

## **Attachment B**

July 25, 2025

Jeremia Rudan, President  
Placemaker Co.  
3659 Stanely Ave, Unit 4U  
Niagara Falls, ON L2E 0A6

**Re: Town of Fort Erie Official Plan Updates  
Dominion and Kraft Road**

GEI Consultants Canada Ltd. (GEI) Has been retained by Placemaker Co. to provide ecological support associated with the landholdings northwest of the intersection of Dominion and Kraft Road in the Town of Fort Erie, ON. The limits of the landholdings are shown in the attached Figure and are hereafter referred to as the Subject Lands. The Subject Lands have been subject to extensive study by 8Trees Inc., and as such, a great deal of information is presently known about the ecological functions of these lands within the context of the Town of Fort Erie.

Given GEI's understanding of the Subject Lands based on the work undertaken to date by 8Trees, a review of the Natural Heritage Schedules prepared by the Town of Fort Erie was completed to assess accuracy in representation of the Subject Lands. Based on this review, GEI offers the following commentary with respect to the Natural Heritage Schedules.

## **Existing Conditions**

The Subject Lands ecological conditions at this time reflect historic anthropogenic use of the area. In the early part of the 20<sup>th</sup> century, the majority of Subject Lands were in active agricultural production, with the watercourse and valleylands visible as a treed area on the landscape. Since that time, changes to the landscape, including the construction of the drainage channel along the western limits of the Subject Lands and the abandonment of agricultural production have influenced the ecological succession of the Subject Lands.



**Photo: 1934 image of the Subject Lands northwest of the intersection of Dominion and Kraft Road**

The construction of the drainage channel has altered local moisture regimes within the valleyland system, diverting water that would have otherwise flowed through the area. These areas have retained sufficient moisture to remain wetlands, but the extent of annual flooding is greatly reduced.

Tablelands on the Subject Lands have also been subject to succession to cultural thicket communities, dominated by non-native Buckthorn. Field investigations have determined that these cultural thicket communities are offering limited ecological value given the high incidence of invasive species.

## **Review of Natural Heritage Schedules**

Schedule F – Natural Environment System of the Town’s draft Official Plan shows the Subject Lands as being situated entirely within the limits of the Natural Environment System.

Schedule G – Natural Environment System Features maps the Subject Lands as being entirely comprised of wetland communities, both provincially significant wetlands and non-provincially significant wetlands, with components of significant valleylands, valleylands and stream corridors, significant woodlands, and fish habitat.

Based on the efforts undertaken on the Subject Lands to date, GEI believes that the recommended mapping does not adequately characterize the extent of the Natural Environment System on the Subject Lands, mapping areas that are heavily degraded by invasive species such as Common Buckthorn (*Rhamnus cathartica*) as components of this system. Inclusion of areas such as these will have the effect

of degrading the overall system, allowing for the continued spread and perseverance of invasive and exotic species throughout the rest of the Natural Environment System.

Specifically, GEI would offer the following commentary as it relates to components of the Natural Environment System on the Subject Lands.

### ***Provincially Significant Wetlands***

Schedule G currently shows components of a provincially significant wetland on the Subject Lands. It is important to note that this base mapping layer is out of date and studies undertaken by the 8Trees and provided to the municipality in accordance with the requirements of the Ontario Wetland Evaluation System have concluded that there are no provincially significant wetlands on the Subject Lands. This is accurately mapped within the Land Information Ontario database at [https://www.lioapplications.lrc.gov.on.ca/Natural\\_Heritage/index.html?viewer=Natural\\_Heritage.Natural\\_Heritage&locale=en-CA](https://www.lioapplications.lrc.gov.on.ca/Natural_Heritage/index.html?viewer=Natural_Heritage.Natural_Heritage&locale=en-CA).

### ***Non-provincially Significant Wetlands***

Outside of the provincially significant wetlands, Schedule G maps the entirety of the Subject Lands as being non-provincially significant wetlands.

GEI is not aware of the source of this mapping as neither Land Information Ontario, nor the Niagara Peninsula Conservation Authority maps the entirety of the Subject Lands as being comprised of a wetland community.

Based on the work undertaken by 8Trees, the extent of wetland is significantly less than that mapped on Schedule G and aligns with the limits of the wetlands as mapped by Land Information Ontario based on the mapping provided by 8Trees.

### ***Valleylands/Fish Habitat***

It is acknowledged that a valleyland and fish habitat associated with the watercourse on the Subject Lands is present. In general, the mapping shown on Schedule G generally accounts for the majority of the identified features, however there is an extension of the valleyland/fish habitat in the northeastern limits of the Subject Lands that does not align with observed conditions.

### ***Woodlands***

The only woodlands mapped on the Subject Lands on Schedule G are shown in the southwestern corner near Dominion Road. This generally aligns with the observations from the Subject Lands, although the limits of those features vary.

## **Recommendations**

When establishing limits of Natural Environment System, the importance of considering data collected from ground-truthed observations is paramount to avoid identification of natural heritage features

where none exist, thereby posing future potential constraints to development. Further, the current schedules indicated provincially significant wetlands exist on the Subject Lands, where no such features are present.

Based on the detailed work undertaken on the Subject Lands by 8 Trees, GEI has provided recommended limits for a Natural Environment System that considers valleylands, fish habitat, woodlands, and wetlands, and includes appropriate buffers to protect those features and create a contiguous, functional system on the landscape to maintain hydrologic conditions and permit the movement of wildlife (see attached Figure).

Lands that are not included within the Natural Environment System are those with a history of anthropogenic use to support agriculture, and whose ecological function is impaired by the high incidence of invasive species.

The results of the site investigations completed on the Subject Lands will be provided in support of any future development applications at this site, within the identified Kraft Designated Growth Area.

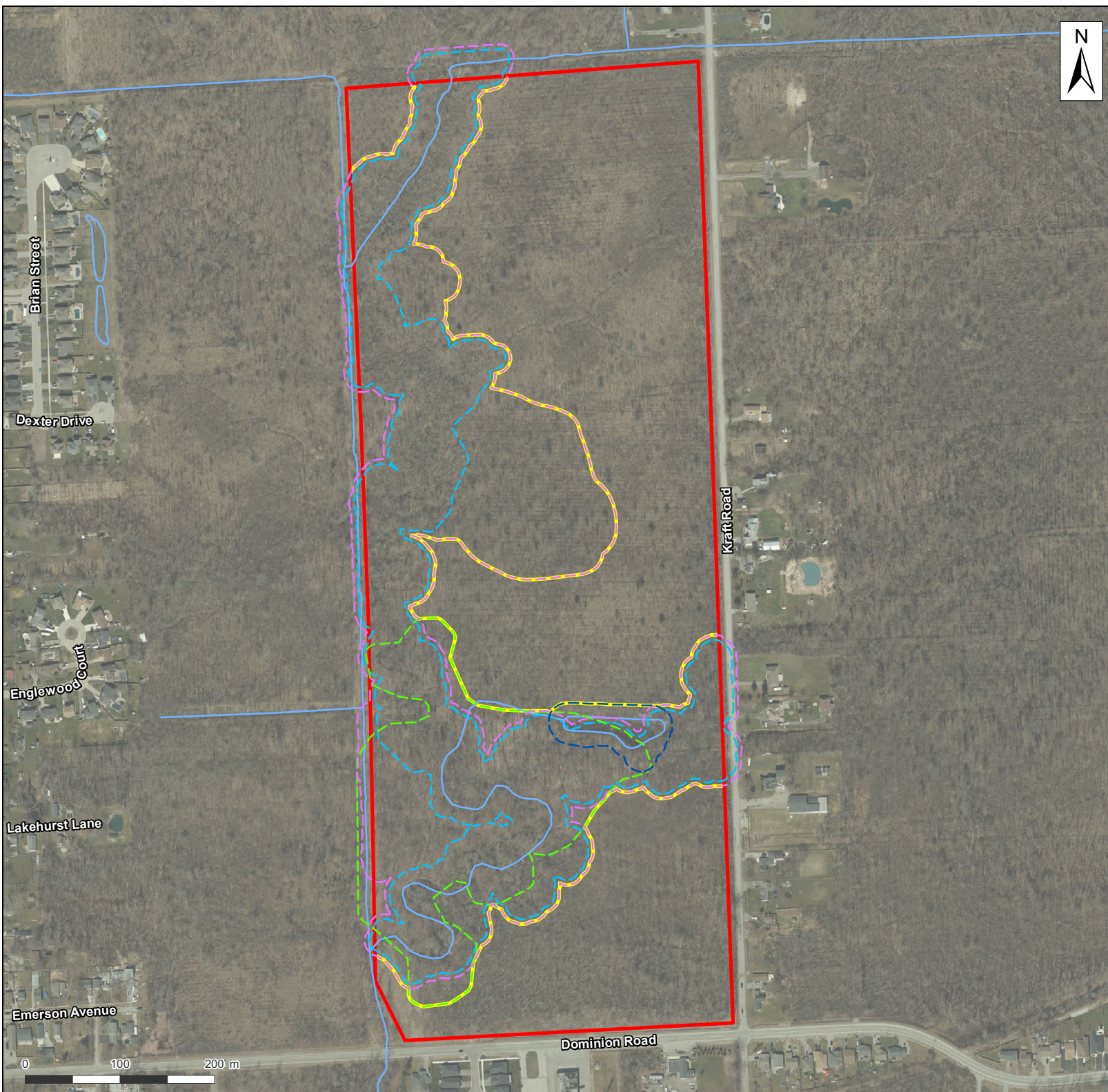
Should you wish to discuss any of the information contained within this letter, please contact the undersigned.

Sincerely,

**GEI CONSULTANTS CANADA LTD.**

A handwritten signature in black ink, appearing to read 'Sean Male', with a stylized flourish extending to the right.

Sean Male, M.Sc.  
Senior Ecologist



- █ Subject Lands
- █ Recommended Limits of Natural Heritage System
- █ Watercourse
- █ Waterbody
- █ Creek Valley + 10 metres
- █ Old Growth Forest + 10 metres
- █ Pond + 15 metres
- █ Wetland + 15 metres

- Reference(s):**
1. Coordinate System: NAD 1983 CSRS UTM Zone 17N.
  2. Base features produced under license with the Ontario Ministry of Natural Resources and Forestry © King's Printer for Ontario, 2025.
  3. Orthoimagery © First Base Solutions, 2025. Imagery taken in 2023.

**Figure  
Recommended Limits of  
Natural Heritage System**

**Project Name:**  
Dominion and Kraft Road, Fort Erie  
Environmental Impact Study

**Client Name:**  
Placemaker Co.  
(Ontario, Canada)



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