

APPENDIX 'B'

August 25, 2020

CFN: 62544.03

BY EMAIL: doris.cheng@richmondhill.ca

Ms. Doris Cheng
City of Richmond Hill
225 East Beaver Creek
Richmond Hill, ON
L4B 3P4

Dear Ms. Doris Cheng,

**Re: D01-20004 (Official Plan Amendment)
D02-20010 (Zoning By-law Amendment)
10684 and 10692 Yonge Street, Richmond Hill
Owner: Sabella Ridge Estates Inc.
Agent: Malone Given parsons Ltd.**

This letter will acknowledge receipt of the above-noted application. Toronto and Region Conservation Authority (TRCA) staff have reviewed the submission and offer the following comments. A list of materials reviewed can be found in Appendix A.

Purpose of the Application

It is our understanding that the purpose of this application is to facilitate the development of a high density residential development comprised of a 28 storey apartment building (rental) consisting of 284 apartment units, 273 parking spaces, a gross floor area of 22,307 square metres and an FSI of 4.3.

Applicable Regulations and Policies

The TRCA provides our technical review comments through a number of roles. This includes TRCA's commenting role under the *Planning Act*; the Conservation Authority's delegated responsibility of representing the provincial interest of natural hazards encompassed by Section 3.1 of the Provincial Policy Statement (2014); TRCA's Regulatory Authority under Ontario Regulation 166/06, as amended (Development, Interference with Wetlands, and Alterations to Shorelines and Watercourses); and our Memorandum of Understanding with the Region of York where we advise our municipal partners on matters related to Provincial Policies relevant to TRCA's jurisdiction.

Ontario Regulation 166/06, as amended:

According to TRCA's mapping, the subject properties are regulated by the TRCA as it is located partially within the Regional Storm Floodplain. In accordance with Ontario Regulation 166/06, as amended (Development, Interference with Wetlands and Alteration to Shorelines and Watercourses), a permit is required from the TRCA prior to any of the following works taking place:

- a) straightening, changing, diverting or interfering in any way with the existing channel of a river, creek, stream or watercourse, or for changing or interfering in any way with a wetland;

- b) development, if in the opinion of the Authority, the control of flooding, erosion, dynamic beaches or pollution or the conservation of land may be affected by the development.

Development is defined as:

- i) the construction, reconstruction, erection or placing of a building or structure of any kind;
- ii) any change to a building or structure that would have the effect of altering the use or potential use of the building or structure, increasing the size of the building or structure or increasing the number of dwelling units in the building or structure;
- iii) site grading, including the temporary or permanent placing, dumping or removal of any material originating on the site or elsewhere.

TRCA's Living City Policies (LCP)

The LCP describes a "Natural System" of water resources, natural features and areas, natural hazards, potential natural cover and/or buffers. TRCA policies generally require that natural features within the "Natural System" be protected from development, site alteration and infrastructure. Notwithstanding additional setbacks prescribed by federal, provincial or municipal requirements, TRCA defines the limit of the "Natural System" as the greater of, but not limited to the following:

- Valley and Stream Corridors: 10 metre buffer from the greater of the long-term stable top of slope (LTSTOS), top of slope (TOS), Regulatory Floodplain, meander belt and any contiguous natural features or areas;
- Woodlands: 10 metre buffer from the dripline and any contiguous natural features or areas;
- Wetlands: 30 metre buffer from Provincially Significant Wetlands (PSWs) and a 10 metre buffer from all other wetlands and any contiguous natural features or areas.

CTC Source Protection Plan

Please be advised that the subject property appears to fall within a Wellhead Protection Area Q2 (WHPA –Q2) and Highly Vulnerable Aquifer Area (HVA) under the Credit Valley-Toronto & Region-Central Lake Ontario Source Protection Plan (CTC SPP). TRCA supports the legislated protection of municipal drinking water sources through the *Clean Water Act* and acts as a technical advisor to York Region for some aspects of the CTC SPP. However, municipalities are the approval authority responsible for ensuring that *Planning Act* applications conform to the CTC SPP. Therefore, TRCA staff recommend contacting your local Risk Management Official for further information regarding the CTC SPP requirements.

Application-Specific Comments

Water Resources Engineer:

Water Quantity

1. As the subject site is located within the Don River Watershed, controls are required to ensure post-development flow rates are equal to, or below, pre-development levels for the 2-year through 100-year flow rates. Please clearly show how in the post-development the pre-development levels are met. Further the Appendix (Stormwater Management Report, prepared by WSP, dated April 15, 2020) clearly shows the pre-development flow rates and external flow rates, please provide a summary table for post-development as well.
2. Please provide further clear and concise summary for the parameters used in the HydroCAD model.

3. Please provide calculations for the stage-storage-discharge information.

Water Quality

4. The proponent has proposed an oil grit separator to achieve the enhanced level of protection for water quality control. Please note that TRCA has taken a position parallel to the City of Toronto whereby OGS units, regardless of manufacturer, as a stand-alone measure can achieve up to a 50% TSS removal. Thus, please provide additional mitigation measures in addition to the OGS to achieve the 80% TSS removal. Please provide details, location and if applicable supporting calculations for the additional water quality mitigation measure(s).

Please note that any LID measures required to meet the water balance/erosion control requirements can also be used to meet the water quality targets, especially for those used as part of a treatment train approach.

Water Balance

5. Please note, source water policies are applicable as this site is located in a WHPA-Q area. The water balance will need to show how best efforts have been made to provide measures for mitigation of infiltration demonstrating the pre-development conditions will be met during post-development conditions. Please provide infiltration rate (or an included excerpt from Hydrogeological Assessment, prepared by WSP, dated April 3, 2020). Please note that infiltration measures can still be proposed, as infiltration will still occur even at a low rate, but will require an overflow measure below 15mm/hr as per LID design criteria. As such, in order for TRCA to determine best efforts have been made, all opportunities should be explored to provide infiltration measures to meet pre-development levels as per calculations outlined in the 2003 MOE Stormwater Planning and Design Manual.

Erosion Control

6. The TRCA 5mm retention volume requirement should be above the initial abstraction (Chapter 4 – Figure 4-1, TRCA Stormwater Management Criteria, 2012). Please revise the calculations in Appendix A (Stormwater Management Report, prepared by WSP, dated April 15, 2020) to provide storage for the 5mm of rainfall across the site for the *impervious* area. Therefore, at a minimum the required area is 5mm x impervious area which is approximately 21.9m³. Please review and revise accordingly.

Engineering Drawings

7. Please provide all engineering drawings to TRCA for review and comment, including but not limited to the grading and servicing plans.
8. Please ensure all mitigation measures to meet the SWM criteria are clearly identified and labeled on the drawings, including placement of all required footprints.

Erosion and Sediment Control

9. Please note, at the detailed design stage erosion and sediment control plan(s) will be required that illustrates the location, details, standard notes as well as the phasing/staging of the ESC measures required for the construction of the site. TRCA staff strongly encourage the applicant to explore a multi-barrier approach to be incorporated into the ESC plan. Please provide supporting calculations if applicable.

Please refer to the 2006 ESC Guideline, which can be downloaded from TRCA's STEP website: <http://www.sustainabletechnologies.ca/wp/>.

Floodplain

10. Please provide additional information as to the changes in the MIKE model including but not limited to the model inputs, parameters and results.
11. Please provide the output files and digital model with changes for review and comment. TRCA withholds further comments on floodplain assessment and conclusions for future submissions.
12. Please confirm and quantify if necessary if there is any filling proposed within the floodplain.
13. TRCA staff defer to the City of Richmond Hill to determine if they will provide emergency access to the proposed development from Arten Avenue or access the development in Regional storm event with ponded water on Yonge Street.

Hydrogeology:

14. Please provide additional information in the hydrogeological assessment, including but not limited to post-development mitigation measures analysis for the water balance section.
15. Please provide additional information including but not limited to the infiltration rate for the SWM design to use in the design of the mitigation measures.
16. The Preliminary Hydrogeologic Report (prepared by WSP, dated April 3, 2020) is not yet complete. As per this report, additional boreholes are required to assess potential dewatering requirements and evaluate possible LID options to maintain recharge. TRCA staff can provide more detailed comments once the required fieldwork and assessments are completed.

Permitting

As noted above, the subject properties are located within TRCA's Regulated Area. As such a permit is required from this Authority prior to any works commencing on the subject site, pursuant to Ontario Regulation 166/06, as amended. Details with respect to permit submission requirements are available at our website (<https://trca.ca/planning-permits/apply-for-a-permit/>).

Application Review Fee

In addition to regulatory responsibilities, TRCA has a role as a comment agency for Planning Act applications circulated by member municipalities to assess whether a proposed development may be impacted by the TRCA.

By copy of this letter, the applicant is advised that the TRCA has a fee schedule for our planning application review services. These applications are subject to concurrent Official Plan Amendment and Zoning By-law Amendment review fees of \$8,950.00 (Standard). The applicant is responsible for fee payment and should forward the fee to this office within 60 days of this letter.

Recommendation

On the basis of the comments noted above, it is our opinion that these applications are **premature** as additional information is required prior to TRCA staff supporting the Official Plan Amendment and Zoning By-law Amendment. We request the applicant address the comments noted above to TRCA's satisfaction. Please include a **response letter** within your resubmission outlining how you have addressed each of the technical comments noted above.

We trust this is of assistance. Should you have any further questions or comments, do not hesitate to contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to be 'LB' with a long horizontal stroke extending to the right.

Linda Bui
Planner, Development Planning and Permits
linda.bui@trca.ca, Extension 5289

Appendix A

- Functional Servicing Report, prepared by WSP, dated April 12, 2020
- Flood Impact Study, prepared by WSP, dated April 16, 2020
- Plan of Survey and Topography, prepared by R-PE Surveying Ltd., dated February 10, 2020
- Soil Investigation Report Update, prepared by Soil Engineers Ltd., dated April 8, 2020
- Drawing No. unknown, Adjacent Property Plan, prepared by unknown, dated unknown
- Planning Report, prepared by MGP, dated April 2020
- Stormwater Management Report, prepared by WSP, dated April 15, 2020
- Drawing No. L-1. Landscape Master Plan, prepared by Landscape Planning, dated April 16, 2020
- Architectural Package, prepared by Turner Fleischer, dated April 23, 2020
- Preliminary Hydrogeological Assessment, prepared by WSP, dated April 3, 2020