



**PUSLINCH**  
1850

**December 12, 2025 – 4412 Watson Rd S**

Authority/Consultant	Drawing/Document	Comment
<b>Conservation Authority – Grand River Conservation Authority</b>	<ul style="list-style-type: none"> <li>Draft Site Plan of Part of Lot 23, Concession 9, Township of Puslinch, prepared by BSR&amp;D Ontario Land Surveyors (BSR&amp;D, 2021)</li> <li>Tree Rehabilitation Plan, prepared by Aboud &amp; Associates Inc. (Aboud, 2021)</li> <li>Figure 1 – Locality Plan, Industrial Development, 4412 Watson Road South, Township of Puslinch, Ontario, prepared by JPL Services Inc. (JLP) (2022)</li> </ul>	See Attached.
<b>Wellington Source Water Protection</b>		Since this property is located in a vulnerable area (wellhead protection area, issues contributing area, intake protection zone etc.), but the activities as indicated, would not create a significant drinking water threat, the application can be screened out and it does not require a Section 59 notice under the Clean Water Act. Please note that we may provide comments on any future applications subject to this property, given the vulnerable areas.
<b>GEI Consultants</b> Andrea Reed		See Attached.
<b>Hydrogeology – Wellington Hydrogeology</b> Angie Mason	<ul style="list-style-type: none"> <li>OPS Form 180-2, dated November 15, 2021</li> </ul>	See Attached.
<b>Trace Associates Inc – Thomas Kolodziej</b>	<ul style="list-style-type: none"> <li>Site Alteration Permit Owner Authorization (Puslinch, 2025)</li> </ul>	See Attached.
<b>Township of Puslinch – Andrew Hartholt, Chief Building Official</b>	<ul style="list-style-type: none"> <li>Large Scale Site Alteration Permit – Site Alteration &amp; Fill Management Plan, prepared by JPL</li> <li>Large Scale Site Alteration Permit – Site Alteration &amp; Adverse Effects, prepared by JPL</li> <li>Large Scale Site Alteration Permit – Qualified Person Confirmation, prepared by JPL</li> </ul>	Building department works has no concerns or comments at this time.
<b>Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities</b>		Public works has no concerns or comments at this time.



TOWNSHIP OF  
**PUSLINCH**  
1827

**December 12, 2025 – 4412 Watson Rd S**

	<ul style="list-style-type: none"><li>• Large Scale Site Alteration Permit – Quality Control/Quality Assurance, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Laboratory Analysis of Fill Sample, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Documentation of Beneficial Purpose, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Evaluation of Fill Sample Results, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Approved Haul Road Permit, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Need for Proposed Volume of Fill, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Schedule of Timing of Site Alteration Activities, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Qualified Person Responsibility, prepared by JPL</li></ul>	
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December 11, 2025

Via email

Site Alteration Application

Olive Zhang

7404 Wellington Road 34

Township of Puslinch, ON N0B 2J0

Dear Olive Zhang,

**Re:** Site Alteration Application  
4412 Watson Road South  
Manohar Singh & Manjit Khaira

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted application to recognize the importation of up to 1,000 cubic metres of asphalt grindings to support the construction and widening of a driveway.

### **Recommendation**

GRCA staff are recommending that the application is deferred until the following additional studies are submitted:

- An environmental impact study.
- An environmental restoration plan.

### **Documents Reviewed by Staff**

Staff have reviewed the following documents submitted with this application:

- Topographic Map, prepared by BSR&D (dated May 13, 2021).
- Comment Summary, prepared by the Township of Puslinch (August 23, 2023).
- Draft Grading Plan, prepared by KLAB (dated May 15, 2021)
- Documentation of Beneficial Purpose, prepared by Ajay Jayalath (dated November 24, 2025).
- Evaluation of Fill Sample Results, prepared by Ajay Jayalath (dated November 24, 2025).
- Need for Proposed Volume of Fill, prepared by Ajay Jayalath (dated November 24, 2025).
- Schedule and Timing of Site Alteration Activities, prepared by Ajay Jayalath (dated November 24, 2025).
- Quality Control/Quality Assurance, prepared by Ajay Jayalath (dated November 24, 2025).
- Qualified Person Confirmation, prepared by Ajay Jayalath (dated November 24, 2025).
- Site Alteration and Adverse Effects, prepared by Ajay Jayalath (dated November 24, 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.

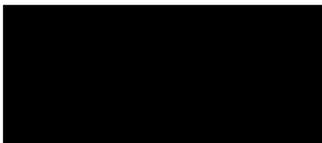
According to the information available at this office the subject property contains several wetlands and their regulated allowances. Therefore, a portion of the property are regulated by the GRCA under Ontario Regulation 31/24 Prohibited Activities, Exemptions, and Permits. Any proposed development activity and site alteration in the GRCA regulated area will require prior approval in the form of a permit from the GRCA.

As per the documents submitted by the applicant, an environmental impact study and environmental restoration plan are to be completed. The GRCA recommends deferral of the site alteration permit until these items have been completed and accepted.

Consistent with the GRCA's 2023-2025 approved fee schedule, this application is considered a minor site plan application and the applicant will be invoiced in the amount of \$465 for the GRCA's review of this application. A separate fee will be required for the GRCA Permit application

Should you have any questions, please contact Brandon Henderson at 519-621-2763 ext. 2327 or [bhenderson@grandriver.ca](mailto:bhenderson@grandriver.ca)

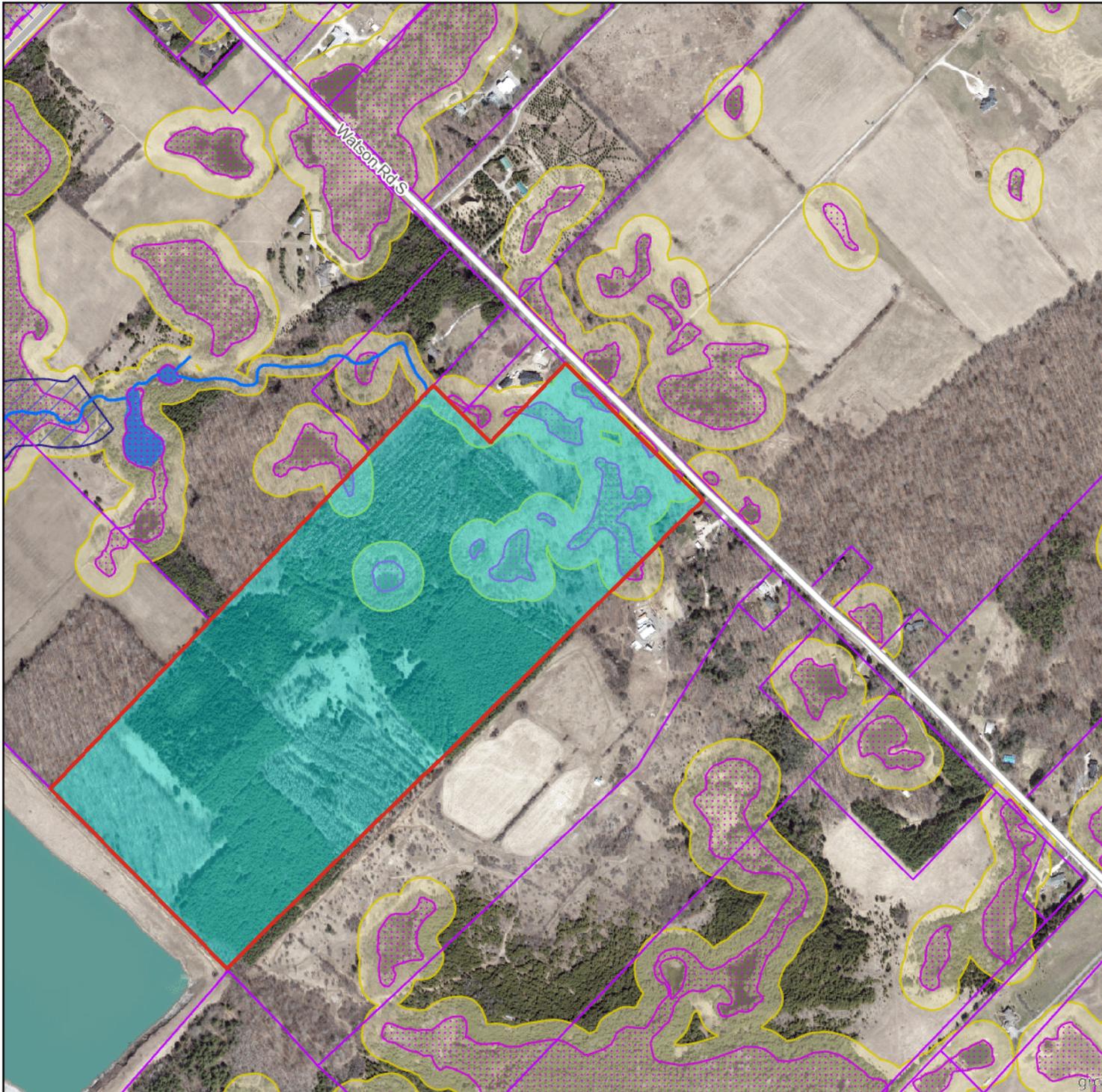
Sincerely,



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

Enclosed: GRCA Mapping

Copy: Manohar Singh & Manjit Khaira (owner's), Ajay Jayalath (agent)\*



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)

Copyright Grand River Conservation Authority, 2025.

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.



December 10, 2025  
GEI Project No. 2402578 – 121006-023

VIA CLOUDPERMIT: Township of Puslinch

Olive Zhang  
Township of Puslinch  
7404 Wellington Road 34  
Puslinch, ON N0B 2J0

**Re: SAP Application  
4412 Watson Road South  
Puslinch, ON**

Dear Ms. Zhang:

GEI Consultants Canada Ltd. (GEI) have reviewed a submission for site alteration permit for works at 4412 Watson Road South in the Township of Puslinch. The application was received on November 26, 2025.

It is our understanding that asphalt grindings were imported from a known source to the site to stabilize/widen the driveway around 2021. This work was completed without a site alteration permit in place. As the result of an order to rectify and remediate the site, approximately 800 m<sup>3</sup> of asphalt grindings were removed from the site in August 2024 and disposed of at Lockhart Pit. This work was done under a 2024 Site Alteration Agreement.

GEI completed an inspection at the site on December 17, 2024, and confirmed that it appeared 800 m<sup>3</sup>± of asphalt grindings had been removed from the driveway (approximately 1 m from each side, and the reduction of two turning areas). At that time, the slopes and banks on each side of the driveway needed to be graded and stabilized, and tree/wetland rehabilitation and planting was required. We understand that this new site alteration permit application will address these outstanding items.

## **1. Documents Received**

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

- Site Plan, prepared by BSR&D, dated May 13, 2021.
- Draft Grading Plan, dated May 15, 2021.
- Locality Plan, prepared by JLP, dated October 25, 2022.
- Laboratory Analysis Letter, prepared by JLP, dated November 24, 2025.

- Documentation of Beneficial Purpose Letter, prepared by JLP, dated November 24, 2025.
- Evaluation of Fill Results Letter, prepared by JLP, dated November 24, 2025.
- Haul Route Letter, prepared by JLP, dated November 24, 2025.
- Justification Letter, prepared by JLP, dated November 24, 2025.
- Project Schedule, prepared by JLP, dated November 24, 2025.
- QA/QC Letter, prepared by JLP, dated November 24, 2025.
- QP Confirmation Letter, prepared by JLP, dated November 24, 2025.
- QP Responsibility Letter, prepared by JLP, dated November 24, 2025.
- Fill Management Plan Letter, prepared by JLP, dated November 24, 2025.

The following documents were previously received and reviewed:

- Remedial Asphalt Removal Memorandum Letter, prepared by JLP, dated December 13, 2024.
- Proposed Remediation Plan, prepared by JLP, no date.
- Tree Rehabilitation Plan, prepared by Aboud and Associates Inc., dated October 5, 2021.

## **2. Additional Documents Required**

The Grading Plan provided as part of this submission is dated 2021 and was prepared before approximately 800 m<sup>3</sup> of asphalt grindings were removed in 2024. An updated Grading Plan should be provided to reflect current site conditions and proposed slope and bank rehabilitation and stabilization.

The JLP letters reference that Aboud and Associates are working on an Environmental Impact Study (EIS), which has not been provided to date. We assume that the EIS will provide recommendations for a Remediation Plan for the property, which will include grading and stabilization of the banks and slopes, re-instatement of wetlands, and tree remediation and planting. Please provide the EIS and Remediation Plan when available.

## **3. Technical Comments**

We have no new comments from an engineering perspective on the documents submitted to date. Once updated Grading and Remediation Plans are submitted, we will provide comments with regard to the grading and stabilization of the driveway banks and slopes. The tree remediation and planting and wetland re-instatement plans will be reviewed by others.

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

WHL Project: 2501.12

December 10, 2025

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

**Attention:** Monika Farncombe  
Development and Legislative Coordinator

**RE:** Hydrogeological Comments for Large Site Alteration Application  
4412 Watson Road South, Puslinch, Ontario

Wellington Hydrogeology Ltd. (WHL) is pleased to provide hydrogeological comments on the above-noted submission for 4412 Watson Road South, Puslinch, Ontario (the site).

Based on the applicant's submission, we understand that:

- The applicant had previously imported approximately 1,800 m<sup>3</sup> of asphalt grindings to the site around 2021 without a Site Alteration Permit for the purposes of driveway widening and stabilizing.
- Due to the Township's moratorium to restrict site alteration projects to no more than 1,000 m<sup>3</sup>, approximately 800 m<sup>3</sup> of asphalt grindings were removed and disposed of under a 2024 Site Alteration Agreement.
- The current Site Alteration Permit application is intended to address outstanding requirements, including grading and stabilization following the 2024 removal of asphalt grindings, as well as tree and wetland rehabilitation and associated planting measures.

Hydrogeological comments were provided by Harden Environmental Services Ltd. as part of the 2024 Site Alteration Agreement process, which have been considered in the preparation of this review letter.

## Hydrogeological Technical Comments

### 1. **Regulatory Status of Asphalt Grindings**

Asphalt grindings are classified as recycled aggregates and are therefore exempt from Ontario Regulation 406/19 governing Excess Soil Management.

### 2. **Review of Submitted Assessments**

Wellington Hydrogeology Ltd. (WHL) generally concurs with the evaluations and supporting documentation prepared by JLP Services Inc. (References: JLP 2025a–e, h, i, k).

### 3. **Environmental Impact Study**

JLP (2025f) indicates that an Environmental Impact Study (EIS) was to be submitted to the Township prior to December 5, 2025. However, the EIS was not included in the materials provided for review.

### 4. **Project Schedule Considerations**

The tentative schedule outlined by JLP (2025f) includes wetland restoration (if required) and final grading activities between May and December 2025. WHL notes that this timeline may require adjustment due to the current review date and prevailing weather conditions (current snow cover conditions).

### 5. **Environmental Protection Measures**

JLP (2025g, j) confirms that wetlands will be reinstated and that recommendations from the Tree Preservation Plan should be implemented to reduce potential environmental impacts. WHL agrees and further advises evaluating culvert placement to maintain hydrological flow along the driveway consistent with pre-development conditions. The Tree Rehabilitation Plan (Aboud & Associates Inc., 2021) identifies a culvert along Watson Road South but does not indicate additional culverts along the driveway near wetlands. It is noted that the EIS may include an evaluation of hydrological flow conditions on the site; however, as noted in Comment 3, this document was not available for review.

## Action Required

WHL requests that the proponent provide responses to Comments 3 to 5 prior to proceeding.

## Documents Reviewed

WHL reviewed the following documents in preparation of these hydrogeological comments:

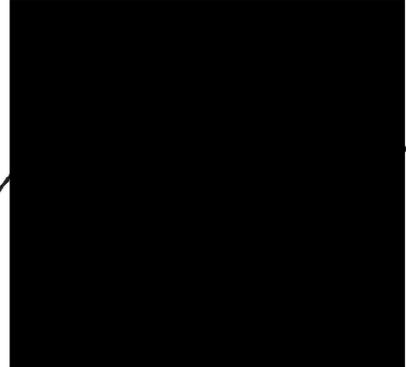
1. BSR&D. 2021. Draft Site Plan of Part of Lot 23, Concession 9, (Geographic Township of Puslinch) Now in The Township of Puslinch, County of Wellington. Reference No. 21-14-376-00-topo, dated March 13, 2021.
2. Aboud & Associates Inc. 2021. Tree Rehabilitation Plan, 4412 Watson Road, Township of Puslinch. Project: AA21-191A, dated October 5, 2021.
3. JLP Services Inc. 2025a. Re: G4416-21-5, Large Scale Site Alteration Permit – Laboratory Analysis of Fill Sample, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
4. JLP Services Inc. 2025b. Re: G4416-21-5, Large Scale Site Alteration Permit – Documentation of Beneficial Purpose, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
5. JLP Services Inc. 2025c. Re: G4416-21-5, Large Scale Site Alteration Permit – Evaluation of Fill Sample Results, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
6. JLP Services Inc. 2025d. Re: G4416-21-5, Large Scale Site Alteration Permit – Approved Haul Route Permit, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
7. JLP Services Inc. 2025e. Re: G4416-21-5, Large Scale Site Alteration Permit – Need for Proposed Volume of Fill, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
8. JLP Services Inc. 2025f. Re: G4416-21-5, Large Scale Site Alteration Permit – Schedule and Timing of Site Alteration Activities, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
9. JLP Services Inc. 2025g. Re: G4416-21-5, Large Scale Site Alteration Permit – Quality Control/Quality Assurance, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
10. JLP Services Inc. 2025h. Re: G4416-21-5, Large Scale Site Alteration Permit – Qualified Person Confirmation, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.

11. JLP Services Inc. 2025i. Re: G4416-21-5, Large Scale Site Alteration Permit – Qualified Person Responsibility, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
12. JLP Services Inc. 2025j. Re: G4416-21-5, Large Scale Site Alteration Permit – Site Alteration & Adverse Effects, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
13. JLP Services Inc. 2025k. Re: G4416-21-5, Large Scale Site Alteration Permit – Site Alteration & Fill Management Plan, 4412 Watson Road South, Township of Puslinch, ON. Dated November 24, 2025.
14. Ontario Provincial Standard Specification 180, Site Selection Notification for Material Managed as Disposal Fill, dated November 15, 2021.

## Closure

We appreciate the opportunity to provide these comments. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

### WELLINGTON HYDROGEOLOGY LTD.



Angela Mason, M.Sc., P.Geo., QP<sub>ESA</sub>  
Senior Hydrogeologist and CEO  
Cell: 519-831-9696  
Email: [amason@wellingtonhydrogeology.com](mailto:amason@wellingtonhydrogeology.com)

December 9, 2025  
Trace Project No. 900-0585-01

Submitted via email: o Zhang@puslinch.ca

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

Attention: Olive Zhang - Municipal Building Official

Dear Olive:

Re: Review of Site Alteration Permit Application  
4412 Watson Road South, Township of Puslinch, Ontario

## 1.0 INTRODUCTION

The Corporation of the Township of Puslinch (the Township) retained Trace Associates Inc. (Trace) to conduct a review of the information and data submitted in support of the Site Alteration Permit Application (the Application) for the property located at 4412 Watson Road South, Township of Puslinch, Ontario, hereinafter referred to as “the Site.” This document was prepared under Trace’s Professional Report Conditions (Appendix A).

The support documents provided by the Township that were reviewed by Trace included:

- Draft Site Plan of Part of Lot 23, Concession 9, Township of Puslinch, prepared by BSR&D Ontario Land Surveyors (BSR&D, 2021)
- Tree Rehabilitation Plan, prepared by Aboud & Associates Inc. (Aboud, 2021)
- Figure 1 – Locality Plan, Industrial Development, 4412 Watson Road South, Township of Puslinch, Ontario, prepared by JPL Services Inc. (JLP) (2022)
- OPS Form 180-2, dated November 15, 2021
- Site Alteration Permit Owner Authorization (Puslinch, 2025)
- Large Scale Site Alteration Permit – Site Alteration & Fill Management Plan, prepared by JPL (2025k)
- Large Scale Site Alteration Permit – Site Alteration & Adverse Effects, prepared by JPL (2025j)
- Large Scale Site Alteration Permit – Qualified Person Confirmation, prepared by JPL (2025f)
- Large Scale Site Alteration Permit – Quality Control/Quality Assurance, prepared by JPL (2025h)



- Large Scale Site Alteration Permit – Laboratory Analysis of Fill Sample, prepared by JPL (2025d)
- Large Scale Site Alteration Permit – Documentation of Beneficial Purpose, prepared by JPL (2025b)
- Large Scale Site Alteration Permit – Evaluation of Fill Sample Results, prepared by JPL (2025c)
- Large Scale Site Alteration Permit – Approved Haul Road Permit, prepared by JPL (2025a)
- Large Scale Site Alteration Permit – Need for Proposed Volume of Fill, prepared by JPL (2025e)
- Large Scale Site Alteration Permit – Schedule of Timing of Site Alteration Activities, prepared by JPL (2025i)
- Large Scale Site Alteration Permit – Qualified Person Responsibility, prepared by JPL (2025g)

## 1.1 Background

Based on the review of the information and data provided in support of the Application, Trace understands that the Site is a vacant property. Trace also understands that the previous site owner(s) cut down 617 trees on site to construct an access off Watson Road South (Aboud, 2021) and that some of the on-site wetlands were affected by the construction of the driveway (JPL, 2025j). The previous site owner(s) also reportedly imported an unknown quantity of asphalt grindings to the Site for the purpose of improving and widening the gravel driveway. The length of the section of driveway to be improved with the asphalt grindings has not been indicated. According to OPSF Form 180-2, the asphalt grindings were reportedly imported to the Site from the property located at 12 Nicholas Beaver Road, in Puslinch, Ontario (the Source Site) without the required site alteration permit (the Permit). It is noted that the Source Site is not a Ministry of Natural Resources (MNR)-licensed aggregate producer.

Following the issuance of the Cease and Desist Order by the Township, over 800 m<sup>3</sup> of excess asphalt grindings were reportedly removed from the Site. The unspecified quantity of asphalt grindings, deemed to be sufficient to complete the planned site alteration activities, remained on site pending receipt of the Permit (JPL, 2025b).

## 1.2 Objective

As instructed by the Township, the purpose of the review conducted by Trace was to determine the following:

- Does the Application include all the required information and data listed in *By-law Number 2023-057* (Puslinch, 2024) (the Site Alteration By-law)?
- Does the soil/fill imported to the Site meet the applicable soil use and/or property use quality standards?

## 2.0 TRACE ASSOCIATES INC. REVIEW COMMENTS

### 2.1 Does the Application include all the required information and data listed in By-law No. 2023-057?

Based on Trace's review of the documents provided in support of the Application, a number of the required information and/or data have not been included. Given the scope and the location of the proposed site alteration works, some of the missing information and/or data are not considered significant, i.e., they are



not needed to determine if the proposed site alteration activities have or are likely to cause adverse effects, as defined in the Site Alteration By-law. However, according to the provided information, some of the on-site wetlands were affected by the site alteration activities conducted by the previous site owner(s) (JPL, 2025j). The specific deficiencies are listed in the attached Schedule B Control Plans review checklist (Appendix B).

Based on the information provided by the Township, Trace understands that site alteration applications involving importation of fill directly from an MNR-licensed pit or quarry are exempt from submitting soil/fill quality data and the associated documents (e.g., sampling and analysis plan and quality assurance / quality control program). Since the Source Site is not an MNR-licensed aggregate producer, the Application is not exempt from the requirement to submit soil quality data and the associated documents; however, given the nature of the imported fill (asphalt grindings), the missing information is not considered significant.

## **2.2 Does the soil imported to the Site meet the applicable soil use and/or property use quality standards?**

The quality of fill (asphalt grindings) imported to the Site is not identified; however, given the nature of the imported fill (asphalt grindings), the excess soil quality standards listed in the document titled *Rules for Soil Management and Excess Soil Quality Standards* (MECP, 2024) are not applicable.

## **3.0 CONCLUSIONS**

Based on the review of the above-listed documents, Trace has concluded that the Application is missing some of the information and/or data required to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law. The missing information and/or data are listed in the attached Schedule B Control Plans review checklist (Appendix B).

## **4.0 RECOMMENDATIONS**

Based on the review of the above-listed documents, Trace recommends that the missing information identified in the attached Schedule B Control Plans review checklist (Appendix B) (as needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects) should be provided to the Township.

## **5.0 LIMITATIONS**

The scope of this document is limited to the matters expressly covered. The Township, and any other party using this document with the express written consent of the Township and Trace, also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace cannot be held responsible for environmental conditions at the Site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Township and may not be relied upon by any other person or entity without the express written consent of the Township and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.



## 6.0 CLOSURE AND QUALITY MANAGEMENT

We trust this meets your requirements. Should you have any questions or comments, please contact the undersigned.

Respectfully submitted,  
Trace Associates Inc.



09-Dec-2025

Prepared by:  
Thomas Kolodziej, B.A.Sc., P.Eng., QP  
Senior Project Manager / Technical Advisor  
519.741.5774  
tkolodziej@traceassociates.ca

Reviewed by:  
Pamela Cameron, B.A.Sc., P.Eng., QP  
Director, Ontario Region  
519.741.5774  
pcameron@traceassociates.ca

TK/sc

## APPENDICES

- Appendix A.....Trace Associates Inc. Professional Report Conditions
- Appendix B.....Schedule B Control Plans Review Checklist

## DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	P: Drive (Secretary)	December 9, 2025



## 7.0 REFERENCES

- Aboud (Aboud & Associates Inc.). (2021). *Tree rehabilitation plan, 4412 Watson Road South, Township of Puslinch.*
- BSR&D (BSR&D Ontario Land Surveyors). (2021). *Draft site plan of Part of Lot 23, Concession 9, Township of Puslinch.*
- JPL (JPL Services Inc.). (2022). *Figure 1 – Locality plan, industrial development, 4412 Watson Road South, Township of Puslinch, Ontario.*
- JPL (JPL Services Inc.). (2025a). *Large scale site alteration permit – Approved haul road permit, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025b). *Large scale site alteration permit – Documentation of beneficial purpose, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025c). *Large scale site alteration permit – Evaluation of fill sample results, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025d). *Large scale site alteration permit – Laboratory analysis of fill sample, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025e). *Large scale site alteration permit – Need for proposed volume of fill, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025f). *Large scale site alteration permit – Qualified person confirmation, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025g). *Large scale site alteration permit – Qualified person responsibility, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025h). *Large scale site alteration permit – Quality control/quality assurance, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025i). *Large scale site alteration permit – Schedule of timing of site alteration activities, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025j). *Large scale site alteration permit – Site alteration & adverse effects, 4412 Watson Road South, Township of Puslinch, ON.*
- JPL (JPL Services Inc.). (2025k). *Large scale site alteration permit – site alteration & fill management plan, 4412 Watson Road South, Township of Puslinch, ON.*
- MECP (Ministry of Environment, Conservation and Parks). (2024). *Rules for soil management and excess soil quality standards.* King's Printer. <https://www.ontario.ca/files/2024-06/mecp-rules-for-soil-june-2024-en-2024-06-17.pdf>
- Puslinch (The Corporation of the Township of Puslinch). (2024). *Site alteration by-law 2023-057.* <https://puslinch.ca/wp-content/uploads/2025/01/BL2023-057-Site-Alteration.pdf>
- Puslinch (The Corporation of the Township of Puslinch). (2025). *Site alteration permit owner authorization.*



## **Appendix A**

Trace Associates Inc.  
Professional Report  
Conditions

### 1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

### 2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

### 3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.



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## 4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.
2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

## 5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the "Scope") and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

## 6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

## 7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace's reasonably exercised discretion.

## 8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services



**PUSLINCH**  
1850

**December 12, 2025 – 4412 Watson Rd S**

Authority/Consultant	Drawing/Document	Comment
<b>Conservation Authority – Grand River Conservation Authority</b>	<ul style="list-style-type: none"> <li>Draft Site Plan of Part of Lot 23, Concession 9, Township of Puslinch, prepared by BSR&amp;D Ontario Land Surveyors (BSR&amp;D, 2021)</li> <li>Tree Rehabilitation Plan, prepared by Aboud &amp; Associates Inc. (Aboud, 2021)</li> <li>Figure 1 – Locality Plan, Industrial Development, 4412 Watson Road South, Township of Puslinch, Ontario, prepared by JPL Services Inc. (JLP) (2022)</li> </ul>	See Attached.
<b>Wellington Source Water Protection</b>		Since this property is located in a vulnerable area (wellhead protection area, issues contributing area, intake protection zone etc.), but the activities as indicated, would not create a significant drinking water threat, the application can be screened out and it does not require a Section 59 notice under the Clean Water Act. Please note that we may provide comments on any future applications subject to this property, given the vulnerable areas.
<b>GEI Consultants</b> Andrea Reed		See Attached.
<b>Hydrogeology – Wellington Hydrogeology</b> Angie Mason	<ul style="list-style-type: none"> <li>OPS Form 180-2, dated November 15, 2021</li> </ul>	See Attached.
<b>Trace Associates Inc – Thomas Kolodziej</b>	<ul style="list-style-type: none"> <li>Site Alteration Permit Owner Authorization (Puslinch, 2025)</li> </ul>	See Attached.
<b>Township of Puslinch – Andrew Hartholt, Chief Building Official</b>	<ul style="list-style-type: none"> <li>Large Scale Site Alteration Permit – Site Alteration &amp; Fill Management Plan, prepared by JPL</li> <li>Large Scale Site Alteration Permit – Site Alteration &amp; Adverse Effects, prepared by JPL</li> <li>Large Scale Site Alteration Permit – Qualified Person Confirmation, prepared by JPL</li> </ul>	Building department works has no concerns or comments at this time.
<b>Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities</b>		Public works has no concerns or comments at this time.



TOWNSHIP OF  
**PUSLINCH**  
EST. 1850

**December 12, 2025 – 4412 Watson Rd S**

	<ul style="list-style-type: none"><li>• Large Scale Site Alteration Permit – Quality Control/Quality Assurance, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Laboratory Analysis of Fill Sample, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Documentation of Beneficial Purpose, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Evaluation of Fill Sample Results, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Approved Haul Road Permit, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Need for Proposed Volume of Fill, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Schedule of Timing of Site Alteration Activities, prepared by JPL</li><li>• Large Scale Site Alteration Permit – Qualified Person Responsibility, prepared by JPL</li></ul>	
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("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

## **9.0 ALTERNATE REPORT FORMAT**

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

## **10.0 RECORDS RETENTION**

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

## **11.0 GOVERNING LAW**

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



## **Appendix B**

Schedule B Control Plans  
Review Checklist



## BY-LAW 2023-057 SCHEDULE “B” CONTROL PLANS

REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025	
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario	
Item	Included	Not included	Comments
1. A control plan(s) required to be submitted as part of any Application for a Permit pursuant to this By-law shall include, among other things, the following:			
a. a key map showing the location of the Site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. the Global Positioning System (GPS) coordinates of the centroid of the Site in terms of easting and northing;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.
c. the Site boundaries and number of hectares of the Site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.
d. the use of the Site and the location and use of the buildings and other structures adjacent to the Site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.
e. the location, dimensions and use of existing and proposed buildings and other structures existing or proposed to be erected on the Site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.
f. the location of lakes, streams, wetlands, channels, ditches, other watercourses, and other bodies of water on the Site and within thirty (30) metres beyond the Site boundary;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information needed to assess whether the previously completed or the still to be completed Site alteration activities have or are likely to cause adverse effects, as defined in the Site Alteration By-law.
g. the location of the predominant Soil types;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025		
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario		
Item	Included	Not included	Comments	
h. the location, size, species, and condition of all Trees as defined in this By-law, including their dripline, and the composite dripline of all other Vegetation;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.	
i. the location of driveways on the lands and all easements and rights-of-way over, under, across or through the Site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
j. the location and dimensions of any existing and proposed stormwater Drainage systems and natural Drainage patterns on the Site and within thirty (30) metres of the Site boundaries;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law (Puslinch, 2024).	
k. the location and dimensions of utilities, structures, roads, rights-of-way, easements, highways, and paving;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
l. the existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.	
m. the Proposed Grade(s) and Drainage system(s) to be used upon completion of the work, which is the subject of the Permit;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The drainage information is needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law.	
n. the location and dimensions of all proposed work which is the subject of the Application for a Permit;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
o. the location and dimensions of all proposed temporary Topsoil or Fill stockpiles;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable (N/A) - Imported material has already been placed on site.	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025		
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario		
Item	Included	Not included	Comments	
p. the location, dimensions, design details and specifications of all work which is the subject of the Application, including all Site Erosion and Dust Control measures or Retaining Walls necessary to meet the requirements of this By-law and the estimated cost of the same;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law	
q. a schedule of the anticipated starting and completion dates of all proposed work which is the subject of the Application for a Permit;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
r. a list of the type of equipment and machinery that will be used during the Site Alteration process, including the expected days and times of operation in accordance with this By-law;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information not included; however, given the scope and the location of the proposed site alteration, the missing information is not considered significant.	
s. provisions for the maintenance of construction Site Erosion and Dust Control measures during construction and after, as required;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law	
t. typical notes on the final rehabilitation plan to indicate the final ground cover materials, type and size of Vegetation to be planted, depth of Topsoil, Tree removals or Tree protection measures;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information needed to assess whether the previously completed or yet-to-be completed site alteration activities have caused or are likely to cause adverse effects, as defined in the Site Alteration By-law	
u. proposed Site access location(s) and haul route(s) to and within the Site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
v. a description of the quality and source of the proposed Fill with confirmation that the Fill meets the applicable Excess Soil Quality Standards (ESQS) (MECP, 2024) for the Site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The quality of fill (asphalt grindings) imported to the Site is not identified; however, given the nature of the imported fill (asphalt grindings), the ESQS are not applicable.	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025		
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario		
Item	Included	Not included	Comments	
i. if Site-specific standards for Soil quality acceptance have been developed using the MECP's (Ministry of the Environment, Conservation and Parks) Excess Soil Beneficial Reuse Assessment Tool (BRAT) ( <a href="https://www.ontario.ca/page/handling-excess-soil">https://www.ontario.ca/page/handling-excess-soil</a> ), a copy of the BRAT model input and output and a signed statement by the Qualified Person preparing the BRAT model;	<input type="checkbox"/>	<input type="checkbox"/>	N/A	
ii. If Site-specific standards for Soil quality acceptance have been developed using a risk assessment pursuant to the requirements in the Rules for Soil Management and Excess Soil Quality Standards (MECP, 2024), a copy of the risk assessment and a signed statement by the Qualified Person who prepared the risk assessment model must be submitted;	<input type="checkbox"/>	<input type="checkbox"/>	N/A	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025		
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario		
Item	Included	Not included	Comments	
w. a Sampling and Analysis Plan (SAP) for the source of the proposed Fill;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	According to the Site Alteration By-law, site alteration applications involving the importation of fill directly from a Ministry of Natural Resources (MNR)-licensed pit or quarry are exempt from submitting soil quality data and the associated documents (e.g., sampling and analysis plan and quality assurance / quality control program). The source of the imported fill, identified as 12 Nicholas Beaver Road, in Puslinch, Ontario, is not an MNR-licensed pit or quarry, and as such, this application is not exempt from submitting soil quality data and the associated document. However, given the nature of the imported fill (asphalt grindings), the missing information is not considered significant.	
x. a Quality Assurance/Quality Control (QA/QC) Program;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Please refer to comments under Item w	
y. the scale of drawings, either 1:500 or 1:1000;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
z. operational procedures manual;	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
aa. for Site to receive greater than 10,000 m <sup>3</sup> , and where required by the provisions of Ontario Regulation 406/19 (GO, 2019), as amended, file a notice on the Excess Soil Registry operated by RPRA (Ontario Resource Productivity and Recovery Authority); and	<input type="checkbox"/>	<input type="checkbox"/>	N/A – Imported material has already been placed on site.	



REVIEW CHECKLIST FOR CONTROL PLAN DATED:		December 9, 2025		
SITE ADDRESS:		4412 Watson Road S., Township of Puslinch, Ontario		
Item	Included	Not included	Comments	
bb. all other information as deemed necessary or required by the Designated Official.	<input type="checkbox"/>	<input type="checkbox"/>	N/A	

**General Notes:**

1. Where a permit from the County of Wellington or the Township is required to use any portion of the proposed haul route, the issuance of, and conformity with such permit(s) shall be deemed to be a condition of the issuance of the Permit under this By-law.
2. It shall be the responsibility of the Owner to ensure that all Fill which is Placed or Dumped under this By-law shall conform with, and meet, the requirements of this By-law and all conditions of the Permit. At any time during the term of the Permit, an Inspector or the Designated Official may require evidence of such conformity, including, without limiting the generality of the foregoing, a requirement that the Permit Holder provide evidence to the satisfaction of the Designated Official that each Truckload complies with the requirements of this By-law.
3. Every control plan accompanying an Application for a Permit under this By-law must be stamped by a Qualified Person approved by the Designated Official.
4. Notwithstanding any other provisions of this By-law, the Designated Official may waive the requirement for a Control Plan or any part thereof, after taking into consideration the proposed works and the anticipated impact on the Site and the surrounding environment.

**REFERENCES**

GO (Government of Ontario). (2019). *Ontario Regulation 406/19: On-site and excess soil management, made under the Environmental Protection Act, last amendment 550/24*. <https://www.ontario.ca/laws/regulation/r19406>

MECP (Ministry of Environment, Conservation and Parks). (2024). *Rules for soil management and excess soil quality standards*. King's Printer. <https://www.ontario.ca/files/2024-06/mecp-rules-for-soil-june-2024-en-2024-06-17.pdf>

Puslinch (The Corporation of the Township of Puslinch). (2024). *Site alteration by-law 2023-057*. <https://puslinch.ca/wp-content/uploads/2025/01/BL2023-057-Site-Alteration.pdf>