

# IP Park Phase 2 - Fourth Submission

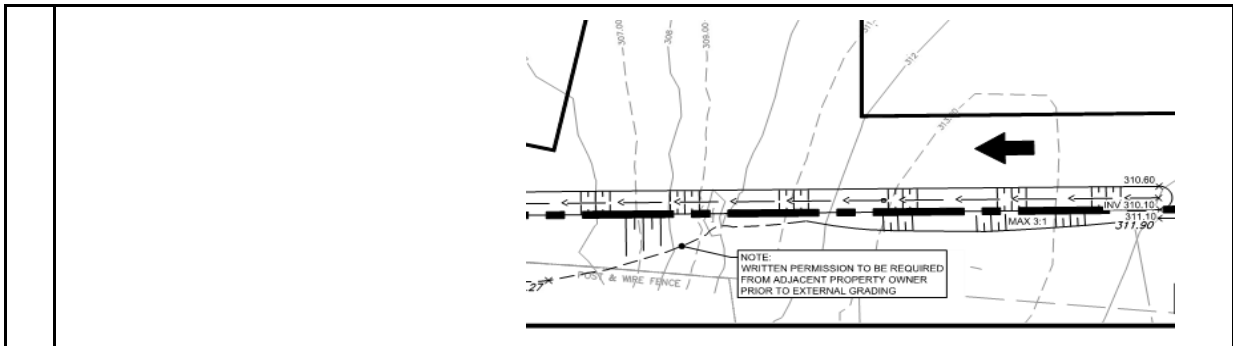
## (Response to 3rd Submission Comments)

Nov 5, 2020

#	Full Comment	Responses to 3rd Submission Agency Comments
<b>GRCA - Sept 22, 2020 Comments</b>		
<b>National Heritage Comments</b>		
1	Drawing SG-01 (Site Grading Plan) – the wetland boundary and 30 m setback are not clearly labelled on the upstream side of Intermarket Road. Please correct this.	EXP: labels have been updated.
2	Drawing ESC-01 (Phase 2 Erosion and Sediment Control Plan, Part 1) – the label for the surveyed wetland is upside down on the plan and the label for the 30 m setback is missing altogether. Please correct this.	EXP: labels have been updated.
3	Drawing SS-01 (Site Servicing) – the wetland boundary is highlighted in blue, but the legend should be formatted accordingly. The 30 m setback is labelled on the downstream side but not on the upstream side of Intermarket Road. Please correct this.	EXP: legend has been updated to match.setback has been labelled as well.
<b>City of Cambridge - Oct 19, 2020 Comments</b>		
<b>DEVELOPMENT PLANNING</b>		
1	<b>Parcel Sizes</b>	
	As with the previous submission, staff still do not support the 2 small parcels (Block 5 and 6) on the east side of Intermarket Road. As per previous comments, the City and Region can support one large lot and one small lot for Phase 2 East, understanding that one lot must meet the 20 acre (8 hectare) minimum (which Block 4 does at 8.094 hectares) and another lot made up of the remainder of Phase 2 East. We understand that combining Blocks 5 and 6 equals 3.38 hectares of land which does not reach the 8 hectares minimum, however this falls closer in line to ROP Policy 2.D.22 for large lots than having two small lots at 1.065 hectares and 2.315 hectares. Staff also do not see environmental constraints as a factor as to why Blocks 5 and 6 cannot be combined to create one block. Another option would be to combine Block 4 with Block 5 for a larger employment block, with the remaining smaller Block 6. The justification provided to date by Intermarket for the proposed parcel sizes does not fully address this matter and needs to.	Intermarket: Draft plan remaining as is at time of this resubmission. Discussion ongoing with staff to resolve this comment.
<b>ENVIRONMENTAL</b>		

	My comments from the second submission have been addressed. I would note that the previous Response to Agency Comments prepared by NRSI on June 5, 2020 states that the EIS will be revised and resubmitted, however an EIS was not resubmitted as part of the third submission. Since substantial changes have been made between the previously submitted EIS and now (e.g. the wetland limits have changed between the second and third submission Draft Plans), this should be properly documented in an updated EIS for transparency purposes.	NRSI: per email agreement with Kathy Padgett on Oct 22, 2020, an EIS addendum by NRSI dated Oct 2020 is included in this submission to address this comment.
<b>HERITAGE PLANNING</b>		
1	No additional comments	Intermarket: Noted
<b>ENGINEERING AND TRANSPORTATION</b>		
<b>Functional Servicing Report</b>		
<b>Section 6.1</b>		
1	References are still made to the City's ESL (Stage 1) Interim Sanitary Pumping Station as being temporary, please refer to prior comments regarding the status of the pumping station that is current under construction and revise.	EXP: Clarification has been added to the FSR to state that it was originally considered interim, however, "this SPS has now been identified as a City of Cambridge Pumping Station"
2	Tables 6-1, 6-2 and 6-3 – In these table and others, Block 3 is referred to as being 2.077ha however according to the draft plan it is 2.079ha.	EXP: Revised
3	Last Paragraph – References have been made to the local sanitary sewer as being 250mm dia, however the local sanitary sewer is 200mm dia. Please revise.	EXP: Revised
<b>Section 6.1.1</b>		
1	The City's ESL (Stage 1) Interim SPS resides within Phase 1, specifically Phase 1B. Please revise.	EXP: Phase 1B added to this section
<b>Section 6.1.3</b>		
1	1st Paragraph – References have been made to the local sanitary sewer as being 250mm dia, however the local sanitary sewer is 200mm dia. Please revise.	EXP: Revised
2	1st Paragraph – The local sanitary sewer connects to MH6A via MH105.1A. Please revise.	EXP: Revised
3	Last Paragraph – Minimum depth of cover relative to the C/L will be 2.60m. Please revise.	EXP: Revised
<b>Stormwater Management</b>		
<b>Section 4.4.1</b>		
2	Section 4.4.1 – The information provided in this section is more historical and a record of the previous approach to SWM for Blocks 1 to 4. As this method is no longer applicable for Block 1 to 4 please provide an explanation for Table 4-3.	EXP: Section 4.4.1 is important as it states the allowable release rate to Freeport Creek which was used to determine the allowable outflow from the pond.
<b>Sections 4.51 and 4.52</b>		

3	Indicate critical discharge target. Please note that "critical discharge target" is defined in the Freeport Creek Subwatershed Study and is not in reference to storm events 2yr through 100yr or Regional.	EXP: Critical discharge rate is already included in the paragraph under section 4.5. However, it has also been added to Table 4-5. As Areas 5 and 6 do not drain directly to Freeport Creek, the critical discharge rate was not included in Table 4-6 or section 4.52
<b>Section 4.6</b>		
4	Tables 4-7, 4-15, 4-16 – In this table and others, Block 3 is referred to as being 2.077ha however according to the draft plan it is 2.079ha.	EXP: Areas has been revised
<b>Section 4.7.1</b>		
5	Table 4-10 – The storage required for the 25mm is inconsistent with OTTHYMO modelling. Please revise.	EXP: Revised
<b>Section 4.7.2</b>		
6	Table 4-13 – The storage required for the 25mm is inconsistent with OTTHYMO modelling. Please revise.	EXP: Revised
	Table 4-14 – Post Development Peak flow for the 25mm event is inconsistent with OTTHYMO modelling. Please revise.	EXP: Table confirmed to match output (0.080 cms)
<b>Section 4.9</b>		
7	Table 4-18 – The areas listed for Blocks 1, 3 and 4 are inconsistent with the draft plan. Please revise.	EXP: Areas revised
<b>Section 4.10</b>		
18	Table 4-19 – The following is inconsistent with OTTHYMO output.	
	Block 1 - 25mm minor flow, Block 2 – 5 year minor flow, Block 3 – 25mm minor flow, Block 4 – 25mm minor flow and Block 5 – 25mm minor flow.	EXP: Revised/confirmed
<b>Drawing SG-01</b>		
19	It is unclear why a retaining wall is required through Section A. Please confirm the actual extent of retaining wall needed along the west side of the subdivision.	EXP: The retaining wall ensures positive drainage towards intermarket Rd and ensures that during major storms overland flow will be directed to the SWM pond via Intermarket Rd and not the adjacent properties to the west. The extent of the retaining wall is based on the conceptual grading and the intermarket Rd grades (to be revised through SPA process)
	Grading is shown to be extending into the neighbouring property to the east. The grading looks like it will also impact existing trees. A tree removal permit may be required. Please provide written permission from the property owner for any grading work will be a draft plan condition. In regards to your response in your 3rd submission letter, no note has been provided on this drawing addressing this comment.	EXP: This note is included on the drawings at the bottom of the sheet between the two northern buildings on Block 4.  Intermarket: We are working on obtaining written permission and request that this be a condition for registration (so can be formalized after draft plan approval).



**Drawing SS-01**

<p>Outlet for Blocks 5 and 6 crosses through Block 8 which will be conveyed to the City as an Open Space block. A drainage easement will be required allowing Blocks 5 and 6 to drain through Block 8.</p>	<p>Intermarket: Noted - easement to be a condition of registration</p>
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<p>For each block a storm sewer is shown leaving each infiltration system and not connecting to anything. Please revise.</p>	<p>EXP: note added to confirm the infiltration gallery is connected to the site storm sewer design to be determined at SPA</p>
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<p>Areas 411 and 410 are 0.257ha and 0.569ha respectively on Drawing SWM-02. Confirm that the values in this table are consistent with Drawing SWM-02 and revise modeling as necessary.</p>	<p>EXP: Areas 411 and 410 are consistent with the SWM report and SWM-02</p>
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**Transportation**

<p>1 No additional comments</p>	<p>Noted</p>
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**OPERATIONS**

<p>The DVMP/supplemental August 2020 Arborist Brief is accepted. The applicant should proceed to submitting a tree permit application for Operations Division/Forestry review given anticipated tree removals and grading permit application in the near future. The application form and spreadsheet can be found at the links below and all trees to be removed (or injured) above 20cm dbh must be included in the tree permit application. The application form should also include the fee (\$45) and applicable Replacement Tree Fund (RTF) payment or Landscape Plan to reduce/eliminate the RTF payment through proposed tree plantings on the blocks (i.e. only private property locations are acceptable for compensation planting).</p>	<p>NRSI: noted</p>
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**CITY OF CAMBRIDGE FIRE DEPARTMENT**

<p>1 All comments/conditions from City of Cambridge Fire Department pertain to the road, which will be dealt with by the City.</p>	<p>Noted</p>
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**Region of Waterloo - Oct 23 2020 Comments**

<p><b>Conformity with Regional Policies</b></p>	
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<p>Regional staff does not accept or agree with the proposed creation of the two (2) smaller Business Park Blocks 5 and 6 on the east side of Intermarket Road as shown on the revised draft plan (due to being constrained by design limitations associated with environmental features or property configurations). The ROP policy above states lands will be developed with parcels “greater than eight hectares in size” and not “parcels must be only 8 hectares in size”.</p> <p>Regional staff is of the opinion that the lands on the east side of Intermarket Road, including Block 5 are not constrained. Block 5 can be easily combined with Block 4 into one larger block, with only one additional smaller block remaining shown as Block 6</p> <p>The proposed draft plan of subdivision does not conform with ROP policy 2.D.22. The draft plan needs to be revised to include on the east side of Intermarket Road either one (1) large business park block, or no more than two (2) business park blocks with one of the blocks being at least eight (8) hectares in size or greater.</p>	<p>Intermarket: Draft plan remaining as is at time of this resubmission. Discussion ongoing with staff to resolve this comment.</p>
<p>ROP policy 2.D.23 below provides an opportunity for monitoring the employment lands inventory. If it can be demonstrated that there is a critical shortfall of smaller industrial parcels, smaller parcels may be permitted through an amendment to the City of Cambridge Official Plan.</p>	
<p><b>2.D.23</b></p>	
<p>Notwithstanding Policy 2.D.22, where monitoring clearly demonstrates that there will be a critical shortfall in the inventory of lands available in the short to medium term to meet the needs of new and expanding businesses requiring lot sizes less than eight hectares, the Area Municipality may permit, through amendment to its official plan, the creation of smaller parcels to meet those needs.</p>	<p>Intermarket: noted</p>
<p><b>ENVIRONMENTAL PLANNING</b></p>	
<p>The approach of “smoothing” the buffers was remedied for the PSW. However, the smoothing of the buffers around the significant woodland was not directly addressed with any new information. Notwithstanding this, as the revised plan generally conforms to the recommendations of the Subwatershed Study in regard to the perimeter of the Significant Woodland and the size of the buffer along the southern limits of Block 5 (incorporated into Block 8 – Open Space), no further information will be required at this time. For future reference, please be advised that the smoothing or averaging of feature limits and buffers are not generally supported.</p>	<p>NRSI: Noted</p>
<p>Previous comments included a request to verify how the recommendation related to construction hours would be implemented. The response received in the August 19, 2020 letter from NRSI indicates that the City of Cambridge by-law prohibiting noise between 8:00pm and 7:00 AM would ‘generally regulate’ the construction, but no specific response to any potential impacts or implications of the operation outside of the recommended timing were provided. As such, staff will request the City giveDocs 3438198 Page 4 of 6 consideration to including hours of construction (7:00AM-7:00PM) in any agreements related to construction on the site.</p>	<p>NRSI: Noted</p>
<p>Environmental Planning comments have generally been addressed, and further responses are not requested provided there are no further changes to the Plan of Subdivision. Conditions of draft approval to implement the recommendations of the Cambridge IP Park Phase 2: Business Park Environmental Impact Study (NRSI, with updates), the Freeport Creek and Tributary to the Grand Subwatershed Study (November, 2013), as applicable, and standard conditions will be forthcoming.</p>	<p>NRSI: Noted</p>
<p><b>HYDROGEOLOGY AND SOURCE WATER PROTECTION</b></p>	

	The Region has previously approved a Groundwater Monitoring Program (GMP) for this subdivision. The proposed Groundwater Monitoring Program (Exp. Services Inc., Dated August 5, 2020) has removed the statement that post-development monitoring must occur for two years following 90% build-out. Regional staff request that this statement be added to the updated GMP prior to draft plan approval.	Intermarket: updated program has been resubmitted on Oct 28, 2020 and approved by email on Oct 29, 2020
1	The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo / City of Cambridge to submit, to the satisfaction of the Region, the City and the GRCA, a final Stormwater Management Report for each business park block as part of a future Site Plan application. All infiltration galleries are to be oversized by 15% to account for decreased performance and/or disconnections in the future.	EXP: Noted
2	The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo / City of Cambridge to submit, to the satisfaction of the Region, a Salt Management Plan for each business park block as part of a future Site Plan application.	EXP: Noted
3	The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo / City of Cambridge to submit, to the satisfaction of the Region, a Spill Prevention, Management and Containment Plan as part of a future Site Plan application where chemical storage is proposed to occur (including fuel storage and/or retail fuel storage).	EXP: Noted
4	The Owner/Developer will be required to enter into a development agreement with the Regional Municipality of Waterloo / City of Cambridge to complete during- and post-construction monitoring, in accordance with the Groundwater Monitoring Program (to be re-submitted prior to draft approval). Post- construction monitoring will be required for two years following 90% build-out.	EXP: Noted
<b>Water Services</b>		
1	Section 6.2 Water Servicing, the report references a temporary connection from the 300mm on Boychuk Drive to the 600mm transmission main. This connection is no longer in consideration for Phase 1A or 1B, and should not be assumed to be constructed for Phase 2. Similarly, the watermain connection from Intermarket Road to Fountain Street along Allendale Road is not currently constructed.	EXP: Reference has been removed  Intermarket: please note that watermain design and construction is City responsibility (N-S and E-W collector roads, as well as Allendale).
2	The following Water Services comments provided in the Region's letter of March 8, 2019 have not been addressed in this updated Functional Servicing Report: the discussion about pipe sizes and velocities is not sufficient for determining whether the proposed development can be supported by the existing infrastructure.	EXP: The pipe sizes have been determined based on the Preliminary Watermain Distribution Report by MTE, which also included calculations for the velocities. Any inadequacies should be addressed by the PWDA  Intermarket: please note that watermain design and construction is City responsibility (N-S and E-W collector roads, as well as Allendale).

3	<p>In the Preliminary Water Distribution Analysis (PWDA) prepared by MTE and dated July 2019 found in Appendix D, the modeling results tables 3.1, 3.2, and 3.3 are difficult to understand. It is unclear whether the column "Required Fire Flow" is the calculated fire flow demand from Appendix B, or rather if the results in the table are the available fire flows, and associated residual pressures. It is further unclear what the column "Velocity of Max Pipe (m/s)" is referring to. Based on the value in the column, it cannot be the velocity in the pipes. Similarly, it is unclear what the column "Pipe with Max Velocity" is referring to.</p>	<p>EXP: Comment to be addressed by MTE under separate cover (not part of this submission). Note the watermain on Intermarket within phase 2 is currently under construction by City, its been installed and is currently at commissioning.</p> <p>Intermarket: please note that watermain construction is City responsibility along the N-S and E-W collector roads, as well as Allendale.</p>
4	<p>The conclusions in the PWDA indicate that in order to service Phase 2, the proposed watermain on Allendale Road must be constructed such that there will be a looped system through Phase 1 and 2. The assumptions made in the PWDA regarding a connection to the 750mm watermain in the CPR corridor are no longer valid, as the construction of Phases 1A1 and 1A2 did not include the connection to the CPR watermain.</p>	<p>EXP: Comment to be addressed by MTE under separate cover. Note the watermain on Intermarket within phase 2 is currently under construction by City, its been installed and is currently at commissioning.</p> <p>Intermarket: please note that watermain design and construction is City responsibility (N-S and E-W collector roads, as well as Allendale).</p>
5	<p>Notwithstanding the errors and omissions outlined above, the Functional Servicing Report shows that the proposed development can be appropriately serviced once the watermain on Allendale Road is constructed and a looped system is created. It may be prudent to include a condition of draft plan approval that states site development can only occur once the external work is constructed and operational. Alternatively, the consultant can evaluate through an addendum to the PWDA that shows the proposed development can be provided with adequate fire flow in an interim condition with a single connection to the water distribution system at Boychuk Drive and Maple Grove Road. However, this would create a long dead end in excess of the 150m outlined in the DGSSMS. While this may be permitted by the City of Cambridge as an interim condition, the developer may be required to provide adequate water quality measures (flushing program, auto-flusher) on a temporary basis until the Allendale Road watermain is constructed.</p>	<p>EXP: As noted above the watermain running north south in Intermarket Rd is being installed by City and is at commissioning stage. Allendale is also under construction by City at the writing of this report. The city is reconstructing Allendale to include the watermain and as such the city should be consulted regarding scheduled completion of same.</p> <p>Intermarket: please note that watermain design and construction is City responsibility (N-S and E-W collector roads, as well as Allendale).</p>