

Submission Number
D05.2009.002.2.013
Delegation at Statutory
Meeting

Date of Submission:
June 16, 2010

Submission Author:
Stephen Roberts

Comments or Requested Change to Proposed ROPA 2

Analysis and Recommendation**Delegation at Statutory Meeting**

- against the urban expansion proposed
- not enough study has been undertaken in regard to intensification and sustainability for Vaughan
- basic principle is that pedestrian based development is a model for sustainability
- urban expansion promotes growth based on automobiles
- need more compact development to save land
- wish to challenge the planning department and developers to do better than existing to be more innovative

Regional Official Plan adopted in December 2009 is based on a more compact form of development, with minimum 40% intensifications in existing developed areas with active transportation and transit as underpinnings.

York Region's municipal comprehensive review included the completion of forecasting and land budget work, a Regional Intensification Strategy, a comprehensive public consultation exercise throughout 2006 to 2009, infrastructure master plan updates for transportation, and water and wastewater and an updated Natural Heritage Strategy.

A thorough and detailed land budget report was made available in March, 2010. The Region's land budget is a key component of the regional municipal comprehensive review and Growth Plan conformity exercise. Detailed consultations were held with provincial staff on the land budget methodology and assumptions.

The land budget work included:

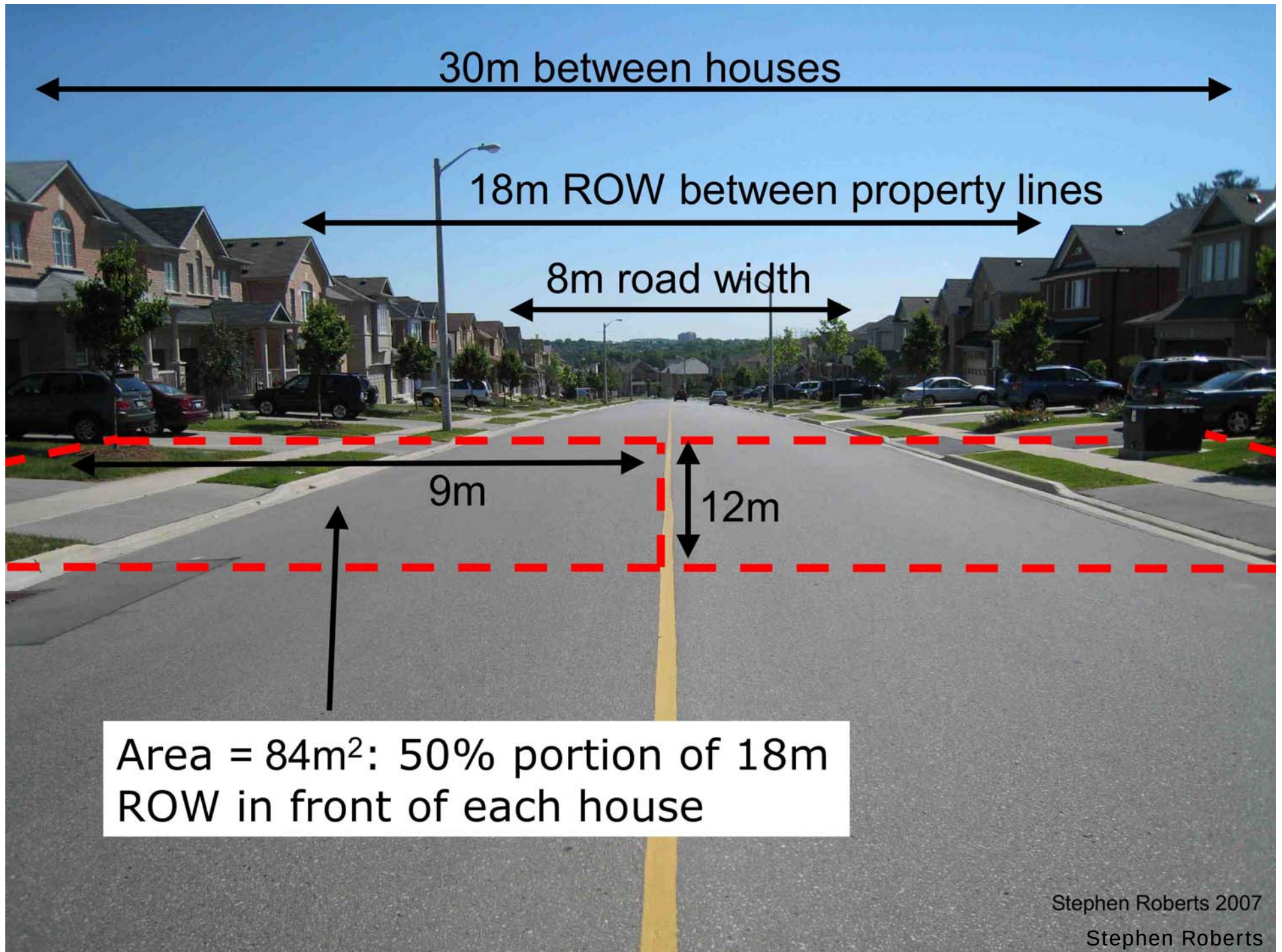
- The use of the Growth Plan's forecasts, densities and intensification for York Region.
- The completion of an intensification strategy that identifies a minimum 40% residential intensification target between 2015 to 2031, and plans for 88% of residential growth and 83% of

- employment growth to occur in existing Urban Areas.
- An assessment of the available residential and employment land supplies and demonstration of the need for a proposed urban expansion, and;
- A demonstration of how the minimum designated greenfield area density target of 50 people and jobs per hectare is to be achieved.

A portion of the Whitebelt is required to accommodate the York Region's forecast growth. The Regional Official Plan and the urban area expansion. Amendments ROPA's 1,2,3 implement the results of the regional municipal comprehensive review.

Pedestrian-based urban growth
as a strategy to promote sustainability
in York Region

Stephen Roberts



Standard Residential Roads are Too Wide



Stephen Roberts 2007

Stephen Roberts



Stephen Roberts





Stephen Roberts 2007

Submission Number
D05.2009.001.3.001
D05.2009.002.3.001
D05.2009.003.3.002

Date of Submission:
June 8, 2010

Submission Author:
Region of Peel

**Comments or Requested Change to Proposed ROPAs 1, 2
and 3**

Analysis and Recommendation

No comments on proposed ROPAs 1, 2 or 3

No comment necessary

Received June 8, 2010

D05.2009.002.3.001

From: Gurusinghe, Basil [Basil.Gurusinghe@peelregion.ca]

Sent: June 8, 2010 11:41 AM

To: Jeffrey, Barb

Cc: Warren, Andrea

Subject: Proposed Amendments 1, 2 and 3 to the Official Plan for York Region.

Thank you for circulating the subject amendments to the Official Plan for York Region to us.

We have reviewed them and would like to inform you that we have no comments to offer.

Basil Gurusinghe
Principal Planner
Development Planning Division
Public Works
Region of Peel

Submission Number
D05.2009.001.3.002
D05.2009.002.3.002
D05.2009.003.3.003

Date of Submission:
June 14, 2010

Submission Author:
Chippewas of RAMA First Nation

**Comments or Requested Change to Proposed ROPA 1, 2
and 3**

Analysis and Recommendation

As a member of the Williams Treaties First Nations, Rama First Nation acknowledges receipt of your letter of May 13, 2010, which was received on May 19, 2010.

Letter confirms receipt of our communications.

A copy of your letter has been forwarded to Karry Sandy-McKenzie, Barrister & Solicitor, Coordinator for Williams Treaties First Nations for further review and response directly to you.

Regional staff met with First Nations representatives on August 26th, 2010 regarding Regional Official Plan Amendment 1. York Region will continue to engage with First Nations communities.



Chippewas of RAMA
First Nation

A Proud Progressive First Nation Community

Received June 14, 2010

D05.2009.002.3.002

5884 Rama Road, Suite 200

Rama, Ontario L0K 1T0

T 705.325.3611 F 705.325.0879

June 2, 2010

York Region
Planning and Development Services
17250 Yonge Street
Newmarket, ON L3Y 6Z1

Attention: John B. Waller, Director Long Range and Strategic Planning Branch

Re: Proposed Regional Official Plan Amendments 1, 2 and 3

Dear Mr. Waller:

As a member of the Williams Treaties First Nations, Rama First Nation acknowledges receipt of your letter of May 13, 2010, which was received on May 19, 2010.

A copy of your letter has been forwarded to Karry Sandy-McKenzie, Barrister & Solicitor, Coordinator for Williams Treaties First Nations for further review and response directly to you. Ms. Sandy's address is 8 Creswick Court, Barrie, ON L4M 2J7 and her telephone number is (705) 792-5087.

We appreciate your taking the time to share this important information with us.

Sincerely,

Chief Sharon Stinson Henry

c: Council, Rama First Nation
Jeff Hewitt, General Counsel
Karry Sandy-McKenzie, Coordinator Williams Treaties Nations
Chief Rodney Monague Jr., Portfolio Chief for Williams Treaties Nations

SSH/sw

Proposed ROPA 1 East Gwillimbury Urban Expansion to Adopted ROP 2009 - Submission Analysis
Proposed ROPA 2 Vaughan Urban Expansion to Adopted ROP 2009 - Submission Analysis
Proposed ROPA 3 Markham Urban Expansion to Adopted ROP 2009 - Submission Analysis

1

September 2, 2010

Submission Number
D05.2009. 001.3.004
D05.2009.002.3.003
D05.2009.003.3.004

Date of Submission:
June 16, 2010

Submission Author:
David Donnelly, Donnelly law on behalf of the Huron
Wendat Nation

**Comments or Requested Change to Proposed ROPAs 1, 2
and 3**

Analysis and Recommendation

Writing in response to the Email notification of ROPA's 1, 2 and 3 and the statutory meeting of June 16, 2010.

Reminding York Region of its duty to consult and accommodate the Huron-Wendat Nation and other First Nations concerning matters of cultural heritage.

The reports regarding Amendments 1, 2 and 3 - posted online in preparation for the June 16, 2010 statutory meeting - contain no references to Huron-Wendat cultural heritage in the area, nor do they set out any framework for consultation or accommodation. This is in direct contrast to the cultural heritage policies outlined in section 3.4 of the Regional Official Plan adopted by Council on December 16, 2009 which state, among other things, that it is the policy of Council to "require local municipalities to adopt official plan policies to conserve significant cultural heritage resources."

The Amendments deal with expansions of the Urban Area. The Policy framework and the detailed policies that will apply to the development of lands within these amendments areas are contained in the Regional Official Plan that was approved by the Minister of Municipal Affairs. The Region's revised land budget has been available on the Region's website since March 2010. The Region's website contains over 50 background reports to the official plan. In addition the June 2009 Draft of the Official Plan indicated the location of potential urban expansions areas by asterisks.

Local official plans, which are being prepared at this time are being circulated in advance of the offer to meet with First Nations. Regional Amendments 1, 2 and 3 were circulated in late May and then again in July in advance of a meeting with First Nations on August 26, 2010 held to review the amendments. The Huron Wendat were invited to this meeting but did not send either a First Nations representative or their legal representative Mr. Donnelly. Mr. Donnelly has been contacted by Regional staff to discuss his issues.

September 2, 2010

The Regional Official Plan is deficient in many respects regarding the consultation and accommodation of Huron-Wendat cultural heritage interests. However, it is strange to note that even those policies contained within the Regional Official Plan that are geared towards recognition and protection of Huron- Wendat cultural heritage assets and consultation of the Huron-Wendat Nation, do not seem to have been implemented in Amendments 1, 2 and 3 themselves.

The Huron-Wendat Nation has lost thousands of cultural heritage sites to development over the past several decades. Regulations under the Planning Act, R.S.O. 1990, c. P. 13 (the "Planning Act") do not require notification of First Nations before a planning decision is made by a municipal council or the Minister, unless the development site is located within one kilometre of a Reserve.

We request that York Region fully recognize its duty to consult and accommodate the Huron-Wendat Nation with respect to its cultural heritage interest in the York Region by informing the Huron-Wendat Nation of all cultural heritage assets that are put at risk through the urban expansion schemes put forward by Amendments 1, 2 and 3, and by ensuring that these assets are protected through consultation with the Huron-Wendat Nation for the implementation of effective protection and/or management plans.

Development of lands in Amendments 1, 2 and 3 are subject to the policies of the Region of York Official Plan. These policies recognize the rich cultural history of the Region including the presence of Huron Wendat as well as other First Nations and the Métis Nation.

The Planning Act provides for First Nations with Reserves within 1 kilometre of an application to be notified. Following on the work undertaken for infrastructure planning, recognizing the wider and significant impacts associated with the Regional Official Plan, Regional Planning staff has followed a far more rigorous and wider notification, engagement and consultation process for the Official Plan and for local official plans where the Region is the approval authority.

The Region has undertaken consultation and discussions with First Nations in the course of the development and approval of the ROP that exceeds the *Planning Act* requirements. The Region will continue to consult with First Nations.

The Huron Wendat did not attend the meeting to discuss Regional Amendment 1, 2 and 3 on August 26, 2010, however Regional staff has contacted Mr. Donnelly to discuss the issues he has raised. In addition the Region is preparing to issue a request for Proposal to undertake an Archaeological Management Plan for the Region to be carried out in 2010 and 2011. The consultant will undertake consultation on the Terms of Reference as well as ongoing consultation as part of the Steering Committee for this study. First Nations at the meeting held on

Proposed ROPA 1 East Gwillimbury Urban Expansion to Adopted ROP 2009 - Submission Analysis
Proposed ROPA 2 Vaughan Urban Expansion to Adopted ROP 2009 - Submission Analysis
Proposed ROPA 3 Markham Urban Expansion to Adopted ROP 2009 - Submission Analysis

3

September 2, 2010

August 26, 2010, requested First Nations presence on the consultant selection panel and in crafting the Terms of Reference.

Mr. Donnelly has been contacted in regard to his clients' issues.

However, York Region has been slow to recognize its duty to consult and accommodate the Huron-Wendat Nation regarding their cultural heritage. We look forward to discussing these issues with you and beginning the process of meaningful consultation.



David R. Donnelly, MES LLB
david@donnellylaw.ca

June 16, 2010

Ms. Barbara Jeffrey, MCIP, RPP
Manager, Land Use Policy and Environment
Long Range and Strategic Planning
17250 Yonge Street,
Newmarket, ON L3Y 6Z1

Dear Ms. Jeffrey,

**Re: York Region Proposed Regional Official Plan Amendments 1, 2 and 3
Huron-Wendat Nation Consultation**

We act for the Huron-Wendat Nation in all matters pertaining to their cultural heritage in Ontario. I am writing to you in response to your June 10, 2010 e-mail regarding York Region's Official Plan, proposed Amendments 1, 2 and 3 to this Plan, and the June 16, 2010 statutory meeting in which they will be discussed.

As York Region contemplates amendments to its Official Plan that would authorize the urban expansion of the Town of East Gwillimbury, the City of Vaughan, and the Town of Markham, I would like to remind you of York Region's duty to consult and accommodate the Huron-Wendat Nation and other First Nations concerning matters of cultural heritage. The Huron-Wendat Nation has a constitutional right to be consulted and accommodated with respect to its cultural heritage interests. These rights have been recognized in the successful prosecution of the Ontario Realty Corporation in *R. v. Ontario Realty Corporation* (17 May 2004), Toronto (Ont. Ct. Jus.) and in *Hiawatha First Nation v. Ontario (Minister of Environment)*, [2007] 2 C.N.L.R. 186. As the Supreme Court of Canada stated in *Mikisew Cree First Nation v. Canada (Minister of Canadian Heritage)*, [2005] 3 S.C.R. 388 [Para. 54] "[c]onsultation that excludes from the outset any form of accommodation would be meaningless."

The reports regarding Amendments 1, 2 and 3 - posted online in preparation for the June 16, 2010 statutory meeting - contain no references to Huron-Wendat cultural heritage in the area, nor do they set out any framework for consultation or accommodation. This is in direct contrast to the cultural heritage policies outlined in section 3.4 of the Regional Official Plan adopted by Council on December 16, 2009 which state, among other things, that it is the policy of Council to "require local municipalities to adopt official plan policies to conserve significant *cultural heritage resources*." Policies 10 and 11 laid out in s. 3.4 state that it is the policy of Council:

10. To prepare, in partnership with First Nations, the Métis Nation, and other stakeholders a York Region Archaeological Resources Management Plan which considers:
 - a. the locations of significant or potentially significant archaeological resources, cultural heritage sites, ceremonial sites and sacred sites; and,
 - b. protocols for the protection and management of significant or potentially significant archaeological resources, cultural heritage sites, ceremonial sites and sacred sites.
11. That prior to approval of development or site alteration on lands containing significant or potentially significant archaeological resources, a plan for the protection and/or management of these resources will be developed, in co-operation with the local municipality and the Region, in accordance with provincial legislation and guidelines. If the archaeological resources pertain to First Nations and/or Métis Nation heritage, the protection and/or management plan will be developed in consultation with appropriate First Nations and Métis Nation communities. In situations where archaeological resources are to be preserved on site, the Region in consultation with local municipalities shall consider regulatory tools such as zoning restrictions and heritage easements.

The Huron-Wendat Nation cannot endorse the Regional Official Plan as adopted by Council on December 16, 2009, as it does not require the suspension of all Stage 3 and 4 archaeological licences issued without notification and consultation of the Huron-Wendat Nation or adopt the ossuary model for all authorized archaeological procedures.

The Regional Official Plan is deficient in many respects regarding the consultation and accommodation of Huron-Wendat cultural heritage interests. However, it is strange to note that even those policies contained within the Regional Official Plan that are geared towards recognition and protection of Huron-Wendat cultural heritage assets and consultation of the Huron-Wendat Nation, do not seem to have been implemented in Amendments 1, 2 and 3 themselves.

The Huron-Wendat Nation has lost thousands of cultural heritage sites to development over the past several decades. Millions and millions of artifacts, some of profound religious and historical value, have been scattered across private collections, warehoused improperly, abandoned and in a few notorious cases, thrown in the garbage.

Regulations under the *Planning Act*, R.S.O. 1990, c. P. 13 (the “*Planning Act*”) do not require notification of First Nations before a planning decision is made by a municipal council or the Minister, unless the development site is located within one kilometre of a reserve. The Huron-Wendat reserve is located outside Ontario. This means that the Huron-Wendat Nation has never and will never receive notice that sites of cultural significance to the Huron-Wendat Nation are scheduled for development or destruction. This violates the Huron-Wendat Nation’s constitutional right to be consulted and accommodated with respect to its cultural heritage interests.

It is shocking to us that regulations governing all aspects of the planning process such as consent applications (O. Reg. 197/96), plans of subdivision (O. Reg. 544/06), zoning by-laws (O. Reg. 545/06) and official plans (O. Reg. 543/06) all limit notification of First Nations to those First Nations living within one

kilometre of a reserve. In fact, these regulations put the rights of municipalities, ratepayers, school boards, conservation authorities, utilities, and in the case of O. Reg. 544/06, telecommunications infrastructure providers before the constitutionally entrenched rights of First Nations.

We request that York Region fully recognize its duty to consult and accommodate the Huron-Wendat Nation with respect to its cultural heritage interest in the York Region by informing the Huron-Wendat Nation of all cultural heritage assets that are put at risk through the urban expansion schemes put forward by Amendments 1, 2 and 3, and by ensuring that these assets are protected through consultation with the Huron-Wendat Nation for the implementation of effective protection and/or management plans.

George Smitherman, former Minister of Energy and Infrastructure, has encouraged city officials to consult Aboriginal communities regarding land use planning issues (see Attachment 1: Letter from George Smitherman to Linda Jackson (26 March 2009)). However, York Region has been slow to recognize its duty to consult and accommodate the Huron-Wendat Nation regarding their cultural heritage. We look forward to discussing these issues with you and beginning the process of meaningful consultation.

Yours Truly,



David R. Donnelly

Attachment.

cc. L. Lainé
H. Bastien
K. Sioui
C. Strahl

Minister of Energy
and Infrastructure

Office of the Deputy Premier

4th Floor, Hearst Block
900 Bay Street
Toronto ON M7A 2E1
Tel.: 416-327-6758
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Ministre de l'Énergie
et de l'Infrastructure

Bureau du vice-premier ministre

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MEI1826MC-2009-2

MAR 26 2009

Her Worship Linda D. Jackson
Mayor, City of Vaughan
2141 Major Mackenzie Drive
Vaughan ON L6A 1T1

Dear Mayor ^{Linda} Jackson:

At the Places to Grow summit on November 5, 2008, I presented my vision for a greener, more competitive and prosperous future for the Greater Golden Horseshoe. I was also pleased to announce this government's interest in investing in public infrastructure and working together with those municipalities that share this vision to implement the Growth Plan for the Greater Golden Horseshoe.

The *Places to Grow Act*, 2005 requires a council or municipal planning authority to amend its official plan to conform to the policies in the Growth Plan within three years of it coming into effect. The deadline for this work is June 16, 2009.

I recognize that lower-tier municipalities require certain planning work to be done by upper-tier municipalities before they can complete their own conformity amendments. Therefore, in certain circumstances, I am willing to consider an extension for lower-tier municipalities to bring official plans into conformity. In order to be considered for an extension of no more than one year, please provide a letter outlining the status of your conformity process, the reason for the required extension, how much time is needed to finalize conformity work and a brief work plan detailing the steps required to achieve conformity.

In the mean time, however, there is significant work that lower-tier municipalities can continue with in preparation for official plan amendments related to conformity, including an analysis of intensification opportunities and development of local policies to achieve complete, well-designed, transit-supportive and pedestrian-oriented communities.

In carrying out this Growth Plan conformity work, I strongly encourage you to engage those Aboriginal communities who have an interest in land use planning in your community, to ensure they have an opportunity to participate in this process.

If you have any questions regarding my announcement or the process and expectations for conforming to the Growth Plan, please feel free to contact Brad Graham, Assistant Deputy Minister for the Ontario Growth Secretariat, at 416-325-5803 or 1-866-479-9781.

Sincerely,

A handwritten signature in black ink, appearing to read "George Smitherman".
George Smitherman
Deputy Premier, Minister

September 2, 2010

Submission Number
D05.2009.002.3.004
D05.2009.003.3.005

Date of Submission:
August 3, 2010

Submission Author:
Toronto and Region Conservation Authority

**Comments or Requested Change to Proposed ROPA 2 and
3**

Analysis and Recommendation

Amendments comprise mapping changes and no new policy text to incorporate white belt lands into the urban boundary.

Acknowledge ongoing discussion over the past several years between TRCA staff and Regional staff regarding the results of the Humber, Don and Rouge watershed plans and how they should influence the extent and type of development that will take place in newly developing area in the upper reaches of the watersheds.

Pleased to see that the lands to be urbanized are less than what was suggested in earlier discussions. Also commend York for its newly adopted ROP that sets out the requirements for how development will be undertaken in New Communities. Similarly please to see leading edge policies on how redevelopment and intensification occurs

While policies are supportive, key to achieving sustainability and managing flood and erosion hazards will be on-ground implementation through the municipally lead planning process.

There may be a need to for new storm water quantity control in the Humber and Rouge watersheds

Regional staff agrees that implementation activities must reflect the policy framework.

September 2, 2010

Humber Watershed Plan indicates that hydrologic impact of development beyond the current urban boundaries must be examined on a watershed scale to determine appropriate storm water management criteria. TRCA continues to stress the importance of updating the hydrological study prior to development of white belt lands

TRCA also developing revised storm water management criteria for runoff volume reduction to mitigate erosion from increased volumes

Therefore need to include TRCA expertise early in the local planning process.

Notwithstanding this development in the white belt will significantly alter the hydrologic cycles and add to the impacts in downstream areas. Upper and Lower tier municipalities should consider the establishment of a development charges fund or alternative funding mechanism for the remediation of likely downstream erosions impacts to watercourses, infrastructure and communities.

Agreement has been reached with TRCA and member municipalities to update the hydrologic models for the Humber (2010 to 2011) and Rouge 2011 to 2012) to evaluate effects of flooding on downstream flood vulnerable areas and to confirm level of storm water control required before urban development takes place in the upstream areas subject to ROPA 2 and 3.

Both Regional and Local municipal official plans reflect the importance of early consultation with conservation authorities.

Regional staff from Finance and Planning has reviewed this suggestion and note that to be considered under Development Charges, regional policy would be required and remediation efforts would need to be identified as regional projects. Alternatively, the Region could become a funding partner with projects being considered as part of future Conservation Authority budgets requests. Regional staff will continue discussions with TRCA staff in this regard.

TORONTO AND REGION
Conservation
for The Living City

July 29, 2010

CFN 42103.01

Mr. John B. Waller, MCIP, RPP
Director, Long Range and Strategic Planning Branch
Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Dear Mr. Waller:

RE: York Region Official Plan Amendments 2 & 3

Thank you for the opportunity to comment on the subject amendments which contain no new policy text, but are comprised of mapping changes to incorporate new "whitebelt" lands within the urban boundary in the City of Vaughan and Town of Markham.

We acknowledge the ongoing discussions over the past several years between Regional planning staff and TRCA staff regarding the results of the Humber, Don and Rouge River watershed plans and how they should influence the extent and type of development that will take place in newly urbanizing whitebelt lands in the upper reaches of these watersheds. We are pleased to see that the amount of new lands being proposed for inclusion within the urban boundary is less than what had been suggested during earlier discussions. We also commend York for its newly adopted official plan, and the extensive consultation with TRCA staff, that sets out the requirements for how development will be undertaken in these New Community Areas. In particular we note the policy requirements for:

- Comprehensive secondary plans prepared by multi-disciplinary teams in order to ensure an integrated and sustainable approach to the planning and design of the lands;
- Density that exceeds provincial Growth Plan targets;
- Preparation of Community Energy Plans to reduce energy demand, optimize passive solar gains, and make use of renewable, on-site generation and district energy options;
- Preparation of Master Environmental Servicing Plans (MESP's) to examine all water systems in a comprehensive and integrated manner to minimize stormwater volume and contaminant loads, protect sensitive groundwater areas, and maximize infiltration through an integrated treatment (train) approach, including (at-source controls and) techniques such as rainwater harvesting, constructed wetlands, bio-retention swales, green roofs, permeable surfaces, clean water collection systems, and the preservation and enhancement of native vegetation cover; and
- Preparation of a Regional Greenlands System Plan that, among other things, identifies hazard lands and hazardous sites and incorporates them into the Greenlands System, and identifies strategic areas for enhancement and restoration to maximize the quality of the entire Greenlands System.

Similarly, we are pleased to see some leading edge policies in the YROP outlining how re-development and intensification in existing urban areas will be planned, such as:

- Promotion of and requirements for sustainable buildings in terms of being more energy and water efficient, supporting local industry by buying materials locally, and providing healthier indoor environments;
- Planning for intensification areas to avoid special policy areas unless no other alternatives exist outside of the floodplain;
- Requiring comprehensive secondary plans for Regional Centres and key development areas along Regional Corridors to be prepared by local municipalities to include policies:
 - to ensure natural and recreational connections and enhancements to and within local and Regional Greenlands Systems;
 - to require innovative approaches to urban stormwater management, including alternatives to conventional retention ponds such as low-impact development, green roofs, and water capture and reuse.

While the policy regime at the Regional level is very supportive, the key to truly achieving sustainable communities and managing for flooding and erosion hazards will be the on-the-ground implementation of the policies through the local municipality-led planning process. As we previously stated in our letter of September 25, 2009, there may be a need for new stormwater quantity control requirements for the Humber River Watershed in Vaughan and Rouge River Watershed in Markham, potentially including the need to detain and control storm flows up to and including the Regional Storm. The hydrologic modeling completed as part of the updated Humber and Rouge River Watershed Plans indicated the potential for significant changes to the flood flows downstream, including substantial increases to Regional Event flows that would increase flood levels and expand flood lines in downstream areas. The updated Plans concluded that development in the watershed beyond areas designated for urban development in municipal official plans (based on 2005 urban boundaries) could increase flood flows and flood risk downstream.

The Humber Watershed Plan indicates that the hydrologic impact of development beyond the current urban boundaries must be examined on a watershed scale in order to determine appropriate stormwater management criteria for new development to prevent downstream impacts. These criteria may be significantly different from those currently applied according to the 2002 Humber River hydrology update. Accordingly, the TRCA continues to stress the importance of undertaking the updated hydrologic study prior to the development of "whitebelt" designated lands within the Humber River Watershed. This is necessary so that appropriate stormwater management criteria can be identified to mitigate the cumulative impacts the build-out of these areas could have on downstream regional flood levels in existing flood vulnerable communities. This issue also applies in the Rouge River watershed based on the amendment to expand urban boundaries in Markham, and resulting potential impacts on downstream intensification areas.

We acknowledge that our partner municipalities have agreed to fund and complete the updated hydrologic studies as soon as possible (Humber in 2010-2011; Rouge in 2011-2012), to evaluate the effects of flooding on downstream flood-vulnerable areas from proposed new developments and to confirm the level of stormwater control needed before any urban development occurs in the lands subject to ROPA 2 and 3 in the Humber and Rouge River Watersheds.

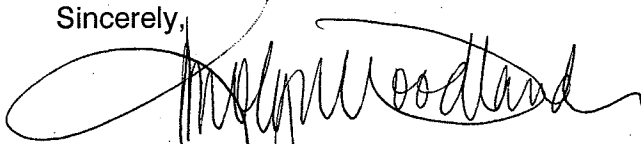
In addition, the Humber River, Don River and Rouge River watershed plans have identified the potential for significant erosion concerns, which could lead to the undermining of downstream infrastructure and impacts to aquatic habitat, from "business as usual" development in the whitebelt lands or redevelopment in the existing urban area. The TRCA is developing revised stormwater management criteria for runoff volume reduction to further mitigate these impacts, which aligns with the Region's objectives to minimize stormwater volumes as noted above.

To ensure that the new water management concepts for flood and erosion control are effectively incorporated into new developments, it will be critically important to incorporate TRCA's expertise early in the local planning processes. This means that TRCA needs to be involved in the development of the terms of reference for the Master Environmental Servicing Plans (MESPs) in order to properly fulfill our delegated responsibility for water and natural hazards management. The MESPs will need to address the findings of the updated hydrologic studies to inform water management techniques to achieve volume reduction through lot level practices. It has been our experience in the past that some plans of subdivision have been approved prior to or without the benefit of a completed MESP. We will rely on the YROP policies to ensure that future planning for these (ROPA 2 & 3) lands follows the appropriate order and process to ensure that water management and natural hazards are properly addressed for long term community and environmental sustainability.

Notwithstanding efforts to minimize stormwater volumes and mitigate flooding impacts, ongoing development in the whitebelt lands will significantly alter the hydrologic cycle in these areas and add to the impacts of existing development on erosion in downstream watercourses. We suggest that municipalities, both upper and lower tier, should consider the establishment of a development charges fund or alternative funding mechanism for the remediation of likely downstream erosion impacts to watercourses, infrastructure and communities. (Town of Markham, for example, has already put this initiative in place.)

Thank you for the opportunity to provide comments on ROPA 2 and 3. We look forward to our continuing involvement through the ongoing studies and planning for these lands. Should you require any clarification, please contact me at 416-661-6600, ext. 5214.

Sincerely,



Carolyn Woodland, OALA, FCSLA, MCIP, RPP
Director, Planning and Development
Ext. 5214

GDB/

cc: by email

B. Denney, D. Martin Downs, A. Freeman, L. Nelson, D. Lewis, B. Kiru, Q. Hanchard,
S. Meek, B. Williston, G. Wilkins, R. Ness, D. Burnett - TRCA
John Zippay, Commissioner of Planning - City of Vaughan
Jim Baird, Director of Planning - Town of Markham

Submission Number
D05.2009.001.3.006
D05.2009.002.3.005
D05.2009.003.3.006

Date of Submission:
August 24, 2010

Submission Author:
York Region District School Board

**Comments or Requested Change to Proposed ROPA 1, 2
and 3**

Analysis and Recommendation

Thank you for your correspondence regarding the Proposed Amendments 1, 2, 3 to the Official Plan for the Municipality of York. We have no comments at this time but would like to continue to be included in future correspondence. We will be bringing an information report to our trustees in September on the proposed Official Plan Amendments.

Letter confirms receipt of our communications.

York Region will continue to keep the York Region District School Board informed about the status of Proposed Regional Official Plan Amendments 1, 2 and 3.

Received August 24, 2010

D05.2009.002.3.005

From: Luk, Gilbert [mailto:gilbert.luk@yrdsb.edu.on.ca]
Sent: Tuesday, August 24, 2010 3:57 PM
To: Elliott, Trish
Subject: Proposed Amendments to York Region Official Plan

Hello Trish,

Thank you for your correspondence regarding the Proposed Amendments 1, 2, 3 to the Official Plan for the Regional Municipality of York. We have no comments at this time but would like to continue to be included in future correspondence. We will be bringing an information report to our trustees in September on the proposed Official Plan Amendments.

Regards,

Gilbert Luk

Planner – Planning & Property Development Services
York Region District School Board
60 Wellington St. West, Aurora, ON, L4G 3H2
Tel: (905) 727-0022 ext 2439| Fax: (905) 727-0775
Email: gilbert.luk@yrdsb.edu.on.ca