



July 11, 2021

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**Re: Draft Plan of Subdivision, Official Plan Amendment and Zoning Bylaw  
Amendment Applications  
Fountain Street South and Menno Street, Breslau, Township of Woolwich  
30T-20701, OPA 1/2020, and ZCA 3/2020  
Breslau Properties and 805232 Ontario Limited**

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Dear Mr. Wellwood and Mr. Vink,

Following our comments dated July 9, 2020, the Grand River Conservation Authority (GRCA) is in receipt of a resubmission for the above-noted applications. We have reviewed the following documents:

- Planning Justification Report (Polocorp, December 2019);
  - Addendum (Polocorp, February 2021)
- Functional Servicing Report (IBI Group, January 2021);
- Stormwater Management Report (IBI Group, January 2021);
- Geotechnical Report (Chung & Vander Doelen, September 2019);
- Hydrogeological Investigation (Chung & Vander Doelen, December 2019);
  - Addendum (Chung & Vander Doelen, January 2021)
- Environmental Impact Study (Dougan & Associates, December 2019);
  - Addendum (Dougan & Associates, March 2021)
- Plan of Subdivision (Polocorp, revised February 8, 2021).

At this time, we recommend deferring draft plan approval of the subdivision. Please see our comments below.

1. We raised that the East Side Lands Stage 2 Master Drainage Plan have not been finalized in previous comments, and as such, there is no Regulatory Floodplain Elevation (RFE) approved by the GRCA to date. The applicant has used a provisional RFE, and has indicated that grading of the Ottawa Street corridor and lands to the north will be confirmed once the RFE has been confirmed.

We have reviewed additional information from the Master Drainage Plan, and have enough confidence at this stage to provide RFEs for additional analysis. These will be provided under separate cover. We request the applicant to prepare a preliminary floodplain analysis memo, confirming:

- The Ottawa Street Extension and proposed blocks in Phases W-1 and W-2 can be graded above the RFE so that they are not impacted by a flooding hazard;
- RFEs will not be impacted by the above-noted grading, as well as any grading and discharge from stormwater management facilities.

The pre- and post-development should be illustrated on all plans. Please include the vertical datum reference on all topographic surveys, and continue including notes that the RFE is not finalized. A hydraulic model will be requested to verify the impacts noted above during detailed design.

2. Further to this, we provided updated comments on the Ottawa Street Extension Integrated Class Environmental Assessment (Class EA) in a letter dated November 11, 2020, however the applicant's tabulated responses to all Region / Township / agency comments only addressed our previous dated January 17, 2020. Per comment 2 in our November letter, Class EA Public Information Centre 2 materials indicate that floodplain impacts would occur, but that the floodplain hydraulic function will not be impacted. We ask that these potential impacts are clarified.
3. With grading details from the Class EA and Drain Improvements finalized, we request that the applicant revise the stormwater management (SWM) report accordingly. The revised report must also include:
  - a. Preliminary design drawings of all SWM facilities, including the location and size of the facility proposed in Block 53;
  - b. SWM outlet locations and configurations;
  - c. Post-development water budget calculations and monthly water balance for each catchment;
  - d. Confirmation that the increased duration of flows will not exceed current erosion thresholds of Breslau Drain downstream of the SWM outlets.

### **Advisory Comments**

4. This subdivision and the Ottawa Street Extension propose enclosing a segment of a Breslau Drain, and establishing a new outlet into the PSW. This differs from the preferred alternative presented in the Preliminary Report for Breslau Drain 1

(K. Smart Associates, November 25, 2019). We would appreciate clarification from the Township on whether this will be considered works under the Drainage Act, Environmental Assessment Act, or Plan of Subdivision process.

5. Legal outlet should also be confirmed.
6. The Ministry of Natural Resources and Forestry will need to approve any proposed revisions to the PSW boundary mapping.
7. We note that fish habitat enhancement measures are pending further review by Fisheries and Oceans Canada. We request that these measures be forwarded to the GRCA when available.

We request that the applicant provides a comment-response matrix to address GRCA's comments above in subsequent submissions.

We trust this information is of assistance. If you have any questions or require additional information, please contact me at 519-621-2763 ext. 2292 or [theywood@grandriver.ca](mailto:theywood@grandriver.ca).

Sincerely,



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Trevor Heywood  
Resource Planner  
Grand River Conservation Authority

- c.c. Jane Gurney, Region of Waterloo  
Randy Miller, Township of Woolwich  
Paul Puopolo and Amanda Stellings, Polocorp  
Dave Barrett, IBI Group  
Todd Fell, Dougan and Associates