205 Elmwood Drive Pre-consultation Comment Response Table Plan of Subdivision Our File: 9137BK September 2025		
Town of Gananoque		
	Comments	
1	The natural features on the subject lands will require consideration and further discussion in relation to the PPS and wetlands, as discussed.	Please refer to Environmental Impact Assessment (EIA) and the Planning Justification Report.
2	Section 3.2 designates the lands as Residential which allows for a varied range of residential types. Additional policies for waterfront residential under apply Section 3.2.2.2. The Town is open to varied types of housing within a development from single family dwellings to apartments.	Noted. The proposed draft plan of subdivision includes single detached dwellings with consideration for future Additional Dwelling Units.
3	Section 3.6 specific addresses the protection of natural heritage features that are prevalent on this property. As per discussions this will require further reviewed with the PPS and wetlands. The property abuts the St. Lawrence River and the OP identifies the importance of shoreline protection as well as providing opportunity for public access. This area is identified as an area of fish spawning areas on Schedule F.	Noted. The Planning Justification Report includes analysis of the relevant Official Plan and the PPS.
4	Background reports are being requested to support the development of unstable slopes and floodplains as currently identified on the mapping. The current Official Plan identifies the unstable slope, floodplain lines as per Schedule G.	A Geotechnical Report has been included with this submission. The report includes slope stability analysis.
5	Section 4.0 provides that development shall be on municipal water and sewer infrastructure where services can be extended and provided there is appropriate capacity to do so. Road networks will function property. Stormwater management is required.	Noted. The proposed development is to be serviced through the extension of municipal water and sewer infrastructure. Stormwater management facilities are proposed. A Servicing Report and a Stormwater Management Report have been included with this submission.
6	Section 5.4 outlines the considerations of a plan of subdivision which is outlined above and in the requests for drawings and supporting studies.	Noted.

Cataraqui Conservation		
7	Cataraqui Conservation's main interests in the proposal are the avoidance of natural hazards through appropriate setbacks from surface water features present on and near the subject lands, protection of the function of coastal wetlands, provision of adequate stormwater controls and compliance with Ontario Regulation 41/24.	Noted.
	Surface Water Features / Natural Hazards	
8	Cataraqui Conservation, in accordance with the 2024 Provincial Planning Statement and through Ontario Regulation 41/24, directs development away from hazardous lands, such as areas subject to flooding and erosion. There are three focus areas as it relates to natural hazards on the subject property: the flooding hazard associated with the St. Lawrence River, the erosion hazard associated with steep sections of the shoreline bluff, and flooding and erosion risk associated with smaller watercourses on and near the subject lands.	Noted.
	<u>St. Lawrence River Shoreline</u>	
9	The current regulatory floodplain for this section of the St. Lawrence River has an elevation of 76.4 metres geodetic. This includes a 1:100 year level of 76.1 m GSC and a 0.3 m vertical factor for wave uprush. CRCA has updated St. Lawrence River flood plain mapping that will be implemented in 2025. The updated mapping found a 1:100 year flood level in this location and a 10 metre horizontal factor for wave uprush. It is appropriate to use the updated flood plain mapping in considering the feasibility of the proposed subdivision.	Based on the updated floodplain mapping (Zuzek Inc., 2024) the St. Lawrence floodplain elevation is 76.10 (IGLD'85) at this location, and a setback of 10m from the floodplain is recommended based on Table 4.25 of the floodplain Mapping study. Note that the floodplain mapping (Zuzek Inc. 2024) no longer utilizes vertical elevations for wave uprush and has instead adopted a horizontal setback from the 1:100-year floodplain.
10	When new lots are created, CRCA regulatory policies require that new development (buildings and structures) be set back a minimum of 15 metres from the flood plain. Development and site alteration is outright prohibited within the 1:100 year flood plain.	The 1:100 year floodplain and a 10 metre setback is illustrated on the draft plan of subdivision. Development is not proposed within the floodplain or the setback.
11	As currently proposed, Lots 23, 24, 44, 45, 48 and 49 do not appear to be feasible as they would not contain a sufficient development envelope outside 15 metres from the updated flood plain mapping (76.1 m + 10 m offset).	Figure 11 in the Planning Justification Report demonstrates the feasibility of development on lots adjacent to the St. Lawrence River, when considering the floodplain and the proposed15 metre setback.

12	Future concept plans should include the updated flood plain mapping and applicable setbacks to ensure proposed lots are feasible.	Noted. This is included as Figure 11 in the Planning Justification Report.
13	The extent of the erosion and slope stability hazard along the shoreline of the St. Lawrence River is dependent on the height and composition of the bluff in this location. For the most part, as previously noted, the Town's 30 metre high water mark setback is expected to be more restrictive than the erosion hazard extent, but this will need to be confirmed through a slope stability and erosion assessment by a qualified professional. Specifically, attention will need to be paid to the shoreline of Lots 52 to 57 to ensure these are developable outside the erosion extent and setbacks.	The slopes along the St. Lawrence River are generally flat in this area. An existing natural stone retaining wall is in place along the shore of the St. Lawrence River where the proposed lots are located. Refer to the Geotechnical Report by Malroz for details.
	<u>Watercourses</u>	
14	There is a west-east watercourse that flows from near Elizabeth Avenue into the wetland at the centre of the property and into the St. Lawrence River. There is also a smaller drainage feature that flows from the northeast south into the wetland and river at the rear of proposed lots 42 and 43.	Noted.
15	CRCA does not have engineering information that determines the extent of flooding and erosion hazards associated with these watercourses. These hazards are expected to be limited and would not impact the proposal as it relates to the north-south watercourse at the northeast. However, the west-east watercourse has a wide, low-lying valley and steep embankments on the western half of the property that need to be considered in determining developability.	A hydraulic and hydrologic analysis is completed in the Stormwater Management Report for the west-east watercourse to determine the extent of the high water level. Improvements are proposed to the banks of the watercourse and are discussed in the SWM Report. Refer to the Stormwater Management Report prepared by Forefront Engineering Inc.
16	Normally a 30 m generic setback is used by CRCA in situations where flood plain mapping is not available. We note a 15 m offset is shown on the concept plan. Greater setbacks may be required near the low-lying sections of the watercourse and adjacent to steep slopes. This is expected to impact the feasibility of lots 8, 9, 10 (contain low-lying lands) and lots 58-70 (steep slopes).	As noted above, a hydraulic and hydrologic analysis is completed in the Stormwater Management Report for the west-east watercourse to determine the extent of the high water level. Improvements are proposed to the banks of the watercourse to provide stable banks and are discussed in the SWM Report. A 6 m setback is proposed to the watercourse's 1:100 year high water level. Refer to the Stormwater Management Report and Floodplain Setback Memo prepared by Forefront Engineering Inc for further discussion.
17	Hydrologic and hydraulic analysis to determine flood risk would be needed in support of a reduction to setbacks from the watercourse. Geotechnical	Refer to the above response. A 6m setback from the proposed high water level.

	assessment is necessary to determine appropriate setbacks where there are steep slopes on the south side of the watercourse. Typically, a minimum 6 metre access allowance from the top of stable slope is applied to steep bedrock slopes (this expected to be the case for lots 58-70 but should be confirmed).	
18	Proposed watercourse crossings (e.g. Street 'A') will need to be supported by engineering analysis to demonstrate they will not impact flooding and erosion upstream and downstream.	A culvert crossing is proposed, and a hydraulic analysis is completed to ensure that the Street A crossing will not impact flooding and erosion upstream and downstream. Refer to the Stormwater Management Report.
	Coastal Wetland	
19	As discussed in the pre-consultation meeting, the wetlands present on and near the property would qualify as coastal wetlands as defined by the 2024 PPS. The PPS outright prohibits development and site alteration within significant coastal wetlands. Development and site alteration is also prohibited within all other coastal wetlands unless it can be demonstrated that there would be no negative impacts to wetland features and functions. As a first step, it is recommended that the proponent retain a qualified ecologist to determine if the wetlands present on the subject lands would be considered significant.	Tomlinson retained MNR-certified and experienced wetland evaluators (WSP) to conduct a wetland evaluation of the wetland on the property. The wetland did not score as significant, which is not surprising given its very small size and lack of diverse plant communities. The OWES evaluation is now finalized and will be submitted to the Town of Gananoque and the MNR for addition to their files.
20	Second, it is important to note that regardless of PPS policies, CRCA policies for implementing Ontario Regulation 41/24 prohibit development and site alteration within any wetland, regardless of significance if the wetland is greater than 0.5 hectares in size and/or hydrologically connected to another waterbody such as the St. Lawrence River. There are few exceptions to this policy, most of which relate to critical public infrastructure. CRCA staff do not support wetland compensation for residential development.	Section 28.1 of the Conservation Authorities Act allows the conservation authority to issue a permit to engage in activities otherwise prohibited if: "(a) *the activity is not likely to affect the control of flooding, erosion, dynamic beaches or unstable soil or bedrock;* *(b) the activity is not likely to create conditions or circumstances that, in the event of a natural hazard, might jeopardize the health or safety of persons or result in the damage or destruction of property; and* *(c) any other requirements that may be prescribed by the regulations are met. 2017, c. 23, Sched. 4, s. 25; 2022, c. 21, Sched. 2, s. 9 (1)."*

21	We recommend that the proponent focus on determining the precise extents of the wetlands on the property using approved OWES methodologies and that a clear delineation and assessment of the wetlands be provided to CRCA staff for review. This is important for determining the feasibility of many of the central lots – including lots 20-24, 25-31 and 35-37.	Tomlinson retained MNR-certified and experienced wetland evaluators (WSP) to delineate and the wetland on the property using OWES methodology. This information is provided within the EIA.
22	CRCA regulatory policies require a minimum 30 metre development setback from regulated wetlands. Reductions to this may be considered based on outcomes of ecological and hydrologic assessments and on the nature of the proposed development.	As noted in response 20, the *Conservation Authorities Act* allows for permitting of otherwise prohibited activities if specific hazard-related requirements are met. It is also important to note that nowhere in the *Conservation Authorities Act*, O.Reg 41/24, or Chapter 5 of the PPS is there any reference to ecological function. It is our understanding that there is no regulatory role of the CRCA to review and approve ecological assessments of hazards and the focus of a CRCA review should restricted to actual hazardous potential as intended by the Act (i.e. flooding, erosion, dynamic beaches or unstable soil or bedrock).
Stormwater Management		
23	On-site stormwater management to prevent downstream flooding and erosion are necessary for this location. CRCA recommends that pre-development peak flows are not exceeded by post-development flows for 2-year, 5-year and 100-year storm. We recommend a treatment train approach to SWM control including LID features and other lot-level controls.	The proposed stormwater strategy provides control of the 25 mm water-quality event and erosion/scour protection at the outlet using an enhanced swale with check-dams and an armored apron, consistent with MECP guidance and CLI-ECA requirements. As the site outlets directly to the St. Lawrence River (a large receiving water body) with no downstream conveyance constraints, matching post-to-pre peak flows offers no measurable flood-risk reduction to downstream systems, accordingly, post-to-pre quantity controls are not proposed. Details and calculations are provided in the Stormwater Management Report.
24	A preliminary stormwater management report is requested at the earliest planning approval stage (e.g. official plan/ zoning by-law amendment, if required). Otherwise, a comprehensive stormwater management report with full design details will be required at the site plan control stage, along with standard grading, drainage, and sediment and erosion control plans.	A stormwater management report is included with this application. Grading, drainage and erosion and sediment control plans will be prepared at the detailed design stage.
25	CRCA staff can provide our Guidelines for Stormwater Management and a list of qualified SWM consultants should the proponent require these.	Noted.
Ontario Regulation 41/24		

26	Cataraqui Conservation permit approval under O. Reg. 41/24 is required prior to any work (development and site alteration) within 15 metres of the regulatory flood plain of the St. Lawrence River, within 30 metres of the watercourses on and near the property and within 15 metres of the top of stable slope of the shoreline bluff and watercourse embankments on the subject lands. **CRCA must be consulted prior to undertaking any work in these areas.**	Noted.