GRCA COMMENTS

No.	Region Comments Dated April 20, 2021	EXP Response
	DELEGATED AUTHORITY COMMENTS	
	All previously provided agency comments continue to apply and any identified requirements will need to be satisfied through the conditions of draft approval.	Noted
	Grand River Conservation Authority (GRCA)	
	The GRCA's most recent comments of April 20, 2021 on the revised draft plan of subdivision and supporting reports were provided to the City and the Owner/Developer separately. At this time, the GRCA is not in a position to support draft approval of the proposed plan of subdivision and requires additional matters to be addressed and/or clarified by the Owner/Developer prior to draft plan approval.	As per conversation with GRCA reviewer, SWM report has been revised to address for both water balance and erosion comments provided on April 20, 2021. The updated SWM report by EXP and iPort Cambridge Fluvial Geomorphic Assessment, Continuous Modelling and Erosion Analysis by Waters Egde have provided addtional analysis to address the concerns/
Water Balance		
	1. Infiltration targets have been set by past sub-watershed studies. The feature based water balance for the PSW was not clear in the stormwater management (SWM) report. The GRCA engineering staff requires further clarification on this matter.	The water balance section on SWM report has been updated to address this concern and to provide clarification. A summary of the SWM update for water balance as below: - Site-Wide Water Balance: It is proposed to capture 25mm rainfall from rooftop for each block for the site as a post-development infiltration measure. This approach will meet both Post- to Pre- Water Balance Requirement as per Site-wide Water Balance Assessment by the Hydrogeological Assessment and Water Balance Report, as well as the infiltration targets based on increase of hard surface as set out by Master Drainage Plan . - Feature-Based Water Balance: In order to match pre-development water balance for runoff volumes and infiltration volume, it is proposed to dedicate the rooftop of Block 3 to the PSW through infiltration and directing runoff to the PSW. As well, the rainfall depth captured from the rooftop of Block 3 is 25mm. The updated feature-based water balance shows that under post-development condition, we are exceeding runoff by 2% compared to pre-development volumes, and exceeding infiltration by 35% compared to pre-development
Erosion		
	2. The SWM report indicates that Allendale Creek ends at Riverbank Drive at a culvert, and therefore the erosion threshold is not applicable. As this does not agree with the work done by Waters Edge, or visual observations, GRCA engineering cannot agree to this without further explanation and clarification.	The SWM report has been revised to address that the Allendale Creek is both upstream and downstream of the culvert under Riverbank Drive, and erosion thresholds apply to both upstream, to be consistent with the observations by Water Edge. Refer to SWM report Section 4.4.1 and 4.5. In addition, the iPort Cambridge Fluvial Geomorphic Assessment, Continuous Modelling and Erosion Analysis by Waters Edge provided additional analysis to review the erosion impact from SWM pond to Allendale Creek and confirmed that the erosion threshold of Allendale Creek would not be exceeded under post-development conditions as per IPort Cambridge Fluvial Geomorphic Assessment, Continuous Modelling and Erosion Analysis

REGION COMMENTS

<table>
<tr><th>No.</th><th>Region Comments Dated May 14, 2021</th><th>EXP Response</th></tr>
<tr><td colspan="3">Functional Servicing Report</td></tr>
<tr><td>2. Section 6.1.1</td><td>a. The City has design invert targets at Middle Block Road and Intermarket Road that are required in order to service the Middle Block Road/Fountain Street area. As a result, the design of the sanitary trunk sewer may need to be the same or similar slope as the constructed sanitary trunk sewer south of Allendale Road. It is expected that the invert at Middle Block Road should be in the general vicinity of 302.80.</td><td>Sanitary trunk sewer has been revised as requested. The updated invert at Middle Block Road is about 303.11m. Refer to Drawing PP-04 and updated FSR</td></tr>
<tr><td colspan="3">Stormwater Management Report</td></tr>
<tr><td>4. Section 4.5</td><td>b. Please note that the status of the ownership of the land at the outlet to the existing culverts (1350mm and 450mm) under Riverbank Drive needs to be reviewed. Please note that in both cases there doesn't appear to be an existing drainage/storm easement or legal outlet for the culverts.</td><td>Addressed. As discussed, the 450mm will not be used as outlet due to the status of ownership. The design is revised to reflect that and a note is also provided in SWM report. 1350mm culvert will continue to be used as an outlet from the</td></tr>
<tr><td></td><td>c. Please confirm that the allowable rates from Table 7 are consistent with the Allendale Road storm sewer design brief. Please note that we have no objection to the allowable being less than what can be accommodated in the Allendale Road storm sewer. Based on our review we note the following:
<table>
<tr><th>Storm</th><th>Allendale Road Storm Design Brief (m3/s)</th><th>iPort 3rd Draft Submission Table 7 (m3/s)</th></tr>
<tr><td>2 yr</td><td>0.108</td><td>0.105</td></tr>
<tr><td>5 yr</td><td>0.210</td><td>0.190</td></tr>
<tr><td>10 yr</td><td></td><td>0.551</td></tr>
<tr><td>50yr</td><td></td><td>1.258</td></tr>
<tr><td>100 yr</td><td>1.612</td><td>1.542</td></tr>
</table></td><td>Reviewed and addressed. Table 3 on SWM report provided justification on how the allowable release rates were extracted from the Allendale Road Storm sewer design brief. Table 8 provided a comparison of preliminary results of post-development peak flows discharging towards Allendale Road and the allowable release rates as established & summarized on Table 4.</td></tr>
<tr><td></td><td>d. Please confirm that the allowable rates from Table 8 are consistent with the OTTHYMO output.</td><td>Addressed. Tables have been reviewed to be consistent with VO output</td></tr>
<tr><td>12. Appendix F</td><td>a. Storm Water Quality & Permanent Pool Volume – Based on MOE SWM</td><td rowspan="2">Addressed. Appendix F is updated. A note was provided to demonstrate how the storage was interpolated based on the Table 3.2 of MECP guideline</td></tr>
<tr><td></td><td>Planning and Design Manual Table 3.2, an imperviousness of 82.37% would equate to a total volume required of 245.62 m3/ha (205.62 m3/ha for permanent pool and 40m3/ha for extended detention). Please review and revise.</td></tr>
<tr><td rowspan="2">c. Storm Sewer Design Sheet</td><td>ii. MH-15 to HW08 – Maximum MH spacing is 90m for 600mm dia sewers and smaller and 130m for 600mm dia sewers and larger. Please revise.</td><td>Addressed. All MH spacings for sewers is less than or equal to 90m for 600mm dia(or less) pipes and 130m for pipes more than 600mm diameter. Please refer to updated design sheet and SWM-03</td></tr>
<tr><td>ix. Additional Land – Please note that a runoff coefficient of 0.58 may be low depending on the type of residential development anticipated for this block.</td><td>Addressed. As discussed, the runoff coefficient for the Additional Land is revised to 0.65 per City of Cambridge</td></tr>
<tr><td rowspan="2">16. Table 12</td><td>d. Please confirm that allowable 100 year flows are consistent with OTTHYMO output.</td><td rowspan="2">Addressed. Tables are reviewed to ensure the consistency with VO model</td></tr>
<tr><td>e. Block 2 SOUTH Roof Storage is inconsistent with OTTHYMO output.</td></tr>
<tr><td>Drawings</td><td></td><td></td></tr>
<tr><td>1. Drawing SWM-01</td><td>b. Area 103 is inconsistent with Intermarket's IP Park Phase 2 SWM plan. Please note that IP Park Phase 2 SWM-01 Area 1000 indicates that under Pre-development conditions that 1.97ha drains south to IP Park Phase 2, not to the existing culvert crossing Riverbank Drive. Please review how much area drains to the existing 450mm culvert and revise allowable flow rates.</td><td>Addressed. SWM-01 is reviewed and revised to be consistent with the IP Park Phase 2 area as per comment. The area (Catchment 103) and pre-development flow rates to the existing 450mm Riverbank culvert have been updated on the model and report (Table 2 on SWM</td></tr>
<tr><td>11. Drawing PP-03</td><td>b. Please confirm how the Regional event will flow into the SWM facility. Will it flow overland or be conveyed into the SWM pond via the SWM corridor's piped outlet.</td><td>For the catchments discharging to SWM corridors, flows from SWM corridor will be controlled by a control structured up to Regional storm and conveyed into SWM pond through pipe (Refers to SWM report Section 4.8.1). For the catchments not discharging to SWM corridors, flow will be conveyed to SWM pond through overland flow. Additional explaination is also provided on Section 4.10.</td></tr>
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REGION COMMENTS

No.	Region Comments Dated May 21, 2021	EXP Response
	DELEGATED AUTHORITY COMMENTS	
	All previously provided agency comments continue to apply and any identified requirements will need to be satisfied through the conditions of draft approval.	Noted
	Grand River Conservation Authority (GRCA)	
	The GRCA's most recent comments of April 20, 2021 on the revised draft plan of subdivision and supporting reports were provided to the City and the Owner/Developer separately. At this time, the GRCA is not in a position to support draft approval of the proposed plan of subdivision and requires additional matters to be addressed and/or clarified by the Owner/Developer prior to draft plan approval.	Addressed. The GRCA comments have been addressed with revised SWM report by EXP and iPort Cambridge Fluvial Geomorphic Assessment, Continuous Modelling and Erosion Analysis by Waters Edge.
	REGIONAL COMMENTS	
Conformity with Regional Policies		
	The majority of the subject lands within the draft plan of subdivision are designated "Prime Industrial/Strategic Reserve (Serviced)" in the Regional Official Plan (ROP). The following ROP policies are applicable to the proposed plan of subdivision:	Noted
	2.D.22 Lands within the Prime Industrial/Strategic Reserve (Serviced) designation will be developed for fully serviced employment and ancillary land uses. Unless otherwise compromised by design limitations associated with *environmental features* , property configurations, the provision of new local roads or existing development, the lands will be developed as parcels greater than eight hectares in size.	Noted
	2.D.25 The necessary environmental, water and wastewater servicing and transportation studies will be completed and approved by the Region, the Area Municipality, the Grand River Conservation Authority, and the Ministry of Transportation, as appropriate, before the approval of *development applications* applicable to lands within the Prime Industrial/Strategic Reserve	Noted
	The lands east of the proposed Intermarket Road are located within the North Cambridge Business Park and are designated in the City of Cambridge Official Plan as Business Industrial and Natural Open Space System with site specific policies 8.10.74 and 8.10.75, approved as part of City Official Plan Amendments (OPAs) Nos. 29, 30, and 35 (Parks and Trails). These lands are zoned Industrial (M3) and Open Space (O1) with site specific zoning provisions and a range of business industrial uses, office buildings and associated	Noted
	The North Cambridge Business Park OPAs and associated zoning by-laws have implemented the above ROP policy 2.D.22 with respect to the requirement for employment lots that are greater than eight (8) hectares in size. Regional staff supports the large business park blocks within the proposed draft plan. In addition, the OPAs included policies listing additional study requirements that need to be completed prior to approving a development application on the subject lands. The updated studies that were submitted in support of the revised plan of subdivision (third submission) were evaluated by Regional staff and comments with respect to	Noted
	Further, a portion of the stormwater management facility Block 7 is located on lands that are outside the Urban Area boundary and currently designated in the ROP as Prime Agricultural Area. These lands are subject to an appeal with the Local Planning Appeal Tribunal (LPAT) related to ROPA 2. The stormwater management facility block is proposed to be dedicated to the City as a municipal use. The Planning Justification Report (MHBC Planning, Revised January 2021) acknowledged that the LPAT appeal involving the lands proposed as a stormwater management facility for the subdivision must be resolved prior to draft plan	Noted
Environmental Planning		
General Policy comments:		
	Staff do not believe that there is room for discretion with regard to the buffer widths in this matter based on the documents and approvals cited above. Notwithstanding this, staff have again reviewed the information in the EIS provided by iPort to identify any support for reduced	Noted
	For the reasons provided above, Regional staff are not able to recommend approval of the proposed plan of subdivision as it does not conform to the approved Freeport Creek Subwatershed Study as it relates to the ESPA on the subject lands. **Prior to draft plan approval, the 30m buffer must be incorporated into the proposed draft plan.**	
Water Services		
	Water Services Staff have reviewed the Preliminary Functional Servicing Report (Exp Services Inc., February 26, 2021) and staff notes that staff's earlier technical comments regarding this report as provided in an email dated December 18, 2020 were not addressed,	See below response.
	1. The applicant did not include the Appendix D Water Distribution Analysis, which is referenced in Section 6.2, page 15 of the report.	Addressed. Water Distribution Analysis and Addendum to Preliminary Water Distribution Analysis are provided in the

	2. Section 6.2 discusses the various required watermains to be installed to support the development within this subdivision. Is the report indicating that all the watermains are to be installed prior to allowing any development to connect to the distribution system? The previous comments on the FSR required more detail on how the FSR for the subdivision aligns with MTE's servicing report and this information has not been provided in the updated FSR.	The email dated December 18,2020 from the Region was reviewed. To address region's comment regarding the construction timing of watermains, MTE has provided an Addendum to Preliminary Water Distribution Analysis, which provides additional scenarios of water servicing to different stages of IPort development. In addition, the project is planning on advancing the construction of watermain on Fountain St by a year to further meet the flow requirements as required by the Ultimate Scenario. More details refer to the Addendum by MTE, which is also
	Prior to draft plan approval, the FSR must be updated to address the previous comments identified in staff's email dated December 18, 2020.	
	Land Use Compatibility	
	As a condition of draft plan approval, the Region will require the Owner/Developer to enter into a development agreement with the City of Cambridge to complete, as part of any site plan application for Business Park Blocks 1-3 in this plan, a detailed Stationary Noise Study to assess potential noise impacts on any adjacent noise sensitive land uses and recommend appropriate noise mitigation measures, as well as confirm the requirement for any noise wall/barrier, and if required, to enter into a subsequent agreement with the City to implement any approved noise mitigation measures.	Noted
	Region of Waterloo International Airport	
	Regional comments with respect to the Region of Waterloo Airport Zoning Regulations as provided in our letter dated July 9, 2020 continue to apply to any future development on the	Noted
	Cultural Heritage	
	Regional staff acknowledges receiving the required Archeological Assessments and the Ministry's Acknowledgement Letters for the property at 250 Allendale Road.	Noted
	Finalized Archeological Assessments and an Acknowledgement Letter for the property at 105 Middle Block Road are still required. The completed Assessment(s) for this property must be submitted **prior to draft plan approval**, while the Acknowledgement letter may be submitted as a condition of draft approval.	Noted
	Next Steps	
	The Owner/Developer should be advised that receipt of these post circulation comments does not constitute a draft or final approval of this application. Prior to draft approval by the Region, the City of Cambridge must provide formal comments on the application and/or a recommendation in support of draft plan approval, including the City's conditions of draft	Noted
	Further, prior to draft approval, the Owner/Developer must submit to the Region five (5) copies of the plan to be draft approved. The plan must be singed by the Owner and Surveyor. Once the plan of subdivision is draft approved, the draft approval will take effect 21 days after the day the notice of decision is issued, provided no appeals are received in accordance with Section 51(39) of the *Planning Act*.	Noted