



COUNTY OF WELLINGTON

PLANNING AND DEVELOPMENT DEPARTMENT
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N1H 3T9

August 20, 2014

Karen Landry, CAO/Clerk
Township of Puslinch
7404 Wellington Road 34
Guelph, ON N1H 6H9

Dear Ms. Landry:

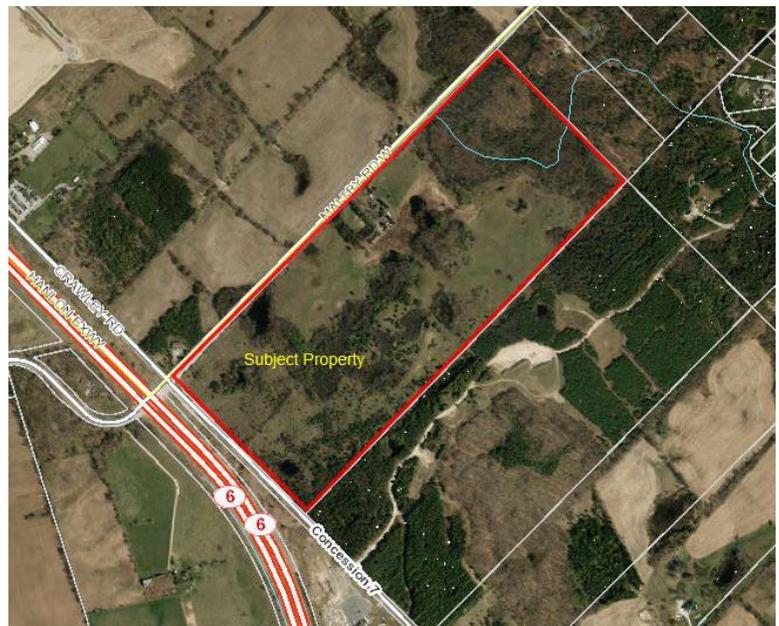
**Re: Zoning By-law Amendment – Application D14/PER
Part Lot 16, Concession 7, Township of Puslinch
424 Maltby Road – Persian Investments Limited
Proposed Industrial Development**

We have received a copy of the Notice of Public Meeting regarding the above-referenced application and provide the following comments for Council's consideration.

Purpose of the Zone Change

The purpose of this zone change application is to permit the development of a portion of the subject land for industrial purposes. If approved, an industrial zoning would provide for the establishment of dry industrial uses and a limited amount of service commercial uses (i.e. uses that do not require significant consumption of water or generate significant quantities of effluent). Natural areas on the property (identified as part of the County OP Greenlands and zoned Natural Environment) will remain unchanged.

At this time, an application to sever the proposed industrial lands from the balance of the subject property (designated Secondary Agricultural) has not been filed. It is our understanding that the owners wish to proceed with a rezoning application and continue to market the property for potential development. If it is necessary to subdivide the property as a result of a purchaser's industrial proposal, an application for consent will be filed at that time.



County Official Plan

According to Schedule A7 – PUSLINCH, the Official Plan designation for the subject 42 hectare (104 ac) property is SECONDARY AGRICULTURAL, RURAL INDUSTRIAL, CORE GREENLANDS and GREENLANDS. The area proposed for industrial zoning is approximately 13 hectares (32 acres) and is within the RURAL INDUSTRIAL, CORE GREENLANDS and GREENLANDS designations. This area of the property is situated on the western end of the property with frontage along Concession Road 7 and Maltby Road. This area of land is currently zoned Agricultural and Natural Environment Zone.

The RURAL INDUSTRIAL designated lands at Maltby Road and Highway 6 are also subject to the policies of Section 9.8.3 of the County Official Plan referred to as the "Puslinch Industrial Policy". These special policies establish the Highway 6 (Hanlon Expressway) area as a secondary industrial area (after the 401/Wellington Road 46 industrial/commercial corridor). It also gives the east side of the Hanlon priority of development over the west side lands. The policy limits land fragmentation pending review and approval of a detailed concept plan is developed in cooperation with the City of Guelph. A preliminary meeting with City staff to discuss the development of the subject land was held in June 2012.

The policies of Section 9.8.3 together with the policies of the Rural Industrial designation support the development of a range of industrial land uses and various service-oriented commercial land uses. The policies promote those land uses which generally require or benefit from sites with access to major roads and locations that provide large rural sites. Complementary commercial uses such as restaurants, professional offices, and automotive uses are also encouraged.

Development Concept

It is proposed that the development of the subject land be located on the southwestern part of the property outside of the Greenlands system. The areas that are currently zoned Natural Environment (NE) Zone at this location are to remain unchanged. Development setbacks to the natural heritage features are to provide additional environmental protection. Site services are individual and private water supply and sewage treatment systems. The proponent has not secured a specific industrial tenant or end user at this time. Instead, a development concept has been prepared and a suggested list of land uses have been proposed in a draft amending by-law prepared by their consulting planners.

Technical Studies and Reports

Technical studies have been submitted by the proponent and include: planning, functional servicing, environmental, geotechnical, and hydrogeological. Comments filed by the Grand River Conservation Authority, dated July 22, 2014, indicate that additional review and site verification is required by the applicant. County staff has reviewed the Planning Justification Report prepared by the GSP Group and we are generally satisfied with the conclusions. However, the report has not addressed agricultural impacts and more specifically compatibility regarding livestock buildings (minimum distance separation requirements). Further, a cultural heritage and archaeological assessment has not been prepared as required by Provincial and County planning policy.

Outstanding Technical Concerns

We would recommend that the applicant: follow-up with additional environmental assessment as required by the Conservation Authority in their July 22, 2014 letter; address the matters we have noted above; and respond to any comments or concerns raised at the public meeting by Council, the public, and peer review comments (at the time of writing this report, comments from the Township's peer reviewer were not available). We would also recommend that County staff and the Township's ecologist review the woodland boundary on the property as suggested by the GRCA.

We trust that these initial comments are of assistance to the Township. This office will provide supplementary comments following our review of any other written submissions and the resolution of outstanding matters.

Yours truly,



Aldo L. Salis, M.Sc., MCIP, RPP
Manager of Development Planning

cc. G. Scheifele, GWS
N. Garland, GRCA



400 Clyde Road, P.O. Box 729, Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 866-900-4722 www.grandriver.ca

July 22nd, 2014

Township of Puslinch
7404 Wellington Road 34
Guelph, Ontario
N1H 6H9

Attention: Kelly Patzer, Development Coordinator

**Re: Zone Change Application D14/PER
424 Maltby Road
Township of Puslinch, County of Wellington**

Thank-you for the circulation of the supporting material for the above noted property. We have reviewed the following information.

- 1) Scoped Environmental Impact Study – Dance Environmental – April 16th, 2014
- 2) Functional Servicing Report – Braun Consulting – April 2014
- 3) Hydrogeology Assessment – LVM – April 1st, 2014
- 4) Preliminary Geotechnical Investigation – LVM – April 22nd, 2014

At this time we would recommend the application be deferred until additional clarification can be provided with respect to Natural Heritage. Please find attached detailed comments below:

Natural Heritage/Wetland

1. The GRCA has mapped a small, unevaluated wetland just east of Concession 7, north of 'Wetland A'. Comments are required in the EIS to provide justification for removal or why the wetland was excluded. Should it be a mapping error, inclusion of the wetland and confirmation of the boundaries and comments on associated buffers would be required.
2. With respect to 'Wetland B', the proposed 15 m buffer illustrated in Figure 6 is not consistent with recommendation #12 in Section 10.0, which states "A 20 m wide buffer, undisturbed by development, is recommended around 'Wetland B' since there are limited ecological features and functions present." Staff are not in agreement with this assessment. Full choruses of spring peeper, wood frog, and gray treefrog were documented in this pond. Therefore, this wetland may meet the criteria for designation as significant wildlife habitat (i.e. specialized amphibian breeding habitat) in accordance with the OMNR's EcoRegional Criteria (Schedule 6E). Consequently, the GRCA believes there is insufficient justification in the EIS to support a 15 metre setback.

3. Figures 6 and 7 are not accurate. 'Wetland A' is currently mapped as an unevaluated wetland by the Ontario Ministry of Natural Resources and Forestry (OMNR) and the GRCA. The status of 'Wetland A' is recommend to be confirmed by the OMNR, Guelph District Office should the proposed 30 metre buffer be reduced.
4. Staff agree that the conifer plantation associated with the woodland should be regarded as significant and zoned (protected) as Greenland. Staff suggest that the boundary of this conifer community is somewhat vague and would recommend the County confirm the woodland boundary.

Engineering

- 5) We find the development concept with use of Low Impact Development practices, such as the proposed use of a green roof, a rainwater cistern and permeable pavement parking areas, to be generally well conceived. We now offer the following comments to assist the preliminary design:
 - a) We note the hydrogeological assessments recommendation to consult a hydrogeological or geotechnical engineer in order to avoid groundwater mounding in low permeability areas. However, we also note that the grading concept appears to use fill to raise grades where this may be a concern. We therefore suggest that any fill be confirmed as suitable by a geotechnical engineer before placement in areas where infiltration is required and where existing groundwater flow paths are to be maintained.
 - b) Given the reliance on maintaining or enhancing existing infiltration rates and overall dispersion, we support the proposed development of a monitoring program as the stormwater management system is detailed.
 - c) We also ask that a salt management plan be prepared and implemented to protect both surface and groundwater quality. Key to this will be monitoring and maintenance of the permeable pavement parking area to ensure that it remains a well-drained system and thus less prone to surface freezing.

Future Consideration

According to Section 6.1.3 of the EIS, the wetland ponds on this site are considered to be groundwater expressions and would represent kettle wetlands which are sustained in part by groundwater contributions. The EIS further notes that runoff also contributes to the water balance within the wetlands, and that depression-focused infiltration likely occurs within the wetlands on a seasonal basis. Proposed water balance calculations for Wetlands A, B, C, and D will be required at the detailed design stage in order to demonstrate that future development will not negatively affect the hydrologic and ecological functions of the wetlands.

A plan review fee of \$2010.00 will be required for the processing of this request. The applicant will be invoiced the fee of \$2010.00.

If you have any questions please feel free to contact the undersigned at 519-621-2763 ext. 2236.

Yours truly,



Nathan Garland
Resource Planner
Grand River Conservation Authority

cc: Attn: Marlene Walker - Persian Investments Ltd., 3900 Young Street, Suite 702, Toronto, ON M4N 3N6

Dance Environmental Inc., 807566 Oxford Rd. 29, RR#1, Drumbo, ON N0J 1G0

Brandon Flewwelling, GSP Group Inc., 201-72 Victoria Street S., Kitchener, ON N2G 4Y9

Tanya Lonsdale, Braun Consulting Engineers, 530 Willow Road, Guelph, ON N1H 7G4

Attn: Vanessa Marshall – LVM, 353 Bridge Street East, Kitchener, ON N2K 2Y5



June 12, 2014
Our File: 112006-11

Township of Puslinch
RR 3, 7404 Wellington Road 34
Guelph, ON N1H 6H9

Attention: Ms. Kelly Patzer

Re: - D14/PER – Persian Investments Limited
424 Maltby Road West, Township of Puslinch

Dear Ms. Patzer:

An application has been submitted for a site specific amendment to Zoning By-law 19/85, to permit uses under the Rural Employment Designation, as listed under County of Wellington OPA #81.

The following documents and drawings were received and reviewed:

- Planning Justification Report (GSP Group, April 2014).
- Hydrogeological Study Report and Preliminary Sewage System Assessment (LVM, April 1, 2014).
- Scoped EIS (Dance Environmental, April 16, 2014).
- Preliminary Geotechnical Investigation (LVM, April 22, 2014).
- Functional Servicing Report (Braun Consulting Engineers, April 2014).

Based on our review, we offer the following comments:

TRAFFIC CONSIDERATIONS

- 1.- Access to the proposed site will be from Concession 7. We note that the proposed entrance does not achieve the minimum 'clear vision' distance requirement of 150 m from the intersection of Concession 7 and Maltby Road. It is therefore recommended that the application be reviewed by the Township Road Superintendent with respect to the proposed entrance.
- 2.- The site will generate significant increase in local traffic therefore it is recommended that a traffic impact assessment report be submitted by the applicant. The traffic assessment should give consideration to traffic patterns, particularly predicted traffic volumes for Concession 7 between the subject site and Wellington Road 34. Improvements to the unpaved section of Concession 7, between the driving range and Wellington Road 34 may need to be reviewed.

PRELIMINARY SANITARY SEWAGE SYSTEM DESIGN

- 3.- The peak sanitary sewage flow rate for the proposed development is estimated to be in the range of 15,000 to 20,000 L/day. The principle source of sanitary sewage is anticipated to be employee washrooms given that the proposed use of the site is a 'dry' industrial use. A sewage system exceeding 10,000 l/day falls under the jurisdiction of the MOE and will require an Environmental Compliance Approval. The allowable nitrate-nitrogen effluent concentration is 4.68 mg/L to achieve the MOE reasonable use criteria of 2.5 mg/L. Tertiary sewage treatment will be required to achieve these effluent objectives, as indicated in the

Hydrogeological Study Report and Preliminary Sewage System Assessment Report. Due to the low percolation rate and high groundwater elevations, a raised leaching bed will likely be required.

POTABLE WATER SUPPLY

4. - Potable water supply for the site will be provided through a drilled well. The well will be located upgradient (west) of the proposed septic leaching bed and will likely be founded in the bedrock aquifer due to the anticipated low capacity of the overburden aquifer. Preliminary water quality samples from the deep overburden aquifer were found to meet the Ontario Drinking Water Quality Standards for health parameters.

FIRE PROTECTION

5. - Fire protection will be provided through an in-ground precast water storage reservoir. The size of the proposed reservoir will be determined at the time of site plan approval. It is noted that a suitable fire route satisfying the requirements of the Ontario Building Code will also need to be demonstrated.

PRELIMINARY STORMWATER MANAGEMENT DESIGN

6. - The existing site contains several wetland areas which contribute to recharge of the deep bedrock aquifer in the area. Use of Low Impact Development (LID) stormwater management practices, which rely heavily on infiltration, are proposed in order to ensure the water balance for the site is maintained to pre-development levels. The overall stormwater management concept incorporates a wetland facility to manage runoff from the proposed paved access driveway, while permeable pavers (with suitable granular bedding depth) is proposed to manage discharge from the parking area during storm events up to and including the 100 year storm. A green roof is proposed to manage peak discharges from the building rooftop, with alternate management practices such as rainwater harvesting or an infiltration gallery for the balance of the 100 year event. It is noted that the detailed stormwater management design submitted to support the site plan application will need to demonstrate how the regional storm event is to be managed.

Based on the building finished floor elevation of 339.5 m it is inferred that the finished grade of the adjacent parking areas will be of similar elevation. The MOE Stormwater Management Planning and Design Manual (2003) requires that the seasonally high water table depth should be 1 m below the bottom of an infiltration trench. The elevation of the shallow overburden aquifer was observed between 334.5 m and 336.3 m therefore the proposed infiltration of water from the permeable paver parking area appears to be feasible. The geotechnical investigation indicates that sub-surface soils on the subject site vary from silt till and sand till to sand and gravel. Localized infiltration rates will vary accordingly. Boreholes in the vicinity of the parking generally indicate sand and gravel soils, however some shallow silt was also observed. This will need to be reviewed in design of the cut/fill and grading works to ensure that soil conditions in the vicinity of the parking area are conducive to infiltration.

SERVICING AND GRADING PLAN

7. - Based on the preliminary site grading concept, it is anticipated that it will be possible to achieve a cu/fill balance for the site. Significant importation of fill is not anticipated. As noted above, consideration will need to be given to soil types and permeability values to ensure the site is conducive to the proposed infiltration strategy.

ADDITIONAL COMMENTS

8. - Lighting and Landscaping Plans will be required at the time of site plan approval.

SUMMARY

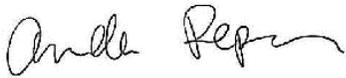
In general, we are satisfied that the proposed land use can be adequately serviced at the site, however we recommend that additional consideration be given to traffic impacts as per the above. Additional details in terms pertaining to fire protection and stormwater servicing may be finalized during the site plan approval process.

If you have any questions or require additional information, please do not hesitate to contact us. -

Yours truly, -

GM BLUEPLAN ENGINEERING -

Per: -

A handwritten signature in black ink, appearing to read 'Amanda Pepping'.

Amanda Pepping, P.Eng.



R.R. 1, Moffat, Ontario, L0P 1J0
Phone: (519) 826-0099 Fax: (519) 826-9099

Groundwater Studies

Geochemistry

Phase I / II

Regional Flow Studies

Contaminant Investigations

OMB Hearings

Water Quality Sampling

Monitoring

Groundwater Protection
Studies

Groundwater Modelling

Groundwater Mapping

Our File: 1410

July 10, 2014

Township of Puslinch
R.R. 3
Guelph, ON
N1H 6H9

Attention: Karen Landry, Clerk

Dear Ms Landry,

Re: Application D14/PER Persian Investments Limited

1.0 Background

We have reviewed the following documents in support of an application for a Zoning By-law Amendment submitted by Persian Investments Limited at 424 Maltby Road West in the Township of Puslinch:

- 1). Planning Justification Report, Persian Investments Limited, by GSP Group, April 2014
- 2) Functional Servicing Report by Braun Consulting Engineers, April 2014
- 3) Scoped E.I.S. by Dance Environmental Inc. April 16, 2014
- 4) Hydrogeology Study Report and Preliminary Sewage System Assessment, by LVM, April 1, 2014

The proposed development is located on a 42 hectare property, of which thirteen hectares are designated Rural Industrial Area in the County of Wellington Official Plan. Less than five hectares are proposed to be rezoned as much of the thirteen hectare parcel is Zoned Natural Environment Zone by the Puslinch official plan. The site is located on Concession 7 and on the south side of Maltby Road. To the north of the site is the city of Guelph and the proposed Southgate Industrial park. The site is located within Wellington County's Paris Galt Moraine Policy Area.

The application is to change the zoning of portions of the site from agricultural to Rural Industrial and some lands that are zoned

agricultural to Natural Environment. The proposed land use has not been defined but may include business or professional offices, dry industrial uses such as manufacturing, processing, fabricating along with service, transportation/distribution and storage.

2.0 Summary of Issues

2.1 Sewage Effluent

1) A localized-perched groundwater system has been identified in the supporting documents. This perched groundwater system supports the local wetlands and is not directly connected to the regional groundwater system. This results in a very localized groundwater flow pattern. It is proposed to discharge the sewage effluent into this local flow system and the studies show that the nearby Provincially Significant Wetland is the likely receiver of the groundwater. With this in mind and an estimated effluent volume of some 20,000 litres per day, the environmental impact to the local wetland should be evaluated with respect to increased volume of hydrologic input, increased nitrogen, increased phosphorous and potential bacteriological increases.

2) The proposed location for the septic system disposal field is at a local groundwater divide. This presents an opportunity for groundwater to move into the adjacent local groundwater catchment area to the south. An improved description of the local system is needed to identify what impacts, if any, could arise from the southerly movement of effluent.

3) Consideration of off-site impacts must be made in the event that the effluent encounters a “window” of permeable material and migrate to the water table.

2.2 Stormwater

The proposed development appears to minimize impacts to the sensitive environmental features on the site. Site development features include permeable pavement in all parking areas to maximize post development infiltration, a green roof on the building for water evapotranspiration, minimal impervious surfaces and buffer zones around wetlands. Although grading will eliminate some of the hilly areas of the site, infiltration areas are being retained and therefore groundwater recharge will be maintained.

4) The reporting does not detail the existing and proposed flow of stormwater at the site. A more detailed discussion on stormwater management is required.

5) A discussion on chloride use with respect to the impact on nearby wetlands is required.

2.3 Water Supply

6) The site will be serviced by a drilled water well and an onsite sewage disposal system. In order to estimate the sewage generation it is assumed that an office building with 263 employees will be constructed. With respect to the well, the documentation simply states that the development will be serviced by one or more private wells and that these wells should be drilled west of the leaching bed and at least 15m from the bed. A review of local well records should be conducted to estimate if sufficient water is expected to supply a development of this magnitude.

3.0 Detailed Comments

3.1 Site Servicing

In order to estimate if the site is capable of supporting an onsite sewage disposal system an estimate of the desired nitrate concentration in the effluent is back calculated to result in a 2.5 mg/l concentration at the performance boundary. The performance boundary is assumed to be the center of the adjacent wetland. Only dilution is used to estimate what the effluent nitrate concentration should be. The calculations suggest that the concentration of nitrate leaving the septic system should be 4.68 mg/l which LVM indicates is possible. If it is estimated that the septic system effluent will recharge the shallow groundwater regime and discharge into the wetland then estimating phosphorus concentrations should be considered as well as nitrate. Some discussion as to the possible quality impacts to the wetlands should be included.

If the septic system is to receive waste from an office building, the vast majority of the sewage will be black water and will therefore have much higher nitrate concentrations than domestic sewage (80 to 100 mg/l – N as opposed to 40 or 50 mg/l – N). Have these high input nitrogen concentrations been taken into account in the statement that reaching levels of 4.68 mg/l N are achievable?

It is possible, given the data presented, that the shallow groundwater in the vicinity of the proposed tile bed flows to the south. The tile bed is located directly adjacent to a groundwater divide shown in the mapping provided by LVM and the reporting indicates that deeper groundwater flows to the south so depending on exactly where the divide is located and whether the septic impacted water flows laterally or down to the deeper aquifer and then laterally, impacts at the property boundary to the south should be considered. Impacts to the on-site wetlands from this increase in the shallow groundwater flow should also be addressed.

Shallow groundwater samples taken at the site along Maltby road show elevated chloride concentrations, likely the result of road salt applied to Maltby road. How will operations at this site ensure that chloride concentrations will not exceed Reasonable Use at the property boundary or affect nearby wetland flora and fauna?

3.2 Storm water Management

The storm water management proposed for the site comprises the maintenance of natural infiltration and storm water runoff to the onsite wetlands and ponds. The only impermeable surfaces that will be created on the site is the entrance roadway. A small stormwater management area is proposed to accommodate runoff from the impermeable surfaces. Permeable pavement will be used on parking areas to allow infiltration, bedding beneath the pavement will allow the accommodation of the 100 year storm. The proponents appear to be committed to using Best Management Practices to ensure that pre-development conditions are maintained. A water balance showing pre and post development runoff and infiltration volumes is not presented.

Mapping showing the existing stormwater flow at both the site and local level is not provided. Proposed stormwater flow is also not presented.

4.0 Pertinent Legislation

Our interpretation of how this development addresses water related components of the Provincial Policy Statement and the Wellington County Official plan are as follows;

4.1 Provincial Policy Statement

The 2014 PPS includes the following policies that are pertinent to the natural features at this site. The policy statement is found in italics followed by our comments.

Natural Heritage

2.1.1 Natural features and areas shall be protected for the long term

Buffer zones around the core greenland areas are being proposed. Only one of the wetland areas is proposed to have a 10 m buffer, the remainder have 15 m buffer zones. The application proposes to rezone the buffer zones as natural environment zones. We defer to Greg Scheifele for comment on the appropriateness of the buffer.

2.1.2 The diversity and connectivity of natural features in an area, and the long term ecological function and biodiversity of natural heritage systems should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

It must be recognized that there is a hydrologic connection between this site and wetlands on the Southgate Industrial Park site. Every spring the water levels rise sufficiently to allow flow to pass northward beneath Maltby Road resulting in inundation of the wetland pocket and also result in infiltration of the meltwater. This natural process must be allowed to continue.

Water

2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by

a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development.

The proponents did not investigate the contribution of the site on a watershed scale. A large scale development has been proposed for the north side of Maltby Road. This development is known as Southgate Industrial Park. There are at least three hydrologic linkages between the Southgate development and the Persian Investments development. Appropriate consideration of the Southgate development should be included in the analysis of this site.

In addition, the location of this site in a regional context has not been presented.

b) identifying water resource systems consisting of ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas, which are necessary for the ecological and hydrological integrity of the watershed;

Features on the site have been identified, however they should be presented within a local groundwater flow and watershed level conceptual model in order to better understand the function of this site within the regional groundwater and surface water systems.

c) maintaining linkages and related functions among ground water features, hydrologic functions, natural heritage features and areas, and surface water features including shoreline areas.

See our response to 2.1.2 and 2.2.1 a).

d) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces

The proposal includes measures to maximize the infiltration at the site and therefore minimize stormwater generation.

4.2 Wellington County Official Plan (adopted OPA 81)

Our comments on Wellington County Official Plan policies are as follows. The Official Plan policy/statement is found in italics followed by our comments.

2.2.24 Our Commitment to the Future

Ensure the quality and quantity of groundwater and surface water are protected as an essential resource for urban and rural water supplies, agricultural production, the maintenance of the Greenland system, and future growth.

Given that there is no proposed off-site stormwater discharge, this development will not decrease the amount of infiltration and therefore the recharge to the shallow aquifer will not be decreased. The transfer of water from the bedrock aquifer by extracting water using a water well and then recharging that water to the shallow aquifer via the septic disposal field will increase the amount of water in the shallow aquifer.

4.6.3 Environmental Impact Assessment

e) a description of the terrestrial and aquatic resources, natural and built landforms, surface and groundwater and other significant environmental features or functions on the site;

It does not appear from the preliminary grading plan that significant alteration of the site landforms will take place. Surface and groundwater and other environmental features are addressed, however, until a final proposal has been determined the ultimate impacts to these systems cannot be assessed.

h) an assessment of the impact on groundwater resources and in particular existing private wells and municipal supply wells in the area;

It is not anticipated that this development will adversely affect nearby private and municipal supply wells, however this possibility has not been addressed directly in the documentation. A survey of private water wells has been undertaken to describe what geologic units are supplying water to nearby homeowners.

i) a statement of the relative environmental and ecological significance of the natural features and functions affected by the proposal;

This site provides an important groundwater recharge function. This function should be preserved and the documentation provided indicates that this function will be preserved.

l) a statement that there are no negative impacts on provincially significant greenland features and functions and a description of the means by which negative environmental impacts will be mitigated in other greenland areas.

It is not anticipated that Greenland features, which are present on the site will be negatively impacted. The use of the bedrock aquifer for water supply should eliminate possible reductions in the water flow to on site wetlands. The septic system will result in local impacts to the groundwater quality. Should this shallow groundwater flow into the nearby wetlands some water quality degradation could occur. We are assuming that these possible impacts will be addressed prior to approval of a septic system for this site.

Monitoring of shallow groundwater quality in the vicinity of the septic system should be conducted to ensure that the development is not having an adverse impact. Mitigative measures should be discussed in case adverse impacts arise.

4.9.3 Groundwater

Specifically, it is the County's intent that the development of public and private uses will not:

- significantly alter groundwater recharge or discharge

It is possible that the addition of the septic effluent to the subsurface will result in an increase in local shallow groundwater recharge and since the discharge zones are in close proximity to the tile bed it is possible that there is an increase in the groundwater discharge to the wetland as well.

- impair groundwater or surface water quality

Shallow groundwater quality in the vicinity of the tile bed may be negatively impacted. Calculations included in this submission suggest that providing the septic effluent is treated to a nitrogen concentration of 4.68 mg/l that the impacted groundwater will meet MOE requirements. Since the shallow groundwater is thought to discharge to the local wetlands, some discussion of the phosphorus generated should be included in the submission.

- Negatively impact municipal groundwater supply.

It is our opinion that the municipal groundwater supply will not be negatively impacted provided that the appropriate groundwater protection policies found within the Wellington County Official Plan are adhered to. The documentation provided supports all prohibitions required for a site found within the WHPA of the City of Guelph well.

Groundwater is not confined to municipal boundaries. As such, the Township should work with its municipal neighbours to ensure effective groundwater protection. Enforcement of the groundwater protection policies found within the Wellington County Official Plan is an effective method of ensuring groundwater protection.

4.9.4 Policy Direction

Wellington County commits to pursuing the following directions relating to water resources:

a) ensure that land use planning contributes to the protection, maintenance and enhancement of water and related resources and aquatic systems on an integrated watershed management basis;

Further analysis should be provided to estimate the possible water quality impacts on the local wetlands should the impacted groundwater from the septic system discharge into the wetlands. Additional consideration of the development of the City of Guelph lands should be included in the analysis.

b) protect surface and groundwater quality through the use of regulatory and voluntary means of prohibiting, restricting or influencing land uses and activities within wellhead protection areas and overlying vulnerable aquifers;

Although this development is located at the edge of the WHPA D zone for the city of Guelph water supply wells, the proposed types of developments should not result in negative impacts to the city water supply

c) ensure that development meets provincial water quality objectives;

The possibility of impacted groundwater from the septic system entering the onsite wetlands should be addressed.

d) ensure levels of wastewater treatment that are appropriate for the size, location and scale of development anticipated;

Documentation states that appropriate wastewater treatment will be provided, this treatment has not yet been designed.

e) ensure development does not alter groundwater levels to the detriment of surrounding users and resources;

It is possible that the large volumes of water that will be added to the shallow groundwater regime from the wastewater disposal system will result in increased recharge to the onsite wetlands. The proponent should address if increases in recharge to these ponds will negatively impact their function.

f) support policies to protect municipal water sources;

This can be achieved by the Prohibition of Category A, B and C activities at the site which are not being proposed at this time.

g) protect wetlands and areas that make significant contributions to groundwater recharge;

There is the potential for groundwater recharge changes beneath this site, including a Provincially Significant Wetland. Appropriate groundwater monitoring and contingency plans are necessary to meet this policy.

h) protect the hydrogeological functions of the moraine systems in the County;

The hydrogeological functions of the moraine system will be protected by this development provided that site grading and water infiltrations systems remain as proposed.

i) ensure the base flow needed to protect streams, fisheries and wetlands are maintained;

Base flow will be enhanced if altered by this development.

j) support stormwater management systems that protect water quality and quantity;

Proposed stormwater management systems and an apparent commitment to using best management practices at the site should ensure that stormwater management systems do not negatively impact water quality and quantity.

k) maintain and enhance water quantity and quality through the retention of vegetation or through revegetation;

This issue is best addressed by other reviewers.

l) maintain and enhance fish habitat;

This issue is best addressed by other reviewers.

m) protect or enhance the function of sensitive groundwater recharge areas, discharge areas, aquifers and headwaters;

Measures are included in the proposal to protect groundwater recharge and discharge areas. Some discussion of the possible increase in groundwater discharge due to the amount of treated septic effluent being added to the shallow groundwater regime should be included.

n) ensure land use decisions promote water conservation efforts and support the efficient use of water resources;

Water conservation efforts should be included as part of the office development plan. The possibility of reusing stormwater has been put forward in the documentation.

o) encourage agricultural practices that protect water resources;

Not Applicable.

p) require mineral aggregate operations to use best management practices to protect groundwater resources as set out in Section 4.9.5.8;

Not applicable

q) require impact studies when development proposals have the potential to affect water or water related resources;

Potential impacts have been delineated by LVM, however further discussion of the potential changes to the shallow groundwater regime that could result from the addition of the septic effluent should be discussed.

5.6.3 Development Impacts

Where development is proposed in the Greenland system or on adjacent lands, the County or local municipality shall require the developer to:

a) identify the nature of the natural heritage resource(s) potentially impacted by the development;

The natural heritage features potentially impacted by this development have been identified.

b) prepare, where required, an environmental impact assessment to address potential impacts;

A groundwater monitoring plan and contingency plan should be proposed to address potential impacts. This plan should be provided prior to rezoning.

c) consider enhancement of the natural area where appropriate and reasonable;

Enhancement has not directly been proposed, however efforts to protect natural resources and use Best Management practices to minimize impacts are being proposed.

d) demonstrate that there will be no negative impacts on the natural heritage resources or feature or on its ecological function.

A groundwater monitoring plan and contingency plan should be proposed prior to re-zoning.

Sincerely,

Harden Environmental Services Ltd.



Stan Denhoed, P.Eng., M.Sc.
Senior Hydrogeologist



File: 3226
By: Email & Mail

August 22, 2014

7404 Wellington Road 34
R.R.#3
Guelph, ON
N1H 6H9

Attention: Mrs. Karen Landry
CAO/Clerk

Dear: Mrs. Landry

**Re: Zoning By-law Amendment Application D14/PER
424 Maltby Road
Part Lot 16, Concession 7, Township of Puslinch**

As requested, I have reviewed the Scoped Environmental Impact Study prepared by Dance Environmental Inc. in support of Persian Investments proposed industrial development at 424 Maltby Road. I also examined the Hydrogeology Study Report prepared by LVM and Functional Servicing Report prepared by Braun Consulting Engineers.

The subject property is 42 ha in size and it has frontage on Maltby Road and Concession Road 7. The County's Official Plan designates the property as Secondary Agricultural, Rural Industrial, Core Greenlands and Greenlands. The area proposed for industrial zoning is situated at the west end of the property and covers about 13 ha. It lies within the Rural Industrial, Core Greenlands and Greenland designations and is currently zoned Agricultural and Natural Environment Zone. For development to proceed at this site the Township's zoning by-law would have to be amended to an appropriate industrial zoning. At present, the proponent has not determined a specific industrial use but has identified a proposed development concept for a variety of potential land uses with driveway access off Concession Road 7. No intrusions are proposed into the Greenlands system and development setbacks have been applied to natural heritage features to provide additional environmental protection. Private sewage treatment and waste supply systems are assumed.

Based upon my review of the available documentation, I offer the following comments on the EIS and proposed industrial use of this site.

1. The vegetation and wildlife inventories appear to be thoroughly carried out in a manner consistent with generally accepted standards. However, the air photo base map provided in Figure 2 indicates that a large meadow community (MEMM3) contains areas with much

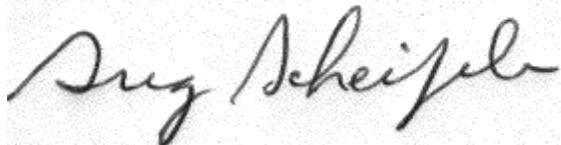
woody growth and this suggests that these areas should either be combined with adjacent woodland communities (e.g. FOCM6-3 and SWTO2-3) or be identified as a separate successional community. This needs to be confirmed by a site inspection since this matter has Greenland implications which could affect the development concept.

2. On page 57 Dance states that an updated EIS should be prepared during detailed design for a specific industrial use. I agree with this recommendation but suggest that an Addendum report may be adequate depending upon the extent of deviation from the development concept now proposed.
3. On page 57 and 58 there is a discussion about the use of a 15 to 20 m buffer around wetland B. It is presented in a somewhat confusing manner. Since this wetland feature is of low quality I suggest this issue can be simplified by establishing a 1 m setback from the dripline of existing mature trees. This would result in an easily recognized buffer that varies from about 10 to 30 m in width.
4. On page 58 I have concerns with the suggestion that no effort should be made to control highly invasive alien species such as common buckthorn, tartarian honeysuckle and garlic mustard, all of which have been reported on the subject lands. I have achieved good success on implementing control measures where populations are relatively low and appropriate control measures are implemented over two or more years. However, where these invasive species have become very abundant and there is not a good diversity of native plants available to compete with these weeds attempts to eradicate or control the spread of the undesirable species could prove too expensive to implement. In these extremely disturbed communities there may be no practical solution to restore them to a more natural and ecologically desirable condition. I will defer my comments on this matter until I have the opportunity to inspect the property.
5. On page 59 I agree that a Tree Saving and Vegetation Management Plan should be prepared as a condition of Site Plan approval.

In summary, the proposed industrial use of this site seems reasonable from a natural environment perspective subject to the resolution of Greenland concerns identified above. Please do not hesitate to contact me if further clarification is required on this matter.

Yours truly,

GWS Ecological & Forestry Services Inc.



Greg W. Scheifele, M. A., R.P.F.
Principal Ecologist/Forester

cc: Aldo Salis, County of Wellington
Stan Denhoed, Harden Environmental Services
Nathan Garland, Grand River Conservation Authority

August 25, 2014

Karen Landry,
CAO/Clerk
Township of Puslinch
7404 Wellington Road 34
Guelph ON N1H 6H9

Via email

Dear Ms. Landry,

RE: File# D14/PER – 424 Maltby Road West

Thank you for circulating the notices of complete application and public meeting for the above noted file. The City has an interest in this application and comments are forthcoming.

Sincerely,



Tim Donegani
Policy Planner
Planning Services
Planning, Building, Engineering and Environment
Location: 1 Carden Street

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TTY 519-826-9771

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MNR – Species at Risk review

Hi Ken,

In my opinion if Jefferson salamanders were breeding at this site the survey methodology described should have captured some of the individuals. The negative results suggest to me that Jefferson salamanders are not breeding at this location. Please let me know if you require any further assistance.

Graham Buck
Management Biologist
Ministry of Natural Resources
1 Stone Road West
Guelph ON
N1G 4Y2
519 826 4505
graham.buck@ontario.ca

Attached below, please find the comments from MNR on Species at Risk and the EIS:

The Eastern Small-footed Bat was listed as Endangered on June 27, 2014. The 2013 data found this bat species at our monitoring stations Bat 3 and Bat 3B. These stations are located to the north and east of the areas proposed for development in the current concept. Approximately 100m of dense wetland separates the development area from the Small-footed Bat locations recorded in 2013.

Regarding Graham's comment on more survey effort to satisfy their current protocol, this could be done as part of the detailed design environmental studies.

Regarding the Eastern Wood-Pewee, in late June 2014 it was added to the Endangered Species Act, as a Species of Special Concern. Graham is asking that text be added to the EIS to address the habitat of this species, now that it has status. Such text can be prepared by us.

Please be aware that the Eastern Wood-Pewee was not found within the lands that have a rural industrial designation, but rather in the 120m off site/other lands that were inventoried.

Regards,
Ken Dance, M.Sc.
President
Dance Environmental Inc.
807566 Oxford Rd. 29
R.R. #1, Drumbo, ON N0J 1G0
Tel: 519-463-6156

Hi Ken,

I have reviewed the EIS for 424 Maltby Road. Since the report was prepared by the time the results of the last round of COSSARO assessments had been released I recommends the report be updated to reflect the addition of two species to the SARO that were documented during field work:

Eastern Small-footed Bat
Wood Pewee

The Eastern Small-footed Bat was detected twice, which may indicate it was using the area of the property around bat station 3 as a maternal roost. It is my understanding this area is not going to be developed. Typically MNR lieks to see more than 2 surveys and all occurring in June, to provide a clearer picture of the presence of maternal roosts.

I also recommend the section of the report on significant wildlife habitat should be updated to reflect the presence of eastern Wood-pewee.

Graham

Graham Buck
Management Biologist
Ministry of Natural Resources
1 Stone Road West
Guelph ON
N1G 4Y2
519 826 4505
graham.buck@ontario.ca

Township Of Puslinch Transportation comments:

- Under Township by-law 36/13 heavy vehicles(excess of 4.6 tonnes) are not permitted on Concession 7 between Maltby Rd and Wellington Rd 34
- Any heavy vehicles accessing this location would only be permitted to travel to and from Maltby Rd, access to #34 would not be permitted.
- Should the owner/developer wish to be able to access #34 then Concession 7 would have to be designed and constructed to engineering standards, all costs for this process would be the responsibility of the property owner/developer

Don

Don Creed CRS-S
Director of Public Works and Parks
Township of Puslinch
519-763-1470
dcreed@puslinch.ca

Township of Puslinch Fire Department Comments:

Fire department has no concerns.

Thanks,

Steven Goode
Fire Chief
Puslinch Fire and Rescue Services
Cell (519) 546-9029
Office (519) 821-3010
Sgoode@puslinch.ca

Please note the following First Submission comments are still expected:

Utilities

MTO

City of Guelph