

Dec.8, 2020

RE: SRPI.20.032 – Request for Approval – Zoning By-law Amendment and Draft Plan of Subdivision Applications – King East Developments Inc. – City Files D02-17041 and D03-17013

In Richmond Hill's official development plan, it states: "It is the intent of this Plan that the identity of Oak Ridges be enhanced, taking an **environment-first approach** through innovative landscape, built form, and environmental design... Development shall enhance the character and identity of the Oak Ridges Local Centre through landscaping, site, and built form design that should be **inspired by the natural features of the Oak Ridges area** through such measures as maintaining views to the skyline to the south, views and **connections to natural features and low impact development technologies.**" (p.132) The subject area is included in the "**low density residential development**" section of the Richmond Hill town plan. As it stands, this development plan is NOT low density. www.richmondhill.ca/en/shared-content/resources/documents/rh-official-plan-proposed-complete.pdf

Being located in the Oak Ridges Moraine and greenbelt area, this project requires greater consideration than a typical development tract. What might be appropriate elsewhere is not suitable for such an ecologically diverse area, which has already suffered a rapid pace of development in only a few years.

I very strongly oppose the current plan for several reasons, and I know many residents of the immediate neighbourhood (Puccini Dr.) feel the same way because I have spoken with several of them - although as more than one has told me, "there's no hope trying to fight the developers." I am taking a personal risk by coming forward, because King East Developments is also my landlord. I have lived in one of the subject properties included on the development plan for almost two years, and I have never lived in an area with so many birds, insects and other creatures. I've lived in small towns in B.C., in Winnipeg and other locations; this small pocket of north Richmond Hill reminds me of a mountainside road because of all the large evergreens and other large trees located on the properties included in this proposal. You can see the treeline of our property from several blocks away - and most, if not all, of those trees will be destroyed if this plan moves forward (as has happened on nearby development plots). These trees are part of a mature urban forest that adjoins, and sits at the heart of, all the outlying properties along King Road and Puccini - a thriving greenspace which this plan does not accommodate for preserving in any way.

We have already witnessed hundreds of trees removed from this block (between Yonge and Bathurst, along King Road) in the past two years for other townhome developments. Other than the Humber River conservation area nearby, these properties under review contain the last mature forest in the immediate area.

I also have other serious concerns: several million-dollar homes are going to be demolished to accomplish this plan, including some that were built within the past 10-15 years. Others are

“fixers” that would benefit from updates (like the one my family lives in), rather than being torn down. It’s incredibly wasteful to destroy these homes! Increased density makes sense, but not at the expense of demolishing homes that are perfectly suitable for long-term use. It can hardly be argued that this development improves housing accessibility, when most of the homes will cost a million dollars and up. The parties who gain the most are the developer - who stands to make close to \$200 million - and the city, which will benefit from collecting taxes on almost 200 homes, on what used to be only 23 single lots. I believe these financial incentives have blinded both the developer and the city staff to the crucial issues at hand.

PLEASE NOTE: The original draft plan for the Puccini area is outlined on Map 7 Infill Study, specifically the coloured version (which happens to be much smaller than the other maps in these documents). A very important detail on this map is completely ignored by this development plan: There is a large green patch that constitutes approximately ¼-1/5 of the development area, which I have explored on foot and includes a forested area, small ravine and wetland/natural drainage area spanning a large section that would be covered by a road and homes in the current plan. The original Puccini infill plan also shows dramatically less homes than included in the King East plan, which literally jams the homes into smaller than minimum lots in most cases; the original infill plan also doesn’t involve as many new roadways as currently proposed. Pedestrian access is not indicated other than one pathway - this is a community designed for cars, which also means the immediate neighbourhood will bear the burden of about 200+ more vehicles. This will not only have an impact on neighbourhood noise levels, but it will further impact the local wildlife that is disrupted by the loss of greenspace.

At a time when the environment is a concern for everyone, the planning department should practice thorough due diligence when it evaluates each piece of land. I find it hard to believe that the city staff have fully examined the properties in this proposal. Every person who has visited our home has expressed disbelief that the city would allow a pristine parkland like our backyard to be destroyed - it has several fruit trees and huge, mature maples, along with a large garden area. It is perfectly suited to become a community garden or park, but this development will irreparably change the character of this quiet, bird-friendly neighbourhood. By allowing developers to dictate land use, the city is compromising a priceless asset that could be repurposed into a community garden/park, while still allowing development along King Road and on select properties. I agree that many larger single-family properties can be developed into several homes, but not on this scale.

Instead of building around the natural features of this area, this plan intends to completely demolish not only the beautiful homes on the existing lots, but also a considerable tract of greenspace that is used by countless creatures - we’ve kept track of those on our property, which have included: tree frogs, fireflies, many types of dragonflies, more bees and bumblebees than I’ve ever seen in one location (attracted to the many wildflowers in our field), woodpeckers, hummingbirds, bats (seen daily in summertime), owls, hawks, ravens, nesting birds (we’ve had baby bluebirds, cardinals and robins on our property), chipmunks, squirrels, rabbits, coyotes and a large family of yellow finches that visits almost daily. Trillium, wild strawberries and many other plants grow throughout the forested area that connects the properties. We are also right

underneath a “goose superhighway” - large groups of Canadian geese fly directly over this property several times a day when they are migrating and breeding. On any day I can count hundreds of birds visiting the trees on the property where my family lives.

In this plan, I see no inventory of how many trees will be lost with this development. Even with “parkland allowances” and tree replacement fees, the immediate loss will be devastating, and it would take decades to recreate a similar parkland. Within a few blocks, at least 500-1,000 trees have been removed since we moved here, for other townhome developments. In keeping with the “character” of Oak Ridges, I don’t believe Richmond Hill should allow the destruction of the remaining large tracts of urban forest in the area - these are essential to maintain a corridor that birds and other creatures can use to breed and travel between larger conservation areas. We are also only a block away from the Humber River conservation area, which is a hub for migratory birds and wetland animals.

It is completely possible to develop some of these properties without destroying the entire ecosystem. We’ve watched the machines tear down acres of trees within a few days, including a few large apple trees bursting with unharvested fruit. We heard the cries of distress by nesting birds that had been displaced - many shorebirds and geese were using the property behind our home before it was bulldozed for development. When the local bird population lost the small forest nearby, we noticed a direct increase on our property.

I don’t believe city council and staff have properly studied the proposal in terms of preserving greenspace and providing adequate parkland and natural conservation space in the area. Arguing that pre-existing conservation areas are “enough” is short-sighted. The current plan completely disregards the possibility that this land serves as a vital greenspace that could be transformed into a park conservation area, while still allowing partial development. An “all or nothing” approach is not necessary, but allowing a plan to completely bulldoze a large tract of greenspace, in an ecologically protected area, is imprudent and short-sighted.

The Oak Ridges Moraine Act commits to retaining the delicate balance of the water table and natural ecosystem. According to the Oak Ridges Moraine website: “Wildlife corridors are green spaces that allow wildlife to travel from one area to another. These corridors must be preserved because they are essential for the survival of wildlife populations as they provide direct habitat and genetic exchange... The greater the number of corridors and green spaces, and the better connected these areas are to one another, the more healthy our wildlife and plant communities are and consequently so too is the overall biodiversity. Corridors and green spaces provide increased opportunities for human relaxation, education, and wildlife viewing. They also help control or mitigate pollution, temperature, climate and noise. It is difficult to imagine a life in the city where biodiversity continues to decrease; where there is more concrete, more smog and pollution, less green space in which to live, and decreased animal populations. Protecting and restoring green spaces and corridors is necessary to maintain and improve our quality of life.”

https://www.oakridgesmoraine.org/wp-content/uploads/2020/05/Biodiversity_MammalsToronto.pdf

Section 22 of the ORMCP identifies "significant portions of habitat of endangered, rare and threatened species" as one of eight categories of key natural heritage features that must be protected from development or site alteration.

<https://www.oakridgesmoraine.org/wp-content/uploads/2017/09/ORMCP-TP-6-Identification-of-Significant-Portions-of-Habitat-for-Endangered-Rare-and-Threatened-Species.pdf>

"The ORMCP further requires that a natural heritage evaluation needs to be carried out where a development or site alteration is proposed within 120 metres of the feature [which can be "permanent or intermittent streams, wetlands, seepage areas" etc]... Municipalities must take a proactive approach to endangered, rare and threatened species protection by identifying known occurrences within their jurisdiction. This information would be used to identify areas of the municipality both on and off the ORM that may not be suitable for development or for which conditions to develop would be more stringent." The ORMCP specifies that expansion of existing buildings or structures on the same lot are allowed **"if the applicant demonstrates that the expansion will not adversely affect the ecological integrity of the Plan Area."**

If an existing use has adverse effects on the ecological integrity of the Plan Area, any application to expand the building, structure or use or to convert the existing use to a similar use shall be considered with the objective of bringing the use into closer conformity with this Plan. O. Reg. 140/02, s. 6 (7).

Every application for development or site alteration shall identify planning, design and construction practices that ensure that no buildings or other site alterations impede any hydrological functions or the movement of plants and animals among key natural heritage features, key hydrologic features and adjacent land within Natural Core Areas and Natural Linkage Areas. O. Reg. 140/02, s. 20; O. Reg. 141/17, s. 12.

Guiding principles for Richmond Hill development state: "The Town must ensure that public policy decisions are made not just from a strictly economic perspective, an environmental perspective, or even a neighbourhood perspective. Rather, such decisions must be made from the perspective of what is best for the community and the public good as a whole."

In this report, the city recommends cash-in-lieu of parkland, but the nearby parks are already well used by the local population. There are no community gardens or dog parks nearby. The report also notes "modifications to the existing stormwater management pond that is located within a Regulated Area of the Humber River watershed will be required in order to service new development in the area, including the subject development proposal." Also, according to the city report, the proposed development demonstrates an overall "Application" score of 22, which achieves a "good" score and meets the threshold score of 21 points for draft Plan of Subdivision applications. This appears to be a baseline, not a "best practice" guideline.

Also according to the city report: “The applicant’s revised development proposal aligns with Goal Two - Better Choice in Richmond Hill in providing for a range of housing options with the City, as well as Goal Four – Wise Management of Resources in Richmond Hill in utilizing available land responsibly.” I strongly disagree with both of these statements! The “range of housing options” starts at a million dollars, while the use of land does not take into account its environmental impact. There is no mention of environmental impacts or greenspace in the city report at all!

I hope that city staff will scrutinize this plan, and others under review, with an awareness that it is their duty to PROTECT the Oak Ridges region from development that could permanently alter its natural appeal and ecosystem. This neighborhood is defined by its mature trees and vibrant bird population.

A [recent study](#) estimates that North America has lost about 3 BILLION birds since the 1970s. [Fireflies](#), several varieties of [dragonflies](#) and [bats](#) are at risk of extinction. As most people already know, bees are also becoming endangered. There are millions of creatures using these properties, and there is no way to quantify the impact of this development until it’s too late.

I hope the city will make better choices in its attempts to balance development with the needs of this area, but as everyone knows, money talks. One of the nearby residents who spent more than five years fighting this development admitted to me that she was finally offered enough by the developers that she decided to sell her home; she was fed up with paying for lawyers, and she didn’t want to be in the middle of the destruction. Hers is one of the multi-million-dollar homes that is slated to be demolished. For any family, it’s a “dream home.”

Thank you,

Popi Bowman