



Comment Summary – ZBA – 4631 Sideroad 20 N.– 2nd submission

Updated July 3 2025

Consultant	Comments
NPG Planning Solutions	See letter attached
GEI	See letter attached
Ecology	See letter attached
Hydrogeology	See letter attached
Noise Consultant	See letter attached
Traffic Consultant	See letter attached
GRCA	Consistent with previous comments, The GRCA has no objection to the zoning by-law amendment application and have comments that will need to be addressed as part of a future site plan and GRCA permit submissions. Please also note that the fee of \$2,500 for the GRCA's review of this application is still outstanding.
Sourcewater	See letter attached
MTO	See letter attached
County of Wellington Roads	As per Section 11 of the revised Transportation Impact Study, County intersections at Forestell Road/Downey Road/Wellington Road 35, Concession Road 4/Wellington Road 35 and Wellington Road 34/Side Road 20 require intersection



	improvements to accommodate truck turning movements. The County will require the proponent be responsible for making the necessary improvements to the noted intersections to accommodate the truck traffic generated by their site.
County of Wellington Planning	<ul style="list-style-type: none">- The County is currently reviewing the revised submission for the Official Plan Amendment to determine its completeness- Additional comments may be provided once the application is deemed complete by the Township and County
Township of Puslinch Fire Department	No comments
Township of Puslinch Building Department	No further comments. See the original comments from March 28, 2025, for items to be addressed if the applicant proceeds to the site plan application stage.
Township of Puslinch By-law Enforcement	No comments
Township of Puslinch Public Works	No comments received



June 24, 2025

Lynne Banks
7404 Wellington Road 34,
Puslinch, Ontario

Dear Lynne Banks,

RE: **NPG Comments**
4631 Sideroad 20 N
RE: Application for Zoning By-law Amendment

NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding an application for Zoning By-law Amendment proposing a large-scale prestige employment campus intended to accommodate industrial uses permitted in the Industrial Zone (IND) with additional uses being daycare and wholesale uses.

The development is proposed to proceed in phases. The initial phase includes the construction of a two-storey industrial building to house the headquarters of Danby Appliances and Upper Canada Forest Products and two (2) smaller buildings to accommodate a fitness centre and a daycare facility. Two (2) additional industrial one-storey industrial buildings would be constructed in subsequent phases. The applicant is also proposing 894 parking spaces and 26 accessible parking spaces, 36 loading spaces and 186 bicycle parking spaces.

This is the second submission for a Zoning By-law Amendment. As part of this submission, NPG has reviewed the following documents:

1. Comment response matrix prepared by MHBC, dated June 2025;
2. Cover letter prepared by MHBC, dated June 9, 2025;
3. Revised Site Plan prepared by Sweeny & Co. Architects, dated June 6, 2025;
4. Land Use Compatibility Assessment prepared by GHD Limited, dated May 30, 2025;
5. MDS Analysis prepared by MHBC, dated March 20, 2025;
6. Archeological Assessment prepared by Detritus Consulting, dated March 26, 2025;

7. Urban Design Brief prepared by MHBC, dated June 2025;
8. Zoning Matrix prepared by MHBC;
9. Draft Zoning By-law Amendment prepared by MHBC;
10. Functional Servicing Report prepared by GHD Limited, dated May 28, 2025;
11. Stormwater Management Report prepared by GHD Limited, dated May 28, 2025;
12. Grading and Servicing Plans; prepared by GHD Limited, dated May 2025;
13. Traffic Impact Study prepared by GHD Limited, dated May 28, 2025; and
14. Environmental Impact Study prepared by GHD Limited, dated June 2, 2025.

Comments:

Determination of Completeness:

15. We request that the Township not deem the application for Zoning By-law Amendment complete until the following comments have been addressed:
16. Land Use Compatibility Study
 - a) Section 3.3 of the Land Use Compatibility Study and the proposed amending By-law are not consistent. We request that the amending By-law be revised to reflect the list of uses that have been assessed in Section 3.3. Alternatively, the Land Use Compatibility Study may be revised to assess all of the uses contemplated within the Industrial Zone (IND) as proposed in the draft amending By-law.
 - b) For broad use types (e.g. industrial use, manufacturing etc.), we request that the land use compatibility study include zoning provisions to ensure that the scale of such uses does not exceed the scale of a Class II use.

Application Support:

17. A planning opinion on this matter will be forthcoming through the review process. The findings and recommendations of the Puslinch By Design: Employment Land Study will be considered in the review of the Application.

Technical Comments:

18. The MDS calculation indicatest that a small portion in northern side of the subject land, approximately 1.34 acre, lies within the barns at 4668 Sideroad 20 North setback area calculated by the minimum Distance Separation (MDS) I Formula. It is further stated that this minor overlap constitutes a small portion of the subject land and is situated at a higher elevation compared to the barns, which are located at a lower elevation. The zoning review will need to consider how MDS Guidelines #10 is being met.

19. The Parking Study includes parking requirements for “food services”; the Township Zoning By-law does not include any parking requirements for this term. Furthermore, the vehicle parking calculations between the Parking Study and the Site Plan do not align. Please clarify, if “food services” and would fall within the definition of “restaurant.”
20. As noted in our previous comments, the legal name of the Subject Lands should be included on the Site Plan.

Sincerely,



Jesse Auspitz, MCIP, RPP
Principal Planner
NPG Planning Solutions Inc.
jauspitz@npgsolutions.ca

June 25, 2025

GEI Project No. 2402578 – 122006-013

VIA CLOUDPERMIT: Township of Puslinch
Township Application No. D14-DAN

Lynne Banks
Township of Puslinch
4704 Wellington Road 34
Puslinch, ON N0B 2J0

Re: OPA & ZBA 2nd Submission
4631 Sideroad 20 North (Estill Innovation Hub)
Puslinch, ON

Dear Ms. Banks:

GEI Consultants Canada Ltd. (GEI) have reviewed second submissions for Official Plan Amendment and Zoning By-Law Amendment applications received from the Township of Puslinch (Township) on June 11, 2025. We are providing comments on the documents submitted in support of the proposed development on the subject lands located at 4631 Sideroad 20 North in the Township of Puslinch.

It is our understanding that the proposed development includes industrial and commercial buildings with multiple accesses from Concession Road 4 and one access from Sideroad 20 North. An Official Plan Amendment is required to redesignate a portion of the subject lands as Rural Employment Area and a Zoning By-Law Amendment is required to rezone the entire property as Industrial with a site-specific use to permit a daycare center.

The pre-consultation submission was received on July 14, 2022, per our pre-consultation comments letter dated July 20, 2022. The first Official Plan Amendment and Zoning By-Law Amendment application was received on March 12, 2025, per our review letter dated March 28, 2025.

1. Documents Received

All plans and studies required from an engineering perspective to support the Official Plan Amendment and Zoning Bylaw Amendment applications, have been submitted.

The following documents were received and reviewed as part of this submission:

- Cover Letter, prepared by MHBC Planning, dated June 9, 2025.
- Comment Response Matrix, dated June 2025.

- Site Plan, prepared by prepared by Sweeny & Co. Architects, dated May 6, 2025.
- Water Supply Analysis, prepared by GHD, dated January 29, 2025.
- Water Resources Impact Assessment, prepared by GHD, dated January 31, 2025.
- Preliminary Geotechnical Investigation Report, prepared by GHD, dated February 7, 2025.
- Stormwater Management Report, prepared by GHD, dated May 28, 2025.
- Functional Servicing Report, prepared by GHD, dated May 28, 2025.
- Grading and Servicing Plans (Rev. 2), prepared by GHD, dated May 28, 2025.

We defer detailed review of the following documents to Township staff and other consultants:

- Draft Zoning By-Law Amendment.
- Zoning Compliance Matrix.
- Land Use Compatibility Study, prepared by GHD, dated May 30, 2025.
- Archaeological Assessment, prepared by Detritus Consulting, dated March 26, 2025.
- Memo re: Minimum Distance Separation, prepared by MHBC Planning, dated March 20, 2025.
- Parcel Register, prepared on February 6, 2025.
- Public Consultation Strategy Form, dated February 9, 2025.
- Source Water Protection Screening Form.
- Planning Justification Report, prepared by MHBC Planning, dated February 2025.
- Urban Design Brief, prepared by MHBC Planning, dated June 2025.
- Traffic Impact Study, prepared by GHD, dated May 28, 2025.
- Environmental Impact Study (including Hydrogeological and Arborist Reports), prepared by GHD, dated June 2, 2025.

2. 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.

3. Technical Comments

Based on the review of documents identified in Section 1, we provide the following technical comments.

3.1. Deficiencies/Outstanding Matters

The following comments must be addressed to support the application.

No.	Matter	Document	Comment
1.	Sewage Quality and Quantity Assumptions	Functional Servicing Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> Acknowledged.</p> <p><u>GEI Comment (June 25, 2025)</u> We will discuss this item with the Township Planning Consultant.</p>
5.	PCSWMM Model	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> Please provide PCSWMM model outputs for all the storm events modelled. Appendix C currently only provides modelling outputs for the 100-year storm event.</p> <p><u>Response (June 2025)</u> PCSWMM model outputs for all storm events have been included in Appendix C.</p> <p><u>GEI Comment (June 25, 2025)</u> Post-development model outputs for all storms have been reviewed, but only the 100-year storm pre-development model output was provided.</p> <p>The 10-year post-development controlled peak flow to wetlands is shown as 0.243 m³/s in Table 7, but 0.270 m³/s in the model.</p>
6.	Sediment Drying Area	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> Please consider the inclusion of a sediment drying area as per Table 4.6 in the MOE SWMP Manual (2003).</p> <p><u>Response (June 2025)</u> A sediment drying area has been provided west of the SWM pond near the proposed cul-de-sac. Refer to Drawing SS102 for details.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. Can you please provide a sediment loading calculation per MOE SWM Manual page 6-13 to demonstrate that the area is large enough and also identify the expected frequency of cleanout?</p>

No.	Matter	Document	Comment
11.	Forebay Design	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> Section 5.3.2 states that a 3.0 m deep forebay is provided, whereas the drawings indicate that the bottom of 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.</p> <p>Please provide calculations of settling length, dispersion length, flow velocity and settling velocity, and confirm that they are in keeping with MECP guidelines.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Section 5.3.2 of the SWM report states that the berm elevation is at 331.60 rather than 331.67. The forebay calculation sheet in the appendix refers to an actual forebay length of 59 m, where elsewhere it is reported to be 86 m long. The 5-year inlet flowrate used for the dispersion length calculation does not appear to match the value in the PCSWMM model output – 2.83 m³/s compared to 3.189 m³/s.</p>
12.	Infiltration System Configuration	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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).</p>

No.	Matter	Document	Comment
			<u>GEI Comment (June 25, 2025)</u> Acknowledged. The invert elevations for the last three rows of Table 9 in the SWM report are obvert elevations. Please update.
22.	Treatment Train	Stormwater Management Report	<u>GEI Comment (June 25, 2025)</u> Per the Township Hydrogeologist, an appropriate impact assessment for stormwater quality should be undertaken, as it is likely that future runoff will be laden with salt and other chemicals. Pending the results of that assessment, additional treatment of stormwater may be required, or other mitigation strategies may need to be implemented onsite.
23.	100-year storm elevation for SWMF	Site Servicing Plan #2	<u>GEI Comment (June 25, 2025)</u> The drawings show a 100-year elevation of 332.86 m for the SWMF, whereas the model and report show an elevation of 332.64.
24.	Table 8	Stormwater Management Report	<u>GEI Comment (June 25, 2025)</u> It appears that the title of last column of Table 8 should refer to a provided rather than a required volume.

3.2. Completed/Approved Matters

The following comments have been addressed.

No.	Matter	Document	Comment
2.	Fire Water Storage Tanks	Functional Servicing Report	<u>GEI Comment (March 28, 2025)</u> 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. <u>Response (June 2025)</u> Acknowledged, please see the revised Functional Servicing Report. Note that the watermain connects all fire cisterns besides the one for the daycare, such that the volume from all tanks contributes to the overall demand. <u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.
3.	General Site Information	Stormwater Management Report	<u>GEI Comment (March 28, 2025)</u> The final paragraph of Section 2.2 should be updated with the most recent groundwater level information.

No.	Matter	Document	Comment
			<p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
4.	Rainfall Parameters	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
7.	Permanent Pool Volume	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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 m³/ha of permanent pool storage is calculated to meet the permanent pool requirements for 66% imperviousness, aiming to achieve 80% TSS removal.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>

No.	Matter	Document	Comment
8.	Pond Slopes	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
9.	Pond Freeboard	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
10.	Pond Outlet Orifice	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>

No.	Matter	Document	Comment
13.	Infiltration System Quality Control	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
14.	Water Balance Assessment	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> 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 appears to be small inconsistencies throughout.</p> <p><u>Response (June 2025)</u> The Water Balance Assessment provided in Appendix D has been updated.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
15.	Drawdown Times	Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> Please provide drawdown times for the SWM pond and infiltration galleries.</p> <p><u>Response (June 2025)</u> 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).</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
16.	GRCA Regulation Limit	Grading and Servicing Plans	<p><u>GEI Comment (March 28, 2025)</u> Please show and label the GRCA regulation limit on all drawings.</p>

No.	Matter	Document	Comment
			<p><u>Response (June 2025)</u> Acknowledged. A label has been included on all drawings that notes "GRCA Regulation Limit".</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
17.	Maintenance Access Road	Grading and Servicing Plans	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> Acknowledged. The maintenance access road has been widened around the pond to a 4m width. Labels have also been added to illustrate this width.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
18.	Drainage Area Linework	Grading and Servicing Plans	<p><u>GEI Comment (March 28, 2025)</u> 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.</p> <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
19.	Septic System Area	Grading and Servicing Plans	<p><u>GEI Comment (March 28, 2025)</u> Storm Drainage Area Plan #2 shows a septic system area of 1800 m² and an available cistern area of 4346 m². Since the entire septic system area appears to be 4346 m², then the available cistern area is less than this. It should also be noted that the stone area has been preliminarily calculated as 1800 m², but the sand area would be 3375 m² based on those assumptions.</p> <p><u>Response (June 2025)</u></p>

No.	Matter	Document	Comment
			<p>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. Therefore, there is sufficient available area in the septic bed location to service the site adequately.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
20.	Gross Construction Areas	Site Plan	<p><u>GEI Comment (March 28, 2025)</u> Please provide the gross construction area in square metres rather than, or in addition to, square feet on the Site Plan.</p> <p><u>Response (June 2025)</u> The concept plan has been added to show the GCA in square metres.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>
21.	Inconsistencies	Functional Servicing Report, Stormwater Management Report	<p><u>GEI Comment (March 28, 2025)</u> Please address the following inconsistencies in the Functional Servicing Report:</p> <ul style="list-style-type: none"> a) Section 3.4 states that 14 tanks are proposed while the drawings show 15 tanks. <p>Please address the following inconsistencies in the Stormwater Management Report:</p> <ul style="list-style-type: none"> 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 332.68 m while Table 5 indicates 332.86 m. <p><u>Response (June 2025)</u> 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.</p> <p><u>GEI Comment (June 25, 2025)</u> Acknowledged. No further comment.</p>

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

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
Project Engineer



Parth Lad, E.I.T.
Technical Specialist



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GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION
OLT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

June 24, 2025

Our Project #: AA21-049A-011
Submitted via Cloudpermit.

Lynne Banks
Development and Legislative Coordinator
Township of Puslinch
7404 Wellington Rd. 34
Puslinch, ON N0B 2J0

**Re: Estill Innovation Community, Township of Puslinch
Environmental Impact Study, 2nd Submission
Peer Review – Ecology**

The Township of Puslinch has retained About & Associates Inc. (AA) to provide a peer review of the revised Environmental Impact Study (EIS) for the Estill Innovation Community found at 4631 Side Road 20 N, dated June 2, 2025, completed by GHD.

The following documents were also received from the Township of Puslinch and reviewed for context.

- Sweeny & Co Architects. 2025. Site Plan, Concept Plan, Area Statistics. June 5, 2025.
- GHD. 2025. Functional Servicing Report 4631 Sideroad 20 North, Township of Puslinch, Ontario. May 28, 2025.
- GHD. 2025. Estill Innovation Hub Project Support Site Servicing & Grading Plans. May 2025.
- GHD. 2025. Stormwater Management Report Estill Innovation Community. May 28, 2025.

AA has reviewed the updated EIS report and associated appendices, and the provided comment response matrix (June 2025). Per the requirements of the Township, our review has been broken down into the following sections:
Determination of Completeness, Additional Requirements and Technical Comments.

Determination of Completeness:

Per our review, there are several outstanding concerns requiring additional information and/or clarification that we have identified for the updated EIS (GHD, June 2025). Based on this, our opinion is that the revised application is incomplete, as outlined in the technical comments below. Concerns include clarification on results, and impacts to the hydrological function of the wetland. Additionally, we have reviewed the provided comment matrix and include our response to comments provided by GHD per our initial assessment (Appendix 1).

Technical Comments & Additional Requirements:

Bat maternity habitat assessment

Through our review of the updated EIS, results have not identified if suitable habitat is present on site for Eastern Red Bat, Hoary Bat, and Silver-haired Bat, please update the results to identify if habitat is present for these species on site and the location of suitable habitat. The report must be revised to discuss impacts to the habitat of these species separately from maternity colony forming species, as a result of the proposed work. This may include identifying the need for additional studies to determine the presence of candidate trees and/or shrubs for these species, specifically. The identification of suitable habitat for SAR bats does not require confirmation from the MECP and is a proponent led process and should be identified or assumed present at this stage of the assessment.

Impacts to Wetland Hydrology

Per updates to the FSR, SWM, Hydrogeology, and Water Balance assessments, there are new concerns related to the proposed capture and infiltration of roof water and clean surface water to the wetland that have not been discussed in the EIS. Please provide an assessment and justification for the increase in surplus water, both infiltration and runoff, to the wetland as described in the Water Balance technical memo. In particular, as it relates to the updated Hydrogeology Report that indicates perched conditions, which implies that infiltration is not provided by the wetland, and thus, the additional inputs would alter the typical hydroperiod and hydrological regime of the wetland.

While it's understood that an overflow structure will be built, additional details on the overflow are needed at this stage to determine if these impacts are fully addressed. The EIS also indicates it will overflow into a municipal storm sewer, which does not exist in the vicinity of the property while further in the paragraph says it will overflow to Concession 4, please confirm the proposed overflow receptor, and if the receptor has the capacity is available for the overflow. An overflow would only address an increase in water level above a certain point, how will the overflow address the potential presence of increased water in the wetland during periods that are typically dry, and are below the overflow structure?

Policy & Legislative Compliance

Revisions to Table 8.1 are still required to demonstrate compliance with all applicable policies. The County of Wellington Official Plan (2024) includes Habitat of Endangered or Threatened Species within the Core Greenlands designation. Rationale for how the proposed development is in compliance with the County of Wellington Official Plan (2024) regarding Core Greenlands continues to include reference to wetlands only.

Figures & Appendices

A Figure that includes the proposed site plan should be included to provide a representation of the footprint and development limits in context to the surveys and results of the assessment.

Representative photos of each ELC community continue to be required to confirm the current site conditions.

Conclusion

In conclusion, our review of the submitted revised EIS and supporting documents has determined that additional details are required to fully address the potential impacts of the proposed development. This additional information will include clarification of present Species at Risk habitat, hydrological impacts to the wetland and response to comments that were not fully addressed from the initial peer review.

Please contact the undersigned should you require additional information of the above.

Yours truly,

ABOUD & ASSOCIATES INC.



Shannon Davison B. Env., Eco. Rest. Cert.
MNR Certified ELC & OWES
Terrestrial & Wetland Ecologist

&



Cheryl-Anne Ross, B. Sc., F.W.T.
MNR Certified ELC & OWES
Ecology Lead & Wildlife Ecologist

Attachments:

Appendix 1. Comment Matrix

#	Comment	Response	AA comment - Second Submission
	Environmental Impact Study – Aboud & Associates		
	Section 3 – Study Approach and Methodology		
1	Section 3.1 - Background review should also include the following resources: <input type="checkbox"/> I Naturalist <input type="checkbox"/> 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.	addressed.
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 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.	Addressed.
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.	Transects are not point counts, and are intended to flush grassland birds that were not captured during a stationary point count within suitable habitat. Provided that all suitable habitat is assumed to be breeding habitat for SAR grassland birds, the point count result is sufficient.

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 before 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.	addressed.
5	Section 3.4.5- The report notes the usage of the Survey Protocol for Species at Risk Bats within Treed Habitats (MNR 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.	addressed.
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.	Please confirm if suitable roosting/maternity habitat for these species is present on site and impacts are expected.
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.	Given that almost all SAR species were detected, this is sufficient. However, it should be noted that the bat detector microphone range for most acoustic detectors is approximately 20-30m, a single detector would not capture bats across the entire property and would not confirm absence of any species.
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.	Addressed.
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	Addressed.
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.	Addressed.
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.	Addressed.
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 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.	The site-specific SWH screening assessment has been included as an appendix.	Addressed.
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.	Addressed.
Section 7 - Impact Assessment and Mitigation			
35			Per updates to the FSR, SWM, and Water Balance assessments, there are additional concerns related to the proposed capture and infiltration of roof water and clean surface water to the wetland that have not been discussed in the EIS. please provide an assessment and justification for the increase in surplus water, both infiltration and runoff, to the wetland as described in the Water Balance technical memo. In particular, as it relates to the updated Hydrogeology Report that indicates perched conditions, which implies that infiltration is not provided by the wetland, and thus, the additional inputs would alter the typical hydrological regime of the wetland. While it's understood that an overflow structure will be built, additional details on the overflow are needed to determine if impacts are fully addressed. The EIS indicates it will overflow into a municipal storm sewer in one section of the report and concession 4 in another; municipal storm sewers do not exist in the vicinity of the property. An overflow would only address an increase in water level above a certain point. How will the overflow address the potential presence of water in the wetland during periods that are typically dry, and are below the overflow structure?

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.	Partly addressed. Changes to infiltration and surface water flow may negatively impact the wetland hydroperiod and have not been thoroughly discussed or addressed.
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.	Concerns related to surface water flow and infiltration require consideration as a potential impact to the wetland as a result of the proposed development. The implementation of a buffer does not address this impact.
16	Section 7.2.1- Eastern Meadowlark was identified as exhibiting probable breeding evidence through field 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.	Eastern meadowlark was determined as a probable breeder exclusively within the Cultural Meadow (CUM1) ELC community, which is displayed on the included figures. Eastern Meadowlark mitigation and avoidance impacts will be handled through the ESA registration process.	addressed.
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.	Identification of habitat for SAR bats does not require confirmation from the MECP. Seeking an ESA authorization or exemption is a client-led process. The person carrying out an activity is responsible for determining whether SAR and/or their habitat are present on or around the site of the activity, and ultimately ensuring their actions do not contravene the ESA. It should be identified or assumed present at this stage of the assessment to ensure impacts to all Species at Risk have been considered and are carried forward to the permitting 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.	The Policy and legislative compliance section continues to fail to address unmapped 'Core Greenland' features per the OP definition. Complete removal of Core Greenland is being proposed through the removal of species at risk habitat (Bats and Eastern Meadowlark), and is not adequately considered or discussed.
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.	See AA Response to comment 17.
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.	addressed.
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.	see AA response to comment 18.
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.	See AA Response to comment 17.
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.	Addressed.
Figures			
24	Figures identifying existing conditions and natural heritage constraints were not adequately displayed. Please consolidate all relevant features (i.e., include all Cavity Trees and bat detector on the exact figure). Please delineate the ELC communities with a more legible color.	Figures are presented separately for ease of viewing, so features do not become cluttered. As such, no edits to figures are necessary.	Addressed.

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.	Site access is not required to complete high level mapping of adjacent features.
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.	100m survey radius were requested to ensure the surveys adequately covered the site.
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.	Noted.
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.	Habitat for SAR bats does not require confirmation from the MECP and is a proponent led process, and should be identified or assumed present at this stage of the assessment.
29	Figure 3- Please include the confirmed/assumed SWH	There is no confirmed SWH for SCC present on the Site property.	addressed per previous responses.
36			A figure that includes the proposed site plan should be included as part of the assessment of impacts to natural heritage feature.
	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.	addressed.
	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.	addressed.
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 <i>Table 3.2: Summary of Field Surveys Completed</i> . Statements in EIS survey methodology explain that weather parameters for each survey protocol were adhered to.	addressed.

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.	the background wildlife list has been requested to confirm that all SAR and Rare species have been considered and addressed as part of the assignment.
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.	representative photos of each community should still be included to confirm the existing condition. Collecting data digitally is irrelevant to the request; digital data can easily be transferred to a report format and should be included to confirm that the necessary information was collected per the identified methodology. Particularly as staff and their qualifications are not included.



Harden Environmental Services Ltd.
4622 Nassagaweya-Puslinch Townline
Moffat, Ontario, L0P 1J0
Phone: (519) 826-0099 Fax: (519) 826-9099

Hydrogeological Assessment

Geochemistry

Phase I / II ESA

Regional Flow Studies

Contaminant Investigations

OLT Hearings

Water Quality Sampling

Groundwater & Surface
Water Monitoring

Groundwater Protection
Studies

Groundwater Modelling

Groundwater Mapping

Permits to Take Water

Environmental Compliance
Approvals

Designated Substance
Surveys

Our File: 2506

June 24, 2025

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attention: Lynne Banks
Development and Legislative Coordinator

**Re: 4631 Sideroad 20N
Proposed Industrial/Commercial Development
2nd Submission**

Dear Lynne,

1. Determination of Completeness – Assess whether sufficient information and materials have been provided to deem the application complete, specifically whether all required plans and studies have been submitted.

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 for the testing of the underlying aquifer for quantity and quality of groundwater. It is our opinion that this could be set aside to a later stage of the application process.

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.

The application is incomplete insofar as detailed assessment of water quality impacts on groundwater has not been presented for either the septic system or the infiltration of impacted stormwater.

2. Additional Requirements – If the submission is incomplete, identify any additional materials required for processing the application.

There must be an improved storm water evaluation that identifies the hummocky nature of the Paris Moraine including several on-site closed depressions. The oversimplification of the hydrological characteristics of the site have led to a great dependence on the on-site Provincially Significant Wetland as a repository for runoff to infiltrate. The revised groundwater report has identified that the pond is isolated from the underlying groundwater system and therefore a poor candidate area for infiltration to compensate for increased impervious cover at the site.

3. Technical Comments – Provide any technical comments that must be addressed to support the application.

Water Supply

- 1) The water supply report must be updated to include this recommendation. *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 will not be any wellbores open to both the Guelph Formation and the Goat Island/Gasport aquifer.*

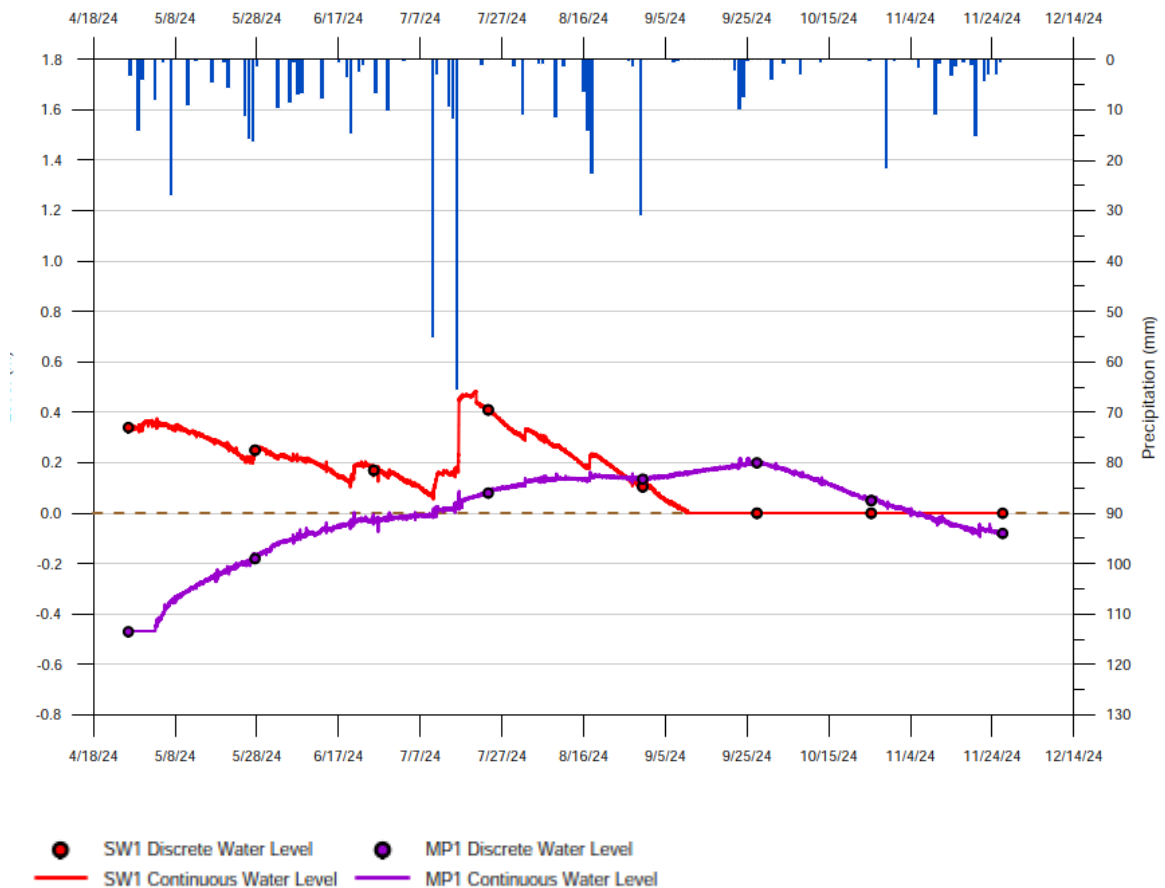
Sewage Disposal

- 2) The sewage disposal report from GHD addresses the nitrate impact potential by recommending a sewage treatment system that reduces nitrate to 2.5 mg/L. The GHD response to the first submission is that this is 2.5 mg/L of nitrate as nitrogen. Additional information is required to provide estimates of total nitrogen concentration in the effluent, what nitrogen compounds are likely to be in the effluent (and their relative concentrations) and where conversion to nitrate will take place.

Hydrogeology

- 3) 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 m AMSL. The wetland has now been interpreted to be part of a “perched” surface water system. The concept of a perched system should be used carefully as it means separated from deeper groundwater system by an unsaturated zone. The presence of an unsaturated layer beneath the pond has not been identified in the reports. The hydrograph provided in the Surface Water monitoring report indicates that the surface water in the wetland and the underlying groundwater behave

entirely differently under seasonal conditions. As the pond surface water is declining during the summer, the underlying groundwater elevation is increasing to the extent that the groundwater elevation is above the pond bottom and yet the pond is dry. The groundwater elevation in nearby MW10-23 rises and falls by over 2.5 m in the monitoring period whereas groundwater elevations elsewhere on the site vary by tens of centimeters. Neither SW-1 nor MP1 exhibit this same behaviour. In this way we concur that the surface water in the Provincially Significant Wetland shows no hydraulic connection to underlying groundwater systems.



The wetland appears to be an important feature of the post development water balance as both storm water (during major events) and roof leader water is proposed to be directed to the wetland. The wetland will not function as a proposed infiltration area given its isolation from the underlying groundwater system by low permeability sediments.

Water Balance

- 4) The site specific and feature based water balances play a very important role in the assessment of potential impacts to the wetland feature and contributions of clean groundwater to the underlying aquifers. Upon review of the updated FSR and the updated water balance it is clear that the assignment of almost the entire site as a catchment area for the onsite wetland is a very oversimplification of the existing conditions. As indicated in the figure below identified as red circles, there are several depressions on the site that cannot have surface water reporting to the wetland. We have not done a complete analysis but there are at least four depressions that will not allow runoff to escape and report to the wetland. This oversimplification then results in an overestimation of pre development runoff to the wetland and thus an overestimation of the ability of the wetland to infiltrate water.



- 5) The water balance brief is not correct in stating in Section 6.1 that the continuous hydrograph of MP1 is similar to that of SW1 in showing a hydraulic response to a major rainfall event. The hydrograph of MP1 shows no response to the July event an indication of isolation of the surface water in the wetland and the underlying groundwater system.
- 6) There is a significant increase in surplus water to the wetland feature with expected infiltration in the wetland (increase of 42%) and increase in runoff to the wetland (increase of 102%). The identification of the wetland being an isolated system from the water table suggests that this increase in surplus water will inundate the wetland.

- 7) Section 6.2 of the water balance brief states that a high-level overflow will ensure that the hydroperiod remains the same. Where does this overflow discharge the storm water to? There is no mention of this overflow from the wetland feature elsewhere in the documentation.

Harden Environmental Services Ltd.



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

June 27, 2025

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario
N0B 2J0

Attention: Lynne Banks
lbanks@puslinch.ca

VIA E-MAIL

**Re: Peer Review of Land Use Compatibility Study
4631 Sideroad 20 North
Puslinch, Ontario
VCL File: 125-0115**

Dear Ms. Banks:

We have completed our review of the "*Land Use Compatibility Study, 4631 Sideroad 20 North, Puslinch Township, Ontario*", dated 30 May 2025, prepared by GHD.

Our comments are outlined herein.

1.0 COMMENTS

- a) The study is a land use compatibility study and as such addresses more than just noise impacts. This review only relates to the noise portions of the study.
- b) The noise assessment has applied the Ministry of Environment, Conservation and Parks (MECP) noise guideline requirements of NPC-300. This is considered appropriate.
- c) The fourth paragraph of the Executive Summary states that the proposed development is not expected to produce significant noise emissions that would impact sensitive land uses. However, the next paragraph state that noise is the primary emission from the development and has been assessed in more detail than the other potential nuisances. The inclusion of noise in the fourth paragraph is likely a typo.
- d) The GHD report indicates there will be three industrial buildings in the Executive Summary, two three industrial buildings in 2. Site and Development Description section and four industrial buildings in 3.3 Classification of the Development section. It is our understanding that there will be three industrial buildings. It should be noted that there appears to be an issue with the figures in the report as they appear to have been cropped and are not understandable.

- e) The D-6 assessment states the most intense industrial uses being contemplated are Class II industries. At a minimum, Industrial Building #1 is very large with multiple loading docks and manufacturing a proposed use. Also, four forklifts are proposed to operate outdoors which suggests extensive outdoor storage of materials which is more indicative of a Class III industry. Additional detail is needed to support the Class II categorization in the GHD report.
- f) This statement in 3.4 Guideline D-6 Assessment Conclusions section is unclear *“this analysis is not an exhaustive consideration of all possible sensitive land uses that could be impacted by the proposed Site, but rather preliminary screening of the most probably points of concern”*. The purpose of this study is to ensure compliance with the noise guideline limits at all noise sensitive receptor locations and not just at a few. Clarification is needed.
- g) Section 4.5 Noise of the report states that the sensitive uses surrounding the site are residential dwellings and outdoor living spaces. It should be noted that MECP Publication NPC-300 considers a daycare as a noise sensitive land use and the proposed on-site daycare (and any other sensitive uses that could be on the development site) should be included in the noise assessment.
- h) Two issues with the paragraph immediately after Table 4.3 Background Road Traffic Parameters:
 - a. First sentence states the sound levels were calculated at the facades of the Development. This likely should state that sound levels were calculated at the sensitive receptors and not at the Development; and
 - b. The report states that the lowest sound levels generally occur at the ground floor level of receptors. However, Table 4.4 reports background sound levels at the upper floor of two storey dwellings. Since the background sound level (and corresponding guideline limit) will be lower, first floor façade receptors should also be included in the assessment.
- i) The fourth bullet in 4.5.2.1 Methodology states that the buildings were modelled as being reflective with an absorption coefficient of 0.99. An absorption coefficient of 0.99 is highly absorptive. A more appropriate reflective sound absorption coefficient should be used to complete the assessment.
- j) It is unclear how the truck idling scenarios were developed since the numbers of trucks idling is significantly less than the truck traffic entering and leaving the site. In addition, there are more loading bays where trucks could also idle. Clarification as to the rationale for the limited number of trucks idling is needed.
- k) It is also unclear whether refrigerated trucks are permitted to operate at this development site. If they are, then the truck mounted refrigeration units need to be included as a noise source.

- l) 4.5.2.2.3 Forklifts indicates there could be four forklifts operating outdoors. However, review of the figures (cannot see the figure numbers) seems to indicate that forklift activity has not been included in the assessment. In addition, why are forklifts assumed to only operate for 30 minutes of an hour? This does not seem to reflect a predictable worst-case.
- m) 4.5.2.2.4 Truck Coupling Impulses indicates that the shunt truck movements are expected to generate two coupling/uncoupling impulses in an hour. This would represent one shunt truck movement (i.e. pick up a trailer and drop the trailer off). There should be four impulses from the two truck movements indicated in Table 4.5. It is not clear what other impulses have been included in the assessment as Table 4.6 lists the truck movements and not the number of impulses. Finally, it is not clear how the predictable worst-case impulse scenario was developed. All impulses dispersed across the entire site does not represent the worst-case. Thus, justification for the modelled scenario(s) is needed.
- n) Additional impulses can be generated at this type of facility that have not been included in the assessment:
 - a. Forklifts travelling over dock levellers generate impulses which are typically included in the noise assessment; and
 - b. Forklifts travelling outdoors can also generate impulses, either by their forks banging/rattling or with the types of material (i.e., metal) they are carrying).
- o) Section 4.5.2.4 Preliminary Noise Control Recommendations does not indicate what the physical noise control measures that are to be implemented at the site will be. For the steady noise sources, Table 4.8 predicts excesses above the guideline limits. The noise controls indicate mechanical equipment is to have sound power levels not exceeding those used to complete the study which shows non-compliance with the guideline limits. For the coupling/uncoupling impulses, operator education and care is recommended. We agree that operator care reduces the coupling/uncoupling impulse noise level. However, clarification on how to make this an enforceable requirement at all times is needed. Thus, the report should include the recommended physical noise mitigation measures and how the recommended operational controls will be implemented, monitored and enforced.
- p) Section 4.5.2.4 also states that the study only needs to be updated if there are design changes to the proposed Development. The noise study should be updated once detailed design information is available to ensure the noise guideline limits and operational assumptions used to complete the noise study are not exceeded.
- q) As indicated above, the pages in my version of the appendices appear to have been cropped (i.e., legends are only partially shown, title blocks are partially shown, sample calculations do not indicate the noise source, etc.). Thus, we have been unable to verify the report findings.

2.0 CONCLUSIONS

Our review of the land use compatibility study prepared in support of the proposed industrial development indicates there are a few items, as outlined above, that require further clarification and assessment before we can concur with its findings and conclusions

If there are any questions, please do not hesitate to call.

Yours truly,

VALCOUSTICS CANADA LTD.

Per:



John Emeljanow, P.Eng.

JE\
2025-06-27 Peer Review V1.0.docx



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June 25, 2025

Lynne Banks
Development and Legislative Coordinator
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON · N0B 2J0

**Re: Estill Innovation Community, 4631 Sideroad 20 North
Transportation Impact Study (TIS), May 2025
Deem Application Complete, OPA and ZBA 2nd Submission
Township Peer Review Comments**

Dear Lynne,

I've reviewed the May 2025 TIS prepared by GHD (GHD TIS) for the site noted above as requested. The site is the subject of planning applications for the development of industrial uses in three phases. The GHD TIS was undertaken for the full development of the site, including five buildings.

The consultant provided a Terms of Reference for the TIS in advance which I reviewed and commented on. I also provided comments on an initial version of the TIS asking for sightline analyses at the proposed driveways and more information about truck traffic and related constraints in the transportation network. The updated TIS addresses the scope that I asked for. I will be providing a more detailed review of the TIS in future and some preliminary comments in this letter.

To address the Township's review process, I provide the following:

1. **Additional Requirements:** The application is complete from a transportation perspective. There are no additional requirements at this time to deem the application complete.
2. **Application Support:** I am not yet prepared to support the application. I will be undertaking a thorough review of the TIS and coordinating with our colleagues at the County, the City of Guelph and the MTO given that there are transportation impacts on the network that require agency coordination to address. The study has considered options to address these impacts.
3. I do not yet support the application.
4. I will review and discuss the application in more detail with our other agency transportation colleagues.

5. At this time I do not need additional technical items to support the application, but there may be a need for additional information and discussion with the applicant as we complete our review.

The applicant has assessed an option that incorporates a new north-south road providing connectivity between the site and the new Highway 6 interchange. This option was originally suggested by MTO and further discussion is needed with our other transportation agency colleagues to determine what the best solution is for providing access to these lands if they are to develop as proposed. Any offsite improvements, including a new road, would be at the developer's cost.

I will continue to coordinate with our transportation colleagues on my review of this application including those involved with the Puslinch By Design project considering future employment lands in the Township.

Please let me know if you have any further questions about my review of the subject application.

Sincerely,



Julia Salvini, MEng, PEng, FITE
President

Cc: Mike Fowler, Township of Puslinch
Justine Brotherston, Township of Puslinch
Pasquale Costanzo, Wellington County
O'Neil Nembhard, MTO
Andrea Reed, GEI Consultants



June 19, 2025

Memorandum

To: Lynne Banks – Development and Legislative Coordinator, Township of Puslinch

Cc: Jesse Auspitz – Principal Planner, NPG Planning Solutions
Mehul Safiwala – Junior Planner, Township of Puslinch

From: Kim Funk – Risk Management Inspector, Wellington Source Water Protection

**RE: 4631 Sideroad 20 North, Township of Puslinch
Zoning By-law Amendment - Submission 2**

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. This property is located within a vulnerable area and our review was completed to ensure the activities at this property meet the requirements of relevant Source Protection Plan and County of Wellington Official Plan policies.

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 Risk Management Plan may be required.

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 will be updated once additional design work is completed.

Additional documentation will be required during a Site Plan application as outlined below:

1. 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.
2. An update to the submitted water balance assessment report that evaluates pre and post development hydrogeological conditions once additional design measures are known. It is requested that the water balance assessment be calculated on monthly averages as opposed to annual averages. Please see Appendix D for additional guidance on completing the water balance.
3. Documentation of all provincial approvals required for this property, including Environmental Compliance Approval and Permits to Take Water.

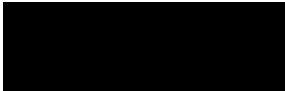


4. Documentation that any unused wells on site will be decommissioned according to O.Reg 903, or incorporated into a monitoring program.

Guidance for the above requested information will be provided to the applicant during a Site Plan application.

For more information, please contact sourcewater@centrewellington.ca.

Sincerely,



June 19, 2025

Kim Funk
Risk Management Inspector
519-846-9691 ext 283
kfunk@centrewellington.ca

Resources: [Appendix C: Guidance Documents](#)
[Appendix D: Water Balance ToR](#)

Ministry of Transportation

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Corridor Management Section
West

659 Exeter Road
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Ministère des Transports

Bureau du génie
Section de la gestion des couloirs routiers
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July 2, 2025

RE: Official Plan and Zoning By – Law Amendment Applications (D14-DAN) – Puslinch Development GP Inc.- 4631 Side Road 20 North, Township of Puslinch.

The Ministry of Transportation has completed the review of the Official Plan and Zoning By-law Amendment (OP/ZBA) Applications for 4631 Sideroad 20N, Township of Puslinch. The proposal has been considered in accordance with the requirements of the Public Transportation and Highway Improvement Act, MTO's Highway Access Management Policy and all related policies. The following outlines our comments.

Highway 6 along the subject property is a **Class 1A - Freeway** with a posted speed of 100 km/hr, and is designated as a **Controlled Access Highway** (CAH). As such, all requirements, guidelines and best practices in accordance with this classification and designation shall apply.

The owner should be aware that the property falls within MTO's Permit Control Area (PCA), and as such, MTO Permits are required before any demolition, grading, construction or alteration to the site commences. In accordance with the Ontario Building Code, municipal permits may not be issued until such time as all other applicable requirements (i.e.: MTO permits/approvals) are satisfied. As a condition of MTO permit(s) MTO will require the following for review approval:

In response to the Township's review process, MTO provide the following:

1. Additional Requirements – MTO has no objections in principle to the OP/ZB changes. The application is complete from an Official plan and Zoning By-Law perspective. There are no other additional requirements at this time to deem the OP/ZBA application complete.
2. Application Support – MTO has completed a review of the TIS dated February 7, 2025,

This development will be impacting MTO's ramp terminals at Mid-Block interchange and service road intersection with Wellington Rd 34. The area is a low traffic area (LOC A-C on ramps and LOC E or better on connector road / Wellington Rd 34 intersection). The proposed development is affecting in such a way that the level of service with the development traffic remains acceptable (LOS C or better on ramps and LOC E or better at connector road / Wellington Rd 34 intersection).

However, MTO has following comments for the TIS;

- The development will be in 3 phases. We require the TIS analyzing each phase separately.
- 3.1 - Existing Road Network - There are many omission/errors in the

statements. For example the report says “Wellington Road 35 has a two-lane rural crosssection.

- Its intersections with Sideroad 20 is unsignalized” where as the two roads are parallel. There are many more confusing statements like this.
- The data is collected by a Non-RAQS qualified firm, which is not acceptable.
- Data is collected in February 24 which needs to be converted to summer counts.
- Lane configuration in Fig 8 for proposed service road and connector road is incorrect. The third leg on the intersection is supposed to be the new proposed link and not the connector road (as shown in the report).
- Trip generation – While we appreciate that the higher rates are used for trip generation; there is no consistency among choosing Fitted Curve Equation vs Average Rate. Explanation required.
- The report doesn’t discuss pass-by and/or internal capture trips.
Table 2 – Just 10% of the trips are assigned to Hwy 6 which we consider will be a direct and faster route. Rationale be provided how most of the trips will be using Downey Road.
- The report doesn’t include traffic counts at MTO ramp terminals.
- Synchro Analyses
 - The layout doesn’t match with geometric configuration especially at midblock interchange.
 - Peak Hour Factor (PHF) to be taken as 0.88 max or the actual one to represent rural conditions.
 - Similarly saturation flow to be taken ideally as 1680 vph.
- Queuing analyses at the signalized intersections under MTO jurisdiction to be carried out using MTO’s Traffic Signal Operations & Timing Policy.
- The report doesn’t address traffic conditions for LOS E. Provide remedial measures.

MTO requires an updated TIS to address the above comments/concerns. These comments and concerns can be addressed during the Site Plan application stage.

3. If you support the application – MTO supports the ZBA, However TIS concerns must be address during the Site Plan Application stage for the proposed development and before MTO permits and other site plans conditions are approved.
4. If you cannot support the application. See item 3.
5. Are there any technical items required to support the application – At this time MTO requires no other additional technical items to support the ZBA application, however MTO will require an updated TIS to address the above comments/concern during the Site Plan application stage.

Please let me know if require further information or clarifications.

Regards,

O’Neil K. Nembhard
Corridor Management Planner
Highway Corridor Management Office
West Region