Puslinch - Estill Innovation Community, Comment/Response Matrix

Our File: 22451A
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#	Comment	Response
	County of Wellington Planning	
1	There is a related Official Plan Amendment Application that has been submitted (OP-2025-01) that has not yet been deemed complete, but note that County Planning Staff will provide detailed comments through that process including the need for any additional studies and/or signed versions of the submitted plans	Noted.
2	We recommend coordinating deeming the application complete with the County Planning Office	Noted.
3	We will share a copy of the acknowledgement letter for OPA once it is issued.	Noted.
4	It is noted that a hydrogeological assessment was not submitted. The functional servicing report references a Hydrogeological Assessment, and a Water Supply Analysis was submitted. A Hydrogeological assessment is required to address the policies of section 4.9.7 and 4.10., and 4.9.5.6 of the Official Plan. The Township's Hydrogeology Consultant's comments should be considered.	The Hydrogeological Assessment is contained as an Appendix to the EIS.
5	Elevation Drawings and a compatibility assessment were also not submitted	Renderings were provided in lieu of elevations. Elevations will be provided at the site plan stage. A compatibility assessment is included with this resubmission.
	Township of Puslinch Building Department – Andrew Hartholt, CBO	
1	Application is complete – From a building code perspective	
2	No additional requirements	
3	Technical comments - The following information is to be provided in detail if the applicant will proceed to the site plan application stage: a) An Ontario Building Code (OBC) matrix for each proposed building	

	b) Building Height and storeys proposed for each building. c) Provide preliminary spatial separation calculations between buildings and property lines d) Conceptual Elevations and Floor Plans of Proposed Buildings e) Hydrant location(s). OBC B.3.2.5.7. to be located within 90 meters of every portion of a building perimeter that is required to face a "street". f) Show designated fire routes. g) Principal entrances to buildings to be identified. h) The new building code requires that all pedestrian entrances be accessible. Accessible walkways should be provided to lead from accessible parking areas to all pedestrian entrances. i) Sizing, calculations and location of on-site water storage to meet OBC. j) Full extent proposed septic system, including detailed calculations. These calculations need to align with the proposed buildings and uses. MECP approval will be required as the flows exceed 10,000L/day. k) Identify snow storage locations l) Roof drainage flow control does not appear to be used. If thischange occurs before the final site plan submission, please highlight it in the stormwater report, as it will impact the structural design of the proposed building(s). m) Provide engineer details for any retaining walls proposed.	
NPG Planning Solutions		
	Requirements for complete application	
1	**Land Use Compatibility Study** Section 6.8.3 of the County Official Plan indicates as follows:	A Compatibility Assessment is included with this submission.

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	In Rural Employment Areas, establishing specific areas for detailed land use regulations is normally left to the Zoning By-law. In establishing zones and considering rezoning applications, Councils shall ensure that existing and proposed uses are compatible, and that sensitive uses are adequately separated from industrial uses. The Zoning By-law may also limit the location and size of commercial uses. Pre-consultation notes indicate the requirement for a Compatibility Assessment that considers noise and dust impacts, including the MOE-D Series Guidelines due to proximity to sensitive land uses	
2	**Minimum Distance Separation Formulae (MDS I)** The Minimum Distance Separation Formulae (MDS) analysis needs to be included. This requirement is identified in Section 6.5.7 of the County Official Plan.	An MDS Analysis is included with this submission.
3	**Archaeological Assessment** Pre-consultation notes indicate the requirement for an Archaeological Assessment.	An Archaeological Assessment is included in this submission.
1	For information, the Puslinch By Design: Employment Lands Study ("Puslinch By Design") is being undertaken in partnership with the County of Wellington and the Township of Puslinch to identify a minimum of 30 additional hectares of land for 3 rural employment growth. The Subject Lands have been considered as part of Phase 4 of the study. Phase 4 of the study has identified strengths and weaknesses for accommodating rural employment uses on the Subject Lands.	Noted
2	The Township of Puslinch has urban design guidelines related to industrial buildings, landscaping and parking areas. The Urban Design Brief should be revised to reference and analyze these guidelines.	An updated Urban Design Brief is included with this submission.

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3	The Concept Plan should be revised to address/include the following items: a. Include a zoning matrix addressing all applicable zoning provisions; b. Provide the net floor area of each building in order to confirm the required number of vehicle parking, loading spaces and bicycle parking spaces; c. Identify the location of the barrier free parking spaces; and Include the legal name of the Subject Lands	A zoning matrix is included with this submission. It was included in the planning justification report and has now also been as a standalone document and added to the concept plan. The net floor area for each building will be provided at the site plan stage. The site plan submitted is conceptual only, with building detail to be confirmed. Through the site plan process, parking and loading arrangements (including the number of spaces, type and their location) will be confirmed. The proposed zoning by-law amendment does not request a reduction to the number of parking, loading or bicycle spaces and as such, the site plan will be designed to satisfy the parking requirements of the zoning by-law. The legal name of the owner has been added to the concept plan.
4	It should be noted that "Wholesale" is not a permitted use included in the Industrial Zone. If the applicant wants to permit this use, it should be added as a Site-specific exception to the draft Zoning By-law.	This has been added to the draft site-specific zoning by-law amendment
	GEI Consultants	
	Additional Documents Required All plans and studies required from an engineering perspective have been submitted to support the Official Plan Amendment and Zoning Bylaw Amendment applications, and additional documents are not required. GEI would like to review Grand River Conservation Authority (GRCA) and Ontario Ministry of Transportation (MTO) comments when available	Noted.
	Technical Comments - Deficiencies/Outstanding Matters	
1	**Functional Servicing Report**	Acknowledged.

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	Sewage Quality and Quantity Assumptions GEI Comment (March 28, 2025). The Functional Servicing Report assumes that any industrial grade wastewater that is generated will be hauled offsite. Additional discussion with the Township Planning Team is required to determine if this is sustainable in the long term and if this needs to be addressed in the zoning bylaw amendment.	
2	*Fire Water Storage Tanks* GEI Comment (March 28, 2025). Ultimately, as the fire servicing design is progressed, it would be helpful to provide a summary table of the fire water tanks in the Functional Servicing Report, outlining which tanks are intended to service each building	Acknowledged, please see the revised Functional Servicing Report. Note that the watermains connect all fire cisterns besides the one for the daycare, such that the volume from all tanks contributes to the overall demand.
3	**Stormwater Management Report** *General Site Information* GEI Comment (March 28, 2025) The final paragraph of Section 2.2 should be updated with the most recent groundwater level information.	The groundwater level information is obtained from the latest Hydrogeological Assessment Report prepared by GHD (February 2025). Groundwater level information remains consistent for MW12-23, as per Section 2.2 of the SWM Report in the previous information.
4	*Rainfall Parameters* The IDF parameters listed on the Storm Sewer Design Sheet do not appear to be correct. Please provide a table that summarizes IDF parameters in Section 4.0 of the Stormwater Management Report.	A description of the IDF parameters and a summary table (Table 4) are provided in Section 4 of the SWM Report. IDF Parameters have been updated on the storm sewer design sheet.
5	*PCSWMM Model* Please provide PCSWMM model outputs for all the storm events modelled. Appendix C currently only provides modelling outputs for the 100-year storm event.	PCSWMM model outputs for all storm events have been included in Appendix C.
6	*Sediment Drying Area*	A sediment drying area has been provided west of the SWM pond near the proposed cul-de-sac. Refer to Drawing SS102 for details.

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	Please consider the inclusion of a sediment drying area as per Table 4.6 in the MOE SWMP Manual (2003)	
7	*Permanent Pool Volume* The Stormwater Management Report describes the pond as a "conventional wet pond" and Section 5.2.1 states that 172 m3 /ha of permanent storage is required for 66% imperviousness. However, Table 3.2 in the MOE SWMP Manual specifies 190 m3 /ha for 55% imperviousness to achieve 80% TSS removal using a wet pond. Please revise and clarify.	Table 3.2 of the MOE SWMP specifies the combined permanent pool and extended detention volume requirement for the SWM Pond. The required permanent pool volume is obtained by interpolating figures between 70% and 85% imperviousness, which are 225 and 250 m3/ha, respectively, then subtracting from the required extended detention volume, which is 40 m3/ha. As such, 190 m^3/ha of permanent pool storage is calculated to meet the permanent pool requirements for 66% imperviousness, aiming to achieve 80% TSS removal.
8	*Pond Slopes* Section 5.1.4 of the Stormwater Management Report states that the side slopes of the proposed pond are 4:1. However, Table 4.6 in the MOE SWMP Manual recommends 5:1 for 3 m on either side of the permanent pool in wet ponds. Please revise	Per Table 4.6 of the MOE SWMP, the minimum criteria of the pond side slope is 5:1 for 3m on either side of the permanent pool for wet pond design, with a maximum side slope of 3:1 slope to the bottom of the pond. From an elevation that is 3m away from the permanent pool, the side slope to the top of the pond is 7:1.
9	*Pont Freeboard* Section 5.1.4 of the Stormwater Management Report states that the pond is designed to achieve 0.30 m freeboard. Based on the values provided in Table 4 (100-year water elev. at 332.86 m and top of pond at 333.12 m), the freeboard is only 0.26 m. Please revise	The top of the pond has been raised to 333.16m, keeping the 100-year water elevation at 332.64m, to provide a minimum 0.3m freeboard. Refer to Drawing SG102 for details.
10	*Pond Outlet Orifice* Section 5.2.2 of the Stormwater Management Report describes a 375 mm orifice size for the pond outlet, while the drawings show a 300 mm diameter headwall opening and outlet pipe. Please ensure the report is consistent with the calculations and drawings.	A 375mm orifice is proposed at the SWM pond outlet (as described in Section 5.2.2 of the SWM Report); descriptions in the drawings have been updated accordingly. Refer to Drawing SS102 for details.

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11	*Forebay Design* Section 5.3.2 states that a 3.0 m deep forebay is provided, whereas the drawings indicate that the bottom of the forebay is at an elevation of 329.67 m and the top of the submerged berm is at an elevation of 331.67 m, which results in a 2.0 m deep forebay. Section 5.3.2 should be updated with the correct berm elevation to match the drawings. Please provide calculations of settling length, dispersion length, flow velocity and settling velocity, a	Section 5.3.2 of the SWM report has been updated to describe that the proposed forebay will be 2.0m deep. Calculations for settling length, dispersion length, flow velocity, and settling velocity have been included in Appendix A.
12	*Infiltration System Configuration* The infiltration system/Low-Impact Development (LID) elevations and drainage areas listed in Table 8 in the Stormwater Management Report are not consistent with the LID calculations and the drawings. Also, the calculations describe LID#3 as a "Landscaped Storage Tank" and the building areas in Table 12 of Appendix D "Water Balance Assessment" appear to be incorrect. Please confirm that the LIDs are located 1 m above groundwater levels based on the latest hydrogeological assessment, and ensure that LID configurations are consistent across reports, calculations and drawings	LID calculations and the site servicing drawings are updated to ensure information are now consistent between the report and drawings. An extra column is added to Table 8 to indicate that LIDs are located at least 1.0m above the estimated groundwater levels based on the latest Hydrogeological Assessment Report prepared by GHD (February 2025).
13	*Infiltration System Quality Control* Section 5.4 of the Stormwater Management Report states that the infiltration systems only collect roof drainage, however, LID #5 and #6 appear to also collect surface runoff. Only landscaped areas appear to drain to LID#5 but LID#6 collects runoff from asphalt parking/driveway areas. Please revise or provide quality control calculations to ensure 80% TSS removal as LID#6 outlets directly to the wetland.	Section 5.4 of the SWM report has been revised to show that both LID#5 and #6 will receive drainage from both roof and landscaped areas only. The PCSWMM model has also been updated to exclude any parking/driveway areas drainage into LID #6. Please note that these are preliminary grading where only drainage from roof and landscaped areas will be routed into the LIDs in the final design. As a result, water quality control for LID#5 and #6 is not anticipated.

14	*Water Balance Assessment*	The Water Balance Assessment provided in Appendix D has been updated.

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	As the design progresses, please ensure that the Water Balance Assessment provided in Appendix D remains consistent with the remainder of the Stormwater Management Report. There appear to be small inconsistencies throughout	
15	*Drawdown Times* Please provide drawdown times for the SWM pond and infiltration galleries	Section 5.4.1 of the SWM report has been updated to include the drawdown times for both the SWM Pond and the proposed infiltration chambers/trenches (refer to Table 10).
	Grading and Servicing Plans	
16	*GRCA Regulation limit* Please show and label the GRCA regulation limit on all drawings	Acknowledged. A label has been included on all drawings that notes "GRCA Regulation Limit".
17	*Maintenance Road Access* Please label the width of the maintenance access road on the drawings. Ideally, the access road should be at least 4 m wide to allow maintenance vehicles to maneuver around the pond.	Acknowledged. The maintenance access road has been widened around the pond to a 4m width. Labels have also been added to illustrate this width.
18	*Drainage Area Linework* It is difficult to differentiate between drainage boundaries and other linework on drawings STM101 and STM102. Also, the overland flow arrows appear to be missing. Please update the drainage boundary linework and add overland flow arrows. It would also be helpful to see total roof areas labelled on servicing and drainage plans, similar to how the F.F.E is labelled on the grading plans	Acknowledged. Drainage boundaries on STM101 and STM102 line thickness have been increased for better visibility. Overland flow arrows have been shown on both STM101 and STM102. The total roof area (T.R.A) has been labeled on the storm drainage and servicing plans.
19	Storm Drainage Area Plan #2 shows a septic system area of 1,800 m² and an available cistern area of 4,346 m². Since the entire septic system area appears to be 4,346 m², the available cistern area is less than this. It should also be noted that the stone area	Acknowledged. Please note that the 4346 m2 is the available area for the septic bed. The size of the septic bed will be revised at the detailed design stage; however, based on the anticipated population and soil percolation rate, the entire septic system is expected to have an area of only 1,800 m².

	has been preliminarily calculated as 1800 m2, but the sand area would be 3375 m2 based on those assumptions	Therefore, there is sufficient available area in the septic bed location to service the site adequately.
	Site Plan	
20	*Gross Construction Areas* Please provide the gross construction area in square metres rather than, or in addition to, square feet on the Site Plan	The concept plan has been added to show the GCA in square metres.
	Functional Servicing Report, Stormwater Management Report	
21	*Inconsistencies* Please address the following inconsistencies in the Functional Servicing Report: a) Section 3.4 states that 14 tanks are proposed, while the drawings show 15 tanks. Please address the following inconsistencies in the Stormwater Management Report: b) Table 1 describes each catchment as 25% impervious, and this appears to have been used in the PCSWMM model. However, the drawings show runoff coefficients of 0.25. c) Section 5.1.1 states that a runoff coefficient of 0.90 is assigned to pervious areas, while the calculations use 0.25. d) Section 5.2.2 states that an emergency spillway is proposed at elevation	The cistern inconsistencies have been addressed. Table 1 of the SWM report has been updated to 7% imperviousness, which is equivalent to 0.25 runoff coefficient. Section 5.1.1 of the SWM report has been revised to show a runoff coefficient of 0.25 is assigned to the previous area. Section 5.2.2 has been revised to show that the emergency spillway is proposed at an elevation of 332.86 m.
	Harden Environmental Services Ltd.	
	Determination of Completeness	
1	It is our opinion that the application is incomplete insofar as the testing for drinking water quantity and quality has been recommended by the applicant's consultants but has not been conducted. We agree with the recommendation to test the underlying aquifer for its quantity and quality of groundwater. It is our opinion that this could be set aside to a later stage of the application process.	Acknowledged, to be addressed at the site plan stage.

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	The application is incomplete regarding a door-to-door well survey for local residents adjacent to the site that could be impacted by water quality deterioration from the septic system or water taking for the development. This can be addressed at a later stage of the development application process.	Acknowledged, to be addressed at the site plan stage.
	The application is incomplete insofar as a detailed assessment of water quality impacts on groundwater has not been presented for either the septic system or the infiltration of impacted stormwater.	Acknowledged, to be addressed at the site plan stage.
3	**Technical Comments**	
	Water Supply	
1	We would like acknowledgement by the applicant that any water wells drilled at the site will be fully cased to the lower aquifer if an adequate water supply cannot be obtained from the overburden or Guelph Formation aquifer. There should not be any wellbores open to both the Guelph Formation and the Goat Island/Gasport aquifer.	Acknowledged
2	We concur with GHD that appropriate testing of a minimum of two wells should take place to ensure that off-site interference with existing wells will not occur	Acknowledged
3	A private well survey of residences adjacent to the site should be undertaken to confirm that there is adequate drawdown available in private wells when the development is taking water.	Acknowledged. This will be addressed at the site plan stage.
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4	The sewage disposal report from GHD addresses the potential impact of nitrate by recommending a sewage treatment system that reduces nitrate levels to 2.5 mg/L. It should be clarified if this is total nitrogen or nitrate.	The recommended sewage treatment system reduces nitrates not total nitrogen.
5	The water table elevation is shown as occurring between 335.5 and 335.0 m AMSL in the vicinity of the septic field. It should be confirmed that there is adequate separation between the proposed disposal tiles and the water table.	The nearby grades are 338.30 m ASML at the septic field location. The total depth of the septic bed is typically about 1.2m to 1.5m, including the topsoil layer, suggesting that, in a worst-case scenario, the bottom of the bed elevation would be 336.8 m ASMSL, which still provides at least 1.3 m of separation from the bottom of the sand layer. This suggests adequate separation between the disposal tiles and the water table.
6	It must be confirmed that there are no downgradient wells within 200 metres of the septic field. A well survey of private wells within 500 metres downgradient of the septic system should be undertaken. There is a concern regarding emerging chemicals of concern with respect to downgradient wells.	Acknowledged.
	Hydrogeology	
7	Groundwater flow is consistent with those found at the proposed development on the east side of the Hanlon Expressway, however, there is poor or incomplete understanding of the position of the water table particularly with respect to the onsite wetland.	Section 4.2 of the report has been revised to clarify the relationship between the wetland surface water and the groundwater table.
8	Based on topography mapping found in the Functional Servicing Report, the wetland has a base elevation of approximately 331 m AMLS and water table contours indicate a groundwater elevation of 334. Are there 3 m of water in the wetland at times?	The groundwater elevation contour drawing (Figure 4.5) has been revised to avoid indicating that the groundwater level in the area of the wetland is 334 mAMSL. A surface water level of 3 m above ground surface has not been observed.
9	The hydrograph for Station SW1 shows that following significant rainfall in July, the pond rose by approximately 30 cm and took two months to recede. Following the surface water at SW-1 receding below the ground surface after Sept 5, 2024 (or so),	The groundwater elevation contour drawing (Figure 4.5) has been revised to avoid indicating that the groundwater level in the area of the wetland is 334 mAMSL.

	the groundwater at MP1 continues to rise and indicate discharging groundwater conditions to the wetland. Assuming a ground elevation of approximately 331.58 m AMSL for the stations, the wetland ponded surface attained a maximum elevation of approximately 332.08 m AMSL. On May 14, 2024, groundwater monitor MW10-23 had a water table elevation of 334.11 m AMSL. At the same time, the hydrograph made for station SW1 shows the surface water in the pond to have an elevation of approximately 331.88 m AMSL. Furthermore, at the same time, the groundwater mini piezometer MP1 suggests a groundwater elevation below the base of the wetland. The relationship between surface water and groundwater in the wetland is not well understood. The hydrogeology report is silent on the relationship of groundwater to surface water, and yet on May 14, 2024 the contours of the water table suggests a groundwater elevation of approximately three metres above the base of the wetland. The wetland appears to be an important feature of the post-development water balance, as both stormwater (during major events) and roof leader water are proposed to be directed to the wetland. The wetland will not function as an infiltration area if the groundwater levels exceed the surface water elevation. A clearer understanding of the relationship of the wetland surface water to the groundwater system is warranted.	The groundwater elevation hydrographs (Appendix D) have been corrected. A cross-section through the wetland area has been provided (Figure 4.3) Section 4.2 of the report has been revised to clarify the relationship between the wetland surface water and the groundwater table.
	Groundwater Quality	
10	It is our observation that the groundwater sample obtained from MW10-23 has elevated concentrations of total aluminum, phosphorus, chromium, copper, iron, and zinc. Unless historical on-site activities impact the shallow groundwater, it appears to us that an	A preserved, unfiltered sample was analyzed for total metals. A separate filtered and preserved sample was also analyzed for dissolved metals. A review of the analytical data for the filtered sample indicates that concentrations of dissolved metals are below the PWQO criteria.

	unfiltered and preserved groundwater sample was submitted for analysis. This should be confirmed to identify the potential source of the elevated metal concentrations	
11	It is not clear why the chloride concentration is as high as it is recorded. Is this from road salt at Sideroad 20N?	The concentration of chloride in MW10-23 was 8.97 mg/L, which is generally not considered high.
	Functional Servicing Report	
12	The main developable area of the site is internally drained, characterized by depression-focused recharge, which largely occurs through the on-site wetland. In essence, there is no future off-site discharge of runoff from the parking lot and sidewalks. It is likely that the future runoff will be impacted by salt and other chemicals, with recharge to the underlying aquifer being the only avenue of migration of water from the site. An appropriate impact assessment for water quality will have to be undertaken to confirm that a) there are no private wells immediately downgradient of the proposed infiltration areas and b) that the groundwater will meet Reasonable Use criteria	The proposed stormwater management pond is designed to achieve 80% removal of total suspended solids prior to discharging water into the existing wetland. A further water impact assessment will be carried out to confirm during the site plan application.
	Water Balance	
13	The site-specific and feature-based water balances play a crucial role in assessing potential impacts on the wetland feature and the contributions of clean groundwater to the underlying aquifers. It is not readily apparent why the infiltration for a smaller portion of the site of the wetland feature has a greater loss of infiltration (25,625 m3) than that predicted for the entire site (23,605 m3). A clearer understanding of the relationship of the on-site wetland to the underlying groundwater system is needed.	The infiltration deficit for the on-site wetland feature, as detailed in the feature-based water balance, represents the amount of infiltration lost over its pre-development catchment area. Due to a catchment loss of 16.52 ha under post-development (uncontrolled) conditions, the estimated infiltration deficit is high. However, this catchment is based on surface elevations and not groundwater elevations/flow directions. GHD recommends that only the runoff deficit to the wetland be analyzed in conjunction with the feature-based water balance, as the estimated infiltration deficit is not reflective of recharge loss to the wetland. The text in the water balance memo in Appendix D of the SWM report has been revised to make this clearer.

14	Furthermore, roof water is recommended to be used for maintaining the hydroperiod of the wetland (presumably with evapotranspiration losses), and roof water is needed for maintaining groundwater recharge from predevelopment values to post-development. As this is a preliminary water balance, we are recommending that the final water balance address the issue of maintaining both the hydroperiod of the wetland and groundwater recharge.	Proposed LID and SWM measures within the SWM Report have been incorporated into the water balance to address the issues of maintaining the wetland hydroperiod and groundwater recharge. Please find the revised balance memo in Appendix D of the SWM Report.
	Valcoustics Canada Ltd. - Stationary Noise Source	
	The documents submitted to support the Zoning By-Law Amendment do not include a noise study.	The Land Use Compatibility assessment has been completed and is included in this submission. This Study includes a Noise Assessment.
	Salvini Consulting - Transportation Impact Study (TIS), February 2025	
	To address the Township's review process, I provide the following:	
1	The application is not complete because the GHD TIS is missing the sightline analysis at the site driveways.	The TIS has been revised to include a sightline assessment for each access.
2	In order for the application to be deemed complete, the GHD TIS should be updated to include the sightline assessment at the site driveways and should also address the additional comments below that are raised as a result of my preliminary review of the document.	Noted.
3	There are a number of questions and considerations that flow from my preliminary technical review of the GHD TIS that should be addressed in a future submission:	• The trip generation has increased due to changes to the Concept Plan. • Truck traffic estimates for each industrial land use has been included in the resubmission.

	• The traffic generation for the site is higher than I anticipated from the Terms of Reference, given the additional mix of uses, including office. The initial concept included only warehousing and an on-site daycare. • Truck traffic has not explicitly been discussed. Estimates of truck traffic should be provided along with proposed routing for the trucks • Although there may be peak hour capacity for this traffic on the road network, the functional classification of these roads (Sideroad 20 and Concession Road 4 in particular) and the design capacity of the pavement may not accommodate the forecast traffic, particularly the trucks. The geometry at key intersections identified in the GHD TIS should be reviewed to ensure that the design vehicles can be accommodated, and the functional classifications of the Township roads should be considered. • There may be options to accommodate site traffic that don't yet exist, including a new north-south connection to the new interchange at Highway 6 or new connections to the north through the City of Guelph that would provide options to connect to Highway 6 at the Laird Road interchange. We will need to coordinate with our colleagues at the County, MTO, and the City of Guelph as we explore the best options to accommodate the proposal. We should also coordinate with colleagues involved in the Puslinch By Design project considering future employment lands in the Township.	• The geometry and truck restrictions at key intersections have been reviewed and commented on in the resubmission. • Noted. We look forward to input from the MTO, County, and City based on these discussions.
	Wellington Source Water Protection - Kim Funk	
	Clean Water Act Section 59 Notice & Risk Management Plan A Section 59 Notice and Risk Management Plan are not required for this proposal. If the nature of the development changes, Notices may apply and a Risk Management Plan may be required.	Noted

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	Land Use Planning All documentation required in support of the ZBA application has been received. WSWP notes that the provided hydrogeological assessment and water balance is currently proposing a deficit, with the acknowledgement that the report will be updated once additional design work is completed.	Noted.
	Additional documentation will be required during a site plan application, including: • A Drinking Water Threats Disclosure Report and associated Management Plans as required by the County Official Plan policy 4.5.9.4. This report shall include, but is not limited to: a. Winter maintenance activities including snow and salt management b. Liquid fuel handling and storage c. Chemical handling and storage d. Waste handling, storage and disposal e. Spill response procedures. • An update to the submitted water balance assessment report that evaluates pre and post development hydrogeological conditions once additional design measures are known and appropriate LID measures can be proposed. • Documentation of all provincial approvals required for this property, including Environmental Compliance Approval and Permits to Take Water • Documentation that any unused wells on site will be decommissioned according to O.Reg 903, or incorporated into a monitoring program	Noted.
	County of Wellington – Technical Services Supervisor - Pasquale Costanzo	
	The County will require that the TIS be updated to indicate the types of vehicles with volumes that will be accessing the site, the routes traveled and reviewing the geometric impacts that tractor trailers will be placing on the County intersections.	The TIS has been revised to include the peak hour truck traffic, which generates a relative low number of trips in comparison to the overall vehicle trip generation. The geometry and truck restrictions at key intersections has also been reviewed and commented on in the resubmission.

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	Environmental Impact Study – Aboud & Associates	
	Section 3 – Study Approach and Methodology	
1	Section 3.1 - Background review should also include the following resources: • I Naturalist • Ontario Butterfly Atlas	Ontario Butterfly Atlas was included in the Background Review and is included in Table 3.1 iNaturalist records within the Study Area have been reviewed and the source has been added to the table.
2	Justification is not provided for the exclusion of reptile surveys. Given the pond present on the property, and that candidate habitat is identified for several special concern species of snakes, please include reasoning for not completing studies for turtles or snakes.	Thank you for your thorough review and comments on this topic. We note that some sections of the report and the SAR screening appendix carried wording completed at a much earlier phase of the project (high-level screening prior to repeated field visits) and were erroneously not updated for the final EIS. Since the wetland does not retain water depths suitable for snapping turtle or midland painted turtle overwintering, and they were not observed during multiple site visits between 2022 and 2024, snapping turtles and midland painted turtles were downgraded to Low Likelihood on-site. Similarly, formal reptile surveys, such as through coverboards, were not completed as part of the EIS, but staff were instructed to look for reptiles through visual searches during all site visits. Additional elaboration has been added to describe this in the methods. Given the lack of observations across the repeat surveys, the likelihood of reptiles on site is considered low, and the SAR screening has been updated accordingly. As additional assurance, these species were considered during the analysis for the report, despite some errors elsewhere in the text. These findings were presented in the executive summary and conclusions sections of the report. We also note that the wetland contains a semi-aquatic environment with emergent and submergent vegetation and amphibians suitable for ribbon snakes and milk snakes, in addition to basking sites suitable for painted

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		turtles. This habitat and the surrounding 30 m upland meadow will be retained, as they are the habitats on the site most likely to be used by reptiles, in the unlikely event they occur.
3	Define how transects for grassland birds were established and their locations.	The agricultural fields remain active with row crops and are unsuitable for eastern meadowlark nesting habitat. The Cultural Meadow was the only ELC community that exhibited a suitable habitat. The dimensions of the field are such that one point count location was sufficient to capture potential grassland bird activity. Target species (eastern meadowlark) were observed during the point count, determined to be a possible breeder, and as stated in the EIS, the project will register the activity under the ESA.
4	Section 3.4.5- As of January 2025, Eastern Red Bat, Hoary Bat, and Silver-haired Bat have been listed as Endangered per the Endangered Species Act (2007). This occurred prior to the report date of February 7, 2025. Please revise this section to include these species.	Section 3.4.5 has been revised to include these uplisted species.
5	Section 3.4.5- The report notes the usage of the Survey Protocol for Species at Risk Bats within Treed Habitats (MNRF 2017) for the identification of suitable bat maternity roosting habitat. An updated protocol was produced by MECP in 2022. The "Bats and Treed Habitats- Maternity Roost Surveys" (MECP 2022) protocol is to be referenced	We have referenced the MECP 2022 survey protocol within the report.
6	Section 3.4.5 - MECP guidance for bat maternity habitat is not an appropriate protocol for Eastern Red Bat, Hoary Bat, and Silver-haired Bat; please provide an assessment of habitat for these species within the project study area.	Acknowledged. We have updated the text with guidance for the habitat use of these additional species.
7	Section 3.4.5.2- The report identifies that one acoustic detector was placed near Tree 119; however, in Section 4.3.3.1 and Figure 2, a cavity tree (CT2) is noted in the northern portion of the subject property. Please provide rationale as to why a detector was not placed within the vicinity of CT2.	The detector was placed near suitable roost features and the highest likelihood area for foraging bats on the site. Emergence from any nearby roost was anticipated to be best captured by deployment in this location.

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8	Section 3.4.10 - Please provide the SWH screening assessment completed specifically to the site	The SWH screening assessment has been included. No SWH except for potential SWH for barn swallow is present.
9	Section 3.4.11- SCC species also include species with an S-Rank of S1-S3. Please revise this section include this criteria.	Revised as requested
	Section 4 - Existing Conditions	
10	Section 4.3.1- The second amphibian survey in 2024 was completed on April 30, 2024. Per the Marsh Monitoring Program (Birds Canada, 2008) the second survey is to be completed between May 15-30. Please provide rationale as to why the second survey was not completed in the accepted date range.	We agree that typical survey timing has historically been suggested for May 15 to May 30; however, we know, as an industry, that weather is increasingly unpredictable, and survey periods can be missed, shifting from the typical guidance prepared decades ago. The Birds Canada (2008) protocol states that the provided survey dates are a guideline and should be modified according to air temperature and wind conditions. The second survey was conducted on April 30, 2024, when suitable weather conditions were met (at least 10°C). Weather during the second survey was 11.9°C, with light air movement, no precipitation, and 70 percent cloud cover. Species expected to be calling during the mid-season were recorded, as is the intent of this survey.
11	Section 4.3.3.2- While the report is correct in noting that two Bat species are listed under both SARA and ESA, only the ESA regulations are of relevance to the proposed development.	Acknowledged.
	Section 5- Significant Natural Heritage Features	
12	Section 5.3- The report doesn't provide an adequate assessment of the presence of Significant Wildlife Habitat within the study area. Table 5.1 only provides rationale for Special Concern and Rare Wildlife Species; however, based on field investigations and results presented, there is potential for several other categories of SWH to be present within the study area. Please provide a comprehensive	The site-specific SWH screening assessment has been included as an appendix.

	assessment for each category of SWH and outline how they were considered, and why they were determined not to meet the criteria. This assessment is to be included as an appendix.	
13	Section 5.5- The report notes that impacts to Species of Conservation Concern should be avoided where possible. Species of Conservation Concern are considered under the Special Concern and Rare Wildlife category of Significant. Wildlife Habitat. Under the PPS (2024) and the County of Wellington Official Plan (2024), development and site alteration shall not be permitted in Significant Wildlife Habitat unless it has been demonstrated that there will be no negative impacts. Please revise.	Based on earlier comments that detected errors in the EIS text, and our noted rationale and revisions, the EIS has been revised to state that no SCC or corresponding SWH will be impacted.
	Section 7 - Impact Assessment and Mitigation	
14	Section 7.0- The report notes that the impact analysis considered direct and indirect impacts at both short-term and long-term timelines. The impact assessment also needs to consider potential cumulative impacts. Please revise this section to include cumulative impacts.	Cumulative impacts are not anticipated, as no negative impacts are anticipated.
15	Section 7.1.2- This section identifies mitigation Recommendations for potential impacts to the wetland as a result of siltation and altered flow. Please provide clarification on what 'altered flow' is defined as, as there are several impacts to the wetland that may occur as a result of the proposed development (i.e., changes to infiltration, catchment area, groundwater inputs to the wetland).	Potential altered flow relates to grading works that may temporarily alter the existing Site drainage patterns during construction. The EIS has been updated.
16	Section 7.2.1- Eastern Meadowlark was identified as exhibiting probable breeding evidence through field	Eastern meadowlark was determined as a probable breeder exclusively within the Cultural Meadow (CUM1) ELC community, which is displayed on

	investigations. As the proposed development has the potential to limit and/or remove habitat and disturb breeding, further detail is required. Please include the identified breeding habitat on the figures and the appropriate mitigation required under the ESA.	the included figures. Eastern Meadowlark mitigation and avoidance impacts will be handled through the ESA registration process.
17	Section 7.1.2 - As noted previously, newly listed bats must be considered separately, including potential impacts and mitigation due to different habitat requirements.	Acknowledged. This will be handled during the ESA process.
18	Section 7.2.2- Recommended mitigation measures need to be revised to include the appropriate mitigation for Eastern Meadowlark per the ESA. Confirmation/analysis of impacts to SWH under the Provincial Planning Statement (2024) and County of Wellington Official Plan (2024) is required, with adequate mitigation measures for negative impacts being recommended. 19 Section 8, Table 8.1- Endangered Species Act- The mitigation measures identified in Section 7.2 do not identify the appropriate mitigation measures required under the ESA. As such, the development does not comply with the ESA. Please revise.	The province determines acceptable mitigation for species at risk through the applicable ESA procedures. We have appropriately stated the project will register for impacts to Eastern Meadowlark and adhere to those requirements. As stated in previous responses on comments around SCC and SWH, the erroneous EIS text (missed updates) regarding the potential likelihood of the presence of SCC and SWH has been updated and clarified. This section has accordingly been updated to reflect the fact that the wetland and 30 m upland buffer is being retained, and that the habitat most likely to be used in the event SCC are present, is being retained.
	Section 8 - Policy and Legislative Compliance	
19	Section 8, Table 8.1- Endangered Species Act- The mitigation measures identified in Section 7.2 do not identify the appropriate mitigation measures required under the ESA. As such, the development does not comply with the ESA. Please revise.	The project will comply with the ESA and all mitigation required per provincial determinations as stated in the EIS.
20	Section 8, Table 8.1- Provincial Planning Statement- Section 5 notes the potential for SWH for SC and Rare Wildlife (Monarch, Eastern Milksnake, Eastern Ribbonsnake) and reptile hibernaculum. As targeted field investigations for these species/features were not completed, SWH is to be assumed for these categories at the most detailed level of ELC for the suitable habitat present. Please revise to include the assumed SWH.	Please refer to our responses to date around the presence of SCC and SWH. Based on the repeat visits from 2022-2024, the presence of SCC and SWH for these species is unlikely.

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21	Section 8, Table 8.1- The County of Wellington Official Plan (2024) includes Habitat of END or THR Species within the Core Greenlands designation. The presence of Eastern Meadowlark and Bat species listed as Endangered, as well as their habitat, was identified through field investigations. As it was acknowledged that habitat for the identified Species at Risk may be impacted by the proposed development, clarification is required as to how the proposed development is in compliance with Section 5.4.2 of the County of Wellington Official Plan (2024). Please include verbiage regarding SWH based on the outcome of the required assessment in Section 5.	Acknowledged. The wetland (SWH) is being retained with a 30 m vegetation protection zone.
	Section 9 - Conclusions	
22	The report notes that key features include wetlands and woodlands; however, habitat for species at risk (Eastern Meadowlark & Species at Risk Bats) was identified as being present on the subject lands. Please revise this section and provide verbiage on how the development will not negatively impact Eastern Meadowlark, Species at Risk Bats or their existing habitat.	MECP will confirm requirements to avoid impact to Species at Risk bats and their habitat within the Study Area. Eastern Meadowlark mitigation and avoidance impacts will be handled through the ESA registration process.
23	Potential habitat for SWH for SC and rare wildlife species, including Monarch, Eastern Milksnake, and Eastern Ribbonsnake, as well as reptile hibernaculum, was identified during field investigations. As targeted field investigations for these species were not completed, SWH is to be assumed at the most detailed level of ELC for the suitable habitat present within the study area. Please revise the conclusion to include the assumed SWH present within the study area.	Acknowledged. Please refer to our clarifications around this issue throughout our responses. We note again the EIS text was outdated in several sections, but the executive summary and conclusions reflected the updated findings.
	Figures	
24	Figures identifying existing conditions and natural heritage constraints were not adequately displayed. Please consolidate all relevant features (i.e., include all Cavity	Figures are presented separately for ease of viewing, so features do not become cluttered. As such, no edits to figures are necessary.

	Trees and bat detector on the exact figure). Please delineate the ELC communities with a more legible color.	
25	Figure 2- Vegetation communities outside of the subject property within the 120m study area are not identified. Per the Natural Heritage Reference Manual (OMNR, 2010), all vegetation communities are to be classified per the guidelines for assessing natural heritage features. Please revise the figure and associated sections of the report.	While we acknowledge that mapping communities outside of the Study Area can be beneficial, site access was not provided for adjacent properties. As such, additional information on vegetation community compositions could not be obtained. Mapped wetlands are provided, and aerial imagery indicates wooded communities interspersed with rural uses are prevalent.
26	Figure 2- Please include the 100m radius circles for the Breeding Bird survey point count locations	Breeding Bird Survey points displayed on Figure 2 sufficiently illustrate the survey station locations.
27	Figure 2- Please include the grassland bird survey transects	One point count location was sufficient to capture potential grassland bird activity due to the small size of the suitable grassland habitat at the site. Additional point counts would overlap with the completed point count and create repetition in the data. Targeted species (eastern meadowlark) were observed during the point count, determined to be a possible breeder, and will be registered under the ESA.
28	Figure 3- Please include the identified habitat for Species at Risk birds and bats.	At the time of the survey, habitat for SAR birds was exclusively confined within the CUM1. Habitat for SAR bats will be confirmed with the MECP, along with requirements to avoid impact to SAR bats and their habitat within the Study Area.
29	Figure 3- Please include the confirmed/assumed SWH	There is no confirmed SWH for SCC present on the Site property.
	Attachments	
30	Attachment 2- Please include a photo of the exterior of the barn structures on-site as they may exhibit suitable habitat characteristics for Bat species.	Acknowledged. A photo of the on-site barn and shed structure has been added to the photolog in Attachment H.
	Appendices	

31	Please provide an appendix including an assessment of the Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E categories and rationale as to whether they occur within the study area.	SWH screening assessment is included as an appendix.
32	Please provide an appendix with site investigations details including but not limited to, dates of surveys, temperature and wind at time of survey, and precipitation at time of survey and 24 hours prior, and staff who completed the surveys.	Acknowledged. Temperature, Wind (Beaufort Scale), and Precipitation have been added to T*able 3.2: Summary of Field Surveys Completed*. Statements in EIS survey methodology explain that weather parameters for each survey protocol were adhered to.
33	Please provide an appendix including a list of all wildlife species identified through background atlas review, including the source of each observation and year (if known).	SAR and rare species found in the background review study have been incorporated in the report where relevant (Including Appendix B and C). An additional appendix containing all previous observations within the Study Area will not add additional value to the report.
34	Please provide an appendix including an ELC data card for each community inventories on site, including representative photos of each community.	Field data including ELC data, were collected using a digital platform. Therefore, field sheets are not available. Relevant ELC methodology and data are presented in the report, nonetheless.
	GRCA Comments	
	It is our understanding that the applicant is proposing to re-zone the lands from agricultural to Industrial with a site specific use to permit a daycare centre. The GRCA does not object to the proposed zoning by-law amendment, however, we have several comments that will need to be addressed as part of a future site plan and GRCA permit submissions.	
1	The EIS recommends a 30 metre setback to the wetland, however, the stormwater outfall headwall location (outlet) is located within this recommended setback, directly adjacent to the wetland. It is recommended that all development activity, including the outlet is moved back from the wetland boundary and, if possible, outside of the 30 m wetland setback as recommended by the EIS. If all development, including the storm	Noted. To be addressed at Site Plan Stage.

	water outlet are not relocated outside of the 30 metre setback, the EIS will need to be revised to interpret potential hydrologic impacts to the wetland	
2	If all development activity, including grading and the stormwater outlet are located outside of the GRCA regulated area, a permit from the GRCA will not be required, and we would not undertake a technical review of the Site Plan submission.	Noted. To be addressed at Site Plan Stage.
3	If the proposed development is located within GRCAs regulated area, we offer the following comments that will need to be addressed as part of a future site plan submission	Noted. To be addressed at Site Plan Stage.
4	Currently it is indicated that there will be a 90% reduction in infiltration and runoff volume to the receiving wetland post-development without mitigations. A post-development water balance with proposed mitigations demonstrating how these mitigations will match the pre to post-development water balance is required.	Noted. To be addressed at Site Plan Stage.
5	The wetland boundary should be labelled with the date of confirmation with the GRCA and dimensions of the 30 m setback labelled on drawings.	Noted. To be addressed at Site Plan Stage.
6	SWM pond design criteria should be revised to indicate extended detention of the 25 storm with a drawdown of 24 to 48 hours, not a minimum of 48 hours.	Noted. To be addressed at Site Plan Stage.
7	Infiltration rate unit in the soil infiltration rate assessment table should be revised on Page 23 of98 of the SWM Report	Noted. To be addressed at Site Plan Stage.
8	A runoff coefficient of 0.9 has been assigned to the open landscape and pervious sub catchment area should be explained, as indicated on Page 11/98 of SWM Report. This value appears to be unusually high and should be justified	Noted. To be addressed at Site Plan Stage.
9	Whether the Concession Road 4 has the capacity to convey major storm discharge off site from the SWM pond, should be confirmed.	Noted. To be addressed at Site Plan Stage.

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10	The Storm Water Management Report should be stamped by a qualified Professional Engineer	Noted. To be addressed at Site Plan Stage.
11	An erosion and sediment control (ESC) plan, prepared by a licenced engineer will be required, including a dewatering plan.	Noted. To be addressed at Site Plan Stage.
12	It is recommended that a post-development monitoring program for the wetland is designed to detect potential hydrologic impacts to this feature. This could include hydrologic monitoring and monitoring of the mean wetness coefficient values for plant species within wetland communities using sample plots.	Noted. To be addressed at Site Plan Stage.