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Project No. CA0053084.9335

Jennifer Ailey, Land Development Manager

R.W Tomlinson Ltd.

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ENVIRONMENTAL IMPACT ASSESSMENT ADDENDUM, VL – ELMWOOD DRIVE, GANANOQUE, ONTARIO

Dear Jennifer Ailey,

WSP Canada Inc. (WSP) was retained by 1000989284 Ontario Inc. (The Client) to conduct an Environmental Impact Assessment (EIA; the Study) for the proposed residential development at Elmwood Drive, Town of Gananoque, Ontario. This EIA (WSP 2025) was submitted to the City of Gananoque (the City) as part of the original Draft Plan of Subdivision application on September 27, 2025. To satisfy comments from the City as well as the Cataraqui Region Conservation Authority (CRCA) on the Draft Plan of Subdivision (the Plan), some changes have been made to the Plan (Attachment 1). In addition, there have been some changes to legislation that affects the EIA. This letter is an addendum to the original EIA to address these changes to the draft plan and legislation since the original submission.

Changes to Relevant Legislation

The *Species Conservation Act* (SCA; Ontario 2025) came into effect on 30 March 2026 and repeals the *Endangered Species Act* (ESA). The purpose of the SCA is to identify SAR and to provide for the protection and conservation of SAR while taking into account social and economic considerations, including the need for sustainable growth in Ontario. The list of SAR considered under the SCA consists of endangered and threatened species contained within the Protected Species in Ontario List (PSO List; O.Reg. 60/26). The PSO List does not include endangered or threatened migratory birds and aquatic species (per the definition of the Fisheries Act) that are also protected under the SARA, and the SCO List is not required to include all endangered and threatened species identified by the Committee on the Status of Species at Risk in Ontario (COSSARO).

Under the Act, habitat for species is defined as

- In respect to animals, a dwelling-place (nests, dens, etc.) that is occupied or habitually occupied by one or more members of a species for breeding, rearing, staging, wintering, or hibernating, and the immediate surrounding area necessary for breeding, rearing, staging, or hibernation.
- In respect to vascular plant species, the critical root zone surrounding a member of the species.

- In respect of all other species, an area on which any member of a species directly depends in order to carry on its life processes.

Using this definition, habitat for animals does not include areas used exclusively for foraging or travelling between dwelling places.

Per Section 16 of the Act, any activity that may result or is likely to result in the killing, harming, capturing or taking of a SAR, or possessing, transporting, collecting, buying, selling, leasing, trading or offering to buy, sell or lease a SAR, must obtain a permit under the Act in accordance with O.Reg. 74/26. Any activity that may damage or destroy the habitat of a SAR must register in accordance with O.Reg. 75/26. Certain activities are specifically exempted from requiring a permit or registration under O.Reg. 61/26.

Registerable activities must be registered through the Species Conservation Registry and must not commence until confirmation of registration is received. As part of registration, a Conservation Plan must be prepared and on-going monitoring and record-keeping are required. Permit activities will still be subject to case-specific measures to be determined through consultation with the MECP.

Changes to the Draft Plan of Subdivision, Stormwater Management, and Enhancements

Changes to the proposed development include some changes in lot layout, minor changes in street layout, a reduction in single detached units (from 77 to 66), and the addition of 23 townhouse units and 14 cluster townhouse units. Additional changes include a reduction in size of the eastern park block (block 74), the addition of another park block (block 73), and an increase in the size of the open space block (Elmwood Wetland, block 76). Refer to the Plan (Attachment 1) or the updated Draft Plan of Subdivision submission package, for more details on these changes. In addition, there are some minor changes to the stormwater management plan and the planned watercourse and wetland enhancements, but the overall function and improvements remain the same (FOREFRONT 2026). Refer to the Stormwater Management Report (FOREFRONT 2026) for more details on these changes.

Updated Assessment of Significance and Impact Assessment

Species at Risk

The implementation of the SCA does not change the impact assessment, mitigation, or recommendations relating to SAR discussed in the original EIA. While some changes to the designation of species apply (e.g., removal of provincial protection of most birds), the overall list of species discussed in the EIA has primarily remained the same with some reductions but no additions. In addition, mitigation and recommendations for species such as SAR bats remains the same, and the conclusion that no impacts to SAR will occur if mitigation is followed remains accurate in light of the new SCA. No registration under the SCA is required for the activities associated with the proposed development.

Coastal Wetlands

The most notable change related to Coastal Wetlands is a reduction in the encroachment of lots into the Elmwood Wetland (block 76), and a larger portion will remain as wetland within the open space block. With the proposed changes, and the mitigations presented in the original EIA, negative impacts to the Elmwood Wetland and their ecological function are not anticipated.

Fish Habitat

Given the reduction in the encroachment to, and removal of, portions of the Elmwood Wetland, there will be some minor reductions in loss of indirect fish habitat. However, the updated plan will still require submission of a Request for Review (RFR) to Fisheries and Oceans Canada (DFO). Recommendations for mitigating indirect impacts on fish habitat on the Site and adjacent to the Site remains unchanged from the original EIA. With the proposed changes, and implementation of the mitigations identified in the original EIA, impacts to fish habitat on or off the Site will not occur. This will need to be confirmed with DFO through the RFR.

Other Significant Features

Impacts, conclusions, and recommendations relating to all other Significant Natural Features in the Study Area have not changed since the original EIA.

Conclusions

Since the original submission, the ESA has been repealed and replaced by the SCA. The proposed changes to the Draft Plan of Subdivision will reduce encroachment into the Coastal Wetlands and associated Fish Habitat on the Site (i.e., Elmwood Wetland). In addition, there are some minor changes to the stormwater management plan and watercourse and wetland enhancements, but the overall function and improvements remain the same. None of these changes affect the analysis of impacts or original recommendations to any Significant Natural Features as presented in the original EIA. No additional mitigation or recommendations are required.

Limitations

This report was prepared for the exclusive use of 1000989284 Ontario Inc., and RW Tomlinson Ltd. The report, which specifically includes all tables, figures and attachments, is based on data and information collected by WSP Canada Inc. and is based solely on the conditions of the properties at the time of the work, supplemented by historical information and data obtained by WSP Canada Inc. as described in this report. WSP is not responsible for the accuracy of data collected by other consultants and provided to WSP Canada Inc. by the client.

Electronic media is susceptible to unauthorized modification, deterioration and incompatibility and therefore authenticity of any electronic media versions of WSP's report should be verified.

WSP Canada Inc. has relied in good faith on all information provided and does not accept responsibility for any deficiency, misstatements, or inaccuracies contained in the report as a result of omissions, misinterpretation, or fraudulent acts of the persons contacted or errors or omissions in the reviewed documentation.

The services performed, as described in this report, were conducted in a manner consistent with that level of care and skill normally exercised by other members of the engineering and science professions currently practicing under similar conditions, subject to the time limits and financial and physical constraints applicable to the services.

Any use which a third party makes of this report, or any reliance on, or decisions to be made based on it, are the responsibilities of such third parties. WSP Canada Inc. accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

The findings and conclusions of this report are valid only as of the date of this report. If new information is discovered in future work, including excavations, borings, or other studies, WSP Canada Inc. should be requested to re-evaluate the conclusions of this report, and to provide amendments as required.

Closing

We trust this report meets your current needs. If you have any further questions regarding this report, please contact the undersigned.

Sincerely,

WSP Canada Inc.



Fergus Nicoll
Senior Ecologist



Gwendolyn Weeks
Lead Ecologist

FN/GW/ld

CC: Emily Elliot MHBC

Attachments: Attachment 1 – Draft Plan of Subdivision

[https://wsponlinecan.sharepoint.com/sites/ca-ca0053084.9335/shared documents/06. deliverables/eia update/elmwood eia addendum draft vs1 01_june_2026.docx](https://wsponlinecan.sharepoint.com/sites/ca-ca0053084.9335/shared%20documents/06.%20deliverables/eia%20update/elmwood%20eia%20addendum%20draft%20vs1%2001_june_2026.docx)

References

FOREFRONT Engineering Inc. (FOREFRONT). 2026. VL – Elmwood Drive Stormwater Management Report. 21pp.

Ontario (Government of Ontario). 2025. *Species Conservation Act*. S.O. 2025, C.4. S.10. Available: <https://www.ontario.ca/laws/statute/25s04b>

WSP Canada Inc. (WSP). 2025. Environmental Impact Assessment. 205 Elmwood Drive, Gananoque, Ontario. 44pp

ATTACHMENT 1

Draft Plan of Subdivision

