

Appendix E: Public Comments on the Niska Land Holdings 2023 Draft Management Plan

Overview of Public Comments

A total of 17 individuals or groups submitted 25 responses providing comment on the Niska Landholdings 2023 Draft Management Plan.

Responses re: Draft Management Plan Recommendations*

- Recommendation #1: Engage with the City of Guelph and other third parties to explore opportunities to enter into a maintenance agreement for parcels of land that can provide recreational or conservation opportunities.
 - 5 respondents agreed with this recommendation
 - 1 respondent did not agree with this recommendation
- Recommendation #2: Continue to advocate and promote partnership opportunities to manage and monitor the biodiversity and ecological systems within the land holdings.
 - 5 respondents agreed with this recommendation
 - 0 respondents did not agree with this recommendation
- Recommendation #3: Dispose of lands south of Niska Rd. that are associated with the agricultural lease and identify other lands that could be suitable for disposition.
 - 5 respondents agreed with this recommendation
 - 11 respondents did not agree with this recommendation

Other Common Responses*

- 10 respondents mentioned valuing the landholdings for recreation &\or nature appreciation
- 9 respondents mentioned valuing the landholdings for its natural\ecological values
- 2 group respondents expressed interest in working with the GRCA to help manage aspects of the Niska Land Holdings

* Note – opinions from individual respondents that submitted multiple sets of comments were only recorded once in the above summary

Copies of Public Comments – Niska Landholdings 2023 Draft Management Plan

Comment #1

May 11, 2023

The Guelph hiking club just put in a bridge that makes the conservation lands accessible. Since that bridge went in, I am walking in the conservation lands everyday. It's an amazing spot and deserves to be protected. I walk along the river, all the streams and in the forested areas. They're all amazing and have been a huge help in my recovery from cancer that I have been battling for a few years. Please therefore do not sell the forested areas for development. I get that the fields may make good housing but turn the rest into a park if the conservation authority is not able/wanting to keep it. Green mostly natural areas that are accessible are so hard to come by and this one is a gem and should be protected for future generations to use and benefit from.

Comment #2

May 12, 2023

I generally support the recommendations of the management plan. I agree that the abandoned infrastructure such as fences and weirs should be addressed. It is not reasonable or appropriate to saddle the City or third party (who is very unlikely to have the financial capacity to do this) with this responsibility, especially in absence of a cost estimate. Part of the funds from disposition of the agricultural lands should be used for decommissioning. GRCA should be good stewards of the lands and clean up their mess, and the mess of their tenants, rather than starting the inevitable, decades-long game of hot potato.

Comment #3

May 12, 2023

Please please please don't sell off any of the Niska/Kortright lands. Unfortunately Ontario is stuck with the Doug Ford way for a while. Please don't let his government's short-sighted thinking lead to losing land. From what I understand, housing is not the crisis governments claim it is. I don't live near the old Kortright property but knowing it is there and undeveloped means something to me as I believe it does to many others especially the flora and fauna that live there.

Comment #4**May 15, 2023**

(Respondent submitted multiple comments – 4,6,8,10,11)

As mentioned our 6 acres connects onto Niska Land Holdings to the east.

1) We have been maintaining the path which runs parallel to Woodlawn Glen for over 15+ years, allowing a path for walking, for access to city of Guelph staff to access the storm overflow pond, we have been cleaning the stream/river that runs through this area (especially after the new subdivision construction to the south of us dumped an enormous amount of silt), we have been disassembling the drug huts, picking garbage, cleaning up by hand invasive buckthorn.

2) I have been planting native trees/tree seedlings every spring 100-200+, which I purchased from GRCA forestry, to improve the wetlands and the animal corridor, we cut the grass to maintain a safe path for walking to reduce tick encroachment. We have been excellent stewards of this land and we would like to continue to improve this area.

3) The stream is filled with trout, there are salamanders, and this area is home to many turtles. I have encouraged a repopulation of birds to this area by my 18 years of tree planting by providing a greenspace/wetlands for them. My trees help cool our area and assist in our microclimate.

4) The city of Guelph has a well here which pumps our water from this area, a healthy watershed is vital for purification of water and conservation of water.

5) We have vital wetlands which are essential to keep.

6) I would like to understand the potential for sale of the path that the community uses that backs on to Woodlawn Glen which all neighbours have access to.

7) I would like to consider this strip of land area also to be protected:

<https://www.quietparks.org/quiet-conservation-area>

I would like to nominate this area to protect it: <https://www.quietparks.org/nominate-a-quiet-place>

I hope you can help to carry on my stewardship and conservation efforts of this area.

Thank you for your time today.

Comment #5**May 15, 2023**

(Respondent submitted multiple comments – 5,7,18,19)

I have many concerns regarding Niska Land Holdings Management Plan and I do not support the sell of the Niska Lands. These lands are homes to many birds, animals and fish. Developing this area would have a devastating effect ecologically. This would have a devastating effect on the community as it provides a source of nature for people to enjoy and embrace. Please provide a detailed description and map outlining the details of the property that GRCA purposes to develop.

Comment #6**May 15, 2023**

(Respondent submitted multiple comments – 4,6,8,10,11)

Our 6 acres connects onto Niska Land Holdings to the east. No one consulted us on our opinion.

1) We have been maintaining the path which runs parallel to Woodlawn Glen for over 15+ years, allowing a path for walking, for access to city of Guelph staff to access the storm overflow pond, we have been cleaning the stream/river that runs through this area (especially after the new subdivision construction to the south of us dumped an enormous amount of silt), we have been disassembling the drug huts, picking garbage, cleaning up by hand invasive buckthorn.

2) I have been planting native trees/tree seedlings every spring 100-200+, which I purchased from GRCA forestry, to improve the wetlands and the animal corridor, we cut the grass to maintain a safe path for walking to reduce tick encroachment. We have been excellent stewards of this land and we would like to continue to improve this area.

3) The stream that runs through this land is filled with trout, there are salamanders, and this area is home to many turtles. I have encouraged a repopulation of birds to this area by my 18 years of tree planting on Niska by providing a greenspace/wetlands for them. My trees help cool our area and assist in our microclimate.

4) The city of Guelph has a well here which pumps our water from this area, a healthy watershed is vital for purification of water and conservation of water.

5) We have vital wetlands which are essential to keep for water management/flooding.

6) I would like to understand the potential for sale of the path that the community uses that backs on to Woodlawn Glen which all neighbours have access to.

7) I would like to consider this strip of land area also to be protected:

<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.quietparks.org%2Fquiet-conservation-area&data=05%7C01%7Cniska%40grandriver.ca%7C14a1eba8123946717f8b08db555b9a62%7C1315710bb3704b46afe05f81d18c449a%7C0%7C0%7C638197624184575681%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=feEUAgpp2myThS%2BdPyOnsG2tmvhEN09R6rj%2Bbe2xgJM%3D&reserved=0>

I hope you can help to carry on my stewardship and conservation efforts of this area.

I WOULD LIKE TO PURCHASE A PORTION OF THIS LAND TO CARRY ON OUR CONSERVATION.

Comment #7**May 15, 2023**

(Respondent submitted multiple comments – 5,7,18,19)

Would like to speak to someone regarding the land holding draft management plan. Called twice but it only allows a voicemail. Can't speak to someone and there is no contact. the paper has publicized this that the GRCA hasn't provided any contact person.

Comment #8**May 15, 2023**

(Respondent submitted multiple comments – 4,6,8,10,11)

Good morning,

Our 6 acres connects onto Niska Land Holdings to the east.

1) We have been maintaining the path which runs parallel to Woodlawn Glen for over 15+ years, allowing a path for walking, for access to city of Guelph staff to access the storm overflow pond, we have been cleaning the stream/river that runs through this area (especially after the new subdivision construction to the south of us dumped an enormous amount of silt), we have been disassembling the drug huts, picking garbage, cleaning up by hand invasive buckthorn.

2) I have been planting native trees/tree seedlings every spring 100-200+, which I purchased from GRCA forestry, to improve the wetlands and the animal corridor, we cut the grass to maintain a safe path for walking to reduce tick encroachment. We have been excellent stewards of this land and we would like to continue to improve this area.

3) The stream that runs through this land is filled with trout, there are salamanders, and this area is home to many turtles. I have encouraged a repopulation of birds to this area by my 18 years of tree planting on Niska by providing a greenspace/wetlands for them. My trees help cool our area and assist in our microclimate.

4) The city of Guelph has a well here which pumps our water from this area, a healthy watershed is vital for purification of water and conservation of water.

5) We have vital wetlands which are essential to keep for water management/flooding.

6) I would like to understand the potential for sale of the path that the community uses that backs on to Woodlawn Glen which all neighbours have access to.

7) I would like to consider this strip of land area also to be protected: <https://www.quietparks.org/quiet-conservation-area>

I hope you can help to carry on my stewardship and conservation efforts in this area.

I WOULD LIKE TO PURCHASE A PORTION OF THIS LAND TO CARRY ON OUR CONSERVATION.

Comment #9**May 18, 2023**

Please make walking and bike trails in this area. Please don't develop the land and build houses. The roads won't be able to handle the increase in cars and school is already over populated.

Comment #10

May 18, 2023

(Respondent submitted multiple comments – 4,6,8,10,11)

Good Morning,

When we purchased our 6 acre property 18 years ago, we moved from the GTA for mental calm. I had an adoration of the GRCA and the philosophy of stewardship of land, water, and nature.

Please help our community know that the GRCA stands for these ideals.

Niska Land Holdings is not in surplus. By selling these lands for further development we risk having more problems.

1) Niska Land is a vital important watershed for the city of Guelph water well that feeds this community. Clean water. The wetlands are vital as a carbon sink, and water filter.

2) This area is a vital Ecosystem, and corridor for the existing habit for animals, birds, reptiles, we need to preserve the quiet and not increase the noise. There are trout and fish in the Niska creek, this flows through my property and this area. We have leaders in the community who advocate for our fish and turtles here. We have a community who cares here.

3) Let us increase nature and not lose nature. When noise pollution increases nature leaves. This affects the community's mental health, and children's mental health.

4) The Niska climate microsystem needs to be preserved in this area, the trees cool our community. Eliminating and adding concrete and asphalt increases the heat.

5) The Niska community has been having issues with increasing noise pollution, the traffic dangers is an ongoing issue with the expansion of Baileys bridge, the city of Guelph and the police are unable to address these issues as it is. If Guelph cannot handle the already problems, how can they increase development in this area? We need a better strategy, CONSERVATION!

-Increase Noise pollution=increase aggression, increase mental health issues, disconnection

-unsafe for children to cross the road due to traffic

-UNSAFE elderly and disabled cross the road due to traffic

6) The GRCA has a responsibility to revive the waterfowl park, and the Niska Land Holdings so it can be once again a point of pride for Guelph. For tourism, for education, for the community.

How can we revive this and have a legacy of pride:

1) Create a Niska Education center

2) Ask the community:

Do you want a place to safely walk your children/grandchildren, to increase/maintain the value of your property, to have a place for community pride and maintain safety?

or

a place with more traffic, concrete, noise, noise pollution, less/no nature, because nature will leave

3) Community fundraising and involvement to revive this area into a proper park

- 4) Collaboration with the University of Guelph as an education, research facility
- 5) Collaboration with the city of Guelph to create a park

We can apply for a Quiet park International award and designation.

I have already nominated Niska Land Holdings area, and we qualify

"All that would be needed is for a specific statement in the Management Plan that lists natural quiet as a valuable resource that is to be protected and managed"

Gordon Hempton, Co-Founder
Quiet Parks International
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<https://www.quietparks.org/quiet-parks-international-award>

*I am interested in taking over a piece of the Niska Land Holdings that I have maintained for 15+ years/purchasing, the lands that i have cared for, planting GRCA trees, cleaning the land, cutting grass and maintaining walking trails for the city of Guelph to access the storm ponds and tick prevention.

We can do better, we can create a legacy of pride for the next generation.

Comment #11

May 18, 2023

(Respondent submitted multiple comments – 4,6,8,10,11)

Good Morning,

When we purchased our 6 acre property 18 years ago, we moved from the GTA for mental calm. I had an adoration of the GRCA and the philosophy of stewardship of land, water, and nature. Please help our community know that the GRCA stands for these ideals.

Niska Land Holdings is not in surplus. By selling these lands for further development we risk having more problems.

1) Niska Land is a vital important watershed for the city of Guelph water well that feeds this community. Clean water. The wetlands are vital as a carbon sink, and water filter.

2) This area is a vital Ecosystem, and corridor for the existing habit for animals, birds, reptiles, we need to preserve the quiet and not increase the noise. There are trout and fish in the Niska creek, this flows through my property and this area. We have leaders in the community who advocate for our fish and turtles here. We have a community who cares here.

3) Let us increase nature and not lose nature. When noise pollution increases nature leaves. This affects the community's mental health, and children's mental health.

4) The Niska climate microsystem needs to be preserved in this area, the trees cool our community. Eliminating and adding concrete and asphalt increases the heat.

5) The Niska community has been having issues with increasing noise pollution, the traffic dangers is an ongoing issue with the expansion of Baileys bridge, the city of Guelph and the police are unable to address these issues as it is. If Guelph cannot handle the already problems, how can they increase development in this area? We need a better strategy, CONSERVATION!-Increase Noise

pollution=increase aggression, increase mental health issues, disconnection-unsafe for children to cross the road due to traffic-UNSAFE elderly and disabled cross the road due to traffic

6) The GRCA has a responsibility to revive the waterfowl park, and the Niska Land Holdings so it can be once again a point of pride for Guelph. For tourism, for education, for the community. How can we revive this and have a legacy of pride:1) Create a Niska Education center2) Ask the community: Do you want a place to safely walk your children/grandchildren, to increase/maintain the value of your property, to have a place for community pride and maintain safety? ora place with more traffic, concrete, noise, noise pollution, less/no nature, because nature will leave
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<https://can01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.quietparks.org%2Fquiet-parks-international-award&data=05%7C01%7Cniska%40grandriver.ca%7Cce6cdebe121a4b29f08008db57a42749%7C1315710bb3704b46afe05f81d18c449a%7C0%7C0%7C638200134790757206%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sd ata=ChixxhUatC9Xluzk6sc%2F15zwlcGrcDZl7EWquZCPX5c%3D&reserved=0>

*I am interested in taking over a piece of the Niska Land Holdings that I have maintained for 15+ years/purchasing, the lands that i have cared for, planting GRCA trees, cleaning the land, cutting grass and maintaining walking trails for the city of guelph to access the storm ponds and tick prevention. We can do better, we can create a legacy of pride for the next generation.

Comment #12

May 18, 2023

The Niska Land Holdings should be preserved in a natural but managed state for future generations. This unique area of water, farmland and forest should not be developed or sold to developers. Water and forest resources next to cities are excellent buffers in a warming climate and also habitats for wildlife as well as recreational use.

Comment #13

May 29, 2023

As residents of the Niska neighbourhood our family has been impressed with the community stewardship of the land holdings. We spend a significant amount of time walking in the woods as a

family. We are concerned that opening up the lands south of Niska to development will not only bring more people to the area but will impact the eco-system. We have already seen a difference with the installation of the bridge at College/Stone that has brought more people to the woods. There is more garbage, less care taken to stay on established paths.

We are also concerned about the loss of usable farm land in the region. At what point will we realized we have put houses over too much of it?

We strongly encourage the GRCA to hold on to this land. We'd happily contribute to a fund to maintain it; I'm confident many of our neighbours would.

Thanks for listening

Comment #14

June 12, 2023

Request for Comment – GRCA Niska Land Holdings 2023 Draft Management Plan (June 2023)

The Niska Lands are a component of the ecologically significant Hanlon Creek PSW that has been studied extensively over the past half century. The management plan needs to acknowledge the significance of its setting and structure appropriate future natural/human community land use issues accordingly. As outlined below, the land use base has been extensively studied and findings of the various reports/studies over the decades have found their way into the official planning documents of the City of Guelph – the 2023 Official Plan (as amended by OPA 80) and the Comprehensive Zoning By-law (2023-20790).

In terms of basic land use, the bulk of the Niska Lands are comprised of NHS lands – protected natural lands for biodiversity protection, and to permit passive recreational pursuits, i.e., trails, scientific study. A portion of the lands north of Niska are designated for Open Space use (recreational facilities and multi-functional natural buffer enhancement). The lands in the southeast portion of the block, south of Niska are designated for residential development. The Plan outlines development policies applicable to these various land use designations. The Zoning By-law zones the subject Niska Lands in compliance with the Guelph OP policies.

In terms of trail development through the area, guidance is given by way of OP Schedule 6 – Open Space and Trail Network from the Guelph OP. New trail development fits with the goals and aspirations of the City's Guelph Trail Master Plan – May 2021. <https://guelph.ca/wp-content/uploads/Guelph-Trail-Master-Plan.pdf> New trail development will support the great effort the City and the Guelph Hiking Trail Club put into the development of the new Crane Park Community Bridge (opened May 2023 to the north of the Niska lands).

I would urge GRCA to acknowledge the existing ecological protection and extensive planning base information that is available for the Niska Lands area, and to work expeditiously to finalizing a management plan. I do not take issue with the 3 recommendations outlined in the draft Management Plan.

All the best in the completion of your work,

Comment #15
June 14, 2023

I absolutely do not support the sale of the land holdings on Niska especially if the plan is to develop this area including the farm land for residential or industrial use. PLEASE leave this area as it is.

Comment #16
June 17, 2023

Hello - I oppose opening more of the land for development, work with the city if you have maintenance problems, but the answer is not selling conservation land

Comment #17
June 20, 2023

Dear Chair, Board and GRCA staff,

The Guelph Hiking Trail Club would like to acknowledge the work that has been done to bring this “Niska Land Holdings Management Plan” into this phase of the process.

The Guelph Hiking Trail Club is in a unique position to comment on the recommendations.

- The Club has trail maintenance licence agreements with the Authority at Starkey Hill and Smith Property.
- We have managed the Speed River Trail, which runs from Guelph to Cambridge for 50 years. Part of this recreational trail runs through the Niska Land Holdings to the west of the Speed River.
- Working with the City of Guelph we received a GRCA permit to install a pedestrian bridge to the south of Crane Park on city lands. The club managed the project and led a campaign to raise \$65000 to fund the project. The bridge was installed in January 2023 and had an official “Grand Opening” celebration on June 3rd of this year with an associated tree planting activity. This bridge gives safe access to city lands adjacent to the Niska Land Holdings.

On behalf of the Guelph Hiking Trail Club **we support the 3 recommendations** outlined in the Niska Land Holdings 2023 Draft Management Plan and look forward to being an active partner in the development of Niska Lands in concert with two of GRCA’s stated objectives;

To connect people to the environment through outdoor experiences and to manage landholdings in a responsible and sustainable way.

Comment #18**June 21, 2023**

(Respondent submitted multiple comments – 5,7,18,19)

My hope would be that GRCA would not sell/develop the Niska land indicated in the proposal. The wetlands and Speed river are unique and offer many different plant and animal life as indicated in your report. These lands hold an important role in the ecosystem and is crucial to maintaining balance.

Comment #19**June 21, 2023**

(Respondent submitted multiple comments – 5,7,18,19)

I am a concerned tax paying citizen with regards to the proposal For the Niska Land. The land currently offers green space for the neighbouring community. The trails offer a natural and beautiful pathway giving opportunity to appreciate the waterways, bird, animal and plant life. The way god intended. By incorporating compact gravel or pavement trails would create another man made trail system and take away from the lands beauty. It is crucial that the lands are preserved and not turned into another man created project.

Comment #20**June 21, 2023**

This is a comment regarding the Niska lands to be discussed at the upcoming meeting of the GRCA board. I would like to encourage the GRCA Board to approve the draft management plan. With that, the GRCA can engage with the City of Guelph to explore opportunities to enter into a maintenance agreement to maintain portions or all of Niska. Thanks.

Comment #21**June 22, 2023**

The Niska Land Holdings, and the other surrounding natural areas, have been an important part of my family's life ever since we moved to Guelph's south end more than thirty years ago. My children grew up exploring its trails and waterways, and I still walk in the woods nearly every day. Guelph is lucky to have such a beautiful, accessible natural area, and it should be expanded, not diminished. I applaud the GRCA's work to develop a draft management plan so that the Niska Land Holdings can be conserved for future generations. However, I am alarmed by the GRCA's proposal that the agricultural field south of Niska be declared surplus and sold off. Although I understand that the field may not currently align with the mandate of the GRCA, selling it off would be a wasted opportunity. Instead, the field should be incorporated into the broader trail system proposed in Recommendation 1 of the 2023 Draft Management Plan. It could be reforested, re-wilded, or turned into a recreational area for families; it could even host a parking lot so that more people can enjoy the nearby woods. But opening the land up to development would spoil the the area's integrity and erode its natural beauty. I urge the GRCA not to dispose of of the agricultural field south of Niska.

Comment #22**June 24, 2023**

To Whom It May Concern,

I am writing on behalf of Trout Unlimited Canada and our local Speed Valley Chapter regarding your public call for comment on the GRCA's Niska Land Holdings Management Plan.

Trout Unlimited Canada (TUC) is a national, not-for-profit charity that is science-based and volunteer driven. Partners and volunteers are paramount to the numerous successful river restoration projects we implement every year. Through our Speed Valley Chapter, we have a long history of working to protect, enhance, and restore Hanlon Creek, which flows through the Niska Land Holdings and where it meets the Speed River. Our work protects and enhances water quality, water flow, aquatic and riparian life, community health, and creates additional benefits of a healthier environment. TUC is proud of the critical role our organization has played in the protection of freshwater environments for over 50 years and the value we provide to the lives of Canadians.

We welcome your call for comments on the recommendations in the Niska Land Holdings Management Plan, which we provide below:

Recommendation 1: *Engage with the City of Guelph and other third parties to explore opportunities to enter into a maintenance agreement for parcels of land that can provide recreational or conservation opportunities.*

TUC is fully in support of Grand River Conservation Authority (GRCA) engaging with the City of Guelph and other third parties to explore opportunities to enter into a maintenance agreement for parcels of land that can provide recreational or conservation opportunities. TUC is interested in being involved as a third-party partner should the City of Guelph enter into a maintenance agreement over the land holdings.

Recommendation 2: *Continue to advocate and promote partnership opportunities to manage and monitor the biodiversity and ecological systems within the land holdings.*

TUC is fully in support of GRCA advocating and promoting partnership opportunities to manage and monitor the biodiversity and ecological systems within the Niska Land Holdings. Indeed, our organization would welcome the opportunity to expand our work on Hanlon Creek into the land holdings, including but not limited to water temperature monitoring, aquatic species surveys, stream and riparian restoration, and enhancing stream connectivity.

Recommendation 3: *Dispose of lands south of Niska Rd. that are associated with the agricultural lease and identify other lands that could be suitable for disposition.*

This matter falls outside of TUC's mandate, and we do not have comment as to whether these lands should be disposed of, however, if the lands identified are disposed of, we advocate for the implementation of stormwater runoff management best practices.

Thank you for this opportunity for comment. Please contact us if you have any questions.

Comment #23

June 25, 2023

The proposed sale of lands for residential development should be supported by the community, and is an initiative that I support personally. The land has been designated in the Official Plan as such for a number of years, is a natural extension of the adjacent residential uses, it is on tableland, and the Authority does need the money, in light of a series of grievous cuts to MNRF grants since 1995. The Authority could increase the sale value of these lands by expediting completion of the City-proposed trail along the river (per its Guelph Trail Master Plan) from Pioneer Road to its Crane Park property.

The plan omits mention of a number of man made assets, features or disturbances to the property, namely:

- the closed “municipal” roadway that was built into the Hanlon Creek valleyland, running north, off the end of Ptarmigan, and that was apparently abandoned due to opposition from neighbouring residents (c. 1980?)
- the steel Eagle footbridge at the end of that roadway, crossing Hanlon Creek
- the City’s sewer easement associated with the roadway
- the City’s easement for a sewer, which runs along much of the north side of the property westerly to Stone Road West
- the very old/heritage dam embankment on the north side of the creek, north of the field.
- the dike paralleling the river, on the section west of Pioneer and south of Niska Roads.
- the road system (also on this section of the property) that apparently once served a campground or picnic area, and that appears to link to the end of the dike. The GRCA’s 1982 Master Plan shows these roads and the dike as “existing trails”, but they are now somewhat overgrown. The roadway and the dike top will serve as a solid basis for the City-proposed trail from Crane Park to Pioneer Road, a proposal that has been specified in the Guelph Trail Master Plan since 2005.
- the large gravel parking lot on tableland behind the main gate to the property (which would be capable of supporting the potential sports fields in the fields north of Niska)
- the small gravel parking area for the Speed River Trail and the John Wood 2 Sidetrail on the portion of the property west of the Niska bridge over the Speed River, which straddles the road allowance and Authority lands, and as is maintained by the City for 4 season use. Trails have been in use on this portion of the property, with GRCA permission, since 1973. These trails were rationalized in 2007 based on a GHTC written request and an approval by Martin Neumann, GRCA forester.
- the area of gravel and silt deposited into the PSW from stormwater flows off of the south side of the Niska road allowance onto GRCA lands south of Niska, prior to the road reconstruction project
- over 500 feet of boardwalk and some half dozen small wooden bridges (apparently being reasonably well maintained by residents from the nearby neighbourhoods)
- an extensive network of footpaths, most of which had been already shown as “existing trails” by GRCA staff in 1982 in their authoring of the GRCA’s Hanlon Creek Conservation Area Master Plan, plus other trails completed and being maintained by neighbouring residents
- on the Niska Road allowance, the 3 metre wide multi-use path, completed by the City as part of its reconstruction of Niska and its bridge over the Speed River, in order to bring local residents to the trailhead for the Speed River Trail

Daily access to the property has been enjoyed for many years on the many existing trails by local residents/dog walkers, given the adjacency of to several large residential areas, and specifically:

- up and down the Hanlon Creek valley from both ends of the Eagle bridge on the "Ptarmigan roadway extension", as well as from multiple points to the south along that roadway
- along the trail atop the sewer easement within the north east boundary, as accessed from Stone Road West and a City property fronting on Woodland Glen Path
- from trails in the adjacent City of Guelph's Crane Park on the northwest boundary of the property
- from a trail into the Hanlon Creek valley from Authority land fronting on Niska, slightly east of and opposite from Tanager Court
- from the terminus of the City's multi use path at small parking area on Niska (in Puslinch) for access to the Speed River Trail and John Wood 2 Sidetrail
- and less regularly, in winter, spring and fall seasons, from the adjacent Pioneer Trailer Park, along the riverbank and also atop the dike.

The plan does not note the existence of other materials remaining on the property, that should be removed as part of further decommissioning, specifically: sundry chain link fencing inside the former waterfowl park near the river, and corrugated iron roofing left on the parcel south of Niska next to the former roadway.

The plan errs in indicating trails on a map as being part of the City's trail system, as they are on Authority property and are not managed by the City under any agreement to date.

The original vision of the 1982 Master Plan for the Hanlon Creek (Preservation Park) wetland, and the length of the valley of Hanlon Creek, ending at the Niska Waterfowl Park, has not been mentioned in the management plan. The Master Plan Concept (Figure 8.1) proposed a continuous trail running from its large wetland holdings east of the Hanlon, down the creek valley to the Speed River. In fact, a trail underpass was completed by MTO beneath the Hanlon Parkway (c.1970) at the request of both the City and the Authority *for the very reason* that it would enable completion of the trail along the valley (not in close proximity to the creek, however) so as to connect the wetland east of the Hanlon Parkway to the Niska Waterfowl Park and the Speed River. Since that time, the City has acquired lands in the valley to the west of the Hanlon sufficient to enable such a trail to be completed.

The Authority succeeded in gaining an agreement for the City to manage its larger holdings along Hanlon Creek east of the Hanlon Parkway in recent years. As these lands also lie within the City it would seem entirely appropriate for the City to also manage the undevelopable portion of all the Authority lands to the west of the Hanlon as well. It is most perplexing to the public as to why such an agreement has not been struck to date and implemented. After so many years have passed since the waterfowl park closed and the tenancy expired, the expectation of Guelph residents is that the property will be reopened in the near future, presumably under "new management."

The Management Plan should be amended to include two appendices:

- a listing of the works performed by GRCA to decommission the former Niska Waterfowl Park, and the total cost of this work
- a listing of the *specifics* of additional safety issues (pursuant to the suggestion on page x of the Plan) that remain to be dealt with before the property can be re-opened to the public

Comment #24
June 25, 2023

I would like to enter comments on the recommendations of the Niska Land Holdings Draft Management Plan. I was a delegate at the meeting that recommended a Management Plan, so I feel that it is important that I register my feedback.

I was also part of the Speed River Valleylands Working group, and President of Architectural Conservancy of Ontario, Guelph and Wellington Branch who supported the working group and neighbourhood association in its efforts to preserve the Niska Bridge.

I am greatly concerned that the recommendations in the draft Management plans fail to recognize the cultural heritage of the Niska area landscape as a whole. Replacing the heritage Niska Bridge and widening Niska Road caused huge damage to the natural and cultural heritage of the Speed River Valley. The recommendation to sell off the south portion of the former Kortright Waterfowl Park, and Hanlon Creek Conservation area will do even more damage to the river valley.

I applaud the recommendation to preserve the northern section of the former Waterfowl Park for recreational and conservation opportunities like a trail system, however the recommendation to sell off the southern portion for more housing sprawl is egregious and contrary to sustainability. The Niska Wildlife Foundation, following in the footsteps of Howard Mack, stated its primary goal to “increase public awareness of wildlife resources and their preservation.” Although ridiculed today, the purpose of those lands was to foster Canada geese who were an endangered species at the time of the founding of the Waterfowl park.

Today we need agricultural lands to feed our growing populations; the alarming sprawl of housing subdivisions in southern Ontario is destroying those much-needed farmlands. To sell off this prime land south of Niska is to sell off an important part of our food supply, and to allow even more paving over of our province. The proposed housing would threaten our groundwater supply as well.

You do not mention any consultation with any First Nation, especially the Mississaugas of the Credit First Nation who are the stewards of the lands along the Speed River. I’m sure they would be interested in your findings and should be consulted before you make any decision on these Niska lands.

We spent hundreds of hours in fighting the loss of the heritage Niska Bridge and the widening of Niska road into the natural areas along its edges. Please do not contribute to the further degradation of the area by selling off this land for more urban sprawl.

Comment #25
June 25, 2023

Apparent Omissions and inaccuracies in the Niska Landholdings 2023 Draft Management Report
I was surprised to see that the management plan is only a brief 30 pages long for such an important ecologically sensitive property.

My comments and concerns:

Section 3.2.4 Hydrology and Hydrogeology

How can the GRCA predict the impacts of declaring this land surplus with knowing its contribution to the base flow of the Speed River? There is no watershed plan for the Speed River. The PPS section 2.2.1 states "Planning Authorities shall protect

Improve or restore water quality and quantity by "using watersheds as the ecologically meaningful scale for integrated and longterm planning."

The 8 hectares on the south side of Niska are identified in the Tier 3 Water Budget and Local Risk as having a significant recharge reduction risk. There is no overland runoff from this property all rainfall is recharged. I have several years of pictures to illustrate this. Figure 4 does not show the shallow groundwater flow on the 8 hectares south of Niska. Why not?

This section does not reference the findings in the Class Niska Rd. Improvement EA. which discovered areas of significant groundwater discharge into the Speed River in the area of the Niska Rd. Bridge. This discharge provides refuge for the brook trout in the summer and creates an ice free environment for waterfowl in the winter. This area of the River is listed by the MNRF as a Provincially Significant overwintering area for waterfowl.

Has the GRCA identified the source of the TCE contamination ?

Furthermore, a reduction in groundwater recharge into the Speed may reduce the summer low flow conditions downstream from our Wastewater Treatment Plant. Affecting dilution of the wastewater. Alterations to the groundwater regime may also impact the provincially significant groundwater seeps on the north side Niska. There is inadequate info in this report to identify future problems.

The management plan does connect or discuss the hydrological importance of the Niska lands to the health of the Speed River and the Hanlon Creek this is a major flaw.

Section 4.2 Current GRCA Management Practices .

? What management practices? There has been a long-standing history of neglect of the Niska lands by the GRCA. The role of the GRCA in the long term deterioration of the former Niska Waterfowl Park has been omitted. In 1977 the GRCA acquired a world class nature facility that was supposed to form a key portion of the Hanlon Creek Conservation Area. When the 8 hectares on the south side of Niska RD were annexed into the city of Guelph from Puslinch Township they were placed into a P1 parkland zoning in preparation for the incorporation of this portion of the Niska Waterfowl Park into the Hanlon Creek Conservation Area. The Master Plan for the Hanlon Creek Conservation Area is listed in the references. Why does this management plan not discuss the option of implementing the the Hanlon Creek Conservation Area Master Plan? Especially given that the GRCA is already aware of the overuse of it other conservation areas? The City of Guelph Parks and Recreation Plan 2022 describes a future shortage of parkland and the need in future to purchase more land for parks, so how can this land be declared surplus?

As the landlord the GRCA was entitled to inspect the park yearly and the lease indicated that the park facilities were to be maintained in good condition. Instead, under the GRCA a world class nature facility with 45,000 visitors a year was allowed to fall into wrack and ruin. In 2014 the GRCA closed the park so why has it taken almost 10 years to produce this management plan? Thousands of hours of volunteer hours used to build an outdoor viewing towers, an outdoor auditorium and other facilities were wasted

when the park facilities were demolished. The Niska lands were supposed to be transitioned into a nature reserve. Years have been wasted that could have been used to plant and establish meadow habitat and forest habitat. An initiative that could have added to the overall forest cover in the watershed.

The management plan does not acknowledge that there is a balance of \$3,861,668 in the Land Sale - Valley Land - Guelph as of Dec. 2021. This reserve increased to \$5,194,168 as of Sept 2022. Why isn't this reserve fund being put to use? How much of the fund dates back to the original Valleylands Project Fund?

4.2.1 Agriculture

The Management Plan Section 4.2.1 describes the agricultural fields but does not mention their historical importance to the waterfowl park as sources of feed and food for overwintering waterfowl in the Speed River. There is no alternative ecological uses suggested. These fields were to be part of the nature reserve in the Hanlon Creek Conservation Area.

These fields could be rehabed into meadow and field habitat for species in decline such as field birds and wildlife dependant on open meadow areas.

Section 3.3 Terrestrial Resources

Where are the maps showing the ECL's??? Without them I cannot determine how your ECL identification compares to the ECL's in previous studies. Please provide these maps.

What were the exact dates of your surveys? Were 4 season surveys completed? Please provide this information.

I found it disturbing that the GRCA did not reference or make use of the extensive lists of species and ELC's found in the Niska Rd. Improvement Class C EA? As a reviewing and commenting agency for the EA the GRCA did review these reports so please explain this omission?

Please amend your report to include this data. Otherwise you cannot state that "all observations historical or recent have been noted"

Eg. Endangered bats on Niska lands found during the EA study for Niska Rd but are not on your list why not? This is a major omission not identifying a federally protected species.

The terrestrial section should be expanded before any decisions are made re surplus land. The identification of SWH and candidate SWH should be made now not after any decisions are made to declare land surplus because many species use different habitats at different times in their lifecycle. How can you do this later? It should be done now as part of the plan. After all isn't that the purpose of a proper management plan - to identify what needs to be protected or restored? Without this determination your management plan is incomplete.

3.4. Aquatic Resources

Not complete. Since the fish in the Speed River may be dependant on groundwater recharge from the Niska lands this area of the river needs to be surveyed as part of the management plan. Water temperature data loggers should be placed in the Speed River. Brook trout within a major urban city is a unique resource. The GRCA must identify in the Management Plan how they intend to protect and restore their habitat.

Section 3.5 Fauna

Section 3.5.2 and 3.5.3

This section is insufficient and not acceptable. Not acceptable because no formal surveys were conducted of mammals, amphibians and reptiles. This area is a Stratum II Deer winter congregation Area. Where are the deer trails? How can planning occur without data? I suspect that the GRCA would not accept this if they were reviewing reports from the development industry or the city.

Section 3.7. Invasive Species.

No mention of phragmites spreading through wetland area on the north and south side of Niska Rd. During the reconstruction of Niska Rd. The City was willing to remove the phragmites on the GRCA

property on the south side of Niska but the GRCA refused the offer. Since then it has spread filling in this small wetland.

Section 4 Current Management Practices

This section does not mention the problems that have occurred on the Niska lands since park was closed.

Despite the “no trespassing signs”. There has been significant trespassing on the land including off leash dogs , unauthorized buildings, hunting etc. There is even a campsite shown on Google Maps.

Other Problems with the plan. There is no Cultural Heritage section in this plan.

This is very serious omission especially given the Status of the Grand River as a Canadian Heritage River.

The recommendations of Heritage Guelph at their November 9, 2015 Meeting supporting the designation the Niska cultural heritage landscape under section 4 of the Ontario Heritage Act is not included in this plan. Why Not? Without assertion on cultural heritage this management’s incomplete and should be rejected by the Board of the GRCA. What does the GRCA intend to do to support the designation if the land is declared surplus? How will the cultural heritage view shed be protected for all the citizens of Guelph to enjoy?

In conclusion I strongly believe that this plan is incomplete, inadequate and lacks details . Thus if this plan is brought forward in its current iteration I respectfully request that the GRCA Board Members reject this plan and send it back to staff with the funding needed to produce a complete and fullsome plan with details.

Thank you for the opportunity to comment on the plan

I reserve the right to submit comments at a later date if any relevant information becomes available.