

From: Michael Manett

Sent: Friday, August 22, 2025 1:01 PM

To: Salvatore Aiello salvatore.aiello@richmondhill.ca; Edwin Li edwin.li@richmondhill.ca

Cc: Clerks Richmondhill clerks@richmondhill.ca; robert salna; Robert Salna OLS Dover Investments; Tomas Vilde tvilde@mplaninc.com; mplanning@rogers.com

Subject: Comments and Input on the City's Comprehensive Zoning By-law on behalf of Robert Salna - City Files: MZBA-23-0001

Sal/Edwin,

Further to the Notice received regarding the Council Public Meeting scheduled for September 2, 2025, the following comments are provided as input to the process related to Council's consideration of the proposed City's Comprehensive Zoning By-law on behalf of Robert Salna.

I represent Robert Salna and his holdings in the City of Richmond Hill at:

83 Sylvan Crescent
107 North Lake Road
10217-10225 Yonge Street

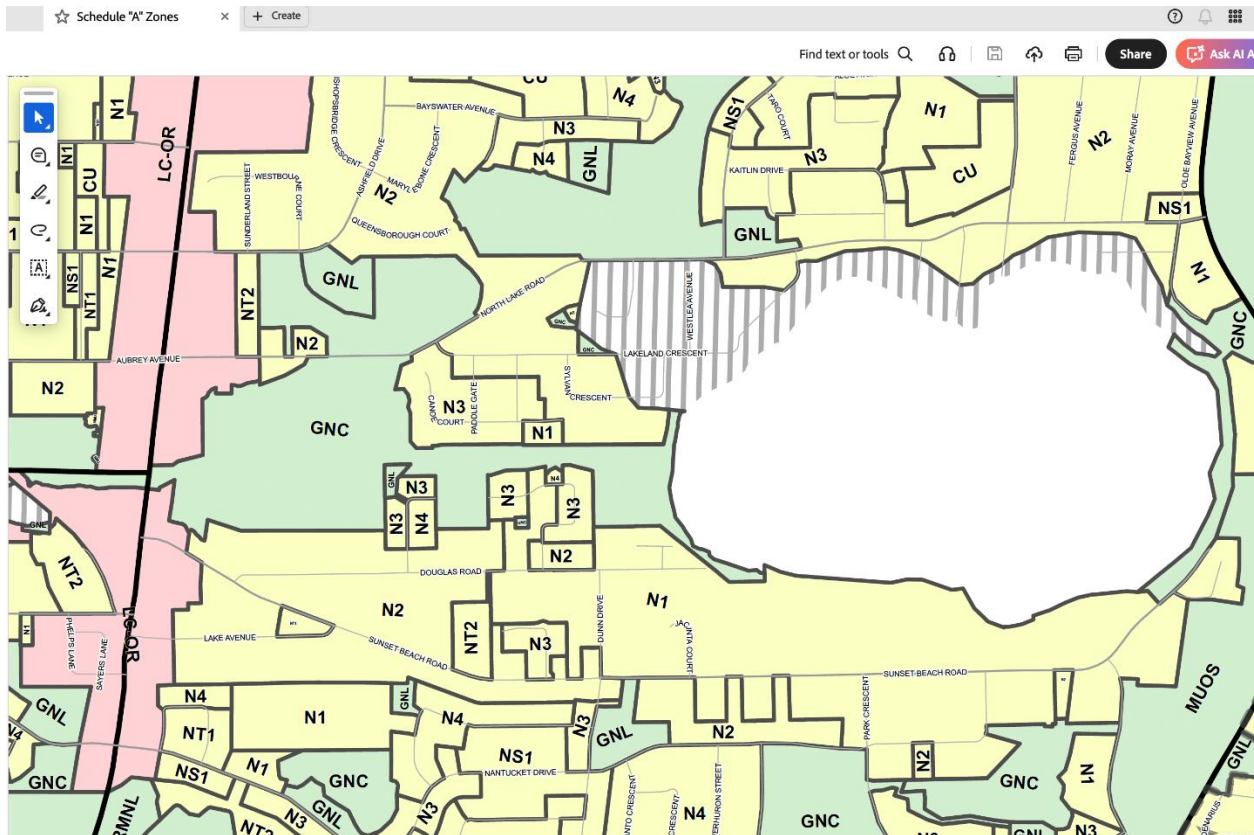
I acknowledge receipt of the latest draft CZBL text and schedules & overlays.

I understand the proposed CZBL is to replace Bylaw 30-25, which was appealed to the OLT and subsequently withdrawn from the associated OLT hearing by Counsel, acting on behalf of the City, due to an error in the required Public Notice. This process is highly unusual and remains problematic.

It is also my understanding that the City is now bringing forward a replacement Comprehensive Zoning By-law, the subject document which now encompasses the entire City, notwithstanding that some areas identified on the By-law Schedules are identified as "Exempt". I have been unable to find any description or section of the By-law text addressing the term "Exempt" and how those areas on the schedules should be interpreted. Please advise where this information is to be found in the Proposed By-law.

The comments below deal with the Salna properties referenced above.

83 Sylvan Crescent

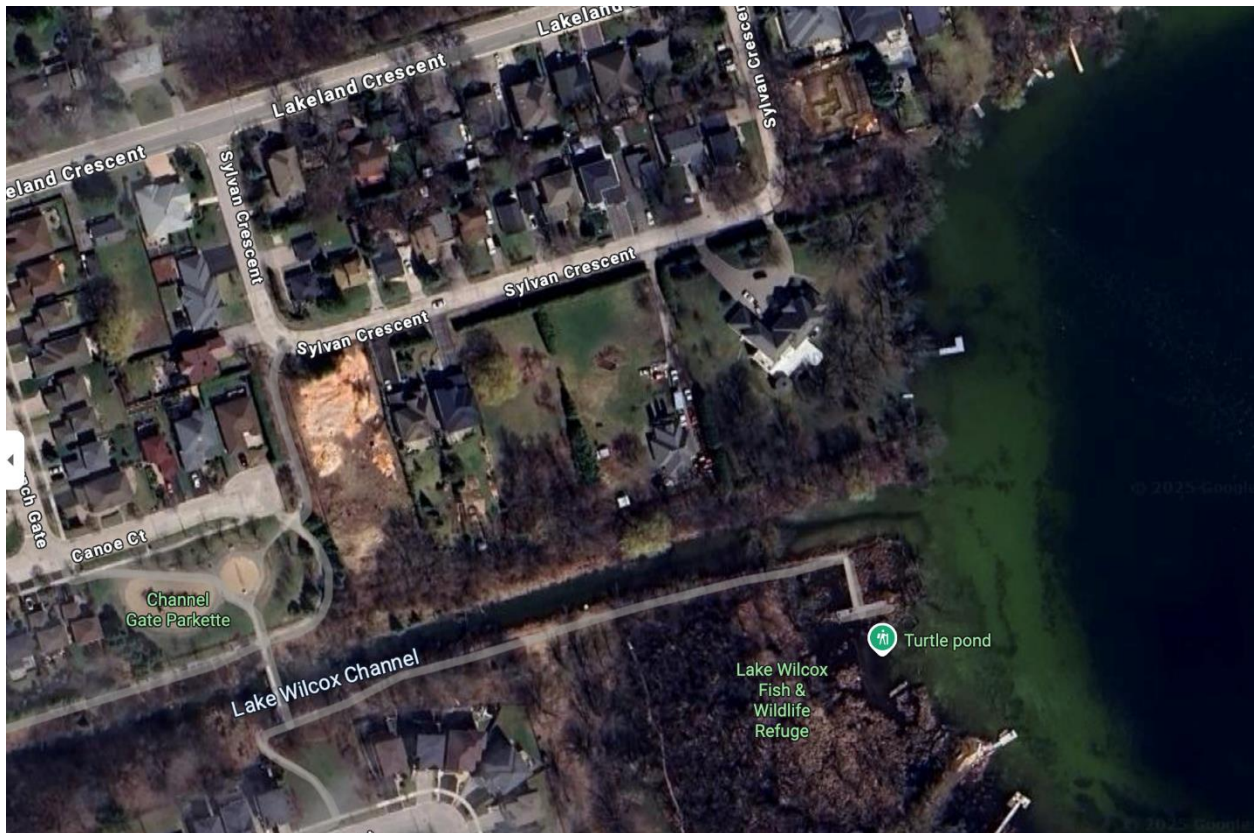


Per the excerpt from Draft Schedule A above, the 83 Sylvan Crescent property appears to be located partly within the hatched area in grey (which is stated to be an Exempt Area) and partly within the area designated N2. There appears to be a small amount of GNC designated land as well on the east side of the lot adjacent to the entrance to the channel that flows from Lake Wilcox.

It remains unclear where this new line work and designation boundaries (representing new zones) comes from, and how it has been justified. Further, from this Schedule, we cannot determine the limits of the zone.

The City has not explained why all of 83 Sylvan Crescent is not within the N2 designation proposed. On Schedule "A", almost all of Salna's lands are shown as N2, however, a review of Overlay "E" indicates that most if not all of 83 Sylvan and the surrounding neighbourhood is identified as TRCA Regulated Land. Please confirm if the N2 permission for ARUs, as per section 3.18 of the By-law, applies to the Salna lands at 83 Sylvan Crescent.

The property is developed and there is new housing developed on the south side of Sylvan Crescent, created as a result of previous severances from 83 Sylvan.



It's now 2025 and other than the technical information provided by Salna (through Greck & Associates Engineering) to the City and TRCA in 2024, the City has no current (updated) flood plain modelling or mapping for the area next to Sylvan Crescent and adjacent to the west/north west shore of Lake Wilcox.

The most recent modelling was undertaken by Greck in 2023/2-24 and Greck's modelling demonstrates a significant error in the TRCA floodline elevation for Lake Wilcox. The magnitude of the error is ± 1 m in high.

The modelling undertaken by TRCA external consultants was not done properly. The model did not account for the significant flood storage and attenuation created by the adjacent wetlands.

Put simply, City and TRCA staff artificially created a floodplain where no floodplain existed and where safe access exists to the property on Sylvan Crescent via a municipal road. Therefore, it is questionable as to the accuracy of the TRCA Regulated Area as illustrated on Overlay "E".

107 North Lake Road

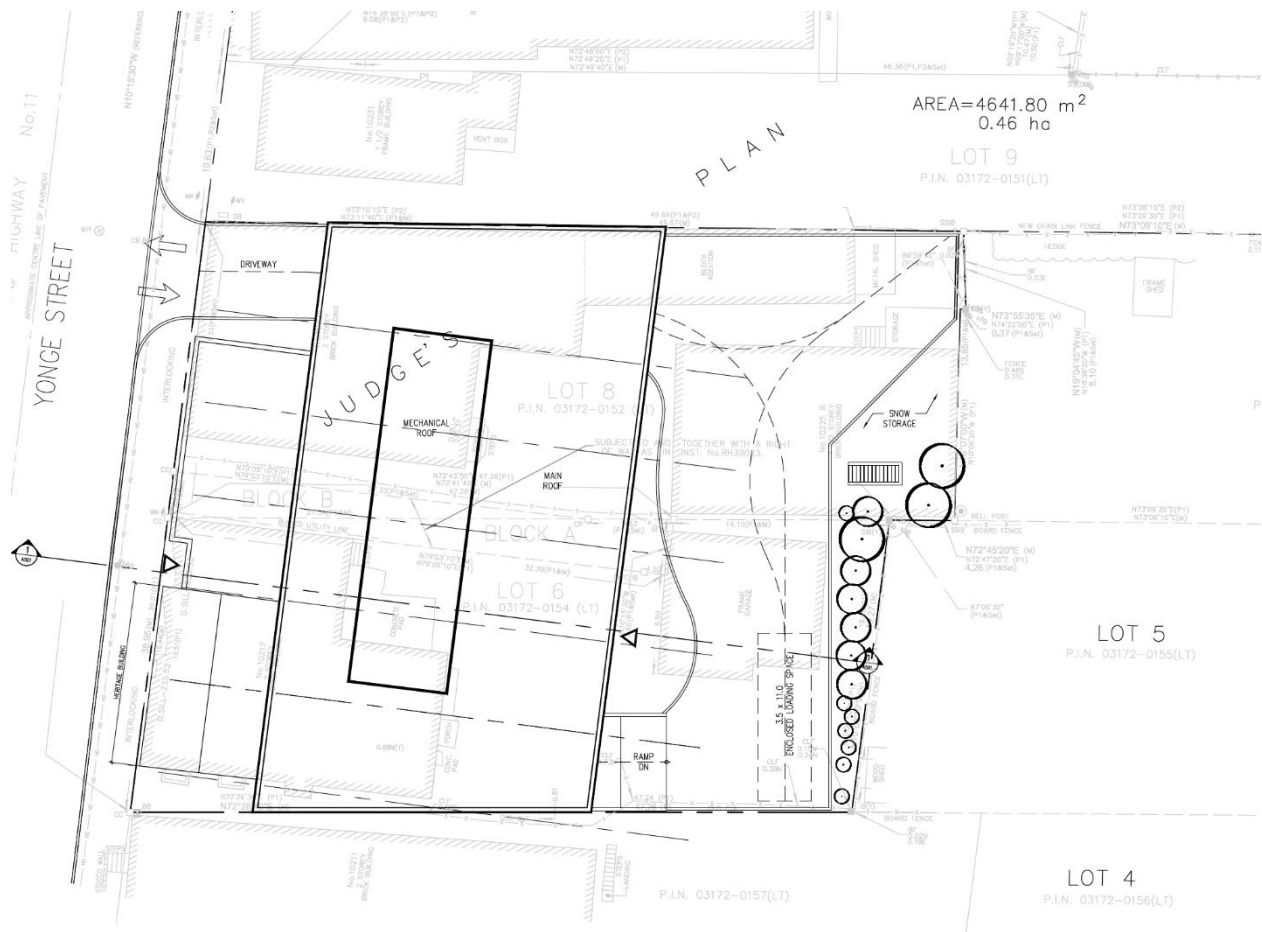
The zoning designation limits for this property are unclear.

10217-10225 Yonge Street

Over 10 years ago the owner proposed a mid-rise building for the site (located on the east side of Yonge Street opposite Richmond Street) with approximately 80 units at a density of 3.57 FSI. This was rejected, based partially on a need to protect the “view of the church steeples” and a need to “maintain the historical streetscape of the Downtown”.

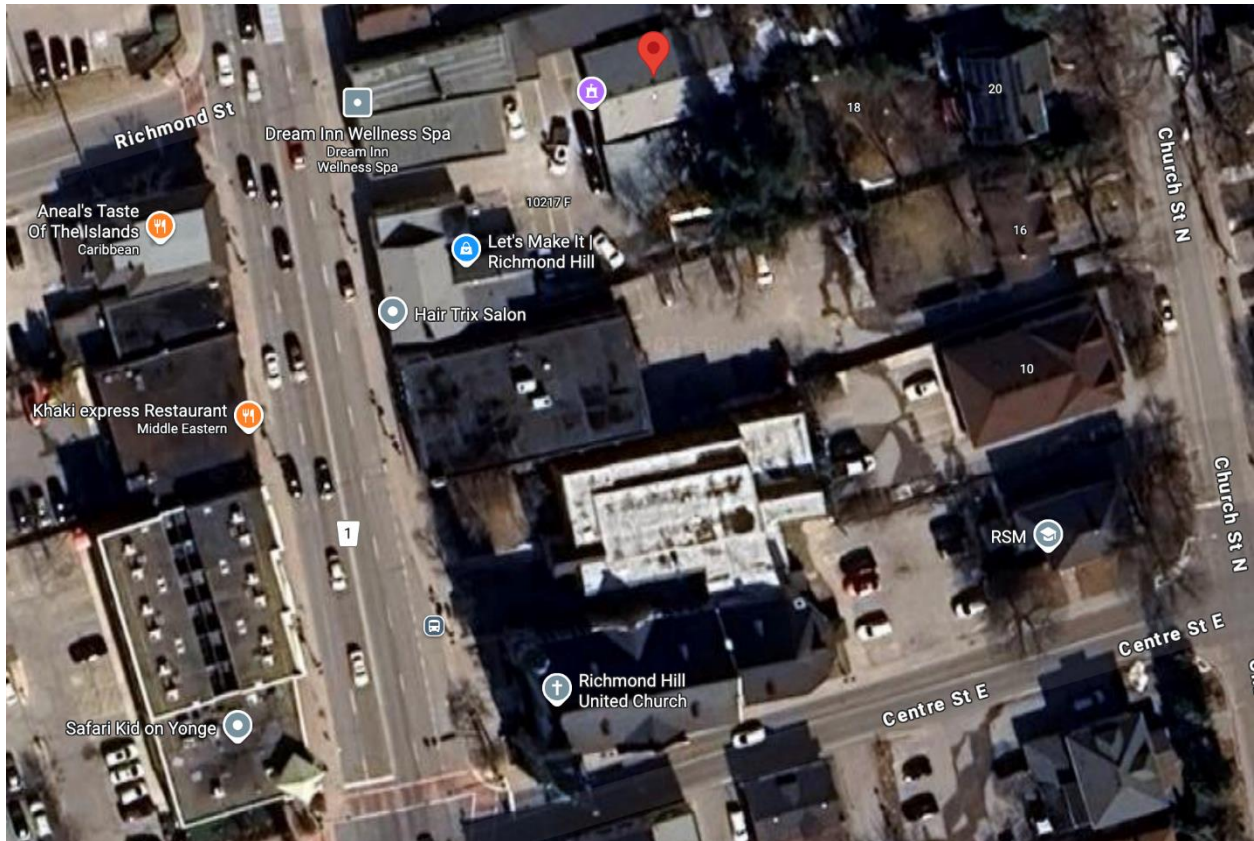
Although the maximum height permission on Schedule “C” appears to be 9 storeys, the proposed maximum density on Schedule “B” appears to be 2.0, this density is too low to allow for any economically feasible development to occur on the site.

Please confirm, that in fact, these are the applicable height and density for the property from the proposed new By-law.



The proposed zoning regulations serve only to sterilize the property and prevent meaningful development.

Please let us know how we can collaborate to correct these matters.



Please provide me with notice of any action taken by Council at the September 2, 2025 Public meeting in connection with the above matters.

Regards,

Michael Manett MCIP, RPP.

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