



January 30, 2025

PAR-DPP-2024-00458

By Email Only (email: kaitlyn.graham@richmondhill.ca)

Kaitlyn Graham
Project Manager
225 East Beaver Creek Road
Richmond Hill, ON
L4B 3P4

Dear Kaitlyn Graham,

**Re: Official Plan Amendment OPA-24-0008
Zoning By-law Amendment ZBLA-24-0015
24 Brookside Road
City of Richmond Hill, York Region
Owner: Monage Corp.**

This letter will acknowledge receipt of the above noted Official Plan and Zoning By-law Amendment Applications received by Toronto and Region Conservation Authority (TRCA) on December 19, 2024. A list of materials reviewed by TRCA is included in Appendix 'A'.

TRCA staff have reviewed the application in accordance with the Conservation Authorities Act (CA Act) and its associated regulations, which require TRCA to provide programs and services related to the risk of natural hazards within its jurisdiction. Whether acting on behalf of the Ministry of Natural Resources (MNR) or as a public body under the Planning Act, Conservation Authorities (CAs) must help ensure that decisions under the Planning Act are consistent with the natural hazards policies of the Provincial Planning Statement (PPS 2024) and conform to any natural hazard policies in a Provincial Plan.

In addition, TRCA staff have also reviewed this application in accordance with TRCA's permitting responsibilities under Section 28.1 of the CA Act. Where development activities are proposed within a TRCA Regulated Area (i.e., river or valley, wetlands, hazardous lands, etc.), a permit is required from TRCA. TRCA must ensure that where a proposal is within an area regulated by TRCA, that the proposal conforms with the appropriate policies of Section 8 of TRCA's Living City Policies (LCP), which evaluate a proposal's ability to meet the tests of the CA Act and regulation.

Purpose of the Application

It is our understanding that the purpose of the above-noted applications is to permit a high density residential development comprised of a 23 storey apartment building on a six (6) storey podium.

Site Context

O. Reg. 41/24 and CA Act:

A large portion of the subject property is located within TRCA's Regulated Area of the Rouge River Watershed and is subject to O. Reg. 41/24 and the CA Act. The subject property is regulated by TRCA as it is traversed by the valley corridor of a tributary of the Rouge River. While the valley walls are not steep, they along with the meanderbelt associated with the watercourse do represent a possible erosion hazard. The flood plain associated with the watercourse also represents another natural hazard of interest to the TRCA. As such, a TRCA permit in accordance with Section 28.1 of the Conservation Authorities Act will be required for development activity within TRCA's regulated area.

Background

TRCA staff previously reviewed a number of concept development proposal for the subject lands as well as formal planning applications including Official Amendment D01-14005, Zoning By-law Amendment D02-14031, and Site Plan Application D06-19061. Through our review of these previous planning applications, the limits of development were established to our satisfaction based upon the natural heritage and hazard conditions at that time.

While we note the development limits as currently proposed in this current application are generally consistent with those previously established, some minor changes have occurred to the natural hazard (flood plain) limit and should be reflected in the current proposal.

Application Specific Comments

TRCA has reviewed the circulation and offer our detailed comments in **Appendix 'B'**, which can be addressed at detailed design. However, we wish to note the following which should be addressed at this time as part of the Zoning By-law Amendment to ensure the Zoning Schedule accurately includes the extent of the currently modeled flood hazard.

Regulatory Flood Plain Hazard

Please note that the Regulatory Flood Plain through this stretch of the Rouge River watershed was updated in 2020. As this is a new application, the location of the most current floodplain should be delineated on all relevant drawings to ensure development does not encroach into the flood hazard or the requisite buffer area. As noted in our previously sent DARC comments (e-mail dated June 8, 2023), the **2020 floodplain elevation varies from 251.49 m to 205.45 m, north to south.**

We note that the current flood line does not differ substantially from the previous flood line, however, there are some increases near the access driveway to Brookside Road and the exact extent of the hazard and buffer should be identified. The applicant should reach out to TRCA water resources engineering staff to acquire the most up to date floodplain mapping for delineation purposes on the subject property

Application Review Fee

By copy of this letter, the applicant is advised that the TRCA has implemented a fee schedule for our planning application review services. This Zoning By-law and Official Plan Amendment application is subject to a fee of \$10,165 (combined Official Plan Amendment and Zoning By-law Amendment Fee). The applicant is responsible for fee payment and

should forward the application fee to this office within 60 days of this letter. For more information regarding this fee, the applicant can refer to TRCA's planning services fee schedule: <https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2024/05/03120946/Development-Planning-Fee-Schedule-November-10-2022.pdf>

Recommendations

Based on the comment above relating to the delineation of the regulatory flood plain, TRCA staff consider the proposed Zoning By-law and Official Plan Amendment Application **premature**. The detailed comments found in Appendix 'B' can be addressed at the detailed design stage.

I trust these comments are of assistance. Should you have any questions or comments, please contact the undersigned.

Regards,

Anthony Sun, RPP, MCIP
Senior Planner
Development Planning and Permits
Tel: (437) 880-2283

Appendix 'A': Materials Reviewed

- Circulation Memo;
- Architectural Drawing Set, prepared by Arcadis Architects, dated October 18, 2024;
- Comment Response Matrix, prepared by WND Associates, dated November 19 2024;
- Draft Official Plan Amendment;
- Draft Zoning By-law Amendment;
- Functional Servicing and Stormwater Management Report, prepared by Greck and Associates Limited, dated October 25, 2024;
- Geotechnical Investigation Report, prepared by Canadian Engineering Group, dated November 14, 2023;
- Hydrogeological Study & Dewatering Impact Assessment, prepared by WSP, dated November 24, 2023;
- Topographical Survey, prepared by Salna Surveying, dated September 14, 2013;
- Water Balance/Budget Analysis prepared by Canadian Engineering Group, dated February 23, 2024.

Appendix 'B': Detailed Comments

Water Resources Engineering

1. At detailed design, additional details, including but not limited to the following, on the SWM design will be required to demonstrate the required 5 mm retention volume for erosion control has been provided on site.
 1. Green roof details and specifications outlining the provided retention capacity.
 2. Provided retention volume calculations, based on the total green roof area per the architectural drawings and green roof retention capacity.
 3. Water reuse calculations to ensure the cistern is drawdown in 48 hours per TRCA SWM criteria.
 4. Cross sections through the proposed SWM tank illustrating the retention volume is proposed below the outlet invert.

2. The floodplain illustrated on the site drawings appears to be inaccurate. Please reach out to TRCA water resources engineering staff to acquire the most up to date floodplain mapping for delineation purposes on the subject property. Please revise the drawings to include the accurate floodplain and associated 10 m setback, to illustrate all development has been located outside of the floodplain hazard and setback.

Hydrogeology

3. The Hydrogeological Report, Functional Servicing Report and Water Balance Study all note that there will be a post-development reduction in recharge. The REC-1 Policy of the CTC Source Protection Plan requires best efforts at mitigation. However, no recharge mitigation is proposed. With a fully waterproofed foundation (as recommended in the Hydrogeological report), some LIDs should be possible on the site.

4. There are references to a fully-waterproofed foundation in all three reports, but the dewatering calculations do not take this into account. Given that impacts to the nearby watercourse from the dewatering are anticipated, the calculations should be redone with waterproofing in place, to ensure that impacts to the watercourse are mitigated.