



December 01, 2021

Mr. James Griffin
Intermediate Planner
Planning Division, Development Services
The Corporation of the County of Prince Edward
280 Main Street, 2nd Floor
Picton, ON K0K 2T0

Dear James:

RE: File Nos. 13T-20-503, OPA4-2020 and Z51-20 – Hennessy Street Subdivision – Part of Lots 47, 49 and 62, Registered Plan 3 (Rossmore), Part of Lot 60, Concession 1, Elm Island, Part 1 on Plan 47R-8725, Township of Ameliasburgh, Now in the Municipality of the County of Prince Edward (Georgios and Kyria Georgiou)

We are writing to you on behalf of Georgios and Kyria Georgiou regarding File Nos. 13T-20-503, OPA4-2020 and Z51-20 for the Hennessy Street Subdivision in the Village of Rossmore. Further to the technical review comments received from the County of Prince Edward Development Services staff and Environmental Advisory Committee on October 25, 2021 and October 22, 2020, respectively, along with the Ministry of Transportation Corridor Management Planner on August 31, 2021 and Quinte Conservation Planning & Regulations Manager on March 15, 2021, we wish to summarize and formally respond to these comments.

Table 1, below, is a summary of County of Prince Edward staff and agency technical review comments and our response. This letter, as well as the below mentioned reports and drawings, forms the Georgiou's Subdivision 3rd submission.

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Table 1: Technical Review Comments Summary:

Agency/Staff/Date	Comment	Response
Development Services		
Planning Rationale/Draft Plan of Subdivision – RFA Planning – June 23, 2021		
<p>County of Prince Edward Planner October 25, 2021</p>	<p>1. <i>Section 2.1.4 of the Provincial Policy Statement states that no development (including creation of new lots) is permitted in Provincially Significant Wetlands. The revised EIS confirms that there is Significant Wetland in the parkland block and lots 3-5. Please revise the draft plan so that no new lots include Provincially Significant Wetland;</i></p>	<p>The Draft Plan has been revised to exclude the portion of the Sawguin Creek Marsh on Block 6 Parkland and include a Conservation Easement on Lots 3, 4 and 5. By way of explanation, the lot fabric has to remain largely intact as the property has already completed Land Titles Absolute in 2016 (prior to any detailed environmental assessment) and cannot be revised to “remove” the wetland areas from the land holding. We have made enquiries regarding conveyance of the wetland areas to a not-for-profit land conservation organization and it was confirmed that the available wetland within the subdivision area is too small to consider as an option. The best possible solution we have been able to devise to address Section 2.1.4 of the Provincial Policy Statement (PPS) is to create a Conservation</p>

Agency/Staff/Date	Comment	Response
		<p>Easement in favour of the County of Prince Edward. In addition to environmental protection Official Plan designation and zoning, a Conservation Easement will establish additional protection of the wetland as it will be surveyed, barred and registered on title of the applicable parcels. The wording in the easement document will be similar to a restrictive covenant to prohibit site alteration to establish a “no touch” area. It is important to note that lots are not being created within a provincially significant wetland as the frontage and access are outside of the feature, and sufficient building envelopes are provided outside of appropriate Environmental Protection Zone and setbacks. The lot fabric matter is considered a highly technical issue created at the time of Land Titles Absolute, but that consistency of the PPS is satisfied.</p>

Agency/Staff/Date	Comment	Response
		<p>In addition to the above response, we have obtained the following legal opinion:</p> <p><i>“The objective and intent of the Provincial Policy Statement prohibiting provincially significant wetlands from being included in development would appear to be to ensure that environmentally sensitive wetlands remain undisturbed. In our opinion, the best means to protect the lands in this instance would be to register a restrictive covenant over the wetlands areas together with an easement in favour of the municipality. The restrictive covenant would prohibit any disturbance of the wetlands of any kind and ensure that the lands remain untouched. The easement would permit the municipality’s agents and employees access to the lands to ensure the covenant has been complied with and there has been no disturbance. The effect of the Conservation easement and restrictive covenant would</i></p>

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		<p><i>be to effectively remove the wetlands from any possibility of development.</i></p> <p><i>In the alternative, if ownership of these small parcels are conveyed to the municipality they would be open for access and use by the general public which would leave the area less protected.” – Musgrove, K. (November 03, 2021). Email. O’Flynn Weese.</i></p>
	<p>2. <i>As the land adjacent to the PSW on the Parkland Block and Lots 3-5 is Crown Land there is an opportunity for a public trail along the back of the lots to be deeded to the County.</i></p>	<p>All previous discussions with County staff have contemplated a marsh-view trail around the Sawguin Creek Marsh from the westerly extent of the Watermark on the Bay parkland, north between the wetland and Highway 62 and around to the existing terminus of Hennessy Street. The Plan provides parkland at the existing terminus of Hennessy Street as an appropriate and logical conveyance to the County in accordance with the Rossmore Secondary Plan. The developer agrees in principle this is the most</p>

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		<p>practical and reasonable trail route. The developer agrees in principle to convey the remainder of the trail to the County over time as the “Other Lands Owned by Applicant” develop.</p>
	<p>3. <i>Please provide more detail on the park to show how the "Trailhead" is consistent with the Trail Connection in Schedule B: Secondary Plan Transportation Map;</i></p>	<p>The Rossmore Urban Centre Secondary Plan was approved in April, 2015. Land Titles Absolute for the site was completed the next year in 2016. At the time the Secondary Plan was approved, the subject property included a large portion of the Sawguin Creek Marsh. This was subsequently removed in 2016 through the Land Titles process as it was determined the marsh area is not patented land. This process was completed together with the current owner, Quinte Conservation and Watson Land Surveyors. This said, much of the activity route shown on Schedule is no longer under the control of the owner but now under Crown jurisdiction. Notwithstanding this,</p>

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		<p>approximately two thirds of the Activity Route outlined between the existing terminus of Hennessy Street and the westerly extent of the Watermark on the Bay park is wetland. It is presumed a trail around the wetland versus via board through the wetland would have less environmental impact and be more cost effective.</p>
	<p>4. <i>The current outlet path for the roadside ditch along Hennessey Street is over the subject lands and into the Bay of Quinte. This should be maintained as opposed to the proposed outlet into the wetland on the west side of the road. A road cross culvert shall be installed at the enhanced grass swale to convey runoff from the west ditch to the Bay of Quinte;</i></p>	<p>The Conceptual Drainage Plan by Jewell Engineering has been revised to provide a cross culvert as requested.</p>
	<p>5. <i>A 10.0m wide block between Lot 1 and Lot 2 shall be deeded to the municipality for the purposes of a stormwater outlet.</i></p>	<p>A 5-metre easement is typically applied for drainage / servicing purposes. Jewell Engineering has confirmed a 5-metre easement is appropriate for the enhanced grassed swale between Lots 1 and 2, is the standard width</p>

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		<p>for drainage purposes and is the width used on other recently approved plans of subdivision in the County. The Development Site Plan by Jewell Engineering has been revised to illustrate a 5-metre wide drainage easement between Lots 1 and 2.</p>
Development Services		
Environmental Impact Study		
<p>County of Prince Edward Planner October 25, 2021</p>	<p>6. <i>Engineering plans shall include the recommendations from this report;</i></p>	<p>The developer agrees that the applicable recommendations of the Environmental Impact Study shall be included during detail design following Draft Plan Approval.</p>
	<p>7. <i>A Tree Preservation, Planting and Management Report will be required as part of Draft Plan Conditions. Included in this report shall outline the recommendation that in total 100 native trees and berry shrubs be planted within the 30m PSW setback to enhance wildlife habitat on the Site; and</i></p>	<p>Agreed.</p>
	<p>8. <i>Please review and respond to the Peer Review Recommendations.</i></p>	<p>See below.</p>

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Development Services		
Functional Servicing Report – Jewell Engineering – June 7, 2021		
<p>County of Prince Edward Planner October 25, 2021</p>	<p>9. <i>Recommendation 3.1.5 Reduced Lot Grading is not permitted. Grades less than 2% typically results in ponding or longer durations where grass is wet and "squishy". We are aware of existing ponding and flooding situations along Hennessy Street. Elevations less than 1.0m above ground water elevations are not effective for infiltration as an outlet.</i></p>	<p>Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p>
	<p>10. <i>Recommendation 3.2 Conveyance should acknowledge existing roadside drainage from Hennessey Street passing through the site.</i></p>	<p>Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p>
	<p>11. <i>Development Site Plan - June 2021</i></p> <p>a. <i>A cross culvert is required under Hennessey Street at the Enhanced Grass Swale to convey ditch flow from the west ditch to the east. The flat wetland outlet is difficult to maintain and the culvert should act as an alternative stormwater outlet.</i></p> <p>b. <i>Driveway culverts at either Lot 3 or 4 (perhaps both) could be eliminated if the ditch high point is relocated to this location.</i></p> <p>c. <i>Enhanced Grass Swale shall be contained within a 10m block deeded to the County.</i></p>	<p>a. Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p> <p>b. Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p> <p>c. A 5-metre easement is typically applied for drainage / servicing purposes. Jewell Engineering has</p>

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	<p><i>d. Stormwater design shall include existing offsite drainage flows on Hennessey Street. In other words, the ditch along the frontage of Lot 1 and the Enhanced Grass Swale shall be low enough to accept runoff from the Hennessey Road ditch.</i></p>	<p>confirmed a 5-metre easement is appropriate for the enhanced grassed swale between Lots 1 and 2, is the standard width for drainage purposes and is the width used on other recently approved plans of subdivision in the County.</p> <p>d. Agreed. Jewell Engineering has confirmed detailed design drawings will ensure that ditches are graded to ensure positive drainage of the existing Hennessey Street ditches to the Bay of Quinte.</p>
Development Services		
Phase One Environmental Site Assessment – REI – July 5, 2021		
<p>County of Prince Edward Planner October 25, 2021</p>	<p><i>12. A site visit made by staff identified several locations of garbage located on the property. Removal of this is noted in recommendations 15 of Cambium EIS. It is unclear of the extent of the volumes or types of garbage on the site. This concern should be investigated and comment provided to provide direction to clear this concern.</i></p>	<p>Historically, garbage has been dumped at this property because it is located at the end of Hennessey Street. Dumped items include scrap metal, tires, residential garbage bags, beer bottles / cans, logs, fishing huts and other items. The developer has been actively removing garbage from the</p>

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		<p>property – two trailer loads to-date – and will continue the cleanup efforts during site development until it is complete. The developer feels this is both better for the environment and in their best interest to complete the clean up for marketability and divesture of the project.</p>
Development Services		
Water Department		
<p>County of Prince Edward Planner October 25, 2021</p>	<p><i>Functional Servicing Report (pg 6) - states "the existing 150mm watermain will be extended approximately 85m to service the Hennessy Road extension and proposed 5 lots subdivision." We assume the new section of pipe will be PVC and if so, will require stainless steel band style service saddles for the service connections. We would like to specify that the service saddle is stainless steel as well as all associated hardware.</i></p>	<p>Noted. Refer to response letter dated November 19, 2021 by Jewell Engineering for detail.</p>
	<p><i>Functional Servicing Report (pg 3) - reads "due to the test configuration, Jewell has included the 66 m pipe length from Hydrant #4028 to Hydrant #4029 within the pressure loss calculations discussed in Section 2.3." According to the PEC internal GIS viewer, the approximate pipe length between fire hydrants 4028 and 4029 is 149m. We</i></p>	<p>Noted. Refer to response letter dated November 19, 2021 by Jewell Engineering for detail.</p>

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	<i>just want to ensure the calculations are correct to ensure proper fire flows are available.</i>	
	<i><u>NOTE:</u> Groundwater levels in this area can fluctuate significantly, affecting the ability to make the watermain tie-in and repairs. This will need to be taken into consideration.</i>	Noted. Refer to response letter dated November 19, 2021 by Jewell Engineering for detail.
	<i><u>NOTE:</u> The use of "K copper" for the water service connection from the watermain to the curb stop is preferred. "K copper" seems to last longer and also allows staff to locate the watermain if the tracer wire ever fails on the watermain or service.</i>	Noted. Refer to response letter dated November 19, 2021 by Jewell Engineering for detail.
	<i><u>NOTE:</u> A fire hydrant installation will be required in the cul-de-sac to allow for proper flushing of the distribution system and for fire flow purposes.</i>	The Development Site Plan by Jewell Engineering has been revised to show a fire hydrant installed at the end of the cul-de-sac – Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.
	<i><u>NOTE:</u> A new frost-free sampling station will need to be installed at the dead end and the current frost-free sampling station will need to be properly removed from service.</i>	The Development Site Plan by Jewell Engineering has been revised to show a sampling station installed

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		<p>at the end of the cul-de-sac – Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p> <p><i>NOTE: Curb stops should not be located in the driveways.</i></p> <p><i>NOTE: Any fire hydrant lead that crosses a ditch or culvert requires proper insulation if 1.80 m of cover cannot be maintained.</i></p> <p><i>NOTE: A full and proper review cannot be completed, at this time, as only a functional servicing report has been provided and technical drawings have not been provided for review. When the complete set of technical drawings are available, we would appreciate the opportunity to revisit this development and provide further comments.</i></p>
Prince Edward County Environmental Advisory Committee		
<p>Environmental Advisory Committee Chair October 22, 2021</p>	<p><i>The committee understands that a second EIS was undertaken and it has been peer reviewed by Muncaster Environmental Planning Inc. (MEPI). The committee agrees with the recommendations</i></p>	<p>The developer agrees to implement the recommendations of the Environmental Impact Study.</p>

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	<p><i>undertaken by MEPI. These should be implemented.</i></p>	
	<p><i>The committee remains concerned about the flood risk associated with this project. Quinte Conservation states that this proposal has been reviewed under current 100-year flood plain level assumptions. However, QCA goes on to state that a revised flood plain map is to be introduced in 2022 which will raise the flood plain by 20 cm.</i></p> <p><i>While we understand that the project must be reviewed in the context of existing regulation, the reality is that these homes would remain very vulnerable to flood risk. The GHD hydrogeology report had noted the practical unsuitability of this low-lying property for homes, concerns which we can only assume would be exacerbated by the revised flood plain assumptions.</i></p>	<p>Detailed design drawings will be completed with lot and apron grades above new flood elevation. Jewell Engineering anticipates some of the proposed ditches will be below the new flood elevation due to constraints related to the existing Hennessy Street ditches and the need to ensure positive drainage to the Bay.</p> <p>The Hydrogeological Assessment by GHD dated February, 2020 indicates their professional opinion is that the site is suitable for the proposed five (5) hamlet residential lots and that septic systems will require fully raised beds. GHD further opines that minimal impacts are expected to groundwater and surface water quality as a result of the proposed individually raised septic systems. GHD recommends that good construction and</p>

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		<p>mitigation techniques must be used to minimize the potential for any impact.</p>
	<p><i>We urge staff to consider the liability of the County to any lawsuits arising from the floodplain risks in its deliberations. At the very least the project is a timely illustration of the need to marry existing regulation with dynamic forecast assumptions of future risks as a consequence of Climate Change and the need for stress testing against these assumptions.</i></p>	<p>Detailed design drawings will be completed with lot and apron grades above new flood elevation. Jewell Engineering anticipates some of the proposed ditches will be below the new flood elevation due to constraints related to the existing Hennessy Street ditches and the need to ensure positive drainage to the Bay.</p>
Ministry of Transportation		
<p>Ministry of Transportation Corridor Management Planner August 31, 2021</p>	<p><i>MTO has reviewed the above reports and all ministry comments and concerns have been addressed.</i></p> <p><i>As previously stated, no additional access to Highway 62 will be permitted for access to this subdivision.</i></p> <p><i>These comments are valid for one year from the date of this letter.</i></p>	<p>No further action is required.</p>

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Quinte Conservation		
Stormwater Management		
<p>Quinte Conservation Planning & Regulations Manager October 5, 2021</p>	<p><i>The impervious area of the development is very minor at 0.27 ha. Best management practices including enhance grassed swales, reduced lot grading, vegetated filter strips, 300 mm gravel diaphragm and rock/sand filter will be utilized. Although all drawings were conceptual staff have no concerns with this proposal. Detailed engineering drawings will be required for a final review. Drawings must include the updated topographical information confirming the extent of the 100 year floodplain.</i></p>	<p>Detailed design drawings will be provided for review following Draft Plan Approval.</p>
	<p><i>The municipality should be aware that this office is in the process of completing a Shoreline Management Report for Prince Edward County. This report will include an analysis of the 100 year flood elevation which is expected to increase 20 cm or more. Although this new elevation will not effect the proposed building envelops (since it won't be formally approved until 2022) the increase may alter the proposed drainage strategy.</i></p>	<p>Detailed design drawings will be will be completed with lot and apron grades above new flood elevation. Jewell Engineering anticipates some of the proposed ditches will be below the new flood elevation due to constraints related to the existing Hennessy Street ditches and the need to ensure positive drainage to the Bay.</p>

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Quinte Conservation		
Hydrogeological Assessment		
Quinte Conservation Planning & Regulations Manager October 5, 2021	<i>The letter from GHD indicates that to reduce the phosphorous contribution to the bay, a treatment system (including iron rich and/or mechanical treatment system) would be required. The proponent should provide details on the type of system proposed as well as details on the phosphorous removal.</i>	GHD is of the opinion that a commercially available system, such as Waterloo Biofilter (or equivalent), with phosphorus removal should be considered for the Hennessy Street subdivision. Refer to response letter dated November 22, 2021 by GHD for details on the Waterloo Biofilter system and phosphorus removal.
Quinte Conservation		
Environmental Impact Study		
Quinte Conservation Planning & Regulations Manager October 5, 2021	<i>The report recommends maintaining the vegetation community within the 30 m setback of the PSW. This will conserve the ecological function of the wetland. A reduced setback of 15 m was recommended for a small, isolated wetland under 2 ha. in size as well as from the floodplain of the bay shoreline. The EIS addendum concurs with these setbacks. The report recommends the planting of 100 native trees and shrubs within the 30 m PSW setback to enhance wildlife habitat. Further, the EIS and Addendum recommends that no site alteration occur within 30 meters of the PSW boundary and 15 meters from the small wetland and floodplain with the exception of a 4 meter wide pedestrian</i>	No further action is required.

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	<p><i>pathway from each lot to allow access to the PSW or shoreline. The installation of silt fencing is recommended to not only prevent sediment from entering the bay but stop turtles from accessing the area while under construction. Staff have no further concerns with the EIS.</i></p>	
Environmental Impact Study Peer Reviewer		
General Commentary		
<p>Muncaster Environmental Planning Principal August 31, 2021</p>	<p><i>The requirements for an Environmental Impact Study, as established in Section 2.1.6 of the Provincial Policy Statement and the County Official Plan, are met by the Cambium Inc. EIS. The review of existing information was thorough. Appropriate sources for background information were consulted, including Quinte Conservation mapping, the Natural Heritage Areas: Make-a-map, Fisheries and Oceans Canada Aquatic Species at Risk Mapping, and several wildlife atlases including the Ontario Breeding Bird, and Reptile and Amphibian Atlases. For the first bullet of Section 3.1, it would be helpful to identify the date that the MNRF database was accessed.</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>
	<p><i>Field surveys were completed on five dates from April to June. Breeding bird surveys were completed at the proper seasonal time, though more diverse observations may have been obtained if the terrestrial breeding bird surveys were</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>

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	<p><i>completed more than eight days apart. The vegetation surveys were completed on April 23rd and May 31st. A summer vegetation survey may have yielded more observations but given the generally disturbed nature of the site it is not anticipated this would have changed the analysis. In Section 3.2.2, it would be helpful to confirm staff performing the wetland boundary delineation have completed the Ontario Wetland Evaluation System course, though two of the authors have completed the course, as indicated on the Curriculum Vitae provided in Appendix E.</i></p>	
	<p><i>The vegetation communities are described in Section 4.4 and shown on aerial photography. Additional information would be helpful on species composition, size, and condition for the different vegetation layers. The level of effort for documenting birds and other wildlife usage of the site, including potential Species at Risk, is sufficient for the disturbed site.</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>
	<p><i>Section 5.4, an assessment of fish habitat, should describe the rationale for a 15 metre setback from the Bay of Quinte shoreline. Discussions with the EIS author indicate that Quinte Conservation are in agreement with this setback and that the 15 metre setback for the proposed subdivision is equal to or</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>

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	<p><i>greater than most of the development setbacks along Hennessy Street. On Figure 4, the blue line shown the 15 metre setback from the shoreline does not appear to be the correct distance from the shoreline in the northeast corner of the site, though the 15 metre setback is clearly shown on the Development Site Plan in Appendix A. I see no concerns with a 15 metre setback for the small, unevaluated wetland in the north portion of the site and the 30 metre setback from the PSW is the current standard.</i></p>	
	<p><i>Fish habitat could be included with wetlands in the first bullet of Section 6.0.</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>
	<p><i>I am in agreement with the conclusions of Section 6, Impact Assessment, pending support by Quinte Conservation for the 15 metre shoreline setback within a settlement area.</i></p>	<p>No further action is required.</p>
	<p><i>Section 6.1 indicates that stormwater management for the site should promote infiltration of surface water to promote infiltration of surface water to maintain the local hydrology of the site. This recommendation is definitely suitable but if available at this stage, additional information could be provided on how</i></p>	<p>Refer to Functional Servicing Report Addendum dated November 19, 2021 by Jewell Engineering for detail.</p>

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	<p><i>the stormwater quality and quantity will be addressed for the site and how infiltration will be achieved.</i></p>	
	<p><i>With respect to significant wildlife habitat, I agree that eastern wood-pewee is commonly observed in eastern Ontario and habitat does not appear to be a limiting factor for this species. The turtle component of the project assessment does not include an assessment of Blanding's turtle. This species is identified for the adjacent lands in the Species at Risk screening (Appendix D) and Section 4.7 indicates that the adjacent PSW and Bay of Quinte provide suitable habitat for turtles to forage, bask, and potentially hibernate. In discussions, the lead EIS author indicated that no Blanding's turtle observations are documented within two kilometres of the site and thus the Ministry's General Habitat Description of the species and associated categories of habitat are not applicable. This rationale should be added to the Blanding's turtle description in Appendix D.</i></p>	<p>Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.</p>
	<p><i>I find the mitigation measures reasonable and will provide suitable protection for the adjacent natural features as well as improving components of the existing condition through seeding, extensive plantings, and removal of garbage. Mitigation measures in Section 6.3 with</i></p>	<p>No further action is required.</p>

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	<i>respect to docks and other shoreline considerations are particularly important to protect the Bay of Quinte habitat.</i>	
Environmental Impact Study Peer Reviewer		
Conclusions		
Muncaster Environmental Planning Principal August 31, 2021	<i>I agree with the assessment, recommended mitigation measures, and conclusions of the Environmental Impact Study as described in Sections 6 and 8. Given the disturbed nature of the site, the proposed development would appear to be suitable from a natural environment perspective, provided the adjacent wetland and aquatic habitat can be properly and effectively protected.</i>	No further action is required.
Environmental Impact Study Peer Reviewer		
Recommendations		
Muncaster Environmental Planning Principal August 31, 2021	<i>The Environmental Impact Study is thorough and well prepared. The EIS author has provided additional information on the proposed 15 metre setback from the Bay of Quinte shoreline and the lack of Blanding's turtle observations in the immediate area. This additional information should be added to a revised EIS, though no changes in the current assessment conclusions of the EIS are anticipated.</i>	Refer to Addendum to the Environmental Impact Study dated September 24, 2021 by Cambium for detailed response.

If you have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "S. Legere".

Shawn Legere, MCIP, RPP
Senior Planner / Project Manager
RFA Planning Consultant Inc.

Cc. Georgios and Kyria Georgiou, owner/applicant