



Comment Summary – ZBA – 4631 Sideroad 20 N.– 1st submission

Revised April 25, 2025 with GRCA Comments

| 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 | See letter attached |
| Sourcewater | See letter attached |
| MTO | No comments |
| County of Wellington Roads | See letter attached |
| County of Wellington Planning | - 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 |

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| | <p>need for any additional studies and/or signed versions of the submitted plans</p> <ul style="list-style-type: none"> - We recommend coordinating deeming the application complete with the County Planning Office - We will share a copy of the acknowledgement letter for OPA once it is issued. - 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. - Elevation Drawings and a compatibility assessment were also not submitted |
| Township of Puslinch Fire Department – Jamie MacNeil | No comments |
| Township of Puslinch Building Department – Andrew Hartholt, CBO | <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> A. An Ontario Building Code (OBC) matrix for each proposed building. B. Building Height and storey's 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 |

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| | <p>meters of every portion of a building perimeter that is required to face a “street”.</p> <p>F. Show designated fire routes.</p> <p>G. Principal entrances to buildings to be identified.</p> <p>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.</p> <p>I. Sizing, calculations and location of on-site water storage to meet OBC.</p> <p>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.</p> <p>K. Identify snow storage locations</p> <p>L. Roof drainage flow control does not appear to be used. If this change 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).</p> <p>M. Provide engineer details for any retaining walls proposed.</p> |
| Township of Puslinch By-law Enforcement | No comments |
| Township of Puslinch Public Works – Mike Fowler | No comments |



March 28, 2025

Lynne Banks
7404 Wellington Road 34,
Puslinch, Ontario

Dear Lynne Banks,

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

NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a Zoning By-law Amendment Application proposing a large-scale prestige employment campus intended to accommodate a range of industrial 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, 66 loading spaces and 25 bicycle parking spaces.

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

- Concept Plans prepared by Sweeny&Co Architects, dated January 30, 2025;
- Cover letter prepared by MHBC, dated February 12, 2025;
- Environmental Impact Study prepared by GHD, dated February 7, 2025;
- Functional Servicing Report prepared by GHD, dated February 7, 2025;
- Grading and Servicing Plans prepared by GHD, dated December 4, 2025;
- Parcel Register;
- Planning Justification Report prepared by MHBC, dated February 2025;
- Public Strategy Consultation Form, dated February 9, 2025;
- Water Resources Impact Assessment, prepared by GHD, dated January 31, 2025;

- Source Water Protection Screening Form;
- Stormwater Management Report, prepared by GDH, dated February 7, 2025;
- Traffic Impact Study, prepared by GHD, dated February 7, 2025; and
- Urban Design Brief, prepared by MHBC, dated February 2025.

Determination of Completeness:

Based on a preliminary review, the application for Zoning By-law Amendment should be considered incomplete at this time.

Additional Requirements for Complete Application:

The following are a list of requirements for a Complete Application:

1. Land Use Compatibility Study

Section 6.8.3 of the County Official Plan indicates as follows:

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.

3. Archaeological Assessment

Pre-consultation notes indicate the requirement for an Archaeological Assessment.

All items identified above are included in Section 13.18 of the County Official Plan as studies that may be required.

Preliminary and Technical Comments:

The following is a list of preliminary and technical considerations for future submissions:

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

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. The study is available via the following link:

<https://puslinch.ca/wp-content/uploads/2025/02/Puslinch-by-Design-Phase-4-Land-Options-Report.pdf>

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. The Puslinch Design Guidelines can be accessed via the following link:

<https://puslinch.ca/wp-content/uploads/2022/07/Puslinch-Design-Guidelines-Feb-2010.pdf>

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
 - d. Include the legal name of the Subject Lands.
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.

Sincerely,



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

March 28, 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 1st Submission
4631 Sideroad 20 North (Estill Innovation Hub)
Puslinch, ON

Dear Ms. Banks:

GEI Consultants Canada Ltd. (GEI) have reviewed first submissions for Official Plan Amendment and Zoning By-Law Amendment applications received from the Township of Puslinch (Township) on March 12, 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.

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 February 12, 2025.
- Concept Plans, prepared by prepared by Sweeny & Co. Architects, dated February 7, 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 February 7, 2025.
- Functional Servicing Report, prepared by GHD, dated February 7, 2025.
- Grading and Servicing Plans, prepared by GHD, dated February 7, 2025.

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

- 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 February 2025.
- Traffic Impact Study, prepared by GHD, dated February 7, 2025.
- Environmental Impact Study (including Hydrogeological and Arborist Reports), prepared by GHD, dated February 7, 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. GEI would like to review Grand River Conservation Authority (GRCA) and Ontario Ministry of Transportation (MTO) comments when available.

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 | <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. |

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| 2. | Fire Water Storage Tanks | Functional Servicing Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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.</p> |
| 3. | General Site Information | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>The final paragraph of Section 2.2 should be updated with the most recent groundwater level information.</p> |
| 4. | Rainfall Parameters | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 5. | PCSWMM Model | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 6. | Sediment Drying Area | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>Please consider the inclusion of a sediment drying area as per Table 4.6 in the MOE SWMP Manual (2003).</p> |
| 7. | Permanent Pool Volume | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 8. | Pond Slopes | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 9. | Pond Freeboard | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 10. | Pond Outlet Orifice | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |

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| 11. | Forebay Design | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 12. | Infiltration System Configuration | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 13. | Infiltration System Quality Control | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 14. | Water Balance Assessment | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 15. | Drawdown Times | Stormwater Management Report | <p><u>GEI Comment (March 28, 2025)</u></p> <p>Please provide drawdown times for the SWM pond and infiltration galleries.</p> |
| 16. | GRCA Regulation Limit | Grading and Servicing Plans | <p><u>GEI Comment (March 28, 2025)</u></p> <p>Please show and label the GRCA regulation limit on all drawings.</p> |
| 17. | Maintenance Access Road | Grading and Servicing Plans | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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> |
| 18. | Drainage Area Linework | Grading and Servicing Plans | <p><u>GEI Comment (March 28, 2025)</u></p> <p>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</p> |

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| | | | 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. |
| 19. | Septic System Area | Grading and Servicing Plans | <u>GEI Comment (March 28, 2025)</u> Storm Drainage Area Plan #2 shows a septic system area of 1800 m ² and an available cistern area of 4346 m ² . Since the entire septic system area appears to be 4346 m ² , then the available cistern area is less than this. It should also be noted that the stone area has been preliminarily calculated as 1800 m ² , but the sand area would be 3375 m ² based on those assumptions. |
| 20. | Gross Construction Areas | Site Plan | <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. |
| 21. | Inconsistencies | Functional Servicing Report, Stormwater Management Report | <u>GEI Comment (March 28, 2025)</u> 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 332.68 m while Table 5 indicates 332.86 m. |

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

Sincerely,

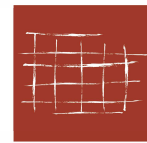
GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
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TRAIL SYSTEMS
GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION
OLT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

March 28, 2025

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

Lynne Banks
Township of Puslinch
7404 Wellington Rd. 34
Puslinch, ON N0B 2J0

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

Dear Ms. Banks:

Aboud & Associates Inc. (AA) has been retained by the Township of Puslinch to provide a peer review of the Environmental Impact Study (EIS) for the Estill Innovation Community completed by GHD (2025). This letter has reviewed the completeness of the application, identified additional requirements, and provides a technical comment matrix and checklist, included as appendix 1 and 2.

The proposed Estill Innovation Community is located at 4631 Side Road 20 N in the Township of Puslinch. The EIS was completed to document the existing natural heritage features and functions, assess potential impacts resulting from the proposed development and provide mitigation recommendations to minimize potential impacts. AA has reviewed the EIS completed by GHD (dated: January 31, 2025) for the proposed development. The following documents were received from the Township of Puslinch and reviewed for context.

- Sweeny & Co Architects. 2025. Site Plan, Context Plan, Area Statistics. February 7, 2025.
- GHD. 2025. Functional Servicing Report 4631 Sideroad 20 North, Township of Puslinch, Ontario. February 7, 2025.
- GHD. 2025. Estill Innovation Hub Project Support Site Servicing & Grading Plans. January 2025.
- GHD. 2025. Stormwater Management Report Estill Innovation Community. February 7, 2025.
- MHBC. 2025. Official Plan and Zoning By-law Amendment Applications 4631 Sideroad 20 North, Township of Puslinch.
- MHBC. 2025. Planning Justification Report 4631 Sideroad 20 North.

Background

Based on a review of the documents listed above, it is the understanding of AA that the EIS (GHD, 2025) was completed in support of Official Plan and Zoning By-law Amendment applications for the subject property to facilitate the development of the subject property as an innovative employment campus. The proposed development as identified on the Site Plan (Sweeny & Co Architects, February 2025) includes five buildings, 894 car parking spaces, trailer parking spaces, short term bike spaces, a trail network, a septic field, and a stormwater management pond.

Methodology

The peer review was completed as a 'desktop review'. No site visit was conducted by AA as part of the review of the EIS. The peer review was completed based on company experience and knowledge, standards for Environmental Impact Studies in the Township of Puslinch, Wellington County and the jurisdiction of the GRCA, industry accepted methodology, and the requirements of federal, provincial and municipal policy documents. *Table 1* details the findings of our review regarding the presence of natural features and applicable federal, provincial and municipal policies.

Table 1. Constraint Review

| Legislation | Policy Constraint Present | Study Requirement |
|--------------------------------------|---|--|
| Provincial Planning Statement (2024) | The MNRF Make-a-Map application identifies the presence of the Provincially Significant Cranberry Oil Well Bog Wetland Complex | ELC, botanical inventory, amphibian surveys. |
| Endangered Species Act (2007) | <p>Our Species at Risk review of the NHIC 1km squares has identified the following species within the 1km squares (17NJ6414, 17NJ6413, 17NJ6514 & 17NJ6513) containing the subject site:</p> <ul style="list-style-type: none"> - Grasshopper Sparrow - Midland Painted Turtle - Snapping Turtle - Wood Thrush - Eastern Wood-pewee - Western Chorus Frog - American Burying Beetle - Eastern Meadowlark - Bobolink - Bank Swallow <p>Additionally, bat species at risk may occur anywhere with trees and/or buildings meeting their habitat requirements. Per our desktop review, habitat for Species at Risk birds, bats, reptiles and amphibians may be present within the subject site. Any present trees >10cm diameter at breast height proposed for removal on site should be considered for bat species at risk maternity habitat.</p> | Breeding Bird surveys, amphibian surveys, bat maternity habitat surveys, bat acoustic surveys. |
| Fisheries Act (2019) | No waterbodies or watercourses identified within the limits of the subject property. | N/A |
| Species at Risk Act (2002) | Habitat for migratory bird Species at Risk may occur within the limits of the subject property. | Breeding bird surveys. |

| Legislation | Policy Constraint Present | Study Requirement |
|--|---|---|
| Migratory Birds Convention Act (1994) | Habitat for migratory birds listed under the Migratory Birds Act may occur within the limits of the subject property. | Breeding bird surveys. |
| Ontario Regulation 41/24 | The subject property includes a portion of the Provincially Significant Cranberry Oil Well Bog Wetland Complex and its associated regulated area. | Wetland limit verification. |
| County of Wellington Official Plan (2024) | Per Schedule B7 of the Official Plan, the subject property contains lands designated as Core Greenlands. The lands are associated with the Provincially Significant Cranberry Oil Well Bog Wetland Complex. | ELC, botanical inventory, wetland limit verification. |
| Township of Puslinch Zoning By-law 023-18 (2024) | Per Schedule A of the Zoning By-law, the subject property contains lands zoned as Natural Environment. The lands are associated with the Provincially Significant Cranberry Oil Well Bog Wetland Complex. | ELC, botanical inventory, wetland limit verification. |

Comments on Reviewed Materials

A summary of the issues requiring additional information and/or clarification that we have identified for the EIS (GHD, 2025) are provided below. Additionally, a comment matrix has been provided that includes the comments and space for the applicant's response.

Environmental Impact Study

Study Approach & Methodology

Through review of the EIS, discrepancies were identified in some of the protocols used and timing windows adhered to, specifically for Bat Maternity Habitat Assessments and Amphibian Surveys. The Bat Maternity Habitat Assessments were not completed using the most up-to-date protocol, "Bats and Treed Habitats- Maternity Roost Surveys", produced by MECP (2022). Amphibian surveys completed in 2024 did not include a field survey between May 15-30 as specified within the Marsh Monitoring Program (Birds Canada, 2008), please provide justification for these discrepancies. Field investigation details should also include weather conditions at the time of the survey, including temperature, wind and precipitation.

The study area identified for the EIS includes the subject property and 120m from the limit of the subject property; however, per Figure 2, Ecological Land Classification community codes were only assigned to vegetation features within the limits of the subject property. The Natural Heritage Reference Manual (OMNR, 2010) states that vegetation communities within 120m of proposed development or site alteration are to be identified and delineated using Ecological Land Classification to the community series or ecosite level. Where access is restricted, information is to be obtained from the roadside, limits of the subject property, or through interpretation of aerial imagery.

Significant Wildlife Habitat Assessment

Per the EIS, investigations for evidence of Significant Wildlife Habitat (SWH) per the SWH Criteria Schedules for Ecoregion 6E occurred during field surveys; however, an assessment of the presence of all categories of SWH was not completed. Furthermore, the SWH analysis in Table 5.1 did not align with verbiage included in Section 7.2 which identified the potential SWH for Special Concern and Rare wildlife species including Monarch, Eastern Milksnake, and Eastern Ribbonsnake as well as reptile hibernacula. A comprehensive assessment for all categories of SWH within the SWH Criteria Schedules for Ecoregion 6E is to be completed for the study area and included as an appendix, specific to the study, within a revised report or addendum submission. Additional revisions to subsequent report sections, including potential impacts and mitigation as a result of the SWH assessment.

Species at Risk Bats

The recently Listed Eastern Red Bat, Hoary Bat, and Silver-haired bat do not form maternity colonies and have different habitat needs than colony forming species, instead roosting in the foliage of deciduous and coniferous trees. As a result, the snag habitat studies completed are insufficient to determine the potential presence of habitat and impacts to the generalized habitat for these species. The report must be revised to discuss impacts to the habitat of these species

separately from maternity colony forming species, as well as consideration for roosting habitat, as a result of the proposed work. This may include additional studies to determine the presence of candidate trees for these species specifically.

Per the provided figures, bat acoustic surveys were only completed in the vicinity of CT3, please provide justification for the lack of detectors within the northern portion of the site.

Impact Assessment & Mitigation Recommendations

The impact assessment provided considers direct and indirect impacts for short- and long-term timelines; however, the consideration for cumulative impacts over time also needs to be discussed.

The mitigation recommendations provided in Section 7.2.2 fail to consider all confirmed or potential natural heritage constraints identified through field investigations. As Eastern Meadowlark was observed and exhibited probable breeding evidence the appropriate mitigation measures for Eastern Meadowlark per the Endangered Species Act (2007) need to be included and discussed in regards to the proposed development. As Eastern Red Bat, Hoary Bat & Silver-haired Bat do not form maternity colonies, the mitigation measures identified, such as a bat box, will not benefit these species. Please provide additional mitigation measures specific for solitary roosting species.

Policy & Legislative Compliance

Based on the discrepancies identified above, revisions to Table 8.1 are necessary to demonstrate compliance with all applicable policies. The County of Wellington Official Plan (2024) includes Habitat of Endangered or Threatened Species and Significant Wildlife Habitat within Core Greenlands and Greenlands, respectively. Rationale for how the proposed development is in compliance with the County of Wellington Official Plan (2024) in regard to both Core Greenlands and Greenlands is required.

Figures & Appendices

Figures included in the report require revisions, including the addition of the locations of grassland bird transects, habitat mapping for Endangered Species habitat, and habitat mapping for Significant Wildlife Habitat. ELC mapping should include a cartographic scale, additionally, text size and symbols should be legible and not overlapping.

Additional appendices are required including, site investigations details, a background wildlife list based on wildlife atlas results, a comprehensive assessment of SWH, and ELC data cards for all communities inventoried including representative photos of each community.

Conclusion

In conclusion, our review of the submitted EIS and supporting documents has determined that additional details are required to fully assess the potential impacts of the proposed development. This additional information will include clarification of methodology for field investigations, provision of Ecological Land Classification for the entirety of the study area, further assessment of the presence of Significant Wildlife Habitat, revised mitigation measures based on the confirmation of Species at Risk within the limits of the subject property and further detail regarding how the proposed development complies with all applicable policies.

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

Yours truly,

ABOUD & ASSOCIATES INC.



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

&



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

Attachments:

- Appendix 1. Comment Matrix
- Appendix 2. Peer Review Checklist

S:\A+A Projects\2021\Approved\21-049A Puslinch Peer Review\AA File\21-049A-011 4631 Sideroad 20 N\Report\EIS submission By-law submission\AA21-049A-011 4631 Sideroad 20 N EIS Peer Review .docx

| Estill Innovation Community, Environmental Impact Study- Comment/Response Matrix | | |
|--|---|----------------------|
| Comment # | 1st Submission Comment | Applicant's Response |
| Section 1- Introduction | | |
| Section 2- Policy Framework | | |
| Section 3- Study Approach and Methodology | | |
| 1 | Section 3.1 - Background review should also include the following resources: iNaturalist Ontario Butterfly Atlas | |
| 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. | |
| 3 | Define how transects for grassland birds were established and their locations. | |
| 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. | |
| 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. | |

| | | |
|--|---|--|
| 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 for habitat for these species within the project study area. | |
| 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. | |
| 8 | section 3.4.10 - please provide the SWH screening assessment completed specific to the site. | |
| 9 | Section 3.4.11- SCC species also include species with an S-Rank of S1-S3. Please revise this section include this criteria. | |
| 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. | |
| 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. | |
| Section 5- Significant Natural Heritage Features | | |

| | | |
|---|--|--|
| 12 | <p>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 to not meet the criteria. This assessment is to be included as an appendix.</p> | |
| 13 | <p>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 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.</p> | |
| Section 6- Description of Development | | |
| Section 7- Impact Assessment and Mitigation | | |
| 14 | <p>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.</p> | |

| | | |
|--|---|--|
| 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 defining 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). | |
| 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 figures and appropriate mitigation required under the ESA. | |
| 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. | |
| 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. | |
| 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. | |

| | | |
|------------------------|---|--|
| 20 | <p>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.</p> | |
| 21 | <p>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, were 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.</p> | |
| Section 9- Conclusions | | |
| 22 | <p>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.</p> | |

| | | |
|------------------------|--|--|
| 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. | |
| Section 10- References | | |
| 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 same 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. | |
| 26 | Figure 2- Please include the 100m radius circles for the Breeding Bird survey point count locations. | |
| 27 | Figure 2- Please include the grassland bird survey transects. | |
| 28 | Figure 3- Please include the identified habitat for Species at Risk birds and bats. | |
| 29 | Figure 3- Please include the confirmed/assumed SWH. | |
| 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. | |
| 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. | |
| 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. | |
| 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). | |
| 34 | Please provide an appendix including an ELC data card for each community inventories on site, including representative photos of each community. | |

Applicable Legislation Assessment:

| LEGISLATION | APPLICABLE | COMPLETE |
|---|-------------------------------------|-------------------------------------|
| MBCA (Migratory Bird Convention Act) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fisheries Act | <input type="checkbox"/> | <input type="checkbox"/> |
| SARA (Species at Risk Act) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ESA (Endangered species Act) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| PPS (Provincial Planning Statement) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Fish & Wildlife Conservation Act | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Conservation Authorities Act R.S.O. 1990, O. Reg. 41/24 | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Grand River Conservation Authority | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Township of Puslinch Zoning by-law | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Wellington County Official Plan (2024 Consolidation) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Background Review Assessment:

| SOURCE | COMPLETE |
|---|-------------------------------------|
| MECP Request for Information | <input checked="" type="checkbox"/> |
| MNRF Request for Information (Aquatic/ANSI/Wetlands) | <input checked="" type="checkbox"/> |
| NHIC (Natural Heritage Information Center) for restricted species | <input checked="" type="checkbox"/> |
| Ontario Breeding Bird Atlas | <input checked="" type="checkbox"/> |
| Ontario Reptile & Amphibian Atlas | <input checked="" type="checkbox"/> |
| Ontario Mammal Atlas | <input checked="" type="checkbox"/> |
| Ontario Butterfly Atlas | <input type="checkbox"/> |
| DFO Aquatic species at risk mapping | N/R |
| Locally significant species lists: Local Status Wellington Dufferin | <input checked="" type="checkbox"/> |
| GIS sources: LIO woodlands, wetlands, Fish dot mapping etc. | <input checked="" type="checkbox"/> |
| CA sources: open data, REST servers | <input checked="" type="checkbox"/> |
| Subwatershed study/natural heritage strategy (if available) | N/R |
| Ebird | <input checked="" type="checkbox"/> |
| iNaturalist | <input type="checkbox"/> |

Desktop Screening analysis:

| Screening | COMPLETE |
|--|--------------------------|
| Candidate Significant Wildlife Habitat | <input type="checkbox"/> |
| Candidate Species at Risk Habitat | <input type="checkbox"/> |

Field Studies Assessment:

| STUDY | RECOMMENDED | COMPLETE |
|--------------------------------|-------------------------------------|-------------------------------------|
| Ecological Land Classification | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Spring Botanical | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Summer Botanical | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fall Botanical | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Breeding Birds | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Grassland Breeding Bird | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

| STUDY | RECOMMENDED | COMPLETE |
|--|-------------------------------------|-------------------------------------|
| Marsh Breeding Birds | <input type="checkbox"/> | <input type="checkbox"/> |
| Stick nest survey | <input type="checkbox"/> | <input type="checkbox"/> |
| Woodpecker nesting assessment (pileated, red-headed) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Amphibian Call count surveys | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wetland Delineation | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wetland Assessment | <input type="checkbox"/> | <input type="checkbox"/> |
| HDF Assessment | <input type="checkbox"/> | <input type="checkbox"/> |
| Aquatic Habitat Assessment | <input type="checkbox"/> | <input type="checkbox"/> |
| Mussel assessment/sampling | <input type="checkbox"/> | <input type="checkbox"/> |
| OBBN/ Benthic sampling | <input type="checkbox"/> | <input type="checkbox"/> |
| Woodland Significance Assessment | <input type="checkbox"/> | <input type="checkbox"/> |
| Woodland Dripline Delineation | <input type="checkbox"/> | <input type="checkbox"/> |
| Bat Maternity Habitat Assessment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Bat Acoustic/Exit Survey | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Snake surveys (visual encounter/cover boards) | <input type="checkbox"/> | <input type="checkbox"/> |
| Turtle Overwintering/nesting | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Salamander breeding | <input type="checkbox"/> | <input type="checkbox"/> |
| Winter Raptors | <input type="checkbox"/> | <input type="checkbox"/> |
| Winter Wildlife | <input type="checkbox"/> | <input type="checkbox"/> |
| Songbird Migration | <input type="checkbox"/> | <input type="checkbox"/> |
| Waterfowl Migration | <input type="checkbox"/> | <input type="checkbox"/> |
| Butterfly/odonate/pollinator study | <input type="checkbox"/> | <input type="checkbox"/> |
| Linkage Assessment | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Terms of Reference submission Review:

| COMPONENT | COMPLETE |
|---|-------------------------------------|
| Submitted to Municipality & CA (as applicable) | <input checked="" type="checkbox"/> |
| Includes all applicable Legislation | <input checked="" type="checkbox"/> |
| Includes a Figure with the proposed study area | <input checked="" type="checkbox"/> |
| Background review and screening complete to inform field scope | <input checked="" type="checkbox"/> |
| Field studies included appropriate to site conditions, proposal and scoping | <input checked="" type="checkbox"/> |

REPORT SUBMISSION REVIEW**Report Assessment:**

| COMPONENT | COMPLETE |
|---|-------------------------------------|
| The report adequately describes the proposed development | <input checked="" type="checkbox"/> |
| Describes existing land use, conditions, and surrounding landscape features | <input checked="" type="checkbox"/> |
| Describes all NH constraints & background review information | <input checked="" type="checkbox"/> |
| Summarizes all correspondence with agencies, TOR | <input checked="" type="checkbox"/> |
| All Sources included and documented in references | <input type="checkbox"/> |
| Field work completed within last 5 years | <input checked="" type="checkbox"/> |
| All Applicable policy is included | <input type="checkbox"/> |

| | |
|---|-------------------------------------|
| Field surveys completed following an industry accepted protocols (e.g. OBBA Breeding Bird Protocol, Marsh Monitoring Protocol for Amphibians, OWES, MNRF/MECP species-specific protocols) | <input type="checkbox"/> |
| Buffers to natural heritage features are included and justified | <input checked="" type="checkbox"/> |
| constraints on site adequately described, assessed, and impacts mitigated | <input type="checkbox"/> |
| Figures are concise and display all necessary information for the site | <input type="checkbox"/> |
| Consistency between results and conclusions, consideration between for data collected and the report. | <input type="checkbox"/> |
| All potential impacts to natural features or ecological functions are discussed | <input type="checkbox"/> |
| Justifications of impact are adequately supported by sources | <input type="checkbox"/> |
| Justification provided for meeting policy goals | <input type="checkbox"/> |
| Reference existing conditions noted in associated reports (i.e., proposed grading, servicing, stormwater management) | <input type="checkbox"/> |
| The effects of other relevant studies have been discussed | <input type="checkbox"/> |
| Mitigation recommendations are sound and adequately address impacts | <input type="checkbox"/> |

Standard Appendices included and complete:

| | |
|--|-------------------------------------|
| SAR Habitat Assessment | <input checked="" type="checkbox"/> |
| SWH Habitat Assessment | <input type="checkbox"/> |
| Site Investigation details (includes dates, weather, and staff) | <input type="checkbox"/> |
| Agency communication | <input checked="" type="checkbox"/> |
| Background Wildlife List | <input type="checkbox"/> |
| Botanical species List | <input checked="" type="checkbox"/> |
| Wildlife species lists (Breeding birds, fish, amphibians etc. as needed) | <input type="checkbox"/> |
| Ecological Land Classification forms and community photos | <input type="checkbox"/> |
| Field forms appended or digitized | <input type="checkbox"/> |



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

March 27, 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
1st 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.

See Above.

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

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.
- 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.
- 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.

Sewage Disposal

- 4) 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. It should be clarified if this is total nitrogen or nitrate.
- 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.
- 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.

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 on-site wetland.
- 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?

- 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 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 surface water/groundwater relationship in the wetland is not well explained or 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 storm water (during major events) and roof leader water is 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.

Groundwater Quality

- 10) It is our observation that the groundwater sample obtained from MW10-23 has elevated concentrations of total aluminum, phosphorous, chromium, copper, iron and zinc. Unless the shallow groundwater is impacted by historical on-site activities, it appears to us that an 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 as to why the chloride concentration is as high as it is recorded. Is this from road salt at Sideroad 20N?

Functional Servicing Report

- 12) The main developable area of the site is internally draining as depression focussed recharge, largely occurring through the on-site wetland. In essence, there is no future off-site discharge of runoff from 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.

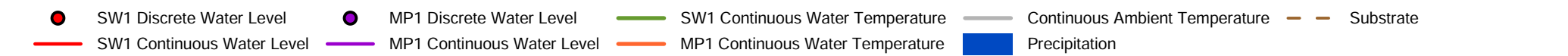
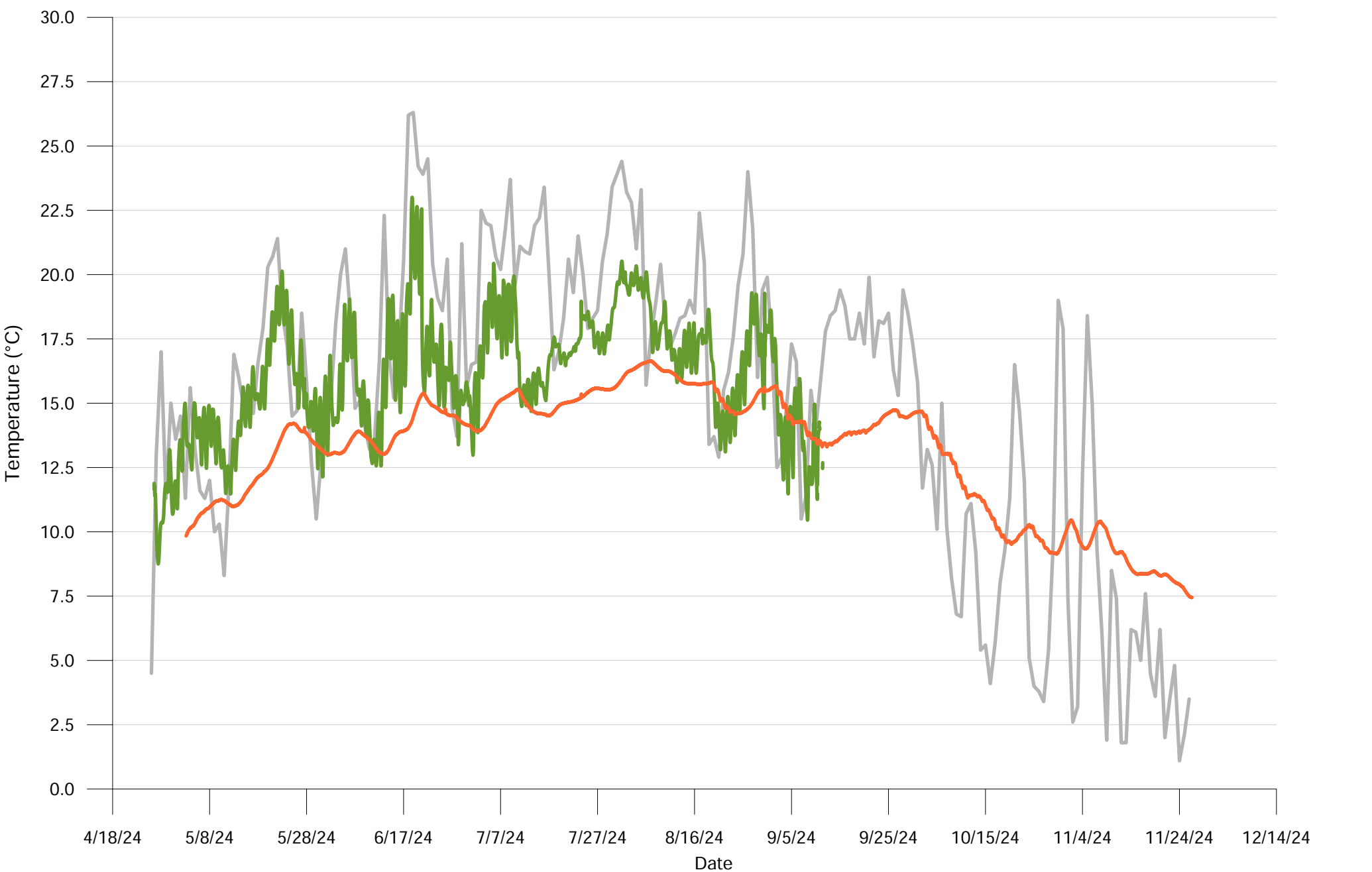
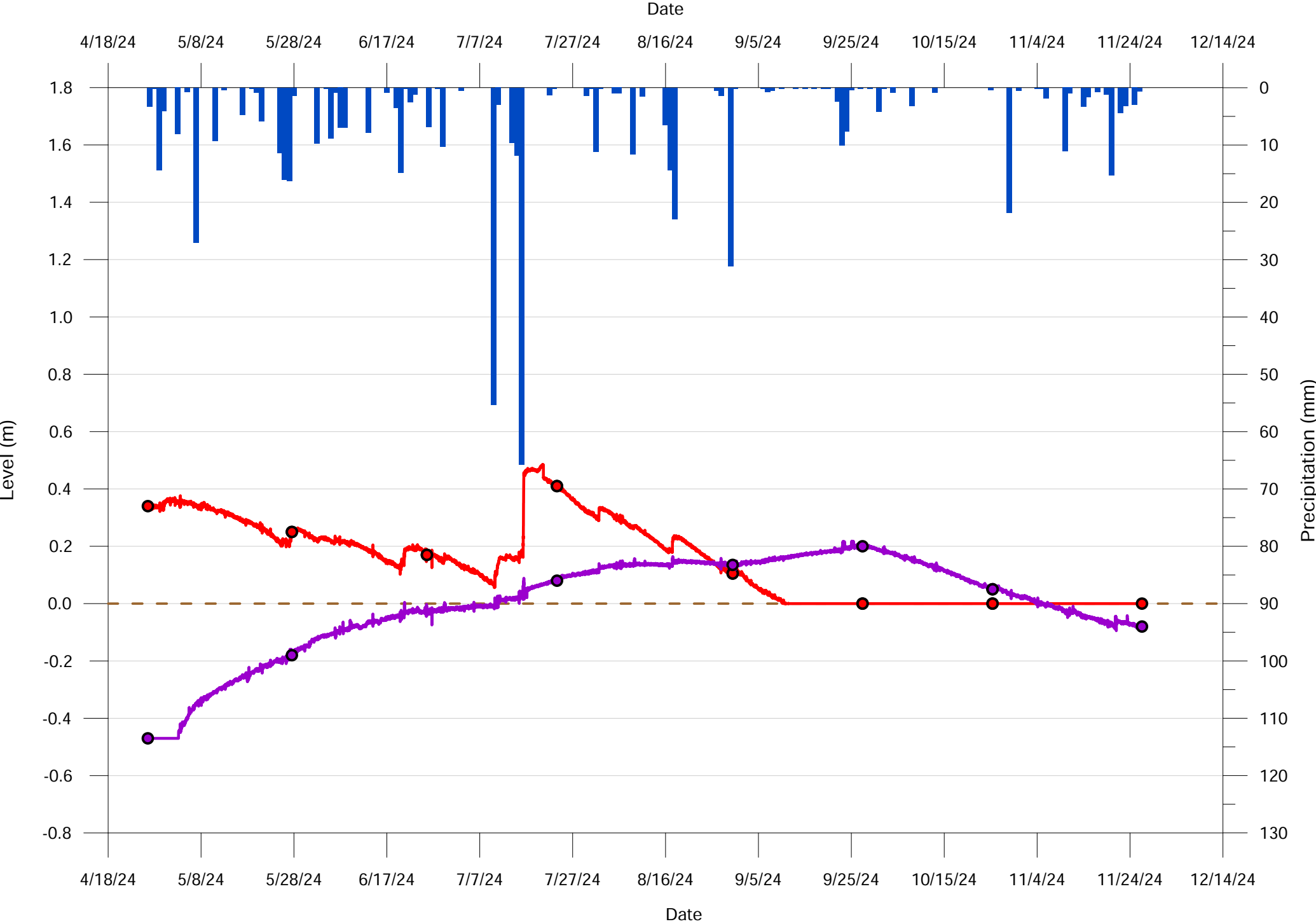
Water Balance

- 13) 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. It is not readily apparent as to why the infiltration for a smaller portion of the site of (wetland feature) has a greater loss of infiltration ($25,625 \text{ m}^3$) than that predicted for the entire site ($23,605 \text{ m}^3$). A clearer understanding of the relationship of the on-site wetland to the underlying groundwater system is needed.
- 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 pre development 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.

Harden Environmental Services Ltd.

A large black rectangular redaction box covers the signature area, with a small portion of a blue line visible on the right side.

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

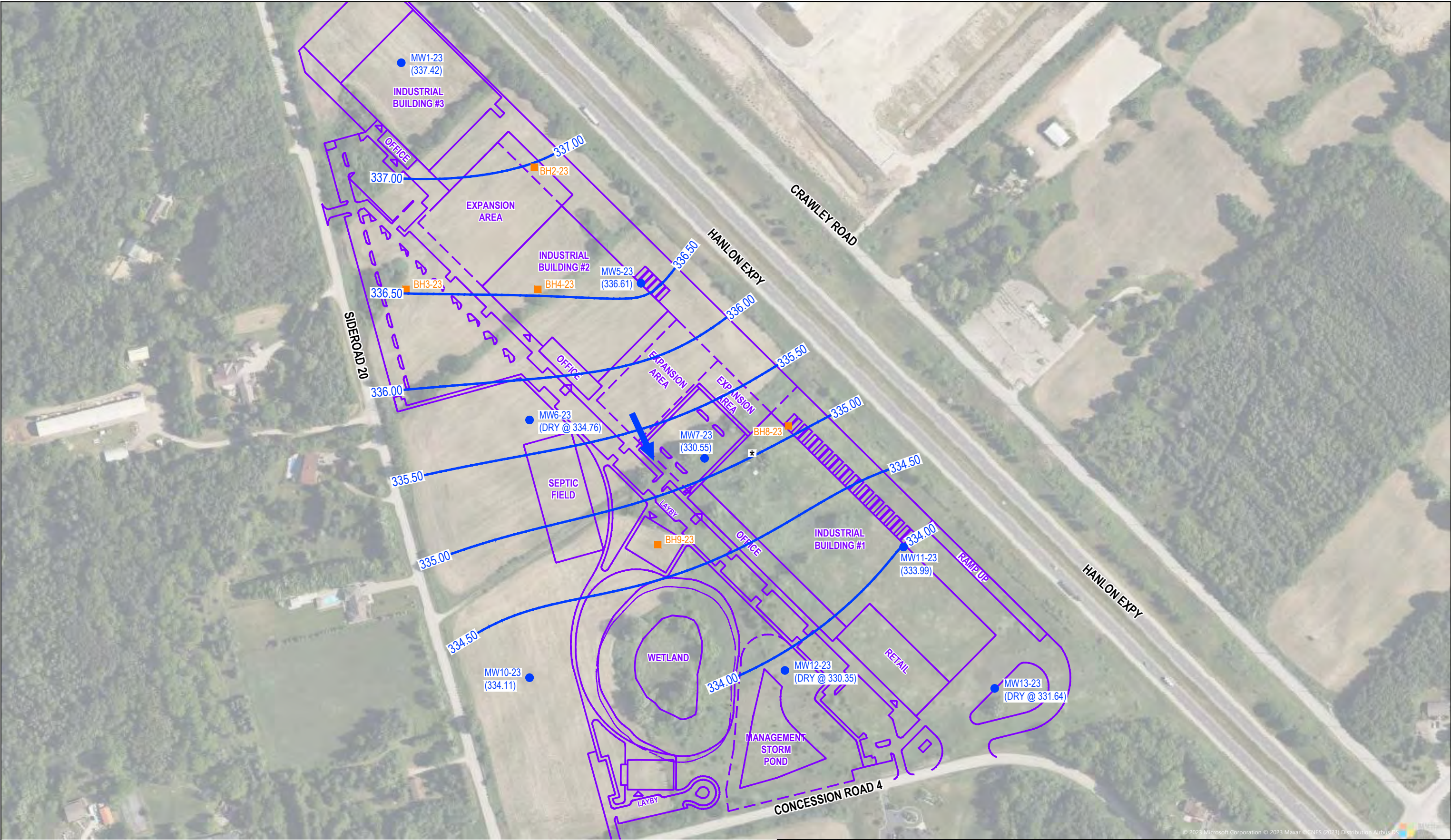


Notes:
- Precipitation and ambient temperature data provided from the Kitchener/ Waterloo (Climate ID: 6144239) Environment Canada weather station and supplemented with the Roseville (Climate ID: 6147188) Environment Canada weather station.
- Gaps in the continuous water temperature were caused by dry conditions.



PUSLINCH DEVELOPMENT LIMITED PARTERNSHIP
PUSLINCH, ONTARIO
SURFACE WATER ASSESSMENT
SW1/MP1 - SURFACE WATER HYDROGRAPH
AND TEMPERATURE DATA

Project No. 12618927
Date January 2025



●

MONITORING WELL LOCATION

■

BOREHOLE LOCATION

—

PROPOSED LAYOUT

(333.99)

DEPTH TO WATER (mAMS)

mAMS

METRES ABOVE MEAN SEA LEVEL

— 333.00 —

GROUNDWATER ELEVATION CONTOUR

→

GROUNDWATER FLOW DIRECTION

*

NOT USED IN GENERATING CONTOURS

0306090m

1:3000

Coordinate System:
UTM83-17

N

▲

GHD

PUSLINCH DEVELOPMENT GP INC.

4631 SIDEROAD 20 NORTH

PUSLINCH TOWNSHIP, ONTARIO

HYDROGEOLOGICAL INVESTIGATION

GROUNDWATER ELEVATION CONTOURS

(MAY 14, 2024)

Project No. 12618927

Date January 2025

FIGURE 4.4

Filename: \\ghdnet\ghd\CA\Waterloo\Projects\66212618927\Digital_Design\ACAD\Figures\IPT-Hydrogeol\12618927-GHD-00-00-RPT-EN-D104_WA-Hydrogeo.dwg
Plot Date: 30 January 2025 3:12 PM

Data Source: Proposed layout from Sweeny & Co Architects Inc.; DWG TITLE: Site Plan, Contact Plan, Area Statistics; DATE: 2025-01-27; PROJ. No.: 2421; DWG No.: AC103.

MEMORANDUM

TO: Lynne Banks, Development and Legislative Coordinator
lbanks@puslinch.ca

VIA E-MAIL

FROM: John Emeljanow

DATE: March 27, 2025

RE: Zoning By-Law Amendment Submission
4631 Sideroad 20 North, Township of Puslinch

FILE: 125-0015

Valcoustics Canada Ltd. has had the opportunity to review the materials submitted in support of the above noted application. The proposed development is considered a Stationary Noise Source according to the definitions in Ministry of Environment, Conservation and Parks (MECP) Publication NPC-300 and is located in close proximity to existing noise sensitive land uses whose sound emissions have the potential to adversely impact these existing noise sensitive land uses in the area.

The documents submitted to support the Zoning By-Law Amendment do not include a noise study. A noise study is needed to demonstrate compliance of the proposed facility with the existing noise sensitive land uses (i.e., existing residential dwellings to the south and west of the development site) and the proposed daycare on the development site itself. Since the proposed development also contains noise sensitive space (i.e., classrooms, offices, boardrooms, etc.), the noise study should also consider the potential noise impacts from the environmental noise sources (such as road traffic on Highway 6) on the proposed development itself to ensure the noise sensitive spaces can be appropriately protected.

As stated in the Planning Justification Report, a Land Use Compatibility Assessment that looks at noise and dust impacts from the proposed facility will be required due to the proximity of the site to existing sensitive land uses. It is agreed that such a study is required and will need to include a detailed noise impact assessment.

If there are any questions or if additional information is needed, please do not hesitate to call.

JEV
Application Review.docx



SALVINI
CONSULTING
Transportation Engineering and Planning

Salvini Consulting Inc.
185 Deer Ridge Drive
Kitchener, ON · N2P 2K5
519-591-0426
julia@salviniconsulting.com

March 28, 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), February 2025
Deem Application Complete, OPA and ZBA 1st Submission
Township Peer Review Comments**

Dear Lynne,

I've reviewed the February 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. The TIS addresses the scope that I asked for except that it is missing the sightline analysis at the site driveways as requested. 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. The application is not complete because the GHD TIS is missing the sightline analysis at the site driveways.
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.
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 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, in particular 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.

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

Sincerely,

[Redacted Signature]

Julia Salvini, MEng, PEng, FITE
President

Cc: Mike Fowler, Township of Puslinch
Justine Brotherston, Township of Puslinch
Pasquale Costanzo, Wellington County
Jeremiah Johnston, MTO
Andrea Reed, GEI Consultants





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

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

April 25, 2025
Via email

Lynne Banks, Associate Planner
Township of Puslinch
7404 County Road 34
Puslinch, Ontario, N0B 2J0

Dear Lynne Banks,

Re: Zoning By-Law Amendment Application
4631 Side Road 20 North, Township of Puslinch
Owner – Jim Estill (Puslinch Developments GP Inc.)

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted zoning by-law application to facilitate the development of the subject lands as an innovative employment campus.

Recommendation

The GRCA has no objection to the zoning by-law amendment application.

Documents Reviewed by Staff

Staff have reviewed the following documents submitted with this application:

- Cover Letter, prepared by MHBC, dated February 12, 2025
- Conceptual Site Plan, prepared by Swenny&Co Architects, dated January 30, 2025
- Functional Servicing Report, prepared by GHD Ltd., dated February 7, 2025
- Stormwater Management Report, prepared by GHD Ltd., dated February 7, 2025
- Grading and Drainage Plan, prepared by GHD Ltd., dated February 7, 2025
- Environmental Impact Study, prepared by GHD Ltd., dated February 7, 2025

GRCA Comments

GRCA has reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the Planning Act as per our CA Board approved policies.

Information available at this office indicates that a wetland and its regulated allowance is located within the subject property. As such, a portion of the property is regulated by the GRCA under Ontario Regulation 41/24. Any new development/site alteration within the regulated area will require the prior issuance of a permit from the GRCA. A copy of GRCA's resource mapping is attached to this letter.

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 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.

If the proposed development is located within GRCA's regulated area, we offer the following comments that will need to be addressed as part of a future site plan submission,:

3. 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.
4. The proponent must demonstrate how GRCA policies 8.4.9 and 8.4.14, for development activity within the area of interference for a wetland, can be met. A GRCA permit will be required for stormwater management works proposed within the GRCA regulation limit.
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.
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.
7. Infiltration rate unit in the soil infiltration rate assessment table should be revised on Page 23 of 98 of the SWM Report.
8. A runoff coefficient of 0.9 has been assigned to the open landscape and pervious subcatchment area should be explained, as indicated on Page 11/98 of SWM Report. This value appears to be unusually high and should be justified.
9. Whether the Concession Road 4 has the capacity to convey major storm discharge off site from the SWM pond, should be confirmed.
10. The Storm Water Management Report should be stamped by a qualified Professional Engineer.
11. An erosion and sediment control (ESC) plan, prepared by a licenced engineer will be required, including a dewatering plan.

Advisory Comments

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.

This application is considered a major zoning bylaw amendment application. Consistent with the GRCA's approved 2023-2025 plan review fee schedule, the applicant will be invoiced in the amount of \$2500 for the GRCA's review of this application.

Should you have any questions, please contact Ismet Esgin Zorlu (Resource Planner) at 519-621-2761 extension 2231 or iezorlu@grandriver.ca

Sincerely,



Chris Foster-Pengelly, M.Sc.
Supervisor of Planning and Regulations
Grand River Conservation Authority

Enclosed: GRCA Mapping, GRCA's pre-submission comments

Copy: Jim Estill, owner (via email)
Emily Elliot, MHBC, agent (via email)



GRCA Map

Legend

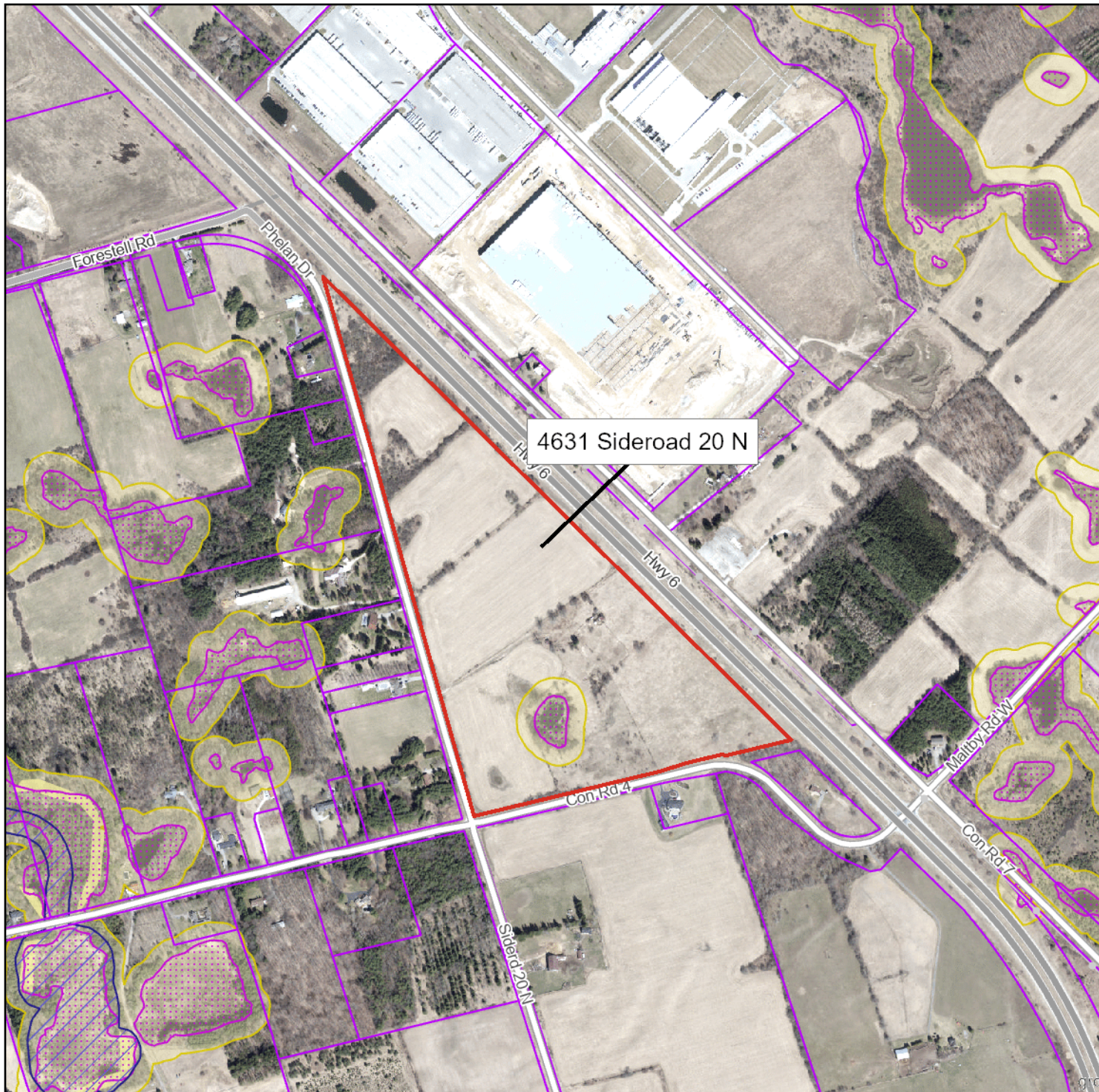
- Regulation Limit (GRCA)
- Floodplain (GRCA)
 - Engineered
 - Estimated
 - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
 - Steep
 - Oversteep
 - Toe
- Slope Valley (GRCA)
 - Steep
 - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Conservation Area Boundary (GRCA)

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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user. The source for each data layer is shown in parentheses in the map legend. See [Sources and Citations](#) for details.

Scale 1:9,368

NAD83 UTM zone 17 (EPSG:26917)



March 25, 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 1**

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 a 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 is currently proposing a deficit, with the acknowledgement that the report 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 and appropriate LID measures can be proposed.
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.

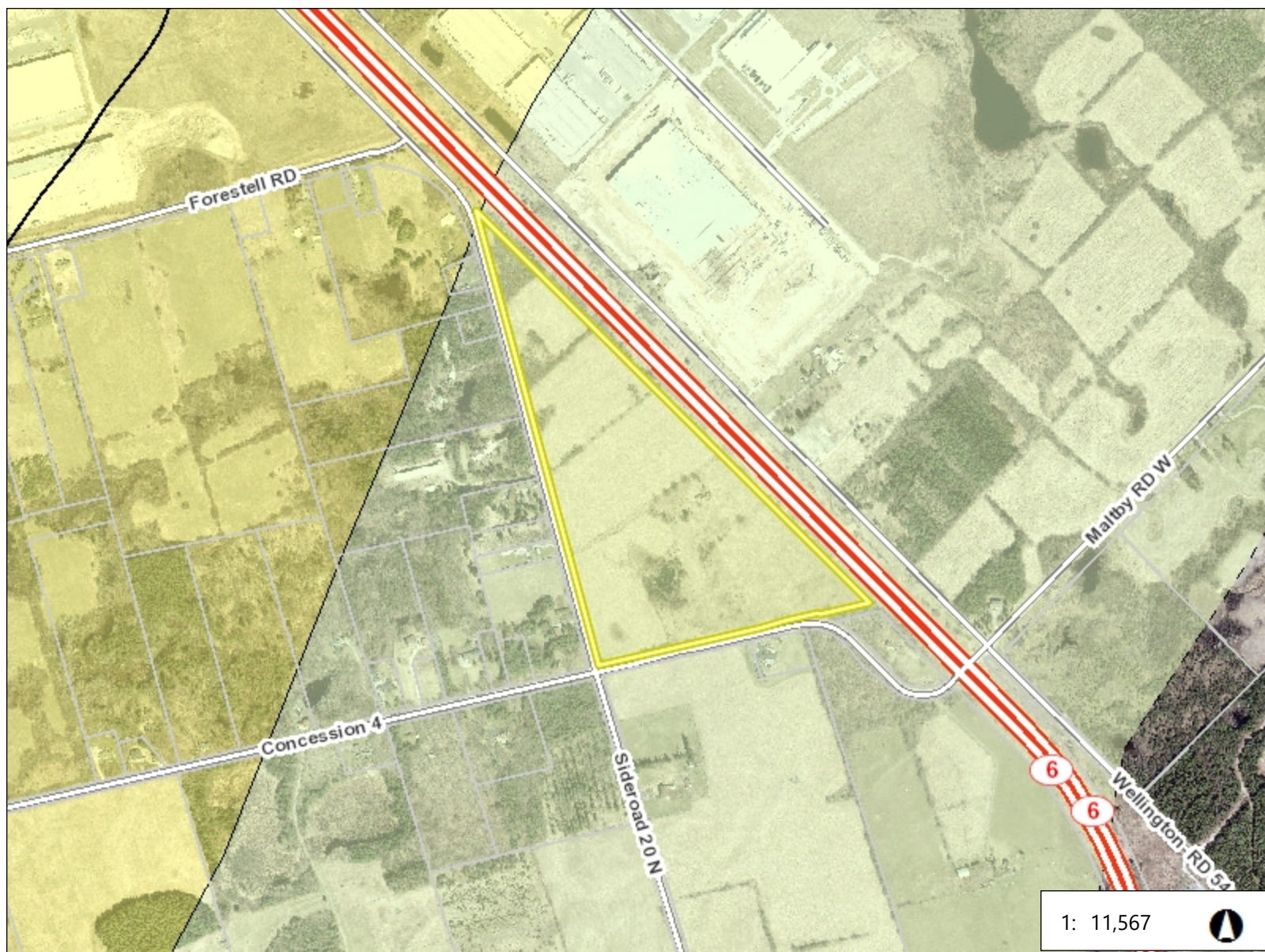
For more information, please contact sourcewater@centrewellington.ca.

Sincerely,

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

Attachments: Vulnerable Area Maps

Resources: [Appendix C: Guidance Documents](#)



Legend

□ Parcels

Roads

— Local Road

— County Road

— Highway

Well Locations

— Existing

— Proposed

Wellhead Protection Area

A

B

C

D

Vulnerability Score

10

8, D; 8; 8, C

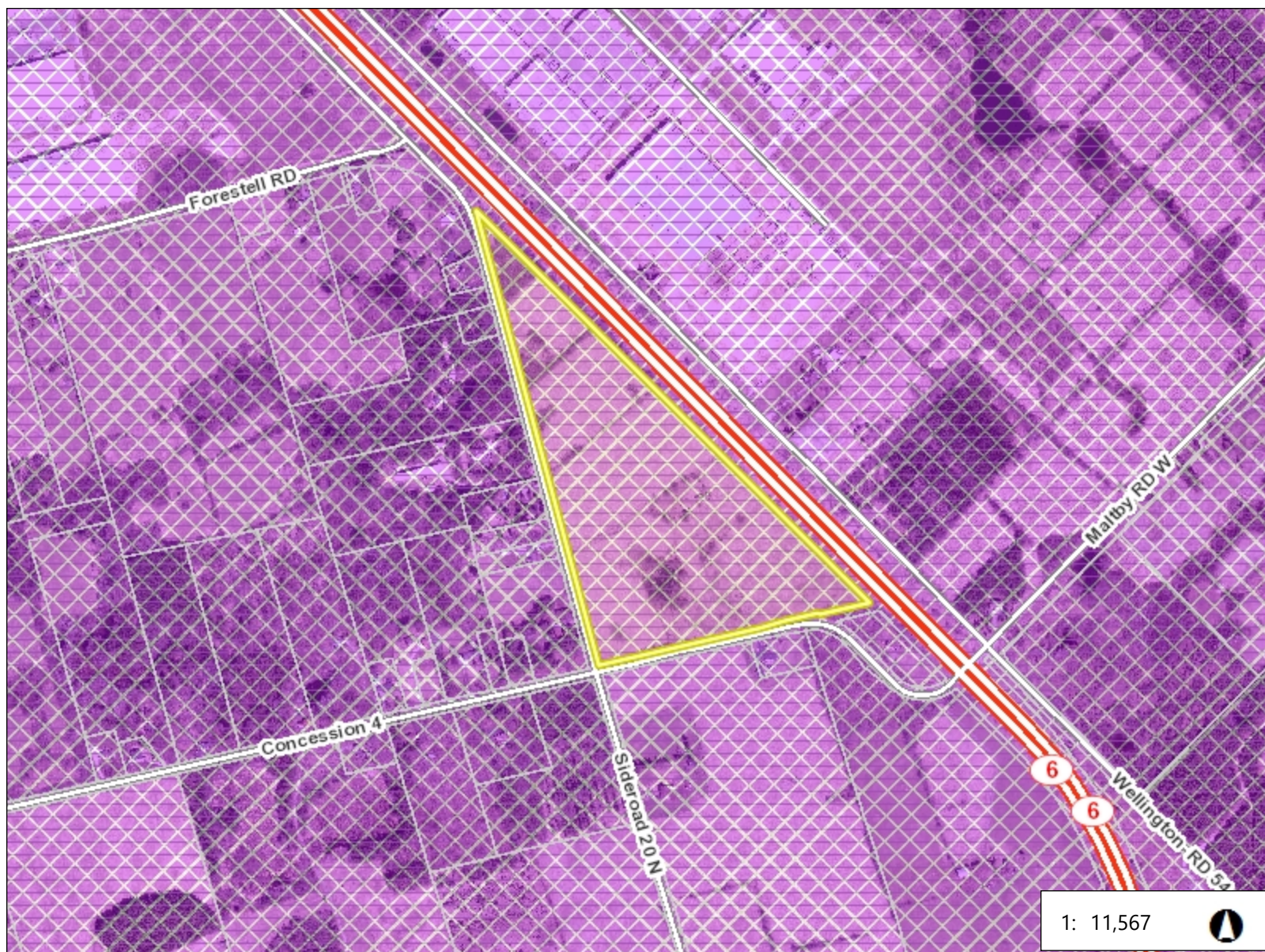
2, 4, 6 (A, B or C)

2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,

— HVA

0.6 0 0.29 0.6 Kilometers

Notes

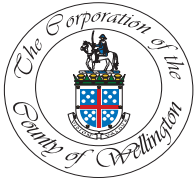


Legend

- Parcels
- Roads
 - Local Road
 - County Road
 - Highway
- Well Locations
 - Existing
 - Proposed
- WHPA Q1_Q2_Boundary
 - Approved
 - Draft
- SGRA

Notes

0.6 0 0.29 0.6 Kilometers



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74 WOOLWICH STREET
GUELPH, ONTARIO
N1H 3T9

MEMORANDUM

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

FROM: Pasquale Costanzo, Technical Services Supervisor – County of Wellington

RE: ZBA D14-DAN – 4631 Sideroad 20 North,
Puslinch Development GP Inc.

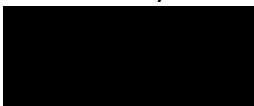
DATE: March 28, 2025

In reviewing the supplied documents for the above noted Zoning Bylaw Amendment, the County Roads have comments for the provided Traffic Impact Study. The report provides a Capacity Analysis of three County intersection Wellington Road 35/Downey Road at Forestell Road, Wellington Road 34 at Concession Road 4 and Wellington Road 35 at Side Road 20 N and highlights that the intersections would continue to operate at satisfactory levels in support of the proposed development.

With the proposed mixed industrial development (warehouse and manufacturing) it will introduces the need for tractor trailer to access the site and the TIS requires a further refinement defining vehicle types and how they will impact intersections highlighted above. The County's view of the intersections is that they were not intended or geometric designed for the operation of tractor trailer in large volumes and improvements will be required to support this development.

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.

Sincerely



Pasquale Costanzo C.E.T.
Technical Services Supervisor