**SLR Consulting (Canada) Ltd.**
300 Town Centre Blvd., Suite 200, Markham, ON L3R 5Z6

March 6, 2026

Attention: Ahmed Mahmoud
Elite Cap Inds Holdings Inc.,
Elite Cap PC Holdings Inc.,
Elite P.C.M. Holdings Inc.,
Elite P.C.V. Holdings Inc.,
705 Main P.C. Holdings Inc.,
Elite Capital P.C. Developments Inc., and Elite 869 Killaly Holdings Inc.
102-3410 South Service Rd.
Burlington, ON L7N3T2

SLR Project No.: 233.V65441.00001

Revision: 0

**RE: Final EIS Addendum for Elite Development Lands East of Port Colborne**
**SLR Response to Agency Comments**

# Introduction

SLR (formerly Palmer) prepared an Environmental Impact Study (EIS) for the landowners dated September 28, 2023, which was titled *Environmental Impact Study, Elite Properties East of Port Colborne*. The landowners are: Elite Cap Inds Holdings Inc., Elite Cap PC Holdings Inc., Elite P.C.M. Holdings Inc., Elite P.C.V. Holdings Inc., 705 Main P.C. Holdings Inc., Elite Capital P.C. Developments Inc., and Elite 869 Killaly Holdings Inc. This report (hereafter the EIS) was reviewed and commented on by the City of Port Colborne (the City), the Niagara Region, and the Niagara Peninsula Conservation Authority (NPCA). The EIS was completed in conjunction with the Wignell Drain Subwatershed Study (SWS), dated May 8, 2023, which is being revised in February 2026. Response comments from the agencies for the EIS are largely integrated with those of the SWS.

The City and Niagara Region comments were compiled by MHBC in April 2025 and the NPCA comments were dated May 15, 2025. There were no comments from the City on the EIS and the NPCA determined that '*staff are supportive of the 30-metre buffers proposed for all wetlands on the site and of the exception for wetland A2, for which a 15-metre buffer is proposed. NPCA staff also support the proposed 15-metre buffer for the Wignell Drain*.' NPCA noted that references to the outdated O. Reg. 155/06 should be replaced with O. Reg. 41/24 and that development will require permission and a work permit from the NPCA.

The City of Port Colborne agreed that the EIS did not require a revision (Erik Acs, Chief Planner email pers. Comm. May 22, 2025 to Rosalind Chaundy, SLR), but that an EIS Addendum was acceptable, in addition to providing responses within a comments matrix to address the Niagara Region comments. This document is the EIS Addendum and the comment matrix will be submitted by Armstrong, planners for the project; both of which will be submitted together.

The Niagara Region comments are given below in *smaller italics* with the SLR response following in standard text. Numbers given for each of the Region's comments are the comment numbers provided by the Region. Under provincial Bill 23 there have been changes to Niagara Region's role in land use planning.

As of March 31, 2025, the Niagara Official Plan is no longer a Regional Plan. It is now an official plan of the 12 local municipalities in Niagara. Thus, our understanding is that due to the reduced role of Niagara Region the City will be reviewing this EIS Addendum and associated comments matrix response.

Since the submission of the EIS in September 2023 other policy changes have occurred.

These include Ontario Regulation 41/24 (Prohibited Activities, Exemptions and Permits) which came into effect on April 1, 2024. This regulation, made under the *Conservation Authorities Act*, revoked and replaced the 36 previous individual conservation authority regulations governing, prohibited activities, exemptions and permits etc. The conservation authorities now have a reduced jurisdiction (e.g. regulated area is smaller) role in planning and their ability to comment on natural heritage features that are not watercourses, valleys and wetlands was essentially removed.

Also, the Endangered Species Act was amended in late 2025 and is anticipated to be replaced by a new act (and associated regulations), the Species Conservation Act in 2026. See additional details under comment 2.80 Bobolink Habitat below.

Attached are figures that have been updated or added as part of addressing the agency comments. These consist of:

Figure 5. Natural Heritage Constraints and Development Limit

Figure 6. Proposed Development (Revised January 29, 2026)

Figure 7. Proposed Enhancement and Compensation Areas

# Response to Niagara Region Comments

## Preamble

*2.27 Staff recommends revisions to the submitted Subwatershed Study ("SWS"), Secondary Plan and EIS and, as such, cannot support the subject applications at this time from an environmental perspective based on the detailed comments provided in Appendix 2. A meeting between agency staff (i.e., City, NPCA, Region) and subsequently the applicant would be helpful in ensuring the next submission is adequate in addressing comments and fulfilling requirements.*

SLR has completed this Addendum for the EIS and revised the SWS and met with the City of Port Colborne to ensure that changes to the development plan, from an ecological perspective, were acceptable to the City. This meeting occurred on January 9, 2026. The outcome was that the City agreed with the changes to the conceptual plan which affected the ecological features of the subject lands. These included a roadway through the A3 woodland and associated compensation, as well as changes to the proposed ecological connectivity (linkages) as described at the end of this Addendum in a section titled Changes to Concept Plan and Ecological Impacts. The meeting did not include NPCA because they were satisfied with the EIS and did not include Niagara Region due to their reduced responsibilities of the planning process.

## Linkages

*2.72 There are discrepancies between the recommendations outlined in the SWS and EIS. For example, as it relates to wildlife linkages/corridors, the SWS study acknowledges that amphibians, depending on their life cycle stage and season, require different habitats. As such, both wetland habitats for breeding and upland areas once tadpoles have transformed, are important to certain amphibians' lifecycles. However, the EIS has provided minimal connectivity between wetland and upland habitats without justification.*

*2.73 The SWS indicates that local linkages should be a minimum of 60 m wide as a target. However, the EIS outlines that 20 metres is sufficient for the subject lands. Please elaborate on why the EIS recommendations are inconsistent with the recommendations of the SWS. Further, staff note that Stormwater Management ("SWM") blocks are being utilized to provide connectivity in the Draft Plan: however, as SWM ponds are considered infrastructure, there are likely conflicts with wildlife that require further consideration (e.g., how do you mitigate amphibians and reptiles from accessing SWM infrastructure?)*

Regarding wildlife connectivity between upland and wetland habitats, it should be noted that of the seven areas of natural heritage (labelled A1 to A4 and B1 to B3 in the EIS, see Figure 5), only one wetland (A2) does not connect to an upland area. This area (A2) does not have substantive standing water after spring and thus any breeding amphibians would be able to use A2 as an upland area during the non-breeding season. Thus, all the breeding amphibians recorded in wetlands B1, B2, B3, and A2, and A4 can already easily reach suitable non-breeding, upland habitat.

The inconsistency between the EIS and the SWS in the width of the linkages was an oversight that needed further explanation and context. Both reports should have indicated that linkages could be of three types and widths:

- 60 m (or more) for more important linkages (often joining larger features),
- 20 m (or more) for local linkages, and
- Variable in width when providing linkages via stormwater management ponds.

Examples of these approaches to linkages is described below. In the EIS it is proposed that linkages occur through stormwater management facilities, which is a land use that has been shown to still provide for wildlife movement opportunities. Integration of SWM facilities is not uncommon and considered sufficient given that a) a wetland-woodland connection is already present within most natural areas and, b) no specific species were identified through the study that required ecological connectors. Many of the common small to mid-sized mammals (e.g., raccoons, squirrels) can move through residential neighbourhoods.

There will be proposed ecological connections (of no set width) using stormwater management facilities (SWMF) between: a) B2 and B3 woodland/wetlands, b) B1 to off-site areas and c) A4 to off-site areas (see Figure 7). All of these SWMF are anticipated to have naturalized areas and dry/wet forebay areas that wildlife might use. The second two are considered potential connections because the building of new road underpasses, under Elizabeth St. and Killaly St. E respectively, would be necessary to make the connection complete. Eco-passages would be expected to be built at a time of road reconstruction, subject to the completion of an environmental assessment and design feasibility for the proposed road improvements.

In the case of B1, the hydro corridor would also be used. Note that the connection from Woodland/Wetland B1 would connect to the woodland/wetland west of Elizabeth Street. The southward connection, A4 across Killaly St. E., connects to an area of undevelopable floodplain which is shown on Figures 5 and 6. The ability of stormwater ponds to act as wildlife linkages is discussed in the next paragraphs.

The stormwater management ponds proposed in the three locations discussed above would have the following characteristics: at least several meters of naturalized meadow or shrub habitat along the edge (where a maintenance road is not needed all around a pond, there will be a wider strip) and 5:1 sloped edges. Fencing around the stormwater management ponds is at the discretion of the City. For ecological purposes it is recommended that they are not fenced where they back onto natural areas. Even if they were fenced, then amphibian movement would not be stopped. The stormwater management ponds would be dredged infrequently – perhaps every 15 years – and thus would not negatively impact the kind of wildlife that might use these areas as connectors. These ponds and associated upland areas are expected to provide habitat that frogs, reptiles, and common mammals would be able to move through.

Thus, while not high-quality ecological connectors, these stormwater ponds, even if technically 'infrastructure' are expected to assist with wildlife movement and potentially provide wildlife habitat as well. This is an approach that has been implemented in many projects and accepted by agencies.

The scientific literature supports this. A comprehensive review article, *A Review of Factors That Determine Whether Stormwater Ponds are Ecological Traps and/or High Quality Breeding Sites for Amphibians* (Clevenot et al 2018) indicates that stormwater management ponds can provide habitat for amphibians and are by no means inherently 'sinks' or traps for amphibians. They indicate that some factors are more likely lead to negative effects on stormwater ponds as prospective amphibian habitat while other factors lead to positive effects. They indicate that if the ponds are connected to other natural areas (as the ones on this site would be), and if their vegetated side slope are less than 45 degrees (as here), then they are likely to be better for amphibians. Other factors for stormwater pond use by amphibians that are potentially negative at this site, according to the authors, are presence of fish, proximity to urban areas and pollutants. The article indicates that dredging can be positive when it removes invasive species and re-digs areas of the pond that are filling in.

## Drain Buffers

*2.74 The EIS recommends minimum 15 m buffers adjacent to the municipal drain that traverses the property. However, the drain corridor was also identified as providing an ecological connectivity function. Consistent with the recommendations outlined in the SWS, the ecological connectivity of almost every southern Ontario landscape can be improved through a combination of creating larger natural areas or widening connections in a variety of directions between existing natural areas (i.e., watercourses). The SWS states that all watercourses within the Study Area are also areas of potential future natural connection. As such, staff request that consideration be given to larger buffers adjacent to watercourses on the subject lands, and if no changes are recommended that justification be provided.*

SLR consider the proposed buffers to the municipal drain to be very functional given that the corridor associated with the drain is at a minimum 30 m wide (based on the 15 m drain/watercourse buffer on either side). In many places within the subject lands, the corridor will be much wider than this. In the northern two-thirds of the subject lands the floodplain generally exceeds the 15 m buffer.

Consequently, the corridor is variably between 50 to 100 m in total width. In the southern third of the subject lands there is a woodland/wetland area that widens the corridor to create a natural area that is about 250 m in width. For the types of species utilizing their areas for movement, SLR is strongly of the opinion that this linkage is functional and appropriate.

## HDFs as Connectors

*2.75 Staff note that Headwater Drainage Features (HDF's) assessed as 'conservation' and providing amphibian habitat are being kept in- situ on the landscape; however, it is unclear how these areas will be connected to appropriate habitat in the Study Area. For example, HDF-2 and HDF11b are identified as being connected to SWM ponds, which is not appropriate as SWM ponds are infrastructure that require ongoing maintenance. Staff request the applicant reconsider impacts and justification in an EIS Addendum.*

HDF2 is situated alongside features A1 and B1. These features contain both wetland and upland habitat for amphibians. HDF 11b flow will be considered when designing the SWM pond and any amphibians breeding in A4 have adjacent upland habitat within other parts of A4. That SWM ponds can act as wildlife connectors and amphibian habitat have been discussed above under comments #2.72 and 2.73. As discussed, and based on literature, SWM pond maintenance is not expected to be a negative factor for amphibians.

## Snake Survey Methodology

*2.76 As it relates to snake surveys, the EIS indicates that weathered cover boards were placed throughout the property in potential snake habitat and surveyed in 2022. Staff question why the cover boards were not revisited in 2023 & 2024. According to survey protocols it is common for coverboards to take 1 to 2 years to season and begin to attract snakes and salamanders. Please provide any relevant information/justification in an EIS Addendum.*

Snake surveys were conducted over one year, and no further surveys are planned. Several of the coverboards were already seasoned by being outdoors (in a different project location) for a few years. The Terms of Reference for the EIS (dated March 29, 2022) indicated that one year of snake surveys would occur and was sufficient and SLR is of the opinion that the level of survey effort has been appropriate to inform the EIS.

## Supporting and Enhancement Areas

*2.77 Staff note that the EIS does not assess 'supporting area and features' or 'enhancement areas', as required by NOP policies. Please include specific sections related to both in an EIS Addendum.*

In the Niagara Region OP (2022, Schedule L, Natural Environment System: Components, Definitions, & Criteria, Table 4-1), the following definitions are given.

**Supporting Features and Areas**

*Supporting features and areas means lands that have been restored or have the potential of being restored. Supporting features and areas include grasslands, meadows, and thickets (defined in accordance with Ecological Land Classification for Southern Ontario); other valleylands; and other wildlife habitat; and enhancement areas where they are determined to contribute to the biodiversity and ecological function of the natural environment system*

For any project with proposed land use changes, there can be the possibility for restoration. Based on SLR's analysis, for the subject lands there are three areas of (cultural) meadow or thicket which were recorded: a 2 ha Cultural Meadow (CUM1-1) along Killaly St.; a 2 ha Cultural Thicket (CUT1b); and a 0.8 ha Cultural Thicket (CUT1d) south of A4all shown on Figure 2 of the EIS. The latter will mostly be retained within the 30 m A4 wetland buffer. The other two areas are not proposed for retention; instead other areas (floodplain and buffers) are proposed for restoration that will provide better enhancement due to their location, through enlarging the natural features or providing connectivity. See section Non-specified Ecological Enhancement below. Finally, no discussion of retention was given when SLR was on site with Niagara Region staff, and thus we have assumed that their removal is acceptable. SLR is of the opinion that that identified restoration areas are appropriate.

'**Enhancement Areas'**

From the same section of the Niagara OP as noted above:

*Enhancement areas means ecologically supporting areas adjacent to natural heritage features and areas, key natural heritage features, key hydrologic features. They are identified where:*

1. *The area is comprised of natural vegetation communities (as determined according to Ecological Land Classification); or*
2. *The area is currently under agricultural production; or*
3. *The area does not contain a permanent form of development (i.e., house, road, or related infrastructure).*

*Enhancement areas inside of settlement areas are to be identified as follows:*

- *in 'bays and inlets' along the edge of features - < 60 m wide*
- *interior gaps in features - < 0.5 ha*
- *gaps between features - < 60 m*

There are no areas that fit the definition of enhancement area in the subject lands. There may be a few very small 'bays' that already fall within existing buffers. There are 'bays' within the floodplain; however, the floodplain is not considered a natural heritage feature per se, but rather a hazard feature and these 'bays' are in large part occupied by other natural feature buffers, or in one instance a city park.

**Non-specified Ecological Enhancement**

As noted in the EIS, Section 7.2.8, the Client is proposing to enhance all parts of the floodplain (which are undevelopable) and buffer areas that are currently within agricultural lands (see Figure 7 attached). This totals an area of 11.71 ha across the subject lands. Figure 7 illustrates the 5.83 ha of enhancement areas in buffers (bright green) and a 5.88 ha floodplain enhancement area (pale green). This enhancement would use a native species seed mix combined with small clusters of native woody species plantings to improve the natural diversity and function of the floodplain. Through time, these woody species would spread. Woody species that could be planted are listed in Section 7.2.8 of the EIS. If left unseeded or unplanted the floodplain would likely self-seed with 'weedy' herbaceous plants that would primarily be non-native. The areas in Figure 7 that are depicted by the darkest green are buffers that currently contain meadow or thicket species or scattered trees and do not need to be planted.

## Climate Change

*2.78 As it relates to climate change considerations, staff are unclear how information obtained through the SWS process was used to help inform the recommendations provided in the EIS. Please elaborate on how section 9.2 of the SWS has informed the conclusions of the EIS.*

The updated Ministry of Environment, Conservation and Parks (MECP) approach to stormwater management requires the use of the municipal Consolidated Linear Infrastructure Environmental Compliance Approval (CLI ECA) process which includes climate change considerations. The CLI ECA process will be used when designing stormwater ponds. Additionally, the presence of stormwater linkages provides further options for wildlife to move through the landscape in response to climate change.

## Sewage Pumping Station

*2.79 Staff note that there appears to be a sanitary Sewage Pumping Station ("SPS") proposed adjacent to the wetland/woodland located directly adjacent to Snider Road per the circulated Functional Servicing Report prepared by The Odan/Detech Group Inc. (dated April 18, 2024). The EIS does not address whether any potential impacts to the NES are anticipated from the SPS. Staff request the updated EIS address this item.*

The pumping station has been moved to a different location in the new Conceptual Demonstration Plan, and it is no longer adjacent to the wetland/woodland beside Snider Road. It is now adjacent to the floodplain and no impacts to natural heritage features are anticipated.

## Bobolink Habitat

*2.80 Staff request that any direction provided by the Ministry of Environment, Conservation and Parks (MECP) related to Endangered Species Act (ESA) considerations be included in an EIS Addendum. Specifically, staff require assurance that potential Bobolink habitat has been sufficiently addressed. If applicable, the Secondary Plan may need to be updated to include related policies.*

SLR will continue to inform the client of all the provincial (MECP) and federal legislative and regulatory requirements regarding Bobolink, a Species at Risk (SAR). To date, a submission to MECP has not been made regarding Bobolink. This is because, a) the date of habitat disturbance is not yet known and, b) protection of SAR habitat in Ontario is changing due to the anticipated pending repeal of the *Endangered Species Act* (ESA) in 2026, and the associated change of regulations that will be in place for the implementation of the *Species Conservation Act* (SCA). It is not known when the regulations will be released. Currently O. Reg. 830/21 applies to Bobolink habitat removal. Our understanding is that compensation through the Compensation Fund (O. Reg. 829/21 Section 90) is no longer allowed. It is SLR's understanding that once the *Species Conservation Act* replaces the ESA that Bobolink and its habitat will not be protected by the province, but by the federal *Species at Risk Act*. All migratory birds will be removed from the list of species listed for protection specifically under the SCA.

As the development approval process advances, additional breeding bird surveys will be completed in areas where Bobolink were observed to determine if the species is still present, or the proponent can assume that the species is still present. In the scenario of, assuming that the species is still present, SLR will guide Elite through any new process regarding the compensation/mitigation due to removal of Bobolink habitat.

## Potential Trail Impacts

*2.81 Staff note that a pedestrian trail network was not discussed in the EIS. If the applicant intends to create pedestrian trails within the Subject Lands, staff request that locations be considered and assessed at this stage in the process. Staff require assurance that if trails are being considered within NES features or buffers, that proper regard has been given to the width and design of buffers, etc.*

A conceptual trail network has been prepared by Armstrong Planning and Project Management. It is noted that this trail network plan is conceptual as it will be subject to detailed engineering design.

SLR has provided input to the design of the trail system from a natural heritage perspective. The City has requested that trails do not completely circumnavigate any one natural feature (January 9, 2026 meeting). Other direction from SLR includes:

- No trails within natural features
    - Except potentially only within the wetland of A4 and meadow area of B3 where: disturbance levels are already high, communities are in an early successional state, and/or trails already exist. Should the trail pass through these areas, appropriate landscape plantings could be implemented to provide for localized enhancements.
- Trails within some natural feature buffer areas are acceptable in some cases
    - But not recommended within features A1/B1 (as higher quality features)
    - Where a trail is proposed to be within a buffer, the natural feature side of the buffer could be fenced (to stop the creation of informal trails within that feature), or dense plantings (e.g., cedars) should be established to maintain use of the primary trail.
    - Any trail within B2 buffers should have appropriate landscape plantings to provide for localized enhancements.
    - Trails do not circumnavigate a feature (as City direction above)
- Trails are acceptable within the floodplain area
- Trails are acceptable within stormwater management pond areas if acceptable to City
- The existing Snider Road is a good place to maintain a trail
- Low impact design (e.g., gravel substrate or wood chips vs. asphalt) with 2.5 maximum m width where the trail is within buffer
- A buffer management and monitoring program is recommended to include parameters that address trail activities and maintenance that recognize the importance of buffer functions.

Potential disturbance to wildlife from people and pets would be minimal if these considerations are implemented.

Note that this assumes that natural areas will otherwise be inaccessible to people, because the back of residential lots or other development bordering natural features will be fenced to stop the creation of informal trails and associated disturbance within these natural areas.

Consideration will need to be given for whether stormwater management areas will be fenced; they should not lead to informal through-access to natural features but on the other hand should not cause a barrier to wildlife where being used as an ecological connector as smaller wildlife can still pass through the fence and larger species could go around it.

## Errata and Figure Updates

Wignell Drain was shown on EIS figures based NPCA Ontario drain/watercourse mapping which was in part incorrect east of Snider Road. This may have occurred because of historical changes to straightened watercourses. Figures 5 (Natural Heritage Constraints and Development Limit) and Figure 6 (Proposed Development) have been updated using current (LIO 2020) drain/watercourse mapping (and confirmed with Odan/Detech and SLR aquatic staff) and the January 29, 2026, Conceptual Master Lotting Plan. The 2024 SWS contained correct Wignell Drain mapping.

The Site Plan Approval referenced on Page 1 of the EIS should have referenced Secondary Plan Approval.

The parcel of land north of Main Street that is zoned Commercial is illustrated on the attached Figures as Other Lands Owned by Applicant (not part of EIS) because EIS studies were not conducted on this parcel.

## Changes to Concept Plan and Ecological Impacts and Gains

Figure 6 (attached) illustrates the revised concept plan prepared by Armstrong Planning and Project Management. A few plan revisions have resulted in different impacts to natural heritage features. These are shown on Figure 7 and listed and discussed below:

1. Changed configuration of linkages (discussed above under comments 2.72 and 2.73);
2. Placement of a roadway through the west edge of Woodland A3 which was not present in the 2023 EIS Development Plan (shown in purple on Figure 6) and the associated creation of a compensation woodland to the north of this near Main St. E. (shown as broadly hatched area on Figure 6 along Main St. E);
3. Variable buffers around A4 woodland/wetland
4. Gain of natural feature buffer along east side of B3, due to lot reconfiguration.
5. Addition of Figure 7 more clearly showing proposed enhancements

While numerous other changes were made to the plan, they are internal to the development footprint and do not affect natural heritage features.

**Linkage Configuration**

The changes to the proposed ecological linkages are discussed under the Linkages section above.

**Woodland A3 Encroachment**

Placing a residential roadway through the west side of Woodland A3, to gain road connection between sections of proposed houses, has been accepted by the City of Port Colborne staff. This removal of habitat is considered to have minimal impacts and is thought not to affect the function of the woodland. The piece being removed is at the edge of the woodland, there are no known sensitive species using this woodland, nor does it contain amphibian breeding habitat within it.

In order to compensate for this 0.18 ha of woodland loss, it is proposed that a larger (0.35) ha piece of (potentially developable) land to the north of this will be planted in compensation. The restoration occurring here will differ from other restoration in that it will be planted much more densely with woodland tree species.

The area planted as a woodland compensation area will be a) seeded with native, moist meadow species and b) planted fully (i.e. at a maximum density feasible for trees) with tree species including at least six of the following species, one of which should be an oak species: Shagbark and Bitternut Hickory (*Carya ovata* and *cordiformis*), Sugar and Red Maple (*Acer saccharum* and *rubrum*), Red, Swamp White, White and Bur Oak (*Quercus rubra, bicolor, alba* and *macrocarpa*) and Black Cherry (*Prunus serotina*). Tree planting coverage in the 0.35 ha compensation area should provide full coverage of that area in order to replicate a woodland. The listed species should cover 70 to 100% of the planted area, with the additional 30 to 1% consisting of other native deciduous species (or White Pine, *Pinus strobus*). The species listed are native to the region and replicate the composition of woodlands in the local area. Similarly, mainly deciduous trees are recommended as most woodlands in the local region are deciduous.

Trees should be planted at approximately 2.45 m offset in a natural manner, i.e. not in rows. Planting larger numbers of species means there is a better chance that some species will suit the local soil, and moisture conditions and provides more likelihood that at least some species will survive any climate change. Monitoring and maintenance should occur so that the majority of planted trees survive.

**A4 Variable Buffers**

To create more consistent lot depths, the standard buffers around feature A4 have been altered to be variable (or averaged). While the standard, per policy buffer widths are 10 m for woodlands and 30 m for wetlands, these have been altered, while keeping the area of the buffer the same or larger. If the standard buffer widths had been used, the area of buffer would be 1.17 ha. However, under the proposed variable buffer the area of buffer around this feature is now 1.53 ha - a larger area. The minimum buffer around the A4 woodland is now 8m (but wider than 10 m elsewhere), and the minimum buffer around the A4 wetland is 25 m (but wider than 30 m elsewhere).

Natural feature buffers are generally areas where no development occurs, however small areas of general disturbance within the buffers are acceptable during construction as long as the disturbed areas are naturalized following the disturbance.

**B3 Buffer Gain**

Along the east side of feature B3, along part of Snider Road there is an ecological gain in that the buffer is wider than required.

**Enhancement Figure 7**

A new figure (Figure 7) has been created to indicate areas of compensation and enhancement (restoration). This shows there are three types of areas for restoration: woodland compensation, buffers, and floodplain. Not all buffers are shown as restored areas because these buffers already contain naturalized areas (i.e., meadows and thickets - dark green buffers). In some places, these buffers could be improved ecologically. Specifically, in the area around B2 woodland there is a considerable amount of invasive Common Buckthorn; we recommend that this is improved by removing some of the buckthorn and replacing with native species.

# Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for Elite Developments (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.

# Closure

Regards,

**SLR Consulting (Canada) Ltd.**

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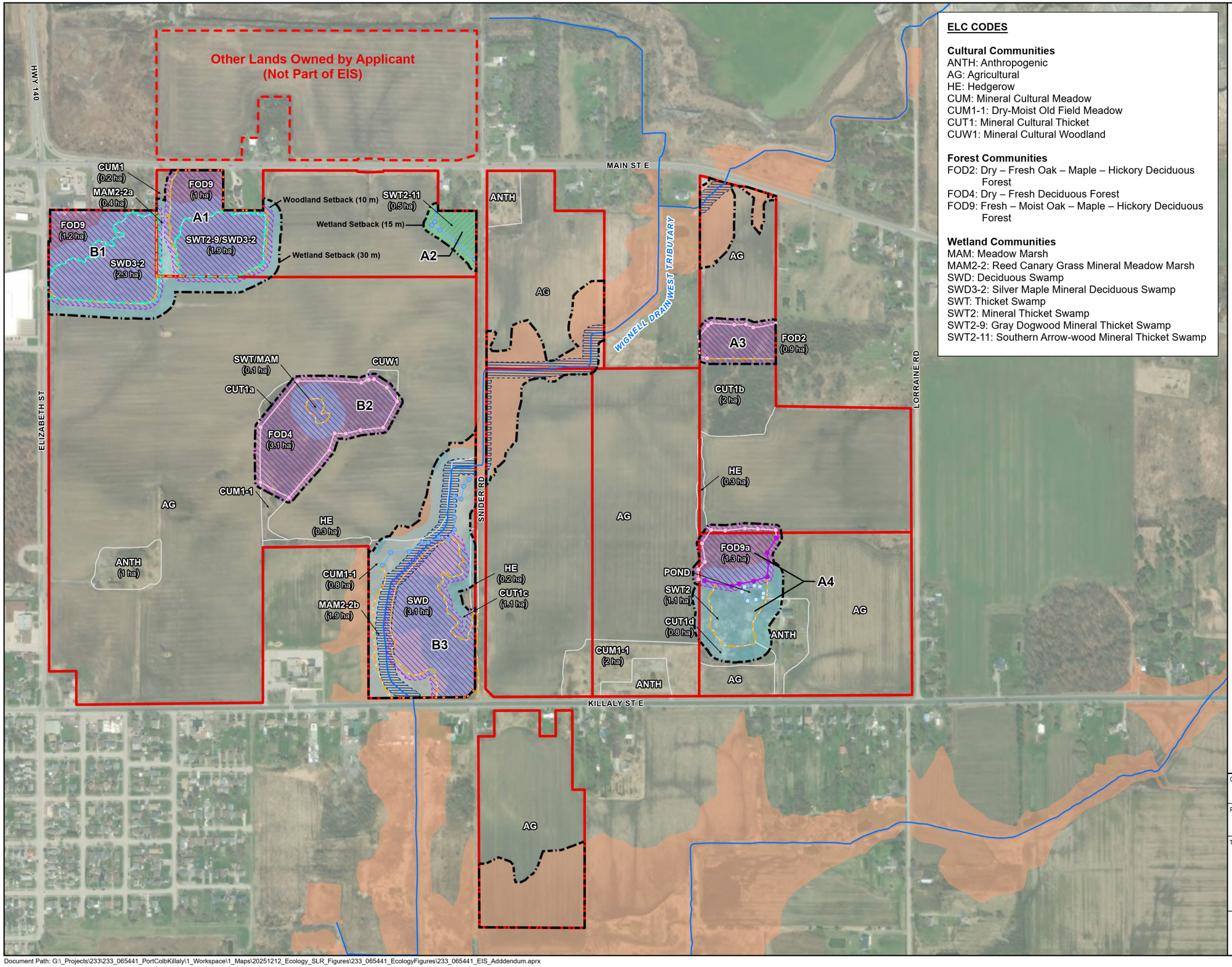
Attachments Figure 5. Natural Heritage Constraints and Development Limit
Figure 6. Proposed Development (Revised January 29, 2026)
Figure 7. Proposed Enhancement and Compensation Areas

Copy: Andrea Camina Medina, Armstrong
Paul Hecimovic, The Odan/Detech Group Inc.
Dirk Janas, Jesse Snider, SLR Consulting

# References

Clevenot, L., C. Carre, and P Pech. 2018. A Review of Factors That Determine Whether Stormwater Ponds are Ecological Traps and/or High Quality Breeding Sites for Amphibians. Frontiers in Ecology and Evolution. Vol 6:40. doi: 10.3389/fevo.2018.00040.




**ELC CODES**

**Cultural Communities**
ANTH: Anthropogenic
AG: Agricultural
HE: Hedgerow
CUM: Mineral Cultural Meadow
CUM1-1: Dry-Moist Old Field Meadow
CUT1: Mineral Cultural Thicket
CUW1: Mineral Cultural Woodland

**Forest Communities**
FOD2: Dry – Fresh Oak – Maple – Hickory Deciduous Forest
FOD4: Dry – Fresh Deciduous Forest
FOD9: Fresh – Moist Oak – Maple – Hickory Deciduous Forest

**Wetland Communities**
MAM: Meadow Marsh
MAM2-2: Reed Canary Grass Mineral Meadow Marsh
SWD: Deciduous Swamp
SWD3-2: Silver Maple Mineral Deciduous Swamp
SWT: Thicket Swamp
SWT2: Mineral Thicket Swamp
SWT2-9: Gray Dogwood Mineral Thicket Swamp
SWT2-11: Southern Arrow-wood Mineral Thicket Swamp

LEGEND

Drainage Features:
- Municipal Drain-Important/Marginal Fish Habitat[1]
- Municipal Drain-Important/Marginal Fish Habitat w/ 15 m Buffer

Woodland Features:
- Surveyed - Woodland (Nov 18th, 2021)
- Surveyed Woodland (Sept 14th, 2022)
- Significant Woodland w/ 10 m Buffer

Wetland Features:
- Surveyed Wetland (Sept 14th, 2022)
- Evaluated Non-PSW Wetland [1]
- Other Wetland or Woodland Boundary [2]
- Wetlands w/Variable Buffer (30m except SWH)

Wildlife Feature:
- Significant Wildlife Habitat w/ 15m Buffer

Other Features:
- Floodplain[3]
- ELC Community
- Development Boundary as Per Policy
- Subject Properties of Elite Developments (142.2 ha)

1. Land Information Ontario (LIO)
2. All surveyed, LIO, and additional wetland and woodland features as shown on this map have been agreed upon between NPCA, Niagara Region, and SLR (Formerly Palmer) (Sept 2022).
3. Niagara Peninsula Conservation Authority (NPCA) as updated by Odan de Tech.

**Notes:**
- A1, B1, etc = Natural Areas

0 100 200 300 400
METRE SCALE

North American Datum 1983
Universal Transverse Mercator Projection Zone 17

Scale: 1:7,000
Page Size: Tabloid (11 x 17 inches)

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Date: Feb 20, 2026

NORTH

Source Notes: Base imagery (2018) provided by South Western Ontario Orthophotography Project (SWOOP). Contains information licensed under the Open Government Licence – Ontario.

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PROJECT EIS Addendum for Elite Developments East of Port Colborne

TITLE

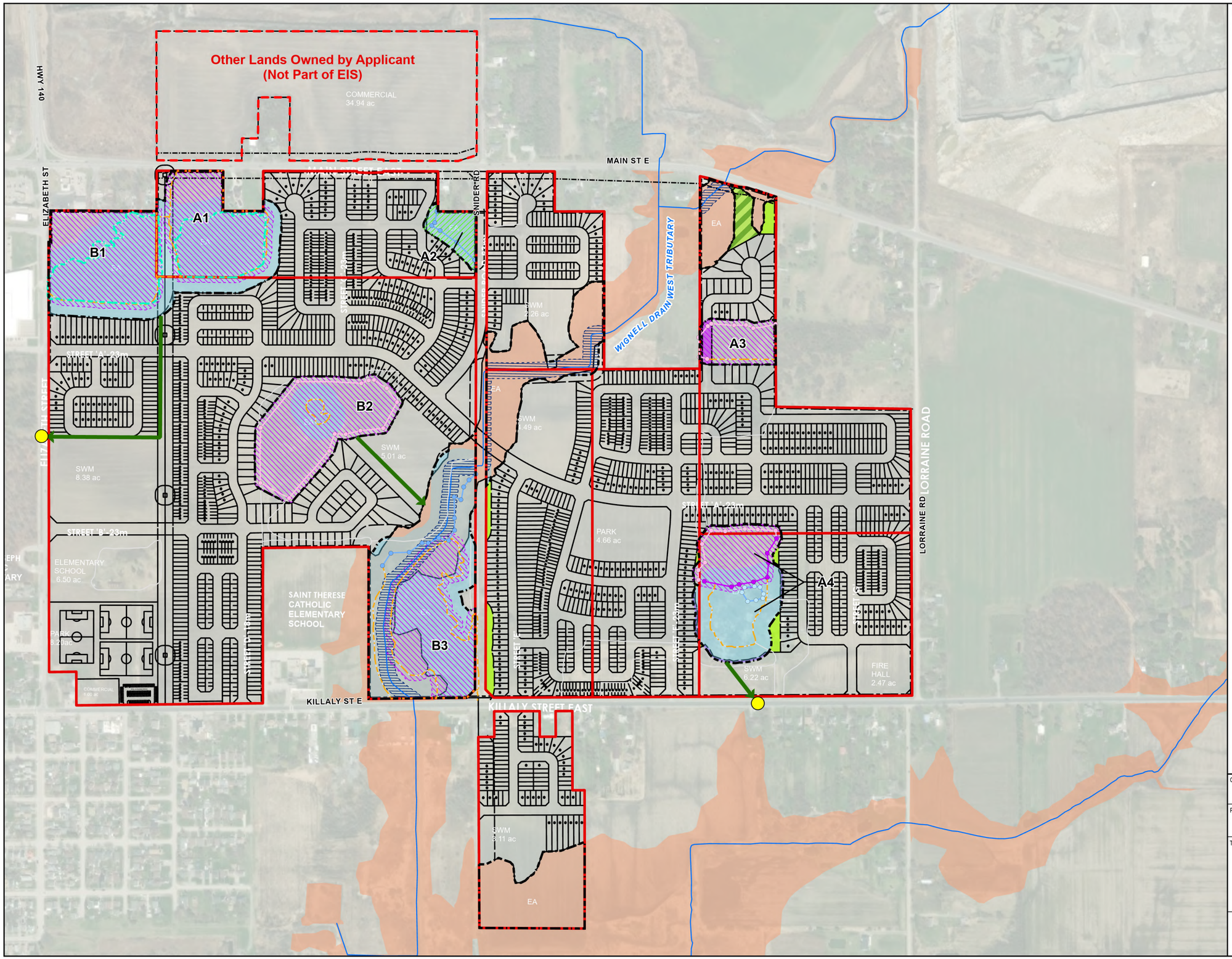
# Natural Heritage Constraints and Development Limit

SLR

REF. NO. 2007705-5-5

**Figure 5**

Document Path: G:_Projects\233\233_065441_PortColbKillaly\1_Workspace\1_Maps\20251212_Ecology_SLR_Figures\233_065441_EcologyFigures\233_065441_EIS_Adddendum.aprx




LEGEND

Drainage Features:
- Municipal Drain-Important/Marginal Fish Habitat[1]
- Municipal Drain-Important/Marginal Fish Habitat w/ 15 m Buffer

Woodland Features:
- Surveyed - Woodland (Nov 18th, 2021)
- Surveyed Woodland (Sept 14th, 2022)
- Significant Woodland w/ 10 m Buffer

Wetland Features:
- Surveyed Wetland (Sept 14th, 2022)
- Evaluated Non-PSW Wetland [1]
- Other Wetland or Woodland Boundary [2]
- Wetlands w/Variable Buffer (30m except SWH)

Wildlife Feature:
- Significant Wildlife Habitat w/ 15m Buffer

Proposed Linkage
- Future Eco-Passage
- Proposed Ecological Linkage

Other Features:
- Floodplain[3]
- ELC Community
- Development Plan (January 29, 2026)
- Subject Properties of Elite Developments (142.2 ha)
- Ecological Gain or Compensation Area
- Woodland Compensation Area
- Encroachment into Natural Area

1. Land Information Ontario (LIO)
2. All surveyed, LIO, and additional wetland and woodland features as shown on this map have been agreed upon between NPCA, Niagara Region, and SLR (Formerly Palmer) (Sept 2022).
3. Niagara Peninsula Conservation Authority (NPCA) as updated by Odan de Tech.

**Notes:**
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PROJECT
EIS Addendum for Elite Developments
East of Port Colborne

TITLE
# Proposed Development (Revised January 29, 2026)

SLR

REF. NO. 2007705-6-3

**Figure 6**

Document Path: G:_Projects\233\233_065441_PortColbKillaly\1_Workspace\1_Maps\20251212_Ecology_SLR_Figures\233_065441_EcologyFigures\233_065441_EIS_Adddendum.aprx

Other Lands Owned by Applicant
(Not Part of EIS)

COMMERCIAL
34.94 ac

HWY 140

ELIZABETH ST

MAIN ST E

SNIDER RD

WIGNELL DRAIN WEST TRIBUTARY

LORRAINE ROAD

A1

A2

A3

A4

B1

B2

B3

EA

STREET 'A' 23m

STREET 'B' 23m

STREET 'C' 23m

STREET 'D' 19m

STREET 'E'

STREET 'F'

STREET 'G'

SWM
8.38 ac

SWM
5.01 ac

SWM
2.26 ac

SWM
4.49 ac

SWM
6.22 ac

SWM
3.11 ac

PARK
4.66 ac

PARK
8.20ac

ELEMENTARY
SCHOOL
6.50 ac

SAINT THERESE
CATHOLIC
ELEMENTARY
SCHOOL

COMMERCIAL
3.60 ac

FIRE
HALL
2.47 ac

KILLALY ST E

KILLALY STREET EAST

LEGEND

Drainage Features:

- Municipal Drain-Important/Marginal Fish Habitat[1]

Enhancement Planting and Seeding Areas:

- Woodland Compensation Area
- Ecological Gain or Compensation Area
- Buffer Enhancement Area
- Floodplain Enhancement Area

Other Features:

- Encroachment into Natural Area
- Existing Semi-Natural Area
- Floodplain[2]
- ELC Community
- Development Plan (January 29, 2026)
- Properties of Elite Development (142.2 ha)

1. Land Information Ontario (LIO)
2. Niagara Peninsula Conservation Authorty (NPCA) as updated by Odan de Tech.

**Notes:**
- A1, B1, etc = Natural Areas

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METRE SCALE

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PROJECT EIS Addendum for Elite Developments East of Port Colborne

TITLE

# Proposed Enhancement and Compensation Areas

SLR

REF. NO. 2007705-7-1

**Figure 7**

Document Path: G:_Projects\233\233_065441_PortColbKillaly\1_Workspace\1_Maps\20251212_Ecology_SLR_Figures\233_065441_EcologyFigures\233_065441_EIS_Adddendum.aprx