

July 4, 2022

Mayor & Council, Richmond Hill  
Simone Fiore, Planner [simone.fiore@richmondhill.ca](mailto:simone.fiore@richmondhill.ca)  
Stephen Huycke, City Clerk [clerks@richmondhill.ca](mailto:clerks@richmondhill.ca)

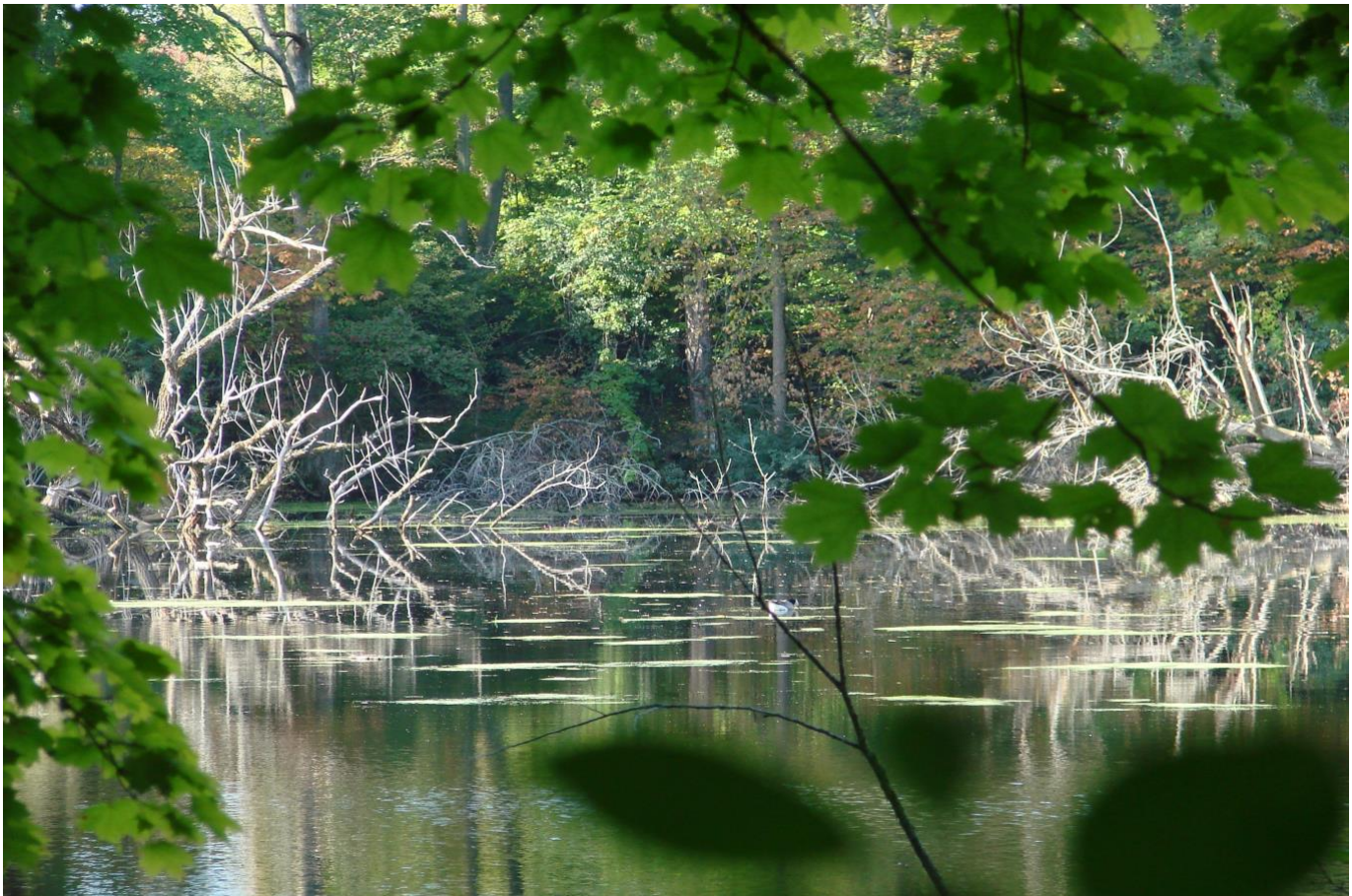


85 DARIOLE DRIVE  
RICHMOND HILL, ON L4E 0Z4

RE: CITY FILES D01-20003 & D02-20009 [13572 & 13586 BAYVIEW AVENUE](#)

York Region Environmental Alliance (YREA) is resubmitting our comments of 2020 in opposition to this application and in support of preserving what is left of this already much compromised Forester Marsh, Environmentally Significant Area (ESA) within the Provincially Significant Wetland (PSW) Wilcox-St. George Wetland Complex of the Humber Watershed. Oak Ridges Moraine wetlands are rare, covering only 2% of the land base and need to be protected. The present proposal is just as unacceptable as the first.

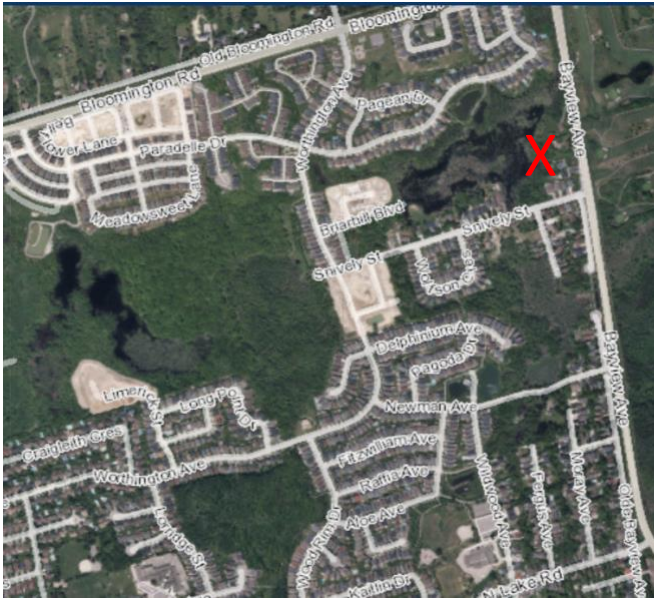
Wetlands are critical to water filtration, flood retention, erosion control, carbon storage, nutrient cycling and groundwater recharge. They also provide habitat for specialized wildlife communities and species at risk. Wetlands enhance our resilience to many of the anticipated impacts of climate change - including flooding, drought, loss of biodiversity and play a critical role in carbon storage. Yet encroachment and development are some of the factors that have left us with only 10% of our original wetlands in southern Ontario. It is not surprising that we are now prone to extreme flooding.



*Wilcox – St. George Wetland Complex, Provincially Significant Wetland (PSW)*

How much development is too much?

In the MNR recommendations of May 2000 they emphasized the importance of maintaining wetland function so as to accommodate seasonal water fluctuations and cautioned that even minor alterations could have dramatic impacts. **Who chose not to listen? Its recharge and discharge function has been seriously compromised as noted in the TRCA report where existing flooding issues persist and will only get worse with more development, additional stormwater and paved surfaces.** Comparing the images from the present with 1970 it is evident that we are at a tipping point in overdevelopment in this area.



Cautionary tales from the past:

- A homeowner and builder on North Lake Rd had to dig 16' foundations because of unstable peat soil.
- During pile driving of foundations of a house on Lakeland Crescent beside my former property, my home suffered a shift, a shattered sliding back door and a cabinet dislodged from a wall.
- 24/7 dewatering in the Humber watershed in Oak Ridges for two full years (Songbird development)
- A faulty dewatering system in a condo in Richmond Hill resulted in the sand and soil layer under the building gradually being pumped away. The building became unstable. It was evacuated for months while remedial work was done. This included filling voids in the substratum, replacing the lost soil and stabilizing the structure. The remedial work cost more than \$7 million.

Building in a bog. Because it is imprudent to build here, this development will unleash untold problems. Who will be held liable when similar occurrences happen in this project, the developer or the City that permitted this development? Is Richmond Hill and the developer prepared to risk class action lawsuits while profits get washed away by flooding? Has an impact analysis (IA) which could assess the opportunities to mitigate and diminish the extent and nature of the effect to habitat been done? YREA cannot envision any ecological offsetting that could make this project viable. We suggested a land swap, among other options, in our previous letter to no avail. It is shameful that this is even being considered again given the net loss to our natural heritage which will never be replaced.

Sincerely

Gloria Marsh, Executive Director

York Region Environmental Alliance [www.yrea.org](http://www.yrea.org)