study which are two different projects. Interrelated, but certainly different process'.

I will review available times with the team and get back to you about meeting and hopefully, at that meeting we can clarify everything on each project and how and what has been communicated to date on the Master Drainage study. I think we will also get Gudrin involved in this meeting to clarify projects and consultation for each.

Please be advised that Gudrin is still working through the secondary plan and I understand she continues to be involved with Caldwell and expanding the consultation on the secondary plan.

Regards,

Peter Marra, P.Eng.

Deputy Chief Administrative Officer

Town of LaSalle

From: Natalya Garrod <natalya.garrod@caldwellfirstnation.ca>

Sent: Wednesday, February 14, 2024 9:38 AM

To: Peter Marra <pmarra@lasalle.ca>

Cc: Zack Hamm <ecd.manager@caldwellfirstnation.ca>; Jenna Maidment <landguardian@caldwellfirstnation.ca>; Hernandez, Mark <mhernandez@dillon.ca>; Greg Hayes <ghayes@dillon.ca>

Subject: Re: Howard Bouffard Master Drainage Study Comments

You don't often get email from natalya.garrod@caldwellfirstnation.ca. [Learn why this is important](#)

Hello Peter,

Thank you for confirming receipt of our comments and committing to a response.

In our records of consultation we have noted that Gurdin Beggs wrote to Caldwell to introduce the project on August 2, 2023. Our letter accidentally referred to a "meeting" with LaSalle however this was mischaracterized. On August 11, 2023 Zack Hamm responded to Gurdin and sent agreements.

I will consult with Zack and see if he can find the email chain and send them over to you.

We would really appreciate a meeting to chat about this project and our comments. What is your availability like next week?

Looking forward to hearing from you,

Natalya Garrod, RPP, MCIP

Technical Advisor to Caldwell First Nation

On Mon, Feb 12, 2024 at 12:23 PM Peter Marra <pmarra@lasalle.ca> wrote:

Natalya, Zack and Jenna,

The information has been received and we will provide you with a formal response shortly on all matters.

In Caldwell's submission, you make note that a meeting occurred on Aug 2, 2023, and that an agreement was sent through on Aug 11, 2023.

I don't have any record of these. I have gone back through all my meetings around then, and emails and I can't find anything relative to the Howard/Bouffard Master Drainage study. Maybe I have misplaced something.

I am wondering if you could assist me in understanding any correspondence on this matter of the August 2023 conversations, info exchange, agreement, etc. Who at the Town did you meet with, who did you send the agreement too, etc.

I was on vacation at that time, so maybe during my time away, I missed something.

This would help move this forward.

I also think it might be good to meet and discuss your concerns with you and then for us to provide a formal written response. Hopefully, you think this is a good idea as well, let us know.

Regards,

Peter Marra, P.Eng.

Deputy Chief Administrative Officer

Town of LaSalle

From: Natalya Garrod <natalya.garrod@caldwellfirstnation.ca>

Sent: Tuesday, February 6, 2024 5:05 PM

To: Peter Marra <pmarra@lasalle.ca>; HowardBouffard@dillon.ca; mhernandez@dillon.ca; ghayes@dillon.ca

Cc: Jenna Maidment <landguardian@caldwellfirstnation.ca>; Zack Hamm <ecd.manager@caldwellfirstnation.ca>

Subject: Howard Bouffard Master Drainage Study Comments

You don't often get email from natalya.garrod@caldwellfirstnation.ca. [Learn why this is important](#)

Hello Peter,

Thank you for speaking with Natalya over the phone this afternoon. This email is meant to provide notice that Caldwell First Nation has some outstanding concerns regarding the Master Drainage Study for the Howard Bouffard Secondary Plan.

Recommended Amendments to the Master Drainage Study

- 1.
- 2.
3. The Environment and Consultation Department (ECD) requires an amendment to Section 3.10
4. Engagement with Indigenous Communities and Appendix A Consultation Materials - Section 9 of the Howard Bouffard Drainage Study draft to reflect the engagement between Caldwell and the Town of LaSalle. Caldwell First Nation initially met with the Town of LaSalle
5. on August 2, 2023 to discuss the project, we indicated an intent to be consulted but expressed a need for capacity funding to review the project and the need to sign an agreement to secure the funding. We sent drafted agreements to LaSalle on August 11th,
6. 2023. On January 8th,
7. 2024 the project consultants from Dillon Consulting sent a Notice of Completion for the Master Drainage Study. January 18th,
8. 2024 the Town of LaSalle returned the signed capacity agreement to review the project and uploaded project materials into our consultation portal. The deadline to complete a review and submit comments on this Drainage Study is February 9th,
9. 2024. Three weeks of time for review and to prepare comments is an insufficient period of time and does not afford us the opportunity to complete a fulsome consultation process with the Town of LaSalle.
- 10.
- 11.
12. Due to the high volume of projects that ECD must prioritize and respond to, completing
13. a fulsome review of the Drainage Study by February 9, 2024 is not possible. The 30 day review period mandated by MECP is both inadequate and not conducive to the capacity level of ECD. For these reasons Caldwell First Nation ECD requires an accommodated review
14. period which extends to February 23, 2024. It is essential that ECD is able to complete a proper review of this Drainage Study.
- 15.
- 16.
- 17.
- 18.
- 19.
- 20.
21. Section 4.2 Natural Environment does not list acknowledgement of the LaSalle Wood Evaluated

22. Provincially Significant Wetland adjacent to Normandy Street. The Natural Heritage section does not list all the Endangered Species, Species of Special Concern and Threatened Species identified on the provinces Natural Heritage Information Centre. The following
23. species were not identified: the Wood Thrush, Eastern Wood Peewee, Climbing Prairie Rose, Purple Twayblade, White Colicroot, Eastern Flowing Dogwood, Willow-leaved Aster, Pugnose Minnow, Eastern Meadowlark, Snapping Turtle, Yellow breasted Chat, Pugnose Shiner,
24. and American Chestnut.
- 25.
26. Please provide rationale for why these natural heritage features are not acknowledged
27. in the report or ensure that the natural heritage section is amended and adequately considers the impacts to these natural heritage resources.
- 28.
- 29.
- 30.
- 31.
- 32.
- 33.
34. The Alternative #3 which was chosen as the preferred option proposes to construct a stormwater
35. management pond directly adjacent to a Butternut Tree & Willow Leaf Aster. Both species are of special importance to the nation and will require significant accommodations for any impacts that might occur to these species.
- 36.
37. Consultation with Caldwell on the impact to both species and mitigation measures
38. for anticipated impacts will be necessary.
- 39.

Concerns over the Howard Bouffard Secondary Plan & Impacts from Stormwater

Caldwell anticipates a high increase to stormwater overflows with the proposed build out of the Howard Bouffard Secondary Plan area which proposes to change a large portion of Greenfield sites into developed areas. What are the anticipated stormwater impacts as a result of this build-out? Caldwell would like to raise our concerns regarding the impact/disruption to the unregistered burial grounds located within the Turkey Creek watershed. Turkey Creek contains unregistered archaeological sites. Caldwell also has concerns about the impact of this development on the ecosystem and biodiversity of the site of the National Ojibway Urban Park of which Caldwell First Nation is pursuing co-governance of with Parks Canada. Caldwell First Nation is asserting their rights and responsibilities to steward the lands within the Ojibway Urban Park lands.

Requests for Town of LaSalle

Caldwell requests:

- 1.
- 2.
3. A meeting with yourself and Dillon consulting (who prepared the report) to discuss these
4. outstanding concerns.
- 5.
- 6.
- 7.
8. Amendments to the Master Drainage Study be considered or rationale provided for why requests
9. cannot be accommodated.
- 10.

- 11.
- 12.
13. A copy of the Turkey Creek Watershed Study, comments from the Essex Region Conservation
14. Authority on the Master Drainage Study.
- 15.
- 16.
- 17.
18. A plain language explanation of the Master Drainage Study be provided.
- 19.
- 20.

Miigwech,

Natalya Garrod, RPP, MCIP

Caldwell First Nation

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Resources on Consultation with First Nations.docx
18K



Hayes, Greg <ghayes@dillon.ca>

Howard Bouffard Master Drainage Study Comments

Peter Marra <pmarra@lasalle.ca>

Thu, Feb 22, 2024 at 11:32 AM

To: Natalya Garrod <natalya.garrod@caldwellfirstnation.ca>, "HowardBouffard@dillon.ca" <HowardBouffard@dillon.ca>, "mhernandez@dillon.ca" <mhernandez@dillon.ca>, "ghayes@dillon.ca" <ghayes@dillon.ca>

Natalya,

Enclosed are ERCA's comments on the Howard/Bouffard Master Drainage Study.

I will send you the Turkey Creek study under a separate cover. It is a large file and I will need to use the Town's large file transfer program. The Turkey Creek Watershed study was a study led and completed by ERCA and was used as background information for our Howard/Bouffard Master Drainage Study.

As for the plain language description, Dillon is currently working on that, once finalized, I will send it over to you.

Regards,

Peter Marra, P.Eng.

Deputy Chief Administrative Officer

Town of LaSalle

From: Natalya Garrod <natalya.garrod@caldwellfirstnation.ca>

Sent: Thursday, February 22, 2024 11:17 AM

To: Peter Marra <pmarra@lasalle.ca>; HowardBouffard@dillon.ca; mhernandez@dillon.ca; ghayes@dillon.ca

Subject: Re: Howard Bouffard Master Drainage Study Comments

You don't often get email from natalya.garrod@caldwellfirstnation.ca. [Learn why this is important](#)

Hello Peter,

I am preparing official comments for the Master Drainage Study that I hope to submit to you by tomorrow. I could really use a copy of the Turkey Creek Watershed study and any conservation authority comments received thus far.

Also that plain language description of the drainage solution proposed would be good.

Thanks!

Natalya

On Tue, Feb 6, 2024 at 5:05 PM Natalya Garrod <natalya.garrod@caldwellfirstnation.ca> wrote:

Hello Peter,

Thank you for speaking with Natalya over the phone this afternoon. This email is meant to provide notice that Caldwell First Nation has some outstanding concerns regarding the Master Drainage Study for the Howard Bouffard Secondary Plan.

Recommended Amendments to the Master Drainage Study

1. The Environment and Consultation Department (ECD) requires an amendment to Section 3.10 Engagement with Indigenous Communities and Appendix A Consultation Materials - Section 9 of the Howard Bouffard Drainage Study draft to reflect the engagement between Caldwell and the Town of LaSalle. Caldwell First Nation initially met with the Town of LaSalle on August 2, 2023 to discuss the project, we indicated an intent to be consulted but expressed a need for capacity funding to review the project and the need to sign an agreement to secure the funding. We sent drafted agreements to LaSalle on August 11th, 2023. On January 8th, 2024 the project consultants from Dillon Consulting sent a Notice of Completion for the Master Drainage Study. January 18th, 2024 the Town of LaSalle returned the signed capacity agreement to review the project and uploaded project materials into our consultation portal. The deadline to complete a review and submit comments on this Drainage Study is February 9th, 2024. Three weeks of time for review and to prepare comments is an insufficient period of time and does not afford us the opportunity to complete a fulsome consultation process with the Town of LaSalle.

Due to the high volume of projects that ECD must prioritize and respond to, completing a fulsome review of the Drainage Study by February 9, 2024 is not possible. The 30 day review period mandated by MECP is both inadequate and not conducive to the capacity level of ECD. For these reasons Caldwell First Nation ECD requires an accommodated review period which extends to February 23, 2024. It is essential that ECD is able to complete a proper review of this Drainage Study.

2. Section 4.2 Natural Environment does not list acknowledgement of the LaSalle Wood Evaluated Provincially Significant Wetland adjacent to Normandy Street. The Natural Heritage section does not list all the Endangered Species, Species of Special Concern and Threatened Species identified on the provinces Natural Heritage Information Centre. The following species were not identified: the Wood Thrush, Eastern Wood Peewee, Climbing Prairie Rose, Purple Twayblade, White Colicroot, Eastern Flowing Dogwood, Willow-leaved Aster, Pugnose Minnow, Eastern Meadowlark, Snapping Turtle, Yellow breasted Chat, Pugnose Shiner, and American Chestnut.

Please provide rationale for why these natural heritage features are not acknowledged in the report or ensure that the natural heritage section is amended and adequately considers the impacts to these natural heritage resources.

3.

The Alternative #3 which was chosen as the preferred option proposes to construct a stormwater management pond directly adjacent to a Butternut Tree & Willow Leaf Aster. Both species are of special importance to the nation and will require significant accommodations for any impacts that might occur to these species.

Consultation with Caldwell on the impact to both species and mitigation measures for anticipated impacts will be necessary.

Concerns over the Howard Bouffard Secondary Plan & Impacts from Stormwater

Caldwell anticipates a high increase to stormwater overflows with the proposed build out of the Howard Bouffard Secondary Plan area which proposes to change a large portion of Greenfield sites into developed areas. What are the anticipated stormwater impacts as a result of this build-out? Caldwell would like to raise our concerns regarding the impact/disruption to the unregistered burial grounds located within the Turkey Creek watershed. Turkey Creek contains unregistered archaeological sites. Caldwell also has concerns about the impact of this development on the ecosystem and biodiversity of the site of the National Ojibway Urban Park of which Caldwell First Nation is pursuing co-governance of with Parks Canada. Caldwell First Nation is asserting their rights and responsibilities to steward the lands within the Ojibway Urban Park lands.

Requests for Town of LaSalle

Caldwell requests:

1. A meeting with yourself and Dillon consulting (who prepared the report) to discuss these outstanding concerns.
2. Amendments to the Master Drainage Study be considered or rationale provided for why requests cannot be accommodated.
3. A copy of the Turkey Creek Watershed Study, comments from the Essex Region Conservation Authority on the Master Drainage Study.
4. A plain language explanation of the Master Drainage Study be provided.

Miigwech,

Natalya Garrod, RPP, MCIP

Caldwell First Nation

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ERCA - Howard-Bouffard Master Drainage Study - Final Report (Feb 8, 2024).pdf

1275K



Caldwell First Nation

14 Orange Street, Leamington, Ontario, N8H 1P5

Phone: 519-322-1766 Fax: 519-322-1533

To: Peter Marra,
Deputy Chief Administrative Officer
Town of LaSalle

Cc. Gudrin Beggs,
Director of Planning & Development
Town of LaSalle

RE: Master Drainage Study Review and Comments from Caldwell First Nation

Report Review and Comments

Thank you for the opportunity to participate in the review of the Howard Bouffard Master Drainage Study. Caldwell First Nation submits the following comments. We look forward to discussing these comments and receiving your response.

Reference	Text Example	Comments
Section 3.10 Engagement with Indigenous Communities and Appendix A Consultation Materials - Section 9 of the Howard Bouffard Drainage Study	<p>Table 9 outlines comments received from Indigenous communities throughout the study and project team responses, where required. No further comments or questions have been received from Indigenous communities regarding the project to date.</p> <p>Table 9 only includes comments from COTTFN and Aamjiwnaang First Nation.</p>	<p>This section does not reflect any of the conversations that occurred between Caldwell First Nation and the Town or the consulting firm Dillon Consulting.</p> <p>Caldwell First Nation initially met with the Town of LaSalle on August 2, 2023 to discuss the Secondary Plan. We indicated an intent to be consulted but expressed a need for capacity funding to review the project and the need to sign an agreement to secure the funding. We sent drafted agreements to LaSalle on August 11th, 2023. January 18th,</p>

		<p>2024 the Town of LaSalle returned the signed capacity agreement to review the project and uploaded project materials into our consultation portal. We understood the agreements to apply to review and comments on both the Secondary Plan and the Drainage Study for the area.</p> <p>We would appreciate the record of meetings and communication from Caldwell to be included in the Indigenous Communities Comments Section.</p>
Section 4.2 Natural Environment	<p>These functions include providing habitat/potential habitat for several Species at Risk (SAR) listed as Endangered or Threatened under the Ontario Endangered Species Act, 2007 (ESA), including:</p> <ul style="list-style-type: none"> • Butler's Gartersnake (<i>Thamnophis butleri</i>); • Eastern Foxsnake (<i>Pantherophis gloydi</i>); • Massasauga Rattlesnake (<i>Sistrurus catenatus</i>); • Butternut (<i>Juglans cinerea</i>); • Red Mulberry (<i>Morus rubra</i>); • Bats (<i>Myotis</i> sp., <i>Perimyotis subflavus</i>); • Willowleaf Aster (<i>Symphyotrichum praealtum</i>); <p>and,</p> <ul style="list-style-type: none"> • Dense Blazing Star (<i>Liatris spicata</i>). 	<p>The list of key natural heritage features on the study area does not acknowledge the LaSalle Wood Evaluated Provincially Significant Wetland adjacent to Normandy Street. The Natural Heritage section does not list all the Endangered Species, Species of Special Concern and Threatened Species identified on the provinces Natural Heritage Information Centre. The following species were not identified: the Wood Thrush, Eastern Wood Peewee, Climbing Prairie Rose, Purple Twayblade, White Colicroot, Eastern Flowing Dogwood, Willow-leaved Aster, Pugnose Minnow, Eastern Meadowlark, Snapping Turtle, Yellow breasted Chat, Pugnose Shiner, and American Chestnut.</p> <p>Please provide rationale for why these natural heritage features are not acknowledged in the report or ensure that the natural heritage section is amended and adequately considers the impacts to these natural heritage resources.</p>


Figure 7: Alternative #3	Comments relate to the map provided on page 59 of the study titled Alternative 3 Conceptual Layout.	<p>The Alternative #3 which was chosen as the preferred option proposes to construct a stormwater management pond directly adjacent to a Butternut Tree & Willow Leaf Aster. Both species are of special importance to the nation and will require significant accommodations for any impacts that might occur to these species. Consultation with Caldwell on the impact to both species and mitigation measures for anticipated impacts will be necessary.</p> <p>Has LaSalle completed a Butternut Health Assessment on the butternut tree? Does the butternut have an canker?</p> <p>Should the butternut tree require removal to conduct the stormwater management pond construction, Caldwell requests that LaSalle collect seeds from the butternut tree prior to removal. The nation's replacement ratio for butternut removal is 40:1.</p>
Section 6.2. Natural Environment	There is potential for Species at Risk (SAR) and/or significant natural features to be impacted by the proposed works. This report recommends a natural environment impact assessment be completed during future design phases to identify direct impacts based on specific construction plans	Looking at the Natural Heritage Mapping it is observed that the proposed stormwater management facility is located within the portion of the study area where there is the highest concentration of natural heritage features (woodlot, SAR species habitat, rare vegetation community, special concern and rare wildlife species). These features are anticipated to be impacted by construction of this facility through impacts associated with noise, dust, and debris.
Section 6.4.1. Archeological Resources	Portions of the project area retain archaeological potential	Prior to any additional archeological work being

	<p>and will require Stage 2 archaeological assessment prior to any ground disturbing activities. Areas of archaeological potential are outlined in this report, along with next steps and other requirements related to archaeology.</p>	<p>completed a notification should be sent to Caldwell First Nation as we have field liaison monitors who will attend the archeological study to oversee the work. An Agreement must be signed between the Town and the Nation to initiate the process and for the nation to recuperate the costs of the monitors time.</p> <p>Caldwell would like to raise our concerns regarding the impact/disruption to the unregistered burial grounds located within the Turkey Creek watershed. Turkey Creek contains unregistered archaeological sites. Caldwell also has concerns about the impact of this development on the ecosystem and biodiversity of the site of the National Ojibway Urban Park of which Caldwell First Nation is pursuing co-governance of with Parks Canada. Caldwell First Nation is asserting their rights and responsibilities to steward the lands within the Ojibway Urban Park lands</p>
Section 6.3.2. Stormwater management facility	<p>The preferred solution involves improving portions of the WBC and EBC Drains, creating sections of new open channel and underground drain pipes, and abandoning a portion of the WBC Drain.</p>	<p>The stormwater management facility should be naturalized.</p> <p>Have you considered how you could increase the size of the existing wetlands on the site to use a nature-based climate solution?</p>
Section 5.4.1. Climate Change Considerations	<p>This section discusses the considerations given to assess the resiliency of the preferred solution to withstand storm events larger than a 1-in-100 year event, either in terms of peak intensity or total volume. Storms of this magnitude can be</p>	<p>How will the Town maintain the stormwater management facilities to ensure they are adequately addressing impacts of climate change? What level of monitoring and inspection will occur to ensure the anticipated volume and intensity are being adequately</p>

	associated with impacts due to climate change.	addressed? What pollution monitoring will occur to ensure there is no spill out into groundwater? What features will be incorporated into the design of the facility to prevent sedimentation into the water? Will the new facilities be stress tested?
--	------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

While Caldwell First Nation does not object to the Master Drainage Study Alternative #3 in principle, we have outstanding questions and concerns that must be addressed prior to finalizing the drainage study. Mainly our concerns revolve around the fact that the natural heritage impact assessment has not been completed prior to the finalizing of the Drainage Study. We believe this study would help inform the review of the various alternatives considered. Our major concern is that the proposed stormwater management facility is located within the concentration of the key natural heritage features and has potential to impact SAR habitat. Please notify us should a MECP permit become required. We look forward to receiving the further Archeological Assessments that have been recommended and intend to provide a review and comments. There are some amendments that were required to document the most up-to-date consultation that has occurred with Caldwell First Nation.

Respectfully,



Zack Hamm, R. MA,
 Department Manager
 Environment & Consultation Department
 Caldwell First Nation
 226-936-2940
ecd.manager@caldwellfirstnation.ca

May 24, 2024

Sent via email: ecd.manager@caldwellfirstnation.ca

Attention: Zack Hamm, R, MA, Department Manager
Environment & Consultation Department
Caldwell First Nation

**Response to Comments Regarding the Howard/Bouffard Master
Drainage Study
Town of LaSalle, Essex County, Ontario**

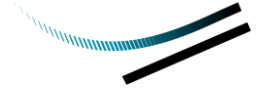
Further to our meeting of May 8, 2024, this letter provides a formal response to the questions and concerns raised in the following submissions regarding the Howard/Bouffard Master Drainage Study (MDS):

- Your Section 16 Order request, sent via email on February 9, 2024;
- Natalya Garrod's February 6, 2024 email; and,
- Your comment letter sent via email on February 23, 2024.

For ease of reference, **Table 1** below duplicates the table in your February 23 letter, with the project team's responses included in an additional column on the right. Responses to comments that were raised elsewhere in your communications but not in the table from the February 23 letter are provided below.

- In the last paragraph of your February 23 letter, you requested that Caldwell First Nation be notified should a permit from the Ministry of the Environment, Conservation and Parks become required;
 - This requirement has been noted by the Town.
- The last paragraph of your February 23 letter notes that Caldwell First Nation is concerned that the natural heritage impact assessment has not been completed prior to finalizing the MDS, noting this study would help inform the review of the alternatives;

3200 Deziel Drive
Suite 608
Windsor, Ontario
Canada
N8W 5K8
Telephone
519.948.5000
Fax
519.948.5054

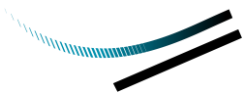


- The level of detail provided in this study is in line with the requirements for a Master Plan following Approach 2 in the Municipal Class Environmental Assessment (EA; 2023). This approach involves selection of a preferred solution, with the majority of design refinements completed following the Class EA study.
- As outlined in Section 6.2 of the MDS Report, a high-level impact assessment was completed as part of this study to inform the recommendations. As the detailed design process unfolds, a more detailed assessment of impacts can be completed as recommended in the MDS Report.
- In Ms. Garrod's February 6 email, she asked about the anticipated stormwater impacts of the build-out of the Howard/Bouffard Planning Area.
 - With respect to the MDS, the work completed meets with the requirements of professional standards, the Town of LaSalle, and the Essex Region Conservation Authority. Care has been taken to analyze the anticipated flows and volumes, provide a conservative level of service, and consider the impacts of climate change.
 - With respect to the development lands, the stormwater management will similarly be required to abide by the local guidelines and will be subject to review and approval by the Town and Conservation Authority.



Table 1: February 23, 2024 Comments and Project Team Responses

MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 3.10 Engagement with Indigenous Communities and Appendix A Consultation Materials - Section 9 of the Howard Bouffard Drainage Study	<p>Table 9 outlines comments received from Indigenous communities throughout the study and project team responses, where required. No further comments or questions have been received from Indigenous communities regarding the project to date.</p> <p>Table 9 only includes comments from COTTFN and Aamjiwnaang First Nation.</p>	<p>This section does not reflect any of the conversations that occurred between Caldwell First Nation and the Town or the consulting firm Dillon Consulting.</p> <p>Caldwell First Nation initially met with the Town of LaSalle on August 2, 2023 to discuss the Secondary Plan. We indicated an intent to be consulted but expressed a need for capacity funding to review the project and the need to sign an agreement to secure the funding. We sent drafted agreements to LaSalle on August 11th, 2023. January 18th, 2024 the Town of LaSalle returned the signed capacity agreement to review the project and uploaded project materials into our consultation portal. We understood the agreements to apply to review and comments on both the Secondary Plan and the Drainage Study for the area.</p> <p>We would appreciate the record of meetings and communication from Caldwell to be included in the Indigenous Communities Comments Section.</p>	<p>This matter has been addressed in email exchanges and discussions following submission of the comments. The MDS Report did not include a record of consultation with Caldwell First Nation regarding the Secondary Plan because the MDS is a separate study. In addition, as the MDS Report was finalized in December 2023, it did not document consultation that occurred in 2024.</p> <p>A revised version of the MDS Report is being prepared, which will include updates to Section 3.10 and Appendix A to incorporate consultation that occurred in 2024 regarding the MDS.</p>



MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 4.2 Natural Environment	<p>These functions include providing habitat/potential habitat for several Species at Risk (SAR) listed as Endangered or Threatened under the Ontario Endangered Species Act, 2007 (ESA), including:</p> <ul style="list-style-type: none">• Butler’s Gartersnake (<i>Thamnophis butleri</i>);• Eastern Foxsnake (<i>Pantherophis gloydi</i>);• Massasauga Rattlesnake (<i>Sistrurus catenatus</i>);• Butternut (<i>Juglans cinerea</i>);• Red Mulberry (<i>Morus rubra</i>);• Bats (<i>Myotis</i> sp., <i>Perimyotis subflavus</i>.);• Willowleaf Aster (<i>Symphyotrichum praealtum</i>); and,• Dense Blazing Star (<i>Liatris spicata</i>).	<p>The list of key natural heritage features on the study area does not acknowledge the LaSalle Wood Evaluated Provincially Significant Wetland adjacent to Normandy Street. The Natural Heritage section does not list all the Endangered Species, Species of Special Concern and Threatened Species identified on the provinces Natural Heritage Information Centre. The following species were not identified: the Wood Thrush, Eastern Wood Peewee, Climbing Prairie Rose, Purple Twayblade, White Colicroot, Eastern Flowing Dogwood, Willow-leaved Aster, Pugnose Minnow, Eastern Meadowlark, Snapping Turtle, Yellow breasted Chat, Pugnose Shiner, and American Chestnut.</p> <p>Please provide rationale for why these natural heritage features are not acknowledged in the report or ensure that the natural heritage section is amended and adequately considers the impacts to these natural heritage resources.</p>	<p>The presence of Provincially Significant Wetlands within the Study Area is mentioned in the list of designated natural features in Section 4.2. The Provincially Significant Wetlands adjacent to Normandy Street are not specifically noted in the report because they are greater than 120 metres from the drainage improvements. Section 6.2 will be revised to clarify that it is focused on the area within 120 metres of the drainage improvements, as is typical for this kind of natural environment impact assessment.</p> <p>With respect to SAR, Section 4.2 is focused on those species that were observed in the area during the previous field surveys outlined in that section. The wording of Section 4.2 will be adjusted to clarify this. As outlined in Section 4.2, these previous studies included SAR screenings, Ecological Land Classification (ELC), botanical assessments, amphibian surveys, breeding bird surveys, and aquatic assessments. The studies were completed in support of Environmental Impact Assessments for individual private landowners within the Study Area. As part of the MDS, aquatic assessments and a site reconnaissance visit were conducted in 2022 to confirm presence of previously documented significant natural features identified in the above-noted Environmental Impact Assessments.</p> <p>Section 6.2 of the MDS Report recommends additional natural environment impact assessment during detailed design to identify direct impacts based on specific construction plans, with site-specific environmental management plans developed where required prior to construction.</p>



MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Figure 7: Alternative #3	Comments relate to the map provided on page 59 of the study titled Alternative 3 Conceptual Layout.	<p>The Alternative #3 which was chosen as the preferred option proposes to construct a stormwater management pond directly adjacent to a Butternut Tree & Willow Leaf Aster. Both species are of special importance to the nation and will require significant accommodations for any impacts that might occur to these species. Consultation with Caldwell on the impact to both species and mitigation measures for anticipated impacts will be necessary.</p> <p>Has LaSalle completed a Butternut Health Assessment on the butternut tree? Does the butternut have a canker?</p> <p>Should the butternut tree require removal to conduct the stormwater management pond construction, Caldwell requests that LaSalle collect seeds from the butternut tree prior to removal. The nation’s replacement ratio for butternut removal is 40:1.</p>	<p>As outlined in Section 6.2 of the MDS Report, additional natural environment impact assessment is planned to be completed during future design phases to identify direct impacts based on specific construction plans. A Butternut Health Assessment was not completed as part of this study; however, one may be required during detailed design depending on the proximity of the drainage works to the Butternut tree. In the event adverse impacts are anticipated once detailed design is complete, permitting and/or conditional exemptions under the Endangered Species Act would need to be initiated at that time.</p> <p>The need to consult with Caldwell First Nation in the event impacts are anticipated to the Butternut or Willow Leaf Aster has been noted by the Town, as well as the Nation’s 40:1 replacement ratio for Butternut removal.</p>



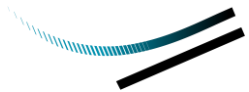
MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 6.2. Natural Environment	There is potential for Species at Risk (SAR) and/or significant natural features to be impacted by the proposed works. This report recommends a natural environment impact assessment be completed during future design phases to identify direct impacts based on specific construction plans.	Looking at the Natural Heritage Mapping it is observed that the proposed stormwater management facility is located within the portion of the study area where there is the highest concentration of natural heritage features (woodlot, SAR species habitat, rare vegetation community, special concern and rare wildlife species). These features are anticipated to be impacted by construction of this facility through impacts associated with noise, dust, and debris.	<p>Your comments have been noted. As outlined in Section 6.2 of the MDS Report, additional natural environment impact assessment is planned to be completed during future design phases to identify direct impacts based on specific construction plans.</p> <p>The drainage improvements will create a north-south corridor through the development area along with meadow habitat within the Cahill Spill Pond. The spill pond will consist of grassland when it is dry, which could be most of the year. This grassland will support several wildlife species and contribute to the natural heritage system in the area.</p>



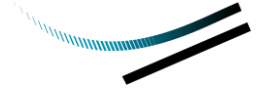
MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 6.4.1. Archeological Resources	Portions of the project area retain archaeological potential and will require Stage 2 archaeological assessment prior to any ground disturbing activities. Areas of archaeological potential are outlined in this report, along with next steps and other requirements related to archaeology.	<p>Prior to any additional archeological work being completed a notification should be sent to Caldwell First Nation as we have field liaison monitors who will attend the archeological study to oversee the work. An Agreement must be signed between the Town and the Nation to initiate the process and for the nation to recuperate the costs of the monitors time.</p> <p>Caldwell would like to raise our concerns regarding the impact/disruption to the unregistered burial grounds located within the Turkey Creek watershed. Turkey Creek contains unregistered archaeological sites. Caldwell also has concerns about the impact of this development on the ecosystem and biodiversity of the site of the National Ojibway Urban Park of which Caldwell First Nation is pursuing co-governance of with Parks Canada. Caldwell First Nation is asserting their rights and responsibilities to steward the lands within the Ojibway Urban Park lands</p>	<p>The requirement to notify Caldwell First Nation prior to any additional archaeological assessments has been noted by the Town.</p> <p>No impacts to Turkey Creek are anticipated as part of the preferred solution. The modifications to the Cahill Drain spill point will convey overflow during major storm events southward into the drainage system that is proposed by the MDS, as opposed to the existing condition where it spills into the Study Area uncontrolled. All drainage that is conveyed by the preferred solution flows into the Canard River and therefore does not impact the Turkey Creek watershed.</p> <p>As noted above, the drainage improvements will create a north-south corridor through the development area along with meadow habitat within the Cahill Spill Pond. It is anticipated opportunities for naturalization to enhance the benefits of these features will be explored during detailed design.</p> <p>Furthermore, opportunities for naturalization and enhancement of the natural heritage system throughout the Howard/Bouffard Planning Area are being considered as part of the Secondary Plan.</p>



MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 6.3.2. Stormwater management facility	The preferred solution involves improving portions of the WBC and EBC Drains, creating sections of new open channel and underground drain pipes, and abandoning a portion of the WBC Drain.	<p>The stormwater management facility should be naturalized.</p> <p>Have you considered how you could increase the size of the existing wetlands on the site to use a nature-based climate solution?</p>	<p>Your comments have been noted. It is anticipated opportunities to naturalize areas including the dry pond will be explored during detailed design, as noted in Section 7.5 of the MDS Report.</p> <p>A solution involving a broader natural area surrounding the drain was considered in response to the first comment on page 37 of the MDS Report (in Table 8: PIC 3 Public Comments). As outlined in our response to that comment, there is a need for the preferred solution to balance environmental benefits with property acquisition requirements, costs, and landowner needs.</p> <p>As noted above, opportunities for naturalization and enhancement of the natural heritage system throughout the Howard/Bouffard Planning Area are being considered as part of the Secondary Plan.</p>



MDS Reference	Text Reference	Caldwell First Nation Comments	Project Team Response
Section 5.4.1. Climate Change Considerations	This section discusses the considerations given to assess the resiliency of the preferred solution to withstand storm events larger than a 1-in-100 year event, either in terms of peak intensity or total volume. Storms of this magnitude can be associated with impacts due to climate change.	How will the Town maintain the stormwater management facilities to ensure they are adequately addressing impacts of climate change? What level of monitoring and inspection will occur to ensure the anticipated volume and intensity are being adequately addressed? What pollution monitoring will occur to ensure there is no spill out into groundwater? What features will be incorporated into the design of the facility to prevent sedimentation into the water? Will the new facilities be stress tested?	<p>As noted in Section 5.4.1 of the MDS Report, all local stormwater management (SWM) ponds within the Study Area are required to follow the regional guidelines for Windsor and Essex County include a Climate Change Stress Test. The Town’s facilities and the developers’ facilities will be subject to that requirement during detailed design. In addition, these improvements will be subject to review and approval by the Essex Region Conservation Authority.</p> <p>As noted in the last row of Table 7 of the MDS Report, the nature and timing of required maintenance will be determined by the Town in the future. Typically, maintenance of SWM ponds involves periodic clean-out of accumulated sediment (5 to 10 years) and general ground and slope maintenance with cutting and vegetation control throughout the year. The Town does not manicure its SWM ponds weekly; however, the area around the ponds is typically mowed/cut on a quarterly to annual basis.</p> <p>Section 6.6 of the MDS Report will be updated to recommend that provisions to address potential spills be developed during detailed design and incorporated into the construction contract. Typical provisions include setbacks from waterbodies for refueling equipment and preparation of a spill prevention and response contingency plan by the contractor.</p> <p>A new Section 6.3.4 has been added to recommend that erosion and sediment control provisions be developed during the detailed design phase.</p>



Thank you for your continued interest in this study. We trust that the above responses are consistent with your understanding and expectations based on our recent discussions.

As discussed in our meeting, the Secondary Plan team anticipates a public meeting and opportunities for further dialogue regarding that study in mid to late summer 2024. Notices will be sent in advance. Comments that apply to the Secondary Plan will be provided separately.

We will provide a copy of the revised MDS Report to you when it is available. At that time, we would like to understand how Caldwell First Nation wishes to proceed with respect to your Section 16 Order request and whether you find the revisions and responses adequate to resolve the concerns identified in the request.

Please contact the undersigned at HowardBouffard@dillon.ca or 519-948-4243, ext. 3242 if you have any further questions or if you would like to discuss our responses.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager
GJH:nek

cc: Peter Marra, Town of LaSalle
Natalya Garrod, Caldwell First Nation
Jenna Maidment, Caldwell First Nation
Our file: 18-8169



Hayes, Greg <ghayes@dillon.ca>

Response Letter - Howard/Bouffard Master Drainage Study

Hayes, Greg <ghayes@dillon.ca>

Tue, May 28, 2024 at 3:59 PM

To: Jenna Maidment <landguardian@caldwellfirstnation.ca>

Cc: Zack Hamm <ecd.manager@caldwellfirstnation.ca>, natalya.garrod@caldwellfirstnation.ca, Peter Marra <pmarra@lasalle.ca>, "Hernandez, Mark" <mhernandez@dillon.ca>, Iain Quigley <iquigley@dillon.ca>

Hi Jenna,

Thank you for the message, I appreciate the review and communication. We will send the revised report once it is ready.

Best,
Greg**Greg Hayes**

Associate

Dillon Consulting Limited

12 James St. N Suite 401

Hamilton, Ontario, L8R 2J9

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F - 905.901.2918

GHayes@dillon.ca

www.dillon.ca



On Tue, May 28, 2024 at 3:19 PM Jenna Maidment <landguardian@caldwellfirstnation.ca> wrote:

Good afternoon Greg,

We have reviewed the response letter and agree that our comments and concerns have been adequately addressed. Miigwech for the project team's time and consideration; the ECD will await the final copy of the report for review.

We look forward to hearing from you soon.

Miigwech,

Jenna Maidment (*she/her*)**Land Guardian - Environment and Consultation Coordinator**

Environment and Consultation Department (ECD)

**Caldwell First Nation**

14 Orange Street

Leamington | ON | N8H 1P5

Phone: +1 226-936-1093

landguardian@caldwellfirstnation.ca

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On Fri, May 24, 2024 at 2:06 PM Hayes, Greg <ghayes@dillon.ca> wrote:
Good afternoon Zack,

Attached please find a letter that responds to the comments we received from Caldwell First Nation regarding the Howard/Bouffard Master Drainage Study Report.

As noted in the letter, revisions are being made to the report and we will share a copy of the revised report with you when it is ready.

If you have any questions or concerns in the meantime, please let us know.

Kind regards,
Greg



Greg Hayes
Associate
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February 9, 2024

To whom it may concern,

Thank you for providing the Notice of Completion of the Howard-Bouffard Master Drainage Study dated January 8 2023. As stated in a previous response, the proposed project is 1) located within the McKee Treaty area to which COTTFN is a signatory, 2) is located within the BBC Additions to Reserve land selection area and 3) located in COTTFN's Traditional Territory.

After reviewing the Environmental Assessment, the Consultation Unit within the Treaties, Lands and Environment Department at COTTFN has several comments/questions:

- While we acknowledge that a Stage 2 Archaeological Assessment has been conducted for most of the area, eliminating the need for additional exploration, in those specific areas where further assessments are warranted due to their significant archaeological potential, it is imperative that COTTFN be afforded the opportunity to deploy Archaeology Field Monitors during future Archeological Assessments. Many of these sites are in areas where developers must build the stormwater ponds themselves. Please ensure that this demand is forwarded to developers.
- We have some concerns about leaving stormwater management in the hands of developers whose primary concern is to complete projects as quickly and cheaply as possible.
 - o While it is outlined where these new stormwater management ponds are located and their volume, will there be oversight from Le Salle that conditions have been met?
 - o La Salle should also put stipulations to developers that other forms of stormwater management strategies should be used like rain gardens and bioswales considering the extent of flooding that can happen in the area.
- Was their modelling completed to determine that the preferred solution would be enough to prevent flooding in this development area?
- While connecting and widening drains is a benefit to ecosystems, improving the riparian habitat around the municipal drains must be prioritized into later design phases rather than recreational trails.
- There was mention that further refinements can happen in the future, protection of significant woodlands, wetlands etc must be prioritized. Also, the SAR species and their associated habitat should be avoided.
 - o COTTN would like to be involved in future design phases and studies, especially if significant changes occur.

We look forward to continuing this open line of communication. Please continue to use NationsConnect for future conversations. To implement meaningful consultation, COTTFN has developed its own protocols - a document and a process that will guide positive working relationships. We would be happy to meet with you to review COTTFN's Consultation Protocols. As per 'Appendix C' of the Wiindmaagewin, we will be sending an invoice based on our time to review the documentation. The invoice will come from COTTFN's Finance Department. Please do not hesitate to contact me if you need further clarification of this letter.

Sincerely,
Erna Leclair
Consultation Analyst
Chippewa of the Thames First Nation
320 Chippewa Road, Muncey, ON, N0L 1Y0





Deshkan Ziibiing

Chippewas of the Thames
First Nation Treaties, Lands
and Environment

(519) 289-5555 Ext 239

emleclair@cottfn.com OR consultation@cottfn.com

320 Chippewa Road
Muncey, ON, N0L 1Y0
Tel: 519-289-5555
Fax: 519-289-2230
info@cottfn.com





Hayes, Greg <ghayes@dillon.ca>

Howard / Bouffard Master Drainage Study

Hayes, Greg <ghayes@dillon.ca>

Fri, Mar 8, 2024 at 3:22 PM

To: Erna-Marie Leclair <emleclair@cottfn.com>

Cc: "pmarra@lasalle.ca" <pmarra@lasalle.ca>, Mark Hernandez <mhernandez@dillon.ca>, "Quigley, Iain" <iquigley@dillon.ca>

Hi Erna,

Attached please find the project team's response to COTTFN's comments, which we are sending in advance of next week's virtual meeting as requested. I have also attached the comments you provided on February 9th here for ease of reference.

We look forward to meeting with you next week to discuss further.

Best,
Greg



Greg Hayes
Associate
Dillon Consulting Limited
12 James St. N Suite 401
Hamilton, Ontario, L8R 2J9
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F - 905.901.2918
GHayes@dillon.ca
www.dillon.ca



On Thu, Mar 7, 2024 at 11:11 AM Hayes, Greg <ghayes@dillon.ca> wrote:

Ok thank you Erna, I will send a Google Meet invitation shortly. Feel free to add others to the attendee list as necessary on your end, or let me know if you would like me to add them.

Thanks, and you have a good weekend too.

Greg



Greg Hayes
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On Thu, Mar 7, 2024 at 8:48 AM Erna-Marie Leclair <emleclair@cottfn.com> wrote:

Hello again Greg,

I think a virtual option might be better for everyone as it is March Break and some people may want to work from home.

Thanks! And have a great weekend!



Erna-Marie Leclair (she/her)
Consultation Analyst
Chippewas of the Thames First Nation
Email: emleclair@cottfn.com
Cell: 226-236-0816
320 Chippewa Road, Muncey, Ontario

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From: Hayes, Greg <ghayes@dillon.ca>
Sent: Wednesday, March 6, 2024 1:01 PM
To: Erna-Marie Leclair <emleclair@cottfn.com>
Cc: pmarra@lasalle.ca <pmarra@lasalle.ca>; Mark Hernandez <mhernandez@dillon.ca>; Quigley, Iain <iquigley@dillon.ca>
Subject: Re: Howard / Bouffard Master Drainage Study

You don't often get email from ghayes@dillon.ca. [Learn why this is important](#)

Hi Erna,

Tuesday at 2:00 works for us. Would you like to meet in person or virtually? We can come to your office if that is preferred, or I can set up a video call.

Thanks,
Greg



Greg Hayes
Associate
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12 James St. N Suite 401
Hamilton, Ontario, L8R 2J9
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F - 905.901.2918
GHayes@dillon.ca
www.dillon.ca



On Wed, Mar 6, 2024 at 10:50 AM Erna-Marie Leclair <emleclair@cottfn.com> wrote:

Hello Greg,

Tuesday would work the best for me! Perhaps at 2?

Erna



Erna-Marie Leclair (she/her)
Consultation Analyst
Chippewas of the Thames First Nation
Email: emleclair@cottfn.com
Cell: 226-236-0816
320 Chippewa Road, Muncey, Ontario



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From: Hayes, Greg <ghayes@dillon.ca>

Sent: Tuesday, March 5, 2024 1:25 PM

To: Erna-Marie Leclair <emleclair@cottfn.com>

Cc: pmarra@lasalle.ca <pmarra@lasalle.ca>; Mark Hernandez <mhernandez@dillon.ca>; Quigley, Iain <iquigley@dillon.ca>

Subject: Re: Howard / Bouffard Master Drainage Study

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Hi Erna-Marie,

We are available to meet during the afternoon of Tuesday, March 12 (between 1 p.m. and 4 p.m.) or anytime Thursday, March 14 (between 9:30 a.m. and 4 p.m). Is there a time during either of those windows that would work best for you?

Thanks,
Greg



Greg Hayes

Associate

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12 James St. N Suite 401

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GHayes@dillon.ca

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On Wed, Feb 28, 2024 at 3:23 PM Quigley, Iain <iquigley@dillon.ca> wrote:



Iain Quigley

Dillon Consulting Limited

235 Yorkland Boulevard Suite 800

Toronto, Ontario, M2J 4Y8

T - 416.229.4646 ext. 2053

iquigley@dillon.ca

www.dillon.ca



----- Forwarded message -----

From: Erna-Marie Leclair <emleclair@cottfn.com>

Date: Wed, Feb 28, 2024 at 3:19 PM

Subject: Re: Howard / Bouffard Master Drainage Study

To: Quigley, Iain <iquigley@dillon.ca>

Hello Iain,

It would be great to set up a meeting to go over the comments. Its always nice to hear them rather than read

it on a screen! We have open availability the week of March 11 so far! If you can please provide the comments before so we can have more of a discussion on the day that would be great!



Erna-Marie Leclair (she/her)
 Consultation Analyst
 Chippewas of the Thames First Nation
 Email: emleclair@cottfn.com
 Cell: 226-236-0816
 320 Chippewa Road, Muncey, Ontario

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From: Quigley, Iain <iquigley@dillon.ca>
Sent: Monday, February 26, 2024 2:56 PM
To: Consultation <consultation@cottfn.com>; Erna-Marie Leclair <emleclair@cottfn.com>
Cc: Greg Hayes <ghayes@dillon.ca>; Mark Hernandez <mhernandez@dillon.ca>; pmarra@lasalle.ca <pmarra@lasalle.ca>
Subject: Howard / Bouffard Master Drainage Study

You don't often get email from iquigley@dillon.ca. [Learn why this is important](#)

Good afternoon,

We have received your comments on the Howard/Bouffard Master Drainage Study dated February 9, 2024. We are in the process of preparing written responses to the comments received, and wanted to offer a meeting if it would be beneficial to discuss these items in advance.

Please call or respond to this email if you would like to arrange a meeting to discuss further along with your availability.

Thank you,
 Iain

--



Iain Quigley
Dillon Consulting Limited
 235 Yorkland Boulevard Suite 800
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iquigley@dillon.ca
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2 attachments



Response to COTTFN_March 8, 2024.pdf

691K



COTTFN Comments_February 9, 2024.pdf

159K



March 8, 2024

Chippewas of the Thames First Nation
320 Chippewa Road
Muncey, Ontario
N0L 1Y0

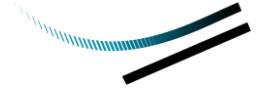
Sent via email: Erna Leclair, Consultation Analyst
emleclair@cottfn.com

3200 Deziel Drive
Suite 608
Windsor, Ontario
Canada
N8W 5K8
Telephone
519.948.5000
Fax
519.948.5054

**Howard/Bouffard Master Drainage Study
Town of LaSalle, Essex County, Ontario**

Thank you for your comments on the Howard/Bouffard Master Drainage Study Report as noted in your letter dated February 9, 2024. Our responses below have been structured to follow your questions.

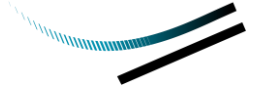
1. The Town of LaSalle (Town) will invite the Chippewas of the Thames First Nation (COTTFN) to deploy Archaeology Field Monitors during future archeological assessments of the drainage works proposed as part of this project. Further, the Town will remind developers in the study area of the need to provide this same opportunity to COTTFN in archaeological assessments required for their respective development projects.
2. The Town is currently preparing a Secondary Plan for the Howard/Bouffard Planning Area which will help guide development in the area. Your comments have been provided to the Secondary Plan team for consideration as they relate to land use policies. Further, as part of the Planning Act approval process, the Town will review and provide comments on individual development applications in the study area to ensure that legislative requirements are met. During the construction of development projects, the Town's inspector reviews the drainage works completed by developers to ensure compliance with the approved design.



3. As outlined in Section 1.1 of the Master Drainage Study Report, extensive stormwater modelling was completed as part of this study including further refinement following completion of the Turkey Creek Watershed Study. The preferred solution was developed to contain and control stormwater flows up to and including the 1:100 year event.
4. As noted in Section 7.5 of the Master Drainage Study Report, it is anticipated the Town will refine the preferred solution during the future detailed design stage, including opportunities for naturalization. The intention of the multi-use pathways is to make the corridor a feature that connects the surrounding communities. We believe that both goals can be achieved through careful consideration during the detailed design process.
5. Additional natural environment impact assessment is recommended during the detailed design stage as outlined in Section 6.2 of the report. These studies are recommended to identify potential impacts on sensitive natural features in the area and avoid or manage the impacts as required. The Town understands that COTTfN wishes to be involved, especially if there are any significant changes.

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We hope the above provides clarity around the work completed to date and the intention moving forward. We look forward to meeting with you in the coming days to discuss further.

Sincerely,

DILLON CONSULTING LIMITED

Mark Hernandez, P.Eng.
Project Manager

ICQ:mdk

Cc: Peter Marra, Town of LaSalle

Our file: 18-8169