

D14-ONT (Ertl) 2nd Submission Comment Summary

Consultant	Comments
Township Planner – Nethery	See attached letter
Township Hydrogeologist – Harden	See attached letter
Township Noise Consultant – Valcoustics	See attached letter
Township Engineer – GEI	See attached letter
Source Water	See attached letter
Township Ecologist – Dougan	See attached letter
Township Building Department	<p align="center">Comments unchanged from last circulation:</p> <p>For the purposes of the Building Department review, the temporary zoning application appears complete with the following conditions:</p> <ol style="list-style-type: none"> 1. Separate Building Permits are required for the office/truck repair building, the associated septic system, and any retaining walls greater than 1m in height that have been built without the benefit of a building permit. To date, a complete permit application has not been recieved. 2. Adequate on-site fire water storage with a dry-hydrant will be required as part of the building permit process. Ensure that detailed calculations are provided for sizing the reservoir tank(s). For the dry hydrant location, ensure the distance to the main entrance is no more than 45m. Please see the attached document for tank and hydrant specifications as a guide.
Township Soil Engineer – Trace & Associates	Pending



March 11, 2026

Frank Ertl
2374868 Ontario Inc.
6678 Wellington Road 34
Cambridge, ON N3C 2V4

Re: Zoning By-law Amendment, 2nd Submission
6676-6678 Wellington Road 34
Township File No.: D14-ONT - 6678 Wellington Rd 34
Our File No.: 124

Nethery Planning, on behalf of the Township of Puslinch, is providing comments in response to the second submission of the application above and are intended to assist in identifying areas where additional policy justification or technical clarification will be helpful as part of a future resubmission.

On January 14, 2026, the applicant submitted the document entitled "1st Submission Response Letter - 6678 Wellington Rd 34 - File No. D14-ONT" in response to the Planning Comments issued by Nethery Planning on November 3, 2025. The applicant's responses are summarized below, along with responses where applicable.

1. COMMENTS AND RESPONSES

Nethery Planning November 3, 2025	Comment #1: <i>What is the procedure if an emission or exceedance occurs during operations? Several documents reference different inspection frequencies as some refer to daily monitoring, while the Inspection Form and Design and Operations Report identify weekly inspections. Please clarify the actual monitoring schedule and describe the protocol if a non-compliance event occurs during operations, such as how the township and public will receive this information.</i>
GSP Group January 13, 2026	Response to Comment #1: Operational matters are within the responsibility of MECP and not a zoning consideration. These provisions are already in the ECA which is summarized as a courtesy as follows. As per the Waste ECA, the Owner is responsible to ensure that the Property is monitored in accordance with the Monitoring Plan that includes:

1. Sampling of the groundwater wells and the two-on-site water supply wells on a quarterly basis with samples to be analyzed for metals, VOCs, PHC F1-F4, SVOCs, and PAHs;

2. Sampling of the stormwater management pond on a weekly basis with samples to be analyzed for metals, VOCs, PHC F1-F4, SVOCs, and PAHs.

3. Measurement of the static groundwater levels at the eight groundwater monitoring wells quarterly during the groundwater sampling events.

The Owner is responsible for preparing and submitting a groundwater monitoring report, on an annual basis, within 90 days following the end of each operational season. In the event of exceedance observed with the Monitoring Program results, there is a Trigger Response Plan that outlines the following protocols:

- If there is an exceedance of MECP Table 2 Standards in any of the source strength or downgradient wells, then a second round of groundwater sampling for the parameter(s) for which the exceedance was observed will be conducted within 60 days to ensure that the sample is representative of aquifer conditions. Should a similar parameter exceedance be confirmed after the second round of sampling, the MECP District Office will be notified of the groundwater exceedance.
- Based on the historical groundwater data, as well as weekly surface water monitoring results and other Site information (e.g., soil sampling data and operational incidents) as applicable, a groundwater response assessment, inclusive of a risk screening evaluation if the exceedance is determined to be the result of Site operations, will be conducted for the parameter(s) of concern to determine potential response actions to be completed. Results of the risk screening evaluation and potential response actions (i.e., additional sampling of groundwater and surface water samples, treatment/remediation options, etc.) will be reported to the MECP District Office for review and input prior to finalizing and implementing appropriate actions.

	<p>As per the Waste ECA, the Owner is also required to prepare and provide a copy of an Emergency Response Plan to the Puslinch Fire Department (contained in the Design and Operations Report). The Plan is to be continuously updated and is always retained and implemented by staff in the event of an incident. It is the Owner's responsibility to take all measures to contain and clean up any spill (as defined in the EPA) which may result from the operation of the Site and immediately implement the Plan if required. Fuel and oil materials spills, upsets, and fires are to be reported to the MECP's Spill Action Centre or local Fire department. Under the Environmental Protection Act, in the event of a spill, the Director (MECP) may require the Owner to develop and implement plans to notify public authorities and members of the public who may be affected by a discharge (18(1)7.iii.A).</p> <p>As per the Air & Noise ECA, the Owner must ensure that the noise emissions from the facility comply with the limits set out in Ministry Publication NPC-300. Also, sound emissions from the equipment should not exceed the limits provided in the Acoustic Assessment Report. The Owner is required to prepare a manual outlining the operating procedures and a maintenance program for the equipment used in operations. They are also responsible for preparing a Best Management Practice Plan for the control of fugitive dust emissions and conduct and submit a report on an Acoustic Audit.</p> <p>Furthermore, the Owner is required to retain, for a minimum of two (2) years from the date of their creation, all records and information relating to or resulting from the recording activities required by the Noise ECA, and make those records available for review by the MECP. Annual reports also are required to be submitted to MECP documenting and reporting on the operations of the previous year.</p> <p>If a complaint is received, the Owner is required to notify the District Manager at the MECP and document the investigation and responses to the complaint.</p>
<p>Second Circulation Response to Comment #1:</p>	<p>The operational plan is noted and, if the application is to be approved, the Township would want such a plan and enhancements recognized going forward. Of clarification:</p>

	<ol style="list-style-type: none"> 1. What happens in the 60-day window where a potential exceedance is occurring? What options exist for downgradient wells that may be impacted by the occurrence? 2. What potential contaminants are not addressed in the list in Condition 25.2 of the Provincially-approved ECA (No. A-500-4277838045)? What consideration has been given to monitoring those potential contaminants? 3. What potential recourse exists if dust issues exist or are identified? <p>On zoning considerations and operational matters, I will note that the protection of ecological systems and the protection of public health and safety are matters that need to be considered by the council of a municipality when making a decision [<i>Planning Act</i>, sections 2(a) and 2(o)]. Development is not to create new hazards (2024 Provincial Planning Statement, Policy 5.1.1). Development and site alteration is also to be restricted in or near sensitive ground water features such that the feature and related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches (2024 Provincial Planning Statement, Policy 4.2.2). The Township is interested in ensuring all information is available to make the appropriate recommendation as part of this development application (change in land use) requiring a <i>Planning Act</i> approval.</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #2: <i>Per the Harden Environmental comments , dated November 3, 2025, how will the reporting required by the ECA be shared to the Township and the public at large?</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #2: As mentioned in response to Comment #1, any spills are reported to the MECP's Spill Action Centre or Puslinch Fire Department. Under the Environmental Protection Act, in the event of a spill, the Director (MECP) may require the Owner to develop and implement plans to notify public authorities and members of the public who may be affected by a discharge (18(1)7.iii.A).</p>
<p>Second Circulation</p>	<p>Response:</p>

<p>Response to Comment #2:</p>	<p>This comment can be closed. Should the application be approved, the Township will require a condition that the Township Fire Department <u>shall</u> be notified of spills or potential placement of contaminants.</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #3: <i>In the Design and Operations Report, Section 2.9 discusses stormwater management and introduces a “final pond” for liquid soil settling. This feature is not described or detailed in any other reports. The Township has previously requested design information for this pond. Please provide detailed engineering drawings and a written explanation of its design, function, and how it integrates with the broader stormwater system.</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #3: Please refer to GEI and Trace response letters for a description of the conceptual layout of the two (2) proposed liquid soil unloading/drainage swale/holding ponds and the extent of the liner system to be constructed beneath these features and the dry soil stockpile area. If the Township approves the temporary zoning, then the detailed design of these features will be prepared and as-built drawings certifying the construction will be provided as required by the Waste ECA.</p>
<p>Second Circulation Response to Comment #3:</p>	<p>Response: Reliance on a conceptual design shall not satisfy the Township that groundwater resources are protected, improved or restored.</p> <p>Condition 28.1.2 of the Provincially-approved ECA (No. A-500-4277838045) states that “as-built drawings showing construction details for the above-noted liners to the Director no later than 120 days from the date of issuance of this approval”. With that requirement, are there detailed design drawings ready for construction purposes available at this time?</p> <p>The Township needs to review these drawings as part of addressing concerns to groundwater resources, which would demonstrate that groundwater resources are maintained, restored or enhanced to demonstrate consistency with Policy 4.2.2 of the Provincial Planning Statement and conformity with Section 4.9.7 [and 4.9.7.2(a) in particular] of the County Official Plan. Per Comment #1 above, these are considerations that need to be addressed now as part of this</p>

	development application (change in land use requiring a <i>Planning Act</i> approval) and not at the site plan approval stage.
Nethery Planning November 3, 2025	Comment #4: <i>The Design and Operations report does not reference or integrate a current groundwater monitoring plan or any contingency measures (it is for references of the Provincial ECA). Please provide these details and how they address the site's hydrogeological sensitivity.</i>
GSP Group January 13, 2026	Response to Comment #4: The Waste ECA does specify a Monitoring Program which includes detailed groundwater and surface water monitoring requirements. These requirements were developed from the proposed monitoring programs provided in the Hydrogeological Impact Assessment prepared by GHD and provided to the Township, and these plans are referenced and summarized but not typically also included in a Design and Operation Reports. The Hydrogeological Investigation provides a comprehensive review of Site hydrogeological conditions. Please also see responses to Harden Environmental and Trace comments.
Second Circulation Response to Comment #4:	Response: Per comments from Harden Environmental, Conditions 21 and 23.3 of the Provincially-approved ECA (No. A-500-4277838045) do not address unknown hazardous wastes and unknown contents from each hydrovac operation. At the public information meeting, GHD (Fred Taylor) emphasized several times that only processed soil meeting Table 1 SCS will be used as backfill in the pit. Any soil not meeting Table 1 will be transported off-site to a Ministry-approved disposal facility. I see this in GHD's documentation and understand this is contained in Ministry correspondence. What mechanisms are proposed to ensure Table 2 soils do not cross over into Table 1 soil intended to be used for rehabilitation? (There is some integration of this point with Comment #12 and volumes required for rehabilitation.) Further, is the applicant confirming at this time that no other materials are proposed to be imported onto the site for rehabilitation purposes? In the response to Comment #12, I note the suggestion that, "If permission

	is not granted, then soil needs to be brought into the Property from another source.”
Nethery Planning November 3, 2025	Comment #5: <i>Please provide an assessment of the proposal against Policy 3.7.1 of the Provincial Planning Statement, with respect to waste management systems.</i>
GSP Group January 13, 2026	Response to Comment #5: The proposed temporary use is being planned in an appropriate area within the Township of Puslinch. The proposed use is being proposed on a portion of the Property that currently contains a licensed gravel pit and is adjacent to an existing aggregate operation to the west. The proposed use on the Site will benefit from its proximity to the licensed gravel pit on the Property and the soil and water handling operations are very similar to gravel pit type operations. The clean soil generated from the proposed use will be used directly towards the rehabilitation of the licensed gravel pit. The Site is well buffered from Wellington Road 34 and from adjacent neighbouring properties. The Site is strategically located on Wellington Road 34 which connects to major transportation corridors including Highway 6 and Highway 401, which are considered major highways. The Site’s proximity to these major highways will allow for the efficient movement of hydrovac trucks to and from the Site. The Site is adequately sized to accommodate a maintenance/repair shop, processing/stockpiling areas, parking areas and site services (stormwater management facility, well, leaching bed, fire cistern, etc.) all related to the proposed use as well as the existing gravel pit. The storage of liquid soil will be temporary as it is directly related to the rehabilitation efforts of the gravel pit. Based on these reasons above, it is our opinion that the proposed use is consistent with Policy 3.7.1 of the Provincial Planning Statement.
Second Circulation Response to Comment #5:	Response: The response emphasizes buffering, proximity to transportation corridors, and co-location with an existing licensed gravel pit—synergy of business operations. The Provincially-approved ECA (No. A-500-4277838045) has approved, among other things, “the receipt, unloading, loading and transfer of

	<p>waste and other waste-derived materials” (Condition 19.1), waste processing 24 hours per day, 7 days per week, unless otherwise restricted by municipal by-laws (Condition 19.2), and a range of “waste management activities (Condition 22). At no point does it recognize any aspect of the mineral aggregate operation.</p> <p>“Waste management system” in the 2024 Provincial Planning Statement is defined to include, “sites and facilities to accommodate waste from one or more municipalities and includes recycling facilities, transfer stations, <u>processing sites and disposal sites</u>” (emphasis added).</p> <p>The response speaks to operational synergy and site design, but less about this location on a site where groundwater interaction is known. This is an important consideration of Policy 3.7.1 of the 2024 Provincial Planning Statement.</p> <p>The opinion put forward is that the activity is incidental, ancillary, or accessory to the rehabilitation requirements associated with the mineral aggregate operation. Rehabilitation of the site per <i>Aggregate Resources Act</i> requirements is not tied to the hydrovac operation or soil dehydration. It could come from a myriad of sources. The use does not present as any form of ancillary or dependent on the mineral aggregate operation. Likewise, it is the Township’s understanding that the hydrovac operation is not permitted in the <i>Aggregate Resources Act</i> licence.</p> <p>Policy 11.4.4 of the County Official Plan states, “Active sanitary landfill sites are identified in this Official Plan. Recycling, waste reduction, waste transfer stations, and <u>similar waste management facilities</u> may be permitted in addition to waste disposal activities” (emphasis added). It goes on further to state, “the development of new sites will require an amendment to this Plan as well as appropriate provincial environmental approvals”. Waste management facilities is defined to include, “sites and facilities to accommodate solid waste from one or more municipalities and includes landfill sites, recycling facilities, <u>transfer stations, processing sites</u> and hazardous waste depots” (emphasis added).</p>
--	---

	<p>Here is where an ancillary connection can be made: elements of waste transfer and waste processing are included in the proposal, and are constituent components of a waste management system in the County Official Plan framework. That requires two approvals: a Provincial approval [represented by the Provincially-approved ECA (No. A-500-4277838045)] and an amendment to the County Official Plan. A resolution of support by County or Township Council (or both) may be required to meet Policy 11.4.4 of the County Official Plan and Section 4(2) of the <i>Environmental Protection Act</i>.</p> <p>I also note the letter from Dan Puddephatt, dated December 16, 2025, to Wellington Source Water Protection comments, in Comment #6, notes that, “that neither sodium nor chloride are identified issues for waste disposal significant drinking water threat policy categories”. The response to Comment #12 also suggests that, “If permission is not granted, then soil needs to be brought into the Property from another source.”</p> <p>Should the Township be considering the application outside of the permitted use framework for waste disposal, noting that we agree that the County Official Plan should be considered as a whole?</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #6: <i>Please provide a detailed explanation of conformity to Sections 4.9.7(a) and Part 5 of the County Official Plan.</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #6: Policy 4.9.7 of the County Official Plan discusses the Paris and Galt Moraines and their function to support hydrologic processes and features that influence groundwater and surface water resources. These processes and features include groundwater recharge; groundwater storage; surface water detention; groundwater potential; baseflow to streams; springs; and watershed divides for groundwater and surface water.</p> <p>Policy 4.9.7.1 of the County Official Plan contains policies that protect these processes and functions and promote stewardship activities.</p>

Policy 4.9.7.2 of the County Official Plan contains policies as it relates to lands identified in the Paris and Galt Moraines on Schedule C that lie outside of Wellhead Protection Area, that include:

- a) *Large scale development proposals including intensive recreation, mineral aggregate operations, new rural employment area designation, and urban boundary expansions will be required to demonstrate that ground and surface water functions will be maintained, and where possible, restored and enhanced;*
- b) *Small scale developments that do not rely on significant site alterations will not normally be required to demonstrate protection of the moraines. Where planning approvals for small scale developments are needed, best practices for alteration will be required to reduce or eliminate cut and fill activities that would fill in land surface depressions.*
- c) *Agriculture is a major activity on the moraines and is an accepted and supported use of land. The County will encourage best practices for agriculture by developing and supporting stewardship programs.*

Whether the proposed use is considered large or small scale development, it is not anticipated to cause changes to any of the listed processes and features of the Paris and Galt moraines. The only two surface water features located on the Property have been constructed in accordance with and are maintained as required by the approved ARA license Rehabilitation Plan. The proposed use does not require a Permit to Take Water from the Ministry as usage is under 50,000 litres per day. Any groundwater used for the hydrovac operation is returned to the Site as well as supplemented by potable municipal water obtained off-site. There are no impacts on the groundwater resource.

Based on these reasons, it is our opinion that the proposed use conforms to Policy 4.9.7 of the Official Plan as there will be no change to processes or features related to the Paris and Galt Moraines.

Part 5 of the County Official Plan addresses the Greenland System. The Greenlands System includes features and areas that are apart of the natural heritage or areas that include wetlands, environmentally sensitive areas, streams and valley lands, ponds, lakes, woodlands, etc. The Property is designated “Secondary Agricultural” and “Greenlands” on Schedule B7 (Puslinch Land Use) in the County Official Plan.

	<p>Based on the findings of the Environmental Impact Assessment (the “EIA”) prepared by GHD, there is a woodlot identified on adjacent lands immediately east of the Property and Site. Based on the EIA, a 10-metre buffer is required from the adjacent eastern woodland. The EIA concluded that the proposed temporary use would have no negative impacts on the identified natural heritage provided that mitigation measures outlined in the EIA are implemented. All operations related to the proposed use are outside of the proposed 10-metre buffer zone.</p> <p>Policy 5.6.7 of the County Official Plan states the Core Greenlands and Greenlands mapping on schedules to the Official Plan may need to be refined by more detailed mapping on individual sites. When more detailed mapping is available, minor adjustments may be made without an amendment to the Plan. Given the results of the EIA, the Greenlands designation on Schedule B7 should be updated to reflect the findings of the EIA. There are no identified natural features on the Property. This is also reflective in the zoning for the Site.</p> <p>It is our opinion that the proposed use conforms to the policies of Part 5 of the County Official Plan as identified natural features adjacent to the Property and Site will be protected with no negative impact.</p>
<p>Second Circulation Response to Comment #6:</p>	<p>Response:</p> <p>On Section 4.9.7(a) or Part 5 of the County Official Plan, the concern is not about water taking—but protection of the groundwater resources. Relying on Harden Environmental, the conclusion that the proposed use will not negatively impact hydrologic functions associated with the Paris-Galt Moraine is not supported by a comprehensive hydrogeological assessment that addresses the site’s sensitivity within the moraine system. As noted in the technical review by Harden Environmental, the hydrogeological environment beneath the site may not naturally limit horizontal and vertical groundwater movement, raising concerns regarding potential water quality impacts. This is a known issue on the subject lands, and not a matter to be addressed at the site plan approval stage.</p> <p>In this context, it remains unclear how the proposal can be conclusively determined to protect the integrity and hydrologic function of the Moraine in accordance with Section 4.9.7(a), particularly given the nature of the proposed waste processing and the long-term handling of dewatered, solidified soils. This is also relevant from a locational</p>

	<p>analysis perspective to demonstrate consistency with Policy 3.7.1 of the 2024 Provincial Planning Statement.</p> <p>With respect to Part 5 of the County Official Plan (Greenlands System), the request here is two-fold: first, for the applicant to clarify that historic removal, and second, how the policies of Section 5.6.2 Natural Heritage System (second-half of that section) are met, including restoration or enhancement of the natural heritage system. The project represents significant development, and opportunities to link or connect natural features to demonstrate how the development will main, restore or, where possible, improve linkages and connectivity. Do those opportunities exist on the site?</p> <p>Additional analysis and clarification are therefore required to establish conformity with both Section 4.9.7(a) and Part 5 (in particular, Section 5.6.2) of the County Official Plan.</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #7: <i>Which use, under the Section 6.6.3(c) of the Council Official Plan cited as applying to permit the proposal, applies to cover the importation and processing of excess soil and liquid soil? Notwithstanding the existence of the Waste ECA, the importation of liquid soil into mineral aggregate operations has not been permitted since 2022 without a separate approval, calling into question the description of the liquid soil operation as “ancillary.”</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #7: Policy 6.6.4 of the County Plan states that in addition to the uses allowed by the underlying designation, the following uses may be allowed in Mineral Aggregate Areas through rezoning: c) ancillary such as asphalt plants, concrete plants, aggregate transfer stations, stockpiling and blending of aggregates with materials such as salt, sand-salt mixture and recycled road materials.</p> <p>In reviewing the policy above, ancillary is not a defined term in the County Official Plan. Ancillary is commonly defined as “providing support to the primary activities or operation”. In our opinion, the proposed use has a supporting role in the rehabilitation of the gravel pit. Clean soil generated from the operation is used directly to rehabilitate</p>

	<p>the Property back to its primary use. Furthermore, the term “such as” implies this is a list of suggested uses, not an exhaustive list.</p>
<p>Second Circulation Response to Comment #7:</p>	<p>Response: The supplied definition, which came up in the Google predictive results at the top of the search window on my look, is not how I what commonly characterize ‘ancillary’ for land use planning. In the absence of an Official Plan or Provincial plan/policy definition, I would instead rely on the Merriam-Webster online definition of “ancillary”: having a subordinate, subsidiary, or secondary nature OR serving as a supplement or addition.</p> <p>Ancillary uses are clearly subordinate, incidental, and directly related to the primary use in scale, function, and purpose. In this case, the proposed soil processing operation involves the active importation, treatment, and handling of materials originating off-site, which represents a distinct land use activity that can operate independently of aggregate extraction and is not inherently dependent on pit rehabilitation to function. The proposal is, in effect, introducing a new waste-related land use that extends beyond the extraction and rehabilitation function contemplated under Section 6.6.3(c) of the County Official Plan. Also I note from Comment #10 that Section 11.4 of the County Official Plan provides an overall framework for waste management, including considering applications for new waste management.</p> <p>The proposed use is not part of the <i>Aggregate Resources Act</i> licence, when rehabilitation could be occurring through a variety of clean soil sources. An additional Provincial permission, being the Provincially-approved ECA (No. A-500-4277838045), was required to permit the activity.</p> <p>In the response to Comment #12, I note the suggestion that, “If permission is not granted, then soil needs to be brought into the Property from another source.”</p> <p>Based on the information provided, the soil and liquid soil processing operation does not present as incidental or minor in relation to pit rehabilitation. It is the inverse of mineral aggregate resources, which are where they are and the extraction has to occur there. The</p>

	processing of liquid soil does not appear to have to be tied to this particular site or as an integral component of the application.
Nethery Planning November 3, 2025	Comment #8: <i>Section 6.6.3 of the County Official Plan is cited for applicability of the use permissions, and the Temporary Use policies (Section 13.4) apply to permit “the temporary use of land for a purpose that is not permitted by the Official Plan or Zoning By-law” (the first Section 2.3.6 of the submitted Planning Justification Report). Is it the applicant’s position that the temporary use policies supersede or modify the application of these other policies?</i>
GSP Group January 13, 2026	Response to Comment #8: The first paragraph of Section 2.3.6 (Temporary Use By-law) in the Planning Justification Report prepared by GSP Group, dated July 2025, references the policies outlined in Section 13.4 in the County Official Plan. It is our opinion that the temporary use does not require an Official Plan Amendment as it can be considered an ancillary use to the primary activity on the Property, which is aggregate extraction and rehabilitation. The intent of a temporary use by-law is to allow a use that is otherwise prohibited by the Official Plan or Zoning By-law.
Second Circulation Response to Comment #8:	Response: The application does not appear to meet the policy intent of Section 13.4. In addition to Comment #5, the likely duration of the use is at a minimum 10 years (and potentially more), questions of compatibility and impact assessment have not yet been satisfactorily addressed, and general conformity with the County Official Plan has not been demonstrated. This comment may be answered through the other comments.
Nethery Planning November 3, 2025	Comment #9: <i>Based on the technical comments provided to date, Section 6.6.7 of the County Official Plan has not been adequately addressed in the current submission. Updated technical reports and the inclusion of detailed design drawings may assist in clarifying this policy alignment, and we will provide further assessment at that time.</i>

<p>GSP Group January 13, 2026</p>	<p>Response to Comment #9: Acknowledged.</p>
<p>Second Circulation Response to Comment #9:</p>	<p>Response: The comment is acknowledged, and further technical analysis can be summarized shall be handled through those responses and elsewhere in this letter.</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #10: <i>Please provide an assessment of the proposal against Section 11.4.4 of the County Official Plan, with respect to waste management systems.</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #10: Section 11.4.4 of the County Official Plan deals with policies related to disposal of waste. This section states that recycling, waste reduction, waste transfer stations, and similar waste management facilities may be permitted in addition to waste disposal activities. No new waste, recycling or disposal facilities are being proposed. The hydrovac trucks that may contain impacted soils are sent directly to a permitted MECP treatment or disposal facility and only return to the Site after all the contents have been removed. In our opinion, the proposed temporary use is a permitted use under Section 11.4.4 of the County Official Plan.</p>
<p>Second Circulation Response to Comment #10:</p>	<p>Response: This comment can be closed and dealt with going forward under Comments #5 and #12.</p> <p>This analysis appears to run counter to the Provincially-approved ECA (No. A-500-4277838045). The ECA establishes a regulated waste management operation with defined waste receipt limits, storage thresholds, operational and design requirements, processing methods, monitoring requirements, and financial assurance obligations under the <i>Environmental Protection Act</i>.</p> <p>The characterization that, “No new waste, recycling or disposal facilities are being proposed” does not apply, as the use is not permitted in the Township’s zoning by-law. The use being proposed does not appear to be incidental to the mineral aggregate operation; rather, it is synergistic to the overall business.</p>

	Section 11.4.4 of the County Official Plan must be interpreted in the context of the actual regulatory approval in place. The existence of a valid ECA for a waste disposal site satisfies that half of the County Official Plan's permission requirements for waste management.
Nethery Planning November 3, 2025	Comment #11: <i>Please confirm whether the shared driveway access from Wellington Road 34 will continue to be shared with the adjacent property and provide documentation of any existing legal agreement governing access, use, and maintenance responsibilities.</i>
GSP Group January 13, 2026	Response to Comment #11: There is currently an agreement with the adjacent landowner (Capital Paving) to share driveway access from Wellington 34 from the Owner. This is based on a 21-year lease agreement.
Second Circulation Response to Comment #11:	Response: This comment is addressed, noting that Capital Paving or any future landowner will need to ensure the lease remains secured on a go-forward basis.
Nethery Planning November 3, 2025	Comment #12: <i>Please provide further explanation as to why this use is being proposed as temporary rather than permanent, particularly given the 10-year time frame proposed. If issues arise through monitoring, it would be the intent to provide that review on performance at the renewal stage (assuming one is requested)? What happens to a partially completed filling operation if the permission is not extended? Also, per Section 1.2 of the Planning Justification Report and the Preconsultation meeting of February 27, 2025, does this mean the site requires 100,000 tonnes of material to complete rehabilitation?</i>
GSP Group January 13, 2026	Response to Comment #12: We are currently requesting a temporary use by-law for a period of up to three (3) years. If an extension is pursued after three (3) years, a performance review could be provided subject to the Township's request. If permission is not granted, then soil needs to be brought into

	<p>the Property from another source. The current gravel pit license allows 50,000 tonnes of material to be extracted per year so that is the minimum amount of rehabilitation required per year if extraction is conducted. Once extraction and rehabilitation of the gravel pit is complete, then the use is no longer required.</p>
<p>Second Circulation Response to Comment #12:</p>	<p>Response: A Temporary Use By-law under the Planning Act is intended to permit uses that are limited in duration and where the long-term planning framework remains intact. In this case, the scale of material importation, the reliance on ongoing extraction and rehabilitation cycles, and the stated multi-year horizon for site completion suggest a use that is functionally tied to long-term site operations rather than a short-term interim activity.</p> <p>The response does not address the planning implications of creating a partially rehabilitated site filling operation should the temporary permission lapse or not be extended. It remains unclear how incomplete grading, stockpiled materials, or partially rehabilitated areas would be managed, and whether this could result in the creation of a hazardous situation or environmental risk.</p> <p>Separately, the Township continues to ask for an estimated amount of fill to bring to the site: is 100,000 tonnes of material to complete rehabilitation? By 50,000 tonnes per year of extraction, is the applicant suggesting that if the application is approved that extraction would cease at the proposed receiver site for the dried soil? If extraction continues, does the amount of rehabilitation and therefore fill requirements increase?</p> <p>The approved Rehabilitation Plan in the <i>Aggregate Resources Act</i> licence does not show a final grade that is the same as the Existing Conditions (which is what 1:1 export/import ratio would mean as suggested in the applicant’s reply). Usually importing inert fill for rehab is where there’s a deficiency needed to create the slopes for viable after use (for example, for agriculture use as is currently anticipated).</p> <p>At the core of these questions is trying to understand if 10 years is an accurate estimate for length of time to rehabilitate the site. Likewise, if both the volume of processing is not met or all imported liquid soil fails</p>

	<p>to meet the Table 1 standard, it appears that no rehabilitation would occur through the hydrovac operation. Rehabilitation could take longer than the forecasted 10 years, unless there is additional information to confirm or say otherwise.</p> <p>A key criterion in addressing consistency with Section 13.4 of the County Official Plan is the likely duration of the temporary use. Where rehabilitation is anticipated to extend well beyond the proposed three-year term, is it good planning to assume that by-law extensions will have to be required to ensure the required rehabilitation occurs?</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #13: <i>Section 2.3.2 of the Planning Justification Report identifies employment and infrastructure servicing benefits. Is this operation more appropriately located within an industrial designation, given the nature and scale of the use?</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #13: As noted under response to Comment #5, the proposed temporary use is being planned in an appropriate area within the Township of Puslinch. The proposed use is located on a property that currently contains a licensed gravel pit and is adjacent to an existing aggregate operation to the west. The proposed use will benefit from the licensed gravel pit on the Property as the clean soil generated from the proposed use will be used directly for rehabilitation purposes. The site operations are well buffered from Wellington Road 34 and from adjacent neighbouring properties. The Site is strategically located on Wellington Road 34 which connects to major transportation corridors including Highway 6 and Highway 401, which are considered major highways. The Site's proximity to these major highways will allow for the efficient movement of hydrovac trucks to and from the Site. The Site is adequately sized to accommodate a maintenance/repair shop, processing/stockpiling areas, parking areas and site services (stormwater management facility, well, leaching bed, firefighting water cistern, etc.) all related to the proposed temporary use. Once extraction and rehabilitation operations are completed it is expected that the building may remain for use as storage.</p>

<p>Second Circulation Response to Comment #13:</p>	<p>Response: While providing examples of operational synergy for this site with the mineral aggregate operation, consideration of the proposed operation being a form of industrial use may offer other locations where such a use is permitted and a different analysis of potential effects may better support the use. For example, the County Official Plan provides for “processing” in Rural Employment Areas, per Section 6.8.2. A policy provides for compatibility associated with “major facilities” in Section 6.8.3, with “major facilities” defined to include waste management systems.</p> <p>MNR policy is quite clear that liquid soil (as defined by Ontario Regulation 406/19) will not be authorized for importation at a pit or quarry under the <i>Aggregate Resources Act</i> (reference can be made to ERO Posting 019-4801). The Township needs to understand the process proposed to surrender the <i>Aggregate Resources Act</i> licence over the portion of the property subject to this application. If recommended for approval, the Township would impose a Holding provision on the use until such time as confirmation of that surrender is received.</p>
<p>Nethery Planning November 3, 2025</p>	<p>Comment #14: <i>It appears in the June 2023 zoning sketch supplied that on-site infrastructure associated with the use falls outside of the orange square where the rezoning is targeted. Is that on-site infrastructure inside or outside of the ARA licence #626648 area?</i></p>
<p>GSP Group January 13, 2026</p>	<p>Response to Comment #14: A conceptual plan prepared by GSP is attached to this response letter. All on-site infrastructure is contained within the Property boundaries and licensed gravel pit area. If temporary approval for the use is granted, then the ARA license will be amended to remove that area, which is to be used for hydrovac operations in accordance with this application.</p>
<p>Second Circulation Response to Comment #13:</p>	<p>Response: This comment can be closed. Should an approval be granted, the Township would require the geographic boundaries of the approvals and associated timing to be structure to ensure the various elements of the operation are addressed.</p>

--	--

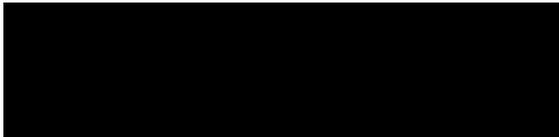
2. CONCLUSION

The Township reserves the ability to provide additional comments and request further clarification or documentation as part of subsequent submission reviews, should new information or revised materials warrant further evaluation.

Technical comments from the other review staff accompany this letter via the CloudPermit portal.

The Township welcomes a further resubmission to address the various comments.

Yours sincerely,



Joe Nethery, MCIP, RPP
Consultant Planner for the Township of Puslinch

Encl.



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

Groundwater Studies
Geochemistry
Phase I / II
Regional Flow Studies
Contaminant Investigations
OMB Hearings
Water Quality Sampling
Monitoring
Groundwater Protection
Studies
Groundwater Modeling
Groundwater Mapping
Permits to Take Water
Environmental Compliance
Approvals

Our File: 2135

March 5, 2026

Township of Puslinch
7404 Wellington Road 34
Guelph, ON, N1H 6H9
c/o Nethery Planning

Attention: Joe Nethery

Dear Joe;

Hydro-Vac Truck Disposal Area: 6678 County Road 34, Puslinch Township

We have reviewed the response from the applicant dated 16-December-2025 (GHD, 2025).

Comment 1

4.9.4 (b) of the Wellington County Official Plan obligates the Township to protect surface and groundwater quality and quantity through the use of regulatory and voluntary means of prohibiting, restricting or influencing land uses and activities within vulnerable areas, communal well policy areas, and underlying vulnerable aquifers;

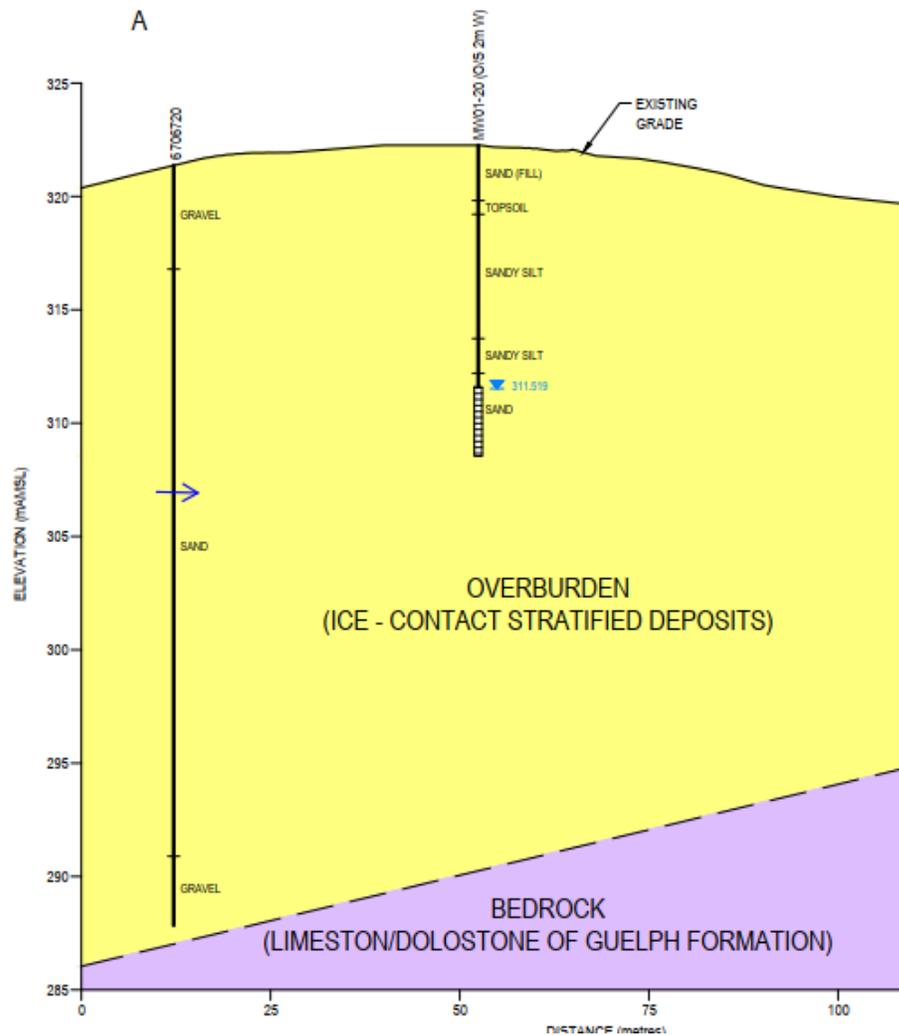
Through our role as an advisor to the Township, we are stating that the proposed use and operational design has not satisfied that all potential threats to groundwater quality have been addressed. Some of these examples are provided in the comments below.

Comment 2

The mitigation measures and ongoing assessments (monitoring plan) mentioned in the Hydrogeological Impact Assessment (HIA) cannot ensure that there are no negative impacts to the aquifer and receptors in the area. The underlying hydrogeological regime is a complex mixture of sand, sand and gravel and silt deposited in a haphazard manner during periods of glaciation and deglaciation. Groundwater

flow paths within that complex geological structure have in general been determined, but not accurately. Therefore, any groundwater monitoring program will be incapable of monitoring all possible groundwater flow pathways from the disposal area to the underlying aquifers, through the underlying aquifers and to neighbouring wells. This is the nature of a permeable hydrogeological environment, located in the source areas of groundwater flow paths that are shown to include both lateral and vertically downward components. For these reasons, from a hydrogeological perspective, the proposed waste disposal is risky. Were this activity located in an area of low hydraulic conductivity geological material such as silt and clay the groundwater flux from the site would be greatly retarded and chemical movement would be relatively slow.

Neither MW01-20 nor nearby private well 6706720 shown below from Figure 3.8, December 2020 supporting documentation prepared by GHD indicate protective layers above the bedrock aquifer or above the overburden aquifer.



The presence of chloride from on-site activities is a clear indication of the movement of chemicals from the ground surface to the underlying aquifer. It is our opinion that a slurry of water and soil that have not been tested for their chemical constituents should not be imported to this site and released. The potential for the release of known chemicals, including chemicals of concern that are not on the ECA list and future chemicals of concern should make this site ineligible for such releases.

The presence of polyaromatic hydrocarbons diethyl phthalate, fluoranthene, fluorene, 1+2-methylnaphthalenes, 1-methylnaphthalene, 2-methylnaphthalene, naphthalene, phenanthrene, phenol, pyrene detected in the monitoring wells is another indication that anthropogenic chemicals are being introduced to the groundwater system.

Comment 3

We acknowledge that because liquid management operations have been paused, there has been no construction of the liner system.

Condition 21 of the ECA does not address the trucking of unknown hazardous wastes and release of unknown hazardous wastes given that every truckload is not sampled.

Similarly, Condition 23.3 is difficult to comply with given the unknown contents from every hydro-vac operation.

The retention of the slurry water and conveyance of slurry water above constructed liners minimizes the immediate release of untested slurry waters to the underlying groundwater system. However, the required sample chemical list is not comprehensive allowing for the potential release of emerging chemicals of concern and unknown chemicals.

Comment 4

The Paris and Galt Moraine policies were implemented to recognize their importance to groundwater resources in Wellington County. The Policy objectives are:

The Paris and Galt Moraine policies are intended to:

- protect moraine processes and features in order to maintain and where possible restore and enhance groundwater and surface water resources
- promote stewardship activities on the moraines that maintain, restore or enhance groundwater and surface water resources.

It remains our opinion that the proposed activity is a water quality threat to groundwater resources and should not be permitted.

Comment 5

The imposition of liners, complex testing procedures and ongoing groundwater assessments speaks to the risk involved with this site. In addition, the complexity of the underlying geological sediment deposition history and groundwater that will preferentially follow tortuous pathways through those sediments introduces unacceptable risk.

Comment 6

See response to Comment 2.

Comment 7

The effective porosity in sand and sand and gravel can range from 0.13 to 0.44 (Freeze and Cherry, 1979) and the hydraulic conductivity of sand and gravel can be much higher than 5.8×10^{-4} cm/s. Again, Freeze and Cherry, 1979 has a range of hydraulic conductivity for sand and gravel between 10^{-3} and 10^2 cm. If the flow path contains aquifer materials with one order of magnitude greater hydraulic conductivity and a porosity of 0.15, the average rate of flow would be 0.67 m/day or 243 m/year. We are thus of the opinion that the average flow rate presented as 12 m/year cannot be applied across the site.

Comment 8 See response to Comment 7.

Comment 9

Our point is that the ultimate destination of the soil and groundwater is an area where most of the unsaturated geological materials have been removed as part of an aggregate resource extractive activity. The release of the water and placement of the soil is thus in an area even less protective of the underlying aquifer.

Comment 11

The proposed waste disposal activity is better suited from a hydrogeological perspective in a geological environment and hydrogeological regime that naturally limits the movement of groundwater both horizontally and vertically. The hydrogeological environment beneath this site in the source area of groundwater flow paths, where there is a complex geological deposition history that includes relatively permeable sediments makes this site unsuitable for the proposed activity.

Comment 12

Our point is that a document titled Design and Operations report should refer to or include the required monitoring program.

Sincerely,

Harden Environmental Services Ltd.



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



References:

Freeze, R. A., & Cherry, J. A. (1979). Groundwater. Prentice-Hall, Englewood Cliffs, NJ, 604 p.

GHD, 16 December 2025, Response to Review of Temporary Use By-Law Amendment Application Hydrogeology Comments – 6678 Wellington Road 34, Puslinch, Ontario

January 30, 2026

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

Attention: Monika Farncombe
mfarncombe@puslinch.ca

VIA E-MAIL

**Re: Peer Review of Acoustic Assessment Report
 Waste Processing Facility
 Puslinch, Ontario
 VCL File: 122-0269**

Dear Ms. Farncombe:

We have completed our review of a letter dated January 9, 2026 responding to our peer review comments dated August 12, 2025. This letter contains an attachment containing a copy of the Environmental Compliance Approval (ECA) that has been issued for the facility.

Our comments regarding the responses are outlined herein.

1.0 COMMENTS

The letter provided attempts to provides response to questions raised regarding the noise study prepared in support of the application. Many of the comments are an attempt to obtain clarification regarding the analysis and the assumptions that went into completing the study. An electronic copy of the noise model has not been provided for our review. The responses to many if the questions are not clear and do not provide the desired input. Thus, many of the comments raised previous remain outstanding.

The format below shows the original Valcoustics comment. Text in **red** has been added in response to the information provided by GHD in their response letter.

- a) Section 2 of the updated Acoustic Assessment Report (AAR) includes a table showing the on site vehicle activities. We have these questions and comments regarding this table:
 - a. What speed are the vehicles assumed to be operating at? **GHD states that operating speeds of 25 km/hr for trucks and 20 km/hr for the frontend load have conservatively been used in the model even though the posted speed limit on site is 5 km/hr. It is not clear how using a higher than posted speed is conservative. Since the number of trips per hour is limited according to the noise study (and by the ECA) using a higher speed results in the trucks and frontend loader operating**

for a shorter duration which reduces the off-site sound levels. The modelling should be done using the 5 km/h (or lower to be conservative) speed limit.

- b. Are the trips per hour one-way to two-way trips? In other words, does a trip include the vehicle travelling to and from its destination across the site? **Response addresses the comment.**
 - c. The heavy vehicle truck route accounts for a maximum number of 6 trips per hour during the daytime period. However, the updated traffic assessment indicates up to 20 trucks per hour would leave the site during the am peak hour. Thus, the assessment seems to not reflect the predictable worst-case scenario that the Ministry of Environment, Conservation and Parks (MECP) requires. **The response is not clear. Has an updated AAR been prepared? The May 28, 2025 traffic assessment continues to use 20 trucks per hour during the am peak hour. Further clarification is needed.**
- b) Table 2 also indicates that the frontend loader has now been modelled as a line source instead of a point source.
 - a. Why has the way this source been modelled differently in the updated report? **Response addresses the comment.**
 - b. With the assumed 15 trips per hour, how long is the frontend loader actually operating for during the predictable worst-case hour? **Response states that it is assumed that the frontend loader can operate for up to 60 minutes of an hour. However, the request was how long was the loader actually operating in the modelling based on 15 trips per hour at 20 km/hr?**
 - c) The first sentence of the last paragraph of Section 2 of the AAR does not make sense such that it is not clear what is intended. Clarification is needed. **Response addresses the comment.**
 - d) Section 3 of the AAR states that POR3 is an outdoor point of reception since it was evaluated to receive higher sound levels than the building façade. However, the results presented in Table 5.2 for POR3 are for the nearest façade of the two-storey dwelling. The table should also include the predicted worst case sound level at the grade level outdoor areas for POR3. **The response states that the sound level limits can be changed to outdoor sound level limits. This does not address the concern that sound levels presented in Table 5.2 are worst case.**
 - e) The figure numbers are not shown on my copy of the AAR. The first figure after the conclusions shows the noise source locations that were modelled. Comparison with the previous version of the model indicates that noise sources S2A and S2B (screening equipment and motor) have been moved from the eastern boundary of the site to a more central location.
 - a. Why were these two sources moved? **Response is that they were moved to better represent where the sources are actually located. It is still not clear if this is the worst-case operating location and what measures are in place to prevent them from moving to a different operating location.**

- b. The new locations are further from the receptors to the east of the site (i.e., POR1 to POR4) which could result in lower sound levels at these receptors. Do the updated model locations represent the predictable worst case operating location? **Response is that the screening equipment is not moved to other locations. What measures are in place to prevent them from moving to a different operating location?**
- c. How was the predictable worst case modelling location determined for each receptor? **The response provided relates to the receptor location. The comment requests how the worst-case operating locations were determined for each receptor and not where the receptor location is.**
- f) According to MECP Publication NPC-103, the procedures in SAE J88a should be used to establish the sound emission level from powered mobile equipment. Review of the sound data provided for the frontend loader (Caterpillar 973D) in Appendix E, the SAE J88 sound level is 85 dBA at a reference distance of 15 m. This translates to a sound power level of 116.5 dBA which is higher than the 113.2 dBA used in the assessment. **The response says that sound level change isn't significantly higher and the sound level has been accepted by the MECP. The 3.3 dBA sound level difference is considered significant and should be shown to still result in compliance with the MECP noise guideline limits. It is noted that the ECA does not state the equipment reference sound levels have been accepted. The ECA states that maximum equipment sound levels cannot exceed those in Table 1 of the noise study (Note 5.1.c) and that an acoustic audit will be required (Note 7). The SAE J88a sound level for the Caterpillar 973D is above the limit in Table 1 and cannot be used at the site.**

2.0 CONCLUSIONS

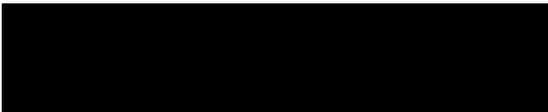
After our review of the response letter, many of the concerns remain outstanding. These need to be appropriately addressed before we can concur with the findings and conclusions of the noise study.

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

Yours truly,

VALCOUSTICS CANADA LTD.

Per:


John Emeljanow, P.Eng.

JEV
2026-01-30 Peer Review V4.0..docx

February 2, 2026
GEI Project No. 2402574 – 120006-017

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

Monika Farncombe
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON NOB 2J0

Re: ZBA 2nd Submission
6676-6678 Wellington Road 34
Puslinch, ON

Dear Ms. Farncombe:

Following our review of second submission documents for Zoning By-Law Amendment application received on January 14, 2026, we are providing comments in support of existing uses on the subject lands located at 6676-6678 Wellington Road 34 in the Township of Puslinch.

It is our understanding that the application is a Temporary Use By-Law Amendment for a portion of the site to permit management of liquid waste. A Zoning By-Law Amendment application was previously submitted for this property and was denied by the Township. A Temporary Use By-Law would permit a land-use that is otherwise prohibited by the Zoning By-Law on the subject lands for a duration of three years.

Pre-submission comments for the temporary zoning by-law amendment were provided on February 13, 2025, and a pre-consultation meeting was held on February 27, 2025. Comments on the first Zoning By-Law Amendment application were provided on November 3, 2025.

1. Documents Received

The application is incomplete as all required plans or studies have not been received. Additional documents required are listed in Section 2.

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

- Comment Response Matrix.
- Response to GEI Consultants Canada Ltd, prepared by GHD, dated December 17, 2025.

- Development Concept, prepared by GSP Group, dated June 6, 2023.

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

- Response to Environmental Comments, prepared by GHD, dated December 16, 2025.
- Response to Hydrogeology Comments, prepared by GHD, dated December 16, 2025.
- Response to Wellington Source Water Protection, prepared by GHD, dated December 16, 2025.
- Response to Valcoustics (Noise), prepared by GHD, dated January 9, 2026.
- Response to Ecology Technical Comments, prepared by GHD, dated January 12, 2026.
- 1st Submission Response Letter (Planning), prepared by GSP group, dated January 13, 2026.

2. Additional Documents Required

Further discussion is required with the overall review team to determine if it is acceptable to defer preparation of the following to site plan approval (as requested by the applicant’s engineer):

- Updated Stormwater Management Report
- Updated Design and Operations Report
- Civil engineering design drawings, including a Site Servicing and Grading Plan, and details for proposed stormwater/liquids soils management upgrades.

3. Technical Comments

Based on our previous comments and 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.	Stormwater Management Report and associated Engineering Drawings	Stormwater Management Report	<p><u>GEI Comment (August 18, 2025)</u></p> <p>The 2021 Stormwater Management Report provided with this submission (dated February 9, 2021) is not consistent with the information provided in the Site Servicing Study (dated June 20, 2025), and does not discuss proposed upgrades, including the proposed temporary pond, and a low permeability liner system beneath the liquid soil unloading/processing area, the temporary pond, the drainage swale, and the final pond.</p> <p>The 2021 Stormwater Management Report concludes that no new works or modifications to the site are proposed, but this is not currently correct. As such an updated Stormwater Management Report, with associated Site Servicing and</p>

No.	Matter	Document	Comment
			<p>Grading Plan and any necessary engineering details for the liner system and temporary pond, should be provided.</p> <p>Please ensure that the Stormwater Management Report addresses both quantity and quality considerations related to both liquid soils runoff and stormwater runoff.</p> <p><u>GHD Response (December 17, 2025)</u> The Stormwater Management Report will be updated to including engineering details of the proposed liner system and stormwater features once the zoning application is approved and we proceed to Site Plan Approval. The operations are currently paused pending zoning approval and the new water handling system and liner system have to be installed before the commencement of operations in accordance with the Waste ECA requirements.</p> <p>The conceptual extent of the liner system and the conceptual new water handling features are shown on Figure 1. Two liquid soil placement areas, 2 drainage swale and 2 holding ponds will be installed so that operations can continue pending the receipt of sampling results from one of the ponds as described in the Waste ECA and Design and Operations (D&O) Report. Then that pond will be emptied and water in the second pond will be tested.</p> <p><u>GEI Comment (February 2, 2026)</u> Request for deferral to site plan approval of updated SWM report and engineering details of proposed liner system and stormwater features to be discussed further with whole review team. The conceptual sketch and brief description of new water handling facilities above are acknowledged.</p>
2.	Design and Operations Report	Design and Operation Report	<p><u>GEI Comment (November 3, 2025)</u> The 2024 Design and Operations Report includes a 2022 Stormwater Management Report in Appendix D. Similar to Comment 1 above, the Stormwater Management Report should be updated to reflect the current proposed stormwater management/liquid soils management system, and the updated version should be included in the Design and Operations Report.</p> <p>In addition, the Design and Operations Report should be updated to address the conditions and requirements of the Waste ECA.</p> <p><u>GHD Response (December 17, 2025)</u> See Response to Comment 1. The D&O Report is required to be updated by the Waste ECA as Site and operational conditions change and will be updated as needed to reflect such changes. GHD notes that it is not typical for D&O Reports to copy and include each ECA condition and</p>

No.	Matter	Document	Comment
			requirement so that duplication and inconsistencies do not occur. <u>GEI Comment (February 2, 2026)</u> Acknowledged. Timing of updated SWM report submittal to be discussed further. If the D&O report is not the correct document for conditions and requirements of the Waste ECA to be addressed, please provide a separate letter addressing these for Township review.

3.2. Completed/Approved Matters

The following comments have been addressed.

No.	Matter	Document	Comment

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

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
Project Engineer



Parth Lad, E.I.T.
Technical Specialist



01/30/2026

Memorandum

To: Monika Farncombe - Planning and Corporate Services Coordinator

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

From: Keira Martinson - Source Protection Coordinator, Wellington Source Water Protection

Reviewed By: Kyle Davis - Risk Management Official, Township of Puslinch

**RE: 6678 Wellington Road 34, Township of Puslinch
Zoning By-Law Amendment - Submission 2**

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

Clean Water Act Section 59 Notice & Risk Management Plan:

GHD Limited - 11210029-LTR-16-Ertl-Wellington Source Water Protection dated December 16, 2025

1. Response from GHD is noted. Section 59 Notices are required for all applications. The Notice to deem the Site Plan Application complete was provided to the Township's Planning Department on August 19, 2025. Additional Notices are required for all future *Planning Act* and Building Permit applications.
2. Response from GHD is noted. A Risk Management Plan for winter maintenance activities and chemical handling and storage (DNAPL's) will be required for this property. This will be drafted by our office, sent to the owner for review and is required to be issued along with the Section 59 Notice for building permit issuance.

Land Use Planning:

GHD Limited - 11210029-LTR-16-Ertl-Wellington Source Water Protection dated December 16, 2025

3. WSWP acknowledges that a Flow Meter will be installed onto APW1 and that the data will be available upon request for review by the Township and the Risk Management Office. However, AGW1 is also a pumping well and our comment was in reference to both APW1 and AGW1. WSWP requests that a Flow Meter be installed on both APW1 and AGW1.
4. It is noted that there are no unused wells at the site.
5. WSWP acknowledges the submission of the Waste ECA and the Air & Noise ECA, and that a PTTW is not required.
6. Response from GHD is noted.



The Chemical Handling/Storage and Spills Response Plan as noted in the Design and Operations Report, dated March 26, 2024 will be fully reviewed during the site plan process and comments will be provided at that time.

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

Sincerely,



Jan 30, 2026

Keira Martinson
Source Protection Coordinator
519-846-9691 ext 283
kmartinson@centrewellington.ca



Jan 30, 2026

Kyle Davis
Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca



3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

February 23, 2026

Township of Puslinch
7404 Wellington Rd. 34, Puslinch, ON
N0B 2J0
Attn. Monika Farncombe, Planning and Corporate Services Coordinator

**RE: Ecology Technical Comments - File # D14-ONT, Roll Number -
23010000212500000 - 6676-6678 Wellington Rd. 34 -2nd Submission**

Dear Monika,

Thank you for inviting Dougan Ecology to provide technical comments on the second submission application for a Zoning By-law Amendment (ZBA) concerning the lands municipally known as 6676-6678 Wellington Rd. 34. The application is for a temporary use by-law to rezone the subject lands for 3 years to permit the temporary use of a liquid soil management operation on a portion of the property.

As part of this application, Dougan has reviewed the following documents:

- GHD's EIA addendum "response letter" titled "*Response to Review of Temporary Use Zoning By-Law Amendment Application Ecology Technical Comments - 6678 Wellington Rd. 34, Puslinch, Ontario*" (January 12, 2026)

As requested, our response to the second submission is outlined below:

1. **Application Support** - are there any technical concerns arising from your review of the reports submitted with the application?

Reply: There are outstanding comments required to be addressed prior to approval of the application.

The following table provides a summary of our previous comments, and any outstanding actions required following the review of the latest memo:



Previous Dougan Comment	Addressed? (yes/no)	Additional Comments
The Wellington County Official Plan (OP) - Schedule A7 Puslinch - designates the Subject Lands as "Greenlands". Section 5.6.1 of the OP, Permitted Uses, does not allow Commercial Uses in the Greenlands designation and under Section 5.6.4, Zoning, it suggests Greenlands be given a restrictive zoning by a municipal council. Please demonstrate how the proposed Zoning Amendment is compatible with the portions of the site designated as Core Greenlands.	No	See comment 1, below
Greenland System features identified in the EIA include: environmentally sensitive areas and significant woodlands. Floodplain and wetlands are also present on abutting lands owned by the County. Please review and demonstrate compliance with all of the applicable policies in Part 5 of the County Official Plan (i.e. 5.4.1, 5.4.3, 5.5.4, 5.5.5).	Yes	n/a
End use Restoration/Enhancement Plan capturing proposed woodland edge enhancements noted in the addendum and additional strategies, as applicable.	Yes	Restoration/Enhancement plan should be included as a condition of Site Plan Approval
Performance Monitoring Plan for silt/exclusion fencing to ensure mitigations (silt/exclusion fencing, barriers) are functioning as intended and repaired where required.	Yes	Performance Monitoring plan should be included as a condition of Site Plan Approval

1. Greenlands / Woodland Feature Boundary Refinement - Insufficient Response

The proponent’s response does not adequately address the basis for relying on a refined Greenlands/woodland boundary where mapped Greenlands extend into the proposed operational area but the feature no longer exists on the landscape.

While refinement of natural heritage feature boundaries based on field verification can be appropriate, the current submission relies solely on present-day conditions and does not address the causal and approval context of the feature removal that created the discrepancy between mapping and existing conditions. In the absence of this information, the justification for accepting the refined boundary remains incomplete. To support the proposed boundary refinement for the purposes of the Temporary Zoning By-law application, the EIS must demonstrate that the feature removal was lawfully authorized and that any associated rehabilitation obligations have been, or will be, addressed. At a minimum, the Addendum shall include:

- Approval / Authorization Context
Confirmation of whether the woodland removal occurred pursuant to an



approved Aggregate Resources Act license and associated Operational and Rehabilitation Plans, including identification of the applicable license(s) and a summary of any rehabilitation requirements applicable to the area of feature removal.

- Implementation Responsibility
Clarification of the party responsible for implementing any outstanding rehabilitation requirements associated with the approved plans, including whether such obligations run with the land or approval and remain applicable to the current owner/operator.
- Rehabilitation Commitment
Where rehabilitation of the original feature location is no longer proposed or feasible, a clear commitment to a restoration or compensation plan that replaces the lost ecological function elsewhere on the subject lands (e.g., canopy/woodland restoration within or adjacent to the ESA/Greenlands system), to be secured through the appropriate approval mechanism.

Any restoration or compensation proposed to address the historic feature removal shall be in addition to, and not in substitution for, previously identified mitigation, enhancement, or buffering measures associated with the current proposal.

Until the above information is provided, the peer review team cannot conclude that the proposed Greenlands/woodland boundary refinement is adequately supported for the purposes of the Temporary Zoning By-law application, nor that the application appropriately addresses the natural heritage implications of the historic feature removal.

We trust these comments assist the Township in developing the next steps regarding this application.

Sincerely,



Summer Graham, B.Sc. Eco. Mgmt. Tech. ISA
Ecologist - Restoration



Todd Fell, OALA, CSLA, CERP
Principal, Manager of Landscape
Architecture

