



CATARAQUI REGION CONSERVATION AUTHORITY
1641 Perth Road, P.O. Box 160 Glenburnie, Ontario K0H 1S0
Phone: (613) 546-4228 Toll Free (613 area code): 1-877-956-CRCA
Fax: (613) 547-6474 E-mail: info@crca.ca
Websites: www.crca.ca & www.cleanwatercataraqui.ca



September 18, 2015

File: DPS/GAN/210/2014

Sent by e-mail

Ms. Brenda Guy
Manager of Community Development
Town of Gananoque
30 King Street East, Box 100
Gananoque, ON K7G 2T6

Dear Ms. Guy:

**Re: Application for Development Permit DP2014-03 – Formal Submission
Island Harbour Club (RMP Contracting and Development)
175 St. Lawrence Street
St. Lawrence River**

Staff of the Cataraqui Region Conservation Authority (CRCA) have received the formal circulation of application DP2014-03. We reviewed and provided comments on all of the supporting documents over the past year, including the site plans, servicing report, environmental impact assessment, and wave uprush analysis. Please ensure that our previous comments regarding stormwater management have been addressed to the Town's satisfaction.

Ontario Regulation 148/06: Development, Interference with Wetlands, and Alterations to Shorelines and Watercourses, applies to all lands within 15 metres of the regulatory floodplain of the St. Lawrence River, and so encompasses the northwest corner of the proposed development. Within the regulated area, the proposed building will meet the minimum 6 metre horizontal setback from the floodplain and the minimum floodproofing standards specified in the CRCA's guidelines for implementing O. Reg. 148/06.

Outside the regulated area, staff continue to have concerns relating to flooding hazards. The proposal needs to meet the intent of the Provincial Policy Statement on flooding hazards even though it is not fully encompassed under O. Reg. 148/06.

The minimum floodproofing standards applied in the Cataraqui Region require all exterior openings, finished main floors, basement floors, and mechanical services (e.g. electrical and heating) to have a minimum elevation equal to the regulatory flood elevation plus 0.3 metres. In this location the minimum elevation would be 76.45 metres geodetic. As indicated above, the proposal meets these standards for exterior openings, finished main floors, and the underground parking level (in the regulated area only). The proposal but does not meet the standards for basement floors and mechanical services outside of the regulated area.

Ms. Guy (DP2014-03)
September 18, 2015

In correspondence from February 2015, we indicated that given that the building will be set back horizontally from the regulatory floodplain and there will be no openings in the wave uprush portion of the floodplain, it would be reasonable for the floodproofing standard to be relaxed to the 1:100 year water level (75.9 metres geodetic) plus 0.3 metres for the underground parking level. We had also indicated that if this reduced standard could not be achieved, it would be the developer's responsibility to justify a further reduced standard and to propose other/additional floodproofing measure to make up for it, to our satisfaction. It should also be to the Town's satisfaction.

The lowest floor elevation proposed for the underground parking level is 75.87 metres geodetic. The mechanical and sprinkler room, the elevator lobby and the accessible parking spaces would be located at this elevation. The submitted documentation does not address the deficiency in floodproofing.

Please note that if this proposal is approved by the Town, the applicant will require a permit under O. Reg. 148/06. The application package can be downloaded from our website (crca.ca).

If you have any questions please contact the undersigned at (613) 546-4228 ext. 235, or by e-mail at cwoods@crca.ca.

Yours truly,

Original signed by:

Christine Woods MCIP, RPP
Resource Planner

cc. Andrew Ball, RMP Construction and Development Ltd., via e-mail

Memo

To: Brenda Guy, Manager, Community Development, Town of Gananoque
From: Carl Bray, Bray Heritage
Date: Thursday, August 28, 2014
RE: Island Harbour Club (175 St. Lawrence Street) Heritage Impact Study: Peer Review

Dear Brenda,

Thank you for requesting my firm to prepare a peer review of the Heritage Impact Study (HIS) submitted for this project. The report, dated May, 2014 and prepared by Golder Associates, was sent to me along with elevations and plans for the proposed development. I have reviewed these documents in relation to the Town of Gananoque's Heritage Impact Study Guidelines (attached to the Golder report as Appendix A).

Study Context

The report addresses a development application made for the former industrial property bounded by Kate, St. Lawrence, Market, and Water Streets in the Lowertown district of Gananoque. This was the site of the Mitchell & Wilson Ltd. construction works which, for much of its history in the 20th century, consisted of the manufacture and storage of construction materials. The site also included oil storage tanks on one corner of the property. The industrial uses ceased operation and the site was converted to commercial uses before closing and the property being acquired by the Town. The property has since been purchased by a private land development company and is proposed to be redeveloped as a four storey mixed commercial residential complex known as the Island Harbour Club.

The Heritage Impact Study was one of several studies required by the Town in order for the proposed development to proceed. The Town's Official Plan (Section 5.4.9) outlines the conditions and requirements for Heritage Impact Studies. In this instance, the requirement is triggered primarily by the adjacency of a heritage property, the former Pump House, designated under Part IV of the *Ontario Heritage Act*.

At the time the HIS was submitted, there remained several structures on the property. The HIS determined that these structures had no heritage significance. The structures have since been demolished. Archaeological and environmental/geotechnical studies have been prepared separately and are not the subject of this review.

Study Scope

The Study appears to address the majority of the items listed in the Town's HIS Guidelines. It provides a very comprehensive review of the site's development history within the context of the history of the town. It reviews the planning policy context thoroughly, from Provincial policy down to the Town's planning regulations. Lowertown is subject to special policies via the Lowertown Master Plan and these are reviewed for their relevance to heritage resource conservation. Overall, the report assesses impact within a broad historical and policy context.

Impact Assessment

The (formerly) existing buildings on the property were assessed as part of the HIS and determined to have no cultural heritage significance (Section 5). As a result, the Study recommended neither listing on the Town's Register of Heritage Properties nor designation under Part IV of the *Ontario Heritage Act*. These recommendations were based on a visual inspection of the buildings, informed by the historical research conducted on the site's development history.

Although I agree with the conclusion that the buildings did not warrant protection, the Study could have addressed the Town's HIS Guidelines more specifically had it undertaken the following tasks:

- Provided a general assessment of the condition of the buildings, as noted in Guideline 3.2.5, in order to support the conclusion that they could be removed;
- Provided more information on the urban context of the proposed development, by including a site plan and photographs or images showing the development in that context, as noted in Guideline 3.4.3 (this would also help address Guideline 3.4.2.2 which discusses "neighbourhood appearance"); and
- Specifically addressed the issue of potential incorporation of all or portions of the existing buildings within the new development, as stated as an option for non-heritage resources in Guideline 3.6.3.3.

Impact on adjacent heritage resources – the Pump House – is addressed and recommendations made for ensuring that views of the Pump House are not unduly restricted.

Conclusions and Recommendations

Overall, the HIS is a comprehensive report providing the Town with professional recommendations supported by thorough research into the property's history and policy context. It addresses the Town's HIS Guidelines sufficiently to justify the Study conclusions and recommendations. The Lowertown Master Plan is addressed through assessment of views and through description of the property's history. Suggestions are made for both the content of any interpretation of that history as well as for incorporation of an industrial artifact (pulley) into the new development.

While this Study is sufficient for the Town's purposes, it might be advisable for the Town to consider ensuring that future HIS reports slightly expand their scope to include assessment of impact on the surrounding urban context. While the Golder report was careful to avoid commentary on urban design, it did comment on building design which, in this case, will have an impact on the neighbourhood.

How this could affect the proposed development is a factor of the area's history and current character. The subject property was formerly part of a predominantly industrial area, served by branch rail lines and characterized by outdoor storage of materials next to industrial buildings of various shapes and sizes. Aside from some housing extant still in the early 20th century, the area was not residential in character. The area two blocks north, however, had and still has the character of a stable and mature residential neighbourhood. As a result, the new development can be seen in the context of the former industrial character but also as establishing a new, predominantly residential character. The interface between the adjacent residential neighbourhood and the new residential development needs further consideration by the Town in order to ensure an effective transition, both visually and functionally. The issue of a compatible relationship between new, higher density development and existing development still remains to be addressed.

In terms of this development, the proposed building attempts to make a compatible relationship by taking some design cues from the adjacent residential area, such as balconies, chimneys, varied massing (including towers), and brick and wood detailing. But these are perhaps token gestures, given the contrast in scale between the proposed building and the single family dwellings predominant in the adjacent neighbourhood.

However, this contrast in size, if not in use, has a historical precedent that may help ensure an acceptable transition. The new building's massing echoes some of the larger of the former industrial buildings (such as the former Cow and Gate factory) once located nearby in Lowertown. As the first of a series of predominantly residential developments in this area, this project will establish a precedent for building design and urban design that still has echoes of the past.

As a result, the ways in which the Town can address the issue of the evolving character of this part of the community will be through the types of interpretation suggested in the Golder report and in the Lowertown Plan as well as by encouraging the type of medium scale development recommended here, with proper regard for the transition to adjacent land uses. In concert with the types of improvements to the public realm recommended in the Lowertown Plan, the change in urban character brought about by conversion of industrial lands to residential and commercial can be understood in its historical context and support the Town's broader goals of celebrating its past while fostering its future.

Ministry of Tourism, Culture and Sport

Culture Programs Unit
Programs and Services Branch
Culture Division
401 Bay Street, Suite 1700
Toronto ON M7A 0A7
Tel.: (807) 475-1628
Email: Paige.Campbell@ontario.ca

Ministère du Tourisme, de la Culture et du Sport

Unité des programmes culturels
Direction des programmes et des services
Division de culture
401, rue Bay, bureau 1700
Toronto ON M7A 0A7
Tél. : (807) 475-1628
Email: Paige.Campbell@ontario.ca



Dec 10, 2014

Adam Pollock (P336)
Past Recovery Archaeological Services
4534 Bolingbroke Maberly ON K0H 2B0

RE: Review and Entry into the Ontario Public Register of Archaeological Reports: Archaeological Assessment Report Entitled, "STAGE 2 AND 3 ARCHAEOLOGICAL ASSESSMENTS OF 175 ST. LAWRENCE STREET, PART LOTS 13 AND 14, CONCESSION 1 GEOGRAPHIC TOWNSHIP OF LEEDS, TOWN OF GANANOQUE, ONTARIO ", Dated Oct 22, 2014, Filed with MTCS Toronto Office on Nov 4, 2014, MTCS Project Information Form Number P336-0043-2014,P336-0046-2014

Dear Mr. Pollock:

This office has reviewed the above-mentioned report, which has been submitted to this ministry as a condition of licensing in accordance with Part VI of the Ontario Heritage Act, R.S.O. 1990, c 0.18.¹ This review has been carried out in order to determine whether the licensed professional consultant archaeologist has met the terms and conditions of their licence, that the licensee assessed the property and documented archaeological resources using a process that accords with the 2011 Standards and Guidelines for Consultant Archaeologists set by the ministry, and that the archaeological fieldwork and report recommendations are consistent with the conservation, protection and preservation of the cultural heritage of Ontario.

The report documents the assessment of the study area as depicted in Maps 15, 17, and 18 of the above titled report and recommends the following:

- 1) The Stage 3 archaeological assessment of the Island Harbour Site (BbGa-16) has resulted in a determination that the site possesses a pre-Contact component of sufficient cultural heritage value or interest to warrant Stage 4 mitigation of development impacts for the site (see Map 18). Following discussions with the project manager and land owner, as well as engagement with the Mohawk Council of Akwesasne and the Mohawks of the Bay of Quinte - Tyendinaga Mohawk Territory, Stage 4 mitigative excavations were selected as the preferred approach to addressing outstanding archaeological concerns for the site. Accordingly, the hand excavation of one metre square units in the area requiring mitigation, using the established grid, is recommended (see Map 19). As the site is buried by gravel fill from the modern parking lot it is also recommend that c. 20 cm of the gravel fill be mechanically excavated from the area of excavation under the supervision of a licensed archaeologist. All further excavation of the remaining gravel should be undertaken by hand to avoid additional disturbance to the soils underlying the gravel.
- 2) The historic component of the Island Harbour Site (BbGa-16) does not meet the requirements for Stage 4 mitigation of development impacts and the cultural heritage value or interest of this component should be considered sufficiently documented through this Stage 3 site-specific assessment.

Based on the information contained in the report, the ministry is satisfied that the fieldwork and reporting for the archaeological assessment are consistent with the ministry's 2011 Standards and Guidelines for Consultant Archaeologists and the terms and conditions for archaeological licences. This report has been entered into the Ontario Public Register of Archaeological Reports. Please note that the ministry makes no

representation or warranty as to the completeness, accuracy or quality of reports in the register.

Should you require any further information regarding this matter, please feel free to contact me.

Sincerely,
Paige Campbell
Archaeology Review Officer

cc. Archaeology Licensing Officer
Andrew Ball, RMP Contracting and Development
Brenda Guy, Community Development

¹In no way will the ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report(s) or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or the Report(s) is otherwise found to be inaccurate, incomplete, misleading or fraudulent.