



PLANNING JUSTIFICATION REPORT

PREPARED FOR:

**Zoning By-law Amendment &
Consent – Lot Line Adjustment
Emerald Lake Resort Inc. c/o**

Drago Hasnas

7248 Gore Road

Township of Puslinch

File no. 25231A

May 2026



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1.0 Introduction

MacNaughton Britton Clarkson Planning Limited (MHBC) has been retained by Drago Hasnas (the “Owner”) to provide planning justification in support of an application for a Zoning By-law Amendment to recognize the existing number of camp/trailer sites and other facilities within the Emerald Lake Resort & Waterpark (with a municipal address of 7248 Gore Road) and to facilitate a consent application for a lot addition to the existing residential lot located immediately to the east (with a municipal address of 7260 Gore Road).

Emerald Lake Resort & Waterpark (“Emerald Lake” or the “subject lands”) is an existing recreational commercial campground and trailer park located on lands municipally addressed as 7248 Gore Road in the Township of Puslinch, while 7260 Gore Road (“7260 Gore”) is located immediately to the east of the subject lands and is developed with a single detached dwelling. The location of the subject lands and 7260 Gore is illustrated in **Figure 1**.

The subject lands and 7260 Gore are approximately 36 hectares and 0.35 hectares in size respectively, and are located on the north side of Gore Road between Concession Road 7 and Sideroad 25 South, approximately 3 kilometers southwest of Morriston. In this area of the Township, Gore Road functions as the municipal boundary between the Township of Puslinch and the City Hamilton. The subject lands contain a recreational campground and waterpark which is bisected by a Canadian Pacific Kansas City (CPKC) rail line. The waterpark and associated recreational facilities – including volleyball courts and natural areas – are located north of the railway, with the recreational campground and related ancillary buildings situated south of the rail line.

Emerald Lake contains 272 sites accommodating recreational vehicles (RVs), cabins, and tent camping. There are no expansions or additions proposed to the existing campground as part of the application. The purpose of the application is to recognize the existing development and bring it into compliance with the Zoning By-law. Separately, a consent application for lot line adjustment is proposed to add a small portion of the campground to 7260 Gore Rd to create a more regular shaped lot consistent with the applicable regulations of the Zoning By-law.

This Planning Justification Report is prepared for submission to the Township of Puslinch and includes the following:

- An introduction and general description of the subject lands, surrounding uses and existing conditions to provide an understanding of the locational context;
- A description of the proposed Zoning By-law Amendment;
- A review and summary of the technical reports prepared in support of the proposed application; and
- A review and assessment of the existing Provincial, and municipal policy and regulatory frameworks in relation to the existing development and proposed future lot addition.

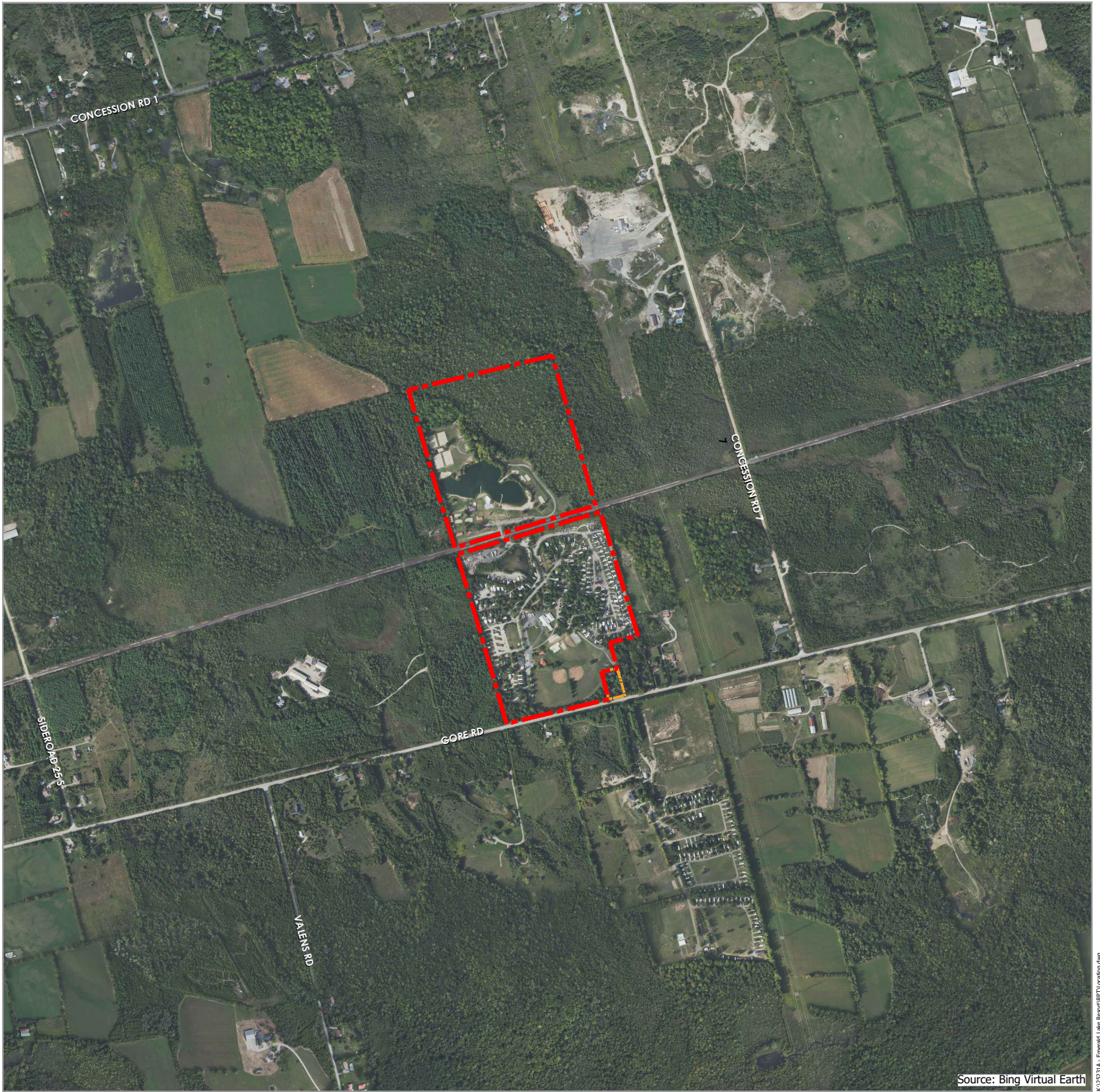


Figure 1 - Location Map

-  Subject Lands
-  7260 Gore



1.1 Pre-Consultation

A pre-consultation meeting was held on August 21, 2024 with the Owner and Township of Puslinch and County of Wellington staff, wherein the nature of the application was discussed. Subsequent discussions were held to scope the application and supporting studies, including a Terms of Reference for the preparation of an Environmental Impact Statement. In response to the pre-consultation record and subsequent discussions, the following plans and reports were prepared in support of a complete Zoning By-law Amendment application:

1. Schematic Site Plan, prepared by MHBC Planning;
2. Planning Justification Report, prepared by MHBC Planning;
3. Environmental Noise and Vibration Letter, prepared by SLR;
4. Servicing Report, Site Grading and Servicing Plan, prepared by Clearford Waterworks;
5. Scoped Environmental Impact Study, prepared by Natural Resource Solutions Inc (NRSI); and
6. Nitrate Impact Assessment, prepared by Clearford Waterworks.

A draft Zoning By-law Amendment is included as part of the Planning Justification Report. The proposed Amendment is enclosed as **Appendix B**.

2.0 Subject Lands and Surrounding Area

The subject lands are municipally addressed as 7248 Gore Road, in the Township of Puslinch within Wellington County and are legally described as Part of South Half Lot 29, Gore Concession, Township of Puslinch. The subject lands are located on the north side of Gore Road, with an approximate area of 36 hectares and frontage of approximately 374 metres. The subject lands are bisected in an east-west direction by the Canadian Pacific Kansas City (CPKC) Galt Subdivision rail corridor. The subject lands are a recreational commercial campground and waterpark that accommodates a variety of activities and events on a seasonal basis between May and October annually (see **Figure 2**). Further details regarding the seasonal operation of Emerald Lake are provided in Section 3.0 herein.

The lands include a natural lake (Emerald Lake) north of the railway with a woodland and provincially significant wetland located to the north and east of the lake associated with the Fletcher Creek Swamp Forest significant natural heritage feature complex, which is comprised of a Provincially Significant Wetland (PSW), woodlands, and Area of Natural Scientific Interest (ANSI). The existing woodland/wetland area and a small pond south of the rail line are regulated by the Hamilton Conservation Authority (HCA). **Figure 3** illustrates the existing natural features on the subject lands and HCA regulation limits.

The surrounding area is characterized primarily by natural areas and residential and agricultural uses in a rural setting as illustrated in **Figure 4** herein and described as follows:

NORTH: lands to the immediate north are characterized by a large woodland associated with the Fletcher Creek PSW/ANSI and agricultural lands. A former gravel pit now utilized primarily for outdoor storage and equipment maintenance is located to the northeast.

EAST: large rural residential lots fronting Gore Road abut the subject lands to the east, including 7260 Gore . A dog training and boarding facility (Shield K9 Dog Training) is located immediately to the east. Further to the east is a hydro corridor, small agricultural lands, natural features and rural residential lots.

SOUTH: Gore Road is the municipal boundary in this area between the Township of Puslinch and City of Hamilton. The Maple Grove RV Resort (a recreational commercial campground) is located south of Gore Road in the City of Hamilton. Other lands to the south are generally characterized by agricultural uses purposes.

WEST: lands to the west include woodlands and the Ontario Steam Heritage Museum.



Source: Bing Virtual Earth

Figure 2 - Subject Lands and 7260 Gore

-  Subject Lands
-  7260 Gore



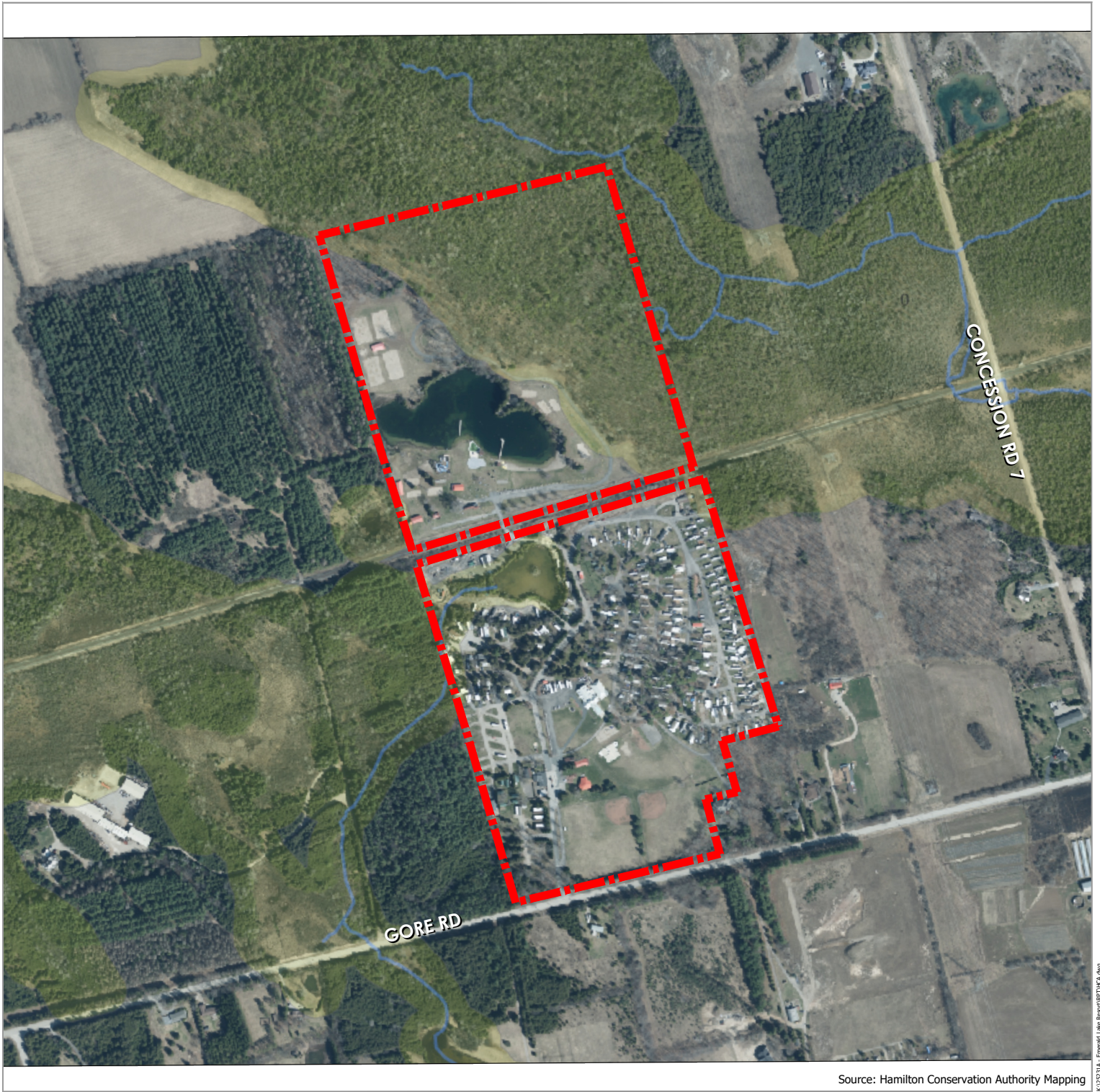
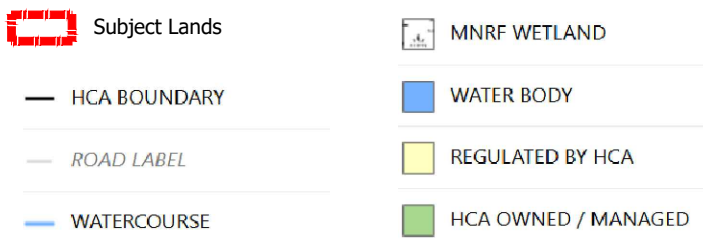
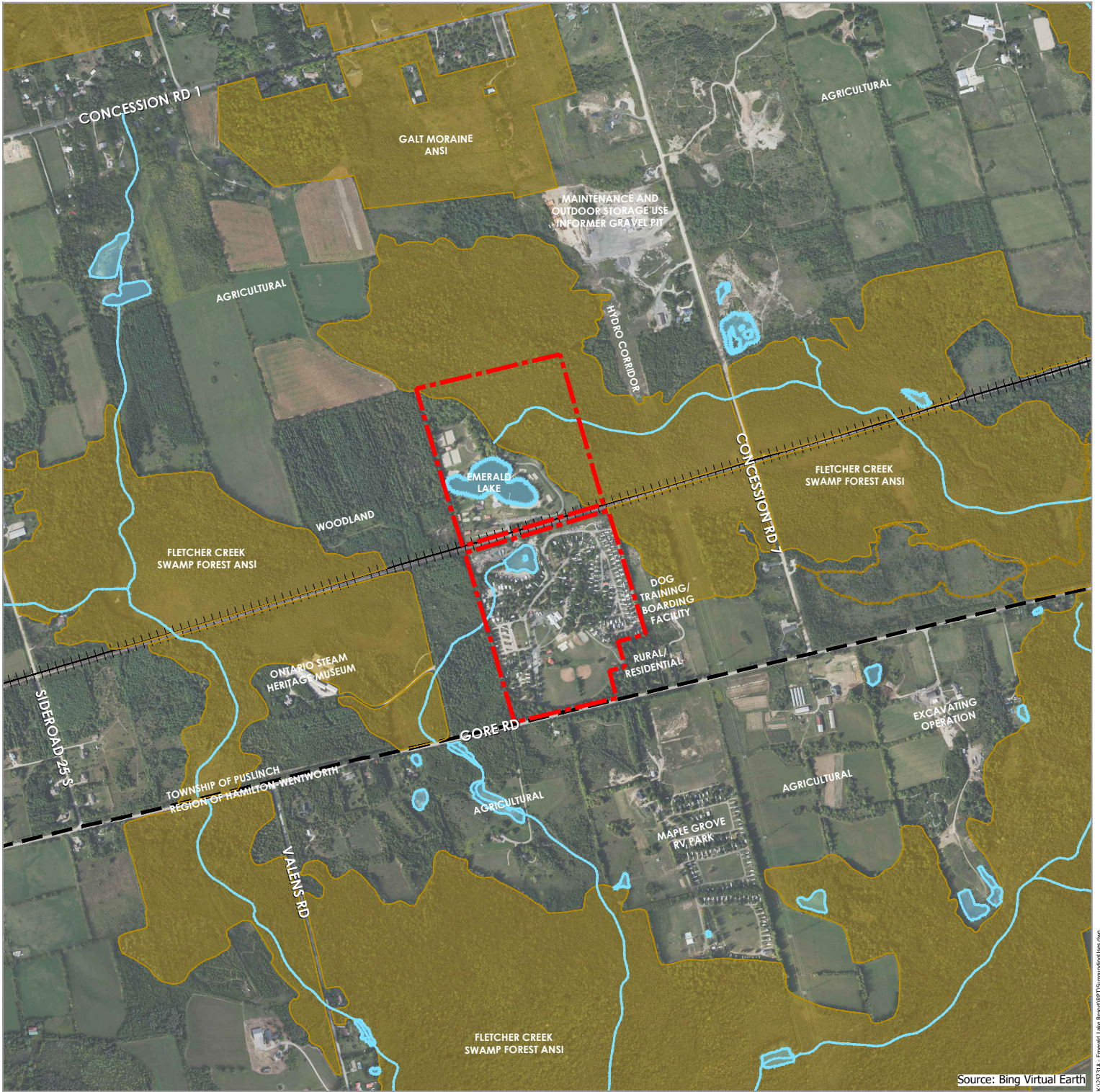


Figure 3 - Hamilton Conservation Authority Mapping





Source: Bing Virtual Earth

Figure 4 - Surrounding Uses

- Subject Lands
- Bodies of Water
- Areas of Natural and Science (ANSI)
- Creeks
- Canadian Pacific Kansas City Rail line
- Wellington County Boundary

Trails



2.1 Existing Planning Framework

Official Plan

The subject lands are designated as follows in the County of Wellington Official Plan:

- Schedule A7: County Growth Structure (Puslinch): *Greenbelt Area* as illustrated in **Figure 5**;
- Schedule B7: Land Use (Puslinch): *Recreational, Secondary Agricultural, Core Greenlands* and *Greenlands* as illustrated in **Figure 6**; and
- Schedule B7-3: Greenbelt Plan (Puslinch): Greenbelt Protected Countryside and Greenbelt Natural Heritage System as illustrated in **Figure 7**.

Lands within the *Recreational* designation are generally associated with lakes, ponds and similar resources that have the potential to accommodate development of recreational or seasonal residential uses relying on recreational activities. Permitted uses within this designation include seasonal recreational uses, active and passive recreational activities, commercial activities related to/serving recreational activities and publicly accessible built and natural settings for recreation.

Lands within the *Core Greenlands* and *Greenlands* designations generally include features and areas that are part of the County's natural heritage system, or areas of natural hazards. Lands in the *Secondary Agricultural* designation generally include areas of non-prime farmland and as such a broader range of residential, employment and community uses are permitted. Lands within seasonal and recreational use areas and secondary agricultural areas are considered part of the Rural System in the County of Wellington Official Plan.

The subject lands are not located within a Sourcewater Protection Area per the Halton-Hamilton Source Protection Plan as illustrated in **Figure 8**.

Zoning By-law

The subject lands are zoned *Resort Commercial (RC)* with site-specific special provisions applying to the portion of the lands both north (RCsp47) and south (RCsp43) of the rail corridor in the Township of Puslinch Zoning By-law 023-18 as shown in **Figure 9**. Existing natural features on the subject lands are zoned *Natural Environment (NE)*, and are subject to the Environmental Protection Overlay. The Environmental Protection Overlay also applies to small areas of the subject lands zoned for resort commercial purposes.

The Resort Commercial Zone regulates commercial recreational uses on lands designated Recreational in the County Official Plan, with commercial recreational uses, community uses, golf courses, mini-golf courses, places of entertainment, public parks, and travel trailer parks being among the uses permitted in the zone. Restaurants and retail stores are only permitted as accessory uses.

Site-specific special provision sp43 applies to the subject lands south of the rail line and permits the following additional uses:

- travel trailer park to a maximum of 200 recreational vehicle sites;
- single dwelling unit;
- concession stand for food sales;
- picnic shelters; variety store;

- laundromat;
- baseball diamonds; and
- washrooms.

Tent camping is prohibited by sp43.

Site-specific special provision sp47 applies to the subject lands north of the rail line and permits the following additional uses:

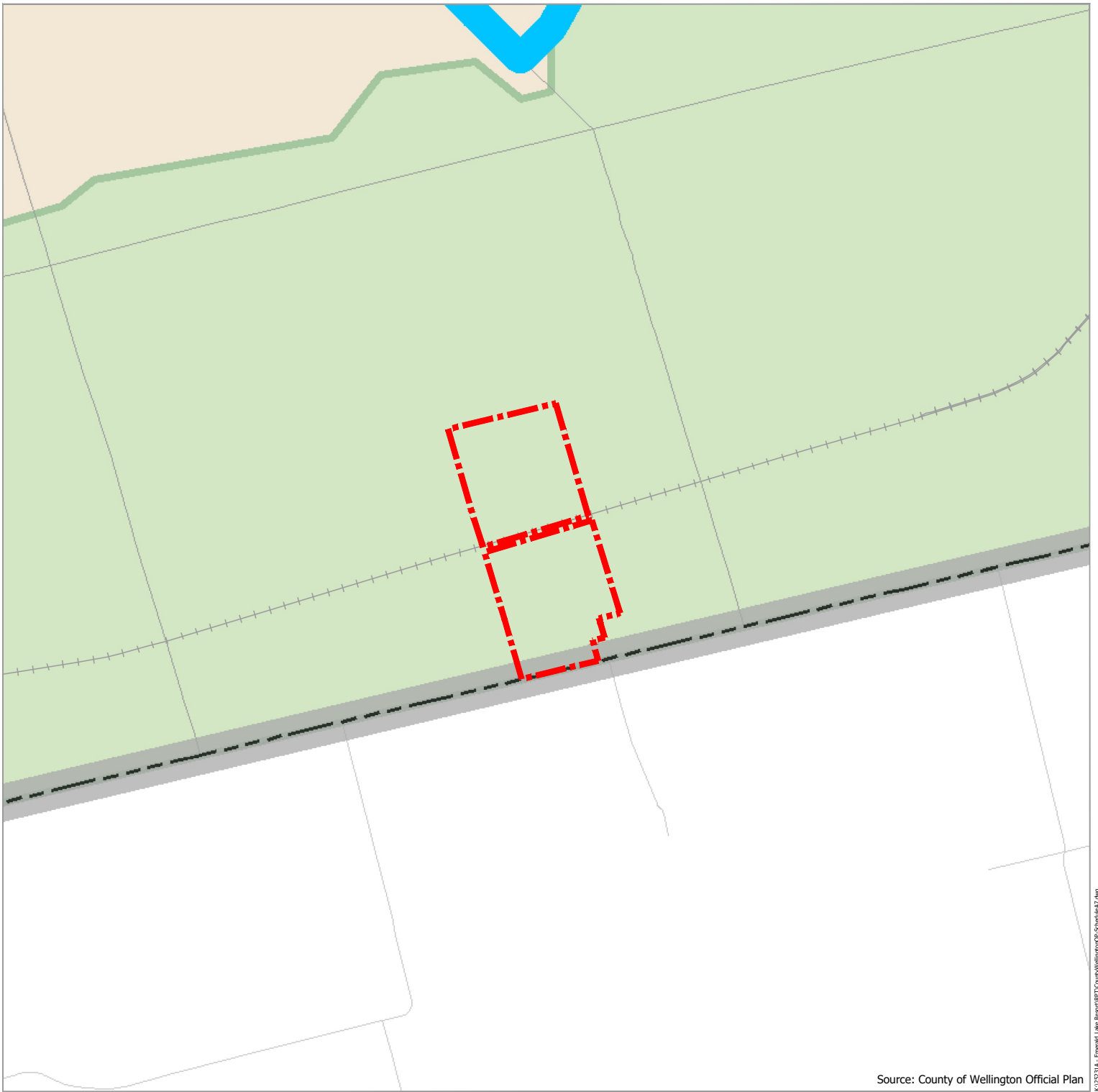
- day picnicking;
- washrooms;
- concession stand with food sales;
- pools and water slides;
- mini golf,
- volleyball courts,
- horseshoe pits,
- picnic shelters, and
- playgrounds.

The provisions of sp43 and sp47 were amended by By-law 14/94 in January 1994, which was intended to recognize recreational land uses which existed at that time within Emerald Lake. The limits of the site-specific Recreational Commercial zone that applies to the subject lands generally aligns with the limit of the Fletcher Creek PSW/ANSI.

The Natural Environment Zone regulates natural heritage features, flood prone areas and hazard lands within the Township and generally apply to lands designated Core Greenlands in the County Official Plan. Permitted uses include conservation, agriculture, and public parks that do not include buildings or structures. The Environmental Protection Overlay corresponds to the Greenlands designation in the County Official Plan and identifies features that may require further review prior to development approvals or the issuance of a building permit. Per Section 13.2 of the Zoning By-law, development may be permitted within a part of a woodland, stream, or pond provided it has been demonstrated to the satisfaction of the Township that there will be no negative impact on the feature or its ecological functions.

The adjacent lands, 7260 Gore Road, are designated Secondary Agriculture in the County of Wellington Official Plan. Permitted uses within this designation include small scale commercial, industrial and institutional uses; public service facilities; and all uses permitted in the Prime Agricultural Area designation. Single detached dwellings are permitted in the Prime Agricultural Area designation and are therefore permitted on 7260 Gore Road. As noted earlier, 7260 Gore Road already contains a single detached dwelling.

7260 Gore Road is zoned Agricultural (A) in the Township Zoning By-law, which permits single detached dwellings. Section 11.4 of the Zoning By-law establishes reduced agricultural lot requirements for lots zoned Agricultural within a plan of subdivision registered after March 1946 and for lots created under the Planning Act (which would apply to 7260 Gore Road).



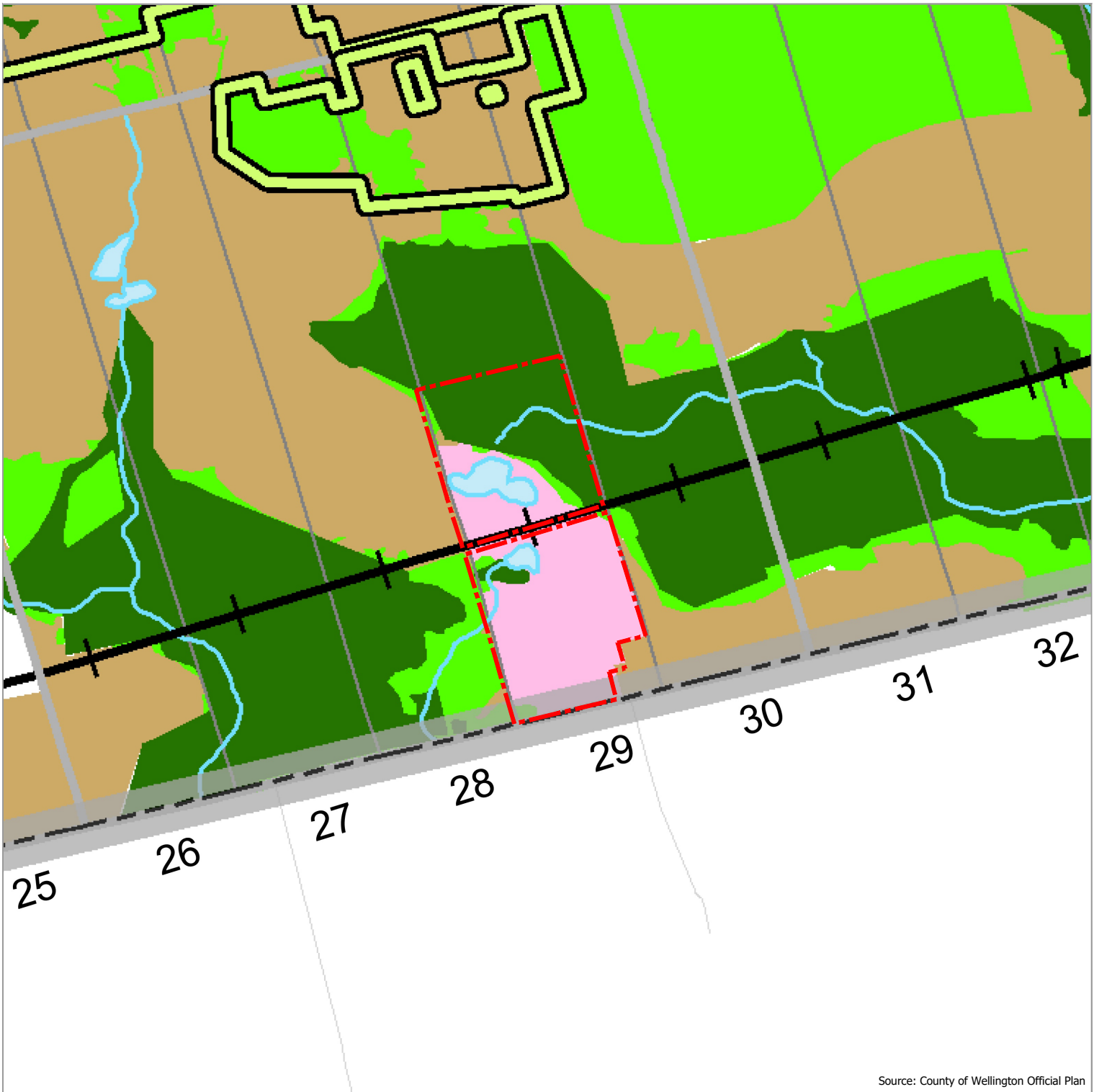
Source: County of Wellington Official Plan

Figure 5 - County of Wellington Official Plan Schedule A7 - County Growth Structure (Puslinch)

-  Subject Lands
-  Regionally Significant Economic Development Study Area
-  Greenbelt Area



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Source: County of Wellington Official Plan

Figure 6 - County of Wellington Official Plan Schedule B7 - Land Use (Puslinch)

- | | | | |
|--|------------------------|---|--------------|
|  | Subject Lands |  | Recreational |
|  | Core Greenlands |  | Waterbody |
|  | Greenlands |  | Watercourse |
|  | Earth Science ANSI |  | Railways |
|  | Primary Agricultural | | |
|  | Secondary Agricultural | | |



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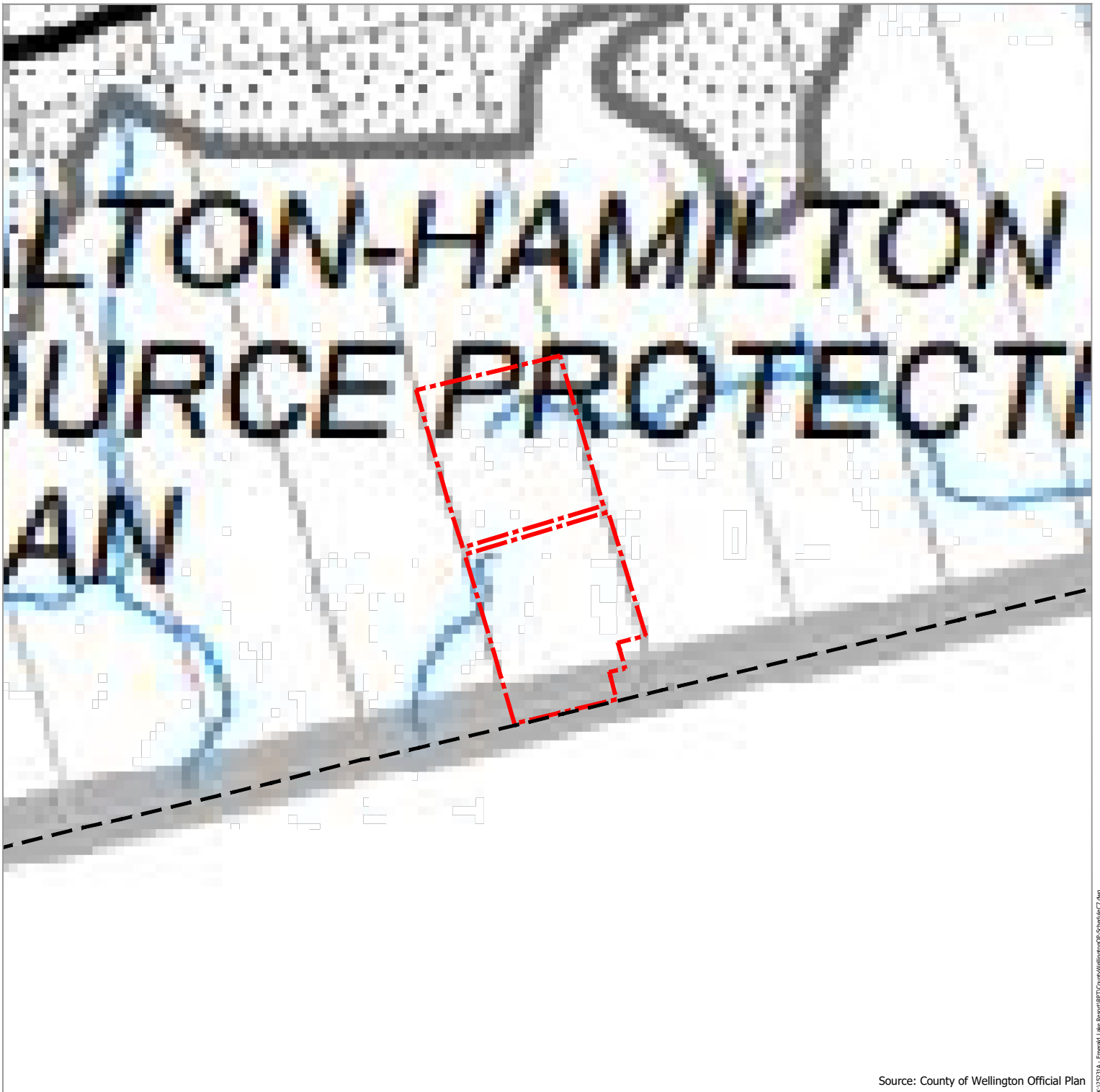
Source: County of Wellington Official Plan

Figure 7 - County of Wellington Official Plan Schedule B7-3 - Greenbelt Plan (Puslinch)

-  Subject Lands
-  Greenbelt Boundary
-  Greenbelt Protected Countryside
-  Greenbelt Natural Heritage System



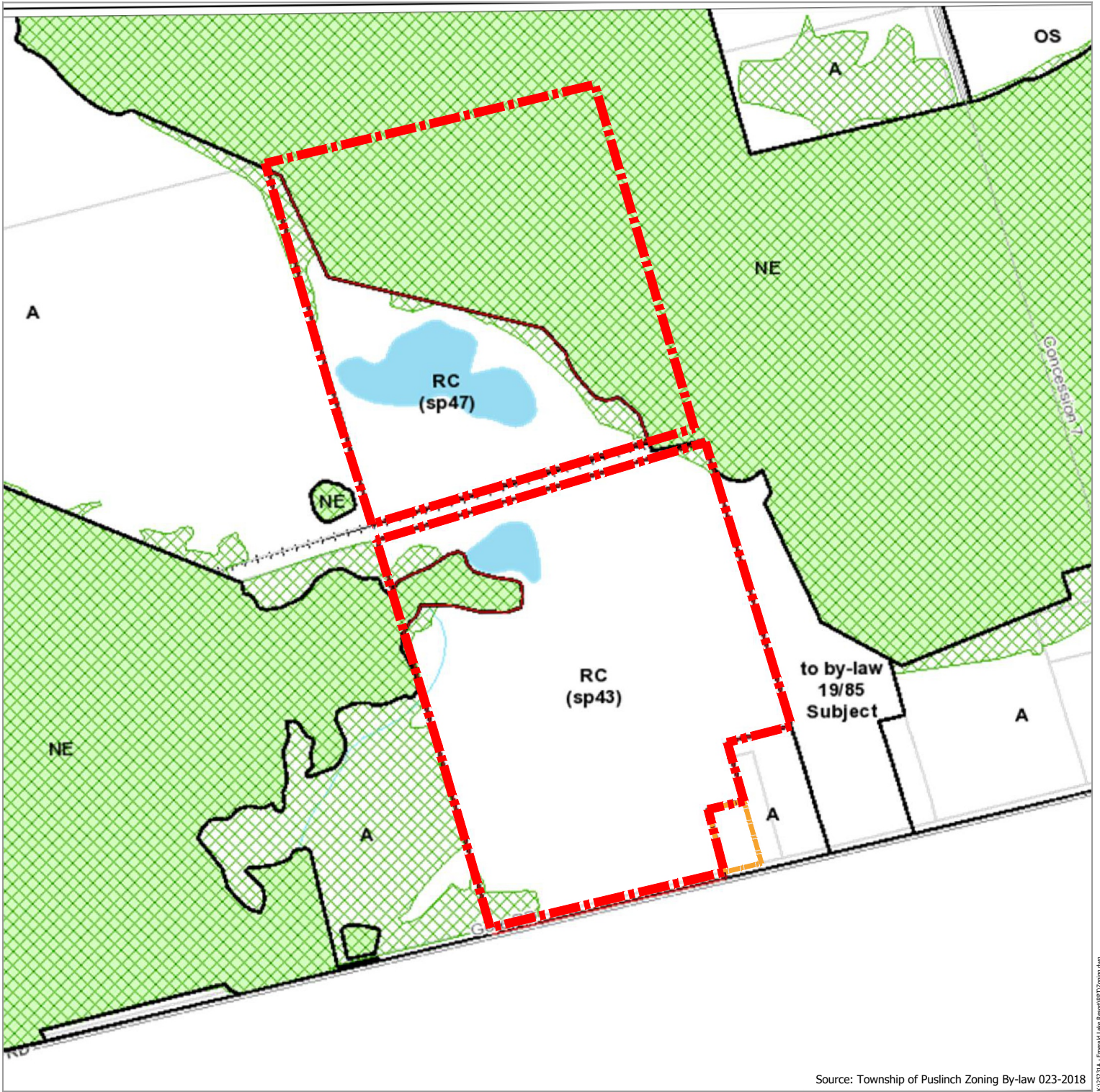
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Source: County of Wellington Official Plan

Figure 8 - County of Wellington Official Plan Schedule C7 - Sourcewater Protection (Puslinch)





Source: Township of Puslinch Zoning By-law 023-2018

Figure 9 - Township of Puslinch Zoning By-law 023-2018

-  Subject Lands
-  7260 Gore
-  Zoning Limits
-  Environmental Protection
-  Natural Environment
-  Site Specific Exemption



3.0 Emerald Lake Resort & Waterpark

Emerald Lake contains a waterpark and recreational campground, which includes recreational vehicle sites and limited campsites. The two main functions of the Park are generally separated by the existing rail line, although the two components function as one larger Park. Emerald Lake operates on a seasonal basis generally between May 1 and October 15 of each year, with specific amenities within the development having different hours of operation. The existing configuration of Emerald Lake, including amenities, trailer sites, supporting infrastructure, and internal road network, is illustrated in the Schematic Site Plan enclosed as **Figures 10a and 10b**.

Recreational Trailer Park and Campground

Trailer and Campsites

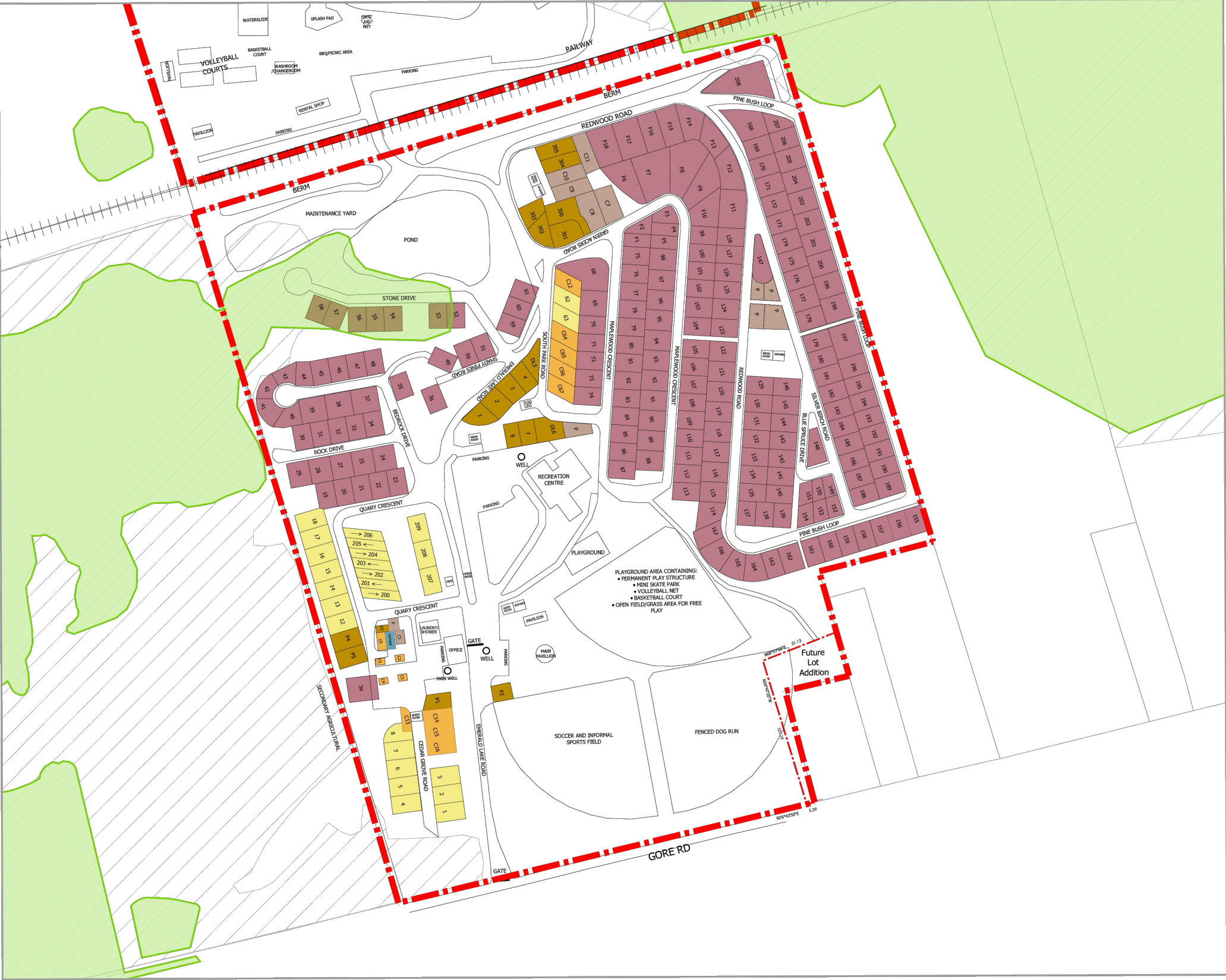
The trailer park/campground component of Emerald Lake includes 272 sites as illustrated in the Schematic Site Plan and described below:

Overview: Existing Campsites		
Site Type	Description	Number
Seasonal	Seasonal sites accommodate recreational vehicles and are serviced with 30 and/or 50 amp hydro, drinking water, and a direct sewer connection. Seasonal residents occupy the park between May 1 and October 15 of each year under an annual agreement between the seasonal occupant and Emerald Lake. Fees associated with seasonal sites include hydro, water and optional internet, and permit access to the waterpark and indoor pool throughout the season.	209
Single Trailer Full Hook Up	These include short-term recreational vehicle sites that can be booked for short duration. Each site has 30 & 50 amp hydro, water and sewer connections, - 10 of these sites are classified as "pull-through" sites, allowing for ingress and egress to these individual sites without reversing.	28
Tent Camping	These sites accommodate tent ("pop-up") trailers and traditional tent camping. Each tent camping site has a 15 amp hydro connection and individual drinking water source and is furnished with a picnic table.	23
Cabin	A total of 21 Cabins exist within the park and are either recreational vehicles with skirting and a porch or structures mounted on wooden sleighs and skirted for aesthetic purposes. In this regard, the Cabins can be moved to different areas of the campground if required	

Overview: Existing Campsites		
	and are not permanent structures affixed to the ground. Available cabins are further identified as follows:	
	Basic Cabin: accommodates up to two adults and two children. These cabins possess hydro service and an outside tap for non-potable water. Each Basic Cabin site is furnished with a picnic table and firepit.	5
	Deluxe Cabin: accommodates up to two adults and two children. Each cabin contains a main room with small kitchenette (without stove), three-piece bathroom, and two bedrooms. Each Deluxe Cabin site is furnished with firepit, small charcoal barbeque and picnic table.	9
	Deluxe Two-Family Cabin: accommodates up to four adults and four children. Each cabin contains a full kitchen, bathroom and two bedrooms. Each Deluxe Two-Family Cabin site is furnished with covered deck, picnic tables, firepit, and small charcoal barbeque.	5
	Basic Upgraded Two-Family Cabin: accommodates up to four adults and four children. The cabin contains a full kitchen, bathroom and two bedrooms. The site is furnished with a picnic table, firepit, and small charcoal barbeque.	1
	Cottage: accommodates up to two adults and three children or three adults and two children. The cottage contains a full kitchen, bathroom and two bedrooms. The site is furnished with TV and DVD player within the unit, as well as a wraparound deck, picnic table, firepit, and small charcoal barbeque.	1
TOTAL SITES		272

Images 1 to 6 on the following page illustrate the various camp and cabin sites existing within the campground as described above.

Figure 10a - Schematic Site Plan - South



SCHEMATIC SITE PLAN
SOUTH

7248 Gore Road, Puslinch,
Ontario 25231A

LEGEND

- Subject Lands (369,472.4985m²)
- Tents and Pop Up Tent Trailer Site
- Seasonal Campsites
- Single Trailer Full Hook Up Transient Sites/
Group Camping Sites
- Basic Cabin
- Deluxe Cabin
- Cottage

Township of Puslinch Zoning By-law 023-2018

- Natural Environment
- Environmental Protection Overlay

SITE STATISTICS

Approximate Lot Size	18.992 ha.
Total Site Count Estimate	272
Seasonal Campsites	209
Single Trailer Full Hook Up	28
Tent and Pop Up Tent-Trailer	23
Cabins	21

NOTES

- All dimensions are in metres unless otherwise shown.
- Contains information licensed under the Open Government Licence - Ontario.
- Well, existing structures and site locations to be confirmed.
- Original information provided not to scale by Millington and Associates.
- Existing ground conditions may vary.

DATE: March 31, 2026

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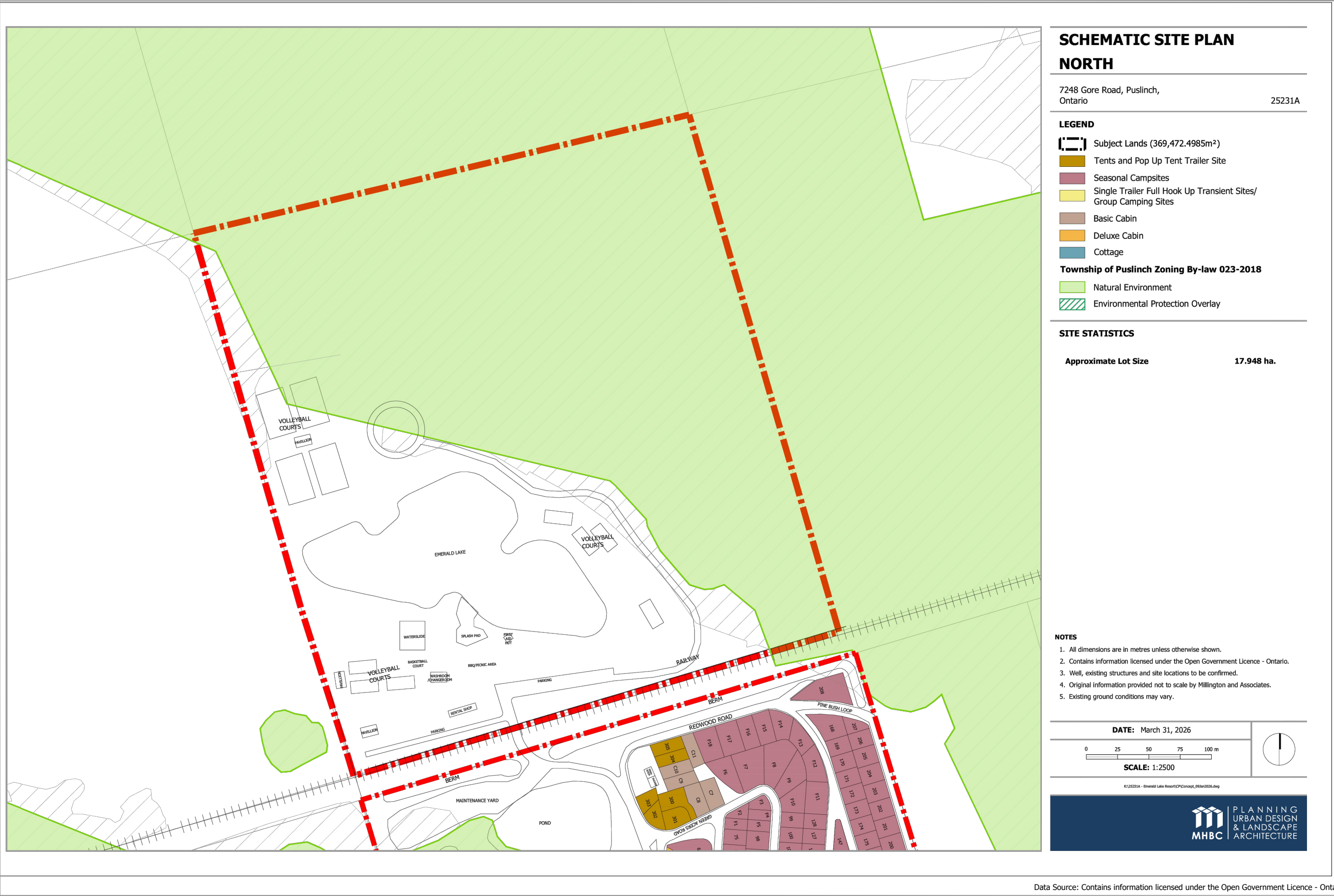
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Data Source: Contains information licensed under the Open Government Licence - Ontario

Figure 10b - Schematic Site Plan - North



Data Source: Contains information licensed under the Open Government Licence - Ontario



Image 1. Seasonal Sites



Image 2. Pull-Through Trailer Sites



Image 3. Pop-Up Tent Trailer/Tent Site



Image 4. Basic Cabin Rentals



Image 5. Deluxe Cabin Rental



Image 6. Deluxe Upgrade Cabin Rentals

Outdoor Recreational Amenities

The trailer park and campground is supported by a number of recreational amenities located in the south portion of the subject lands, which used to include baseball diamonds, as illustrated on the Schematic Site Plan. Playground facilities include a permanent play structure, skate park, basketball courts, and volleyball net, whereas the former baseball diamond adjacent to the main entrance is now used for various informal field sports, including soccer. The remaining former diamond in the southeastern portion of the site is used as a fenced-in dog run for park visitors. Horseshoe pits and pavilions are located east of the main access road beyond the entry gate booth. **Images 7 and 8** below illustrate select recreational amenities within the campground as described above.



Image 7. Skate Park and Play Structure



Image 8. Soccer/Informal Sport Field

Recreation Centre

'Emerald (Tikki) Hall' is a recreation and event centre located centrally that functions as part of the campground. A large hall and professional kitchen occupy the majority of the recreation centre, which also includes an inground pool and hot tub under a retractable dome at the south end of the building and a fitness room for use by Emerald Lake campers. The main building is approximately 4,000 square feet in size, whereas the pavilion at the reach of the main hall is approximately 3,000 square feet in size.

The hall and professional kitchen are used for park-wide events for guests of Emerald Lake and for private events and functions, including weddings, catered events, and corporate functions. The hall has a capacity of 200 people and is licensed.

Images 9 and 10 below show the Recreation Centre. The Recreation Centre was constructed in 2007.



Image 9. Emerald Hall Recreation Centre



Image 10. Indoor Pool and Hot Tub

Waterpark and Day Picnic Area

The waterpark and day use campground/picnic area ("waterpark") is accessed by an existing gravel road that extends from the main gate within the campground over the rail line. Vehicular access to the waterpark is controlled by a second gate at the railway. This gate is continually staffed, with the staff member closing the gate when a train is approaching and passing through the subject lands along the rail corridor. The waterpark operates on weekends only between mid-May and mid-June of each year, and seven days per week from mid-June to the Labour Day Monday. The waterpark includes the following features and activities as illustrated on the Schematic Site Plan:

- **Inflatable water park** within the existing spring-fed quarry lake (Emerald Lake);
- **A waterslide** and splash pool;
- **A splash pad**;
- **A shallow kids pool**;
- **Concession Stand/Snack Bar and Grill**
- **Rental Shop** offering lifejackets and non-motorized boats;
- **Sand beach area** along the southeastern shore of the lake;
- Three **picnic pavilions**;
- **Beach volleyball courts**;
- Recreational **basketball courts**;
- **Picnic area** with picnic tables located generally between the south side of the lake and existing gravel roadway; and
- **Washroom and Changeroom** facilities.

Images 11 to 15 illustrate select facilities within the waterpark as described herein.



Image 11. Beach Area around Emerald Lake



Image 12. Concession Snack Bar and Rental Shop



Image 13. Inflatable Water Park



Image 14. Waterslide, Splash Pad and Picnic Area



Image 15. Regulation Beach Volleyball Courts

Waterpark Users and Events

Campground guests are able to use the waterpark and facilities during their stay. Day users visiting the waterpark include numerous local groups and summer day camps, as well as individuals and families. Local day camps and day cares utilize the waterpark and picnic facilities generally between 9:30 in the morning to 2:30 in the afternoon, travelling by bus to and from Emerald Lake. Emerald Lake does not host its own summer camp.

The three pavilions within the waterpark are available for rent by individuals, organizations and corporations for picnics. Emerald Lake offers catering for rented pavilions as an option upon booking.

Capacity of the waterpark for day users is monitored at the main gate located off Gore Road. Parking for day users is accommodated along the gravel roadway within the waterpark.

Volleyball Club and Tournaments

The Cambridge Scorpions Volleyball Club utilizes the beach volleyball courts north of the lake for practices and competitive tournaments, with practices occurring three evenings a week from May until August annually. Tournaments are hosted on weekends occasionally throughout the summer months. Tournament participants park adjacent to the volleyball courts, separated from water park guest parking.

Site Servicing and Infrastructure

A Functional Servicing Report was prepared by Clearford Waterworks and is summarized in Section 4.1 of this Report. The following information was provided by Clearford Waterworks.

The water supply for Emerald Lake is provided from three on-site wells, each with their own water treatment system. The three water treatment systems are operated in accordance with the *Procedure for Disinfection of Drinking Water in Ontario* and are regulated under the *Health Protection and Promotion Act*, with two of the three systems administered through directives issued by the Public Health Unit. The existing water supply and treatment system is sufficient to service the existing Emerald Lake operation.

Water for fire suppression is not provided by the existing water supply and treatment systems. Emerald Lake is used as a water supply for firefighting purposes, under an agreement with the Township, according to the Owner.

Wastewater generated by the field washrooms and concession stand is collected by conventional gravity sewers and pumped to a Class IV septic system. Wastewater generated by the serviced trailer sites, field washrooms and office building in the south end of the subject lands is treated by a modular Waterloo Biofilter-based treatment system. The existing wastewater treatment systems are sufficient to continue to support the existing Emerald Lake operation. These treatment systems are governed by an existing Environmental Compliance Approval (ECA) issued by the Ministry of Environment, Conservation and Parks.

Access and Internal Road Pattern

Emerald Lake is accessed by one entrance to from Gore Road, with entry controlled by an electronic gate along Gore Road as well as a gatehouse located approximately 150 metres from the roadway. Campers are required to check in at the gatehouse upon entry for registration purposes, as well as day users of the waterpark. **Images 16 and 17** illustrate the electronic gate and gatehouse at Gore Road.



Image 16. Electronic Gate at Gore Road (Looking South)



Image 17. Gatehouse

The main road (Emeral Lake Road) within Emerald Lake extends from the gatehouse north to the waterpark, with a level crossing over the existing railway controlled by stop signs, visible signage and manual gate for vehicular traffic within the campground as illustrated in **Image 18**. The gate at the railway is monitored by staff, who close and open the gate to control traffic flow as trains pass by.



Image 18. Level Railway Crossing (Looking North)

Within the campground, internal roads extending east of Emerald Lake Road provide access to the majority of the seasonal campsites and cabins in this area of the park and loop back to Emerald Lake Road. While guests park at their individual campsites, a general parking area is provided adjacent to the comfort station (washroom and showers) in this area of the campground.

Sites located west of Emerald Lake Road are accessed by an internal road pattern consisting of both cul-de-sacs and crescents, with crescents providing access back to Emerald Lake Road.

The Recreation Centre is supported by its own access from Emerald Lake Road and associated parking. The driveway to the Recreation Centre is paved whereas the parking area is maintained as compacted gravel, similar to the internal road network.

Maintenance

Seasonal Campsites: seasonal campers are required to maintain their individual sites, including landscaping (i.e. grass cutting) and maintenance of trailers and any accessory uses/structures such as porches, decks, and stairs. Garbage and recycling are collected from seasonal sites by Emerald Lake staff and occurs Wednesdays and Sundays throughout the season.

Remaining Campsites: landscaping of remaining sites within the campground are maintained by Emerald Lake, with garbage/recycling collection occurring upon check out of guests.

Waterpark: Emerald Lake maintains all facilities within the waterpark, including garbage collection and landscaping.

Garbage and recycling collected from the campground and within the waterpark is transferred to a central maintenance and waste facility within the campground located south of the rail line and west of the main road per the Schematic Site Plan and as illustrated in **Image 19**. Waste is managed through an on-site compactor, and emptied three to four times a season by a private waste contractor.



Image 19. Maintenance Yard and Waste Facility

Employment

Emerald Lake employs between 60 and 80 individuals during the season, including gate attendants, office staff, lifeguards and concession staff within the waterpark, janitor and housekeeping staff, and maintenance crew responsible for landscaping, garbage collection, and general maintenance activities. The campground and waterpark are maintained by two staff members during the off-season, with office staff also on site.

3.1 Emerald Lake Chronology

In support of the Zoning By-law Amendment application, and to inform relevant supporting technical studies, MHBC prepared a chronology of the approvals and evolution of land use policy over time applicable to Emerald Lake, which is provided below. Corresponding relevant supporting documents, images and plans as described below are enclosed as **Appendix B** to this Report.

1. September 1983 – (Development) Agreement

The Development Agreement establishes the maximum number of recreational vehicle camp sites, that tent camping is not permitted and includes a number of clauses related to the operation of the campground. An approved development (site) plan is appended to the Agreement, which also sets out the phasing of development for individual campsites.

2. January 1994 – Zoning By-law Amendment (By-law 14/94)

The purpose of this Zoning By-law Amendment was to recognize the recreational land uses that existed in the campground at the time. Through this amendment, the site-specific provision applying to the lands north of the rail line (RCsp43) was amended to permit the following uses: pools and water slides, mini golf, volleyball courts, horseshoe pits, picnic shelters, playgrounds. The existing site-specific provision applying to lands south of the rail line (RCsp47) was amended to permit the following additional uses: concession stand for food sales, picnic shelters, variety store, laundromat, baseball diamonds, and washrooms. The amendment indicates volleyball courts were existing as of January 1994, but specific location of the courts unknown.

3. November 1998 - ECA (3-0378-98-006) issued for sewage treatment

The ECA permitted a sewage treatment and disposals system serving a 100-unit seasonally occupied (May 1- October 31) trailer park development.

4. March 11, 2004 – Amended ECA Issued

Amended ECA for upgrading of existing sewage treatment and subsurface disposal works. Noted in preamble to the ECA document that the system serves an existing 200-unit trailer park development.

5. November 2004 – Google Earth Aerial Imagery

Of particular note is the establishment of the volleyball courts north of the lake within the waterpark. The gravel road providing access to these courts was also established at that time. The volleyball courts were specifically permitted on the northern portion of the subject lands in the Zoning By-law, through a previous amendment in 1994. Lands in the northeast corner of the campground are also cleared.

6. December 16, 2004 – Greenbelt Plan Comes into Effect

The subject lands are designated Protected Countryside, with portions within Natural Heritage System. Per the mapping on Schedule 4 – Natural Heritage System, lands north of Emerald Lake are included in Natural Heritage designation, despite being developed with volleyball courts and landscaped areas.

7. March 2, 2012 – Amended ECA (Approval 6567-8GBPBV)

Amended ECA issued for an upgrade and expansion of the existing sewage treatment system to “service an expanded and existing 240 units [seasonally occupied (May 1 and October 31) trailer park development.”

8. December 19, 2014 – Ministerial approval of OPA 81 to the County of Wellington Official Plan.

OPA 81 resulted from the County’s 5-year Official Plan Review, which involved aligning the Official Plan with provincial plans and addressing areas of concern or interest identified through the Official Plan Review process. The limit of the Greenbelt Natural Heritage System overlay as it applies to the subject lands is reflected in the relevant Official Plan Schedules.

9. April 2018 – New Township of Puslinch Zoning By-law 023-18 approved

The current zoning of the subject lands as discussed in Section 2.1 of this Report reflects that which was adopted as part of the Zoning By-law in April 2018.

3.2 Zoning By-law Amendment

The existing zoning of the subject lands limits a travel trailer park to 200 recreational vehicle sites and prohibits tent camping, whereas as described earlier, Emerald Lake currently contains 272 recreational vehicle sites (with some of these sites also being used for tent camping) and additional facilities, such as a recreation centre, for use by campground guests. Furthermore, the Township passed a new Zoning By-law in 2018, which included definitions that more accurately capture the operations at Emerald Lake.

An amendment to the Township of Puslinch Zoning By-law 023-2018 is required to recognize the existing Emerald Lake operation and facilities bring it into compliance with the Zoning By-law, as well as refine the limits of the existing Natural Environment Zone and Environmental Protection Overlay boundaries based on the recommendations of the Scoped Environmental Impact Study. No new development is proposed. The proposed Zoning By-law Amendment also involves amending existing additional permitted uses to more appropriately align with use classifications and definitions of the (new) Zoning By-law and establishing new site-specific special provisions associated with the Special Provision Resort Commercial Zones applying to the subject lands (being [RC(sp43)] and [RC(sp37)]).

The amendment also involves rezoning a small portion of the subject lands to the Agricultural (A) Zone in support of the proposed lot line adjustment involving 7260 Gore, which is discussed further in Section 3.3 of this Report below.

The proposed Zoning By-law Amendment is illustrated in **Figure 11**, with a full analysis of the requested additional permitted uses and special provisions included in Section 5.4 of this Report. A draft of the proposed Zoning By-law Amendment is included as **Appendix A**.

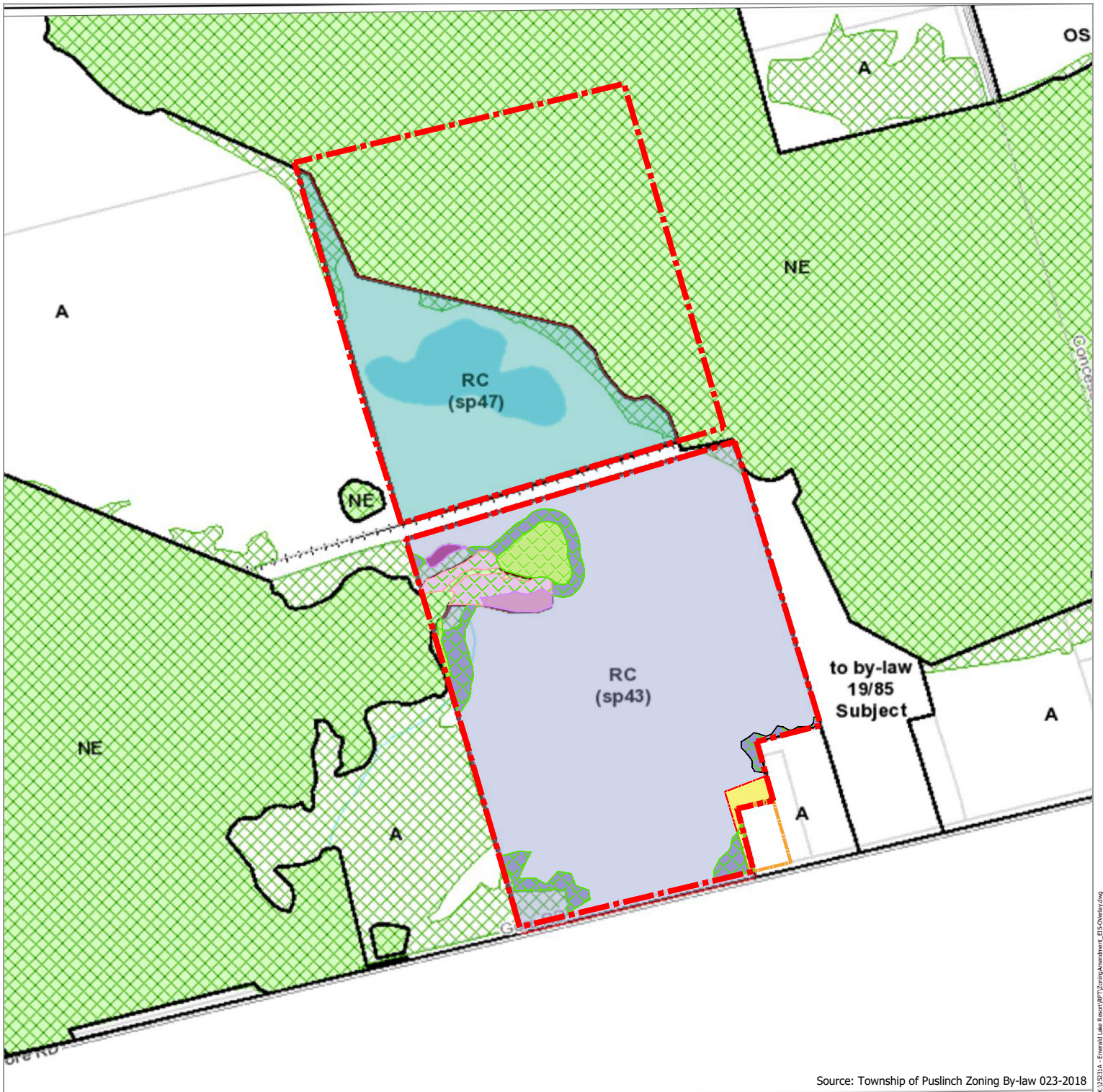
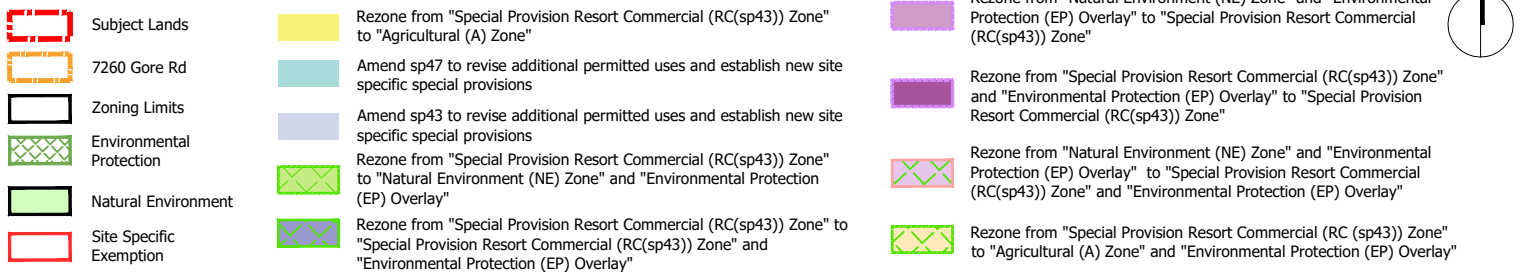


Figure 11 - Proposed Zoning Amendment



3.3 Consent – Lot Line Adjustment

An application for Consent – Lot Line Adjustment is being advanced to the County of Wellington concurrent with the Zoning By-law Amendment application. The proposed lot line adjustment proposes to add approximately 1,967 square metres from the subject lands to 7260 Gore to refine the lot boundary to:

- Regularize the shape of the existing single detached lot;
- Provide additional rear yard area for the existing dwelling;
- Ensure the lot complies with the minimum lot area and rear yard requirements of Section 11.4 of the Zoning By-law; and
- Provide additional separation between the existing dwelling and campground.

Following the lot addition, 7260 Gore would have a total lot area of approximately 0.54 ha with approval of the application. The proposed lot line adjustment is illustrated in **Figure 12** and evaluated herein.



Figure 12 - Proposed Lot Addition (Lot Line Adjustment)

-  Subject Lands (area excluding lot addition- 18,8024.76 m²)
-  Future Lot Addition (1,967.68 m²)
-  7260 Gore (3,500.63m²)



4.0 Summary of Supporting Studies

The following section summarizes the supporting reports that were prepared in support of the proposed Zoning By-law Amendment.

4.1 Functional Servicing Report

Clearford Waterworks (Clearford) prepared a Functional Servicing Report that outlines the existing servicing strategy for Emerald Lake. The following provides a summary of the proposed servicing strategy and main findings of the report:

- The onsite communal, sanitary servicing provided at Emerald Lake is sufficient for the existing site user load and occupancy.
- The water supply system is operated and managed in accordance with the requirements under the Ontario *Health Promotion and Protection Act*.
- The apparent well yield and treatment system capacity for the water treatment system in the office building can support future expansion.
- The Class IV wastewater system serving the field washrooms and concession stand in the water park area is appropriately sized for the expected loading. There have been no reported break outs from the bed area.
- The communal Waterloo Biofilter-based treatment system servicing the seasonally occupied areas of the site is providing treatment to meet the existing loading; however, it is operating at the expected limit of its capabilities. No additional loading is recommended for the system; however, no expansion is required to continue to service the existing site users.
- The existing Environmental Compliance Approval requires minor amendments to reflect current operating conditions and ensure compliance with the description of the works.

4.2 Nitrate Impact Assessment

Clearford Engineering prepared a memorandum discussing the impact of nitrates generated by the existing onsite sewage system. The following provides a summary of the proposed servicing strategy and main findings of the report:

- The Class 4 sewage system and Waterloo Biofilter (WBF) with shallow buried trench (SBT) disposal beds operated under the Ministry of the Environment, Conservation and Parks (MECP) Environmental Compliance Approval (ECA). The ECA establishes effluent objectives, including a nitrate target of 5 mg/L, but not enforceable concentration limits.
- While effluent sampling from 2018-2025 showed nitrate concentrations frequently exceeded the ECA objective during parts of the operating system, this is typical for seasonal recreational systems because biological denitrification processes are difficult to maintain during fluctuating occupancy, low early-season temperatures, and inconsistent wastewater loading.
- A review of annual performance reports for the WBF system from 2005 through 2025 provided consistent analysis of the impact of the system on groundwater quality, with samples collected from monitoring wells consistently showing very low concentration of nitrate downgradient of the SBT.
- Annual performance reports concluded that the onsite systems had a negligible impact on the groundwater quality as a result of the significant nutrient uptake near to an immediately downstream of SBTs.
- Data points from months it was possible to collect samples from the groundwater monitoring wells showed no adverse impact of the groundwater quality adjacent to the downgradient property boundary, with the measured concentration of nitrate nitrogen well below the 'reasonable use guideline' limit of 2.5 mg/l at the property edge.
- Based on a review of historic annual reports for the systems and a review of recent samples of groundwater collected from monitoring wells on the site shows there was no observed or expected adverse impact on the groundwater quality at the downgradient property boundary.

4.3 Environmental Noise and Vibration Letter

SLR prepared an Environmental Noise and Vibration Opinion Letter that assesses potential transportation noise and vibration impacts from the CPKC rail corridor and Gore Road. The following provides a summary of the assessment:

- Based on the applicable definitions of the Ministry of Environment, Conservation and Parks (MECP) Publication NPC-300 Guidelines, the existing trailer resort and waterpark is not considered a noise-sensitive receptor for transportation noise within NPC-300's land use planning framework, and therefore no assessment of roadway or railway noise is required.
- The Federation of Canadian Municipalities and the Railway Association of Canada (FCM/RAC) *Guidelines for New Developments in Proximity to Railway Operations* (Guidelines) do not specify requirements for camp sites/campgrounds as noise-sensitive receptors for assessing transportation related noise, specifically from railways.
- The FCM/RAC Guidelines recommend conducting a vibration assessment for structures within 75 metres of a railway line. As there are no permanent structures located within 75 metres of the CPKC Subdivision, an assessment is not required.

4.4 Scoped Environmental Impact Study

Aboud & Associates Inc. (Aboud) prepared a Scoped Environmental Impact Study (EIS) to: (1) determine if the existing Emerald Lake operation was retroactively compliant with the applicable environmental policies in effect at the time of development within the subject lands, based on a review of available historic aerial imagery and mapping; (2) assess the impacts resulting from any development that was not in compliance with the applicable policy framework at the time; (3) provide recommendations for mitigation and restoration where non-compliant development took place; and (4) propose appropriate buffers that protect significant and sensitive significant natural heritage features on the subject lands over the long term. The following provides a summary of the main findings of the report:

Features

- Area immediately west of the small pond in the southern portion of the subject lands is designated Core Greenlands in the County of Wellington Official Plan and is comprised of open bedrock, appearing as a white feature in historic air photos and imagery. This may have contributed to improper interpretation of this area as a wetland during previous iterations of wetland mapping. A wetland is not currently present, nor was present at any time on the subject lands in this area and should not be considered Core Greenland (see **Appendix C** – Figure 2).
- There has been an increase in wetland features and the limits of the boundary in relation to the western property limit in the southern portion of the subject lands, with an increase in swamp thicket and coniferous swamp communities as agricultural use ceased and plantations failed. These communities were identified as being quite young. A preliminary desktop wetland boundary has been delimited based on the limits of wetland communities within the study area. A preliminary woodland boundary has also been delimited based on the limits of wetland communities within the study area (see **Appendix C** – Figure 1c).

Site Development

- By 2004, site development within the northern property development was complete and matching site conditions identified in current air photos, indicating that all recreational development in the northern portion of the subject lands was existing as of the in-effect date of the Greenbelt Plan. Recreational land use limits have not changed since at least 1997, no changes to the limits of natural heritage features were observed, and recreational uses appear to be consistent with previous years.
- With respect to the southern portion of the subject lands, by 2004:
 - The northeastern corner continues to be cleared to the property limits, with evidence of site materials and a small berm extending south of the rail berm, and evidence of site works or grading already complete or underway in this area.
 - Most of the recreational area was existing, apart from a few small contiguous treed areas.
- Post 2004 in the southern portion of the subject lands, several small areas of tree removal were noted in the northwest were noted in the northwest corner, around the western side of the small pond and small sections to the immediate south to accommodate material storage. These removal areas were contiguous to small coniferous woodland feature and the adjacent property woodland and took place (approximately) between 2009 and 2012, and in 2014.

- Per Google Earth Historic Imagery, recreational uses were fully developed and concurrent with existing conditions by 2015.

Impacts

- The 0.22 ha of woodland removed between 2009 and 2014 is offset by approximately 0.24 ha of expansions in the woodland limit that occurred after 2004, resulting in an overall increase in woodland cover of approximately 0.02 ha at the site level (see **Appendix C** – Figure 3). In this regard, minor site alteration (removal of trees within a woodland) occurred within the Greenlands designation, however there has been an overall increase in woodland cover.
- No impacts to regulated wetland features appear to have occurred and any site development within regulation limits to these features occurred prior to 2004.
- No changes to the location or limits of the watercourse associated with the small pond were noted following the review of historic imagery and available mapping layers, however minor impacts may have occurred due to the removal of woodland in the vicinity of the watercourse.

Legislation and Policy Compliance

- Any site development that occurred prior to 2005 would not likely have constituted a violation under the Provincial Policy Statement (PPS), as clear protection of natural heritage features was not identified prior to the 2005 PPS. No net loss of significant woodland has been noted on the subject lands since 2004.
- Almost all recreational uses on the subject lands were existing as of the in-effect date of the Greenbelt Plan, except for the small woodland removals in the area around the small pond and around the southwestern woodland limit. These minor intrusions would not in the professional opinion of Aboud constitute an expansion or establishment of a major recreational use that would be expected to require an application under the Greenbelt Plan and therefore the existing development is considered in compliance with the Greenbelt Plan.
- With respect to the wetland policies of the Hamilton Conservation Area, any site alteration within the limits of the regulated area since 2004 have generally only included tree and vegetation removal, without any changes to the landscape or the erection of buildings or structures and would therefore not constitute development or development activities within the regulation limit. No wetland removals have occurred and while several sites and trailers are located within the regulation limit, none have encroached into the limits of the regulated features.
- The aforementioned tree removals did not change the status or ecological functions of the significant woodland, based on the location of removals at the edge of the feature and the composition of the feature as an eastern white cedar coniferous forest with little to no understory vegetation. As a result, the removal is not considered a negative impact to the greater significant woodland.
- No buildings or structures have been erected within the Natural Environment Zone or Environmental Protection Overlay since the in-effect date of the Township of Puslinch Zoning By-law 023-018.
- The development of Emerald Lake has not resulted in negative impacts to the existing natural heritage features and is in compliance with the applicable policies and regulations that are applicable to the site, based on the review undertaken in the EIS.

Mitigation and Recommendations

- Mitigation is recommended to provide a buffer to existing natural features, where development is immediately adjacent to improve the ecological function of these features and to ensure no future encroachment. Buffers are proposed within the southern portion of the subject lands in the northwest corner to the watercourse between the small pond and property limits and the southwestern corner between the woodland and transient trailer sites (see **Appendix C** – Figure 4).
- A minimum 5 m buffer to the watercourse within the property limits is recommended to ensure continued compliance with policies of the Hamilton Conservation Authority (see **Appendix C** – Figure 4).
- The limits of the wetland and woodland features should be confirmed with representatives from the Conservation Authority and the Township.
- As part of the future Site Plan Amendment application, a native and site appropriate enhancement planting plan should be implemented within the recommended areas of woodland and watercourse buffers to ensure long term protection of natural heritage features on site (see locations in **Appendix C** enclosed).
- Ensure the future zoning considers the confirmed limits of natural heritage features and recreational features uses on site, including removal of the Core Greenland designation (understood for the purposes of the Zoning By-law Amendment to mean the Natural Environmental Zone category) within the area south west of the pond given likely the mis-identification of this area as containing a wetland feature; and
- Native tree and shrub enhancement plantings along other woodland and wetland edges within the property should be installed to mitigate future impacts from recreational use and discourage recreational uses within significant features.

5.0 Policy Analysis

The following discussion outlines how the proposed development and supporting applications consider and address relevant policies of the Provincial Planning Statement, 2024, Greenbelt Plan, 2017, and County of Wellington Official Plan; and regulations of the Township of Puslinch Zoning By-law.

5.1 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024 (PPS) was issued by the Province of Ontario in accordance with Section 3 of the Planning Act on August 20, 2024, and came into effect on October 20, 2024.

The PPS sets the policy foundation for regulating the development and use of land within the Province, and supports a comprehensive, integrated, and long-term approach to planning. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure. The PPS encourages a diverse mix of land uses in order to provide choice and diversity to create complete communities. The following is an analysis of the proposal in the context of the policies in the PPS.

5.1.1 Rural Lands

The subject lands are consistent with the PPS 2024 definition of 'rural lands' given they are located outside of a settlement area and the prime agricultural area of the County of Wellington. Section 2.6 of the PPS 2024 provides general policies for rural lands. Policy 2.6.1 b) identifies resource-based recreational uses as a permitted use on rural lands within municipalities. Policies 2.6.2 and 2.6.3 include policies for development on rural lands:

- development that can be sustained by rural service levels should be promoted; and
- development shall be appropriate to the infrastructure which is planned or available and therefore avoid the need for its uneconomical expansion.

Emerald Lake is supported by on-site water and wastewater treatment systems that are considered adequate to service the use and existing operation, as demonstrated in the Functional Servicing Report. The Park has been operating for over 40 years and has been adequately served by Gore Road and the surrounding road network, noting that the Park only operates for a small part of the year.

5.1.2 Natural Heritage

Section 4.1 of the PPS 2024 includes policies for natural heritage resources. More specifically, Subsection 4.1.1 states that natural heritage features and areas shall be protected for the long term. A portion of the Fletcher Creek PSW and ANSI is primarily located on the northeastern portion of the subject lands as illustrated in **Figure 3** and is located adjacent to manicured landscaped areas, the internal gravel road system and volleyball courts that have generally been in existence and in their current layout for

over 20 years. In accordance with Subsections 4.1.4 (a) and 4.1.5 (d), development and site alteration is not permitted within PSWs and shall not be permitted in significant ANSIs unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Through the Scoped EIS, a preliminary wetland boundary and woodland boundary has been delineated, and the extent of significant woodlands identified. Development has not occurred within the wetland limit.

Generally, development and site alteration is not permitted on adjacent lands to natural heritage features and areas unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions in accordance with Policy 4.1.8. The Scoped EIS concluded that the existing Emerald Lake operation has not resulted in negative impacts to existing natural heritage features and further recommends that:

- (1) buffers be established in select areas in the southern portion of the subject lands; and
- (2) native tree and shrub plantings be installed along other woodland and wetland edges within the subject lands, to mitigate future impacts from recreational use and discourage recreational uses within significant features.

5.1.3 Sewage, Water and Stormwater

Section 3.6.3 directs that where municipal water and sewage services are not available, planned, or feasible, private communal water and sewage services are the preferred form of servicing for multi-unit/lot development in the interest of protecting the environment and minimizing potential risks to human health and safety. Emerald Lake is currently serviced by four water supply wells and three water treatment and distribution systems providing a potable water supply and a wastewater collection system that conveys wastewater flows to one of two on-site wastewater treatment plants on the subject lands. The wastewater system is governed by an existing ECA issued by MECP and two of the three water treatment and distribution systems are operated under a Directive issued by the Wellington-Dufferin-Guelph Public Health Unit. These systems are consistent with the definitions of 'private communal sewage services' and private communal water services' in the PPS 2024 and the Functional Servicing Report confirms they are adequate to support the existing development on the lands.

In consideration of the above, in our opinion the Zoning By-law Amendment application is consistent with the Provincial Planning Statement, 2024.

5.2 Greenbelt Plan, 2017

The Greenbelt Plan, amended in 2017, was prepared and approved under the *Greenbelt Act, 2005* and took effect on December 16, 2004. The purpose of the Greenbelt Plan is to permanently protect a broad band of agricultural lands, natural heritage systems, and water resources around the Greater Golden Horseshoe. As outlined in the *Greenbelt Act*, decisions under the *Planning Act* must conform to the Greenbelt Plan.

The subject lands are designated *Protected Countryside*, with the northeastern portion of the lands further located within the *Natural Heritage System* overlay, as illustrated in **Figure 7**. The subject lands are consistent with the definition of 'rural lands' in the Greenbelt Plan as they are primarily designated for Recreational purposes in the County of Wellington Official Plan and are located outside of the prime agricultural area and settlement areas. In accordance with Section 4.1, rural lands of the Protected Countryside are intended to, in part, support a range of recreation and tourism uses, including campgrounds. In this regard, the existing use of the subject lands is permitted in the Greenbelt Plan.

Furthermore, existing uses within the Protected Countryside – being '*uses legally established prior to the date that the Greenbelt Plan came into force on December 16, 2004*' – are permitted by Policy 4.5.1. The current zoning of the subject lands, established by By-law 14/94 in January 1994, permits a day picnicking, concession stand, volleyball courts, and pools, waterslides and water activities on the northern portion of the subject lands. **Figures 13 and 14** illustrate the limit of the Greenbelt Plan Natural Heritage System in relation to facilities that existed in both 2000 and in the fall of 2004, prior to the in-effect date of the Greenbelt Plan. Volleyball courts in the north and northeastern portions of the subject lands, as well as the associated internal roadway, are located within the Greenbelt Plan Natural Heritage System but these uses pre-date the Greenbelt Plan and are considered 'existing uses'. Similarly, additional trailer sites were under development in the northeast corner of the trailer park (permitted under the in-effect zoning) located within the Greenbelt Plan Natural Heritage System, prior to the in-effect date of the Greenbelt Plan.

The existing uses on the subject lands, including those located within the Natural Heritage System overlay, are permitted existing uses that conform to and are consistent with the intent and policy framework of the Greenbelt Plan.

5.3 County of Wellington Official Plan

The County of Wellington Official Plan ('County Official Plan') was adopted by Wellington County Council on September 24, 1998, approved by the Ministry of Municipal Affairs on April 13, 1999, and came into effect on May 6, 1999.

The subject lands are designated *Greenbelt* on Schedule A7: County Growth Structure (Puslinch); *Recreational*, *Secondary Agriculture*, *Core Greenlands*, and *Greenlands* on Schedule B7: Land Use (Puslinch); and *Greenbelt Protected Countryside* and *Greenbelt Natural Heritage System* on Schedule B7-3: Greenbelt Plan (Puslinch) as illustrated in **Figures 5 to 7** herein, respectively. The following is an analysis of the Emerald Lake campground and waterpark with respect to the applicable policies of the County Official Plan.

5.3.1 Recreational Designation

Lands within the Recreational designation form part of the Rural System as per Section 6.1 of the County Official Plan. Permitted uses within the designation include seasonal recreational uses, active and passive recreational activities, and commercial activities related to and serving recreational activities, among others, as per Policy 6.7.2. The elements of the Emerald Lake operation are permitted in the Recreation designation as follows:



Figure 13 - Natural Heritage System Area (Aerial Imagery, 2000)

-  Subject Lands
-  7260 Gore
-  Natural Heritage System Area



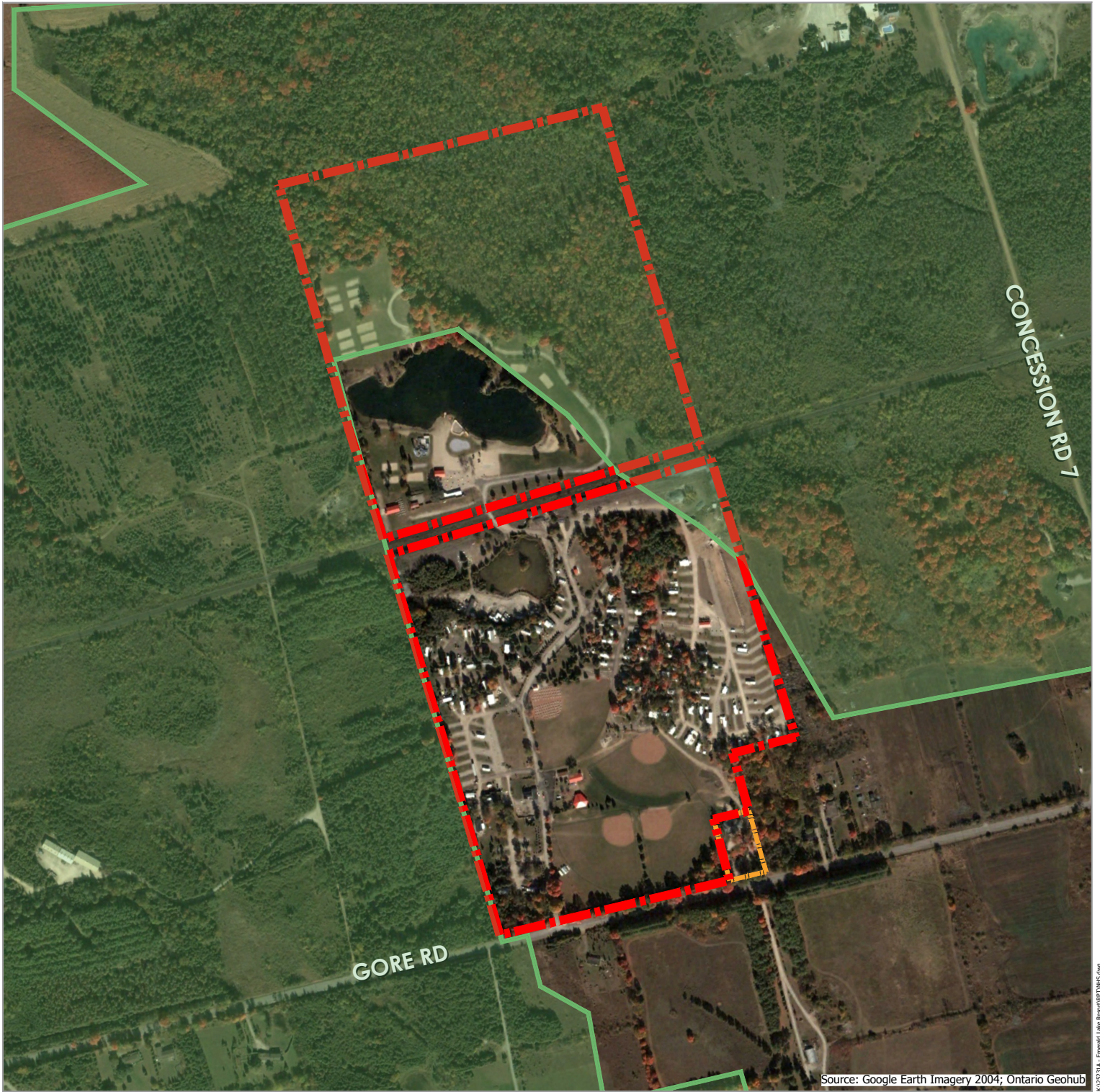


Figure 14 - Natural Heritage System Area (Aerial Imagery, 2004)

-  Subject Lands
-  7260 Gore
-  Natural Heritage System Area



- travel trailer sites, camping sites, water park and associated facilities (i.e. waterslide and kiddie pool) as *'seasonal recreational uses'*;
- picnic areas and pavilions in the north end of the railway, volleyball and sport courts, and playgrounds as *'active and passive recreational uses'*;
- concession stand/seasonal snack bar, lifejacket and boat rentals and souvenir shop, and recreation centre (Emerald Lake Hall) as *'commercial activities related to serving recreational activities'*.

Policy 6.7.5 outlines the criteria for the establishment of tent and trailer parks within the Recreational designation. The current zoning of the campground permits a travel trailer park, but limits the number of sites to 200 and prohibits tent camping. Emerald Lake currently contains 272 recreational vehicle sites, 23 of which are also offered for tent camping purposes. The following is a review of the existing trailer park to the criteria contained in Policy 6.7.5, applicable to tent and trailer parks:

a) Access to an open public road;

Gore Road is a paved Township Road and is the main access to the subject lands.

b) An internal road system which will allow ease of access for emergency vehicles;

The internal road system is generally gravelled throughout Emerald Lake, with the exception of the southern portion of Emerald Lake Road serving as the main driveway entrance from Gore Road to Emerald Lake Hall. With respect to emergency vehicle access, the Owners advise that a third-party company specializing in fire safety systems, life safety systems and related services inspects the campground annually in May to ensure accessibility and existing fire routes are maintained, and fire extinguishers and sprinkler systems are in working order and serviced as required. It is noted that a future site plan amendment process provides opportunity to confirm ease of access for emergency vehicles to the Township's satisfaction.

c) Adequate water and sewage services;

Existing water and sewage systems on the subject lands are sufficient to service all facilities, amenities and sites as they exist today within Emerald Lake, as demonstrated in the Functional Servicing Report.

d) A design which provides individual sites sufficient to:

- *site a tent or trailer*
- *provide adequate separation between tents and trailers for fire protection and privacy*
- *provide an on-site amenity area*

The Township of Puslinch Zoning By-law does not contain provisions to regulate the minimum area or frontage for individual trailer sites, separation between individual seasonal trailers, or a minimum amenity area associated with the trailer site. Each trailer site has been functioning without issue and is sufficient to site trailers in either a seasonal (permanent), pull-through, or back-in arrangement. Each site, regardless of type, is equipped with an on-site amenity area consisting of, at minimum, a fire pit area and picnic table.

- e) Agreements that regulate the operation of the park and provide for a maximum nine months of operation per year.*

Emerald Lake operates from May 1 to October 15 each year. Leases are renewed with seasonal trailer site occupants, who pay annual fees towards the maintenance of the trailer park.

The layout and functioning of the trailer park component of Emerald Lake generally meets the criteria of Policy 6.7.5 as demonstrated above.

Policy 6.7.7 provides direction with respect to active and passive recreation uses such as picnic areas, and sports fields and buildings and structures and facilities which support active and passive recreation facilities and states that such uses are permitted provided that:

- a) adequate provisions are made for services include road access, water and sewer facilities;*
b) other policies of this plan are met.

Emerald Lake is serviced by an internal gravel road system and private communal water and wastewater system as discussed throughout this Report. Emerald Lake and its current operations also conform to the relevant policies of the County of Wellington Official Plan, as demonstrated herein.

It is noted that the Recreational Areas policies of the County Official Plan are silent with respect to maximum trailer or tent site density and as such does not limit the number of sites in an individual tent and trailer park.

5.3.2 Core Greenlands and Greenlands Designations

Figure 2 in **Appendix C** illustrates the limits of the Core Greenlands and Greenlands designation as they apply to the current configuration of Emerald Lake. As noted in the Scoped EIS, the development of the volleyball courts north of the (Emerald) Lake and internal roads as they relate to the limit of the Core Greenlands and Greenlands designation were developed by 1997. The Core Greenlands designation in the southern portion of the subject lands, applies in part to an area within Emerald Lake currently developed with trailer park sites. As noted in the Scoped EIS, this area is generally comprised of open bedrock, and the area should not be considered Core Greenland. The small portion of wetland as identified in the Scoped EIS within this area is within the Core Greenlands designation and is not developed.

The Greenlands designation applies generally to the northeastern, northwestern, and southwestern corners of the southern portion of the subject lands. As noted in the Scoped EIS, approximately 0.22 ha of significant woodland had been removed from lands generally within the Greenlands Designation between 2009 and 2014, whereas the significant woodland has expanded in other areas on the subject lands by a total of 0.24 ha since 2004, including through the planting of trees by the Owner (see Figure 3 in **Appendix C**). Policy 5.6.2 directs that where development is proposed in the Greenland system or on adjacent lands, the developer shall be required to identify the nature of features potentially impacted, prepare an environmental impact assessment where required, consider the enhancement of the natural area where appropriate and reasonable, and address the relevant requirements of the environmental impact assessment policies of the County Official Plan.

While no new development is proposed as part of the Zoning By-law Amendment application, a Scoped EIS was prepared under a Terms of Reference developed with input from relevant agencies and

Township peer-review consultants and concluded the development of Emerald Lake over time has not resulted in negative impacts to existing natural heritage features. With respect to tree removals from lands within the Greenlands designation, the Scoped EIS further concluded that the removals did not change the status or ecological functions of the significant woodland based on the location of the removals and the composition of the feature itself, and therefore the removals were not considered a negative impact to the greater significant woodland. The establishment of buffers in specific areas along the western limit of the southern portion of the subject lands are recommended within the Scoped EIS to ensure the long term protection of natural heritage features on site (see Figure 4 of **Appendix C**), as well as the installation of native tree and shrub enhancement plantings along other woodland and wetland edges within the subject lands to mitigate any future impacts from recreational use of the subject lands. These recommendations can be addressed through a future Site Plan Amendment application. In this regard, the Greenlands System and Environmental Impact Assessment policies of the County of Official Plan have been satisfied.

Policy 5.6.7 states that where more detailed mapping is available, minor adjustments to schedules may be made without an amendment to the Official Plan and that the land use policies of the adjacent land use designation will apply as determined by Council. The recommended adjustments to the Natural Environment Zone and Environmental Protection Overlay are addressed through the proposed Zoning By-law Amendment.

5.3.3 Greenbelt Protected Countryside and Natural Heritage System

The subject lands are also designated Greenbelt Protected Countryside, while the northeastern portion of the subject lands are also subject to the Natural System overlay. The majority of the subject lands are located within the rural area of the Protected Countryside given their Recreational Area designation in the County Official Plan. In this regard, the existing Emerald Lake operation is permitted under the Greenbelt Protected Countryside policies of the County Official Plan.

Policies 9.9.5 and 9.9.6 apply to the Natural Heritage System of the Greenbelt Protected Countryside and, in part, provide policy direction with respect to development and site alteration within the Natural Heritage System. The purpose of the Zoning By-law Amendment is to recognize the existing Emerald Lake operation - no new development is proposed. Furthermore, the historic development of the subject lands with respect to existing natural features was evaluated through the aforementioned Scoped EIS which determined that site development within the northern portion of the subject lands was complete prior to the in-effect date of the Greenbelt Plan, and the northeastern corner of the southern portion of the subject lands within the Natural Heritage System was cleared to the property limits and grading underway. In this regard, uses within the Natural Heritage System were existing and therefore policies 9.9.5 and 9.9.6 should not apply.

Section 9.9.8 outlines the policy framework applicable to non-agricultural uses in the rural areas of the Protected Countryside. The existing Emerald Lake operation and proposed Zoning By-law Amendment conforms with these policies as follows:

- Emerald Lake has been operating on the subject lands for a number of decades and is appropriate for its current location in a rural area due to the nature and seasonality of the operation;

- Existing private communal on-site water and sewage systems are sufficient to support the existing operation, recognizing some regulatory permits require updating;
- The existing sewage system has no observed or expected adverse impact on the groundwater quality at the downgradient property boundary; and
- A Scoped EIS determined that the development of Emerald Lake has not resulted in negative impacts to existing natural heritage features, with the recommended establishment of new buffers adjacent to certain features in the southern portion of the site.

The existing on-site sewage treatment system is operated under an existing ECA and supports an existing recreation use that is permitted within the Greenbelt; therefore it conforms to Policy 9.9.9.1 a). Furthermore, the existing system does not occupy portions of the Greenbelt Natural Heritage System and is limited to the portions of the lands designated for Recreational Area purposes.

Lastly, Policy 9.9.11 a) permits existing uses lawfully established before December 14, 2004, being the day before the Greenbelt Plan came into force and effect. As demonstrated in this Report and the Scoped EIS, the volleyball courts located in the northern end of the subject lands, existed prior to the in-effect date of the Greenbelt Plan and were permitted by the site-specific zoning on the subject lands. In this regard, the volleyball courts are existing uses under Policy 9.9.11 a) and as such are permitted in their current location, notwithstanding the application of the Greenbelt Plan Natural Heritage System overlay.

5.3.4 Servicing

Private communal services are permitted in recreational developments subject to the recommendations of a Servicing Options Assessment per Policy 11.2.6 (Rural System Servicing). The existing sewage system is regulated under the existing ECA and therefore remains the purview of the MECP. Two of the three water supply systems within Emerald Lake are managed under directives of the public health unit. The remaining water supply system not currently managed by a public health unit directive, only services Emerald Hall. In accordance with the conclusions of the Functional Servicing Report, a public health unit directive is required for future operation of the system.

Given the water supply and sewage treatment systems already exist, a Servicing Options assessment is not required, and the private communal systems are otherwise permitted under the County Official Plan, while recognizing the following:

- the existing ECA requires a technical amendment to reflect current operating conditions and ensure compliance with the description of the works contained therein;
- and the future operation of one of the three existing water supply systems requires a public health directive.

5.3.5 Consent Application for Lot Line Adjustment

The proposed Consent (lot line adjustment) involves adding approximately 0.19 ha of lands from the Emerald Lake lands to 7260 Gore, which is designated Secondary Agriculture in the County Official Plan. Policy 10.4.6 of the County Official Plan speaks to lot line adjustments in Secondary Agricultural Areas,

which are permitted where no adverse effect on agriculture will occur. As neither parcel is used for agricultural purposes, the proposed lot line adjustment will not have an adverse effect on agriculture. The proposed adjustment will bring the undersized residential lot into compliance with the Reduced Agricultural Lot Requirements of the Agricultural Zone.

5.3.6 County of Wellington Official Plan Summary

Existing uses within the Emerald Lake Resort campground and waterpark are permitted in the policy framework of the Recreational Areas designation. Furthermore, the campground generally conforms to the Tent and Trailer Park criteria contained in the County Official Plan, with the future Site Plan Amendment process providing the opportunity to ensure the current design of the campground meets Township standards related to emergency access, internal road alignment, and other related matters. The developed areas of Emerald Lake within the Greenbelt Natural Heritage System existed and were permitted by the Township Zoning By-law prior to the in-effect date of the Greenbelt Plan and the purpose of the proposed Zoning By-law Amendment is to recognize the existing development and bring it into compliance with the Zoning By-law.

The Recreational Areas policies do not prescribe a maximum density or number of sites within tent or trailer parks established in the designation. The existing private water supply and wastewater treatment systems within Emerald Lake are adequate to service the 272 sites, recognizing that there are required amendments to, and issuance of new, permits related to these systems under relevant legislation outside of the *Planning Act*.

The development of Emerald Lake has been determined to not have resulted in negative impacts to existing natural heritage features, and buffers and enhancement plantings have been recommended through the Scoped EIS that can be implemented through the future Site Plan Amendment application.

Rezoning 0.19 ha of the subject lands to the Agricultural Zone category to facilitate the proposed lot line adjustment for 7260 Gore is not discouraged by the Official Plan policy framework, whereas the lot line adjustment is permitted by the policy framework.

In our opinion, the proposed Zoning By-law Amendment and Lot Line Adjustment applications conform to the County of Wellington Official Plan.

5.4 Township of Puslinch Zoning By-law 023/18

The subject lands are zoned *Resort Commercial (RC)* with site-specific special provisions applying to the portion of the lands both north (RCsp47) and south (RCsp43) of the rail line in the Township of Puslinch Zoning By-law 023-18 as shown in **Figure 9**. Existing natural features on the subject lands are zoned *Natural Environment (NE)*, and are also subject to the Environmental Protection overlay. The Environmental Protection overlay also applies to small areas of the subject lands zoned for resort commercial purposes.

The Zoning By-law Amendment is intended to recognize the existing Emerald Lake use, implement the recommendations of the Scoped EIS, and facilitate the proposed lot line adjustment between the subject lands and 7260 Gore. The proposed Amendment is illustrated in **Figure 11** and involves:

- Amending sp47 to:
 - permit a 'private park' as an additional permitted use;
 - remove the following existing additional permitted uses (as they are covered by the definition of 'private park'):
 - day picnicking
 - concession stand with food sales
 - pools, waterslides, and water activities
 - mini golf
 - volleyball courts
 - horseshoe pits
 - picnic shelters
 - playgrounds; and
 - establish a new site specific special provision that:
 - clarifies the additional uses that may be permitted within a private park; and
 - excludes campground uses and golf courses from a private park.
- Amending sp43 to:
 - permit a 'private park', 'assembly hall', and cabins as 'short term accommodations' as additional permitted uses;
 - remove the following existing additional permitted uses:
 - concession stand for food sales
 - picnic shelters
 - variety store
 - laundromat
 - baseball diamonds
 - washrooms; and
 - establish new site specific special provisions that:
 - permit a maximum of 272 recreational vehicle sites within a travel trailer park;
 - allow 23 of the permitted recreational vehicle sites to be used for tent camping purposes;
 - permit a maximum of 21 cabins on permitted recreational vehicle sites, to be used as short term accommodations;

- allow a fitness room, indoor swimming pool and hot tub within an assembly hall use; and
 - establish a laundromat, washrooms, shower facilities and office as accessory uses to a travel trailer park.
- Rezoning the portion of the subject lands to be added to 7260 Gore through the proposed Consent – Lot Line Adjustment from the Special Provision Resort Commercial (RC[sp43]) Zone to the Agricultural (A) Zone category; and
 - Revising the limits of the Natural Environment (NE) Zone and Environmental Protection (EP) Overlay as they apply to the southern portion of the lands.

The proposed limits of the NE and EP Overlay as illustrated in **Figure 11** have yet to be confirmed in the field and have been delineated by Aboud & Associates based on their work and findings through the Scoped EIS. Wetland limits, edge of bank associated with the existing watercourse, edge of the existing pond and dripline associated with the woodland in the southern portion of the subject lands will be surveyed in the short term and these boundaries will inform the finalization of the Zoning By-law Amendment.

The draft Zoning By-law Amendment is enclosed as **Appendix A** and above-noted site-specific provisions are assessed below.

Emerald Lake

Permitted Uses – sp47 (Waterpark)

Currently sp47 lists a number of individual recreational activities and facilities as permitted additional uses (i.e. day picnicking, volleyball courts, picnic shelters), which were established in the former Zoning By-law (19/85). The 2018 Zoning By-law contains use definitions that more aptly capture the existing facilities and activities in the waterpark area associated with Emerald Lake negating the need to list individual uses within the special provision.

A 'private park' is defined in the Zoning By-law as: *a park, other than a public park, operated on a commercial and/or private member basis, and which includes one or more recreational uses, such as campgrounds, golf courses, swimming pools, tennis courts, bowling greens, arena, boating facilities, sports fields, a picnic area, and ancillary retail uses.* This definition is appropriate to describe the waterpark component of Emerald Lake.

A 'public park' is listed as permitted use in the RC Zone category, whereas a 'private park' is not. The 'public' and 'private' park definitions of the Zoning By-law are similar in nature, with the main difference being the characterization of the entity owning, operating and maintaining the park (being under the jurisdiction of a public authority, or privately owned and operated on a commercial basis). In our opinion, permitting a private park maintains the intent of the RC Zone category, which provides for and regulates commercial recreational uses.

The proposed site-specific special provision seeks to include additional uses that are consistent with a private park and that already occur on the subject lands, including, waterslides, splash pads, and waterparks; sport courts used for recreational purposes and tournaments; and horseshoe pits. The definition of private park also includes campgrounds and golf courses, however since these uses do not exist and are not contemplated on the north portion of the site, they are proposed to be excluded from the permitted uses.

Aside from the uses discussed above, the existing sp47 provision also permits a concession stand with food sales, whereas the waterpark also contains a rental and souvenir shop. The RC Zone category permits an accessory restaurant use, and the private park definition includes ancillary retail uses.

In this regard, the proposed amendments to sp47 appropriately characterize and permit the existing waterpark operation and facilities.

Permitted Uses – sp43 (Trailer Park)

Similar to the waterpark, the 'private park' definition of the Zoning By-law adequately captures the recreational facilities and open spaces associated with the Emerald Lake trailer park. Travel trailer parks are a permitted use in the RC Zone category.

As the purpose of the application is to recognize existing uses, the Zoning By-law Amendment also includes a new site-specific special provision to permit a maximum of 272 recreational vehicle sites within a travel trailer park.

As discussed in Section 3 of this Report, a recreation centre exists within the trailer park and serves as an amenity to guests and seasonal campers of Emerald Lake, supporting campground events and theme nights, and accommodating fitness-related facilities. The recreation centre is also offered for private events during the operating season. The recreation hall as a use is not adequately captured by the permitted use definitions in the RC Zone category, despite being an accessory and complementary use to the Emerald Lake operation. Through a review of the permitted use definitions in the Zoning By-law, it is apparent that the 'assembly hall' definition best describes the recreation centre as it currently functions: *any premises used for the **gathering of persons** for civic, political, travel, religious, **social**, educational, **recreational**, or similar purposes, and may include the preparation, serving, and consumption of food and beverages.*

As reviewed in Section 5.3.1 of this Report, the recreation centre is permitted in the Recreational Areas designation as a 'commercial activity related to servicing recreational activities', considering its primary function as a facility serving as an amenity within the trailer park. A site-specific special provision is included in the proposed Amendment to clarify the assembly hall use is permitted as an accessory use to a travel trailer park and recognize existing facilities within the recreation centre (i.e. fitness room) outside of the Zoning By-law use definition.

Tent Camping and Cabins – sp43 (Trailer Park)

The travel trailer park definition does not include tent camping sites, nor does it adequately capture the existing (non-permanent) cabin sites within Emerald Lake. Tent and trailer camping (Tent and Trailer Park) is a permitted use in the Recreational Areas designation, subject to a set of criteria outlined in the County Official Plan. As demonstrated in Section 5.3.1 of this Report, Emerald Lake meets this criteria. 23 sites within the trailer park accommodate either pop-up tent trailers (a permitted accommodation in the travel trailer park use definition) or tent camping. Given the use permissions of the Recreational Areas designation, tent camping is permitted on the subject lands despite being currently prohibited by the sp43 provision of the Zoning By-law. The proposed Amendment includes a site-specific special provision allowing 23 of the maximum permitted 272 recreational vehicle sites within the travel trailer park to be used for tent camping.

The 21 cabins within Emerald Lake are not adequately captured by the recreational vehicle definition of the Zoning By-law. The cabins are not permanent structures, and as such can be moved to different sites within the trailer park if desired. Based on our review of the definitions in the Zoning By-law, it

appears that the 'short term accommodation' definition, while imperfect, appropriately describes the cabin rentals within Emerald Lake: *use of a building or structure or any part thereof that operates or offers a place of temporary residence, lodging or occupancy by way of concession, permit, lease, license, rental agreement, or similar commercial arrangement for any period less than thirty (30) consecutive calendar days, throughout all or any part of a calendar year. Short term accommodation uses shall not mean or include a motel, hotel, bed and breakfast establishment, hospital, or similar commercial or institutional use.*

A site-specific special provision is included in the proposed Amendment to limit the number of cabin (sites) permitted in a travel trailer park to 21, recognizing the number of existing cabins within Emerald Lake.

Agricultural (A) Zone for Lot Line Adjustment

The 0.19 ha of lands to be added to 7260 Gore is currently zoned Resort Commercial. The Zoning By-law Amendment also includes an amendment to this small portion of the site to zone the proposed severed lands Agricultural (A), consistent with the benefitting lands (7260 Gore) The following is a review of 7260 Gore with respect to Table 11.3 both as the lot currently exists and after the proposed lot line adjustment.

Standard	Required	Existing	After Lot Line Adjustment
Lot Area (minimum)	0.4 ha	0.35 ha	0.54 ha
Lot Frontage (minimum)	25 m	+45 m	+50 m
Front Yard (minimum)	7.5 m	+55 m	+55 m
Interior Side Yard (minimum)	3 m	+8 m	+12 m
Rear Yard (minimum)	7.5 m	+13 m	+30 m
Lot Coverage (maximum)	30%	+ 9%	+ 7%

With the proposed lot line adjustment and rezoning of the lands included in the lot addition, 7260 Gore will comply with the Agricultural Zone.

Natural Environment (NE) Zone Limits – Southern Portion of Subject Lands.

The Scoped EIS has determined that the area immediately west of the small pond includes lands composed of bedrock and does not natural contain heritage features. To address the findings and recommendations of the EIS, the Zoning By-law Amendment proposes a revision to the NE Zone boundary on the southern portion of the subject lands.

Seasonal recreational vehicle sites exist proximate to the revised NE Zone boundary, as well as components of the on-site servicing infrastructure sanitary sewer line). Subsection 4.31 a. of the Zoning By-law requires buildings, structures, and private sewage treatment systems to be setback 30 metres from the limit of the NE Zone. Subsection 4.31 c. allows reductions in this setback subject to approval/support from the Conservation Authority having jurisdiction (being the Hamilton Conservation Authority). Existing trailer sites proximate to the NE Zone have been established for over 20 years and do not include buildings. The existing sewage treatment system is regulated by an ECA issued by the MECP. The Scoped EIS has concluded that the development of Emerald Lake has not resulted in negative impacts to natural heritage features. In our opinion, it is appropriate to revise the boundary of the NE zone and the 30 metre setback.

Environmental Protection (EP) Overlay – Southern Portion of Subject Lands.

The EP Overlay as it applies to the southern portion of the subject lands is proposed to be revised adjacent to the existing pond, expanded in the southwest area of the site and added in the southeast corner consistent with the conclusions of the Scoped EIS. It is acknowledged that the revised EP Overlay limit includes portions of some existing pop-up tent trailer/tent camping sites in the southwest corner of the subject lands, and the rear of some seasonal trailer sites in the southwest area of the subject lands. The EP Overlay in these areas is intended to recognize existing treed area that, while not anticipated to meet the criteria for identification of a significant woodlands, are recommended for inclusion in the Overlay to prevent any encroach or reduction in these treed areas.

In summary, the proposed Zoning By-law Amendment establishes regulations to recognize the existing facilities and operations of Emerald Lake and implement the recommendations of the Scoped EIS. The proposed Zoning By-law Amendment also facilitates the proposed lot line adjustment and ensures that 7260 Gore, after the lot addition, will comply with the Agricultural (A) Zone.

6.0 Summary and Conclusions

MHBC has prepared this Planning Justification Report in support of the Zoning By-law Amendment and Consent (Lot Line Adjustment) applications. The Zoning Bylaw Amendment application proposes to recognize the existing Emerald Lake development with appropriate new uses and regulations and facilitate the lot addition to 7260 Gore Road to increase its lot area, consistent with the By-law requirement. Based on the analysis contained in this Planning Justification Report, and together with the supporting technical reports, it is our opinion that the proposed applications are appropriate and represent good planning for the following reasons:

1. The applications are consistent with the Provincial Planning Statement, 2024;
2. The applications conform to the Greenbelt Plan, 2017;
3. The applications conform to the County of Wellington Official Plan;
4. The development of Emerald Lake over time has not resulted in negative impacts to existing natural heritage features,
5. Existing recreational facilities located within the Greenbelt Natural Heritage System were established prior to the in-effect date of the Greenbelt Plan;
6. The existing private water supply and wastewater treatment systems within Emerald Lake are adequate to service the existing 272 sites, with required amendments to the existing Environmental Compliance Approval issued by the Ministry of the Environment, Conservation and Parks, and issuance of permits related to components of the water supply system;
7. Emerald Lake is a long, well-established recreation destination within the Township of Puslinch and is a significant seasonal employer; and
8. The future Site Plan Amendment process provides an opportunity to implement recommendations of the Scoped Environmental Assessment related to buffer and enhancement plantings within the subject lands.

Respectfully submitted,

MHBC

Trevor Hawkins, MPI, MCIP, RPP
Partner

Jennifer Gaudet, BES, MCIP, RPP
Associate

Meghan Lippert, MAES
Planner

A

Appendix A: Draft Zoning By-law Amendment

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER _____

A BY-LAW TO AMEND BY-LAW NUMBER 023/18, AS AMENDED, BEING THE ZONING BY-LAW OF THE TOWNSHIP OF PUSLINCH

WHEREAS, the Council of the Corporation of the Township of Puslinch deem it appropriate and in the public interest to amend By-Law Number 023/18 pursuant to Section 34 of the Planning Act, R.S.O. 1990 as amended;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF PUSLINCH ENACTS AS FOLLOWS:

1. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from a Special Provision Resort Commercial (RC(sp43)) ZONE to the **Agricultural (A)** ZONE, as shown on Schedule "A" of this By-Law.
2. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from a Special Provision Resort Commercial (RC(sp43)) ZONE to the **Agricultural (A)** ZONE and **Environmental Protection (EP)** OVERLAY, as shown on Schedule "A" of this By-Law.
3. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Natural Environment (NE) ZONE to the **Special Provision Resort Commercial (RC(sp43))** ZONE, as shown on Schedule "A" of this By-Law.
4. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Natural Environment (NE) ZONE and Environmental Protection (EP) OVERLAY to the **Special Provision Resort Commercial (RC(sp43))** ZONE, as shown on Schedule "A" of this By-Law.
5. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Natural Environment (NE) ZONE and Environmental Protection (EP) OVERLAY to the **Special Provision Resort Commercial (RC(sp43))** ZONE and Environmental Protection (EP) OVERLAY, as shown on Schedule "A" of this By-Law.
6. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Special Provision Resort Commercial (RC(sp43)) ZONE to the **Natural Environment (NE)** ZONE and **Environmental Protection (EP)** OVERLAY, as shown on Schedule "A" of this By-Law.
7. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Special Provision Resort Commercial (RC(sp43)) ZONE to the **Special Provision Resort Commercial (RC(sp43))** ZONE and **Environmental Protection (EP)** OVERLAY, as shown on Schedule "A" of this By-Law.
8. That Schedule "A" of By-law 023/18 is hereby amended by rezoning a portion of the lands municipally referred to as 7248 Gore Road, from the Special Provision Resort Commercial (RC(sp43)) ZONE and Environmental Protection (EP) OVERLAY to the **Special Provision**

Resort Commercial (RC(sp43)) ZONE, as shown on Schedule “A” of this By-Law.

9. That Section 14 Site-Specific Special Provisions is amended by modifying site specific provision 43 and as follows:

No.	Parent Zone	Additional Permitted Uses	Prohibited Uses	Site Specific Special Provision
43	RC	Private Park Assembly Hall Cabins as Short Term Accommodation Concession stand for food sales Picnic Shelters Variety Store Laundromat Baseball Diamonds Washrooms	N/A	A maximum of 272 recreational vehicle sites are permitted within a travel trailer park, of which 23 sites may be used at any time for tent camping purposes. A maximum of 21 cabins are permitted within a travel trailer park as a short term accommodation. An Assembly Hall may also include a fitness room, indoor swimming pool and hot tub is also permitted as an accessory use within a travel trailer park. Accessory uses associated with a travel trailer park may also include a laundromat, washrooms, and shower facilities.

10. That Section 14 Site-Specific Special Provisions is amended by modifying site specific provision 47 as follows:

No.	Parent Zone	Additional Permitted Uses	Prohibited Uses	Site Specific Special Provision
47	RC	Private Park Day Picnicking Concession Stand with food sales Pools, Waterslides and Water activities	N/A	A private park may also include waterslides, splash pads and waterparks; sport courts used for both

No.	Parent Zone	Additional Permitted Uses	Prohibited Uses	Site Specific Special Provision
		Mini Golf Volleyball Courts Horseshoe Pits Picnic Shelters Playgrounds		recreational purposes and tournaments; and horseshoe pits, but shall not include campgrounds or golf courses.

11. That the subject land as shown on Schedule “A” to this By-Law shall be subject to all applicable regulations of Zoning By-law 023/18, as amended

12. This By-law shall become effective from the date of passage by Council and come into force in accordance with the requirements of the Planning Act, R.S.O. 1990, as amended.

READ A FIRST AND SECOND TIME THIS _____ OF _____, 2026

MAYOR

CLERK

READ A THIRD TIME AND PASSED THIS _____ OF _____, 2026

MAYOR

CLERK

B

Appendix B: Chronology Supporting Documents

1983 DEVELOPMENT AGREEMENT

394748

Amendment.

THIS AGREEMENT made in duplicate this 28th
day of Sept., 1983.
BETWEEN:

STANLEY HASNAS and DRAGUTIN HASNAS,
both of the City of Hamilton, in the Regional
Municipality of Hamilton-Wentworth,

hereinafter called the "OWNERS",

OF THE FIRST PART;

-and-

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH,

hereinafter called the "TOWNSHIP",

OF THE SECOND PART;

-and-

ISOBEL HASNAS,
spouse of Dragutin Hasnas,

OF THE THIRD PART;

-and-

EMERALD LAKE FARMS LIMITED and
THE CANADIAN IMPERIAL BANK OF COMMERCE,

hereinafter called the "MORTGAGEES",

OF THE SECOND PART;

WHEREAS the Owners are the registered owners
in fee simple of the lands described in Schedule "A" attached hereto
and forming part of this agreement together with the Plan being also
part of Schedule "A".

AND WHEREAS the Owner has obtained approval
to develop camp sites for recreational vehicles for use on a
seasonal basis on that part of the South Half of Lot 29, in the
Gore Concession of the Township of Puslinch lying Southeast of the
lands of the Canadian Pacific Railway to the extent as indicated
on Schedule "B" attached hereto and forming part of this Agreement.

WITNESSETH that in consideration of the mutual
covenants herein, the Parties agree as follows:-

1. The Owners agree that not more than 200 trailers and/or recreational
vehicle camp sites shall be permitted on the lands illustrated on the
plan forming part of Schedule "A" to this Agreement. All such camp
sites (200) shall be south of the C.P.R. line and within the limits
of Parcel 1 as shown on the Plan being part of Schedule "A" to this
Agreement. The Owners agree that no application will be made
in the future to increase the number of sites.

2. No tent sites shall be developed nor shall any of the Owners' lands

and sites shall be located and built in accordance with the site Plan attached hereto and marked Schedule "B" to this Agreement. The phasing of the construction shall also be in strict accordance with Schedule "B" to this Agreement.

5. The Owners acknowledge that the amendment to the Official Plan was from "Rural" to "Seasonal Recreation" and agree that campers will be permitted to use the said land and facilities from May 1st through to October 30th in any year. The lands and facilities will be closed by the Owners at midnight on October 30th in each year and shall not be re-opened until May 1st the following year. Further the Owners agree that all water and hydro facilities will be disconnected and shut off during the closed period that is from October 30th through to May 1st.

6. The said property shall also have limited seasonal use for day users, i.e. it shall only be open for day users from May 15th to the end of the Labour Day Weekend in each year. Day Users shall not be permitted on the said property from the first Tuesday after the end of the Labour Day Weekend until May 15th the following year.

7. The Owners agree to install and maintain a gate at the entrance to the said property and the gate shall not be opened to allow access until 9:00 a.m. and shall be closed at 8:00 p.m. in order to prohibit access to day users. Persons occupying the camp sites shall be allowed entrance to the property until 11:00 p.m. after which time they will not be allowed to enter the said property.

8. The Owners shall not own any trailers on the property nor will they lease, sub-lease or rent any trailer to any person or act as an agent for the purpose of renting or leasing trailers on the property.

9. The Owners shall provide toilet facilities in the designated area north of the C.P.R. tracks, i.e. on Parcel 2 as set out on the Plan forming part of Schedule "A". The day users will not be permitted to use the washroom facilities located on Parcel 1 shown in Schedule "A".

10. Alcoholic beverages may only be consumed in the immediate area of the trailer and the Owners will not permit alcoholic beverages to be consumed in the area north of the C.P.R. tracks.

11. It is agreed that noise will be kept within reasonable levels. There will be no loud music, shouting, singing or radio after 9:00 p.m.

Noise By-law now deals with this

12. The Owners shall prohibit dogs owned by people using the grounds from roaming unattended either within the property limits or outside the said limits.

13. No trailer site will be constructed or used within 300 feet of the most westerly limit of the brick house situate on the White property which is located on part of Lot 29, Gore Concession.

14. All camp fires shall be contained within a stone pit. No ground fires of any description shall be permitted on the property lying to the North of the C.P.R. tracks.

15. The Owners agree to erect a 5 foot high fence around the entire boundary of this property.

16. The Owners shall duly observe the portion of the property designated as hazard lands and will not permit or allow any activity of any nature

18. The Parties of the Third Part executes this Agreement in accordance with the provisions of the Family Law Reform Act.

19. The Parties of the Fourth Part hereby, being registered mortgagees, postpone any rights which they have under their mortgage and consent that their said mortgages shall be subject to the terms and conditions of this Agreement.

20. This Agreement shall be binding on the Parties and their heirs, successors or assigns and shall be registered on the title to the said lands and it is the intention of the parties that the contents herein shall be covenants and restrictions running with the said lands.

IN WITNESS WHEREOF the said Parties hereto have hereunto set their hands and seals.

[REDACTED]
Stanley Hasnas

[REDACTED]
Isobel Hasnas

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

PER: [REDACTED]
Reeve

[REDACTED]
Clerk

[REDACTED]
Isobel Hasnas

EMERALD LAKE FARMS LIMITED

PER: [REDACTED]

CANADIAN IMPERIAL BANK OF COMMERCE

PER: [REDACTED]



Power of Attorney registered
as #215051 on April 5, 1979

[REDACTED]



Delete the
inappropriate.

FORM 19a/~~FORM 21a~~
REGISTRY ACT/~~LAND TITLES ACT~~

AFFIDAVIT AS TO POWER OF ATTORNEY

We, J. Del Cook
of the Town of Ancaster
in the Province of Ontario
and G. Dell Kindy
of the City of Burlington
in the Province of Ontario
MAKE OATH AND SAY:

Delete
"Registry"
or "Land
Titles" as
appropriate.

1. We are the attorneys for Canadian Imperial Bank of Commerce under
power of attorney dated March 20, 1979 and registered as No. 215051
on April 5, 1979 in the Land Registry Office for the Registry/
~~Land Titles~~ Division of ~~Wentworth No. 62~~ Wellington South No. 61.
2. The power of attorney is in full force and effect and has not been revoked.

SWORN before me

at the City of Hamilton
in the Province of Ontario
this 16th day of

Assistant General Manager

Superintendent

A Commissioner, etc.

Marilyn Lang, a Commissioner, etc.
Judicial District of Hamilton-Wentworth
for Canadian Imperial Bank of Commerce.

To be completed and attached to
each document in the Province of
Ontario

AFFIDAVIT OF SUBSCRIBING WITNESS

(to be attached to documents
executed pursuant to the General
Power of Attorney)

I, Harvey W. Kingston, of the City of Hamilton,
in the Province of Ontario,

MAKE OATH AND SAY:

I am a subscribing witness to the attached Instrument and I was present and saw
it executed at Hamilton, Ontario by

J. Del Cook

and

G. Dell Kindy

I verily believe that the persons whose signature I witnessed were authorized
to execute the instrument as attorneys for Canadian Imperial Bank of Commerce.

I know the said persons and they are, and at the time of the execution of the
instrument were Assistant General Manager

and Superintendent, respectively, of the Canadian Imperial Bank
of Commerce.

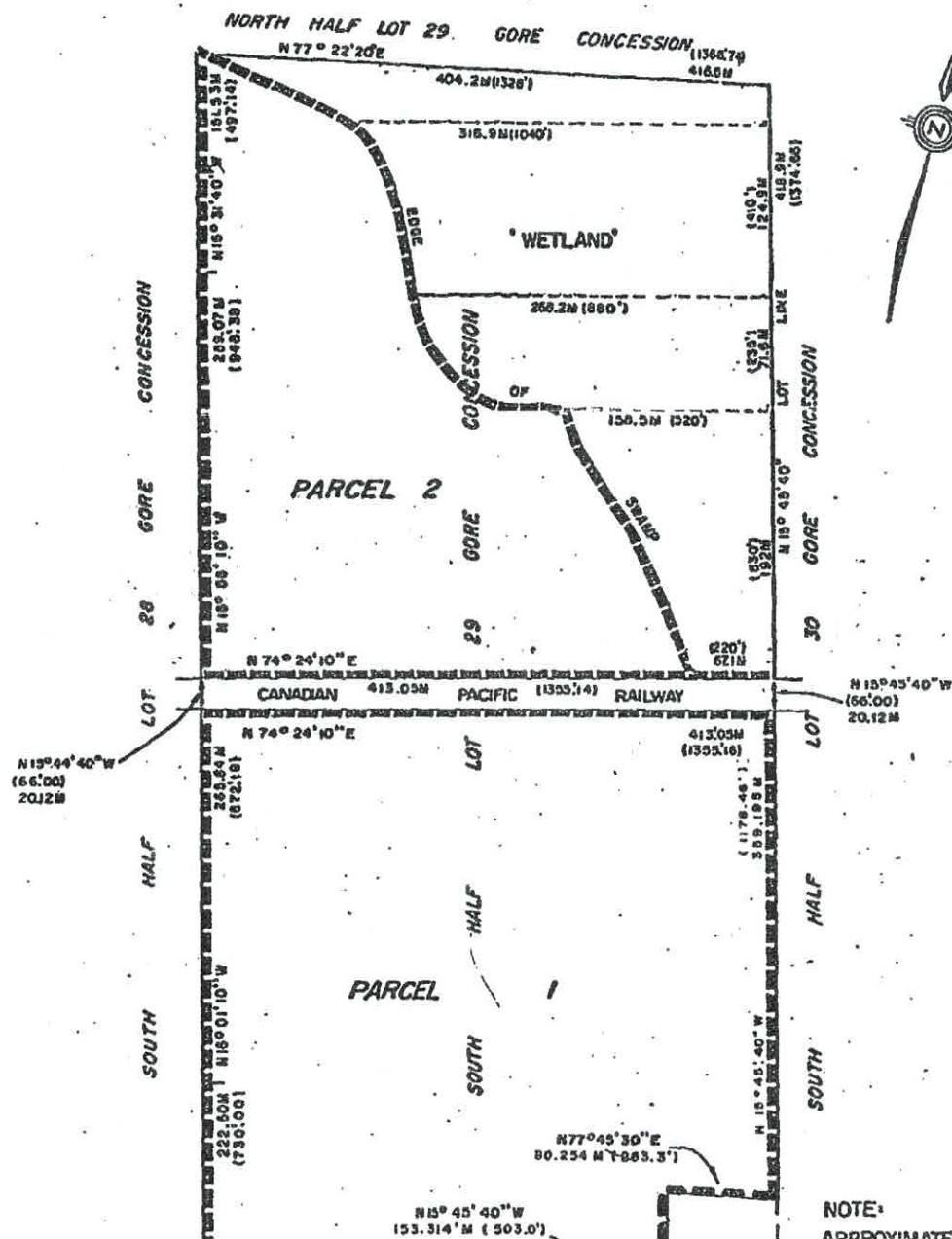
I am an officer of Canadian Imperial Bank of Commerce, Hamilton, Ontario and as
such, have personal knowledge of the matters deposed to herein.

SWORN before me at the City
of Hamilton, in the Province
Ontario this 16th day of

[Redacted]
[Redacted]
[Redacted]

Marilyn Lang, a Commissioner, etc.

SCHEDULE "A"
PART OF SOUTH HALF LOT 29,
GORE CONCESSION
TOWNSHIP OF PUSLINCH



SCHEDULE "A" cont'd.

ALL AND SINGULAR that certain parcel or tract of land and premises situate, lying and being in the Township of Puslinch, in the County of Wellington and Province of Ontario:-

FIRSTLY - Being composed of Part of the South Half of Lot 29, in the Gore Concession of the Township of Puslinch containing an area of 47.972 acres more or less and which said parcel or tract of land and premises is more particularly described as follows:-

PREMISING the bearings herein are astronomic and are derived from Plan 61R-267;

COMMENCING at an iron bar at the Southwesterly angle of the South Half of Lot 29;

THENCE North 77 degrees 43 minutes 50 seconds East along the Southerly limit of the said Half Lot 441.91 feet to an iron bar at an angle therein;

THENCE North 77 degrees 45 minutes 30 seconds East continuing along the Southerly limit of the said Half Lot 653.0 feet to an iron bar therein distant 263.3 feet Westerly from the Southeasterly angle thereof;

THENCE North 15 degrees 45 minutes 40 seconds West 503.0 feet to an iron bar;

THENCE North 77 degrees 45 minutes 30 seconds East 263.3 feet to an iron bar in the Easterly limit of the said Half Lot;

THENCE North 15 degrees 45 minutes 40 seconds West along the Easterly limit of the said Half Lot 1178.46 feet to an iron bar in the Southerly limit of the lands of the Canadian Pacific Railway;

THENCE South 74 degrees 24 minutes 10 seconds West along the Southerly limit of the lands of the Canadian National Railway 1355.16 feet to an iron bar in the Westerly limit of the said Half Lot;

THENCE South 15 degrees 24 minutes 40 seconds East continuing along the Westerly limit of the said Half Lot 730.0 feet to the point of commencement.

SECONDLY - Being composed of Part of the South Half of Lot 29, in Gore Concession of the Township of Puslinch containing an area of 43.961 acres more or less and which said parcel or tract of land and premises is more particularly described as follows:-

PREMISING the bearings herein are astronomic and are derived from Plan 61R-267;

COMMENCING at an iron bar in the Easterly limit of the said Half Lot distant 1747.46 feet measured Northerly therealong from the Southeasterly angle thereof;

THENCE South 74 degrees 24 minutes 10 seconds West along the Northerly limit of the lands of the Canadian Pacific Railway 1355.14 feet to an iron bar in the Westerly limit of the said Half Lot;

THENCE North 15 degrees 56 minutes 10 seconds West along the Westerly limit of the said Half Lot 948.38 feet to an iron bar at an angle therein;

THENCE North 16 degrees 31 minutes 40 seconds West continuing along the Westerly limit of the said Half Lot 497.14 feet to an iron bar;

THENCE North 77 degrees 22 minutes 20 seconds East along a post and wire fence marking the Northerly limit of the said Half Lot and its production thereof 1366.74 feet to an iron bar at the Northeasterly angle of the said Half Lot;

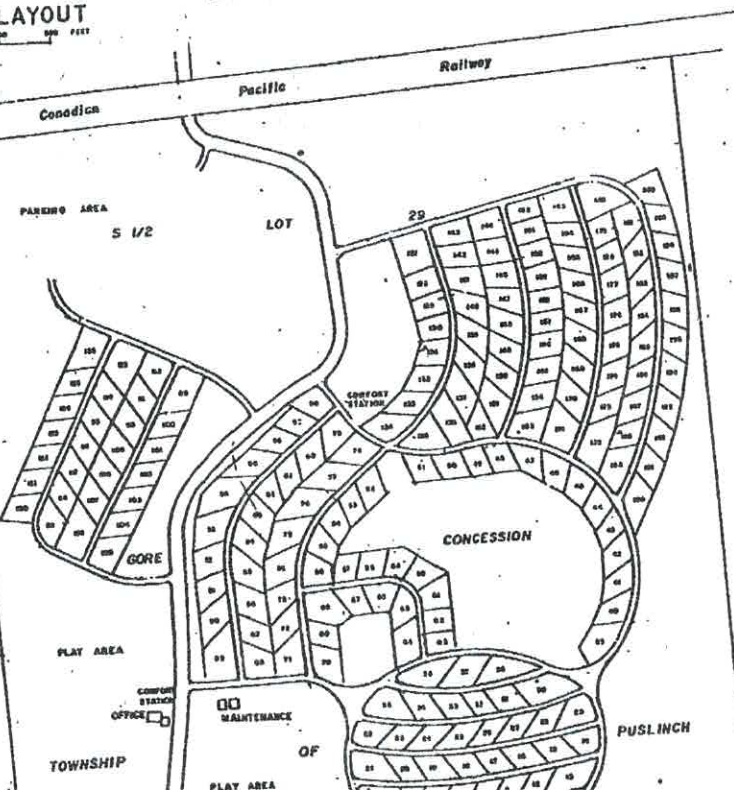
THENCE South 15 degrees 45 minutes 40 seconds East along the Easterly limit of the said Half Lot 1374.66 feet to the point of

SITE PLAN FOR CAMPSITE LAYOUT

RECREATIONAL AREA
SWIMMING, PICNICKING, ETC.

SCHEDULE B

1 2 3 4 5 6 7 8 9 10 FEET



PHASING OF EMERALD LAKE CAMPSITE

PHASE 1

Will comprise of sites 43 to 51 both inclusive, 127 to 200 both inclusive, (83 sites).

Develop sites and roadways to meet market demand.

Comfort station (between sites 51 and 52) will be provided (portable initially). This comfort station eventually will be a free standing building containing showers and toilets.

Well water during this phase will be available from existing two sites - Well No. 1 and Well No. 2.

New well will be drilled in general area as shown.

Two additional comfort stations will be provided as development dictates in general area of site 200 and site 190.

Sites in this phase to be provided with hydro and water hook-ups. Dump station is to be established with water service.

PHASE 2

Will comprise of sites 99 to 120 (28 sites).

Develop sites and roadways to meet market demand.

Comfort stations will be provided in the general area of site 106 and site 112,

Sites in this phase to be provided with hydro and water hook-ups.

PHASE 3

Will comprise of sites 52 to 98 both inclusive (47 sites).

Develop sites and roadways to meet market demand.

Comfort station will be provided in the general area of site 70.

Sites in this phase will be provided with hydro and water hook-ups.

PHASE 4

Will comprise of sites 1 to 42 both inclusive (42 sites).

All sites in this phase will be provided with hydro and water hook-ups.

Sites 1 to 38 will have sanitary sewer connection to septic system that will be installed during this phase.

auth (No. 61)
ferred as of
in the
istrar

DATED: September 28th 1983

BETWEEN:

STANLEY HASNAS and DRAGUTIN HASNAS

- and -

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

- and -

ISOBEL HASNAS

- and -

EMERALD LAKE FARMS LIMITED and
THE CANADIAN IMPERIAL BANK OF COMMERCE

AGREEMENT

M. ELDERRY & MORRIS
Barristers and Solicitors
84 Woolwich Street
Guelph, Ontario
N1H 5M5

1994 ZONING BY-LAW AMENDMENT



Township of Puslinch

OFFICE OF CLERK AND TREASURER

R.R. 3 Guelph, Ontario N1H 6H9
(County Rd. 34, Aberfoyle)
Telephone: (519) 763-1226

(MRS.) BRENDA LAW

Affidavit under Section 34(22) of The Planning Act, R.S.O. 1990

I, Brenda Law, hereby declare that the Notice of the Passing of Zoning By-law Number 14/94 of The Corporation of the Township of Puslinch, passed by the Council of The Corporation of the Township of Puslinch on the 19th day of January, 1994 was given in the manner and in the form and to the persons and agencies prescribed by Regulation 404/83 made by the Lieutenant Governor as required by Subsection 18 of Section 34 of The Planning Act, R.S.O. 1990. I also declare that the 20 day objection period expired on Tuesday, February 22, 1994 and to this date no notice of appeal setting out the objection to the by-law and the reasons in support of the objection have been filed by any person in the office of the Clerk under Subsection 19 of Section 34 of The Planning Act, R.S.O. 1990.

Dated this 23rd Day of
February, 1994.

[REDACTED]
Brenda Law, Clerk

Re: Emerald Lake
Amends 19/85
Site Plan Control By-law 15/94

**NOTICE OF THE PASSING OF A
ZONING BY-LAW
BY THE CORPORATION OF THE
TOWNSHIP OF PUSLINCH**

TAKE NOTICE that the Council of The Corporation of the Township of Puslinch passed By-Law No. 14/94 on the 19th day of January, 1994, under Section 34 of the Planning Act, R.S.O. 1990.

AND TAKE NOTICE that any person or agency may appeal to the Ontario Municipal Board in respect of the by-law by filing with the Clerk of The Corporation of the Township of Puslinch, not later than the 22nd day of February, 1994, a notice of appeal setting out the objection to the by-law and the reasons in support of the objection.

AND TAKE NOTICE that the Ontario Municipal Board advises that the Planning Act provides for appeals to be filed by "persons". As groups or associations, such as residents or ratepayer groups which do not have incorporated status, may not be considered "persons" for the purposes of the Act, groups wishing to appeal this by-law should do so in the name or names of individual group members and not in the name of the group.

An explanation of the purpose and effect of the by-law, describing the lands to which the by-law applies, and a key map showing the location of the lands to which the by-law applies are attached.

The complete by-law is available for inspection in my office during regular office hours.

DATED at the Township of Puslinch this 2nd day of February, 1994.


BRENDA LAW, CLERK
TOWNSHIP OF PUSLINCH
R. R. #3
Guelph, Ontario
N1H 6H9

Re: Emerald Lake
Amends 19/85
Site Plan Control By-law 15/94

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER 14/94

**A BY-LAW TO AMEND BY-LAW NUMBER 19/85
BEING THE ZONING BY-LAW OF THE TOWNSHIP OF PUSLINCH**

WHEREAS the Council of the Corporation of the Township of Puslinch deems it necessary and in the public interest to amend By-law Number 19/85;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF PUSLINCH ENACTS AS FOLLOWS:

1. That subsection 14(4)(c), **C4-3 (TRAVEL TRAILER PARK)**, is amended by the addition of the following new uses to subsection (i) Uses Permitted Restricted To:

- " - concession stand for food sales;
- picnic shelters;
- variety store;
- laundromat;
- baseball diamonds;
- washrooms."

2. That subsection 14(4)(h), **C4-8 (DAY USE PICNICKING)**, is amended by the addition of the following new uses to subsection (i) Uses Permitted Restricted To:

- " - pools and water slides;
- mini golf;
- volleyball courts;
- horseshoe pits;
- picnic shelters;
- playgrounds."

3. That this By-law shall come into force and take effect upon the final passing thereof pursuant to Sections 34(21) and 34(22) of The Planning Act, R.S.O. 1990, or, where applicable, upon the approval of the Ontario Municipal Board.

READ A FIRST AND SECOND TIME THIS 19TH DAY OF JANUARY, 1994.

READ A THIRD TIME AND PASSED THIS 19TH DAY OF JANUARY, 1994.


REEVE


CLERK

SCHEDULE 2(i)
EXPLANATORY NOTE

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

EXPLANATION OF BY-LAW NO. 14/94

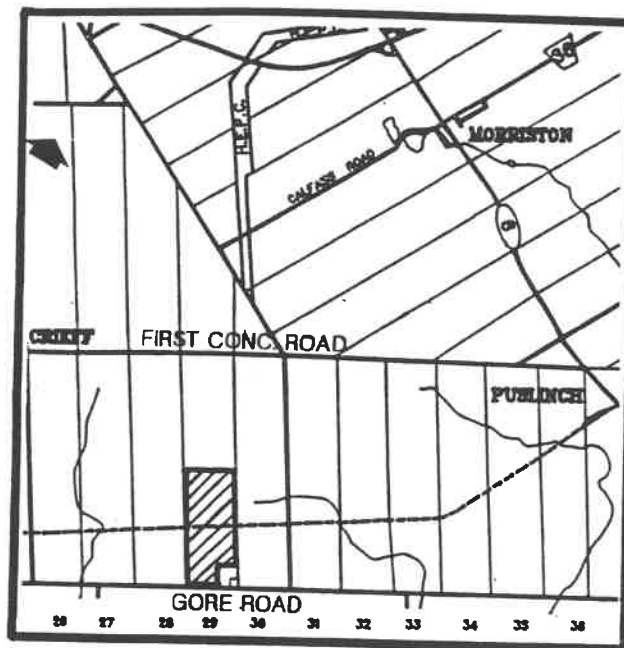
The purpose of By-law No. 14/94 is to amend the Township of Puslinch Zoning By-law 19/85 by adding various new uses to both the C4-3 and the C4-8 Zones.

This By-law relates to the property owned by Emerald Lake Recreation Park Ltd. located at Part Lot 29, Front Gore Concession (as shown below). The intent of this By-law is to only recognize recreational land uses which currently exist within the park. The changes proposed by this amendment comply with the intent of the Township of Puslinch Official Plan which designates the subject land as SEASONAL RECREATIONAL.

As a means of further regulating the uses and nature of the subject land, a Site Plan Control By-law has also been prepared for this property pursuant to the provisions of The Planning Act. A Site Plan Control By-law will allow the Township to enter into a development agreement with the land owner and to request the submission of a detailed site plan of the park.

The establishment of any new uses on this property, beyond what would be permitted by this amendment and an approved site plan, will require the subsequent review and approval by Council and may also include additional amendments to the Official Plan and Zoning By-law.

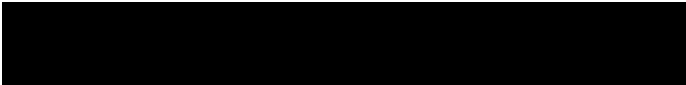
SCHEDULE 2(ii)
KEY MAP



SCHEDULE 3

I, BRENDA LAW, the Clerk of the Township of Puslinch, have reviewed By-Law Number 14/94 of the Corporation of the Township of Puslinch.

I am of the opinion that the By-Law is in conformity with the Official Plan in effect for the Township of Puslinch Planning Area.


Clerk of the Township of Puslinch

2004 AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL



Ministry
of the
Environment

Ministère
de
l'Environnement

AMENDED CERTIFICATE OF APPROVAL
MUNICIPAL AND PRIVATE SEWAGE WORKS
NUMBER 5058-5VDTJN

Ontario

Emerald Lake Inc.
7248 Gore Road, RR 2
Puslinch, Ontario
N0B 2J0

Site Location: Pt Lot 29, Gore Concession
Puslinch Township, County of Wellington

You have applied in accordance with Section 53 of the Ontario Water Resources Act for approval of:

upgrading of an existing sewage treatment and subsurface disposal works rated at 42,500 L/day, consisting of pre-treatment facilities, recirculating bio-filters, de-nitrification beds and subsurface disposal system serving an existing 200 unit seasonally occupied (May 1st to October 31st) trailer park development, located in Part of South Half, Lot 29, Gore Concession, in the Township of Puslinch, as follows:

PROPOSED FACILITIES:

- one (1) chemical (molasses carbon source) dosing system complete with supply tank, wash water facility and one (1) dosing pump rated at 0.8L/hour,
- one(1) 40,000L capacity (40cu.m.) precast concrete tank complete with baffles, vents, access hatch and all required piping works to act as an anaerobic denitrification tank,
- one (1) 4,500L capacity pumping station (tank) complete with two(2) duplex controlled submersible sewage pumps, rated at 2.0L/s at 6.3m TDH,

ABANDONED FACILITY:

- **Effluent Dividing Chamber:** one (1) chamber having overall dimensions 0.9m x 0.9m equipped with a weir arrangement, dividing effluent from the bio-filters and directing flows to two (2) de-nitrification beds, one bed located upstream to a sub surface disposal system and the second one located on the re-circulation line and upstream to the holding tanks,
- **De-Nitrification Beds:** removal of two (2) de-nitrification beds each consisting of six (6) cells of 1m x 1m x 300mm, containing mixture of hard wood saw dust and sand filled inside an impermeable membrane, equipped with inspection ports, inflow distribution pipes, perforated collection pipes and effluent outflow pipes;

all in accordance with the Application for Approval of Municipal and Private Sewage Works, dated December 23, 2003, design brief, drawings and addendum documents prepared and submitted by Mr. Drago Hasnas, of Emerald Lake Inc. & Mr. Les Szpunar, P.Eng. of Team Aquatic Management Limited, Consulting Engineer.

EXISTING FACILITIES:

- **Pre-treatment:** eleven (11) septic tanks (5- 22,500L, 1- 15,900L, 3- 11,250L, 1-9000L and 1-4,500L) having a total capacity of 175,650L, located within the Emerald Lakes Park Developments shown on drawing No E-98-10 (SP-1) dated February 2001, revised September 2003, prepared by B.K.L Engineering, each tank equipped with two compartments, eight (8) pump chambers collecting effluent from the septic tanks, consisting of one (1) pump and an effluent discharge line together with a low pressure collection sewer system collecting effluent from the septic tanks and discharging to two (2) holding tanks centrally located near the existing septic bed area,
- **Holding Tanks:** two (2) 22,500 L capacity two-compartment tanks each tank equipped with one (1) submersible

effluent pumps rated at 3.42 L/s at 15.7 m total dynamic head, discharging to a system of bio-filters described later, complete with liquid levels, timer pump controls and an alarm system,

- **Bio- Filters:** ten (10) aerobic biofilters each having dimensions 2.44m diameter x 2.44m high, each filter rated for 4500 to 5000L/day, filled with light weight synthetic filter medium designed for a hydraulic loading rate of 2,000 L/m²/d and for an average flow of 42,500 L/d, complete with inlet spray nozzles, inflow distribution, effluent collection and ventilation system, complete with an effluent dividing chamber,

- **Effluent Dosing Tank:** two (2) 4,500L capacity tanks collecting effluent from one of the Bio-filters and discharging to the existing subsurface disposal system and re-circulating to the existing equalization/dosing tank, equipped with two (2) submersible pumps each rated at 3 L/s at 13m total dynamic head, complete with one 4 way mechanical rotating valve distributing to four shallow buried trenches,

- **Subsurface Disposal System:** four (4) a shallow buried trenches each 125m, laid in 300mm wide by approximately 300mm to 450mm deep parallel trenches, excavated in the native soil with center line spacing 2.5m, and each trench equipped with a centrally placed 25 mm diameter perforated distribution pipe and covered by a 300 mm diameter half-pipe chamber and back-filled with native soil, together with an automatic distribution valve on connection from the forcemain to the manifolds feeding the perforated distribution laterals, complete with clean-out valves and pressure gauge connectors on the laterals;

all in accordance with the Application for Approval of Municipal and Private Sewage Works, dated March 30, 1998, design brief, drawings and addendum documents prepared and submitted by Philip M. Keightley, M.Sc., P.Eng., B.K.L Engineering., Consulting Engineers.

For the purpose of this Certificate of Approval and the terms and conditions specified below, the following definitions apply:

"Certificate" means this entire certificate of approval document, issued in accordance with Section 53 of the Ontario Water Resources Act, and includes any schedules;

"Director" means any Ministry employee appointed by the Minister pursuant to section 53 of the Ontario Water Resources Act;

"Ministry" means the Ontario Ministry of the Environment;

"Regional Director" means the Regional Director of the West Central Region of the Ministry;

"District Manager" means the District Manager of the Guelph District Office of the Ministry's West Central Region;

"Owner" means Emerald Lake Inc.;

"Operating Authority" means the Owner or the designated agent of the Owner who is qualified to operate the works.

"works" means the sewage works described in the Owner's application, this certificate and in the supporting documentation referred to herein, to the extent approved by this certificate;

"grab sample" means an individual sample of at least 1000 milliliters collected in the appropriate container at a randomly selected time over a period of time not exceeding 15 minutes;

"average daily flow" means the cumulative total sewage flow to the sewage works during a particular calendar year divided by the number of days within that year during which sewage was flowing to the sewage works;

"BOD₅" means five day carbonaceous biochemical oxygen demand measured in an unfiltered sample;

You are hereby notified that this approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. GENERAL PROVISIONS

- (1) The *Owner* shall ensure that any person authorized to carry out work on or operate any aspect of the *Works* is notified of this *Certificate* and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- (2) Except as otherwise provided by these Conditions, the *Owner* shall design, build, install, operate and maintain the *Works* in accordance with the description given in this *Certificate*, the application for approval of the works and the submitted supporting documents and plans and specifications as listed in this *Certificate*.
- (3) Where there is a conflict between a provision of any submitted document referred to in this *Certificate* and the Conditions of this *Certificate*, the Conditions in this *Certificate* shall take precedence, and where there is a conflict between the listed submitted documents, the document bearing the most recent date shall prevail.
- (4) Where there is a conflict between the listed submitted documents, and the application, the application shall take precedence unless it is clear that the purpose of the document was to amend the application.
- (5) The requirements of this *Certificate* are severable. If any requirement of this *Certificate*, or the application of any requirement of this *Certificate* to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this certificate shall not be affected thereby.

2. EXPIRY OF APPROVAL

The approval issued by this *Certificate* will cease to apply to those parts of the *Works* which have not been constructed within five (5) years of the date of this *Certificate*.

3. CHANGE OF OWNER

- (1) The *Owner* shall notify the *District Manager* and the *Director*, in writing, of any of the following changes within 30 days of the change occurring:
- (a) change of *Owner*;
 - (b) change of address of the *Owner*;
 - (c) change of partners where the *Owner* is or at any time becomes a partnership, and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c.B17 shall be included in the notification to the *District Manager*;
 - (d) change of name of the corporation where the *Owner* is or at any time becomes a corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C39 shall be included in the notification to the *District Manager*;
- (2) In the event of any change in ownership of the *Works*, other than a change to a successor municipality, the *Owner* shall notify in writing the succeeding owner of the existence of this *Certificate*, and a copy of such notice shall be forwarded to the *District Manager* and the *Director*.

4. CONSTRUCTION

- (1) The *Owner* shall ensure that the construction of the works is supervised by a licensed installer or a Professional Engineer, as defined in the Professional Engineers Act.
- (2) Upon construction of the works, the *Owner* shall prepare a statement, certified by a licensed installer or a Professional Engineer, that the *Works* are constructed in accordance with this *Certificate*, and upon request, shall make the written statement available for inspection by *Ministry* staff.

5. MONITORING AND RECORDING

The *Owner* shall, upon commencement of operation of the *Works*, carry out the following monitoring program:

(1) All samples and measurements taken for the purposes of this *Certificate* are to be taken at a time and in a location characteristic of the quality and quantity of the effluent stream over the time period being monitored.

(2) Samples shall be collected of the effluent being discharged to the subsurface disposal system from an effluent dosing tank at the frequency specified, by means of the specified sample type and analyzed for each parameter listed and all results recorded:

Table 1 - Effluent Monitoring - (Effluent discharged to subsurface disposal system)	
Frequency	Once a month during the months of May, July, August and October
Sample Type	Grab
Parameters	BOD5, Total Suspended Solids, Total Phosphorus, Total Ammonia Nitrogen, Nitrate, Nitrite, Total Kjeldahl Nitrogen, pH, Temperature and E-coli.

(3) Establish three (3) groundwater observation wells to monitor the shallow aquifer up-gradient of the disposal trenches, immediately down gradient of the disposal trenches, and at the property boundary in the down gradient flow path from the disposal trenches.

Table 2 - Groundwater Monitoring -(at down-gradient monitoring well)	
Frequency	Monthly (during the months of May, July, August and October)
Sample Type	Grab
Parameters	BOD5, Total Phosphorus, Total Kjeldahl Nitrogen, Nitrates, Nitrites, E-coli and pH.

(4) The monitoring outlined pursuant to subsection (3) shall be undertaken for a period of at least three (3) years following the start up of the *Works*.

(5) Prior to the startup of the *Works*, background groundwater quality must be established by collecting groundwater samples and having them analyzed for the parameters outlined in Table 3.

(6) The Owner shall measure and record the daily volume of effluent being discharged to subsurface disposal system.

(7) The methods and protocols for sampling, analysis and recording shall conform, in order of precedence, to the methods and protocols specified in the following:

(a) the Ministry's Procedure F-10-1, "Procedures for Sampling and Analysis Requirements for Municipal and Private Sewage Treatment Works (Liquid Waste Streams Only), as amended from time to time by more recently published editions;

(b) the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater" (January 1999), ISBN 0-7778-1880-9, as amended from time to time by more recently published editions; and

(c) the publication "Standard Methods for the Examination of Water and Wastewater" (20th edition), as amended from time to time by more recently published editions.

(8) The *Owner* shall retain for a minimum of three (3) years from the date of their creation, all records and information related to or resulting from the monitoring activities required by this *Certificate*.

(9) Following completion of one full year of operation of the sewage works, if the quality of effluent to the subsurface disposal system satisfies the objectives stipulated in Condition 6, and demonstrates consistently to attenuate nitrates to the levels claimed, as evidenced by the results of the monitoring program required by this condition, the Regional Director may reduce the number of parameters and the required frequency of sampling.

6. EFFLUENT OBJECTIVES

The *Owner* shall use best efforts to design, construct and operate the *Works* with the objective that the concentrations of the materials named below as effluent parameters are not exceeded in the effluent being discharged to the subsurface disposal system.

Table 3 - Effluent Objectives

Effluent Parameter	Concentration, mg/L
BOD5	10
Suspended Solids	10
Nitrate Nitrogen	5

7. OPERATIONS AND MAINTENANCE

(1) The *Owner* shall prepare an operations manual within six (6) months of the introduction of sewage to the *Works*, that includes, but not necessarily limited to, the following information:

- (a) operating procedures for routine operation of the *Works*; and
- (b) inspection programs, including frequency of inspection, for the *Works* and the methods or tests employed to detect when maintenance is necessary.

(2) The *Owner* shall maintain the operations manual current and retain a copy at the location of the *Works* for the operational life of the *Works*. Upon request, the *Owner* shall make the manual available to *Ministry* staff.

(3) The *Owner* shall prepare and make available for inspection by *Ministry* staff, a maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings within one (1) year of *Substantial Completion* of the *Works*. The maintenance agreement and drawings must be retained at the site and kept current.

8. REPORTING

(1) One week prior to the start up of the operation of the *Works*, the *Owner* shall notify the *District Manager* (in writing) of the pending start up date.

(2) The *Owner* shall prepare, and submit upon request, a performance report, on an annual basis, within ninety (90) days following the end of the period being reported upon. The first such report shall cover the first annual period following the commencement of operation of the *Works* and subsequent reports shall be submitted to cover successive annual periods following thereafter. The reports shall contain, but shall not be limited to, the following information:

- (a) a summary and interpretation of all monitoring data and a comparison to the effluent objectives outlined in Condition 6, including an overview of the success and adequacy of the *Works*;
- (b) a tabulation of the daily volumes of effluent disposed through the subsurface disposal system during the reporting period;
- (c) a summary of all maintenance carried out on any major structure, equipment, apparatus, mechanism or thing forming part of the *Works*; and
- (d) a description of any operating problems encountered and corrective actions taken.

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is imposed to ensure that the *Works* are built and operated in the manner in which they were described for review and upon which approval was granted. This condition is also included to emphasize the precedence of Conditions in the *Certificate* and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. The condition also advises the Owners their responsibility to notify any person they authorized to carry out work pursuant to this *Certificate* the existence of this *Certificate*.
2. Condition 2 is included to ensure that, when the *Works* are constructed, the *Works* will meet the standards that apply at the time of construction to ensure the ongoing protection of the environment.
3. Condition 3 is included to ensure that the *Ministry* records are kept accurate and current with respect to the approved works and to ensure that subsequent owners of the *Works* are made aware of the *Certificate* and continue to operate the *Works* in compliance with it.
4. Condition 4 is included to ensure that the works are constructed, and may be operated and maintained such that the environment is protected and deterioration, loss, injury or damage to any person or property is prevented.
5. Condition 5 is included to enable the *Owner* to evaluate and demonstrate the performance of the *Works*, on a continual basis, so that the *Works* are properly operated and maintained at a level which is consistent with the design objectives specified in the *Certificate* and that the *Works* does not cause any impairment to the receiving watercourse.
6. Condition 6 is imposed to establish non-enforceable effluent quality objectives which the *Owner* is obligated to use best efforts to strive towards on an ongoing basis. These objectives are to be used as a mechanism to trigger corrective action proactively and voluntarily before environmental impairment occurs.
7. Condition 7 is included to require that the *Works* be properly operated, maintained, and equipped such that the environment is protected. As well, the inclusion of an operations manual, maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings governing all significant areas of operation, maintenance and repair is prepared, implemented and kept up-to-date by the owner and made available to the *Ministry*. Such a information is an integral part of the operation of the *Works*. Its compilation and use should assist the *Owner* in staff training, in proper plant operation and in identifying and planning for contingencies during possible abnormal conditions. The manual will also act as a benchmark for *Ministry* staff when reviewing the *Owner's* operation of the work.
8. Condition 8 is included to provide a performance record for future references, to ensure that the *Ministry* is made aware of problems as they arise, and to provide a compliance record for all the terms and conditions outlined in this *Certificate*, so that the *Ministry* can work with the *Owner* in resolving any problems in a timely manner.

This Certificate of Approval revokes and replaces Certificate(s) of Approval No. 3-0378-98-006 issued on November 13, 1998

In accordance with Section 100 of the Ontario Water Resources Act, R.S.O. 1990, Chapter 0.40, as amended, you may by written notice served upon me and the Environmental Review Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 101 of the Ontario Water Resources Act, R.S.O. 1990, Chapter 0.40, provides that the Notice requiring the hearing shall state:

1. The portions of the approval or each term or condition in the approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The Certificate of Approval number;
6. The date of the Certificate of Approval;
7. The name of the Director;
8. The municipality within which the works are located;

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review Tribunal
2300 Yonge St., 12th Floor
P.O. Box 2382
Toronto, Ontario
M4P 1E4

AND

The Director
Section 53, *Ontario Water Resources Act*
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 314-4600, Fax: (416) 314-4506 or www.ert.gov.on.ca**

The above noted sewage works are approved under Section 53 of the Ontario Water Resources Act.

DATED AT TORONTO this 11th day of March, 2004

Mohamed Dhalla, P.Eng.
Director
Section 53, *Ontario Water Resources Act*

MN/
c: District Manager, MOE Guelph
Clerk, the Township of Puslinch
Drago Hasnas, Emerald Lake Inc.

NOVEMBER 2024
AERIAL IMAGERY



Natural Heritage System Area (Aerial Imagery, 2004)

-  Subject Lands
-  7260 Gore
-  Natural Heritage System Area



2012 AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

Mar 9, 2012

(3)

Final



Ministry of the Environment
Ministère de l'Environnement

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6567-8GBPBV
Issue Date: March 2, 2012

Emerald Lake Inc.
7248 Gore Road, Rural Route 2
Puslinch, Ontario, N0B 2J0

Site Location: Emerald Lake Trailer Park
7248 Gore Road,
Township of Puslinch, County of Wellington

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

upgrading and expansion of an existing sewage treatment and subsurface disposal works with a *Rated Capacity* of **49,200 litres per day**, consisting of pre-treatment facilities, recirculating bio-filters, de-nitrification beds and subsurface disposal systems to service an expanded and existing 240 units seasonally occupied (May 1st to October 31st) trailer park development, located in Part of South Half, Lot 29, Gore Concession, in the Township of Puslinch, and an existing Class IV septic system with a *Rated Capacity* of **5,065 litres per day** serving a seasonal water park located north of the CP Railway on the same site location, as follows:

Proposed Works

- **Pre-treatment:** one (1) septic tank having a capacity of 22,500 litres, located at the west of Green Access Road within the Emerald Lakes Park Developments as shown on drawing No SP-1 Rev F dated February 2001, prepared by B.K.L Engineering. The tank consists of two compartments, together with a separate pump chamber of 2,250 litres capacity for collecting effluent from the septic tank and is equipped with one (1) pump and an effluent discharge line to discharge into a low pressure collection system collecting effluent from the septic tank and trailers to discharge into the existing septic tank at the west of the Baseball Court 3;
- **Treatment:** seven (7) aerobic biofilters each having dimensions of 2.44 metres diameter x 2.44 metres high for an installed total of sixteen (16) biofilters, each rated for 4,500 litres per day to 5,000 litres per day, filled with light weight synthetic filter medium design for a hydraulic loading rate of 2,000 litres per square metre per day complete with inlet spray nozzles, inflow distribution, effluent collection and ventilation system, complete with an

effluent dividing chamber; and

- **Subsurface Disposal System:** four (4) shallow buried trenches each 125 metres in length, laid in 300 millimetres wide by approximately 300 millimetres to 450 millimetres deep parallel trenches, excavated in the native soil with centre line spacing 2.5 metres, and each trench equipped with a centrally placed 25 millimetre diameter perforated distribution pipe and covered by a 300 millimetre diameter half-pipe chamber and back-filled with native soil, together with an automatic distribution valve on connection from the forcemain to the manifolds feeding the perforated distribution laterals, complete with clean-out valves and pressure gauge connectors on the laterals.

Previous Works

"Previous Works" approved under Approval Number 5058-5VDTJN dated March 11, 2004 as follows :

- **Pre-treatment:** twelve (12) septic tanks (6- 22,500 litres, 1- 15,900 litres, 3- 11,250 litres, 1-9000 litres and 1-4,500 litres) having a total capacity of 198,150 litres, located within the Emerald Lakes Park Developments shown on drawing No E-98-10 (SP-1) dated February 2001, revised September 2003, and October 2010, prepared by BKL Engineering, each tank equipped with two compartments, nine (9) pump chambers collecting effluent from the septic tanks, consisting of one (1) pump and an effluent discharge line together with a low pressure collection sewer system collecting effluent from the septic tanks and discharging to two (2) holding tanks centrally located near the existing septic bed area,
- **Holding Tanks:** two (2) 22,500 litres capacity two-compartment tanks each tank equipped with one (1) submersible effluent pumps rated at 3.42 litres per second at 15.7 metres total dynamic head, discharging to a system of bio-filters described later, complete with liquid levels, timer pump controls and an alarm system,
- one (1) chemical (molasses carbon source) dosing system complete with supply tank, wash water facility and one (1) dosing pump rated at 0.8 litre per hour;
- one(1) 40,000 litres capacity precast concrete tank complete with baffles, vents, access hatch and all required piping works to act as an anaerobic denitrification tank;
- one (1) 4,500 litres capacity pumping station (tank) complete with two (2) duplex controlled submersible sewage pumps, rated at 2.0 litres per second at 6.3 metres total dynamic head;
- **Bio-Filters:** nine (9) aerobic biofilters each having dimensions 2.44 metres diameter x 2.44 metres high, each filter rated for 4500 litres per day to 5000 litres per day, filled with light weight synthetic filter medium designed for a hydraulic loading rate of 2,000 litres per square metre per day and for an average flow of 42,500 litres per day, complete with

inlet spray nozzles, inflow distribution, effluent collection and ventilation system, complete with an effluent dividing chamber;

- **Effluent Dosing Tank:** two (2) 4,500 litres capacity tanks collecting effluent from one of the Bio-filters and discharging to the existing subsurface disposal system and re-circulating to the existing equalization/dosing tank, equipped with two (2) submersible pumps each rated at 3 litres per second at 13 metres total dynamic head, complete with one 4-way mechanical rotating valve distributing to four shallow buried trenches;
- **Subsurface Disposal System:** four (4) shallow buried trenches each 125 metres, laid in 300 millimetres wide by approximately 300 millimetres to 450 millimetres deep parallel trenches, excavated in the native soil with centre line spacing 2.5 metres, and each trench equipped with a centrally placed 25 millimetre diameter perforated distribution pipe and covered by a 300 millimetre diameter half-pipe chamber and back-filled with native soil, together with an automatic distribution valve on connection from the forcemain to the manifolds feeding the perforated distribution laterals, complete with clean-out valves and pressure gauge connectors on the laterals; and
- including all other controls, electrical equipment, instrumentation, piping, valves and appurtenances essential for the proper operation of the aforementioned sewage Works .

all in accordance with supporting documents listed in Schedule 'A'.

For the purpose of this environmental compliance approval, the following definitions apply:

"*Approval* " means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed herein;

"*BOD₅* " (also known as TBOD₅) means five day biochemical oxygen demand measured in an unfiltered sample and includes carbonaceous and nitrogenous oxygen demand;

"*CBOD₅* " means five day carbonaceous (nitrification inhibited) biochemical oxygen demand measured in an unfiltered sample;

"*Director* " means a person appointed by the Minister pursuant to section 5 of the *EPA* for the purposes of Part II.1 of the *EPA* ;

"*District Manager* " means the District Manager of the Guelph District Office of the Ministry;

"*E. Coli* " refers to the thermally tolerant forms of *Escherichia* that can survive at 44.5 degrees Celsius;

"*EPA* " means the Environmental Protection Act, R.S.O 1990, c.E.19, as amended;

"*Licensed Installer* " means a person who holds a licence under Article 2.12.3.1 of the Ontario Building Code;

"*Ministry* " means the Ontario Ministry of the Environment;

"*Owner* " means Emerald Lake Inc., and includes its successors and assignees;

"*Previous Works* " means those portions of the works previously constructed and approved;

"*Professional Engineer* " means a person entitled to practise as a Professional Engineer in the Province of Ontario under a licence issued under the Professional Engineers Act;

"*Proposed Works* " means the sewage works described in this *Approval* ;

"*Rated Capacity* " means the *Average Daily Flow* for which the *Works* are approved to handle;

"*Substantial Completion* " has the same meaning as "*substantial performance* " in the Construction Lien Act; and

"*Works* " means the sewage works described in this *Approval* and includes both *Previous Works* and *Proposed Works* .

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. GENERAL PROVISIONS

- 1.1 The *Owner* shall ensure that any person authorized to carry out work on or operate any aspect of the *Works* is notified of this *Approval* and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- 1.2 Except as otherwise provided by these Conditions, the *Owner* shall design, build, install, operate and maintain the *Works* in accordance with the description given in this *Approval* , the application for approval of the *Works* and the submitted supporting documents and plans and specifications as listed in this *Approval* .
- 1.3 Where there is a conflict between a provision of any submitted document referred to in this *Approval* and the Conditions of this *Approval* , the Conditions in this *Approval* shall take precedence, and where there is a conflict between the listed submitted documents, the document bearing the most recent date shall prevail.
- 1.4 Where there is a conflict between the listed submitted documents, and the application, the application shall take precedence unless it is clear that the purpose of the document was to amend the application.
- 1.5 The requirements of this *Approval* are severable. If any requirement of this *Approval* , or the application

of any requirement of this *Approval* to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this *Approval* shall not be affected thereby.

2. EXPIRY OF APPROVAL

- 2.1 The approval issued by this *Approval* will cease to apply to those parts of the *Works* which have not been constructed within **five (5) years** of the date of this *Approval* .

3. CHANGE OF OWNER

- 3.1 The *Owner* shall notify the *District Manager* and the *Director* , in writing, of any of the following changes within **thirty (30) days** of the change occurring:

- (a) change of *Owner* ;
- (b) change of address of the *Owner* ;
- (c) change of partners where the *Owner* is or at any time becomes a partnership, and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c.B17 shall be included in the notification to the *District Manager* ; and
- (d) change of name of the corporation where the *Owner* is or at any time becomes a corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C39 shall be included in the notification to the *District Manager* .

4. CONSTRUCTION

- 4.1 The *Owner* shall ensure that the construction of the works is supervised by a *Licensed Installer* , as defined in the Ontario Building Code or a *Professional Engineer* , as defined in the Professional Engineers Act.
- 4.2 Upon construction of the works, the *Owner* shall prepare a statement, certified by a *Licensed Installer* or a *Professional Engineer* , that the *Works* are constructed in accordance with this *Approval* , and upon request, shall make the written statement available for inspection by *Ministry* staff and staff of the local municipality.

5. MONITORING AND RECORDING

The *Owner* shall, upon commencement of operation of the *Works* , carry out the following monitoring program:

- 5.1 All samples and measurements taken for the purposes of this *Approval* are to be taken at a time and in a location characteristic of the quality and quantity of the effluent stream over the time period being monitored.

- 5.2 Samples shall be collected of the **effluent** being discharged to the subsurface disposal system from an effluent dosing tank at the frequency specified, in Table 1, by means of the specified sample type and analyzed for each parameter listed and all results recorded:

Table 1 - Effluent Monitoring - (Effluent discharged to subsurface disposal system)	
Frequency	Once a month during the months of May, July, August and October
Sample Type	Grab
Parameters	<i>CBOD</i> , , Total Suspended Solids, Total Phosphorus, Total Ammonia Nitrogen, Nitrate, Nitrite, Total Kjeldahl Nitrogen, pH, Temperature and <i>E-coli</i> .

- 5.3 Establish three (3) groundwater observation wells to monitor the shallow aquifer up-gradient of the disposal trenches, immediately down gradient of the disposal trenches, and at the property boundary in the down gradient flow path from the disposal trenches.

Table 2 - Groundwater Monitoring -(at down-gradient monitoring well)	
Frequency	Monthly (during the months of May, July, August and October)
Sample Type	Grab
Parameters	<i>CBOD</i> , , Total Phosphorus, Total Kjeldahl Nitrogen, Nitrates, Nitrites, <i>E-coli</i> and pH..

- 5.4 The monitoring outlined pursuant to Condition 5.3 shall be undertaken for a period of at least **three (3) years** following the start up of the *Works* .
- 5.5 Prior to the startup of the *Works* , background groundwater quality must be established by collecting groundwater samples and having them analyzed for the parameters outlined in Table 3.
- 5.6 The Owner shall measure and record the daily volume of effluent being discharged to subsurface disposal system.
- 5.7 The methods and protocols for sampling, analysis and recording shall conform, in order of precedence, to the methods and protocols specified in the following:
- (a) the Ministry's Procedure F-10-1, "Procedures for Sampling and Analysis Requirements for Municipal and Private Sewage Treatment Works (Liquid Waste Streams Only), as amended from time to time by more recently published editions;
 - (b) the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater" (January 1999), ISBN 0-7778-1880-9, as amended from time to time by more recently published editions; and
 - (c) the publication "Standard Methods for the Examination of Water and Wastewater" (20th edition), as amended from time to time by more recently published editions.

5.8 The *Owner* shall retain for a minimum of **three (3) years** from the date of their creation, all records and information related to or resulting from the monitoring activities required by this *Approval* .

5.9 Following completion of **one (1) year** of operation of the sewage works, if the quality of effluent to the subsurface disposal system satisfies the objectives stipulated in Condition 6, and demonstrates consistently to attenuate nitrates to the levels claimed, as evidenced by the results of the monitoring program required by this condition, the *District Manager* may reduce the number of parameters and the required frequency of sampling.

6. EFFLUENT OBJECTIVES

6.1 The *Owner* shall use best efforts to design, construct and operate the *Works* with the objective that the concentrations of the materials named below as effluent parameters are not exceeded in the effluent being discharged to the subsurface disposal system.

Table 3 – Effluent Objectives	
Effluent Parameter	Concentration Objective (milligrams per litre unless otherwise indicated)
CBOD ₅	10.0
Total Suspended Solids	10.0
Nitrate Nitrogen	5.0

6.2 The *Owner* shall include in all reports submitted in accordance with Condition 8 a summary of the efforts made and results achieved under this Condition.

7. OPERATIONS AND MAINTENANCE

7.1 The *Owner* shall prepare an operations manual within **six (6) months** of the introduction of sewage to the *Works* , that includes, but not necessarily limited to, the following information:

- (a) operating procedures for routine operation of the *Works* ; and
- (b) inspection programs, including frequency of inspection, for the *Works* and the methods or tests employed to detect when maintenance is necessary.

7.2 The *Owner* shall maintain the operations manual current and retain a copy at the location of the *Works* for the operational life of the *Works* . Upon request, the *Owner* shall make the manual available to *Ministry* staff.

7.3 The *Owner* shall prepare and make available for inspection by *Ministry* staff, a maintenance agreement with the manufacturer of the treatment process/technology and a complete set of "as constructed" drawings within **one (1) year** of *Substantial Completion* of the *Works* . The maintenance agreement and drawings must be retained at the site and kept current.

- 7.4 The *Owner* shall ensure that adequate steps are taken to ensure that the area of the *Works* are protected from all forms of vehicle traffic and are not used for any purpose other than sewage disposal.
- 7.5 In the event a break-out is observed from the bed, the *Owner* shall do the following:
- (a) sewage discharge to that subsurface disposal system shall be discontinued;
 - (b) incident immediately reported verbally to the Spills Action Centre (SAC) at (416) 325-3000 or 1-800-268-6060;
 - (c) followed by a written report to the *District Manager* within **one (1) week** of the break-out;
 - (d) during the time remedial actions are taking place the sewage generated at the site shall not be allowed to discharge to a surface water body or to the environment; and
 - (e) sewage generated at the site shall be safely collected and disposed of through a licensed waste hauler to an approved sewage disposal site.
- 7.6 In the event the treatment process/technology experiences operational problems during its service life, the *Owner* shall do the following:
- (a) sewage discharge to the subsurface disposal system shall be discontinued;
 - (b) incident immediately reported verbally to the *District Manager* , followed by a written report within **one (1) week**;
 - (c) during the time remedial actions are taking place the sewage generated at the site shall not be allowed to discharge to a surface water body or to the environment; and
 - (d) sewage generated at the site shall be safely collected and disposed of through a licensed waste hauler to an approved sewage disposal site.

8. REPORTING

- 8.1 **One (1) week** prior to the start up of the operation of the *Works* , the *Owner* shall notify the *District Manager* (in writing) of the pending start up date.
- 8.2 The *Owner* shall prepare, and submit upon request, a performance report, on an annual basis, within **ninety (90) days** following the end of the period being reported upon. The first such report shall cover the first annual period following the commencement of operation of the *Works* and subsequent reports shall be submitted to cover successive annual periods following thereafter. The reports shall contain, but shall not be limited to, the following information:

- (a) a summary and interpretation of all monitoring data and a comparison to the effluent objectives outlined in Condition 6, including an overview of the success and adequacy of the *Works* ;
- (b) a tabulation of the daily volumes of effluent disposed through the subsurface disposal system during the reporting period;
- (c) a summary of all maintenance carried out on any major structure, equipment, apparatus, mechanism or thing forming part of the *Works* ; and
- (d) a description of any operating problems encountered and corrective actions taken.

Schedule 'A' forms part of this *Approval* and contains a list of supporting documentation / information received, reviewed and relied upon in the issuance of this *Approval* .

SCHEDULE 'A'

1. Application for Approval of Sewage Works submitted by Philip M. Keightley, M.Sc., P.Eng., B.K.L. Engineering., and signed by Drago Hasnas, Owner/Manager, Emerald Lake Inc., dated January 26, 2011; and all supporting documentation and information; and
2. Approval Number 5058-5VDTJN, issued on March 11, 2004.

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is imposed to ensure that the *Works* are built and operated in the manner in which they were described for review and upon which approval was granted. This condition is also included to emphasize the precedence of Conditions in this *Approval* and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. The condition also advises the owners their responsibility to notify any person they authorized to carry out work pursuant to this *Approval* the existence of this *Approval*.
2. Condition 2 is included to ensure that the *Works* are constructed in a timely manner so that standards applicable at the time of *Approval* of the *Works* are still applicable at the time of construction, to ensure the ongoing protection of the environment.
3. Condition 3 is included to ensure that the *Ministry* records are kept accurate and current with respect to approved *Works* and to ensure that subsequent owners of the *Works* are made aware of this *Approval* and continue to operate the *Works* in compliance with it.
4. Condition 4 is included to ensure that the *Works* are constructed, and may be operated and maintained such that the environment is protected and deterioration, loss, injury or damage to any person or property is prevented.
5. Condition 5 is included to enable the *Owner* to evaluate and demonstrate the performance of the *Works*, on a continual basis, so that the *Works* are properly operated and maintained at a level which is consistent with the design objectives specified in this *Approval* and that the *Works* does not cause any impairment to the environment.
6. Condition 6 is imposed to establish non-enforceable effluent quality objectives which the *Owner* is obligated to use best efforts to strive towards on an ongoing basis. These objectives are to be used as a mechanism to trigger corrective action proactively and voluntarily before environmental impairment occurs.
7. Condition 7 is included to require that the *Works* be properly operated, maintained, and equipped such that the environment is protected. As well, the inclusion of an operations manual, maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings governing all significant areas of operation, maintenance and repair is prepared, implemented and kept up-to-date by the owner and made available to the *Ministry*. Such a information is an integral part of the operation of the *Works*. Its compilation and use should assist the *Owner* in staff training, in proper plant operation and in identifying and planning for contingencies during possible abnormal conditions. The manual will also act as a benchmark for *Ministry* staff when reviewing the *Owner*'s operation of the *Works*.
8. Condition 8 is included to provide a performance record for future references, to ensure that the *Ministry*

is made aware of problems as they arise, and to provide a compliance record for all the terms and conditions outlined in this *Approval*, so that the *Ministry* can work with the *Owner* in resolving any problems in a timely manner.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).
5058-5VDTJN issued on March 11, 2004.**

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me and the Environmental Review Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:

1. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed

Pursuant to subsection 139(3) of the Environmental Protection Act, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The environmental compliance approval number;
6. The date of the environmental compliance approval;
7. The name of the Director, and;
8. The municipality or municipalities within which the project is to be engaged in

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5

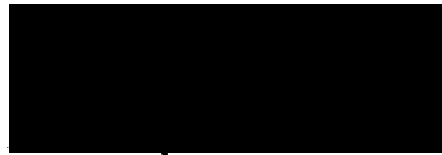
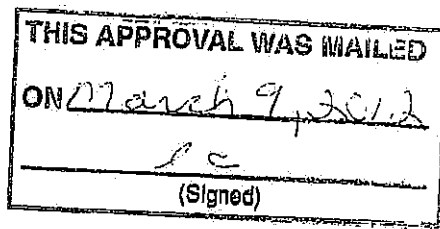
AND

The Director appointed for the purposes of
Part II.1 of the Environmental Protection Act
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

* Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 314-4506 or www.ert.gov.on.ca

The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.

DATED AT TORONTO this 2nd day of March, 2012



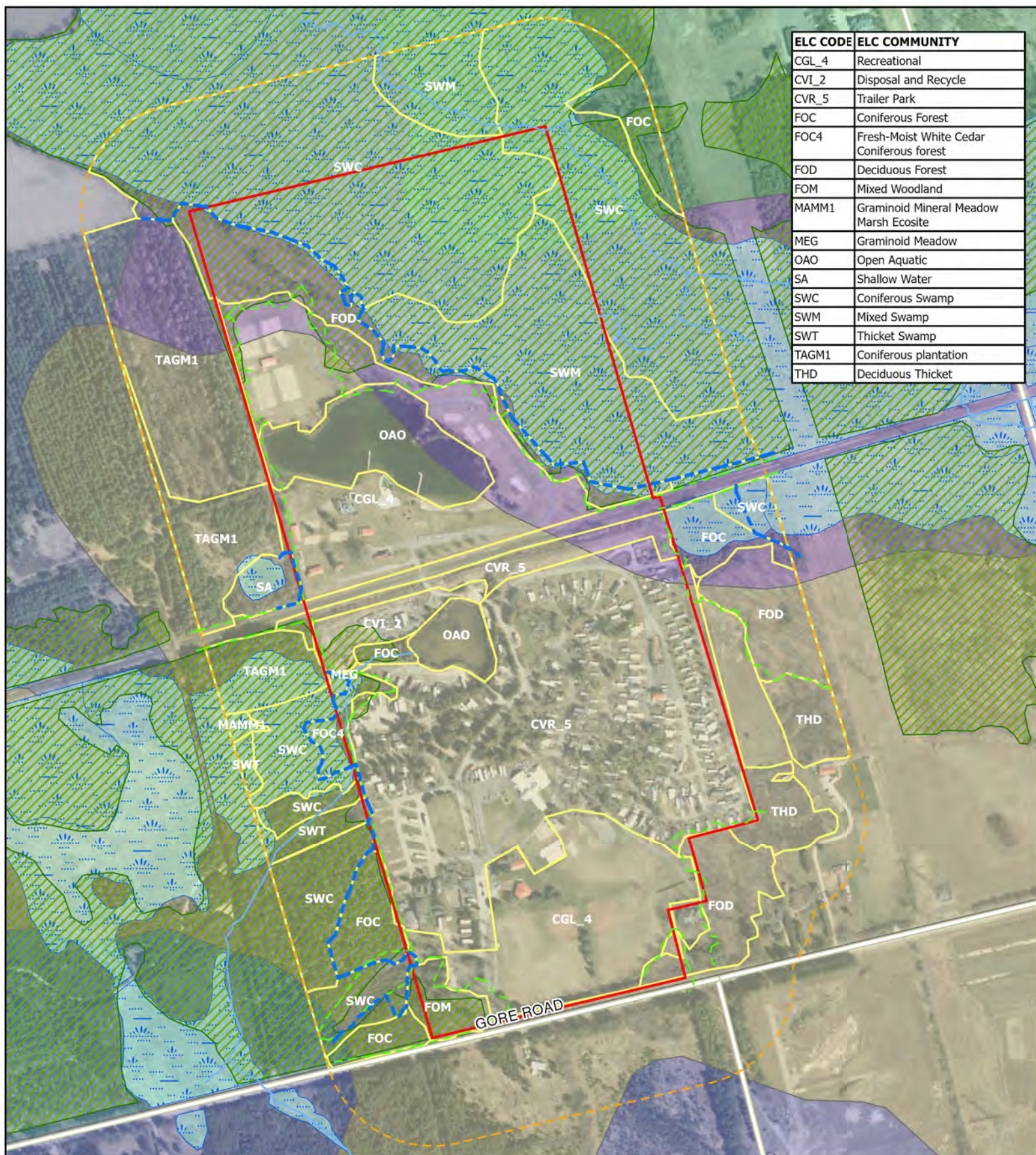
Mansoor Mahmood, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

AA/

c: District Manager, MOE Guelph District Office
Philip M. Keightley P.Eng., BKL Engineering ✓

C

Appendix C: Figures from Scoped Environmental Impact Study



ELC CODE	ELC COMMUNITY
CGL_4	Recreational
CVI_2	Disposal and Recycle
CVR_5	Trailer Park
FOC	Coniferous Forest
FOC4	Fresh-Moist White Cedar Coniferous forest
FOD	Deciduous Forest
FOM	Mixed Woodland
MAMM1	Graminoid Mineral Meadow Marsh Ecosite
MEG	Graminoid Meadow
OAO	Open Aquatic
SA	Shallow Water
SWC	Coniferous Swamp
SWM	Mixed Swamp
SWT	Thicket Swamp
TAGM1	Coniferous plantation
THD	Deciduous Thicket

LEGEND

- PROJECT LOCATION

 STUDY AREA

WATERCOURSE

 WETLAND

 SIGNIFICANT WOODED AREAS
- DESKTOP WETLAND LIMIT

DESKTOP WOODLAND LIMIT

DESKTOP ELC (2020)
- SOIL SURVEY OF ONTARIO

 DONNYBROOK SANDY LOAM

 DUMFRIES LOAM

 DUMFRIES SANDY LOAM

 FARMINGTON LOAM

 GILFORD LOAM

 MUCK



LEGEND

 PROJECT LOCATION

 STUDY AREA

GREENBELT PLAN DESIGNATION

 PROTECTED COUNTRYSIDE

 NATURAL HERITAGE SYSTEM AREA

WELLINGTON COUNTY OFFICIAL PLAN

 GREENLANDS

 CORE GREENLANDS

TOWNSHIP OF PUSLINCH ZONING

 ENVIRONMENTAL PROTECTION OVERLAY

 NATURAL ENVIRONMENT ZONE

Information Sources:

1. Orthophotography: ESRI World Imagery, 2025, accessed April 2026.
2. Wetlands, Natural Heritage System Area & Greenbelt Designation accessed through GEO. Accessed April, 2026.
3. Greenlands & Core Greenlands provided by Wellington County. Accessed April, 2026.
4. Natural Environment Zone & Environmental Protection Overlay referenced from Explore Wellington mapping application. Accessed April, 2026.



DATE: APRIL 2026

PROJECT #: AA25-281A

SCALE: 1:5,500



ABOUD & ASSOCIATES INC.
Consulting Arborists • Ecologists • Landscape Architects
3-6 Sidbrough Road South, Guelph, Ontario, N1H 8N8, 519.822.4839 - www.aboudinc.com

TITLE: EXISTING POLICY MAPPING

PROJECT: EMERALD LAKE
TOWNSHIP OF PUSLINCH, ON

FIGURE NO:

2



SIGNIFICANT NATURAL FEATURE
REMOVAL = 0.22HA

SIGNIFICANT WOODLAND
EXPANSION = 0.24HA

LEGEND

PROJECT LOCATION
 STUDY AREA
 DESKTOP WOODLAND LIMIT

GREENBELT PLAN DESIGNATION

 NATURAL HERITAGE SYSTEM AREA

TOWNSHIP OF PUSLINCH ZONING

 ENVIRONMENTAL PROTECTION OVERLAY
 NATURAL ENVIRONMENT ZONE

WELLINGTON COUNTY OFFICIAL PLAN

 GREENLANDS
 CORE GREENLANDS

SIGNIFICANT NATURAL FEATURE CHANGES

 EXPANSION
 REMOVAL

DATE: APRIL 2026

PROJECT #: AA25-281A

SCALE: 1:4,500

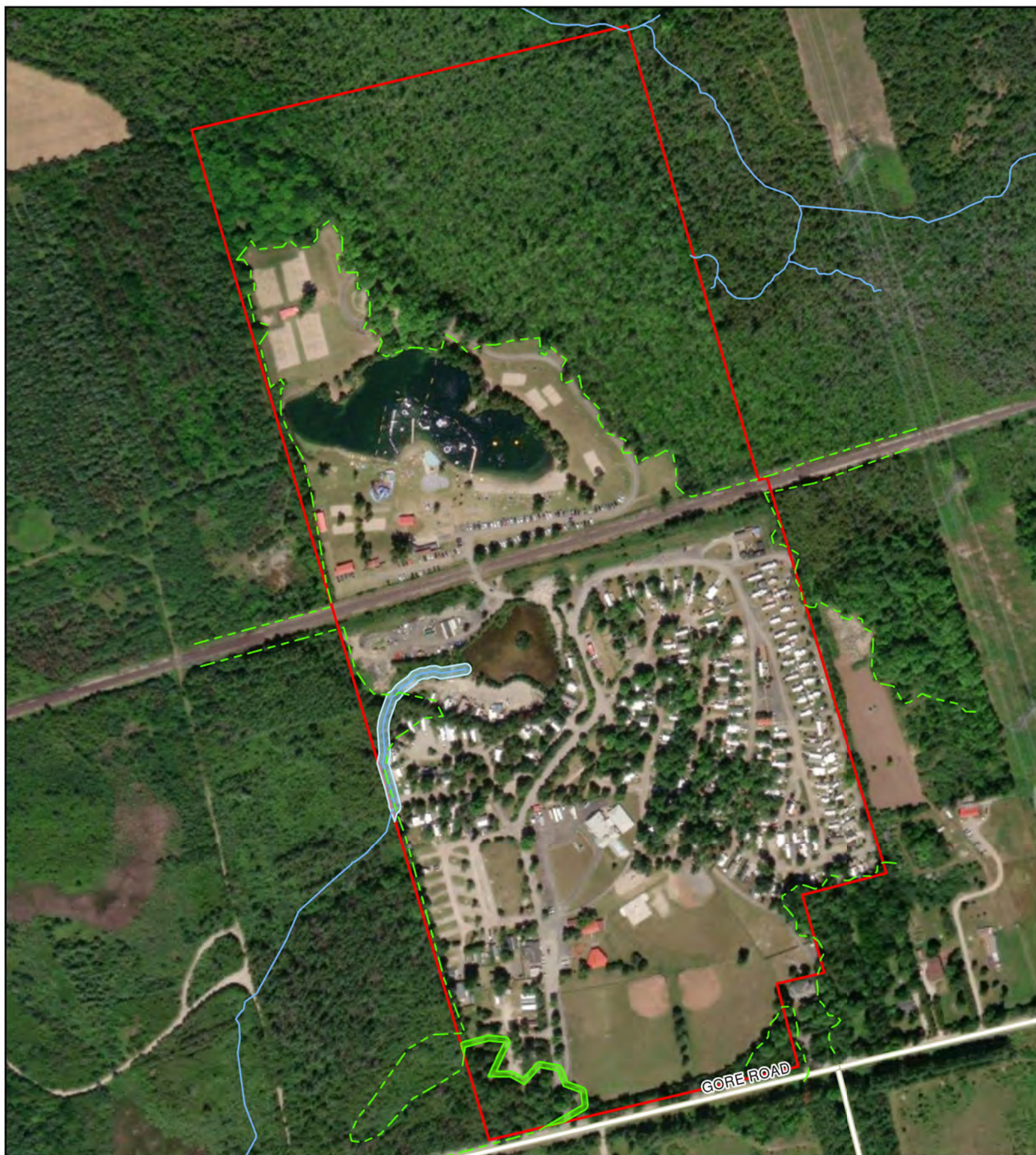
ABOUT & ASSOCIATES INC.
Consulting Arborists • Ecologists • Landscape Architects
3-6 Sidburn Road South, Guelph, Ontario N1H 9N8 • 519.822.8829 • www.aboutandinc.com

TITLE: LOCATIONS OF SIGNIFICANT NATURAL
FEATURE REMOVAL & EXPANSION

PROJECT: EMERALD LAKE
TOWNSHIP OF PUSLINCH, ON

FIGURE NO: 3

Information Sources:
 1. Orthophotography: ESRI World Imagery, 2025, accessed April 2026.
 2. Wetlands accessed through GEO. Accessed April, 2026.
 3. Greenlands & Core Greenlands provided by Wellington County. Accessed April, 2026.
 4. Natural Environment Zone & Environmental Protection Overlay referenced from Explore Wellington mapping application. April 2026.



LEGEND

- PROJECT LOCATION
- DESKTOP WOODLAND LIMIT
- WATERCOURSE
- WATERCOURSE BUFFER (5M) & RESTORATION AREA
- WOODLAND BUFFER (5M) & RESTORATION AREA

Information Sources:
 1. Orthophotography: ESRI World Imagery, 2025, accessed March 2026.
 2. Watercourses provided by HCA, Accessed March 30, 2026.



DATE: MARCH 2026

PROJECT #: AA25-281A

SCALE: 1:4,500



TITLE: RECOMMENDED BUFFERS & RESTORATION AREAS

PROJECT: EMERALD LAKE TOWNSHIP OF PUSLINCH, ON

FIGURE NO:

4



May 15, 2026

Monika Farncombe
Planning & Corporate Services Coordinator
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0

Dear Ms. Farncombe:

**RE: Zoning By-law Amendment and Lot Adjustment Applications
 Emerald Lake Resort and Waterpark
 7248 and 7260 Gore Road
 Our File: 25231A**

On behalf of our client, Darago Hasnas, we are pleased to submit applications for a Zoning By-law Amendment and Consent (lot line adjustment) for Emerald Lake Resort & Waterpark (7248 Gore Road) and the adjacent residential lot owned by Mr. Hasnas (7260 Gore Road).

Emerald Lake Resort & Waterpark is an existing recreational commercial campground and trailer park, while 7260 Gore Road is located immediately to the east of the subject lands and is developed with a single detached dwelling.

Zoning By-law Amendment

The subject lands and 7260 Gore are approximately 36 hectares and 0.35 hectares in size respectively, and are located on the north side of Gore Road between Concession Road 7 and Sideroad 25 South, approximately 3 kilometers southwest of Morriston. The subject lands contain a recreational campground and waterpark which is bisected by a Canadian Pacific Kansas City (CPKC) rail line. The waterpark and associated recreational facilities – including volleyball courts and natural areas – are located north of the railway, with the recreational campground and related ancillary buildings situated south of the rail line.

Emerald Lake contains 272 sites accommodating recreational vehicles (RVs), cabins, and tent camping. There are no expansions or additions proposed to the existing campground as part of the application. The purpose of the application is to recognize the existing development and bring it into compliance with the Zoning By-law.

Lot Line Adjustment

Separately, a consent application for lot line adjustment is proposed to add a small portion of the campground to 7260 Gore Rd to create a more regular shaped lot consistent with the applicable regulations of the Zoning By-law.

Enclosed Materials

In response to the pre-consultation record and subsequent discussions, the following plans and reports were prepared in support of a complete Zoning By-law Amendment application:

1. Schematic Site Plan, prepared by MHBC Planning;
2. Planning Justification Report, prepared by MHBC Planning;
3. Environmental Noise and Vibration Letter, prepared by SLR;
4. Servicing Report, Site Grading and Servicing Plan, prepared by Clearford Waterworks;
5. Scoped Environmental Impact Study, prepared by Natural Resource Solutions Inc (NRSI);
and
6. Nitrate Impact Assessment, prepared by Clearford Waterworks.

A draft Zoning By-law Amendment is included as part of the Planning Justification Report.

The application fees will be forwarded to your attention separately.

We look forward to working with the Township on this project. Please contact the undersigned should you have any questions pertaining to the enclosed.

Yours truly,

MHBC

Trevor Hawkins, M.PL, MCIP, RPP
Partner

Jennifer Gaudet, BES, MCIP, RPP
Associate

cc. *Drago Hasnas*
Ruth Snow

Emerald Lake Resort ZBA
Puslinch Township, Wellington County
Scoped Environmental Impact Study

Prepared for:
Emerald Lake

Project Number:
AA25-281B

Date:
April 24, 2026



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1.0 Introduction

The proponent requires a Scoped Environmental Impact Study (EIS), prepared to the satisfaction of the Township of Puslinch and Wellington County, as part of a Zoning By-Law Amendment (ZBA) that evaluates the potential natural heritage impacts that may have occurred on and adjacent to the property as a result of the expansion to the existing trailer park beyond the 200 sites permitted by the Zoning By-law. The subject property, located at 7248 Gore Rd. in the Township of Puslinch, includes a seasonal recreational trailer and camping resort and associated amenities.

The Scoped EIS must determine if the existing, as built, development was retroactively compliant with the policies that were applicable at the time of development based on a review of historic air photos and mapping resources, assess the impacts resulting from any development that was not in compliance with the applicable policies and provide recommendations for mitigation and restoration, where non-compliant development has taken place. In addition, the EIS will propose appropriate buffers that protect sensitive and significant natural heritage features on the property over the long term through the development of the proposed ZBA.

Through consultation with the Township of Puslinch, and their peer review consultant, Dougan Ecology, a Terms of Reference (ToR) for the Scoped EIS has been developed and agreed upon. The final ToR is provided in Appendix 1.

1.1 Current Land Use and Study Area

The study area, located primarily at 7248 Gore rd., in the Township of Puslinch, comprises all lands within the proponent property limit and up to 120 metres beyond (Figure 1). The subject lands and adjacent lands include seasonal recreation and associated amenities, watercourse, wetlands, waterbodies, woodlands, rural residential, and agricultural lands.

1.2 Site History & Regulations

1.2.1 Site Planning History

Per the Site Chronology prepared by MHBC (December 9, 2025) an agreement was made September 1983 through an Official Plan amendment to redesignate lands from 'Rural' to 'Seasonal recreation' which included clauses that set a maximum of 200 sites and no tent camping. The agreement indicated that an OPA was approved to redesignate the lands from rural to seasonal recreation some time before the signing of the agreement. Per the Township of Puslinch Official Plan Schedule 'A', 1988, almost the entirety of the subject lands appears to be identified as Seasonal Recreational with a small portion of the north-eastern corner identified as Conservation (Image 1).

In January 1994, a Zoning By-Law Amendment was approved to recognize and include existing recreational land uses within the park at the time of the amendment. This site-specific provision included pools, water slides, mini golf, volleyball courts, horseshoe pits, picnic shelters and

playgrounds present to the north of the rail line and concession stands, picnic shelters, variety store, laundromat, baseball diamonds and washrooms to the south of the rail line.

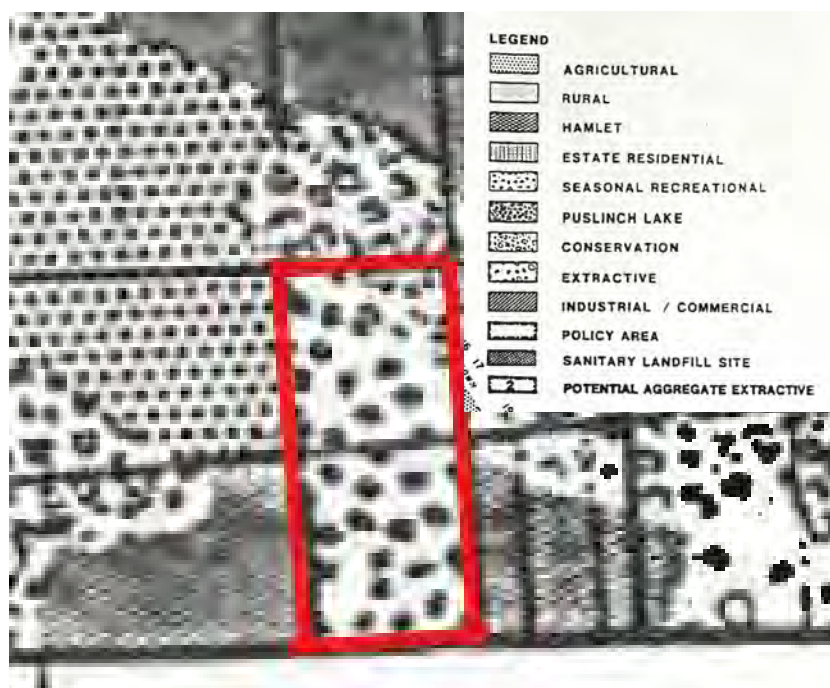


Image 1. Excerpt Township of Puslinch Official Plan Schedule 'A' (1988)

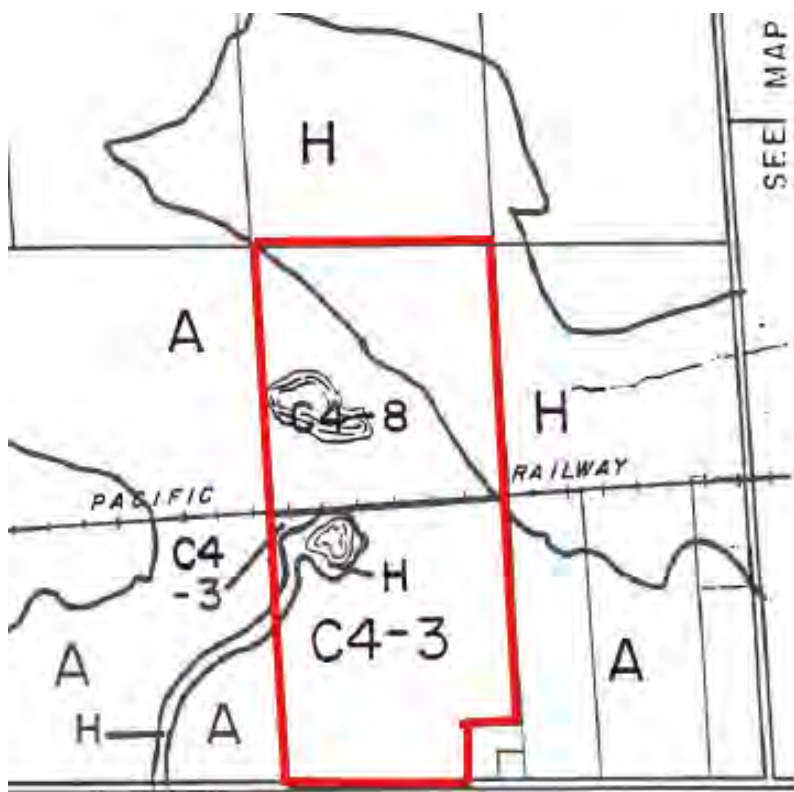


Image 2. Excerpt Key Map no. 6 (Township of Puslinch Zoning By-Law No. 19/85)

Per the 1995 consolidation of the Township of Puslinch Zoning By-Law key map no. 6 (Image 2), lands zoned as 'Hazard' are present to the northeast of the existing volleyball courts, and the pond area and watercourse to the south of the rail line only.

In 1999, the Wellington County Official Plan designated the property as Recreational, Greenland and Core Greenlands (Image 3), with a change in designation in the upper property northwest corner, now designated as Core Greenland that was previously Recreational.



Image 3. Excerpt Wellington County Official Plan Schedule A7 Puslinch (1999)

In December 2004, the Greenbelt Plan came into effect and lands within the subject property were designated as protected countryside with some areas along the western limit, north of the rail line and a small corner of the northeastern limit south of the rail line designated as within the Natural Heritage System of the Protected Countryside.

The 1999 County of Wellington Official Plan (Feb 24, 2011 revision) Schedule A7 Puslinch provides clarity on the limits of designations within the subject lands (Image 4) and continues to

identify the majority of the site as recreational, with a small area of Core Greenland and Greenland within and adjacent to lands to the southern portion of the property and Core Greenlands and Greenlands within the northeast portion of the lands north of the railway, much of the immediately adjacent lands is identified as secondary agricultural. No changes were noted between the 1999 schedule and 2011 schedules, with 2011 shown due to the significant improvement in mapping. The area of Core Greenland within the southern portion of the property is of unknown origin and does not match the limits of any significant natural feature present on the site currently, or in the past. This is further discussed in section 3.

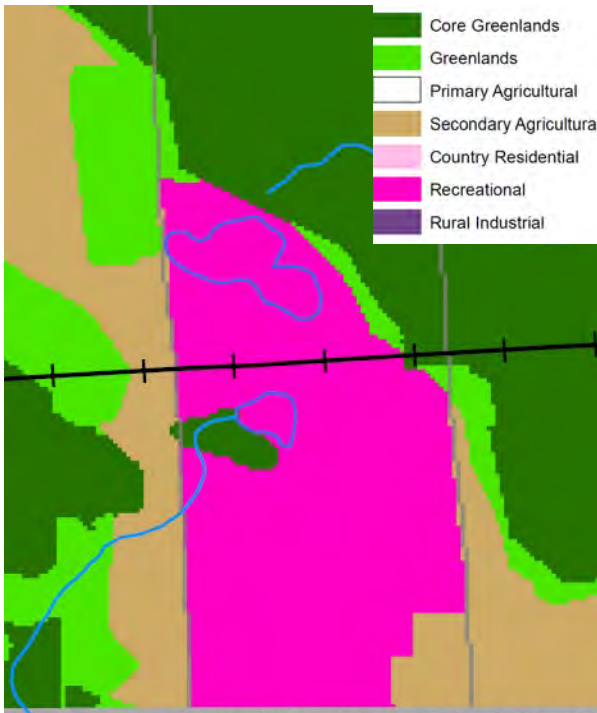


Image 4. Excerpt, 2011 Wellington County OP Schedule A7

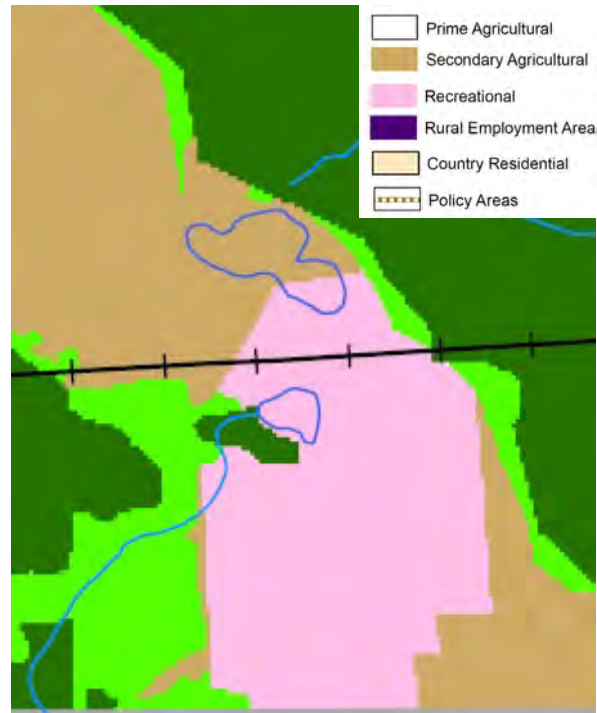


Image 5. Excerpt, 2016, Schedule A7, Wellington County OP

The County of Wellington Official Plan was brought into conformity with the Greenbelt Plan on December 19, 2014. An updated Official Plan schedule from the 2016 consolidation (image 5) identifies small changes in the designations along the western limit of the property, however, the northern portion of the property was partly changed from recreational to secondary agriculture in the area around and including Emerald Lake. The Township of Puslinch 2017 draft Zoning By-law map B-1, Natural Environment and Environmental protection overlay, generally matches the limits of Greenlands and Core Greenlands in the 2016 consolidation of the Wellington County OP.

1.2.2 Current Legislation & Regulations

As part of the scoped EIS, the following existing legislation have been considered, where it applies to natural heritage, to review against the development timeline prepared by MHBC and identify if Emerald Lake Resort Inc. were retroactively compliant with the policies that were

applicable at the time of site alteration based on a review of historic air photos, information provided by the proponent and current site plans and site investigations (Figure 2).

1.2.2.1 Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development.

Regarding Natural Heritage Protection the PPS states that:

“Natural features and areas shall be protected for the long term.”

And that:

“The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.”

Under the PPS, “development and site alteration are not permitted in:

- a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E;
- b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
- c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
- d) significant wildlife habitat;
- e) significant areas of natural and scientific interest; and
- f) coastal wetlands in Ecoregions 5E, 6E and 7E that are not subject to policy 4.1.4.b),

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. “

The PPS also states that:

1. *“Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.*
2. *Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.*

Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.”

As such, the Provincial Planning Statement applies to any site development or site alteration that was not an existing use and occurred outside the limits of the approved Site plan. This EIS is required to determine compliance with the relevant PPS policies that were in force at the time that site alteration outside the limits of the approved Site Plan occurred and demonstrate that the no negative impacts on natural features or their functions have taken place.

1.2.2.2 Greenbelt Plan (2017)

The Greenbelt Plan identifies where urbanization should not occur in order to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape. Per Schedule 1 of the Greenbelt Plan, the entirety of the study area is identified as Protected Countryside, with several areas within the Natural Heritage System. Per the Greenbelt Plan, the components of the Natural Heritage System present within the property limits includes Wetlands and Significant Woodlands, while an ANSI is present within the study area.

Per Section 3.2.5, for lands within a key natural heritage feature or a key hydrologic feature in the Protected Countryside, development or Site alteration is not permitted within the Natural Heritage System, however, several exceptions apply, including exception c) *Infrastructure, aggregate, recreational, shoreline and existing uses, as described by and subject to the policies of section 4.*

Per section 4.1.2 Recreational Use policies, recreational uses are subject to several policies, including:

1. *Residential dwelling units, other than for an employee, shall not be permitted in association with recreational uses.*
2. *An application to establish or expand a major recreational use in the Natural Heritage System shall be accompanied by a vegetation enhancement plan that incorporates planning, design, landscaping and construction measures that:*
 - a. *Maintain or, where possible, enhance the amount of natural self- sustaining vegetation on the site and the connectivity between adjacent key natural heritage features or key hydrologic features;*
 - b. *Wherever possible, keep intermittent stream channels and drainage swales in a free-to-grow, low-maintenance condition;*
 - c. *Minimize the application and use of pesticides and fertilizers; and*
 - d. *Locate new natural self-sustaining vegetation in areas that maximize the ecological functions and ecological value of the area.*

3. *An application to expand or establish a major recreational use shall be accompanied by a conservation plan demonstrating how water, nutrient and biocide use shall be kept to a minimum, including through the establishment and monitoring of targets.*
4. *Small-scale structures for recreational uses (such as boardwalks, footbridges, fences, docks and picnic facilities) are permitted within key natural heritage features and key hydrologic features; however, the number of such structures and the negative impacts on these features should be minimized.*

The Greenbelt Plan identifies Existing Uses as:

- a) uses legally established prior to the date that the Greenbelt Plan came into force on December 16, 2004; or
- b) for the purposes of lands added to the Greenbelt Plan after December 16, 2004, uses legally established prior to the date the Greenbelt Plan came into force in respect of the land on which the uses are established.

As such, the Greenbelt Plan applies to any site development or site alteration that was not an existing use prior to 2004 that occurred outside the limits of the approved Site plan and is not listed as a permitted use per Section 3.2.5. The EIS is required to determine compliance where development occurred within the NHS after the Greenbelt Plan was enacted.

1.2.2.3 Ontario Regulation 41/24- Prohibited Activities, Exemptions and Permits

Per the HCA Web-Map, the study area is partially within the Regulation Limit due to the presence of the Fletcher Creek Swamp Provincially Significant Wetland Complex, regulated watercourse and waterbodies, including Emerald Lake. As such, Ontario Regulation 41/24 applies to the subject lands, and should be considered in the context of development or development activities within or adjacent to regulated features that is not considered an Existing Use. Current Regulation limits are shown in Image 4.



Image 4. HCA Regulation Areas Mapping, retrieved March 30, 2026

1.2.2.4 County of Wellington Official Plan 1999 (2025 consolidation)

Per Schedule B7 of the Wellington County Official Plan, the study area contains Core Greenlands and Greenlands. The Wellington County Official Plan states that Core Greenlands are comprised of areas which have greater sensitivity or significance and include:

- Provincially Significant Wetlands;
- All other wetlands;
- Habitat of endangered or threatened species and fish habitat; and
- Hazardous lands.

Development and site alteration within Provincially Significant Wetlands or in significant habitat of threatened or endangered species are generally not permitted, except where provincial and federal requirements allow.

Permitted uses and activities may include:

- a) agriculture;*
- b) existing uses;*
- c) conservation;*
- d) forestry;*
- e) aggregate extraction within Mineral Aggregate Areas subject to appropriate rezoning,*
- f) licensing and the policies of this Plan;*
- g) open space; and*

h) passive recreation.

Greenlands are defined as being other significant natural heritage features including habitat, areas of natural and scientific interest, streams and valleylands, woodlands, environmentally sensitive areas, ponds, lakes and reservoirs and natural links.

However, Section 5.6.2 states:

“The above uses for both, the Core Greenlands and Greenlands designations, as well as accessory buildings and structures, shall only be permitted if:

- there are no negative impacts on significant features and functions and no significant negative impacts on other greenland features and functions;”*

And,

“Where development is proposed in the Greenland system or on adjacent lands, the County or local municipality shall require the developer to:

- a) Identify the nature of the features potentially impacted by the development;*
- b) Prepare, where required, an environmental impact assessment to ensure that the requirements of this Plan will be met, and consider enhancement of the natural area where appropriate and reasonable.*
- c) Address any other relevant requirements set out in Section 4.6.3 Environmental Impact Assessment.*

No development will be approved unless the County is satisfied that the Greenland and Environmental Impact Assessment policies are met.”

As such, any development that was not included in the approved site plan and was not an existing use prior to the Wellington County Official Plan being brought into conformity with the Greenbelt Plan, may need to demonstrate conformity with the current Wellington County Official plan.

1.2.2.5 Township of Puslinch Comprehensive Zoning By-Law No. 19/85

Township of Puslinch Zoning By-Law No. 19/85 was in effect until January 2020, when the updated By-law, further discussed in section 1.2.2.6 came into effect. As discussed in section 1.2.2.1, Key map no. 6 (Image 2), lands zoned as 'Hazard' are present to the northeast of the existing volleyball courts, and the pond area and watercourse to the south of the rail line only.

Section 20 – H Zone – Hazard Zone states:

(2) Uses Permitted

No Person Shall, within any H Zone, use any lot or any existing building or structure for any purpose except one or more of the following H uses, namely:

- a) Agricultural use;

- b) Forestry;
- c) Fish and wildlife management;
- d) A boathouse or boat dock;
- e) Any public use.

As such, any buildings or structures within the H zone that was not included in the approved site plan and occurred after Zoning By-Law No. 19/85 was in force, may need to demonstrate conformity with those zoning requirements.

1.2.2.6 Township of Puslinch Comprehensive Zoning By-Law No. 023-18

According to the Township's Comprehensive Zoning By-Law Schedule A, portions of the subject property are currently zoned as Natural Environment (NE) and include Environmental Protection (EP) zone overlay. This is not a separate zone, but an overlay that represents natural heritage features included in the "Greenlands" designation of the County Official Plan, as well as lands to which HCA's regulations apply.

Section 4.31 Setbacks from the Natural Environment Zone states:

"No buildings or structures, including a private sewage treatment systems and associated tile weeping bed, shall be constructed closer than 30 metres from the limit of a Natural Environment (NE) Zone. Notwithstanding the required setback noted above or any other provision in this By-law to the contrary: Where a vacant lot existed on the day of passing of this By-law, a building permit may be issued for permitted buildings or structures, excluding new agricultural buildings and structures, provided that:

- 1) there is no other suitable location on the lot outside of the 30-metre minimum setback, and
- 2) a setback of at least three (3) metres from the NE Zone boundary is maintained.

Notwithstanding the above, the setback from the Natural Environment (NE) Zone may be reduced to a distance that is supported by the Conservation Authority having jurisdiction pursuant to its authority provided under the Conservation Authorities Act, R.S.O. 1990. Where the Conservation Authority provides written approval for a reduced setback from the NE Zone an amendment to this By-law shall not be required."

Section 13.2 Environmental Protection Zone Overlay states that:

"The EP overlay permits development of the lands within the EP overlay, subject to the following special provisions:

- Development will not be allowed in significant wildlife or plant habitat unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the habitat or its ecological functions.
- Development will not be allowed in significant woodlands unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the woodland or its ecological functions.

- Erection of a building or structure will not be allowed within an HCA regulated area unless written approval from the HCA is obtained.

In addition, the by-law identifies that *Nothing in this By-law shall apply to prevent the use of any existing lot, building, or structure for any purpose prohibited by this By-law if it was lawfully used for such purposes on the day of the passing of this By-law so long as it continues to be used for that purpose.*

As such, any buildings or structures development within the NE zone that was not included in the approved site plan and occurred after the current Zoning By-Law was in force (January 2020), may need to demonstrate conformity with the zoning requirements.

1.3 Terms of Reference

Based on the applicable Policies, and Regulations, a Terms of Reference (ToR) for the Scoped Environmental Impact Study (EIS) was developed and submitted to the Hamilton Conservation Authority (HCA), Wellington County and the Township of Puslinch on January 19, 2026. Peer review comments were received from NPG and Dougan Ecology, on behalf of the Township on February 24, 2026, and the TOR resubmitted February 25, 2026. Further comments were received March 23, 2026, and March 30, 2026, and have been addressed within this report.

The ToR and agency correspondence are provided in *Appendix 1*.

2.0 Methods

2.1 Background Review

A background information review was conducted of the physical features within the vicinity of the study area. The following resources were consulted during this review:

- Aerial photography of the subject site,
- HCA Web-map of regulation limit,
- Conservation Authorities Act: Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits.
- County of Wellington Official Plan (2025 consolidation).
- Township of Centre Wellington Zoning By-law No. 2009-045 (2024 consolidation).
- NHIC Make-a-map, accessed December 3, 2025.
- Ministry of Natural Resources Request for information,
 - o Fletcher Creek Swamp wetland evaluations, 1984, 1985,
 - o Fletcher Creek Swamp Forest Life Science ANSI Inventory Checklist, undated

2.2 Background Natural Heritage Features

Per the NHIC make-a-map, the subject lands include woodlands and portions of the Fletcher Creek provincially significant wetland complex, while the study area also includes lands within the Fletcher Creek Swamp Forest Life Science ANSI. The limits of the ANSI are not congruent with the limits of the Fletcher Creek PSW complex.

2.3 Desktop Wetland Boundary Delineation

Cheryl-Anne Ross, certified in the Ontario Wetland Evaluation System, reviewed the following resources, and considered the results of a site visit completed January 12, 2026, following a thaw, to determine a preliminary desktop wetland limit:

- Geospatial Ontario imagery [Southern Ontario CIR-1997-0033-4218-Stereo-NRG-40cm. Received February 19, 2026, from Geospatial Ontario imagery order.
- Google. (n.d.). [Satellite images of Emerald Lake Resort, 2004, 2012, 2013, 2015, 2016, 2017, 2018, 2019, 2020, 2023, 2025]. *Google Earth Pro*. Retrieved February 20, 2026, from earth.google.com
- University of Toronto. [Air Photos of Southern Ontario 1954]. Retrieved February 13, 2026 from <https://mdl.library.utoronto.ca/collections/geospatial-data/air-photos-southern-ontario>
- Geospatial Ontario Imagery [Ontario Imagery Webmap Service, Southwestern Ontario 2020] Retrieved February 23, 2026 from <https://ws.lioservices.lrc.gov.on.ca>
- D.W. Hoffman, B.C. Matthews & R.E. Wicklund, 1963, Soil Survey of Wellington County, retrieved February 23, 2026 from <https://geohub.lio.gov.on.ca/datasets/ontarioca11::soil-survey-complex/about>
- Toronto Region Conservation authority REST server [0-5m contours] retrieved February 13, 2026, from https://services1.arcgis.com/d0ZCwU7eGKVeNiEE/arcgis/rest/services/dbo_Contours_0_5m/FeatureServer
- Natural Resources Canada, National Air Photo Library [NAPL_3170820_1980, NAPL_3170829_1980, NAPL_3178943_1980, NAPL_3432284_1989], retrieved February 20, 2026.

In the field, wetland boundaries should be determined using the vegetation species present, where vegetation was comprised of 50% wetland and 50% upland species, however, per the *Ontario Wetland Evaluation System* (OWES 2022) aerial photographs, high-resolution digital orthophotography and other imagery are useful support tools for estimating the location and extent of wetland habitats, particularly where landowner permission to access the property has not been granted. Where access is not restricted, desktop wetland boundaries will be confirmed in the field with HCA staff in May 2026.

2.4 Desktop Ecological Land Classification

A desktop Ecological Land Classification (ELC) was completed by qualified ecologist, Cheryl-Anne Ross, OMNRF Certified in Ecological Land Classification. Vegetation communities within

the study area were characterized to the community series and delineated following the Ecological Land Classification (ELC) system for Southern Ontario 1st approximation; community codes used generally follow the 2nd approximation (Lee, et al., 1998, 2008). Boundaries of ELC communities were mapped using aerial images for both current (GEO, 2020) and historical (Google earth, 2004) site conditions using the resources identified in Section 2.2 as well as an out of season site visit completed January 12, 2026. 2020 air photos were used to delineate the current communities due to the resolution of the available imagery and leaf-off conditions, which allowed for a more accurate delineation. While 2025 imagery is available, no changes to vegetation communities were noted between 2020 and 2025, and therefore, the decision was made to use the more detailed resolution.

2.5 Desktop Woodland Delineation

Per the Natural Heritage Reference Manual (2005), the criteria for defining the significance of a woodland includes: the size of the woodland in relation to the surrounding landscape, the ecological functions (species composition, age of trees, stand history), economic importance, proximity to other woodlands, linkages, water protection, and diversity. Additionally, the County of Wellington Official Plan identifies that woodlands greater than 4ha and plantations greater than 10ha are considered significant. Woodlands include treed features meeting the forestry definition of a woodland and generally include features with greater than 60% tree cover. The limits of significant woodlands have been determined using the most recent leaf-on imagery (Google, 2025) and the desktop ELC.

2.6 Desktop Interpretation Confidence and Uncertainty statement

The desktop woodland and wetland limits have been inferred using available historic mapping, aerial imagery, and professional interpretation. These limits provide a reasonable estimate of past conditions but include a moderate level of uncertainty. Some key assumptions include that visible landscape features have generally remained consistent over time and that historic imagery can reliably indicate limits of vegetation and wetland features. However, past disturbances or land use changes may not be fully captured due to the passage of time between available years of historic imagery.

Historic imagery is also often of a lower resolution, seasonally limited, or incomplete, making it difficult to clearly define feature boundaries. Available mapping may also vary in accuracy, scale and detail. Desktop Interpretation is further constrained in areas where differences in community features are subtle, transitional, or already altered in early records. In these cases, boundary delineation also relied on indirect indicators such as topography, soils, and surrounding vegetation.

Overall, the results of the desktop assessment are considered appropriate for the purposes of a historic site development review, based on the availability of imagery in regular intervals since at least 1997, with several imagery sources prior to initiation of the resort development.

3.0 Existing Conditions

3.1 Wetland Characteristics

Through a review of historic imagery (1954, 1980, 2004, 2014), current imagery (2020, 2025) and 1997 FRI infrared imagery, changes in land use from agricultural to tree or shrub communities on adjacent properties have generally appeared to result in an increase in wetland communities on adjacent lands when compared to the boundaries of wetlands identified as Provincially Significant per the existing OWES assessment. Which was last delineated through a desktop review in 2009 by MNR staff.

While a wetland pocket is not present in any current wetland mapping within the study area, the County of Wellington Official Plan has identified a small area of Core Greenland immediately adjacent to the small pond. Per a site visit completed in January 2026, this area is comprised of open bedrock (image 5), appearing as a white feature in historic air photos (1954) and the 1997 FRI (Figure 1a), which may have contributed to an improper interpretation as wetland during a previous iteration of the wetland mapping. Regardless, a wetland is not currently present, nor was present, at any time on the site, and this area should not be considered Core Greenland.



Image 5. Bedrock Area adjacent pond, looking west from southern limit of pond

Within the southern portion of the property most of the wetland communities are located outside the property limits with wetland features west of the property including coniferous swamp, dominated by Eastern White Cedar, and deciduous thicket swamps with small pockets of meadow marsh. While the small area of wetland to the northeast of the southern property appears to include a mixed swamp. The northern property includes significantly more wetland features within the property limits including mixed swamp, thicket swamp and meadow marsh pockets and one open water or shallow aquatic wetland is present directly east of the property, north of the railway.

When comparing the desktop wetland delineation to the MNR wetland limits, most areas are in line with existing mapping, with slight changes based on updated imagery and the FRI imagery, as well as the topographic information from HCA. Two areas of significant proposed changes are noted in the southern portion of the property limits. A significant increase in wetland features and the limits of the boundary in relation to the property edge has been identified for the western property limit, with an increase in swamp thicket and coniferous swamp communities as agricultural use ceased and plantations failed. These communities are quite young (Figure 1c). Evidence of saturated soils and changes in topography were observed during the site visit and is further supported by the contours and FRI imagery.

To the west, at the northern most corner of the property, the wetland limit has been interpreted at a greater distance from the property boundary, this has been determined through the review of the FRI imagery and is supported by the contour mapping. The previous area noted as wetland directly adjacent the property is within the same contour limit as the Deciduous forest community directly south as well as the site topography of the overall resort, indicating that it is unlikely to present a wetland community. Per a review from the edge, the community appears to be an Eastern White Cedar coniferous forest, with no evidence of pooling in the understory, despite a very recent melt event at the time of the site investigation. While the Imagery is cut off slightly at this junction, The FRI also shows a difference in canopy height between the FOC and SWC communities and is also evident in 2017 and 2014 leaf-off Google Earth historic Imagery.

3.2 Desktop Wetland Boundary Delineation

The subject property contains a total of five distinct wetland complex features, two within the northern portion of the property to the east, and adjacent the property in the southwestern most corner, and two to the west and one to the east, of the southern portion of the property. Three are part of the Fletcher Creek Swamp Provincially Significant Wetland Complex. A preliminary wetland boundary has been delimited based on the limits of wetland communities within the study area (*Figure 1c*).

3.3 Desktop Ecological Land Classification

Preliminary desktop ELC to the Community Series has been determined for communities within the study area for both 2004 and 2020 leaf-off imagery (*Figure 1b, 1c*) in order to compare changes in natural feature limits at the time the Greenbelt Plan came into force to current site

conditions. Communities present within the study area include Coniferous Plantations, Mixed and Coniferous Swamps, Thicket Swamps, Deciduous, Coniferous and Mixed Forests, Shallow Aquatic and Open Aquatic features. Community types were established based on a review of leaf-off and leaf-on imagery, FRI imagery and the site visit.

3.4 Desktop Woodland Delineation

A preliminary woodland boundary has been delimited based on the limits of woodland communities within the study area using 2025 leaf-on imagery and ELC community delineation. (*Figure 1c*).

3.5 Geology and Soils

Surficial Geology for the subject property is generally comprised of Paleozoic bedrock and Glaciofluvial deposits within the northeastern most limits associated with the watercourse.

Soil types within the subject property include Farmington and Donnybrook Series (Hoffman et al., 1963). The Farmington Series soils are described as shallow soils with a depth of less than a foot over underlying limestone bedrock with low moisture holding capacity, while Donnybrook Series is described as gravelly soils occurring in hills and ridges with stratified sands and gravels mixed with stones. Soils that have been classified as Muck typically consist of organic deposits that have accumulated in shallow lakes, ponds or wet undrained depressions. The Soil Survey of Wellington County has limitations based on the scale and shows the general pattern of soils in the County.

3.6 Watercourse

A small, potentially intermittent, watercourse is present within southern portion of the property, draining from the western corner of the pond to the property limit, turning south along the property edge, before turning west into the adjacent property. The watercourse is identified as a stream and is part of the Fletcher Creek subwatershed within the Hamilton Conservation Authority jurisdiction.

4.0 Site Development

4.1 Historic Site Plan

Per the approved proposed Site Plan (Figure 5) for the Emerald Lake Resort, the entirety of the southern portion of the property was proposed to be developed for recreational use. The plan included a layout for 200 trailer sites, store and office, septic tank and tile bed, comfort stations, pavilions, areas for future development – recreational, and several play areas. No areas of the southern portion of the site were identified as hazard lands or limited for recreational development. The northern portion of the property was partly identified as recreational and partly hazard lands. The recreational limits included parking, roads, picnic areas, pavilions,

patios, pools and a miniature golf facility. Hazard lands were generally delineated to the northeast of the recreational area (Figure 1a).

4.2 Existing Site Plan

Per the As-Built Site Plan provided by the proponent (MIG Engineering, 2024) the southern portion of the site includes 209 Seasonal trailer sites, 28 Single Trailer Full Hook up, 23 transient sites & group camping sites, Tent and Pop-up Trailer Sites, 21 cabins (272 total sites), internal roads, sports fields, playgrounds, septic and washrooms. An as-built plan for the northern property was not provided and as a result, has been interpreted from the available air photos as including, internal roads, volleyball courts, washrooms, pavilions, pools, picnic areas, a splash pad and parking areas.

4.3 Site Development History

4.3.1 Prior to Greenbelt enactment

Per our review of historic air photos from all sources identified in Section 2.2, the subject lands, which are comprised of a former quarry and agricultural uses, have generally been cleared within the current limits of the existing recreational uses since at least 1954 (Figure 1a). Natural heritage features present at this time included several small, what appear to be, wooded or scrubby areas scattered within the southern portion of the property, and the property is almost entirely surrounded by agricultural land uses. The northern property is similarly bisected as it is today by the natural heritage features within the northeastern portion, and Emerald lake and surrounding cleared land within the southwestern portion. Aerial photos from 1980 while quite pixelated at the site scale, show a similar pattern of cleared lands, scrub/woodland, with an additional cleared area north of Emerald Lake, approximately matching the area of volleyball courts in more recent imagery, indicating the recreational area limits have been cleared since at least 1980. Review of the 1997 FRI clearly shows the complete development of the northern limits of the property, including the volleyball courts, internal roads, picnic areas and several small structures, while the southern portion of the property has built out several baseball diamonds, an internal road and cleared areas are of a similar size and location to what is observed in the 1954 imagery, with limited regeneration of vegetation in some areas (Figure 1a).

Aerial photos from 2004 (Figure 1b) were then reviewed to determine site conditions and limits of natural heritage features at the time the Greenbelt Plan was enacted. By 2004, site development within the northern property development was complete and matching site conditions identified in current air photos, indicating that all recreational development to the north of the rail line was existing at the time of enactment. The southern portion of the property development generally matches current site conditions, including all internal road development, recreational baseball diamonds, limits of trailer sites, berm development along the railway limits and site clearing. Some treed areas are present along the western boundary, with sites present within the scattered trees throughout the central portions of the site and not all trailer site areas

are occupied or clearly delimited by driveways. The northeastern corner of the property continues to be cleared to the property limits, with evidence of site materials and a small berm extending south from the rail berm, and evidence of site works or grading already complete or underway in this area. Adjacent lands have significantly filled in with vegetation, with young plantations to the west while treed features have expanded into agricultural areas to the east. This indicates that most of the recreation area within the southern portion of the property was existing at the time of the Greenbelt Plan enactment, apart from a few small contiguous treed areas which are discussed further in the context of the current site conditions.

4.3.2 Post Greenbelt Enactment

Aerial photos from 2020 (Figure 1c) and 2025 (Figure 2) were reviewed to determine the current site conditions at the time of the zoning application, to determine changes in natural heritage features between the enactment of the Greenbelt Plan and the current application. Within the northern portion of the property, recreational land use limits have not changed since at minimum 1997, no changes to the limits of natural heritage features were observed, and recreational uses appear to be consistent with previous years. Within the southern portion of the property, trailer sites are now generally all occupied with some vacant sites in transient trailer areas. Several small areas of tree removal have been noted in the northwest corner, around the western side of the small pond and small sections immediately south of there, where material storage takes place, these have been mapped and are shown in Figure 4, these removal areas are contiguous to a small coniferous woodland feature and the adjacent property woodland and took place in approximately 2014 and between 2009-2012, respectively. All removals are outside the greenbelt plan NHS.

5.0 Natural Feature Impacts & Proposed Mitigation

5.1 Impact Assessment

The development of the Emerald Lake Resort has resulted in minor intrusions to the existing natural features since the approval of the site plan, however, all development on site is located within the recreational areas approved in the original Site Plan (BSRD, revised 1990). No recent intrusions within the hazard lands zone have been identified. Changes to the limits of present natural heritage features have included some minor encroachment into and removal of a small portion of the woodland feature adjacent the pond and watercourse. A detailed assessment of the natural feature type and details of impacts (if any) is outlined below.

5.1.1 Woodland

Per the review of the present woodlands and aerial photo interpretation, approximately 0.22 ha of woodland (*Figure 4*) was removed since 2004. These areas are identified as Environmental Protection Overlay in the current Township Zoning and include both Greenlands and a small area of Core Greenlands (of unknown origin that does not appear to correlate with any natural heritage feature, past or present), identified within the property. However, all three intrusions are within the limits of the approved recreational area of the site plan in the southern property limit.

In addition, several expansions of the limit of woodlands are noted as having increased woodland features by approximately 0.24ha. An overall increase in woodland cover of approximately 0.02 ha at the site level (Figure 4).

5.1.2 Wetlands

Per the review of historic aerial photo interpretation, no impacts to regulated wetland features appear to have occurred and any site development within the regulation limits to these features were existing prior to 2004, and within the limits of the approved plan. As a result, no recent impacts to wetlands were identified as part of this assessment.

5.1.3 Watercourse

No changes to the watercourse location or limits were noted following the review of historic imagery and available watercourse mapping layers. Minor impacts may have occurred due to the removal of woodland in the vicinity of the watercourse. Mitigation in the form of a proposed buffer and restoration in the areas adjacent the watercourse is recommended to improve the features' ecological function and reduce potential future degradation as a result.

5.2 Proposed Mitigation

As no changes in the total woodland were identified, no additional woodland compensation is recommended at this time. Mitigation is recommended to provide a buffer to existing natural features, where development is immediately adjacent to improve the ecological function of these features and ensure no future encroachment. Buffers have been proposed within the southern property limits in the northwest corner to the watercourse between the pond and the property limits and the southwestern corner between the woodland and transient trailer sites (Figure 4).

6.0 Legislation and Policy Compliance

6.1 Provincial Policy Statement

The Provincial Policy Statement was first issued May 22, 1996, and has been updated and reissued several times over the last 3 decades. Notably, clear protection of natural heritage features was not identified prior to the 2005 PPS. As a result, any site development that occurred prior to 2005 would not likely have constituted a violation to the PPS. Given the time that has passed, availability of the 1996 PPS, and changes in legislation, our review of compliance with the PPS has focused on impacts to features protected under the PPS since 2005, when language changes first identified that *“Development and site alteration shall not be permitted in: Significant Wetlands, south and east of the Canadian Shield; Significant Woodlands, Significant Valleylands, Significant Wildlife Habitat... unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological function”*. Language and policies in the current PPS (2024) have not changed and continue to provide policy direction on matters of provincial interest related to land use planning and development.

Most of the woodlands present on the subject lands in 2004 can be classified as significant as they are expected to meet most of the criteria under the Forestry Act, NHRM (2005), ELC system, and the County of Wellington Official Plan. The minor intrusions to the woodland in the vicinity of the small pond feature in order to allow for an expansion of the outdoor materials storage yard has resulted in the removal of 0.18ha of natural woodland, with several smaller minor intrusions to the woodland limit within the southwest limit of the property of 0.04ha, for a total woodland removal of 0.22ha, however, an increase of 0.24ha of woodland has been noted for the site since 2004, resulting in no net loss of significant woodlands and remaining consistent with the PPS.

6.2 Greenbelt Plan

As identified in Section 1, development or site alteration is not permitted within the Natural Heritage System of the Protected Countryside, however, several exceptions apply, including for recreational purposes, and existing uses. As shown in the assessment of the site's historic development, all recreational uses, site alteration and development on the site within the limits of the Greenbelt NHS were existing at the time of the Greenbelt Plan enactment. Therefore, the site development is considered in compliance with the Greenbelt Plan.

6.3 HCA Wetland Policies

Per Section 5.2 General policies (HCA, 2025):

- a) Development activities and interference within regulated areas are prohibited except in accordance with the policies of Sections 5.2 to 5.9.*
- b) Development activities and interference may be permitted in regulated areas where the activity is not likely to affect control of flooding, erosion, dynamic beaches or unstable soil or bedrock, or create conditions or circumstances that, in the event of a natural hazard, might jeopardize the health or safety of persons or result in the damage or destruction of property.*

Development: means the creation of a new lot, a change in land use, or the construction of buildings and structures requiring approval under the Planning Act, but does not include:

- a) activities that create or maintain infrastructure authorized under an environmental assessment process or identified in provincial standards; or*
- b) works subject to the Drainage Act.*

Development activity: means,

- a) the construction, reconstruction, erection or placing of a building or structure of any kind;*
- b) any change to a building or structure that would have the effect of altering the use or potential use of the building or structure, increasing the size of the building or structure or increasing the number of dwelling units in the building or structure;*

c) site grading; or

d) the temporary or permanent placing, dumping or removal of any material, originating on the site or elsewhere.

Based on our assessment of the subject lands any site alteration within the limits of the regulation area since 2004 have generally only included tree and vegetation removal, without any changes to the landscape or the erection of buildings or structures and would not constitute development or development activities within the regulation limit. No wetland removals have occurred, and while several sites and trailers are located within the regulation limit, none have encroached with the limits of the regulated features, and they are within the limits of the approved site plan. No changes to the alignment or functions of the watercourse are known to have occurred.

A minimum 5m buffer to the watercourse within the property limits has been recommended to ensure continued compliance with HCA policies (Figure 4).

6.4 Wellington County Official Plan

The Wellington County Official Plan (2025; Township of Puslinch – Schedule A7) identifies the subject property as containing Core Greenlands and Greenlands. Section 5.4 of the *Official Plan* (Section 5 – The Greenlands System) specifies that within the Greenlands System, areas with greater sensitivity or significance are identified and protected as Core Greenlands and include PSWs, all other wetlands, hazardous lands and habitat of endangered or threatened species and fish habitat.

As per Section 4.1.1, all woodland communities on the subject property meet the criteria for Significant Woodlands within Wellington County. As described in this report, approximately 0.22 ha of significant woodland was removed since the Greenbelt Plan was enacted in 2004.

As previously identified, woodlands have expanded and trees have been planted on site by the owner, resulting in an increase in woodland area within the subject lands by approximately 0.24ha since 2004, for a total overall increase of 0.02ha. In addition, the removals did not change the status or ecological functions of the significant woodland, based on the location of removals within a small peninsula of trees at the edge of the feature, and the composition of the feature as an eastern white cedar coniferous forest, with little to no understory vegetation, as a result, the removal is not considered a negative impact to the greater significant woodland.

6.5 Puslinch Township Zoning By-Law No. 19/85

Township of Puslinch Zoning By-Law No. 19/85 was in effect until January 2020, when the updated By-law 023—2018 came into effect. As discussed in section 1.2.2.1, Key map no. 6 (Image 2), lands zoned as ‘Hazard’ are present to the northeast of the existing volleyball courts,

and the immediate area adjacent to the southern pond and watercourse to the south of the rail line.

Section 20 (2) Uses Permitted notes that *'No Person Shall, within any H Zone, use any lot or any existing building or structure for any purpose except one or more of the following H uses, namely:*

- a) Agricultural use;*
- b) Forestry;*
- c) Fish and wildlife management;*
- d) A boathouse or boat doc;*
- e) Any public use.*

Per our review, no uses, buildings or structures appear to have occurred directly within the former H zone, that were not existing prior to enactment or approved within the Site Plan, as a result, all existing uses are expected to comply with the Puslinch Zoning Bylaw No. 19/85.

6.6 Puslinch Township Zoning By-law 023-2018

The Provincially significant wetlands are classified as the Natural Environmental (NE) Zone, as defined by the *Puslinch Township Zoning By-law 023-2018* (2018). The limit of the NE Zone follows the boundary of the Core Greenlands (as designated in the *Wellington County Official Plan*, 2025).

Section 4 (General Provisions), subsection 31 (Setbacks from the Natural Environmental Zone) of the *Zoning By-law* states that *"No buildings or structure, including a private sewage treatment system and associated tile weeping bed, shall be constructed closer than 30.0m (98.4 ft) from the limit of the Natural Environmental Zone."*

No buildings or structures have been erected within the current NE zone or the mapped Environmental Protection Overlay (Figures 2 & 3) that were not existing prior to the enactment of the current By-law, as a result, all existing development complies with the Puslinch Zoning Bylaw 023-2018.

7.0 Summary and Conclusions

It is the opinion of AA that the development of the Emerald Lake Resort at 7248 Gore Road has not resulted in negative impacts to the existing natural heritage features and is in compliance with the applicable policies and regulations that are applicable to the site, based on a review of historic site development through air photos, review of the approved site plan and the timing of policy enactment and development. As noted in above sections, minor site alteration within the Greenlands limits took place following the enactment of the Wellington County Official plan and involved minor removals of trees within a woodland. While more sites have been developed than was established in the original site plan, the overall limits of the trailer development are within the limits of the approved recreational area. Below is a summary of the identified Natural Heritage features and history of site development and policy enactment.

7.1 Natural Heritage Features

1. Significant Woodlands are present within the western boundary of the southern property and bisect the northern boundary.
2. The woodland features present within the subject lands meet the criteria for significance and are considered Greenlands through the Wellington County Official Plan (2025 consolidation) and significant woodlands the Provincial Planning Statement (2024).
3. Wetland features within the Fletcher Creek Swamp Provincially Significant Wetland Complex are present within the northern portion of the property, and adjacent to the subject property within the southern portion of the property.
4. A watercourse is present within the southern portion of the property, connecting to the smaller pond feature and travelling off site to the west.

7.2 Summary of site and policy development history

1. Site Plan approval occurred in January 1984, the entire southern portion of the property was approved as recreational, including up to 200 trailer sites, with the remainder of the site noted as recreational spaces for future development, no portion of the southern half of the site was not a planned recreational use. The northern portion of the site was partly recreational with the remainder hazard lands.
2. Zoning By-Law Amendment to allow additional recreational uses was approved (1994).
3. Substantial Site development, with cleared areas similar to current conditions, was completed between 1997 and 2004.
4. The Wellington County OP (1999) is in force.
5. The Greenbelt Plan (2004), PPS (2005) are in force.
6. Per Google Earth Historic Imagery, Tree Clearing within the southwestern woodland took place between 2009 and 2012.
7. Per ESRI Historic Imagery, minor tree clearing around the pond took place within the Greenland limits between February and March 2014.
8. Per Google Earth Historic Imagery, recreational uses were fully developed and concurrent with existing conditions by 2015.
9. The Wellington County Official Plan (2016 revision) are in force and in alignment with the Greenbelt Plan mapping.

7.3 Mitigation and additional work recommendations

1. Confirm the limits of wetland and woodland features with the HCA and Township representative.
2. As part of Site Plan Application, implement a native and site appropriate enhancement planting plan within the recommended areas of woodland and watercourse buffers to ensure long term protection of natural heritage features on site.
3. Ensure the future zoning considers the confirmed limits of natural heritage features and recreational features on site, including removal of the Core Greenland designation within the area south west of the pond per our assessment that a wetland feature was mis-identified in historic wetland delineations by the MNR and has never been present in this location based on a review of historic imagery and on site knowledge gathered through a site visit
4. Install native tree and shrub enhancement plantings along other woodland and wetland edges within the property, to mitigate future impacts from recreational use and discourage reactional uses within significant features.

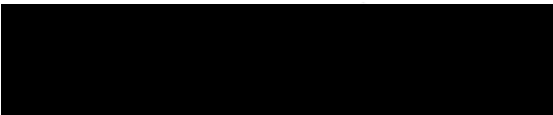
7.4 Legislation and Policy Compliance

1. The *Provincial Policy Statement (2024)* does not permit development or site alteration that negatively impacts Significant Woodlands, or Provincially Significant Wetlands. No negative impacts to significant woodlands or wetlands were identified as occurring following enactment of their protection under the PPS. Therefore, the site development is in compliance with the PPS.
2. The *Greenbelt Plan (2004)* allows for existing recreational uses within the limits of the Protected Countryside NHS. All development or site alteration within the NHS limits of the subject property have been demonstrated to have been present, considered minor expansions or recreational use, or occurred prior to the enactment of the Greenbelt plan.
3. *Ontario Regulation 41/24 and the regulation guidelines of the HCA* do not permit the development or development activities within regulated features or their allowances. Per our assessment, no development or development activities that are not considered existing uses have occurred and the site is in compliance with the Conservation authorities Act and the policies of the HCA
4. The *Wellington County Official Plan (2025)* identifies that development within Greenlands, and the adjacent lands is not permitted unless no negative impacts to the feature have been determined through a scoped EIS. Per our assessment, tree removals within the limits of Greenlands were considered negligible and are not considered a negative impact to the greater significant woodland, and the property development is therefore considered in compliance with the Official Plan.

5. The *Township of Puslinch Zoning By-law 023-2018* indicates that any buildings or structures development within the NE zone that was not included in the approved site plan and occurred after the current Zoning By-Law was in force, may need to demonstrate conformity with the zoning designations. No buildings or structures have been erected within the current NE zone or the mapped Environmental Protection Overlay (Figures 2 & 3) that were not existing prior to the enactment of the current By-law, as a result, all existing development complies with the Puslinch Zoning Bylaw 023-2018.

Prepared by:

ABOUD & ASSOCIATES INC.



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MNR Certified ELC & OWES

Reviewed By:



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Terrestrial & Wetland Ecologist
CERPIT #0499
OMNR Certified Ecological Land Classification
OMNR Certified Wetland Evaluation

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FIGURES

1954

1997

UAGI 3002 153.16

14 3 1 8

GORE ROAD

Town of Oakville, Microsoft, Vantor

LEGEND

PROJECT LOCATION

LIMIT OF APPROVED DEVELOPMENT

DESIGNATED LAND USES

HAZARD LANDS

RECREATION

RECREATION & TRAILERS

- Information Sources:
1. University of Toronto. [Air Photos of Southern Ontario 1954]. Retrieved February 20, 2026.
 2. Geospatial Ontario Imagery [Ontario Imagery Webmap Service] Retrieved February 23, 2026.
 3. Site Plan for Campsite Layout, Black, Shoemaker, Robertson & Donaldson- Revised January 12, 1990.

Title:
PROJECT LOCATION &
HISTORICAL CONDITIONS
1954 & 1997

Project:
EMERALD LAKE
TOWNSHIP OF PUSLINCH

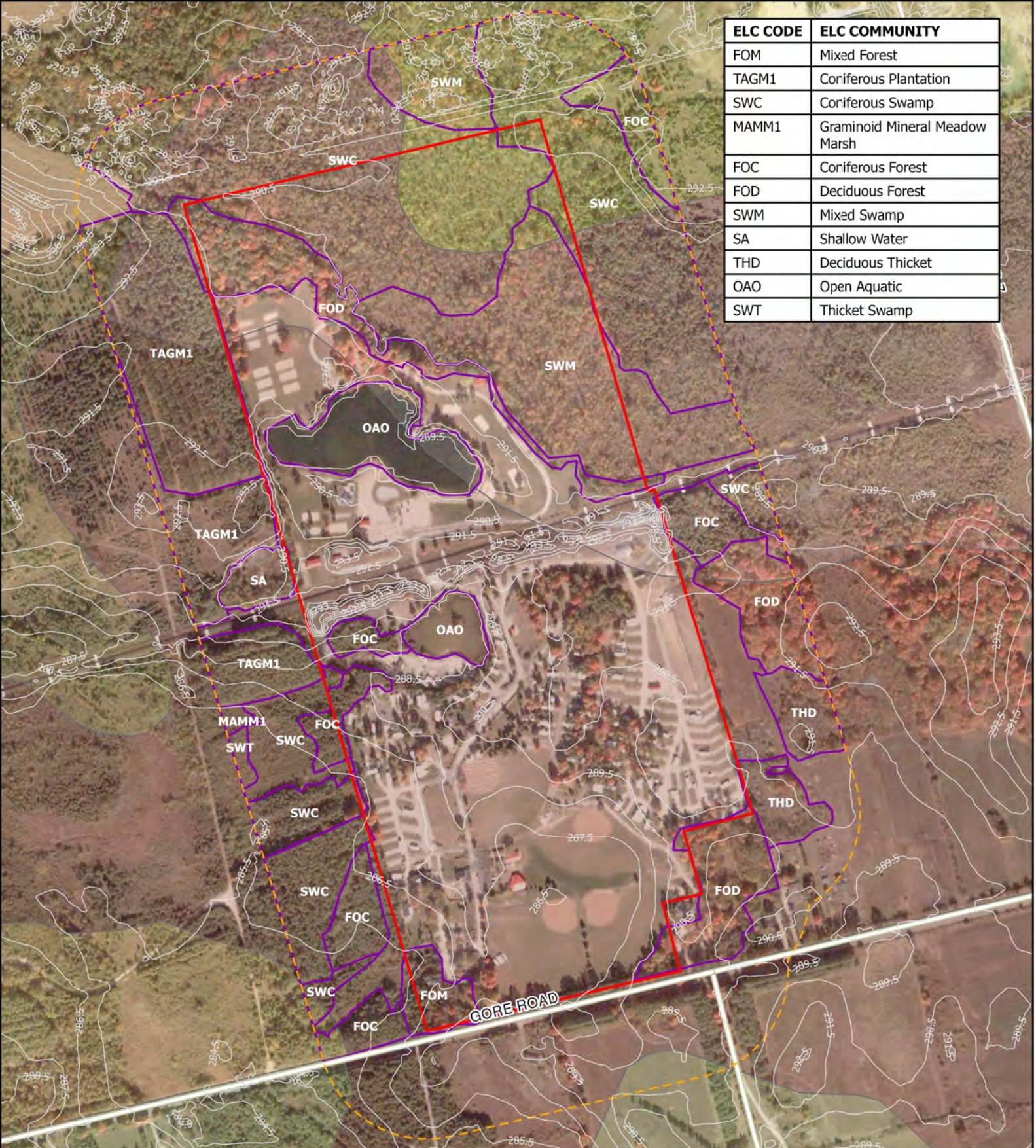


Date: MARCH 2026
Project: AA25-281A
Scale: 1 : 5500



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Figure No:
1a



ELC CODE	ELC COMMUNITY
FOM	Mixed Forest
TAGM1	Coniferous Plantation
SWC	Coniferous Swamp
MAMM1	Graminoid Mineral Meadow Marsh
FOC	Coniferous Forest
FOD	Deciduous Forest
SWM	Mixed Swamp
SA	Shallow Water
THD	Deciduous Thicket
OAO	Open Aquatic
SWT	Thicket Swamp

- LEGEND**
- PROJECT LOCATION
 - STUDY AREA
 - CONTOURS
 - DESKTOP ELC (2004)

- SOIL SURVEY OF ONTARIO**
- DONNYBROOK SANDY LOAM
 - DUMFRIES LOAM
 - DUMFRIES SANDY LOAM
 - FARMINGTON LOAM
 - GILFORD LOAM
 - MUCK



DATE: MARCH 2026

PROJECT #: AA25-281A

SCALE: 1:5,500



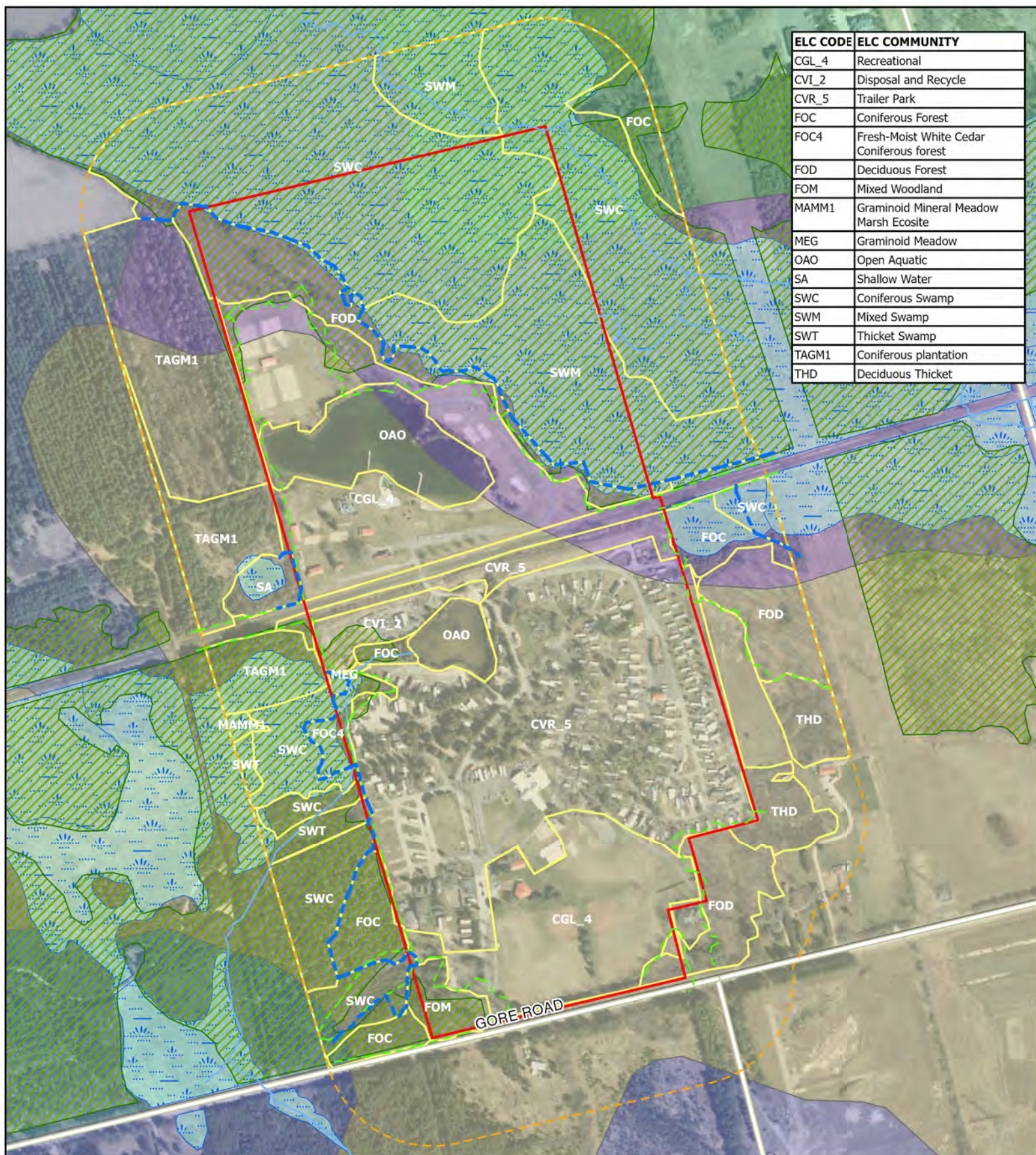
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TITLE: PROJECT LOCATION & HISTORICAL CONDITIONS (2004)

PROJECT: EMERALD LAKE TOWNSHIP OF PUSLINCH, ON

FIGURE NO: 1b

Information Sources:
1. Orthophotography: Google Earth, dated: November 2004.
2. Contours accessed through TRCA REST Server. Accessed February 13, 2026.
3. Soil Survey of Ontario & Wetlands accessed through GEO. Accessed March 27, 2026.



ELC CODE	ELC COMMUNITY
CGL_4	Recreational
CVI_2	Disposal and Recycle
CVR_5	Trailer Park
FOC	Coniferous Forest
FOC4	Fresh-Moist White Cedar Coniferous forest
FOD	Deciduous Forest
FOM	Mixed Woodland
MAMM1	Graminoid Mineral Meadow Marsh Ecosite
MEG	Graminoid Meadow
OAO	Open Aquatic
SA	Shallow Water
SWC	Coniferous Swamp
SWM	Mixed Swamp
SWT	Thicket Swamp
TAGM1	Coniferous plantation
THD	Deciduous Thicket

LEGEND

- PROJECT LOCATION
 - STUDY AREA
 - WATERCOURSE
 - WETLAND
 - SIGNIFICANT WOODED AREAS

- DESKTOP WETLAND LIMIT
 - DESKTOP WOODLAND LIMIT
 - DESKTOP ELC (2020)

SOIL SURVEY OF ONTARIO

 - DONNYBROOK SANDY LOAM
 - DUMFRIES LOAM
 - DUMFRIES SANDY LOAM
 - FARMINGTON LOAM
 - GILFORD LOAM
 - MUCK



LEGEND

PROJECT LOCATION

STUDY AREA

GREENBELT PLAN DESIGNATION

PROTECTED COUNTRYSIDE

NATURAL HERITAGE SYSTEM AREA

WELLINGTON COUNTY OFFICIAL PLAN

GREENLANDS

CORE GREENLANDS

TOWNSHIP OF PUSLINCH ZONING

ENVIRONMENTAL PROTECTION OVERLAY

NATURAL ENVIRONMENT ZONE

Information Sources:

1. Orthophotography: ESRI World Imagery, 2025, accessed April 2026.
2. Wetlands, Natural Heritage System Area & Greenbelt Designation accessed through GEO. Accessed April, 2026.
3. Greenlands & Core Greenlands provided by Wellington County. Accessed April, 2026.
4. Natural Environment Zone & Environmental Protection Overlay referenced from Explore Wellington mapping application. Accessed April, 2026.



DATE: APRIL 2026

PROJECT #: AA25-281A

SCALE: 1:5,500



ABOUT & ASSOCIATES INC.
 Consulting Arborists • Ecologists • Landscape Architects
 3-6 Sidbrough Road South, Guelph, Ontario, N1H 8N8, 519.822.4839 - www.aboudmg.com

TITLE: EXISTING POLICY MAPPING

PROJECT: EMERALD LAKE
 TOWNSHIP OF PUSLINCH, ON

FIGURE NO:
 2



SIGNIFICANT NATURAL FEATURE
REMOVAL = 0.22HA

SIGNIFICANT WOODLAND
EXPANSION = 0.24HA

LEGEND

PROJECT LOCATION
 STUDY AREA
 DESKTOP WOODLAND LIMIT

GREENBELT PLAN DESIGNATION

 NATURAL HERITAGE SYSTEM AREA

TOWNSHIP OF PUSLINCH ZONING

 ENVIRONMENTAL PROTECTION OVERLAY
 NATURAL ENVIRONMENT ZONE

WELLINGTON COUNTY OFFICIAL PLAN

 GREENLANDS
 CORE GREENLANDS

SIGNIFICANT NATURAL FEATURE CHANGES

 EXPANSION
 REMOVAL

DATE: APRIL 2026

PROJECT #: AA25-281A

SCALE: 1:4,500

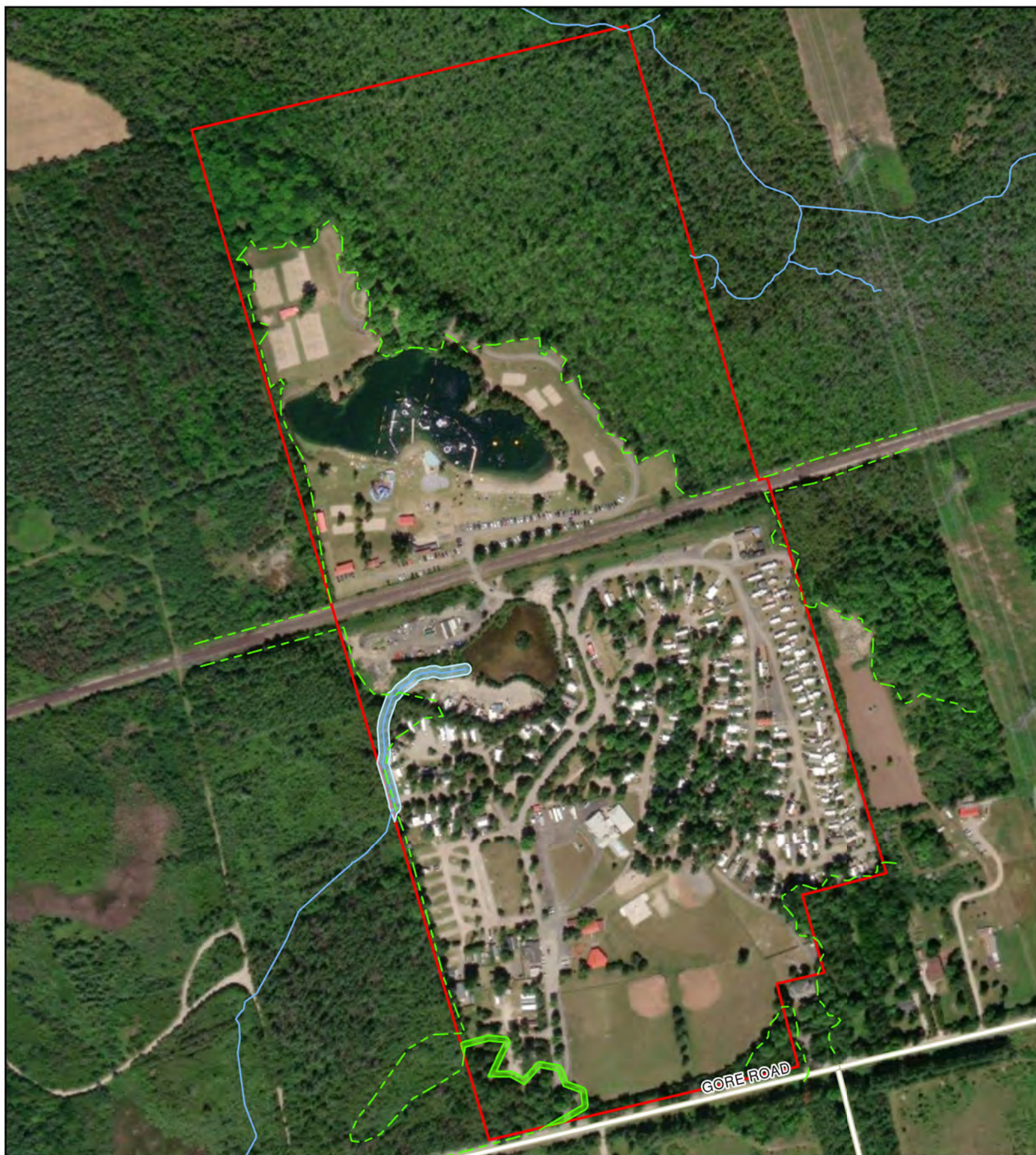
ABOUT & ASSOCIATES INC.
Consulting Arborists • Ecologists • Landscape Architects
3-6 Sidburn Road South, Guelph, Ontario N1H 9N8 • 519.822.8829 • www.aboutinc.com

TITLE: LOCATIONS OF SIGNIFICANT NATURAL
FEATURE REMOVAL & EXPANSION

PROJECT: EMERALD LAKE
TOWNSHIP OF PUSLINCH, ON

FIGURE NO: 3

Information Sources:
1. Orthophotography: ESRI World Imagery, 2025, accessed April 2026.
2. Wetlands accessed through GEO. Accessed April, 2026.
3. Greenlands & Core Greenlands provided by Wellington County. Accessed April, 2026.
4. Natural Environment Zone & Environmental Protection Overlay referenced from Explore Wellington mapping application. April 2026.



LEGEND

- PROJECT LOCATION
- DESKTOP WOODLAND LIMIT
- WATERCOURSE
- WATERCOURSE BUFFER (5M) & RESTORATION AREA
- WOODLAND BUFFER (5M) & RESTORATION AREA

Information Sources:
 1. Orthophotography: ESRI World Imagery, 2025, accessed March 2026.
 2. Watercourses provided by HCA, Accessed March 30, 2026.



DATE: MARCH 2026

PROJECT #: AA25-281A

SCALE: 1:4,500

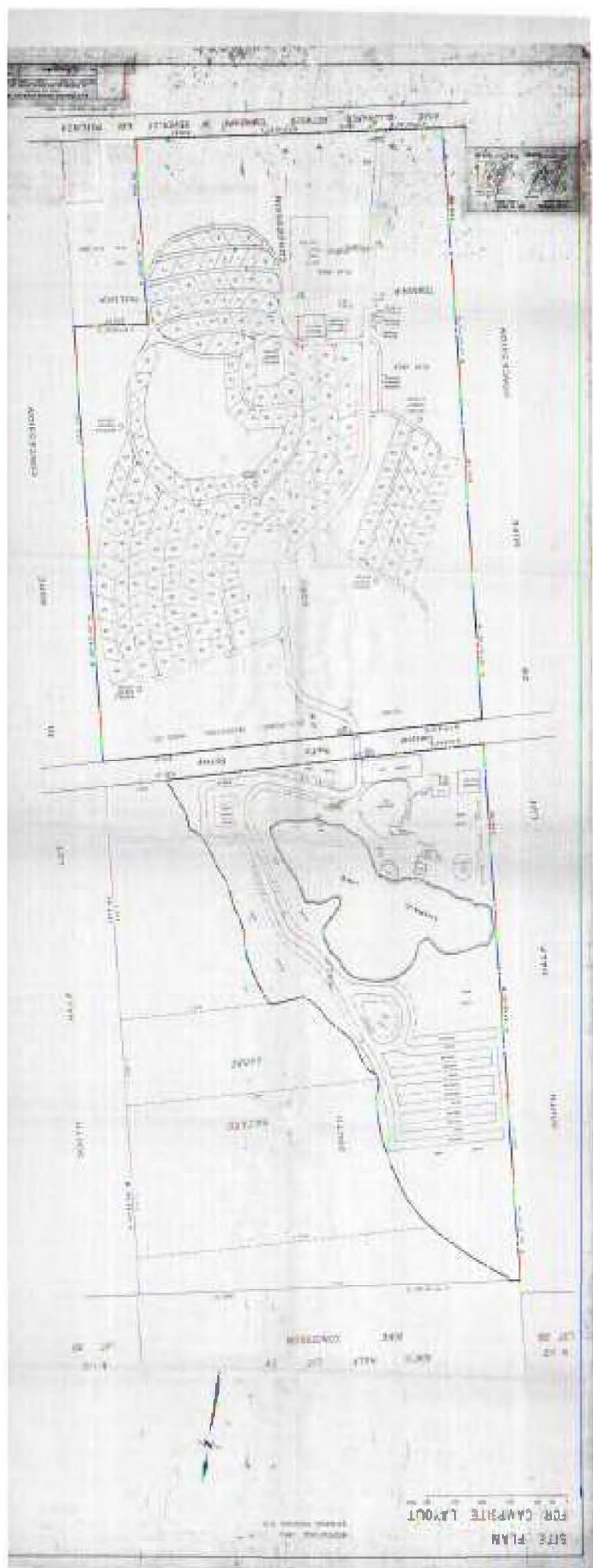


TITLE: RECOMMENDED BUFFERS & RESTORATION AREAS

PROJECT: EMERALD LAKE TOWNSHIP OF PUSLINCH, ON

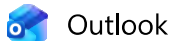
FIGURE NO:

4





APPENDIX 1
Terms of Reference and Approvals



Outlook

RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

From Monika Farncombe <mfarncombe@puslinch.ca>

Date Mon 3/30/2026 1:13 PM

To Cheryl-Anne Ross <cheryl@aboudtng.com>

Hello Cheryl-Anne,

I provided your comments below to NPG and Dougan and here was their response, I believe they are expecting a revise version with the changes below:

For **#15**,

Revised version suggested:

Impacts to natural heritage features and their ecological functions should be identified and described, including the type and extent of impact (e.g., encroachment, vegetation removal, alteration to hydrology, changes in ecological function, habitat loss, etc...). Where feasible, impacts should be quantified (e.g., area of feature affected, extent of encroachment into a feature or buffer, and/or changes in hydrologic conditions) and illustrated through mapping. The EIS should then outline mitigation, enhancement, and/or compensation measures that address each identified impact, with the goal of achieving an appropriate ecological outcome.

For **#16**, my suggestion of adding the ZBA has to do more with the “summary of recommendations” part, such as recommending a certain setback distance from the features or holding provision. I’ve reworded the suggestion as follows:

“Provide a summary of recommendations **for the Zoning By-law Amendment application** and any additional work to be completed as part of the future Site Plan Application, including confirmation of wetland and woodland limits within the site.”

For **#18**, the PPS was not identified under planning context, “consistency with the PPS” is required in the TOR. I’d also require the Puslinch Zoning By-law to be specifically mentioned since this is not a policy conformity issue.

Let me know if you have any follow up questions please. Thanks!



PUSLINCH
EST. 1850

Monika Farncombe

Planning and Corporate Services Coordinator

Township of Puslinch

7404 Wellington Rd 34, Puslinch ON N0B 2J0

519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Cheryl-Anne Ross <cheryl@aboudtng.com>

Sent: March 23, 2026 3:43 PM

To: Monika Farncombe <mfarncombe@puslinch.ca>

Subject: Re: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Thanks Monika,

In response to the NPG outstanding comments:

15. Our scope of expertise applies only to the impacts on the features' ecological functions and the ability to restore or compensate for those impacts; no other considerations for severity are within our purview. The identified edit introduces significant uncertainty in the assessment.

16. Since this EIS is being submitted as part of the zoning by-law amendment application, it would not be reasonable to note additional work to be completed as part of the zoning by-law amendment application.

18. *Policy conformity* identifies that we intend to show conformity with the applicable plans, which are all identified in the TOR under the planning context, including sections 4.31 and 13.2 of the zoning by-laws.

In response to Dougan comments:

Item 5 c and b is addressed under TOR item A. 4 and B. 12.

Is NPG requesting another TOR re-submission ?

Cheryl-Anne Ross
Partner . Ecology Lead . Wildlife Ecologist
519-822-6839 x 321

From: Monika Farncombe <mfarncombe@puslinch.ca>
Sent: Monday, March 23, 2026 2:12 PM
To: Cheryl-Anne Ross <cheryl@aboudtng.com>
Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hello Cheryl-Anne,

Please see attached 2nd submission comment summary for the above.

There are still some items from NPG to be addressed.

Thank you,



Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Monika Farncombe
Sent: March 10, 2026 10:33 AM
To: Cheryl-Anne Ross cheryl@aboudtng.com
Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Cheryl-Anne,

Just wanted to update that I asked for comments back on this by March 17th from Dougan, NPG and Hamilton CA. I will update you once I have any comments back.

Thank you,



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response

From: Cheryl-Anne Ross <cheryl@aboudtng.com>
Sent: Wednesday, February 25, 2026 11:23 AM
To: Monika Farncombe <mfarncombe@puslinch.ca>; Meagan Ferris <meaganf@wellington.ca>
Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>
Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Monika,

I've attached the revised Terms of Reference. Per comments from Dougan, a revised Terms of Reference was required to confirm that the comments had been addressed.

Thank you,

Cheryl-Anne Ross

Partner . Ecology Lead . Wildlife Ecologist

519-822-6839 x 321

From: Monika Farncombe <mfarncombe@puslinch.ca>

Sent: Monday, February 9, 2026 11:04 AM

To: Cheryl-Anne Ross <cheryl@aboutdng.com>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcpplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcpplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Cheryl-Anne,

I have updated the attached with HCA comments.

Thank you,



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Monika Farncombe

Sent: Friday, February 6, 2026 3:24 PM

To: 'Cheryl-Anne Ross' <cheryl@aboudtng.com>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Sure thing! See attached.

Happy Friday 😊



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Cheryl-Anne Ross <cheryl@aboudtng.com>

Sent: Friday, February 6, 2026 3:17 PM

To: Monika Farncombe <mfarncombe@puslinch.ca>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Monika,

If you could send along what you have so far, that would be appreciated. We can move ahead with the draft EIS and incorporate any HCA comments when they come in.

Thank you,

Cheryl-Anne Ross

Partner . Ecology Lead . Wildlife Ecologist

519-822-6839 x 321

From: Monika Farncombe <mfarncombe@puslinch.ca>

Sent: Friday, February 6, 2026 3:13 PM

To: Cheryl-Anne Ross <cheryl@aboudtng.com>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Cheryl-Anne,

I have both NPG and Dougans comments back, still waiting ON HCA. They have been historically more slow to get comments to us. Just wanted to know if you would like the summary now with HCA comments pending or would you like me to wait and send once it is complete?

Thank you,



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Monika Farncombe

Sent: Tuesday, February 3, 2026 3:10 PM

To: 'Cheryl-Anne Ross' <cheryl@aboudtng.com>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hello Cheryl-Anne,

Yes this has been sent to NPG, Dougan and Hamilton Conservation Authority for review. I have received comments back from NPG thus far. I will follow up with the others this week to see if they can finalize their comments by end of the week.

Thank you,



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Cheryl-Anne Ross <cheryl@aboudtng.com>

Sent: Tuesday, February 3, 2026 2:57 PM

To: Monika Farncombe <mfarncombe@puslinch.ca>; Meagan Ferris <meaganf@wellington.ca>

Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>; Ruth Snow | SnowCorp Accounting <ruth@snowcorpaccounting.com>; Drago Hasnas Emerald Lake <drago@emeraldlake.ca>; Trevor Hawkins <thawkins@mhbcplan.com>

Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Monika and Meagan,

Can you please confirm the Terms of Reference have been provided to the peer reviewers, and provide a date when we can expect a response regarding the proposed scope of work for the EIS?

Thank you,

Cheryl-Anne Ross B.Sc. F.W.T. (she/her/hers)

Partner . Ecology Lead. Wildlife Ecologist

MNRF Certified Ecological Land Classification

MNRF Certified Ontario Wetland Evaluation System

ABOUT & ASSOCIATES INC. 3-5 Edinburgh Road South . Guelph . Ontario . N1H 5N8

T : 519-822-6839 x 321 C : 226.789.9294 . www.aboudtng.com . cheryl@aboudtng.com

-
About & Associates Inc. is located within the Between the Lakes Purchase (Treaty 3); the treaty lands and territory of the Mississaugas of the Credit.

From: Jennifer Gaudet <jgaudet@mhbcplan.com>

Sent: Friday, January 23, 2026 1:40 PM

To: Cheryl-Anne Ross <cheryl@aboudtng.com>; Monika Farncombe <mfarncombe@puslinch.ca>

Subject: Re: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Monika,

Confirming the clients have approved third party fees.

JENNIFER GAUDET, BES, MCIP, RPP | Associate



540 Bingemans Centre Drive, Suite 200, Kitchener ON, N2B 3X9

C: (519) 476-4470



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From: Cheryl-Anne Ross <cheryl@aboudtng.com>
Sent: Tuesday, January 20, 2026 10:28 AM
To: Monika Farncombe <mfarncombe@puslinch.ca>
Cc: Jennifer Gaudet <jgaudet@mhbcplan.com>
Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Monika,

As discussed in the meeting, I believe it should be reviewed by the ecology peer reviewer (Dougan), but it likely makes sense to keep NPG in the loop.

I've looped in Jennifer from MHBC, as the Project Manager, to confirm the third-party costs with Drago and Ruth.

Thanks,

Cheryl-Anne Ross

Partner . Ecology Lead . Wildlife Ecologist

519-822-6839 x 321

From: Monika Farncombe <mfarncombe@puslinch.ca>
Sent: Tuesday, January 20, 2026 9:52 AM
To: Cheryl-Anne Ross <cheryl@aboudtng.com>
Subject: RE: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hi Cheryl-Anne,

Is the intention to have this peer reviewed by NPG as discussed in previous emails?

If so – I know Drago & Ruth agreed to the cost of the meeting with NPG that took place in November, however are they aware that third party costs apply to this review as well?

Thanks & hope you are well!



Monika Farncombe

Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
519-763-1226 ext. 207 Fax 519-736-5846 www.puslinch.ca

My hours may not match your working hours. If you received this email outside of regular business hours, I do not expect an immediate response.

From: Cheryl-Anne Ross <cheryl@aboudtng.com>
Sent: Tuesday, January 20, 2026 9:28 AM
To: Monika Farncombe <mfarncombe@puslinch.ca>; meaganf@wellington.ca
Cc: Jennifer Gaudet <jgaudet@mhbcpplan.com>; Trevor Hawkins <thawkins@mhbcpplan.com>; Denise Sharp <denise@aboudtng.com>
Subject: Terms of Reference - Emerald Lake ZBA, Scoped EIS

Hello Monika and Meagan,

Please see the attached proposed Terms of Reference to complete a Scoped EIS for the Emerald Lake ZBA application for distribution to the peer reviewers and HCA for review.

If you have any questions, please do not hesitate to reach out.

Cheryl-Anne Ross B.Sc. F.W.T. (she/her/hers)

Partner . Ecology Lead. Wildlife Ecologist

MNRF Certified Ecological Land Classification

MNRF Certified Ontario Wetland Evaluation System

ABOUD & ASSOCIATES INC. 3-5 Edinburgh Road South . Guelph . Ontario . N1H 5N8

T : 519-822-6839 x 321 C : 226.789.9294 . www.aboudtng.com . cheryl@aboudtng.com

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URBAN FORESTRY

ARBORIST REPORTS
MANAGEMENT PLANS
TREE PRESERVATION PLANS
TREE RISK ASSESSMENT
GIS TREE INVENTORIES
TREE APPRAISALS
MONITORING

ECOLOGICAL RESTORATION

NATURAL SYSTEMS DESIGN
HABITAT RESTORATION
EDGE MANAGEMENT PLANS
RAVINE STEWARDSHIP PLANS
NATURALIZATION PLANS
INTERPRETIVE DESIGN
MONITORING
CONTRACT ADMINISTRATION

ENVIRONMENTAL STUDIES

SUBWATERSHED STUDIES
ENVIRONMENTAL IMPACT
STATEMENTS
ECOLOGICAL LAND
CLASSIFICATION
WETLAND EVALUATION
VEGETATION ASSESSMENT
BOTANICAL INVENTORIES
WILDLIFE SURVEYS
MONITORING

LANDSCAPE ARCHITECTURE

MASTER PLANNING
RESIDENTIAL COMMUNITIES
COMMERCIAL/INDUSTRIAL
HEALTHCARE AND EDUCATION
STREETSCAPES
PARKS AND OPEN SPACES
TRAIL SYSTEMS
GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION

OLT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

February 25, 2026

Our Project No.: AA25-281A

Sent by email: mfarncombe@puslinch.ca
meaganf@wellington.ca

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

Meagan Ferris
Manager of Planning and Environment
Wellington County
74 Woolwich Street
Guelph ON N1H 3T9

**Re: Revised Terms of Reference for a Scoped EIS
Emerald Lake ZBA, Puslinch, Ontario**

Dear Ms. Farncombe & Ms. Ferris:

This document outlines the revised Terms of Reference (ToR) of the scoped Environmental Impact Study (EIS) to address the policy implications, if any, and potential impacts to natural heritage features as a result of the installation of 72 additional sites over the zoning maximum of 200 sites, which were added without Township approval on the Emerald Lake property located at 7248 Gore Rd in the Township of Puslinch. The Terms of Reference have been revised based on comments provided by the Township of Puslinch (7248 Gore Rd – EIS Peer Review – Comment Summary, received February 13, 2026). Please review the revised Terms and circulate to Hamilton Conservation Authority (HCA), Township of Puslinch Planning, and Wellington County staff for discussion and approval.

PROJECT UNDERSTANDING AND BACKGROUND

The proponent requires a scoped EIS that evaluates the potential natural heritage impacts that may have occurred on and adjacent to the property as a result of the expansion to the existing trailer park beyond the 200 sites permitted by the Zoning By-law.

Per the Site Chronology prepared by MHBC (December 9, 2025) development was initiated in January 1984 through an Official Plan amendment to redesignate lands from 'Rural' to 'Seasonal recreation' which included clauses that set a maximum of 200 sites and no tent camping.

In January 1994, a Zoning By-law amendment was approved which recognized recreational land uses that exist within the park and included a site-specific provision applying to the lands north of the railway to include additional permitted uses, including pools and water slides, mini golf, volleyball courts (which were identified as existing at that time), horseshoe pits, picnic shelters, and playgrounds, however, the limits of these designations are difficult to determine based on the mapping quality and scale. While the lands south of the railway were amended to include the concession stand for food sales, picnic shelters, variety store, laundromat, baseball diamonds and washrooms, which were existing at the time.

In December 2004, the Greenbelt Plan came into effect and lands within the subject property were designated as protected countryside with some areas along the western limit, to the north of the rail line and a small corner of the northeastern limit south of the rail line designated as areas within the Natural Heritage System. The County of Wellington Official Plan was brought into conformity with the Greenbelt Plan on December 19, 2014.

Based on our understanding of the above, the project requires the preparation of a scoped EIS that determines if the existing, as built, development was retroactively compliant with the policies that were applicable at the time of development based on a review of historic air photos and mapping, where available. Details of the proposed study and the required information are identified below.

STUDY AREA

The study area includes the subject lands (Figure 1) and adjacent lands up to 120 m where permission to access property is granted. As needed, the lands adjacent to the study area within the retained lands may require further access to assist with understanding the features and functions of natural heritage features. Lands outside of the study area and retained lands, where access is not granted, will be reviewed from existing background information (as outlined below).



Figure 1. Project Location & Study Area

BACKGROUND REVIEW

In preparing the Terms of Reference, the following sources were reviewed for background information:

- Aerial photography of the subject site,
- HCA Web-map of regulation limit,
- Conservation Authorities Act: Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits.
- County of Wellington Official Plan (2024 consolidation).
- Township of Centre Wellington Zoning By-law No. 2009-045 (2024 consolidation).
- NHIC Make-a-map, accessed December 3, 2025.

To augment the information collected from the background review, additional information will be requested from the following agencies:

- o MNR: Request information on wetlands, if present, appropriate timing windows for in-water works, and any incidental species observations available.
- o Conservation Authority: Request information regarding watercourses, wetlands and any available reports for the project Location. Any fees incurred for this data will be the responsibility of the proponent.

PLANNING CONTEXT

As part of the review, the following legislation will be considered, where it applies to natural heritage, to review the development timeline prepared by MHBC and identify if they were retroactively compliant with the policies that were applicable at the time of development based on a review of historic air photos and mapping.

Greenbelt Plan (2017)

The Greenbelt Plan identifies where urbanization should not occur in order to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape. Per Schedule 1 of the Greenbelt Plan, the entirety of the study area is identified as Protected Countryside, with several small areas within the Natural Heritage System. As such, the Greenbelt Plan applies to the proposal and an EIS is required to ensure compliance where development occurred after the Greenbelt Plan was in force.

Ontario Regulation 41/24- Prohibited Activities, Exemptions and Permits

Per the HCA Web-Map, the study area is partially within the Regulation Limit due to the presence of the Fletcher Creek Swamp Provincially Significant Wetland Complex, regulated watercourse and waterbodies, including Emerald Lake. As such, Ontario Regulation 41/24 applies to the subject lands, and the EIS is required to ensure compliance.

County of Wellington Official Plan (2024 consolidation)

Per the Official Plan, the study area contains Core Greenlands and Greenlands. Core Greenlands consist of areas which have greater sensitivity or significance including wetlands,

habitat of threatened or endangered species and hazardous lands. Greenlands consist of other significant natural heritage features including, but not limited to, areas of natural and scientific interest, streams, woodlands and environmentally sensitive areas. Per the Official Plan, where development is proposed within the Greenland system or on adjacent lands, the preparation of an Environmental Impact Study is required to ensure the requirements of the Official Plan are met where development occurred after the Greenbelt Plan was in force.

Township of Puslinch Comprehensive Zoning By-Law No. 023-18

According to the Township's Comprehensive Zoning By-Law Schedule A, portions of the subject property are currently zoned as Natural Environment (NE) and include Environmental Protection (EP) zone overlay. This is not a separate zone, but an overlay that represents natural heritage features included in the "Greenlands" designation of the County Official Plan, as well as lands to which HCA's regulations apply.

Section 4.31 Setbacks from the Natural Environment Zone states:

"No buildings or structures, including a private sewage treatment systems and associated tile weeping bed, shall be constructed closer than 30 metres from the limit of a Natural Environment (NE) Zone. Notwithstanding the required setback noted above or any other provision in this By-law to the contrary: Where a vacant lot existed on the day of passing of this By-law, a building permit may be issued for permitted buildings or structures, excluding new agricultural buildings and structures, provided that:

- 1) there is no other suitable location on the lot outside of the 30-metre minimum setback, and
- 2) a setback of at least three (3) metres from the NE Zone boundary is maintained.

Notwithstanding the above, the setback from the Natural Environment (NE) Zone may be reduced to a distance that is supported by the Conservation Authority having jurisdiction pursuant to its authority provided under the Conservation Authorities Act, R.S.O. 1990. Where the Conservation Authority provides written approval for a reduced setback from the NE Zone an amendment to this By-law shall not be required."

Section 13.2 Environmental Protection Zone Overlay states that:

"The EP overlay permits development of the lands within the EP overlay, subject to the following special provisions:

- Development will not be allowed in significant wildlife or plant habitat unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the habitat or its ecological functions.
- Development will not be allowed in significant woodlands unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the woodland or its ecological functions.
- Erection of a building or structure will not be allowed within an HCA regulated area unless written approval from the HCA is obtained.

PROPOSED TERMS OF REFERENCE

The following list is the proposed scope of work for the scoped Environmental Impact Study.

A. *Background Review*

1. Complete a review of all background policy and atlases and determine the significant natural heritage features on the property (NHIC, subwatershed studies).
2. Complete a historic aerial photo review to determine approximate timelines for development of the recreational areas and sites and how they relate to the applicable policies. While historical air photos are limited in this area, this review will include the following sources, at minimum:
 - i. Google. (n.d.). [Satellite images of Emerald Lake Resort, 2004,2012,2013,2015,2016,2017,2018,2019,2020,2023,2025]. *Google Earth Pro*. Retrieved February 20, 2026, from earth.google.com
 - ii. University of Toronto. [Air Photos of Southern Ontario 1954]. Retrieved February 13, 2026 from <https://mdl.library.utoronto.ca/collections/geospatial-data/air-photos-southern-ontario> Geospatial Ontario Imagery [Ontario Imagery Webmap Service] Retrieved February 23,2026 from <https://ws.lioservices.lrc.gov.on.ca>
 - iii. Geospatial Ontario imagery [Southern Ontario CIR-1994-2003-Stereo-NRG-40cm. Received February 19, 2026, from Geospatial Ontario imagery order.
 - iv. First Base Solutions. [Wellington County 2016, 2010]. Accessed February 23, 2026.
3. Complete an MNR Request for Information to access available information pertaining to the wetlands within and immediately adjacent the study area. This information will be reviewed to determine how wetlands were delineated, what criteria the wetland met to be considered provincially significant, and reviewed for the presence of sensitive features and community types that were identified in the study area, where information exists, as part of the assessment of potential impacts.
4. Review available Soils, Topography, Physiography, near infrared, wetland information, and groundwater Information as part of the desktop ELC, woodland and wetland boundary evaluation and air photo analysis for both the historic and current conditions, and identify discrepancies between the time periods, if any.

B. *Field Assessment*

5. Conduct one site visit, outside of the growing season, to identify the high-level vegetation communities present within and adjacent to the property using the ELC system (MNR), within the Study Area and, where possible, establish the approximate limits of any wetland features based on site topography and existing vegetation.
6. During the site visit review any areas where new development or encroachment appears to be present within natural heritage designated lands to identify impacts that may have affected the form and function of the natural features when they have occurred within the period that the regulations and policies are applicable.
7. Complete one site visit to review the limits of wetlands and woodlands and confirm with the HCA and Township, as applicable, during the growing season (May 1-August

31). This assessment will be completed as an addendum to the submitted scoped EIS as a confirmation of site conditions.

a. Scoped Environmental Impact Study Report

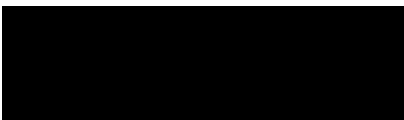
8. Summarize the Background Review prepared by MHBC and identify the applicable natural heritage policies that were in force at the time of the site development based on a review of historic air photos and documentation of site alteration from the client, where available.
9. Describe the methods of all field studies completed, and the industry standard protocol used to complete the field assessments, where applicable.
10. Describe the existing conditions of the study area, integrate the background information, and communication with appropriate agencies.
11. Summarize the requirements, if any, identified by the HCA, as applicable.
12. Analyze findings and prepare a minimum of two figures, one based on air photos and information available at the time of Site Plan approval or prior too, and one based on current air photos and legislation, which shows:
 - a. All natural features such as fish habitat, woodlands, wetlands, habitat for species at risk, and landscape level features.
 - b. The extent of the Natural Heritage System under the Greenbelt Plan, The extent of lands designated as Core Greenlands and Greenlands under the County Official Plan,
 - c. The extent of NE Zone (and the 30m buffer) and EP overlay under the Puslinch ZBL,
 - d. All hydrologically sensitive features such as permanent or intermittent streams, wetlands and seepage areas or springs,
 - e. The HCA Regulation Limit,
 - f. The existing development limits (locations of buildings, amenities, grading etc.),
 - g. The proposed zoning limits, per MHBC,
 - h. Desktop ELC vegetation communities, wetland limits and woodland limits,
 - i. 0-5m, Contours, from Hamilton Conservation Authority,
 - j. OMAFRA Soil Survey Complex,
 - k. Locations of candidate significant wildlife habitat and candidate species at risk habitat,
 - l. Other noteworthy features as needed,
 - m. Locations of other natural heritage features from background literature searches (e.g., mammal atlas, herpetofaunal atlas).
13. Conduct an impact assessment by reviewing the site alteration completed on site to date's direct, indirect, and induced (i.e., residual, ongoing) impacts on the natural features to the extent possible, based on the policy review, site visit and historic air photo review.
14. Determine the total area of impact to wetlands and total area of impact to woodlands protected under policies (i.e. Conservation Authorities Act, Greenbelt Plan, County Official Plan) that were in force at the time of development., if any, by comparing the current approximate area of woodland and wetland limits to air photo interpretation of leaf-off imagery taken prior to historic site alteration using the imagery and background sources identified in the Background Review.

15. Show the configuration of the existing development on the parcel and compare to the approved site plan limits and determine if work was completed outside of the approved limits of the plan and the estimated severity of the development where it occurred within the limits of a Natural Heritage Feature. Severity will be estimated based on the percent of the total feature impacted, type of impact and potential for complete restoration or compensation of the impact. Discuss difference in the limits of the existing to proposed plan, as they relate to limits of natural heritage feature, and if they constitute encroachment, dumping, introduction of invasive species and/or potential to alter changes to hydrology.
16. Provide a summary of recommendations and any additional work to be completed as part of the future Site Plan Application, including confirmation of wetland and woodland limits within the site.
17. Provide general recommendations for compensation, naturalization and buffers that may be needed to protect vegetation features (e.g., wetlands, regulation limits, woodlands) that have been impacted by the site alteration.
18. Provide a summary of key findings, policy conformity, recommendations for mitigation, and any SPA requirements of the County, HCA and Township.
19. Include a brief confidence and uncertainty statement outlining the reliability of inferred pre-development natural heritage feature limits, including identification of assumptions, data limitations, and areas where interpretation is constrained by the availability or quality of historic information.
20. Include a summary of possible cumulative effects in the context of the Fletcher Creek Swamp PSW complex, including how site-specific alterations may have interacted with or contributed to broader system level changes.
21. Prepare a report of the EIS that includes background information, methods, existing conditions, impact assessment, compensation and mitigation measures, and appendices of field studies.

We look forward to your response regarding these proposed terms of reference. If you require clarification, please do not hesitate to contact me.

Yours truly,

ABOUD & ASSOCIATES INC.



Cheryl-Anne Ross, B. Sc., F.W.T.
Ecology Lead & Wildlife Ecologist
MNR Certified Ecological Land Classification
MNR Certified Wetland Evaluation

7248 Gore Rd – EIS Peer Review – Comment Summary

Consultant	Comments
NPG Planning	A. Background Review – there is an existing Site Plan Agreement and approved Site Plan for the subject property. The EIS should refer to this as the general baseline for what is approved and their location. C. Scoped EIS Report: 8. Map should identify the extent of Natural Heritage System under the Greenbelt Plan, extent of lands designated as Core Greenlands and Greenlands under the County Official Plan and extent of NE Zone (and the 30m buffer) and EP overlay under the Puslinch ZBL. 11. ...compare to the approved draft site plan limits and determine if work was completed outside of the approved limits of the proposed approved plan. Discuss difference in the limits of the existing to proposed the approved plan, as they relate to limits of natural heritage feature. 12. ...any additional work to be completed as part of the Zoning By-law Amendment Application (if necessary) and the Site Plan Application... 14. Provide a summary of key findings, policy consistency with the PPS and conformity with the Greenbelt Plan and the County Official Plan, assessment of the proposal against Section 4.31 and 13.2 of the Puslinch Zoning By-law, recommendations for mitigation, and any SPA requirements of the County, HCA and Township.
Aboud & Associates	See attached letter
Hamilton Conservation Authority	Thank you for circulating the EIS terms of reference for 7248 Gore Road and my apologies for not getting back you last week. HCA staff have reviewed the terms of reference in accordance with HCA's plan

	review and regulatory responsibilities under the <i>Conservation Authorities Act</i>, which have been limited to matters that relate to natural hazards. As such, HCA is satisfied with the terms of reference and would defer any natural heritage review to the Township. The property at 7248 Gore Road is affected by Ontario Regulation 41/24 (Prohibited Activities, Exemptions, and Permits) made under the Conservation Authorities Act due to the presence the Fletcher Creek Swamp Provincially Significant Wetland Complex, Fletcher Creek and the potential flooding and the erosion hazards associated with these features. Consequently, written permission from the HCA will be required for any future development within the regulated area including construction, fill placement, and/or grading activities. Any new development should maintain a 30m setback to the wetland boundary and this setback should be clearly depicted on the site plan. We look forward to reviewing the Site Plan Application for the subject lands once submitted.
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3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

February 5, 2026

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

RE: 7248 Gore Rd (Emerald Lake) - Terms of Reference Review

Dear Monika,

Thank you for inviting Dougan Ecology to provide comments on the terms of reference (TOR) for an Environmental Impact Study (EIS) at 7248 Gore Rd (Emerald Lake). According to Wellington County Official Plan Schedule B7, the site is currently zoned as Recreational (Rural System), Core Greenlands and Greenlands (Greenlands System), and contains waterbodies and watercourses. The site also contains lands regulated by Hamilton Conservation Authority.

The applicant is looking to retroactively determine impacts of the creation of 72 sites (above the permitted 200 sites) which were developed without Township approval.

From an ecology perspective, the site contains or is adjacent to several natural heritage features which have potentially been impacted by the installation of the unpermitted sites. The applicant is proposing review of previous and current feature boundaries through use of historic aerial photos.

General Comments on approach and TOR:

1. In addition to historic aerial photography, the background review should include available soils mapping, physiographic mapping, and groundwater information to support characterization of pre-development natural heritage feature limits. Reliance on air photo interpretation alone may not adequately capture historic wetland extent, particularly for forested or seasonally saturated systems where hydrologic expression may not be visually apparent. Soils and groundwater information are also recognized indicators of wetland form and function and should be used to corroborate inferred feature boundaries.



2. The TOR notes review of watershed and subwatershed studies. Please clarify which watershed, subwatershed, or drainage studies will be reviewed and ensure that any historic or current management plans prepared at the County, Township, or Conservation Authority level are explicitly identified and included where relevant. These documents may provide important context regarding historic feature function, hydrologic regime, and management intent.

Our specific comments on the TOR are provided below:

1. **Item A.2:** A historic aerial photograph review is proposed to determine Natural Heritage feature boundaries prior to site installation. Please confirm which sources will be used for this review. High-quality aerial photographs for the site should be purchased for review where available.
2. **Item A.3:** The proposed request for information from MNRF regarding wetlands is acknowledged and supported. Given that many wetland evaluations in the area were completed in the 1980s, the TOR should clarify how historic OWES data will be interpreted, validated, or supplemented, and how discrepancies between historic evaluations and current conditions will be addressed in the analysis
3. **Item B.4:** One site visit outside of the growing season is proposed to confirm any ELC boundaries and feature boundaries where possible. An additional visit for confirmation of wetland boundaries must be completed following OWES protocols and completed within the appropriate growing season. Please add this to the scope of work.
4. **Item B.5:** It is noted that impacts to form and function of natural features will also be noted. Please clarify what impacts will be surveyed for and methods involved for determining level of severity (e.g. encroachment, dumping, invasive species introduction, changes in water balance etc.)
5. **Item C - EIS reporting: The TOR should acknowledge that EIS will address the following:**
 - a. Field Assessment (Clarification): Where soils, hydrology, or groundwater information indicates a reasonable likelihood of historic wetland conditions beyond those evident from aerial photography, the TOR should confirm that these lines of evidence will be integrated into interpretation of pre-development feature limits, even where on-site confirmation is constrained by seasonality or access limitations.
 - b. Scoped EIS Report (Clarification): Mapping and analysis should clearly document how soils, physiography, hydrology, historic wetland evaluations, and watershed studies were weighed alongside air photo interpretation when delineating inferred pre-development wetland and woodland limits. Any assumptions or limitations associated with these datasets should be explicitly stated.



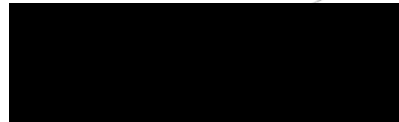
- c. The EIS should include a brief confidence and uncertainty statement outlining the reliability of inferred pre-development natural heritage feature limits, including identification of assumptions, data limitations, and areas where interpretation is constrained by the availability or quality of historic information. This is particularly important where conclusions are drawn from indirect or conflicting evidence and will assist reviewers in understanding the degree of certainty associated with the findings.
- d. The EIS should provide a brief discussion of cumulative effects in the context of the Fletcher Creek Swamp PSW complex, including how site-specific alterations may interact with or contribute to broader system-level changes. While the detailed impact assessment may remain site-focused, this contextual discussion will assist in evaluating potential implications for wetland function and policy conformity at the landscape scale.

Based on our review, the TOR should be revised to address the above comments.

Sincerely,



Summer Graham, BSc, Eco Mgmt Tech, ISA
Ecologist - Restoration



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





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URBAN FORESTRY

ARBORIST REPORTS
MANAGEMENT PLANS
TREE PRESERVATION PLANS
TREE RISK ASSESSMENT
GIS TREE INVENTORIES
TREE APPRAISALS
MONITORING

ECOLOGICAL RESTORATION

NATURAL SYSTEMS DESIGN
HABITAT RESTORATION
EDGE MANAGEMENT PLANS
RAVINE STEWARDSHIP PLANS
NATURALIZATION PLANS
INTERPRETIVE DESIGN
MONITORING
CONTRACT ADMINISTRATION

ENVIRONMENTAL STUDIES

SUBWATERSHED STUDIES
ENVIRONMENTAL IMPACT
STATEMENTS
ECOLOGICAL LAND
CLASSIFICATION
WETLAND EVALUATION
VEGETATION ASSESSMENT
BOTANICAL INVENTORIES
WILDLIFE SURVEYS
MONITORING

LANDSCAPE ARCHITECTURE

MASTER PLANNING
RESIDENTIAL COMMUNITIES
COMMERCIAL/INDUSTRIAL
HEALTHCARE AND EDUCATION
STREETSCAPES
PARKS AND OPEN SPACES
TRAIL SYSTEMS
GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION

OLT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

January 19, 2026

Our Project No.: AA25-281A

Sent by email: mfarncombe@puslinch.ca

meaganf@wellington.ca

Monika Farncombe

Planning and Corporate Services Coordinator

Township of Puslinch

7404 Wellington Rd 34

Puslinch ON N0B 2J0

&

Meagan Ferris

Manager of Planning and Environment

Wellington County

74 Woolwich Street

Guelph ON N1H 3T9

**Re: Terms of Reference for a Scoped EIS
Emerald Lake, Puslinch, Ontario**

Dear Ms. Farncombe & Ms. Ferris:

This document outlines the proposed Terms of Reference (ToR) of the scoped Environmental Impact Study (EIS) to address the policy implications, if any, and potential impacts to natural heritage features as a result of the installation of 72 additional sites over the zoning maximum of 200 sites, which were added without Township approval on the Emerald Lake property located at 7248 Gore Rd in the Township of Puslinch. Please review the Terms and circulate to Hamilton Conservation Authority (HCA), Township of Puslinch Planning, and Wellington County staff for discussion and approval.

PROJECT UNDERSTANDING AND BACKGROUND

The proponent requires a scoped EIS that evaluates the potential natural heritage impacts that may have occurred on and adjacent to the property as a result of the expansion to the existing trailer park beyond the 200 sites permitted by the Zoning By-law.

Per the Site Chronology prepared by MHBC (December 9, 2025) development was initiated in January 1984 through an Official Plan amendment to redesignate lands from 'Rural' to 'Seasonal recreation' which included clauses that set a maximum of 200 sites and no tent camping.

In January 1994, a Zoning By-law amendment was approved which recognized recreational land uses that exist within the park and included a site-specific provision applying to the lands north of the railway to include additional permitted uses, including pools and water slides, mini golf, volleyball courts (which were identified as existing at that time), horseshoe pits, picnic shelters, and playgrounds, however, the limits of these designations are difficult to determine based on the mapping quality and scale. While the lands south of the railway were amended to include the concession stand for food sales, picnic shelters, variety store, laundromat, baseball diamonds and washrooms, which were existing at the time.

In December 2004, the Greenbelt Plan came into effect and lands within the subject property were designated as protected countryside with some areas along the western limit, to the north of the rail line and a small corner of the northeastern limit south of the rail line designated as areas within the Natural Heritage System. The County of Wellington Official Plan was brought into conformity with the Greenbelt Plan on December 19, 2014.

Based on our understanding of the above, the project requires the preparation of a scoped EIS that determines if the existing, as built, development was retroactively compliant with the policies that were applicable at the time of development based on a review of historic air photos and mapping, where available. Details of the proposed study and the required information are identified below.

STUDY AREA

The study area includes the subject lands (Figure 1) and adjacent lands up to 120 m where permission to access property is granted. As needed, the lands adjacent to the study area within the retained lands may require further access to assist with understanding the features and functions of natural heritage features. Lands outside of the study area and retained lands, where access is not granted, will be reviewed from existing background information (as outlined below).



Figure 1. Project Location & Study Area

BACKGROUND REVIEW

In preparing the Terms of Reference, the following sources were reviewed for background information:

- Aerial photography of the subject site,
- HCA Web-map of regulation limit,
- Conservation Authorities Act: Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits.
- County of Wellington Official Plan (2024 consolidation).
- Township of Centre Wellington Zoning By-law No. 2009-045 (2024 consolidation).
- NHIC Make-a-map, accessed December 3, 2025.

To augment the information collected from the background review, additional information will be requested from the following agencies:

- o MNR: Request information on wetlands, if present, appropriate timing windows for in-water works, and any incidental species observations available.
- o Conservation Authority: Request information regarding watercourses, wetlands and any available reports for the project Location. Any fees incurred for this data will be the responsibility of the proponent.

PLANNING CONTEXT

As part of the review, the following legislation will be considered, where it applies to natural heritage, to review the development timeline prepared by MHBC and identify if they were retroactively compliant with the policies that were applicable at the time of development based on a review of historic air photos and mapping.

Greenbelt Plan (2017)

The Greenbelt Plan identifies where urbanization should not occur in order to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape. Per Schedule 1 of the Greenbelt Plan, the entirety of the study area is identified as Protected Countryside, with several small areas within the Natural Heritage System. As such, the Greenbelt Plan applies to the proposal and an EIS is required to ensure compliance.

Ontario Regulation 41/24- Prohibited Activities, Exemptions and Permits

Per the HCA Web-Map, the study area is partially within the Regulation Limit due to the presence of the Fletcher Creek Swamp Provincially Significant Wetland Complex, regulated watercourse and waterbodies, including Emerald Lake. As such, Ontario Regulation 41/24 applies to the subject lands, and the EIS is required to ensure compliance.

County of Wellington Official Plan (2024 consolidation)

Per the Official Plan, the study area contains Core Greenlands and Greenlands. Core Greenlands consist of areas which have greater sensitivity or significance including wetlands, habitat of threatened or endangered species and hazardous lands. Greenlands consist of other

significant natural heritage features including, but not limited to, areas of natural and scientific interest, streams, woodlands and environmentally sensitive areas. Per the Official Plan, where development is proposed within the Greenland system or on adjacent lands, the preparation of an Environmental Impact Study is required to ensure the requirements of the Official Plan are met.

Township of Puslinch Comprehensive Zoning By-Law No. 023-18

According to the Township's Comprehensive Zoning By-Law Schedule A, portions of the subject property are currently zoned as Natural Environment (NE) and include Environmental Protection (EP) zone overlay. This is not a separate zone, but an overlay that represents natural heritage features included in the "Greenlands" designation of the County Official Plan, as well as lands to which HCA's regulations apply.

Section 4.31 Setbacks from the Natural Environment Zone states:

"No buildings or structures, including a private sewage treatment systems and associated tile weeping bed, shall be constructed closer than 30 metres from the limit of a Natural Environment (NE) Zone. Notwithstanding the required setback noted above or any other provision in this By-law to the contrary: Where a vacant lot existed on the day of passing of this By-law, a building permit may be issued for permitted buildings or structures, excluding new agricultural buildings and structures, provided that:

- 1) there is no other suitable location on the lot outside of the 30-metre minimum setback, and
- 2) a setback of at least three (3) metres from the NE Zone boundary is maintained.

Notwithstanding the above, the setback from the Natural Environment (NE) Zone may be reduced to a distance that is supported by the Conservation Authority having jurisdiction pursuant to its authority provided under the Conservation Authorities Act, R.S.O. 1990. Where the Conservation Authority provides written approval for a reduced setback from the NE Zone an amendment to this By-law shall not be required."

Section 13.2 Environmental Protection Zone Overlay states that:

"The EP overlay permits development of the lands within the EP overlay, subject to the following special provisions:

- Development will not be allowed in significant wildlife or plant habitat unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the habitat or its ecological functions.
- Development will not be allowed in significant woodlands unless it has been demonstrated to the satisfaction of the Township that there will be no negative impacts on the woodland or its ecological functions.
- Erection of a building or structure will not be allowed within an HCA regulated area unless written approval from the HCA is obtained.

PROPOSED TERMS OF REFERENCE

The following list is the proposed scope of work for the scoped Environmental Impact Study.

A. Background Review

1. Complete a review of all background policy and atlases and determine the significant natural heritage features on the property (NHIC, subwatershed studies).
2. Complete a historic aerial photo review to determine approximate timelines for development of the recreational areas and sites and how they relate to the applicable policies.
3. Complete an MNR Request for Information to access available information pertaining to the wetlands within and immediately adjacent the study area.

B. Field Assessment

4. Conduct one site visit, outside of the growing season, to identify the high-level vegetation communities present within and adjacent to the property using the ELC system (MNRF), within the Study Area and, where possible, establish the approximate limits of any wetland features based on site topography and existing vegetation.
5. During the site visit review any areas where new development or encroachment appears to be present within natural heritage designated lands to identify impacts that may have affected the form and function of the natural features when they have occurred within the period that the regulations and policies are applicable.

C. Scoped Environmental Impact Study Report

6. Summarize the Background Review prepared by MHBC and identify the applicable natural heritage Policies that were in force at the time of the site development based on a review of historic air photos and documentation of site alteration from the client, where available.
7. Describe the methods of all field studies completed, and the industry standard protocol used to complete the field assessments, where applicable.
 - i. Describe the existing conditions of the study area, integrate the background information, and communication with appropriate agencies.
 - ii. Summarize the requirements, if any, identified by the HCA, as applicable.
8. Analyze findings and prepare a map, based on the background review, which shows:
 - a. All natural features such as fish habitat, woodlands, wetlands, habitat for species at risk, and landscape level features.
 - b. All hydrologically sensitive features such as permanent or intermittent streams, wetlands and seepage areas or springs,
 - c. The HCA Regulation Limit,
 - d. The existing development limits (locations of buildings, amenities, grading etc.),
 - e. The proposed zoning limits, per MHBC,
 - f. Desktop ELC vegetation communities,
 - g. Locations of significant wildlife habitat and candidate species at risk habitat,
 - h. Other noteworthy features as needed,

- i. Locations of other natural heritage features from background literature searches (e.g., mammal atlas, herpetofaunal atlas).
9. Conduct an impact assessment by reviewing the site alteration completed on site to date's direct, indirect, and induced (i.e., residual, ongoing) impacts on the natural features to the extent possible, based on the policy review, site visit and historic air photo review.
10. Determine the total area of impact to wetlands and total area of impact to woodlands protected under policies (i.e. Conservation Authorities Act, Greenbelt Plan, County Official Plan) that were in force at the time of development., if any, by comparing the current approximate area of woodland and wetland limits to air photo interpretation of leaf-off imagery taken prior to historic site alteration.
11. Show the configuration of the existing development on the parcel and compare to the approved draft plan limits and determine if work was completed outside of the approved limits of the proposed plan. Discuss difference in the limits of the existing to proposed plan, as they relate to limits of natural heritage feature.
12. Provide a summary of recommendations and any additional work to be completed as part of the Site Plan Application, including confirmation of wetland and woodland limits within the site.
13. Provide general recommendations for compensation, naturalization and buffers that may be needed to protect vegetation features (e.g., wetlands, regulation limits, woodlands) that have been impacted by the site alteration.
14. Provide a summary of key findings, policy conformity, recommendations for mitigation, and any SPA requirements of the County, HCA and Township.
15. Prepare a report of the EIS that includes background information, methods, existing conditions, impact assessment, compensation and mitigation measures, and appendices of field studies.

We look forward to your response regarding these proposed terms of reference. If you require clarification, please do not hesitate to contact me.

Yours truly,

ABOUD & ASSOCIATES INC.


Cheryl-Anne Ross, B. SC., F.W.T.
Ecology Lead & Wildlife Ecologist
MNR Certified Ecological Land Classification
MNR Certified Wetland Evaluation

Type text here

- Urban Forestry
- Ecological Restoration
- Landscape Architecture
- Environmental Studies
- Expert Opinion

February 6, 2026

Attention: Jennifer Gaudet, BES, MCIP, RPP

MHBC Planning
540 Bingham Centre Drive, Suite 200
Kitchener ON, N2B 3X9

SLR Project No.: 241.032598.00001

Revision: A

**RE: Environmental Noise and Vibration Letter
Emerald Lake Trailer Resort and Waterpark, Puslinch**

1.0 Introduction

At the request of MHBC Planning on behalf of Emerald Lake Inc., SLR Consulting (Canada) Ltd. (SLR) has prepared this environmental noise opinion letter for the Zoning By-Law Application (ZBA) at 7248 Gore Road in the Town of Puslinch, Ontario, also known as Emerald Lake Trailer Resort and Waterpark (Project site).

MHBC is working with Emerald Lake Inc., considering changes to their existing development at Emerald Lake Trailer Resort and Waterpark which requires a Zoning By-law Amendment application (ZBA). The Township of Puslinch has provided future planning application requirements which include the following note related to acoustics/vibration:

“The travel trailer park is in proximity to a railway. Depending on the location and nature of the proposed uses, a Noise and Vibration study may be required.”

The Project site is located on the north side of Gore Road in Puslinch, Ontario and is currently occupied by a baseball diamond and surrounded by a campground.

2.0 Assessment of Potential Transportation Noise and Vibration Impacts

2.1 MECP NPC-300 Guidelines

Sources with the potential to impact the Project site include Gore Road to the south and the Canadian Pacific Kansas City (CPKC) Galt Subdivision railways corridor to the north.

The Ministry of the Environment, Conservation and Parks (MECP) Publication NPC-300 Guidelines provide sound level limits/criteria for assessing potential roadway and railway impacts for land-use planning decisions.

The Project site at 7248 Gore Road would fall under the definition of a campsite or campground in MECP NPC-300, which is “a portion of property used for camping at which overnight accommodation is provided by, or on behalf of a public agency, or as part of a commercial operation.”.

The temporary trailer sites are not considered “noise sensitive commercial purpose buildings” which are defined “as a building used for a commercial purpose that includes one or more habitable rooms used as sleeping facilities such as a hotel and a motel.

An individual campsite (tent/trailer site) does not contain a permanent noise-sensitive building or a defined outdoor living areas (OLA) tied to a dwelling, and occupancy is transient/seasonal.

Based on the above definitions, the Project site is not considered a noise-sensitive receptor for transportation noise within NPC-300’s land-use planning framework; therefore no assessment of roadway or railway noise is required.

2.2 FCM/RAC Guidelines

The Federation of Canadian Municipalities and the Railway Association of Canada (FCM/RAC) also provides “Guidelines for New Developments in Proximity to Railway Operations” which recommends an assessment of noise from principal main lines within 300m of the tracks for new residential developments.

Similar to the MECP NPC-300 guidelines, FCM/RAC does not specify requirements for camp sites/campgrounds as noise-sensitive receptors for assessing transportation related noise (specifically from railways).

2.3 Vibration Assessment

The FCM/RAC Guidelines recommends conducting a vibration assessment for structures within 75m of a railway line. As there are no permanent structures located within 75m of the CPKC Subdivision, an assessment is not required.

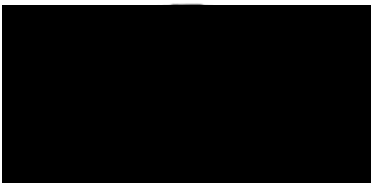
3.0 Closure

The letter has qualified the potential for noise and vibration emission from transportation sources. The Project site is anticipated to be compatible with the surrounding land uses from an environmental noise and vibration perspective.

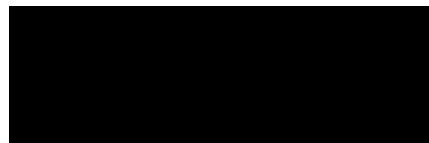
Should you have any questions or concerns, please do not hesitate to contact us.

Regards,

SLR Consulting (Canada) Ltd.



Dylan Diebolt, B.Sc.
Acoustics Consultant
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Jason Dorssers, P.Eng.
Acoustics Engineer
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Statement of Limitations

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April 19, 2026

MHBC Planning, Urban Design and Landscape Architecture
Suite 200 540 Bingemans Ctr Dr
Kitchener ON N2B 3X9

Attention: Jennifer Gaudet (via email: jgaudet@mhbcplan.com)

RE: Nitrates Impact on Groundwater, Emerald Lake Sewage Works

Clearford Waterworks Inc. (**Clearford**) was retained by Emerald Lake (the **Owner**) to prepare a memorandum discussing the impact of nitrates generated by the existing, onsite sewage works at the Emerald Lake Trailer Resort and Water Park (the **Site**).

The Site collects and treats wastewater generated by guests and users of the amenities through two (2) separate onsite systems, both discharging to shallow ground water receivers. The smaller onsite system is a Class 4 system located on the north side of the property across the rail line near to the lake. This system provides no additional treatment (no advanced treatment unit or **ATU**) prior to discharge to the sub surface disposal bed,

The larger onsite system consists of primary tanks followed by a Waterloo Biofilter (**WBF**) trickling filter treatment system which incorporates a denitrifying stage in the treatment process. Treated effluent is discharged from the WBF to an effluent holding tank and two (2) shallow buried trench (**SBT**) disposal beds.

The systems are approved and operated under Environmental Compliance Approval (**ECA**) no. 6567-8GBPBV issued by the Ministry of the Environment, Conservation and Parks (**MECP**) in March 2012. The ECA does not place effluent concentration or loading limits on the WBF system; however, condition 6.1 and Table 3 on page 7 of the ECA provide effluent objectives – 10 mg/L cBOD₅, 10 mg/L TSS and 5 mg/L NO₃.

The use of objectives allows for operation of the system using best practices and at reasonable costs to try and meet the values; however, there is no direct penalty for not meeting these figures. The MECP reserves the right to reopen the ECA any any time, and set compliance limits, should there be significant operating issues or observed downstream impacts in the receiving water.

Groundwater Monitoring

Condition 5.3 and Table 2 in the ECA place a requirement to install monitoring wells (**MWs**) and monitor the upgradient (one MW) and downgradient (two MWs) groundwater quality. The monitoring program requires sampling of each MW at the same frequency as the treated effluent, and samples are to be analyzed for cBOD₅, TP, TKN, NO₂, NO₃, *e. coli*., and pH.

Prior to the 2012 ECA the systems operated under an older approval which incorporated a number of additional MWs.

Treatment System

The WBF system is a passive treatment approach – there is limited ability for process adjustment, and the process operates by allowing primary (settled) effluent to slowly pass through a media bed (trickle feed) where it contacts biomass which provide treatment.

The biological process relies on the development of suitable populations of specialized bacteria to provide nutrient removal, with the processes establishing in a specific order – carbonaceous removal, ammonification-nitrification, and finally denitrification.

Each of these steps requires time to develop and acclimate the biomass, and the nitrification process biomass is very susceptible to changes in pH, temperature and loading. This sensitivity makes it challenging to establish reliable performance in the early season (May through early July) due to the non-continuous feed flow and lower temperature water.

Once nitrification is stable, the denitrification process biomass will start to form more robust populations as the feed to that stage of the treatment system becomes more consistent.

Disposal System

The two (2) disposal bed areas on the site differ in design and operation.

The Class 4 system near the water park operates in a manner that nitrification and any denitrification will mainly occur within the soil substrate of the bed itself, and not in the primary tank that collects and settles the wastewater.

The two (2) SBT sections that follow the WBF system are designed to provide pressurized disposal of the treated effluent. Each SBT system is comprised of parallel, linear runs of pressurized piping. The piping is designed to distribute the flow evenly along the length of the pipe, and the shallow burial depth is provided to enhance water and nutrient uptake by root systems above and around the SBT.

Effluent Quality

Effluent from the Class 4 system is not required to be sampled. There is no historic data to review for impacts to the groundwater.

BKL Engineering, the designer of the systems, provided a review of the expected and historic performance and nitrate dilution calculations in 2011. The BKL review noted three (3) specific findings,

- Historic data (up to 2011) for the MWs consistently showed no significant adverse impact on the deep and shallow aquifer
- The MW data was deemed supportive of the enhanced nutrient removal via SBT (nitrate reduction), and,
- Dilution calculations prepared for the Class 4 system, using very conservative assumptions, derived a maximum increase of 0.37 mg/l as NO₃ during peak loading season.

Effluent from the WBF system is sampled in accordance with condition 5.2 and Table 1 in the ECA, with four (4) samples collected per year. The sampling program consists of grab samples from the effluent dosing tank that feeds the SBTs, with one (1) sample collected in May, July, August and October each year.

Table 1 presents the analytical results for the four (4) annual samples collected over the past eight (8) years.

TABLE 1 EFFLUENT NITRATE CONCENTRATION, MILLIGRAMS PER LITRE

Year	May	July	August	October
2018	25.4	22.8	14.2	19.7
2019	39.8	58.5	55	48.3
2020	42.4	31.5	31.7	24.8
2021	53.1	40.2	23.1	53.9
2022	-	-	-	25.4
2023	28.7	0.1	3.91	36.3
2024	41.6	21.5	15.2	20.1
2025	4.54	63.8	-	3.04

The data presented in Table 1 illustrates one of the challenges seasonal resorts often see – effective denitrification is rarely achieved due to the limitations of the biological processes. The progression is generally consistent year to year, with limited to no denitrification in the first two (2) samples, and the latter two (2) samples showing a gradual improvement.

The trend follows conditions at the site,

- Early season (May through June) is characterized by generally low flows during the week, and high flows on weekends when the site is occupied. This situation leads to inconsistent feed to the biological processes, and the wastewater will also cool as it sits longer in primary tanks, leading to lower biological activity

- ### Groundwater Impact

Subsequent to the issuing of the current ECA only three (3) MWs, established in the shallow aquifer, remained operational. The locations are shown in Figure 1.



FIGURE 1 MONITORING WELL LOCATION MAP.

In Figure 1 MW1 (right side, near to road) is the far field downgradient well, MW2 (right centre) is the near field downgradient well adjacent to the SBT beds, and MW3 (centre, adjacent to pavilion/hall) is the upgradient well.

The samples collected from the MWs from 2012 through present show a few consistent trends,

- The shallow aquifer generally produces enough flow for the MWs to provide a sample of sufficient volume to analyze in the early season samples
- In later months, as the temperature increases and rainfall decreases, the MWs downgradient of the SBT do not produce enough volume to obtain a representative sample volume. The upgradient well is often 'dry' during this time period, too, and,
- The low volume in the aquifer suggests the discharge to the SBT is rapidly assimilated in the soils and the shallow water source provides irrigation to vegetation on and immediately around the SBT.

A review of annual performance reports for the WBF system from 2005 through 2025 provided consistent analysis of the impact on the groundwater quality,

- The MWs were predominantly dry during the peak operating season, making collection of representative samples difficult, and,
- The samples that were collected consistently showed very low concentration of nitrate downgradient of the SBT.

The conclusion in each report was that the onsite systems had a negligible impact on the groundwater quality as a result of the significant nutrient uptake near to and immediately downstream of the SBTs.

Tables 2, 3 and 4 present the nitrate concentration in mg/L measured in groundwater samples from the MWs from 2018 through 2025.

The data presented in Tables 2, 3 and 4 illustrate two (2) key points,

- The shallow aquifer expected to be impacted by the discharge of effluent from the onsite sewage works dries up during the warmer, peak occupancy months. This suggests the discharge from the Class 4 system and the SBTs is assimilated and used up on site rather than traversing the site to the property boundary, and,
- The data points from months it was possible to collect samples shows no adverse impact on the groundwater quality adjacent to the downgradient property boundary, with the

measured concentration of nitrate nitrogen well below the *reasonable use guideline* limit of 2.5 mg/l at the property edge.

Year	May	July	August	October
2018	-	-	-	-
2019	0.01	-	-	-
2020	0.01	-	-	-
2021	0.01	-	-	0.77
2022	0.01	-	-	-
2023	0.01	-	-	-
2024	-	-	-	-
2025	-	-	-	-

TABLE 2 MW1 (FAR FIELD DOWNSTREAM) NITRATE CONCENTRATION

Year	May	July	August	October
2018	2.54	-	31.4	13.2
2019	3.25	-	-	-
2020	-	-	-	-
2021	-	-	19.1	-
2022	4.76	-	-	-
2023	7.58	15.3	7.77	-
2024	-	12	-	-
2025	7.41	-	-	-

TABLE 3 MW2 (ADJACENT TO SBT, DOWNSTREAM) NITRATE CONCENTRATION

Year	May	July	August	October
2018	0.13	-	0.13	0.1
2019	0.4	-	-	-
2020	1.78	-	1.32	-
2021	0.1	0.35	0.81	0.14
2022	0.01	-	-	-
2023	0.25	0.25	0.42	-
2024	0.29	0.11	-	-
2025	0.96	0.53	-	-

TABLE 4 MW3 (UPSTREAM) NITRATE CONCENTRATION.

Summary

The evaluation of the treatment provided by the onsite systems at the Site showed elevated concentrations of nitrate nitrogen, exceeding the effluent objective in the ECA. However, a review of historic annual reports for the systems, and a review of recent samples of groundwater collected

from MWs on the Site, showed there was no observed or expected adverse impact on the groundwater quality at the downgradient property boundary.

The reported performance figures, and assessment of impact, reflects the findings of the 2011 assessment completed by BKL Engineering in support of the amended ECA – *the use of the SBT disposal system promotes uptake and beneficial reuse of nitrate and other nutrients by the root system, reducing the impact of nitrates to the shallow groundwater receiver.*

Should you have any questions, please feel free to contact me for additional information.

Regards,



John Levie, P.Eng., M.Eng.

Vice President, Engineering
Clearford

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Appendices

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1.0 INTRODUCTION

A proposed reconciliation for Emerald Lake (**the site**) is required to adjust descriptions in various approvals and documents to align with current site conditions and configuration. This report focuses on the sanitary servicing design for the site, including the water park, event hall and associated buildings. The adjustments are necessary to address the number of recreational vehicle (**RV**), rough camping (**tent**), cabins and ancillary serviced structures presently on the site as align with the figures provided in current zoning bylaws, site plan agreement(s) and environmental permits.

Storm water management and related infrastructure are not covered under the scope of the present review and updated servicing report.

Emerald Lake Trailer Resort and Water Park (the **Owner**) have retained Clearford Waterworks (**Clearford**), a division of Clearford Water Systems Inc., to prepare an updated functional servicing report (**FSR**) for the as constructed site to support both the amendment to the current Environmental Compliance Approval (**ECA**) and ongoing Zoning By-law Amendment (**ZBA**) process.

The site – presently consisting of the park offices, outdoor recreation areas, the water park and related facilities, and the serviced and un-serviced sites - is located at 7248 Gore Rd. in Puslinch, Ontario. The site is presently provided with on-site water and wastewater systems for sanitary servicing.

Potable water for seasonal residents and guests of the site is provided by a number of discrete on-site water supply wells and *water treatment systems (WTS)*. One (1) WTS is located in the office building to provide water to most areas on the site. A second WTS located in the concession stand at the water park provides water only to that building, and a third WTS located in the banquet hall provides water only to that building.

There are two (2) discrete *wastewater treatment systems (WWTS)* on the site – one (1) Waterloo Biofilter (**WBF**) packaged treatment system rated for a *maximum daily flow (MDF)* of 49,200 litres per day (**l/d**) or 49.2 cubic metres per day (**m³/d**). A second, smaller Class IV septic system services the water park field washrooms and concession building, and has a **MDF** of 5,065 l/d or just over 5 m³/d.

1.1 Background

The serviced areas and major features of the site are shown in the aerial view in Figure 1. The site is opened and operated on a seasonal basis, with start up no earlier than May 1 and shut down by October 31 each calendar year for a total of 183 operating days per year.

The property is approximately 19.4 ha (48 acres) in area and consists of two (2) parcels, described as part of the south half lot 29 Gore Concession in the Township of Puslinch. Rail tracks – *Canadian Pacific Kansas City (CPKC)* – run east/west dividing the property and separating the parcels.

Partial site zoning is shown in Figure 2. The site is presently zoned *Resort Commercial (RC)* under *Special Provision (SP)* 43 and 47. These provisions permit the following activities,

- SP-43: Applies to lands south of the CPKC tracks, and permits a travel trailer park to a max. of 200 recreational vehicle sites, single dwelling unit, concession stand for food sales, picnic shelters, variety store, laundromat, baseball diamonds, and washrooms, and,
- SP-47: Applies to lands north of the SPKC tracks, and permits day picnicking, washrooms, concession stand with food sales, pools and water slides, mini golf, volleyball courts, horseshoe pits, picnic shelters, and playgrounds.

Natural features and areas on the site are zoned *Natural Environment (NE)* with an *Environmental Protection (EP)* overlay generally applying to on-site natural features and areas. The entirety of the site is located within the *Greenbelt Plan (PB)* area and designated *Protected Countryside (PC)*. Natural features and lands north and east of the existing lake are also subject to the *Natural Heritage System (NHS)* overlay of the GP.

The developed areas of the site are shown in drawings **A1** (site plan) and **A2** (water shut off valves and septic stations plan). Drawing **C-101** presents the site plan including the areas dedicated for wastewater treatment and subsurface disposal. Copies of all drawings are provided in the appendices.

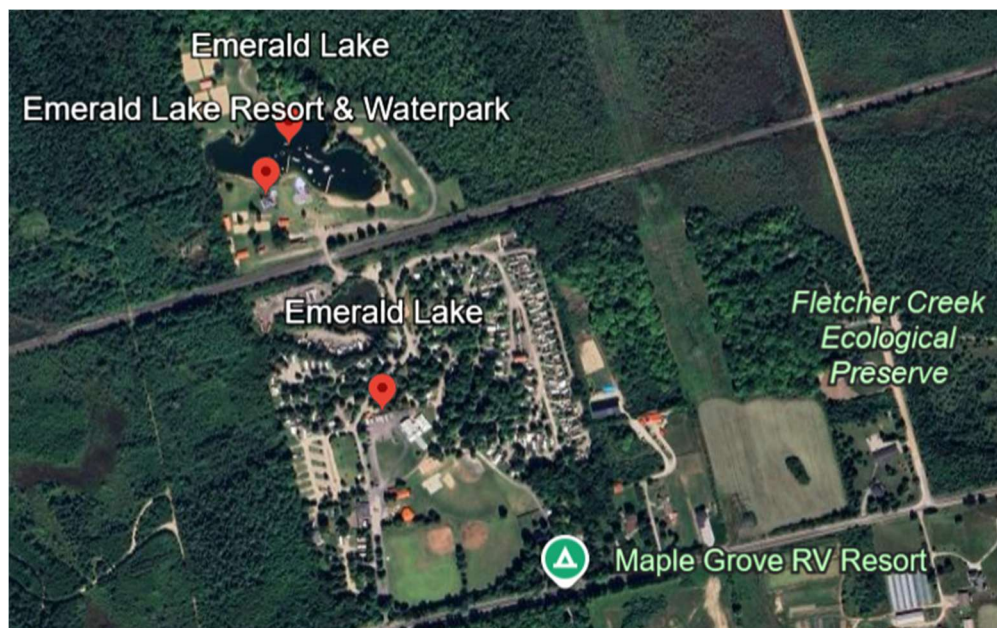


Figure 1 Aerial view of developed areas showing RV and water park

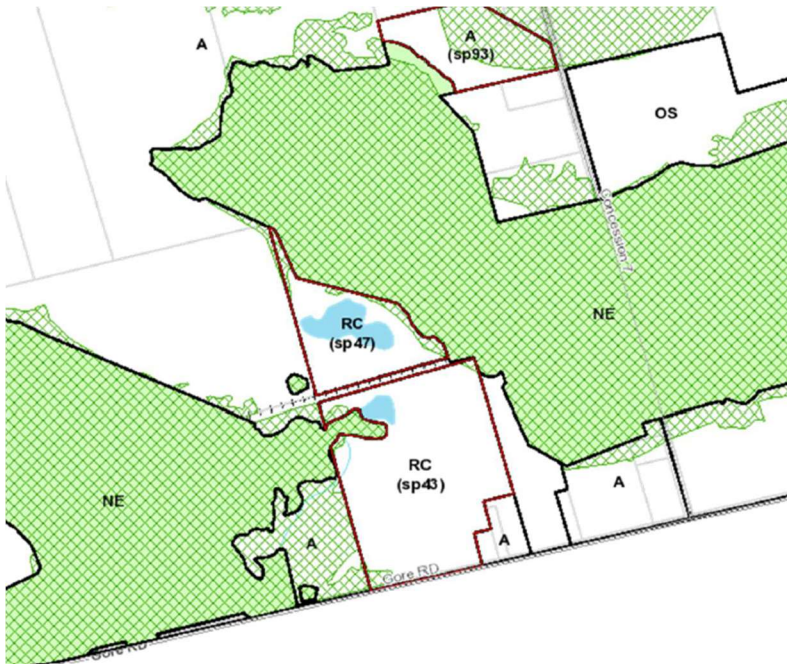


Figure 2 Puslinch zoning map showing portions of the site (red outlined area).

The site venues include recreational and outdoor multi-use facilities with shared washrooms (water park, volleyball courts, soccer field), the office, a banquet/assembly hall and a mix of serviced and un-serviced sites for RVs and tents.

Figure 3 presents the facility map, including serviced sites (shown in green and orange) and un-serviced sites and rough cabins (light and dark brown). **Note** the banquet hall is not shown in Figure 3 but is connected to site servicing.



Figure 3 Site map showing venues, use areas, serviced and un-serviced sites, and field washroom locations

2.0 SYSTEM DESIGN BASIS

The *historic operating* flows – recorded from both water and wastewater systems – were used to determine *design flows* for the site. This is consistent with industry best practices and follows the requirements in section 8.5.4 of the MECP (2008) *Design Guidelines for Sewage Works*,

“Wherever there are existing sewers and/or existing sewage treatment plants, the flow rates and sewage characteristics should be determined using real data, in both wet and dry weather conditions.”

There is a single effluent flow meter in the larger WBF WWTS. Similarly, a single distribution water flow meter is located in the WTS adjacent to the office. Sewage flows were correlated and verified against the recorded water flows which also accounts for non-sewer related uses.

This approach provides a *conservative evaluation* of the design flows.

2.1 Water System

2.1.1 Water Supply

Several wells are located on the site, including monitoring wells associated with the WWTS disposal beds and supply wells that provide water to WTS equipment and site amenities.

A few well abandonment records were also located for the site.

2.1.1.1 Permits

There was no current *Permit to Take Water (PTTW)* located in site files, and a search of the MECP on-line database returned only one (1) result,

- PTTW no. 1115-9WHQ5M for takings from a surface water source for recreational use (water park)

A copy of this permit was also located in site files. This permit expired in 2025.

Section 34(1) of the *Ontario Water Resources Act (OWRA)* requires a PTTW be obtained where water takings are greater than 50,000 litres per day (L/d). There is an exemption to this requirement provided in section 34(2),

“Subsection (1) does not apply to the following takings of water:

1. The taking of water for domestic purposes, other than by a municipal drinking water system within the meaning of the Safe Drinking Water Act, 2002 or by a company public utility, as long as the amount of water taken,

i. is always less than 379,000 litres, or the lower amount that is prescribed by the regulations, per day...”

It is possible this exemption will apply to the site; however, clarification should be sought through MECP prior to determining if a new PTTW is required.

2.1.1.2 Wells

A site visit in January 2026 located and identified four (4) water supply wells. Not all of the wells had missing well tags normally affixed to the casing. This may be characteristic of the age of the wells as section 14.11 of *Ontario Regulation (O.Reg.) 903 Wells* requires a well tag be permanently affixed to the casing of each well if the well was developed, expanded or altered in 2003 or later.

A review of the MECP on-line well record database returned four (4) records for water supply wells on the site (Table 1). Copies of the well records are provided in the appendices.

Well Record	Pumping Rate	Well Depth	Notes
A033276	1.5 L/s (20 GPM)	19.8 m (65 ft)	Adjacent to field washroom, provides water to Banquet Hall
6708698	3.7 L/s (50 GPM)	20.4 m (67 ft)	Adjacent to field washrooms near water park, provides water to field washroom and concession building
6707454	2.3 L/s (30 GPM)	15.2 m (50 ft)	Adjacent to office, provides water to office and camping areas
6706296	0.5L/s (6 GPM)	12.2 m (40 ft)	Near to office road gate, provides water to field washrooms

Table 1 Well records for Emerald Lake

The information available from the recent site visit suggests the following,

- Well A033276 provides untreated water to the banquet/assembly hall and WTS (Figure 4)
- Well 6706296 provides untreated water to the field washrooms near to the office and pavilion (Figure 5)
- Well 6708698 provides untreated water to the field washrooms at the water park and feeds water to the WTS in the concession stand (Figure 6), and,
- Well 67007454 provides water to the WTS in the office building (Figure 7).



Figure 4 Well for banquet hall WTS



Figure 5 Supply well for field washrooms near office



Figure 6 Supply well for field washrooms at water park and concession stand



Figure 7 Supply well for WTS in office building

All well caps were solidly affixed and sealed against infiltration, as well as electrical conduits.

2.1.2 Water Treatment and Distribution

Three (3) water systems provide servicing to the site; two are operated under Directives issued by the *Ministry of Health and Long-Term Care (MOH)*. None of the systems service more than five (5) permanent, year-round residential connections and there are no *designated facilities* provided with water from either system; thus, the water systems are regulated under O.Reg. 319/08 administered by the MOH.

2.1.2.1 Concession Stand

The water park concession stand contains point-of-entry (POE) treatment that provides treated water to plumbing immediately downstream in the concession stand and rental building.

The POE system consists of a single sediment (cartridge) filter followed by a single ultraviolet light (UV) disinfection reactor (Figure 8, Figure 9).



Figure 8 POE UV disinfection reactor, water park concession stand



Figure 9 POE UV disinfection reactor information panel

The POE system is sized to provide treatment for a maximum flow rate of 0.75 L/s (10 GPM).

The WTS is operated under a Directive issued by the Wellington-Dufferin-Guelph Public Health Unit (**PHU**). The Directive is dated April 29, 2022 and provides a Drinking Water System (**DWS**) no. for the WTS 866BLKFS4.

2.1.2.2 Office

The majority of the serviced area of the site – excluding some field washrooms – are provided with treated water from the WTS in the office building.

The WTS provides the following treatment equipment,

- Cartridge filtration: Big Blue style housings with graduated filters providing filtration to approximately ten micrometers (10 µm)
- UV primary disinfection through one (1) Trojan UV MaxPro 30 system (Figure 10)
- Chlorination secondary disinfection, including additional contact time in the single reservoir cell (Figure 11), and,

- Storage of treated water in a single reservoir prior to distribution by two (2) two horsepower (2 hp) pumps with variable frequency drive (**VFD**) control.



Figure 10 UV disinfection reactor in office WTS



Figure 11 Chlorine pump and reservoir riser with cover, office WTS



Figure 12 Water meter for distribution water flow, office WTS

The WTS equipment is sized to provide treatment for a maximum flow rate of 2.3 L/s (30 GPM).

The WTS is operated under a Directive issued by the PHU. The Directive is dated April 22, 2022 and provides a DWS no. for the WTS 766004077. A single flow meter measures the water distributed to the serviced area (Figure 12).

2.1.2.3 Banquet Hall

Well A033276 provides water to the WTS in the banquet hall. The WTS is a POE system that serves only the plumbing in the banquet hall. This WTS does not have a directive issued by the PHU; however, a directive will be required for future operation.

The WTS is provided with inline sediment/particulate (cartridge) filter and a single UVPure 500PN UV disinfection reactor (Figure 13, Figure 14). The UV system is provided with integral flow restrictors, capable of a maximum production rate of just over 1 L/s (16.5 GPM) and the unit performance is certified to ANSI/NSF Std. 55 Class A.

The capability of the UV system and the integral flow restrictor match with the rated output of the supply well (20 GPM), and the system is suitable for the intended application.



Figure 13 Banquet hall UV reactor.

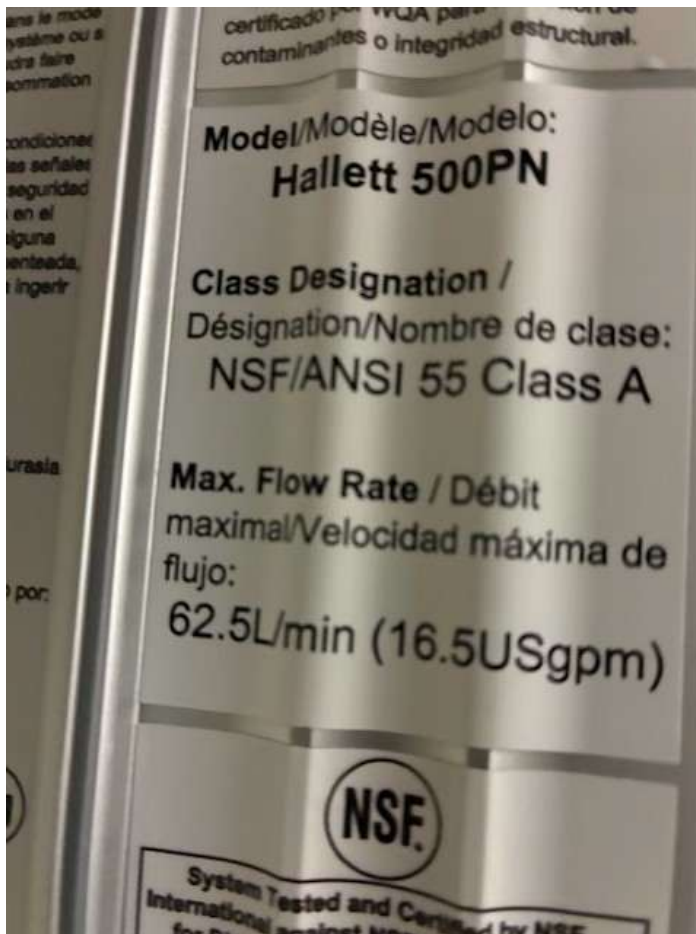


Figure 14 Banquet hall UV specification reference panel

2.1.3 Water Design Flow

2.1.3.1 Potable Water Flow

Neither the banquet hall nor concession stand WTS provide flow monitoring; however, the capacity of each well is matched to the treatment system provided, and it is assumed each system operates suitably for their intended service loading.

The Office WTS provides potable water to the serviced areas of the campground and RV park. A single flow meter monitors the flow of water from the cistern to the users in the park. Historic flows, 2020 through 2025, were used to assess water demand on the office WTS (Table 2).

The data in Table 2 suggests the AADF is approximately 62,440 L/d, and the MDF, excluding the questionable values from 2023, is 88,250 L/d.

Year	Avg. Day Flow (L/d)	Max. Day Flow (L/d)
2020	61,879	133,200
2021	58,210	85,500
2022	64,004	88,250
2023	71,610*	307,790*
2024	62,810	77,880
2025	56,135	77,000

*data with questions around validity of meter readings

Table 2 Water historic flow for office WTS

The expected, sustained well pumping rate of 2.3 L/s is equivalent to a maximum daily volumetric production of 198,720 L/d. This figure exceeds the historical water use data (AADF and MDF) and supports exclusion of the suspect volumes reported for a brief period in 2023 (well yield is below the recorded values).

The rated capacity of the primary (UV) disinfection provided in the office WTS matches the expected production rate for the well. There is no concern regarding improperly disinfected water based on the available information at the time of the January site visit.

2.1.3.2 Fire Fighting Water

Fire fighting water for the site is not provided through the on-site WTS.

An agreement with the municipality was reportedly reached where on-site surface water is to be used and pumper trucks provided to provide sufficient volume and pressure of water in the event of a fire.

2.2 Wastewater Collection and Treatment

The site is provided with dedicated gravity sewers and pressurized forcemains that collect and convey site generated wastewater flows to the WWTS. The layout and configuration – including interim tanks, pipe sizes and direction of flow – are shown in drawing **C-101**.

The site plan also includes a servicing bloc (drawing **C-101**) adjacent to the soccer fields/dog run area. This area houses the WBF-based WWTS. A second servicing bloc housing the smaller WWTS is located north of the CPKC rail line near to Emerald Lake.

Sewage flows are distributed across the site, with contributing sources that include field washrooms as well as serviced sites and a single, small trailer dump station of approximate volume 3,800 L (100 USGal).

A general review of the site collection and treatment infrastructure was completed in 2011 by BKL Engineering (see appendices). Their report included the number and total volume of holding and septic tanks throughout the site.

The WWTS serving the site are approved and operated in accordance with ECA no. 6567-8GBPVB. A copy of the current ECA is provided in the appendices.

2.2.1 Wastewater Flows

The Class IV system that services the water park washrooms and concession stand is not metered.

The WBF-based WWTS provides effluent flow metering. Historic treated effluent flow records were used to determine wastewater flows. Table 3 presents the treated effluent flow data from the WBF WWTS from 2020 through 2025.

Year	Total Flow, L	ADF (L/d)	MDF (L/d)
2020	4,200,910	36,480	78,430
2021	5,464,543	46,071	88,580
2022	5,658,090	45,560	51,750
2023	6,721,280	72,709	76,986
2024	5,550,000	40,720	41,280
2025	4,021,060	34,450	40,310

Table 3 Wastewater historic flow data.

The data presented in Table 3 provides the following values for use during the evaluation of the design,

- AADF of 46,441 L/d, and,
- MDF of 88,580 L/d.

The values determined above closely match the water flow data from Table 2, supporting the validity of the two (2) data sets.

The AADF – except for 2023 – was below the rated capacity of the WBF WWTS in the ECA. It was noted earlier the data collected from the WTS in 2023 was suspect due to several days with suspiciously elevated values.

The MDF in several years exceeded the rated capacity of the WBF WWTS. The rated capacity is typically set by the rate-limiting step in the overall process, and specifically where subsurface disposal is provided the limiting factor is most often the bed area provided.

2.2.2 Wastewater Quality

Raw sewage is not sampled at the site. Sampling of influent is not a requirement in the ECA.

The *MECP Design Guidelines for Sewage Works* (2008) recommends the following influent quality for the site (Table 4).

<i>Parameter</i>	<i>Concentration (mg/l)</i>
cBOD₅	150 to 200
TSS	150 to 200
TP	6 to 9
TKN	30 to 40
TAN	20 to 25

Table 4 Literature influent sewage characteristics

The ECA does not contain any effluent quality limits; however, the ECA does provide effluent quality objectives (Table 5).

<i>Parameter</i>	<i>Objective (mg/L)</i>
cBOD₅	10
TSS	10
NO₃-N	5

Table 5 Effluent quality objectives, ECA no. 6567-8GBPBV.

The ECA also requires seasonal monitoring of groundwater quality in three (3) developed monitoring wells (**MWs**). The locations of these wells are marked on the BKL Engineering site plan in the appendices.

The monitoring effort is to ascertain if the operation of the approved works under the ECA has an adverse impact on the receiving water quality. There are no explicitly defined objectives or limits in the ECA; however, a subsurface discharge system in Ontario must be designed and operated such that the concentration of nitrate (NO₃) and nitrites (NO₂) in the groundwater plume must be less than 10 mg/L at the property limit in accordance with MECP *Guideline B-7 (Reasonable Use Guideline)*.

2.2.3 Site Sewage Works

The site is presently serviced by two (2) WWTS, as described in the ECA. The approved works are summarized as,

- existing sewage treatment and subsurface disposal works with a Rated Capacity of 49,200 litres per day, consisting of pre-treatment facilities, recirculating bio-filters, de-nitrification beds and subsurface disposal systems to service an expanded and existing 240 units seasonally occupied (May 1st to October 31st), and,
- existing Class IV septic system with a Rated Capacity of 5,065 litres per day serving a seasonal water park located on the same site location.

The ECA provides additional details of the associated works.

Work completed by BKL Engineering included a summary of the existing works and proposed future works, mostly consistent with the current ECA. A copy of their 2011 report is provided in the appendices.

2.2.3.1 Class IV Septic

The existing Class IV system servicing the field washrooms adjacent to the water park as well as the concession stand is described in the ECA. Additional details and an evaluation of capacity and sizing were previously completed by BKL Engineering (see appendices).

The disposal bed area is shown in Figure 15.



Figure 15 Disposal bed servicing water park field washrooms.

The BKL review noted the system was appropriately sized in their opinion based on a review of users and estimated flow data. There have been no substantial changes to the user base or fixture load associated with this system, and there is no history of bed breakouts or other issues.

This system is deemed adequate to provide the required level of servicing under present loadings.

Should additional development in this area be proposed, a detailed review of the design and loading will be required and an amendment to the ECA may be necessary.

2.2.3.2 WBF System and Disposal Beds

The WBF system provides treatment to most sewage flows generated on the site.

The WBF system process, noting fifteen (15) tanks in total, is shown in Figure 16.

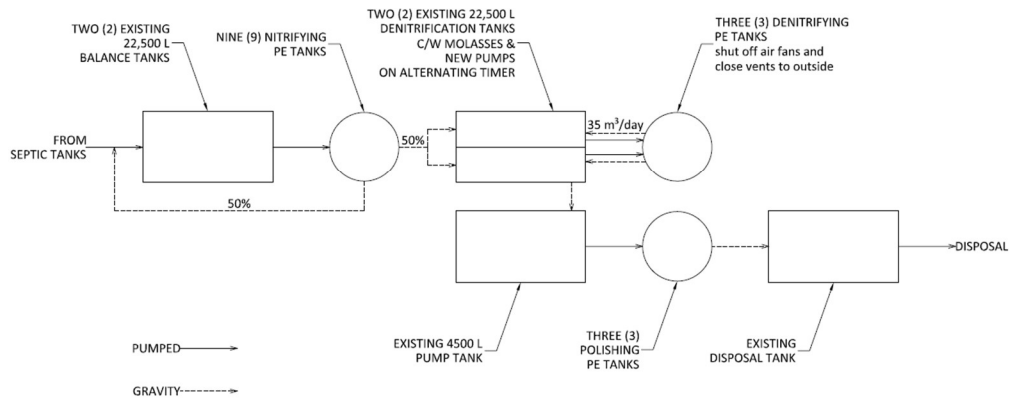


Figure 16 WBF treatment process flow diagram.

The WBF process includes the following operations,

- Equalization/pumping
- Biological reduction incl. nitrification
- Chemical addition
- Denitrification
- Effluent polishing, and,
- Effluent equalization and discharge pumping.

Figures 17 through 20 illustrate components of the WBF system and associated disposal beds.



Figure 17 WBF process media tanks in treatment building.



Figure 18 Shallow buried trench inside fenceline separated from play field by swale.



Figure 19 Additional shallow buried trench installed outside of fence line between play fields.



Figure 20 Installation of shallow buried trench disposal bed November 2015.

There were a couple of discrepancies noted in reviewing *as constructed* site information and related correspondence with the original equipment manufacturer (OEM) for the WBF system and the description provided in the ECA. These items are identified and described below.

- WBF system tanks: the BKL summary and current ECA state a total of sixteen (16) tanks are provided in the treatment system. The recent site inspection and review of OEM correspondence confirmed there are fifteen (15) tanks provided in the treatment system – nine (9) tanks for secondary (biological) treatment, three (3) tertiary denitrifying tanks, and three (3) effluent polishing tanks, and,
- Disposal beds: the ECA states a total of four (4) runs each of 125m pipes are provided in a shallow-buried trench (**SBT**) system, with an additional proposed expansion to consist of an additional four (4) runs of 125 m. The BKL summary notes in the last column of the table on page 5 in section 5 that two (2) SBT systems will be required.
The recent site inspection and review of system layout and installation photos confirmed that a second SBT system was installed in 2015, consisting of four (4) runs of 125 m pipe. Field measured estimates suggest that the length of pipe runs provided may be slightly

larger than 125m, indicating potential extra disposal capacity; however, *as constructed* drawings for the systems were not located to confirm exact lengths.

The impacts of these changes are reflected in the operating data summarized in Table 6 and Table 7.

Additionally, the ECA states the system provided (and as described in the supplementary memo from BKL for the 2012 ECA amendment) is for treatment for sewage from 240 serviced sites. The BKL memo notes the servicing design was developed and reviewed for 240 serviced and 40 un-serviced tent and rough cabin sites, for a total of 280 sites.

The current site contains 272 sites in total, with 38 rough cabin or tent sites.

2.3 Operating Data

Table 6 presents a summary of the MW well data collected for the years 2020 through 2024; consolidated data for 2025 was not available at the time of preparation of this report.

Note MW3 is upstream of the discharge to the disposal beds and marks the background (comparative) water quality, MW1 is downstream near the property boundary and represents the groundwater quality inclusive of the assimilated discharge of treated effluent, and MW2 is an interim water quality monitoring point adjacent to the SBT systems and reflects immediate impacts prior to assimilation into the shallow groundwater table.

MW3	2020	2021	2022	2023	2024
cBOD₅	<2	<2	<2	<2, 3, <2	<2
TP	0.60, 0.095	0.21, 0.17, 0.27, 0.10	0.045	0.037, 0.034, 0.02	0.06, 0.02
NO₂	1.78, 1.32	<0.01	<0.01	<0.01	<0.01
NO₃	<0.1, <0.1	0.35, 0.8, 0.14	<0.1	0.25, 0.25, 0.42	0.29, 0.11
TKN	0.83, 0.47	0.84, 0.46, 0.43, 0.48	0.25	0.82, 0.56, 0.66	0.81, 0.68
e.coli*	0, 0	1, 5, 3, 1	<1	<1	<1, 2
pH	7.5, 7.3	7.7, 7.4, 7.0, 7.2, 7.1	7.0	7.4, 7.1, 7.2	11.2, 7.1

MW2	2020	2021	2022	2023	2024
cBOD₅	<2	<2, 3, <2, <2	<2	<2, <2, <2	<2
TP	0.79	0.32, 1.6, 1.6, 0.83	0.71	0.31, 1.0, 0.89	0.47
NO₂	19.1	0.012, <0.01, 0.033, 0.035	<0.01	<0.01, 0.18, 0.24	0.027
NO₃	0.043	<0.1, 0.35, 0.8, 0.14	4.76	7.58, 15.3, 7.77	12
TKN	0.56	0.84, 0.46, 0.43, 0.48	0.49	<0.2, <0.2, 1.2	1.3

e.coli*	4000	<1, 5, 3, <1	980	21, 1300, 18	57
pH	7.4	7.7, 7.4, 7.0, 7.2, 7.1	7.12, 7.24	7.6, 7.2, 7.1	7.1

MW1	2020	2021	2022	2023	2024**
cBOD₅	<2	<2, <2	<2, <2	<2	N/A
TP	0.66	0.24	0.22	0.21	N/A
NO₂	0.1	<0.01, 0.185	<0.01	<0.01	N/A
NO₃	<0.1	<0.1, 0.77	<0.1	<0.1	N/A
TKN	0.15	1.1	0.22	1	N/A
e.coli*	5	<1, <1	4	<1	N/A
pH	7.64	8.2, 7.9, 7.4	7.3, 7.5	7.6	N/A

*reported as CFU/100mL, all other parameters reported in mg/L save for pH.

**the ground water table elevation was too low to be intercepted by MW1 and no data is available for the 2024 season.

Table 6 MW water sample analytical data 2020 through 2024

The data presented in Table 6 clearly shows the effluent discharged from WBF WWTS to the disposal beds has not had a significant, adverse impact on the groundwater receiver and the system is operating in compliance with the expected requirements under the Reasonable Use Guideline.

Analytical data for samples of treated effluent of the WBF system 2020 through 2024 are presented in Table 7 as annual average concentrations. Consolidated analytical; data for 2025 was not available at the time of preparation of this report.

	2020	2021	2022	2023	2024
cBOD₅	2	2	82	12	5
TSS	4	2	12	10	4
TP	10.9	9.4	12	10	8.5
TAN	3.15	6.7	40	30	15
TKN	5.48	7.3	43	31	20
NO₂	0.04	0.13	1	0.35	0.1
NO₃	42.6	32.6	6	17	25
e. coli*	1216	847	117,500	36,250	26,600
pH	6.8	6.8	6.5	6.6	6.8

*reported as CFU/100mL. All other parameters reported as mg/L except for pH.

Table 7 Summarized effluent sample analytical data 2020 through 2024.

The data presented in Table 7 illustrates several, important elements,

- The WBF system is operating to meet the effluent objectives for cBOD₅ and TSS as presented in the ECA
- The WBF system has not consistently achieved effluent NO₃ concentrations meeting the objective listed in the ECA, and,
- The WBF system has demonstrated the ability to treat the site generated sewage during short periods of elevated flows (above the *rated capacity* of the works in the ECA).

Table 8 presents a detailed review of the effluent NO_3 concentrations.

NO_3	2020	2021	2022	2023	2024
Early Sample	53.1	42.4	<0.1	28.1	41.6
Mid Sample 1	40.2	31.5	<0.1	<0.1	21.5
Mid Sample 2	23.1	31.7	<0.1	3.91	15.2
Late Sample	53.9	24.8	25.4	36.3	20.1

Table 8 Effluent NO_3 concentration

The data presented in Table 8 illustrates a well-known issue – seasonally operated systems have difficulty establishing biological denitrification processes.

Biological wastewater treatment processes establish bacterial populations in a well-understood manner,

- Carbonaceous (organic carbon) removal processes typically become established within a few weeks of starting up a system, with or without using seed bacteria. These bacteria are robust and relatively resistant to operational upsets including cyclic loading resulting from early-season weekend occupancy, and lower operating temperatures
- Nitrification (convert TKN to TAN/ammonia) and ammonification (convert TAN to NO_3) are the next populations to become established, and will require anywhere from two (2) to six (6) weeks after carbonaceous removal depending on the loading (consistent flow) and process conditions (pH and temperature), and,
- Denitrification (convert NO_3 to nitrogen gas, N_2) populations are the last to become established and may require several months to become fully established – if at all. These bacteria are very sensitive to changes in flow, temperature and pH, and under low organic loading will require supplementary nutrient (carbon) addition, as illustrated in the PFD (Figure 16).

It is very rare to have a seasonally operated system achieve full denitrification ($\text{NO}_3 < 5 \text{ mg/L}$ as listed in the ECA objectives), even more so where early season and late season loading is cyclical as is the situation at the site.

These trends are evident when looking at data in a given operating season (Table 9).

2024	cBOD_5	TKN	TAN	NO_3
Early Sample	2	4.5	0.06	53.1
Midseason Sample 1	4	2.3	0.05	40.2
Midseason Sample 2	12	13	12	23.1
Late Sample	<2	2.1	0.5	53.9

Table 9 Detailed operating samples, WBF effluent 2024

The data in Table 9 illustrates,

- Carbonaceous removal is established early, with peak effluent concentration observed in August. This timing aligns with both peak occupancy (loading) and increased

- supplementary carbon addition to support denitrification (excess cBOD₅ to be removed in the polishing tanks provided in WBF system, Figure 16)
- Nitrification and ammonification are established prior to midseason sampling
 - Denitrification is beginning to establish by the later midseason sample, and,
 - When the flows tail off at the end of the season the denitrification bacteria begin to die off and effluent NO₃ concentration increases as a result.

It is my opinion that the WBF system is capable of treating the site generated sewage; however, denitrification will likely not meet the objective due to biological and physical limitations of the process.

3.0 SUMMARY OF SERVICING

3.1 Water

The site provides drinking water from three (3) on-site, non-municipal supplies. The three (3) systems provide treatment in accordance with the requirements of the *Procedure for Disinfection of Drinking Water in Ontario*. The three (3) WTS are regulated under the HPPA and O.Reg. 391/08, and two (2) are administered through directives issued by the PHU. The banquet hall WTS will require a directive issued by the PHU.

There is no current PTTW for the various, aggregate well supplies on site. The *domestic use* exemption provided under the OWRA may apply, and the owner should reach out to the MECP for clarification if a PTTW is required.

The water supply well records located in MECP on-line database show well pumping rates that match the hydraulic design of the three (3) WTS. There is no indication of water shortages in previous operating years, and the historic water use data clearly demonstrates the volume of water used on the highest use day in the last six (6) years was lower than the expected well yield on any given day.

The WTS in the office that supplies the majority of the site with potable water is capable of supporting the existing site uses, and provides room for future expansion.

The water supply systems are operated in accordance with Directives issued by the MOH.

Firefighting water is not provided via the water treatment systems. There is a large surface water body on site which serves to provide fire water, and a reported agreement with the municipality to use this surface supply for the purpose of fire fighting.

3.2 Wastewater

Wastewater generated at the water park field washrooms and concession stand is collected by conventional gravity sewers and pumped to the Class IV disposal system. The system was previously reviewed by BKL Engineering and found to be suitable for this use. No significant changes to site use, and no significant increases in flows have been noted in recent years, and the opinion presented by BKL Engineering remains valid.

A modular WBF-based treatment system with a rated capacity (ADF) of 49.4 m³/d is provided to treat the influent sewage from the serviced sites, field washroom and office building. The treated effluent is discharged to two (2) SBT trench systems and provided with MWs to assess the impact of operating the WWTS on the shallow groundwater table.

The system is sized to provide treatment and disposal for the ADF derived from historical flows; however, MDF flows do exceed the rated capacity in the ECA. The performance of the system, derived from analytical results on samples of treated effluent from the WBF WWTS and the three (3) MWs over a five (5) year period, suggest the system is providing a suitable level of treatment for existing site uses through these peak loading periods.

Groundwater quality monitored through the MWs did not show any adverse impact from the effluent disposal trenches, and the requirements under the Reasonable Use Guideline have routinely been met at the property limit.

The WBF-based system is capable of meeting the effluent objectives in the ECA for cBOD₅ and TSS and achieves nitrification to reduce effluent TAN concentration and loading; however, the seasonal nature of the site operation coupled with early and late season cyclical loading negatively impacts denitrification in the WWTS. This is not unusual for seasonal systems.

The existing WWTS are suitable to continue to provide treatment for the existing site uses and loadings, but the description in the ECA needs to be amended to reflect existing site conditions and number of system users.

The existing WWTS are not suitable to provide additional servicing under current configuration. Additional site loading will require an expansion of the existing treatment processes and SBT disposal beds.

During occasional use of the banquet hall when occupancy is expected to be high and the regular site areas are full it is recommended portable washrooms be provided on a temporary basis to supplement the existing WWTS, until additional bed capacity is provided.

4.0 CONCLUSIONS AND SUMMARY

The on-site communal, sanitary servicing provided at Emerald Lake is sufficient for the existing site user load and occupancy.

The water supply system is operated and managed in accordance with the requirements of the regulations under the HPPA.

The apparent well yield and treatment system capacity for the WTS in the office building can support future expansion.

The Class IV wastewater system serving the field washrooms and concession stand in the water park area is appropriately sized for the expected loading. There have been no reported break outs from the bed area.

The communal WBF-based treatment system servicing the seasonally occupied areas of the site is providing treatment to meet the existing loading; however, it is operating at the expected limit of its capabilities. No additional loading is recommended for the system; however, no expansion is required to continue to service the existing site users.

The existing ECA requires minor amendments to reflect current operating conditions and ensure compliance with the description of the works.

5.0 LIMITATIONS

The conclusions and recommendations (where offered) presented in this servicing report are based, in part, on the findings of reports prepared by Others, and interviews conducted with the proponents. Any conclusions cannot be and are not extended to information or records which were not reasonably available, in Clearford's opinion, for direct observation and review.

It should be noted that Clearford is an engineering and operational organization and, therefore, the contents of this report should not be interpreted as providing legal advice, opinions or interpretations.

No other warranties or representations, either expressed or implied, are made as to the professional services provided under the terms of the Contract, or the conclusions presented.

The conditions at the proposed site were assessed, within the limitations set out above, having due regard for applicable Regulations and procedures as of the date of the inspection, as well as original design drawings and reports where available.

The site history research included obtaining information from third parties and employees or agents of the proponents. No attempt has been made to verify the accuracy of any information provided, unless specifically noted in the report.

This report is for the sole use of Emerald Lake, to whom it is addressed, unless expressly stated otherwise in the report or contract. Any use which any third party makes of the report, in whole or the part, or any reliance thereon or decisions made based on any information or conclusions in the report is the sole responsibility of such third party. Clearford accepts no responsibility whatsoever for damages or loss of any nature or kind suffered by any such third party as a result of actions taken or not taken or decisions made in reliance on the report or anything set out therein.

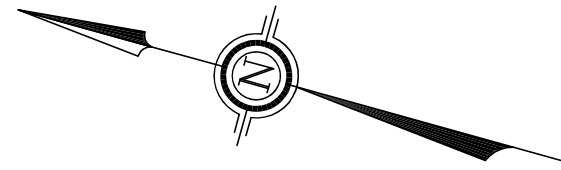
Appendix A Site Drawings

Appendix B ECA No. 6567-8GBPBV

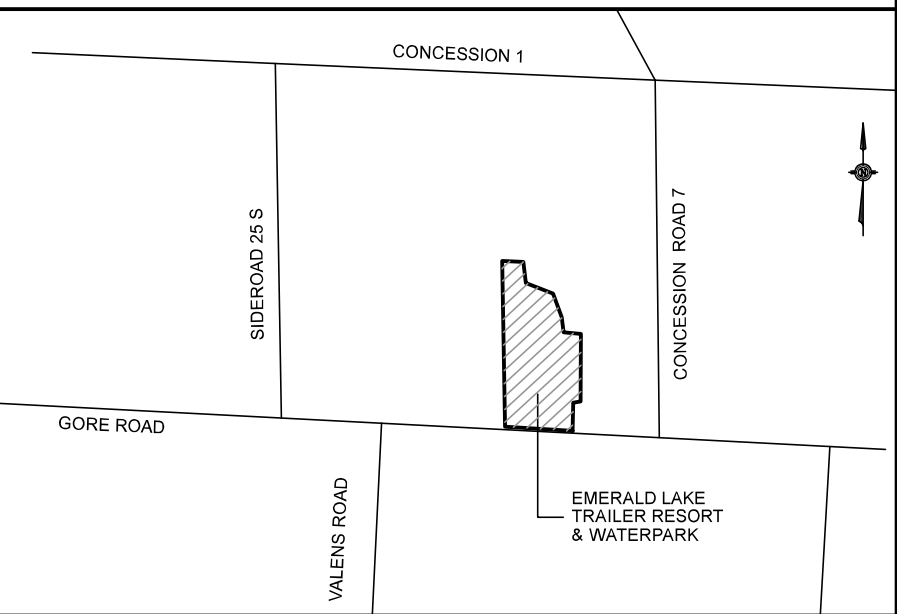
Appendix C PHU Directives

Appendix D Well Records

Appendix E BKL Engineering and Waterloo Biofilter



ALL UNDERGROUND SERVICES MUST BE LOCATED BY CONTRACTOR PRIOR TO ANY CONSTRUCTION.
CONTRACTOR MUST CHECK AND VERIFY ALL DIMENSIONS AND JOB CONDITIONS BEFORE PROCEEDING WITH WORK



KEY PLAN NOT TO SCALE

LEGEND
← DENOTES DRAINAGE FLOW

UNIT COUNT	
209	SEASONAL CAMPSITES
28	SINGLE TRAILER FULL HOOK UP
23	TRANSIENT SITES & GROUP CAMPING SITES
21	TENT AND POP UP TENT-TRAILER SITES
272	TOTAL

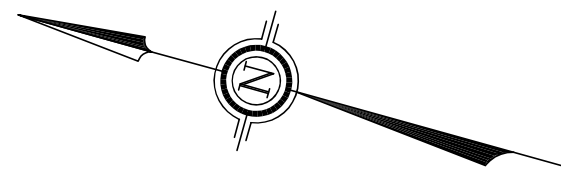
No.	DATE	REVISIONS
3	SEPT 24, 2025	PLAN UPDATED
2	SEPT 9, 2025	PLAN UPDATED
1	SEPT 3, 2025	PLAN PREPARED

SCALE - NOT TO SCALE

Millington & Associates
PLANNING & DEVELOPMENT CONSULTANTS
3380 South Service Road, Burlington, Ontario, L7N 3J5
Office: (905) 639-3892 Fax: (905) 333-9544

TITLE :
EMERALD LAKE TRAILER RESORT & WATERPARK
SITE PLAN

Municipal DWG. NO.	Regional No. DWG. NO.
PROJECT No.	DWG. NO. A1



ALL UNDERGROUND SERVICES MUST BE LOCATED BY CONTRACTOR PRIOR TO ANY CONSTRUCTION.
CONTRACTOR MUST CHECK AND VERIFY ALL DIMENSIONS AND JOB CONDITIONS BEFORE PROCEEDING WITH WORK

KEY PLAN NOT TO SCALE

LEGEND

← DENOTES DRAINAGE FLOW

S#1 DENOTES SEPTIC STATIONS

DENOTES WATER SHUTOFF VALVE

SEPTIC STATIONS

#1 A) 2500 GALLON SEPTIC TANK
B) 1000 GALLON PUMP TANK
C) 200 GALLON PUMP TANK

#2 A) 2500 GALLON SEPTIC TANK
B) 600 GALLON PUMP TANK

#3 A) 2 - 5000 GALLON SEPTIC TANK
B) 600 GALLON PUMP TANK

#4 A) 500 GALLON SEPTIC TANK, PUMP TANK
B) 2500 GALLON SEPTIC TANK
C) 2000 GALLON PUMP TANK

#5 A) 2000 GALLON DOUBLE SEPTIC TANK
B) 600 GALLON PUMP TANK

#6 A) 5000 GALLON DOUBLE SEPTIC TANK
B) 600 GALLON PUMP TANK

#7 A) 2 - 5000 GALLON DOUBLE SEPTIC TANK
B) 600 GALLON PUMP TANK

#8 A) 3500 GALLON DOUBLE SEPTIC TANK
B) 5000 GALLON DOUBLE SEPTIC TANK
C) 600 GALLON PUMP TANK

#9A A) 500 GALLON SEPTIC TANK
B) 500 GALLON PUMP TANK

#9B A) 5000 GALLON DOUBLE SEPTIC TANK
B) 300 GALLON PUMP TANK
C) GALLON PUMP TANK

#10 A) 2000 GALLON DOUBLE SEPTIC TANK
B) 500 GALLON PUMP TANK

#11 A) 2000 GALLON DOUBLE SEPTIC TANK
B) 1000 GALLON PUMP TANK
C) GALLON PUMP TANK

SEWAGE STATION

#1 100 GALLON DUMP STATION

#2 1000 GALLON DUPLEX PUMP CHAMBER

#3 2 - 5000 GALLON ANAEROBIC DENTRICATION TANKS 2 PUMPS

#4 2 - 5000 GALLON HOLDING TANKS 2 PUMPS

#5 FLOW METER

#6 2 - 900 GALLON DOSING PUMP CHAMBERS

WATER SHUT OFF VALVE UNITS

#1 SERVICES 4 TO 8

#2 SERVICES 1 TO 3 & 14 TO 16

#3 SERVICES 200 TO 209

#4 SERVICES 30 TO 34 & 37 TO 40

#5 SERVICES 49 TO 61, WASHROOM & SHOWERS

#6 & 7 DIVIDES LEFT & RIGHT OF ROAD

#8 SERVICES 68 TO 74 & C12, 62 TO 67

#9 SERVICES 155 TO 167 & 168 TO 208

#10 SERVICES 99 TO 113 & 113 TO 128

#11 SERVICES F6 TO F18

#12 SERVICES C7 TO C11

No.	DATE	REVISIONS
3	SEPT 24, 2025	PLAN UPDATED
2	SEPT 9, 2025	PLAN UPDATED
1	SEPT 3, 2025	PLAN PREPARED

SCALE - NOT TO SCALE

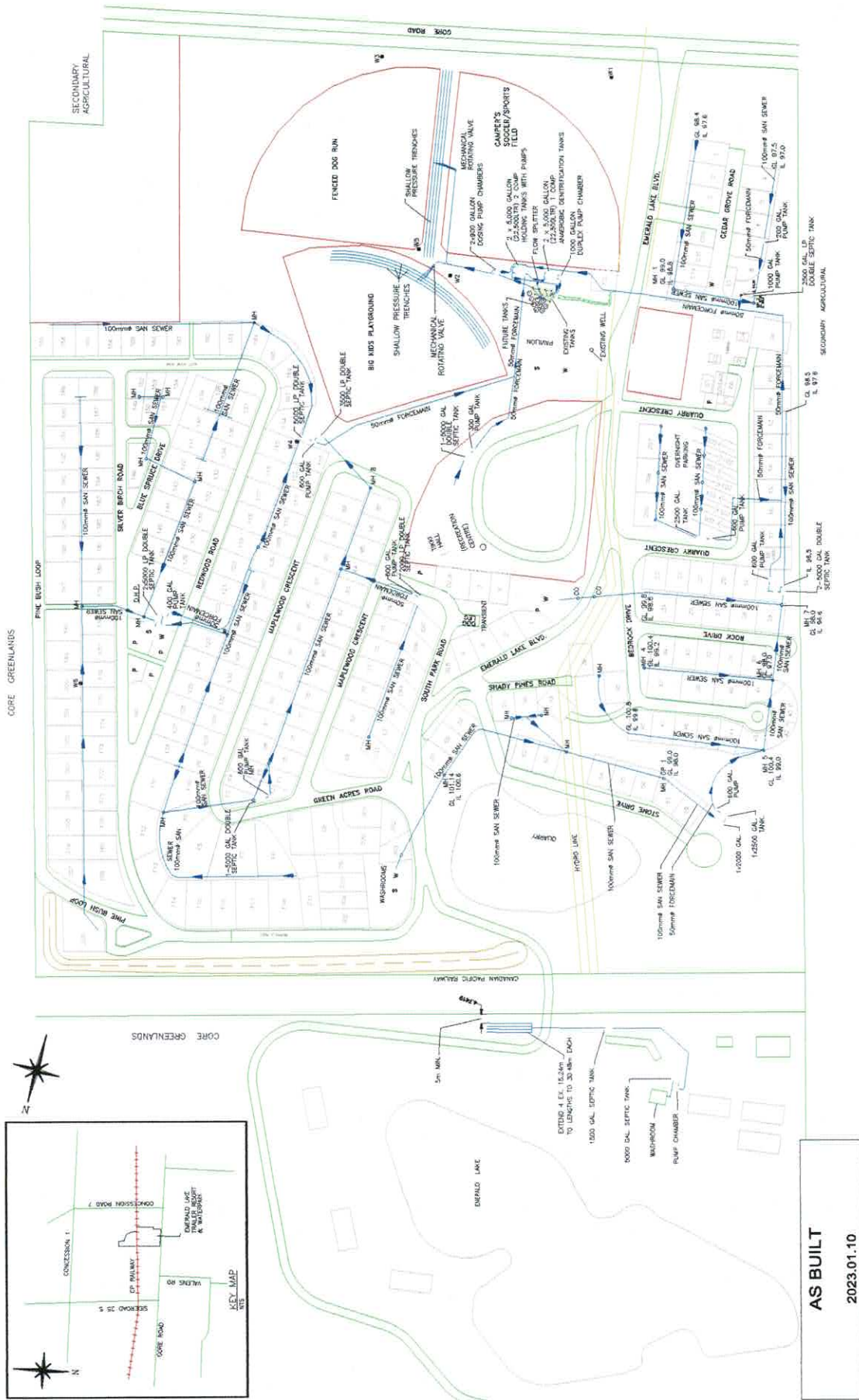
Millington & Associates

PLANNING & DEVELOPMENT CONSULTANTS

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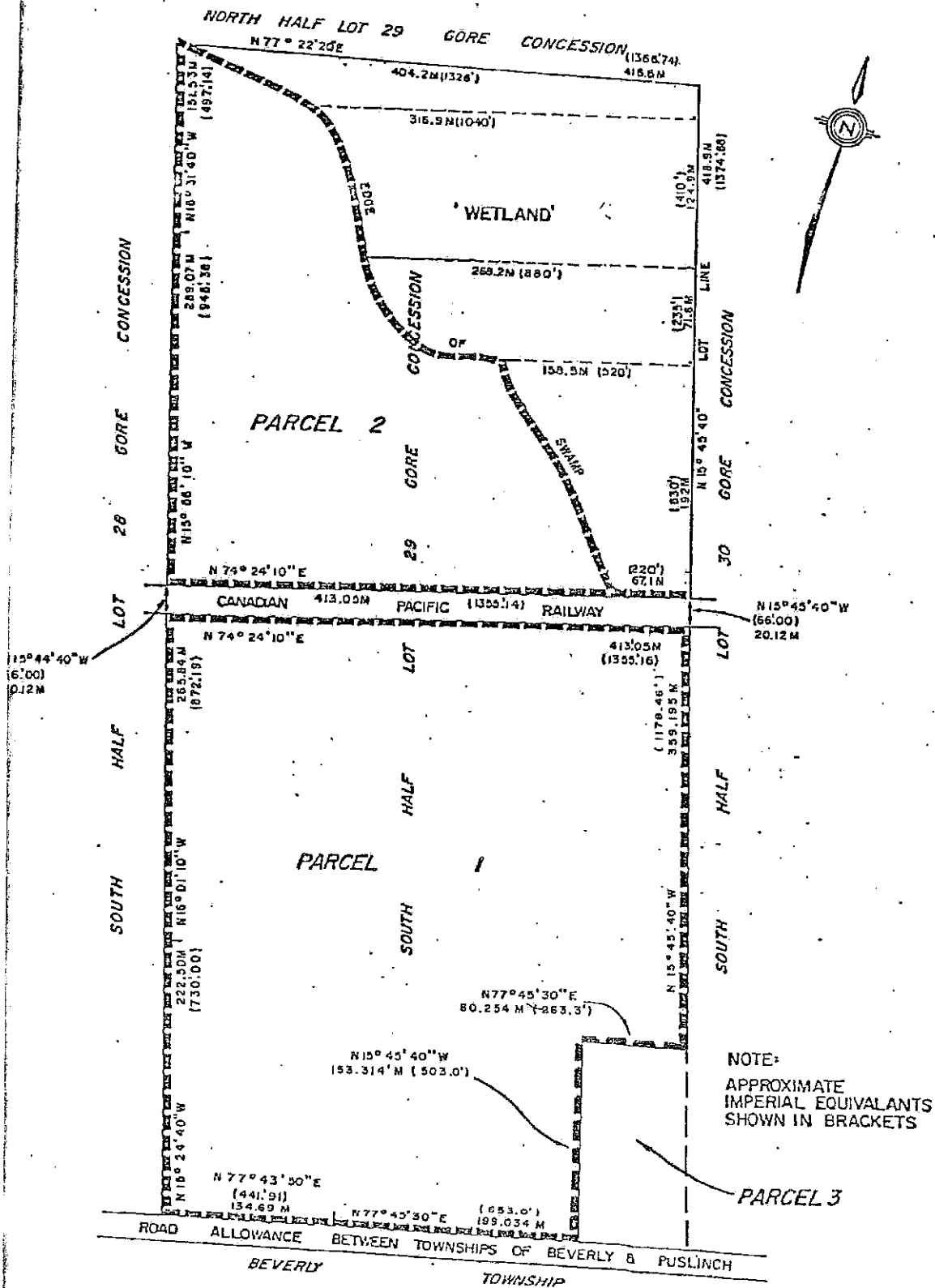
TITLE :
EMERALD LAKE TRAILER RESORT & WATERPARK
WATER SHUTOFFS VALVES & SEPTIC STATIONS

Municipal DWG. NO.	Regional No. DWG. NO.
PROJECT No.	DWG. NO. A2



NOTES	BOXES PLOTED BOX: 27 X 14" NOT TO SCALE	 MIG PROJECT: No. 11-101.00	EMERALD LAKE PARKS 7248 GORE ROAD, PUSLINCH SITE PLAN										DRAWING NUMBER C-101			
	PLOTED BOX: 11 X 17" NOT TO SCALE		NO.	1	AS BUILT	DATE	2024.01.10	RA	PK	PK						
					REVISIONS			UNION	DESIGNED	CHECKED	APPROVED					

SCHEDULE "A"



AMENDED ENVIRONMENTAL COMPLIANCE APPROVALNUMBER 6567-8GBPBV
Issue Date: March 2, 2012

Emerald Lake Inc.
7248 Gore Road, Rural Route 2
Puslinch, Ontario, N0B 2J0

Site Location: Emerald Lake Trailer Park
7248 Gore Road,
Township of Puslinch, County of Wellington

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

upgrading and expansion of an existing sewage treatment and subsurface disposal works with a *Rated Capacity* of **49,200 litres per day**, consisting of pre-treatment facilities, recirculating bio-filters, de-nitrification beds and subsurface disposal systems to service an expanded and existing 240 units seasonally occupied (May 1st to October 31st) trailer park development, located in Part of South Half, Lot 29, Gore Concession, in the Township of Puslinch, and an existing Class IV septic system with a *Rated Capacity* of **5,065 litres per day** serving a seasonal water park located north of the CP Railway on the same site location, as follows:

Proposed Works

- **Pre-treatment:** one (1) septic tank having a capacity of 22,500 litres, located at the west of Green Access Road within the Emerald Lakes Park Developments as shown on drawing No SP-1 Rev F dated February 2001, prepared by B.K.L Engineering. The tank consists of two compartments, together with a separate pump chamber of 2,250 litres capacity for collecting effluent from the septic tank and is equipped with one (1) pump and an effluent discharge line to discharge into a low pressure collection system collecting effluent from the septic tank and trailers to discharge into the existing septic tank at the west of the Baseball Court 3;
- **Treatment:** seven (7) aerobic biofilters each having dimensions of 2.44 metres diameter x 2.44 metres high for an installed total of sixteen (16) biofilters, each rated for 4,500 litres per day to 5,000 litres per day, filled with light weight synthetic filter medium design for a hydraulic loading rate of 2,000 litres per square metre per day complete with inlet spray nozzles, inflow distribution, effluent collection and ventilation system, complete with an

effluent dividing chamber; and

- **Subsurface Disposal System:** four (4) shallow buried trenches each 125 metres in length, laid in 300 millimetres wide by approximately 300 millimetres to 450 millimetres deep parallel trenches, excavated in the native soil with centre line spacing 2.5 metres, and each trench equipped with a centrally placed 25 millimetre diameter perforated distribution pipe and covered by a 300 millimetre diameter half-pipe chamber and back-filled with native soil, together with an automatic distribution valve on connection from the forcemain to the manifolds feeding the perforated distribution laterals, complete with clean-out valves and pressure gauge connectors on the laterals.

Previous Works

"Previous Works" approved under Approval Number 5058-5VDTJN dated March 11, 2004 as follows :

- **Pre-treatment:** twelve (12) septic tanks (6- 22,500 litres, 1- 15,900 litres, 3- 11,250 litres, 1-9000 litres and 1-4,500 litres) having a total capacity of 198,150 litres, located within the Emerald Lakes Park Developments shown on drawing No E-98-10 (SP-1) dated February 2001, revised September 2003, and October 2010, prepared by BKL Engineering, each tank equipped with two compartments, nine (9) pump chambers collecting effluent from the septic tanks, consisting of one (1) pump and an effluent discharge line together with a low pressure collection sewer system collecting effluent from the septic tanks and discharging to two (2) holding tanks centrally located near the existing septic bed area,
- **Holding Tanks:** two (2) 22,500 litres capacity two-compartment tanks each tank equipped with one (1) submersible effluent pumps rated at 3.42 litres per second at 15.7 metres total dynamic head, discharging to a system of bio-filters described later, complete with liquid levels, timer pump controls and an alarm system,
- one (1) chemical (molasses carbon source) dosing system complete with supply tank, wash water facility and one (1) dosing pump rated at 0.8 litre per hour;
- one(1) 40,000 litres capacity precast concrete tank complete with baffles, vents, access hatch and all required piping works to act as an anaerobic denitrification tank;
- one (1) 4,500 litres capacity pumping station (tank) complete with two (2) duplex controlled submersible sewage pumps, rated at 2.0 litres per second at 6.3 metres total dynamic head;
- **Bio-Filters:** nine (9) aerobic biofilters each having dimensions 2.44 metres diameter x 2.44 metres high, each filter rated for 4500 litres per day to 5000 litres per day, filled with light weight synthetic filter medium designed for a hydraulic loading rate of 2,000 litres per square metre per day and for an average flow of 42,500 litres per day, complete with

inlet spray nozzles, inflow distribution, effluent collection and ventilation system, complete with an effluent dividing chamber;

- **Effluent Dosing Tank:** two (2) 4,500 litres capacity tanks collecting effluent from one of the Bio-filters and discharging to the existing subsurface disposal system and re-circulating to the existing equalization/dosing tank, equipped with two (2) submersible pumps each rated at 3 litres per second at 13 metres total dynamic head, complete with one 4-way mechanical rotating valve distributing to four shallow buried trenches;
- **Subsurface Disposal System:** four (4) shallow buried trenches each 125 metres, laid in 300 millimetres wide by approximately 300 millimetres to 450 millimetres deep parallel trenches, excavated in the native soil with centre line spacing 2.5 metres, and each trench equipped with a centrally placed 25 millimetre diameter perforated distribution pipe and covered by a 300 millimetre diameter half-pipe chamber and back-filled with native soil, together with an automatic distribution valve on connection from the forcemain to the manifolds feeding the perforated distribution laterals, complete with clean-out valves and pressure gauge connectors on the laterals; and
- including all other controls, electrical equipment, instrumentation, piping, valves and appurtenances essential for the proper operation of the aforementioned sewage *Works* .

all in accordance with supporting documents listed in Schedule 'A'.

For the purpose of this environmental compliance approval, the following definitions apply:

"*Approval* " means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed herein;

"*BOD₅* " (also known as *TBOD₅*) means five day biochemical oxygen demand measured in an unfiltered sample and includes carbonaceous and nitrogenous oxygen demand;

"*CBOD₅* " means five day carbonaceous (nitrification inhibited) biochemical oxygen demand measured in an unfiltered sample;

"*Director* " means a person appointed by the Minister pursuant to section 5 of the *EPA* for the purposes of Part II.1 of the *EPA* ;

"*District Manager* " means the District Manager of the Guelph District Office of the Ministry;

"*E. Coli* " refers to the thermally tolerant forms of *Escherichia* that can survive at 44.5 degrees Celsius;

"*EPA* " means the Environmental Protection Act, R.S.O 1990, c.E.19, as amended;

"*Licensed Installer* " means a person who holds a licence under Article 2.12.3.1 of the Ontario Building Code;

"*Ministry* " means the Ontario Ministry of the Environment;

"*Owner* " means Emerald Lake Inc., and includes its successors and assignees;

"*Previous Works* " means those portions of the works previously constructed and approved;

"*Professional Engineer* " means a person entitled to practise as a Professional Engineer in the Province of Ontario under a licence issued under the Professional Engineers Act;

"*Proposed Works* " means the sewage works described in this *Approval* ;

"*Rated Capacity* " means the *Average Daily Flow* for which the *Works* are approved to handle;

"*Substantial Completion* " has the same meaning as "*substantial performance* " in the Construction Lien Act; and

"*Works* " means the sewage works described in this *Approval* and includes both *Previous Works* and *Proposed Works* .

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. GENERAL PROVISIONS

- 1.1 The *Owner* shall ensure that any person authorized to carry out work on or operate any aspect of the *Works* is notified of this *Approval* and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- 1.2 Except as otherwise provided by these Conditions, the *Owner* shall design, build, install, operate and maintain the *Works* in accordance with the description given in this *Approval* , the application for approval of the *Works* and the submitted supporting documents and plans and specifications as listed in this *Approval* .
- 1.3 Where there is a conflict between a provision of any submitted document referred to in this *Approval* and the Conditions of this *Approval* , the Conditions in this *Approval* shall take precedence, and where there is a conflict between the listed submitted documents, the document bearing the most recent date shall prevail.
- 1.4 Where there is a conflict between the listed submitted documents, and the application, the application shall take precedence unless it is clear that the purpose of the document was to amend the application.
- 1.5 The requirements of this *Approval* are severable. If any requirement of this *Approval* , or the application

of any requirement of this *Approval* to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this *Approval* shall not be affected thereby.

2. EXPIRY OF APPROVAL

- 2.1 The approval issued by this *Approval* will cease to apply to those parts of the *Works* which have not been constructed within **five (5) years** of the date of this *Approval* .

3. CHANGE OF OWNER

- 3.1 The *Owner* shall notify the *District Manager* and the *Director* , in writing, of any of the following changes within **thirty (30) days** of the change occurring:
- (a) change of *Owner* ;
 - (b) change of address of the *Owner* ;
 - (c) change of partners where the *Owner* is or at any time becomes a partnership, and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c.B17 shall be included in the notification to the *District Manager* ; and
 - (d) change of name of the corporation where the *Owner* is or at any time becomes a corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C39 shall be included in the notification to the *District Manager* .

4. CONSTRUCTION

- 4.1 The *Owner* shall ensure that the construction of the works is supervised by a *Licensed Installer* , as defined in the Ontario Building Code or a *Professional Engineer* , as defined in the Professional Engineers Act.
- 4.2 Upon construction of the works, the *Owner* shall prepare a statement, certified by a *Licensed Installer* or a *Professional Engineer* , that the *Works* are constructed in accordance with this *Approval* , and upon request, shall make the written statement available for inspection by *Ministry* staff and staff of the local municipality.

5. MONITORING AND RECORDING

The *Owner* shall, upon commencement of operation of the *Works* , carry out the following monitoring program:

- 5.1 All samples and measurements taken for the purposes of this *Approval* are to be taken at a time and in a location characteristic of the quality and quantity of the effluent stream over the time period being monitored.

- 5.2 Samples shall be collected of the **effluent** being discharged to the subsurface disposal system from an effluent dosing tank at the frequency specified, in Table 1, by means of the specified sample type and analyzed for each parameter listed and all results recorded:

Table 1 - Effluent Monitoring - (Effluent discharged to subsurface disposal system)	
Frequency	Once a month during the months of May, July, August and October
Sample Type	Grab
Parameters	<i>CBOD</i> , Total Suspended Solids, Total Phosphorus, Total Ammonia Nitrogen, Nitrate, Nitrite, Total Kjeldahl Nitrogen, pH, Temperature and <i>E-coli</i> .

- 5.3 Establish three (3) groundwater observation wells to monitor the shallow aquifer up-gradient of the disposal trenches, immediately down gradient of the disposal trenches, and at the property boundary in the down gradient flow path from the disposal trenches.

Table 2 - Groundwater Monitoring -(at down-gradient monitoring well)	
Frequency	Monthly (during the months of May, July, August and October)
Sample Type	Grab
Parameters	<i>CBOD</i> , Total Phosphorus, Total Kjeldahl Nitrogen, Nitrates, Nitrites, <i>E-coli</i> and pH..

- 5.4 The monitoring outlined pursuant to Condition 5.3 shall be undertaken for a period of at least **three (3) years** following the start up of the *Works*.
- 5.5 Prior to the startup of the *Works*, background groundwater quality must be established by collecting groundwater samples and having them analyzed for the parameters outlined in Table 3.
- 5.6 The Owner shall measure and record the daily volume of effluent being discharged to subsurface disposal system.
- 5.7 The methods and protocols for sampling, analysis and recording shall conform, in order of precedence, to the methods and protocols specified in the following:
- (a) the Ministry's Procedure F-10-1, "Procedures for Sampling and Analysis Requirements for Municipal and Private Sewage Treatment Works (Liquid Waste Streams Only), as amended from time to time by more recently published editions;
 - (b) the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater" (January 1999), ISBN 0-7778-1880-9, as amended from time to time by more recently published editions; and
 - (c) the publication "Standard Methods for the Examination of Water and Wastewater" (20th edition), as amended from time to time by more recently published editions.

- 5.8 The *Owner* shall retain for a minimum of **three (3) years** from the date of their creation, all records and information related to or resulting from the monitoring activities required by this *Approval* .
- 5.9 Following completion of **one (1) year** of operation of the sewage works, if the quality of effluent to the subsurface disposal system satisfies the objectives stipulated in Condition 6, and demonstrates consistently to attenuate nitrates to the levels claimed, as evidenced by the results of the monitoring program required by this condition, the *District Manager* may reduce the number of parameters and the required frequency of sampling.

6. EFFLUENT OBJECTIVES

- 6.1 The *Owner* shall use best efforts to design, construct and operate the *Works* with the objective that the concentrations of the materials named below as effluent parameters are not exceeded in the effluent being discharged to the subsurface disposal system.

Table 3 -- Effluent Objectives	
Effluent Parameter	Concentration Objective (milligrams per litre unless otherwise indicated)
CBOD ₅	10.0
Total Suspended Solids	10.0
Nitrate Nitrogen	5.0

- 6.2 The *Owner* shall include in all reports submitted in accordance with Condition 8 a summary of the efforts made and results achieved under this Condition.

7. OPERATIONS AND MAINTENANCE

- 7.1 The *Owner* shall prepare an operations manual within **six (6) months** of the introduction of sewage to the *Works* , that includes, but not necessarily limited to, the following information:
- (a) operating procedures for routine operation of the *Works* ; and
 - (b) inspection programs, including frequency of inspection, for the *Works* and the methods or tests employed to detect when maintenance is necessary.
- 7.2 The *Owner* shall maintain the operations manual current and retain a copy at the location of the *Works* for the operational life of the *Works* . Upon request, the *Owner* shall make the manual available to *Ministry* staff.
- 7.3 The *Owner* shall prepare and make available for inspection by *Ministry* staff, a maintenance agreement with the manufacturer of the treatment process/technology and a complete set of "as constructed" drawings within **one (1) year** of *Substantial Completion* of the *Works* . The maintenance agreement and drawings must be retained at the site and kept current.

- 7.4 The *Owner* shall ensure that adequate steps are taken to ensure that the area of the *Works* are protected from all forms of vehicle traffic and are not used for any purpose other than sewage disposal.
- 7.5 In the event a break-out is observed from the bed, the *Owner* shall do the following:
- (a) sewage discharge to that subsurface disposal system shall be discontinued;
 - (b) incident immediately reported verbally to the Spills Action Centre (SAC) at (416) 325-3000 or 1-800-268-6060;
 - (c) followed by a written report to the *District Manager* within **one (1) week** of the break-out;
 - (d) during the time remedial actions are taking place the sewage generated at the site shall not be allowed to discharge to a surface water body or to the environment; and
 - (e) sewage generated at the site shall be safely collected and disposed of through a licensed waste hauler to an approved sewage disposal site.
- 7.6 In the event the treatment process/technology experiences operational problems during its service life, the *Owner* shall do the following:
- (a) sewage discharge to the subsurface disposal system shall be discontinued;
 - (b) incident immediately reported verbally to the *District Manager* , followed by a written report within **one (1) week**;
 - (c) during the time remedial actions are taking place the sewage generated at the site shall not be allowed to discharge to a surface water body or to the environment; and
 - (d) sewage generated at the site shall be safely collected and disposed of through a licensed waste hauler to an approved sewage disposal site.

8. REPORTING

- 8.1 **One (1) week** prior to the start up of the operation of the *Works* , the *Owner* shall notify the *District Manager* (in writing) of the pending start up date.
- 8.2 The *Owner* shall prepare, and submit upon request, a performance report, on an annual basis, within **ninety (90) days** following the end of the period being reported upon. The first such report shall cover the first annual period following the commencement of operation of the *Works* and subsequent reports shall be submitted to cover successive annual periods following thereafter. The reports shall contain, but shall not be limited to, the following information:

- (a) a summary and interpretation of all monitoring data and a comparison to the effluent objectives outlined in Condition 6, including an overview of the success and adequacy of the *Works* ;
- (b) a tabulation of the daily volumes of effluent disposed through the subsurface disposal system during the reporting period;
- (c) a summary of all maintenance carried out on any major structure, equipment, apparatus, mechanism or thing forming part of the *Works* ; and
- (d) a description of any operating problems encountered and corrective actions taken.

Schedule 'A' forms part of this *Approval* and contains a list of supporting documentation / information received, reviewed and relied upon in the issuance of this *Approval* .

SCHEDULE 'A'

1. Application for Approval of Sewage Works submitted by Philip M. Keightley, M.Sc., P.Eng., B.K.L Engineering., and signed by Drago Hasnas, Owner/Manager, Emerald Lake Inc., dated January 26, 2011; and all supporting documentation and information; and
2. Approval Number 5058-5VDTJN, issued on March 11, 2004.

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is imposed to ensure that the *Works* are built and operated in the manner in which they were described for review and upon which approval was granted. This condition is also included to emphasize the precedence of Conditions in this *Approval* and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. The condition also advises the owners their responsibility to notify any person they authorized to carry out work pursuant to this *Approval* the existence of this *Approval* .
2. Condition 2 is included to ensure that the *Works* are constructed in a timely manner so that standards applicable at the time of *Approval* of the *Works* are still applicable at the time of construction, to ensure the ongoing protection of the environment.
3. Condition 3 is included to ensure that the *Ministry* records are kept accurate and current with respect to approved *Works* and to ensure that subsequent owners of the *Works* are made aware of this *Approval* and continue to operate the *Works* in compliance with it.
4. Condition 4 is included to ensure that the *Works* are constructed, and may be operated and maintained such that the environment is protected and deterioration, loss, injury or damage to any person or property is prevented.
5. Condition 5 is included to enable the *Owner* to evaluate and demonstrate the performance of the *Works* , on a continual basis, so that the *Works* are properly operated and maintained at a level which is consistent with the design objectives specified in this *Approval* and that the *Works* does not cause any impairment to the environment.
6. Condition 6 is imposed to establish non-enforceable effluent quality objectives which the *Owner* is obligated to use best efforts to strive towards on an ongoing basis. These objectives are to be used as a mechanism to trigger corrective action proactively and voluntarily before environmental impairment occurs.
7. Condition 7 is included to require that the *Works* be properly operated, maintained, and equipped such that the environment is protected. As well, the inclusion of an operations manual, maintenance agreement with the manufacturer for the treatment process/technology and a complete set of "as constructed" drawings governing all significant areas of operation, maintenance and repair is prepared, implemented and kept up-to-date by the owner and made available to the *Ministry* . Such a information is an integral part of the operation of the *Works* . Its compilation and use should assist the *Owner* in staff training, in proper plant operation and in identifying and planning for contingencies during possible abnormal conditions. The manual will also act as a benchmark for *Ministry* staff when reviewing the *Owner* 's operation of the *Works* .
8. Condition 8 is included to provide a performance record for future references, to ensure that the *Ministry*

is made aware of problems as they arise, and to provide a compliance record for all the terms and conditions outlined in this *Approval*, so that the *Ministry* can work with the *Owner* in resolving any problems in a timely manner.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).
5058-5VDTJN issued on March 11, 2004.**

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me and the Environmental Review Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:

1. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed

Pursuant to subsection 139(3) of the Environmental Protection Act, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The environmental compliance approval number;
6. The date of the environmental compliance approval;
7. The name of the Director, and;
8. The municipality or municipalities within which the project is to be engaged in

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5

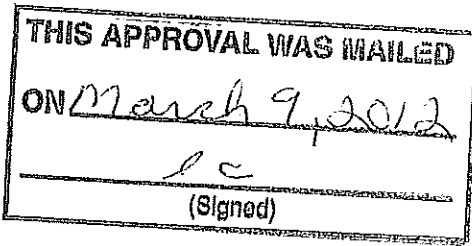
AND

The Director appointed for the purposes of
Part II.1 of the Environmental Protection Act
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 314-4506 or www.ert.gov.on.ca**

The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.

DATED AT TORONTO this 2nd day of March, 2012



Mansoor Mahmood, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

AA/

c: District Manager, MOE Guelph District Office
Philip M. Keightley P.Eng., BKL Engineering ✓



Ministry
of the
Environment

The Ontario Water Resources Act

WATER WELL RECORD

6708698

MUNICIP

CON

1. PRINT ONLY IN SPACES PROVIDED

2. CHECK ☒ CORRECT BOX WHERE APPLICABLE

11

COUNTY OR DISTRICT

TOWNSHIP BOROUGH CITY TOWN VILLAGE

CON., BLOCK, TRACT, SURVEY, ETC

LOT

DATE COMPLETED

DAY 21 MO May

LOG OF OVERBURDEN AND BEDROCK MATERIALS (SEE INSTRUCTIONS)

[illegible]

31

32

WATER RECORD

WATER FOUND AT - FEET		KIND OF WATER			
10-13	1 ☒ FRESH	3 ☐ SULPHUR	14		
	2 ☐ SALTY	4 ☐ MINERAL			
15-18	1 ☐ FRESH	3 ☐ SULPHUR	19		
	2 ☐ SALTY	4 ☐ MINERAL			
20-23	1 ☐ FRESH	3 ☐ SULPHUR	24		
	2 ☐ SALTY	4 ☐ MINERAL			
25-28	1 ☐ FRESH	3 ☐ SULPHUR	29		
	2 ☐ SALTY	4 ☐ MINERAL			
30-33	1 ☐ FRESH	3 ☐ SULPHUR	34		
	2 ☐ SALTY	4 ☐ MINERAL			

CASING & OPEN HOLE RECORD

INSIDE DIAM INCHES	MATERIAL	WALL THICKNESS INCHES	DEPTH - FEET	
			FROM	TO
10-11 6 1/2	1 ☒ STEEL 2 ☐ GALVANIZED 3 ☐ CONCRETE 4 ☐ OPEN HOLE	12 188	0	20
17-18 6 1/2	1 ☐ STEEL 2 ☐ GALVANIZED 3 ☐ CONCRETE 4 ☒ OPEN HOLE	19	20	67
24-25	1 ☐ STEEL 2 ☐ GALVANIZED 3 ☐ CONCRETE 4 ☐ OPEN HOLE	26		27-30

PLUGGING & SEALING RECORD

DEPTH SET AT - FEET		MATERIAL AND TYPE (CEMENT GROUT LEAD PACKER, ETC.)
FROM	TO	
10-13	14-17	
18-21	22-25	
26-29	30-33	80

PUMPING TEST	71
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PUMPING TEST

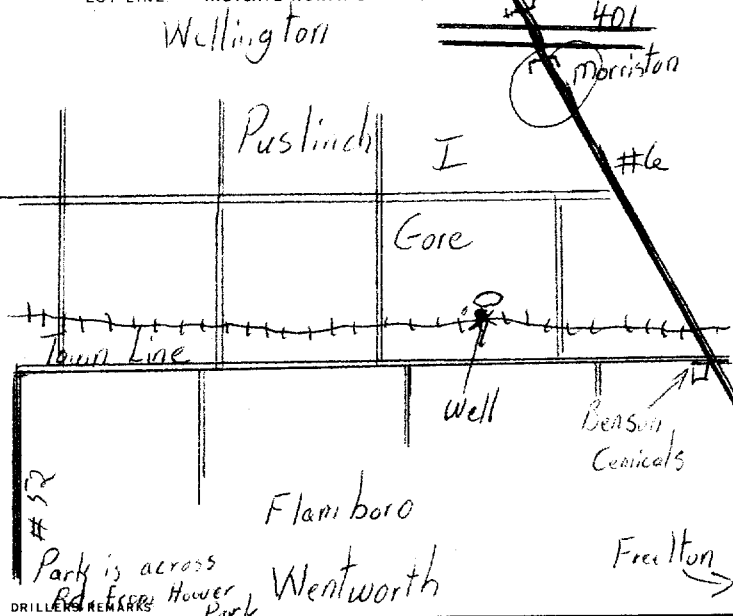
71

PUMPING TEST METHOD		10	PUMPING RATE		11-14	DURATION OF PUMPING	
1 ☒ PUMP 2 ☐ BAILER			100		GPM	1	15-16 HOURS 0 17-18 MINS
STATIC LEVEL	WATER LEVEL END OF PUMPING	25	WATER LEVELS DURING				1 ☐ PUMPING 2 ☐ RECOVERY
19-21	22-24		15 MINUTES	30 MINUTES	45 MINUTES	60 MINUTES	
15 FEET	67 FEET		15 26-28 FEET	15 29-31 FEET	15 32-34 FEET	15 35-37 FEET	
IF FLOWING, GIVE RATE		30-41	PUMP INTAKE SET AT			WATER AT END OF TEST	
		GPM				1 ☒ CLEAR 2 ☐ CLOUDY	
RECOMMENDED PUMP TYPE			RECOMMENDED PUMP SETTING		43-45	RECOMMENDED PUMPING RATE	
☐ SHALLOW ☐ DEEP			60		FEET	50 GPM	

50-53

LOCATION OF WELL

IN DIAGRAM BELOW SHOW DISTANCES OF WELL FROM ROAD AND LOT LINE. INDICATE NORTH BY ARROW.

**FINAL
STATUS
OF WELL**

- 1 ☒ WATER SUPPLY 5 ☐ ABANDONED, INSUFFICIENT SUPPLY
2 ☐ OBSERVATION WELL 6 ☐ ABANDONED POOR QUALITY
3 ☐ TEST HOLE 7 ☐ UNFINISHED
4 ☐ RECHARGE WELL

WATER USE

- 1 ☐ DOMESTIC 5 ☐ COMMERCIAL
2 ☐ STOCK 6 ☐ MUNICIPAL
3 ☐ IRRIGATION 7 ☐ PUBLIC SUPPLY
4 ☐ INDUSTRIAL 8 ☐ COOLING OR AIR CONDITIONING
☒ OTHER *Park Washington* ☐ NOT USED

METHOD OF DRILLING

- | | | | |
|---|--|---|----------------------------------|
| 1 | ☐ CABLE TOOL | 6 | ☐ BORING |
| 2 | ☐ ROTARY (CONVENTIONAL) | 7 | ☐ DIAMOND |
| 3 | ☐ ROTARY (REVERSE) | 8 | ☐ JETTING |
| 4 | ☒ ROTARY (AIR) | 9 | ☐ DRIVING |
| 5 | ☐ AIR PERCUSSION | | |

CONTRACTOR

NAME OF WELL CONTRACTOR Packham Well Drilling Inc.		LICENCE NUMBER 4207
ADDRESS 1335 Trinity Rd. Ancaster Ont.		
NAME OF DRILLER OR BORER Mervyn Packham		LICENCE NUMBER 4207
SIGNATURE OF CONTRACTOR	SUBMISSION DATE	

SUBMISSION DATE

DAY 21 MO. May YR. 76

OFFICE USE ONLY

DATA SOURCE	58	CONTRACTOR	59-62	DATE RECEIVED	040387	63-68	80
DATE OF INSPECTION			INSPECTOR				
REMARKS							

CSS.ES

MINISTRY OF THE ENVIRONMENT COPY

FORM NO. 0506-4-77 FORM 7



A225992

11-0164-00

Well Record

Regulation 903 Ontario Water Resources Act

Page 1 of 1

Measurements recorded in: ☐ Metric ☒ Imperial

Well Owner's Information

First Name	Last Name / Organization	E-mail Address	☐ Well Constructed by Well Owner
	Emerald Lake Trailer Resort & Waterpark		
Mailing Address (Street Number/Name)	Municipality	Province	Postal Code
7248 Gore Rd.	Puslinch	ON	N0B2J0
			Telephone No. (inc. area code)
			80067911853

Well Location

Address of Well Location (Street Number/Name)	Township	Lot	Concession
7248 Gore Rd.	Puslinch		
County/District/Municipality	City/Town/Village	Province	Postal Code
Wellington	Puslinch	Ontario	
UTM Coordinates Zone	Easting	Northings	Municipal Plan and Sublot Number
NAD 83	17571056748071003		
		Other	

Overburden and Bedrock Materials/Abandonment Sealing Record (see instructions on the back of this form)

General Colour	Most Common Material	Other Materials	General Description	Depth (m/ft)
	Topsoil			0 1
	Bedrock Dolostone			1 2
	Weathered Rock			2 3
	Bedrock			3 13

Annular Space			
Depth Set at (m/ft)	Type of Sealant Used (Material and Type)	Volume Placed (m³/ft³)	
0 7	Bentonite		
7 13	Sand		

Method of Construction		Well Use	
☐ Cable Tool	☐ Diamond	☐ Public	☐ Commercial
☐ Rotary (Conventional)	☐ Jetting	☐ Domestic	☐ Municipal
☐ Rotary (Reverse)	☐ Driving	☐ Livestock	☐ Test Hole
☒ Boring	☐ Digging	☐ Irrigation	☒ Monitoring
☐ Air percussion		☐ Industrial	☐ Cooling & Air Conditioning
☐ Other, specify		☐ Other, specify	

Construction Record - Casing				Status of Well	
Inside Diameter (cm/in)	Open Hole OR Material (Galvanized, Fibreglass, Concrete, Plastic, Steel)	Wall Thickness (cm/in)	Depth (m/ft)	From	To
2	PVC	1/8	0	7	

☐ Water Supply	☐ Replacement Well	☐ Test Hole	☐ Recharge Well	☐ Dewatering Well
☒ Observation and/or Monitoring Hole	☐ Alteration (Construction)	☐ Abandoned, Insufficient Supply	☐ Abandoned, Poor Water Quality	☐ Abandoned, other, specify
☐ Other, specify				

Construction Record - Screen				
Outside Diameter (cm/in)	Material (Plastic, Galvanized, Steel)	Slot No.	Depth (m/ft)	From To
2.25	PVC	10	7	13

Water Details		Hole Diameter	
Water found at Depth (m/ft)	Kind of Water: ☐ Fresh ☐ Untested ☐ Gas ☐ Other, specify	Depth (m/ft)	Diameter (cm/in)
Unknown		0 2.5	8
		2.5 13	3 1/8

Business Name of Well Contractor		Well Contractor's Licence No.
Aardvark Drilling Inc.		7 2 3 8
Business Address (Street Number/Name)		Municipality
25-C Lewis Road		Guelph
Province	Postal Code	Business E-mail Address
ON	N1H1E9	www.aardvarkdrillinginc.com
Bus. Telephone No. (inc. area code)	Name of Well Technician (Last Name, First Name)	
5198269340	AWT-Wright Tyler, WT-Gies Tim	
Well Technician's Licence No.	Signature of Technician and/or Contractor	Date Submitted
314134		20171000

Results of Well Yield Testing			
After test of well yield, water was:		Draw Down	
☐ Clear and sand free		Time (min)	Water Level (m/ft)
☐ Other, specify			
If pumping discontinued, give reason:		Static Level	
		1	1
Pump intake set at (m/ft)		2	2
Pumping rate (l/min / GPM)		3	3
Duration of pumping		4	4
hrs + min		5	5
Final water level end of pumping (m/ft)		10	10
If flowing give rate (l/min / GPM)		15	15
		20	20
Recommended pump depth (m/ft)		25	25
Recommended pump rate (l/min / GPM)		30	30
Well production (l/min / GPM)		40	40
Disinfected?		50	50
☐ Yes ☐ No		60	60

Map of Well Location

Please provide a map below following instructions on the back.

Comments:

See Attached Map #3

Well owner's information package delivered	Date Package Delivered	Ministry Use Only
☐ Yes ☐ No	Y Y Y Y M M D D D	Audit No. Z263111
	Date Work Completed	Oct 18 2017
		Received

17-0169-00

Legend,

Google Earth

© 2017 Google

Core Rd

300 m

OCT 16 2017 10:23:26 Z263111



Ontario

Ministry of
the Environment

Well Tag N

A 033276

(below)

Well Record

Regulation 903 Ontario Water Resources Act

55-05

Instructions for Completing Form

- For use in the Province of Ontario only. This document is a permanent legal document. Please retain for future reference.
- All Sections must be completed in full to avoid delays in processing. Further instructions and explanations are available on the back of this form.
- Questions regarding completing this application can be directed to the Water Well Management Coordinator at 416-235-6203.
- All metre measurements shall be reported to 1/10th of a metre.
- Please print clearly in blue or black ink only.

Well Owner's Information and Location of Well Information

First Name EMERALD LAKE	Last Name TRAILER RESORT	Mailing Address (Street Number/Name, RR, Lot, Concession) 7248 GORE RD. RR#2	
County/District/Municipality WELLINGTON	Township/City/Town/Village PUSLINCH	Province Ontario	Postal Code N0B-2T0
Address of Well Location (County/District/Municipality) WELLINGTON		Township PUSLINCH	Lot 29
RR#/Street Number/Name 7248 GORE RD. RR#2 PUSLINCH		City/Town/Village PUSLINCH	Concession GORE
GPS Reading NAD 83	Zone 17	Easting 570514	Northing 4806995
Unit Make/Model GARMIN		Mode of Operation: ☐ Undifferentiated ☒ Averaged ☐ Differentiated, specify _____	

Log of Overburden and Bedrock Materials (see instructions)

General Colour	Most common material	Other Materials	General Description	Depth From	Metres To
BROWN	LIMESTONE			0	30
BROWN	ROCK			30	65
TOTAL DEPTH 65'					

Hole Diameter		
Depth	Metres	Diameter
From	To	Inches
0	25	8 3/4"
25	65	6"

Water Record	
Water found at Metres 65 AT	Kind of Water
☒ Fresh ☐ Sulphur	☐ Gas ☐ Salty ☐ Minerals
☐ Other:	
☐ m ☐ Fresh ☐ Sulphur	☐ Gas ☐ Salty ☐ Minerals
☐ Other:	
After test of well yield, water was ☒ Clear and sediment free ☐ Other, specify _____	
Chlorinated	☒ Yes ☐ No

Construction Record			
Inside diam	Material	Wall thickness	Depth
centimetres INCHES		centimetres INCHES	Metres FT
From			To
Casing			
6"	☒ Steel ☐ Fibreglass ☐ Plastic ☐ Concrete ☐ Galvanized	.188	+2 25
Screen			
Outside diam	☐ Steel ☐ Fibreglass ☐ Plastic ☐ Concrete ☐ Galvanized	Slot No.	
No Casing or Screen			
☒ Open hole		25	65

Test of Well Yield				
Pumping test method	Draw Down	Recovery		
	Time min	Water Level Metres	Time min	Water Level Metres
SUB.				
Pump intake set at - (metres) 40 FT	Static Level	12'		
Pumping rate - (litres/min) 166 gpm	1	13	1	12
Duration of pumping 1 hrs + 0 min	2	13	2	12
Final water level end of pumping 13 FT	3	13	3	12
Recommended pump type. ☐ Shallow ☒ Deep	4	13	4	12
Recommended pump depth. 40 FT	5	13	5	12
Recommended pump rate. 206 gpm	10	13	10	12
If flowing give rate - (litres/min)	15	13	15	12
If pumping discontinued, give reason.	20	13	20	12
	25	13	25	12
	30	13	30	12
	40	13	40	12
	50	13	50	12
	60	13	60	12

Plugging and Sealing Record			☒ Annular space ☐ Abandonment
Depth set at - Metres	To	Material and type (bentonite slurry, neat cement slurry) etc.	Volume Placed (cubic metres)
0	25	BENTONITE SLURRY	

Method of Construction			
☐ Cable Tool	☒ Rotary (air)	☐ Diamond	☐ Digging
☐ Rotary (conventional)	☐ Air percussion	☐ Jetting	☐ Other
☐ Rotary (reverse)	☐ Boring	☐ Driving	
Water Use			
☐ Domestic	☐ Industrial	☒ Public Supply	☐ Other
☐ Stock	☐ Commercial	☐ Not used	
☐ Irrigation	☐ Municipal	☐ Cooling & air conditioning	
Final Status of Well			
☒ Water Supply	☐ Recharge well	☐ Unfinished	☐ Abandoned, (Other)
☐ Observation well	☐ Abandoned, insufficient supply	☐ Dewatering	
☐ Test Hole	☐ Abandoned, poor quality	☐ Replacement well	

Well Contractor/Technician Information	
Name of Well Contractor GRAHAM WELL DRILLING LTD	Well Contractor's Licence No. 2336
Business Address (street name, number, city etc.) RR#5 ROCKWOOD, ONT. N0B-2K0	
Name of Well Technician (last name, first name) WILSON TIM	Well Technician's Licence No. T-1924
Signature of Technician X	Date Submitted 05/10/31

Location of Well	
In diagram below show distances of well from road, lot line, and building. Indicate north by arrow.	
Audit No. 2 36462	Date Well Completed 05/10/12
Was the well owner's information package delivered? ☒ Yes ☐ No	Date Delivered 05/10/12

Ministry Use Only	
Data Source	Contractor 2336
Date Received NOV 09 2005	Date of Inspection 05/10/12
Remarks	Well Record Number

Directive

**Pursuant to section 7 of O. Reg. 319/08 (Small Drinking Water Systems)
made under the *Health Protection and Promotion Act*, R.S.O. 1990, c. H.7**

To:	<u>Emerald Lake Trailer Resort and Water Park</u>	Owner
address	<u>7248 Gore Rd</u>	Drago Hasnas
	<u>Puslinch, ON N0B 2J0</u>	
About:	<u>Emerald Lake Trailer Resort well supply</u>	Drinking Water System
address	<u>7248 Gore Rd</u>	ID Number
	<u>Puslinch, ON N0B 2J0</u>	766004077

I, Wendy Briggs, a public health inspector with Wellington-Dufferin-Guelph Public Health, on September 17, 2021 conducted a risk assessment of the small drinking water system noted above and have thereby determined that the requirements and actions contained in this Directive are necessary.

You are therefore directed to ensure that you and any subsequent owners and operators of the drinking water system follow these requirements and take these actions.

Pursuant to section 38 of O. Reg. 319/08, you have the right to request that the Medical Officer of Health of Wellington-Dufferin-Guelph Public Health review this Directive. The request must be made in writing and must be delivered to the medical officer of health no later than seven days after you receive this Directive. Your request may be

mailed or delivered to: 160 Chancellors Way, Guelph, ON N1G 0E1

or sent by fax to: 519-823-4905

This Directive takes effect when served and remains in effect even if you request a review.

Failure to comply with this Directive is an offence which carries, upon conviction, a maximum fine of \$5,000.00 for each day or part of a day that the offence occurs. If a corporation is the owner of the system, the maximum fine is \$25,000.00.


Wendy Briggs
Public Health Inspector

April 22, 2022

Date

Delivered to Drago Hasnas

April 22, 2022

Date

Delivered by Wendy Briggs

Part 1 Risk Category

The Ministry of Health and Long Term Care Risk Categorization (RCat) software has been used in this assessment and a risk category as shown to the right has been assigned to this system:

Low

Part 2 Water Treatment

Provide treatment as necessary and such equipment, supplies and processes as will normally result in finished water, when sampled at a point of use and tested, having no E. coli and no total coliforms. This will include such additional filters, equipment or chemicals as required to allow disinfection equipment or chemicals to function effectively. (This system has provided UV for primary treatment and chlorination for secondary treatment.)

Part 3 Sampling and Testing

Submit routine water samples to the laboratory as follows:

One sample after treatment and two distribution samples every month.

Test each routine sample for E. coli and for total coliform. Samples should be representative of the distribution system taken from a different location each time.

Submit special water samples to the laboratory as follows:

None required

Test each special sample for parameters listed below. Special sample results should not exceed the Maximum Allowable Concentration of the parameter indicated in O. Reg. 169/03.

Part 4 Operational Checks

Monthly, monitor the status of ultraviolet light disinfection equipment and record observations.

Twice a week, test for free available chlorine (FAC) residual in the distribution system and record test results. Chlorine residual should be taken when collecting water samples and recorded.

Part 5 Posting Warning Signs

The option to post signs as per section 7 (6) 7, 8 is not permitted.

Part 6 Records

Sections 10 and 11 of O. Reg. 319/08 require that certain records be retained and made available for review. In addition to those, **incidents of equipment breakdown, repair, test and routine maintenance shall be recorded, dated and signed and the record retained for at least 5 years.**

Part 7 Operator Training

Any operator of this system is required to be trained as follows and must be familiar with O. Reg. 319/08.

To successfully undergo such training provided through the Ministry of Environment as to be designated a Level 1 Basic Operator or training from another source that is equivalent.

Please note that directives in Parts 1 through 7 apply on the date specified in each Part, or if no date is specified, apply immediately. (section 7 (10))



Directive

**Pursuant to section 7 of O. Reg. 319/08 (Small Drinking Water Systems)
made under the *Health Protection and Promotion Act*, R.S.O. 1990, c. H.7**

To: Emerald Lake Trailer Resort and Water Park

Owner

address 7248 Gore Rd

Drago Hasnas

Puslinch, ON N0B 2J0

About: Emerald Lake Water Park well supply

Drinking Water System

address 7248 Gore Rd

ID Number

866BLKFS4

Puslinch, ON N0B 2J0

I, Wendy Briggs, a public health inspector with Wellington-Dufferin-Guelph Public Health, on September 17, 2021 conducted a risk assessment of the small drinking water system noted above and have thereby determined that the requirements and actions contained in this Directive are necessary.

You are therefore directed to ensure that you and any subsequent owners and operators of the drinking water system follow these requirements and take these actions.

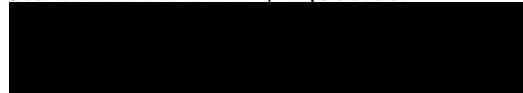
Pursuant to section 38 of O. Reg. 319/08, you have the right to request that the Medical Officer of Health of Wellington-Dufferin-Guelph Public Health review this Directive. The request must be made in writing and must be delivered to the medical officer of health no later than seven days after you receive this Directive. Your request may be

mailed or delivered to: 160 Chancellors Way, Guelph, ON N1G 0E1

or sent by fax to: 519-823-4905

This Directive takes effect when served and remains in effect even if you request a review.

Failure to comply with this Directive is an offence which carries, upon conviction, a maximum fine of \$5,000.00 for each day or part of a day that the offence occurs. If a corporation is the owner of the system, the maximum fine is \$25,000.00.


Wendy Briggs
Public Health Inspector

April 29, 2022

Date

Delivered to Drago Hasnas

April 29, 2022

Delivered by Wendy Briggs

Date

Part 1 Risk Category

The Ministry of Health and Long Term Care Risk Categorization (RCat) software has been used in this assessment and a risk category as shown to the right has been assigned to this system:

Low

Part 2 Water Treatment

Provide treatment as necessary and such equipment, supplies and processes as will normally result in finished water, when sampled at a point of use and tested, having no *E. coli* and no total coliforms. This will include such additional filters, equipment or chemicals as required to allow disinfection equipment or chemicals to function effectively. (This system has provided UV for primary treatment.)

Part 3 Sampling and Testing

Submit routine water samples to the laboratory as follows:

One treated sample from the snack bar every three months

*Test each routine sample for *E. coli* and for total coliform. Samples should be representative of the distribution system taken from a different location each time.*

Submit special water samples to the laboratory as follows:

None required

Test each special sample for parameters listed below. Special sample results should not exceed the Maximum Allowable Concentration of the parameter indicated in O. Reg. 169/03.

Part 4 Operational Checks

Monthly, monitor the status of ultraviolet light disinfection equipment and record observations.

Part 5 Posting Warning Signs

Post signs in public washrooms instructing users not to consume the water.

Part 6 Records

Sections 10 and 11 of O. Reg. 319/08 require that certain records be retained and made available for review. In addition to those, **incidents of equipment breakdown, repair, test and routine maintenance shall be recorded, dated and signed and the record retained for at least 5 years.**

Part 7 Operator Training

Any operator of this system is required to be trained as follows and must be familiar with O. Reg. 319/08.

Designate an operator who will fulfill the obligations of the regulation relating to sampling, testing and receipt of results and submission reports and notify the Medical Officer of Health with the name and address of the operator.

Please note that directives in Parts 1 through 7 apply on the date specified in each Part, or if no date is specified, apply immediately. (section 7 (10))



PERMIT TO TAKE WATER

Surface Water

NUMBER 1115-9WHQ5M

Reference Number 6880-9SSR3N

Pursuant to Section 34.1 of the Ontario Water Resources Act, R.S.O. 1990 this Permit To Take Water is hereby issued to:

Emerald Lake Inc.
7248 Gore Rd. R.R.#2
Puslinch, ON N0B 2J0

For the water taking from: Emerald Lake

Located at: 7248 Gore Rd Lot 29 Concession Gore
Puslinch, County of Wellington

For the purposes of this Permit, and the terms and conditions specified below, the following definitions apply:

DEFINITIONS

(a) "Director" means any person appointed in writing as a Director pursuant to section 5 of the OWRA for the purposes of section 34.1, OWRA.

(b) "Provincial Officer" means any person designated in writing by the Minister as a Provincial Officer pursuant to section 5 of the OWRA.

(c) "Ministry" means Ontario Ministry of the Environment and Climate Change.

(d) "District Office" means the Guelph District Office.

(e) "Permit" means this Permit to Take Water No. 1115-9WHQ5M including its Schedules, if any, issued in accordance with Section 34.1 of the OWRA.

(f) "Permit Holder" means Emerald Lake Inc..

(g) "OWRA " means the *Ontario Water Resources Act*, R.S.O. 1990, c. O. 40, as amended.

You are hereby notified that this Permit is issued subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. Compliance with Permit

1.1 Except where modified by this Permit, the water taking shall be in accordance with the application for this Permit To Take Water, dated January 12, 2015 and signed by Drago Hasnas, and all Schedules included in this Permit.

1.2 The Permit Holder shall ensure that any person authorized by the Permit Holder to take water under this Permit is provided with a copy of this Permit and shall take all reasonable measures to ensure that any such person complies with the conditions of this Permit.

1.3 Any person authorized by the Permit Holder to take water under this Permit shall comply with the conditions of this Permit.

1.4 This Permit is not transferable to another person.

1.5 This Permit provides the Permit Holder with permission to take water in accordance with the conditions of this Permit, up to the date of the expiry of this Permit. This Permit does not constitute a legal right, vested or otherwise, to a water allocation, and the issuance of this Permit does not guarantee that, upon its expiry, it will be renewed.

1.6 The Permit Holder shall keep this Permit available at all times at or near the site of the taking, and shall produce this Permit immediately for inspection by a Provincial Officer upon his or her request.

1.7 The Permit Holder shall report any changes of address to the Director within thirty days of any such change. The Permit Holder shall report any change of ownership of the property for which this Permit is issued within thirty days of any such change. A change in ownership in the property shall cause this Permit to be cancelled.

2. General Conditions and Interpretation

2.1 Inspections

The Permit Holder must forthwith, upon presentation of credentials, permit a Provincial Officer to carry out any and all inspections authorized by the OWRA, the *Environmental Protection Act*, R.S.O. 1990, the *Pesticides Act*, R.S.O. 1990, or the *Safe Drinking Water Act*, S. O. 2002.

2.2 Other Approvals

The issuance of, and compliance with this Permit, does not:

(a) relieve the Permit Holder or any other person from any obligation to comply with any other applicable legal requirements, including the provisions of the *Ontario Water Resources Act*, and the *Environmental Protection Act*, and any regulations made thereunder; or

(b) limit in any way any authority of the Ministry, a Director, or a Provincial Officer, including the authority to require certain steps be taken or to require the Permit Holder to furnish any further information related to this Permit.

2.3 Information

The receipt of any information by the Ministry, the failure of the Ministry to take any action or require any person to take any action in relation to the information, or the failure of a Provincial Officer to prosecute any person in relation to the information, shall not be construed as:

(a) an approval, waiver or justification by the Ministry of any act or omission of any person that contravenes this Permit or other legal requirement; or

(b) acceptance by the Ministry of the information's completeness or accuracy.

2.4 Rights of Action

The issuance of, and compliance with this Permit shall not be construed as precluding or limiting any legal claims or rights of action that any person, including the Crown in right of Ontario or any agency thereof, has or may have against the Permit Holder, its officers, employees, agents, and contractors.

2.5 Severability

The requirements of this Permit are severable. If any requirements of this Permit, or the application of any requirements of this Permit to any circumstance, is held invalid or unenforceable, the application of such requirements to other circumstances and the remainder of this Permit shall not be affected thereby.

2.6 Conflicts

Where there is a conflict between a provision of any submitted document referred to in this Permit, including its Schedules, and the conditions of this Permit, the conditions in this Permit shall take precedence.

3. Water Takings Authorized by This Permit

3.1 Expiry

This Permit expires on **September 30, 2025**. No water shall be taken under authority of this Permit after the expiry date.

3.2 Amounts of Taking Permitted

The Permit Holder shall only take water from the source, during the periods and at the rates and amounts of taking specified in Table A. Water takings are authorized only for the purposes specified in Table A.

Table A

	Source Name / Description:	Source: Type:	Taking Specific Purpose:	Taking Major Category:	Max. Taken per Minute (litres):	Max. Num. of Hrs Taken per Day:	Max. Taken per Day (litres):	Max. Num. of Days Taken per Year:	Zone/ Easting/ Northing:
1	Emerald Lake	Pond	Other - Recreational	Recreational	2,500	10	1,000,000	155	17 570340 4807316
		Dugout							
						Total Taking:	1,000,000		

3.3 Water taking under the authorization of this Permit shall only occur between May 1 and October 31 of each year from the date of issue to September 30, 2025.

3.4 Prior to taking of water under this Permit, the Permit Holder shall ensure that any and all applicable permits or authorizations are obtained from Federal and Provincial Agencies having legislative mandates in water resources management.

4. Monitoring

4.1 Under section 9 of O. Reg. 387/04, and as authorized by subsection 34(6) of the *Ontario Water Resources Act*, the Permit Holder shall, on each day water is taken under the authorization of this Permit, record the date, the volume of water taken on that date and the rate at which it was taken. The daily volume of water taken shall be measured by a flow meter or calculated in accordance with the method described in the application for this Permit, or as otherwise accepted by the Director. The Permit Holder shall keep all records required by this condition current and available at or near the site of the taking and shall produce the records immediately for inspection by a Provincial Officer upon his or her request. The Permit Holder, unless otherwise required by the Director, shall submit, on or before March 31st in every year, the records required by this condition to the ministry's Water Taking Reporting System.

5. Impacts of the Water Taking

5.1 Notification

The Permit Holder shall immediately notify the local District Office of any complaint arising from the taking of water authorized under this Permit and shall report any action which has been taken or is proposed with regard to such complaint. The Permit Holder shall immediately notify the local District Office if the taking of water is observed to have any significant impact on the surrounding waters. After hours, calls shall be directed to the Ministry's Spills Action Centre at 1-800-268-6060.

5.2 For Surface-Water Takings

The taking of water (including the taking of water into storage and the subsequent or simultaneous withdrawal from storage) shall be carried out in such a manner that streamflow is not stopped and is not reduced to a rate that will cause interference with downstream uses of water or with the natural functions of the stream.

5.3 The quality of water returned to the water body shall be substantially the same as the quality of water withdrawn.

6. Director May Amend Permit

The Director may amend this Permit by letter requiring the Permit Holder to suspend or reduce the taking to an amount or threshold specified by the Director in the letter. The suspension or reduction in taking shall be effective immediately and may be revoked at any time upon notification by the Director. This condition does not affect your right to appeal the suspension or reduction in taking to the Environmental Review Tribunal under the *Ontario Water Resources Act*, Section 100 (4).

The reasons for the imposition of these terms and conditions are as follows:

1. Condition 1 is included to ensure that the conditions in this Permit are complied with and can be enforced.
2. Condition 2 is included to clarify the legal interpretation of aspects of this Permit.
3. Conditions 3 through 6 are included to protect the quality of the natural environment so as to safeguard the ecosystem and human health and foster efficient use and conservation of waters. These conditions allow for the beneficial use of waters while ensuring the fair sharing, conservation and sustainable use of the waters of

Ontario. The conditions also specify the water takings that are authorized by this Permit and the scope of this Permit.

In accordance with Section 100 of the Ontario Water Resources Act, R.S.O. 1990, you may by written Notice served upon me and the Environmental Review Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 101 of the Ontario Water Resources Act, R.S.O. 1990, as amended, provides that the Notice requiring the hearing shall state:

1. The portions of the Permit or each term or condition in the Permit in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

In addition to these legal requirements, the Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The Permit to Take Water number;
6. The date of the Permit to Take Water;
7. The name of the Director;
8. The municipality within which the works are located;

This notice must be served upon:

AND

The Secretary
Environmental Review Tribunal
655 Bay Street, 15th Floor
Toronto ON
M5G 1E5
Fax: (416) 314-4506
Email:
ERTTribunalsecretary@ontario.ca

The Director, Section 34.1, Ministry of
the Environment and Climate Change
12th Floor
119 King St W
Hamilton ON L8P 4Y7
Fax: (905) 521-7820

Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal:

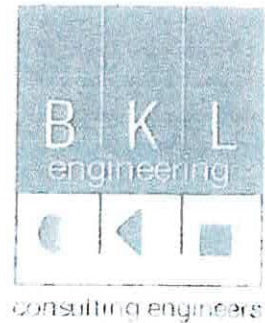
by telephone at (416) 314-4600 by fax at (416) 314-4506 by e-mail at www.ert.gov.on.ca

Dated at Hamilton this 14th day of May, 2015.


Belinda Koblik
Director, Section 34.1
Ontario Water Resources Act, R.S.O. 1990

Schedule A

This Schedule "A" forms part of Permit To Take Water 1115-9WHQ5M, dated May 14, 2015.



November 14th 2011

The Ministry of the Environment
Environmental Assessment and Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

Attn: Director, Section 53, OWRA

**Application for Amendment to Certificate of Approval 5058-5VDTJN
Emerald lake Inc., 7248 Gore Road, Puslinch, Ontario, N0B 2J0
MOE File Reference 0152-8DPP7K**

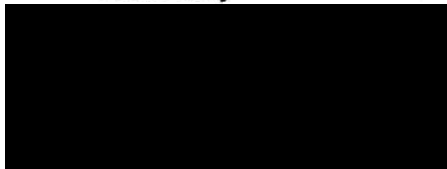
On behalf of our Client Emerald lake Inc. I am pleased to enclose one copy of our Supplementary Report in support of our Client's Application for Approval for Amendment to the existing Certificate of Approval # 5058-5VDTJN.

This additional information is required to satisfy action item 5.1.0 as amended arising from the MOE Guelph District Office review conducted of the above existing site by Michael Hindriks under inspection report 1835-869R6N a copy of which is bound into the application.

A copy of this application has been forwarded to the Guelph MOE district office.

Please do not hesitate to contact me should you have any questions.

Yours truly



Philip Keightley P.Eng.

Cc: Michael Hindriks - MOE District Office – Guelph
Drago Hasnas – Emerald Lake Inc.
Les Szpunar. P.Eng. - TEAM Aquatic Management

Bosher Keightley
Letham Ltd.
St. Clair Corporate Centre
265 North Front Street
Suite 204
Sarnia, Ontario
N7T 7X1 CANADA
Phone 519 336-4292
Fax 519 336-4394
E-mail info@bkleng.com

Emerald Lake Trailer Park and Water Park
Puslinch Township, County of Wellington
On site Sewage Disposal System
MOE Certificate of Approval 5058-5VDTJN

Supplementary Report
MOE Reference Number 0152-8DPP7K

1 Introduction

BKL Engineering were retained by Emerald Lake Inc. to review the current capacity of the Waterloo Biofilter based Sewage Treatment Plant servicing the Emerald Lake Trailer Park (which was designed by the undersigned principal of BKL Engineering in 1998 and constructed in 1999) in order to determine what additional measures (if any) are required to be implemented within the existing plant.

This request was made in response to MOE Inspection Report 1835-869R6N which identified a concern that Emerald Lake Inc. had established additional structures on the site that have increased the potential design requirements of the site and is now potentially exceeding the design flow of the system.

An application for an amendment to the existing Certificate of Approval 5058-5VDTJN was submitted on January 28th 2011 as MOE Reference Number 0152-8DPP7K and is currently under review.

As a result of the need to obtain additional data for water usage within the existing waterpark required to determine the actual design for discharge of effluent to the sanitary disposal system, which comprises a pre-existing septic tank and sub surface disposal bed more fully described in this supplementary report, and for which no existing approvals are on record, two additional items notated as 5.1.0 and 5.1.1 were added to the MOE Inspection Report 1835-869R6N by email dated December 15th 2010 as follows:

5.1.0

By September 30th 2011 the Client shall submit a completed application including all supporting documentation, applicable fee and a copy of this inspection report to the Ministry Environmental Assessment and Approvals branch at 2 St. Clair Ave. West, Toronto, On M4V 1L5, Floor 12A for an amendment Certificate of Approval (OWRA). The application shall include all provisions for all repairs, replacements and up-grades as recommended by the qualified person for ensuring the Site meets design requirements, design capacities and adequacy for the Site based on current design and capacity requirements, and to ensure environmental protection during emergency situations for the on-site water park.

5.1.1

By September 30th 2011 the Client shall provide the undersigned Provincial Officer written Confirmation of compliance with item 5.1.0 of this inspection report.

This date was extended to November 11th 2011 to allow for compilation and analysis of the data collected during the 2011 summer operating season for the waterpark.

2 Background

As identified in the second half of page 2 of the MOE Onsite Sewage Disposal Inspection Report 1835-869R6N, the Site (Emerald Lake Trailer Park, 7248 Gore Road, RR2, Puslinch, Ontario) consists of two property parcels operated and owned by Emerald Lake Inc.

The parcel located on the north side of the CP railway contains a seasonally operated waterpark which is serviced by on site portable toilets (4) and a washroom serviced by a 3,500 gallon septic tank discharging to a subsurface disposal bed of previously unknown size and age.

The parcel on the south side of the CP railway consists of a seasonally operated RV trailer park serviced by an existing sewage treatment and subsurface disposal works rated at 42,500 L/day.

BKL Engineering carried out a re-assessment of the south parcel under copy of a Report dated January 31st 2011 which determined measures required to be taken as a result of this re-assessment and which required an amendment of the existing certificate of Approval 5058-5VDTJN for which an application was submitted to the MOE Assessment and Approvals Branch in Toronto.

As the pre-existing serviced waterpark was never evaluated in the original application made in 1998 for site servicing for the development of the trailer park, this supplementary report has been prepared to assess the design requirements of the installed system and to determine whether the septic system already installed is adequate for the actual design and capacity requirement of the water park usage, or whether it requires expansion, upgrade or repairs meet these requirements.

3 Supplementary Data on Water Park collected for June to September 2011

In order to determine design requirements for sewage collection, treatment and disposal within the waterpark, the owner (Drago Hasnas of Emerald Lake Inc) installed a water meter on the dedicated water supply to the waterpark and maintained a daily log of water meter readings and water park occupancy for the entire 2011 summer operating season which commenced with opening on Wednesday June 1st 2011 and concluded on labour day weekend with the last day of operations being Sunday September 4th 2011.

We also reviewed daily operations within the water park, identified metered water use patterns for wash down, water park use and for personal use by staff and visitors in the wash rooms and park facilities.

The past summer was determined to be one of the busiest on record for the water park attendance with above average daily temperatures recorded for the busiest days and the data collected was therefore considered reliable for determination of average day and maximum day design for the pre-existing septic treatment and disposal system installed on site.

No account was made for use of the portable toilets in the determination of average day and maximum day design for the park in order to remain conservative in our design estimates.

In summary from the data collected total metered water use for the season was 296 m3 and the total number of day visitors to the park was 18,377.

From an analysis of the data by month and for the season we determined the following daily usage rates for washdown of equipment (including use of outside showers wasted to ground) per day, and for washroom use (to septic) per person:

Month	Days open to public	Number of Visitors	Water usage m3	Average wash water use (ltrs / day)	Average daily use (ltrs/person)
June	30	1,454	44	900	11.7
July	31	11,364	141.9	1,528	8.2
August	31	5,034	105.9	1,899	9.3
September	4	525	10.1	1,173	10.3
SEASON	96	18,377	301.9	1,280	9.74

From the above the average daily design flow to the septic system is calculated to be 1,865 ltrs/day for the season.

Average daily attendance during July (the busiest month) was 367 persons per day giving an average daily design flow for the on septic disposal system of 3,575 ltrs/day.

Based on this average day flow rate for the busiest month of July the design capacity of the septic tank is required to be 10,723 ltrs (2,837 US gallons).

The two chamber septic tank provided on site was found to be 3,000 US gallons or 11,340 ltrs capacity which is adequately sized for the design flow.

The existing disposal bed was measured up and found to consist of 4 number 50 ft lengths of standard 3 inch disposal tile (total disposal length of 200 ft or 61 metres) on a raised bed construction with the minimum required depth of 900 mm of separation from water table / rock. Based on an assumed T time of 5 cm/sec for the native sand and gravels located on site, this represents a design disposal capacity of 3,669 ltrs per day.

Thus the existing disposal bed matches the design capacity of the septic tank supplied. From an examination of the disposal bed and the surrounding areas there has been no evidence of any failures of the existing disposal bed to adequately treat and dispose of the effluent generated during the peak month average day seasonal flows as discussed above.

4 Review of Proposed Amendments to Existing Certificate of Authorisation.

The above review has continued to focus on the performance of the plant based only on hydraulic flow rates and not on the effects of the ongoing expansion of the park on biological loadings.

From the summary report prepared by TEAM Aquatic Management in my previous report the treated effluent from the existing plant has consistently met the requirements of the C of A in respect of reduction of BOD, suspended solids and phosphorus. The disposal of nitrogen (as nitrite) in excess of the target values set by the MOE continues to be a concern.

However as was demonstrated in the original C. of A. submission material prepared by the writer, the use of shallow trench disposal has shown the effectiveness of this disposal method on take-up of excess nitrates into the shallow root structures of existing vegetation during the summer disposal months. This is verified by the groundwater monitoring carried out, which has shown that nitrates discharged from the plant have had little or no impact on existing water quality in both the shallow and deep water tables.

To address the reduction of nitrates on the trailer park developed to the south of the railway, recommendations have been previously made by the Plant Operator TEAM Aquatic to modify plant operation to increase recirculation back through the Waterloo Biofilter units as well as better utilising the de-nitrification tankage added in 2006. On this basis we previously recommended that the number of Biofilter units in operation is increased to accommodate this mode of operation.

As this site north of the railway tracks has not previously been addressed we carried out a mass balance calculation to determine the effect of the use of the seasonal water park on groundwater nitrates based on the Reasonable Use approach adopted by the MOE for site developments in sensitive areas.

A copy of the mass balance equation is attached as Appendix A and demonstrates that the existing Class 4 septic system installed has a minimal impact on nitrate levels, and nitrate generated from the actual usage for 2011 contributed in the order of 0.37 mg/ltr per year to the underlying water table. This calculation assumes that there was no take up of nitrogen during the summer season which is extremely conservative assumption as previously demonstrated.

5 Summary of Proposed Amendments to Existing Certificate of Authorisation.

The following table updated from my report of January 31st 2011 lays out a comparison of each component of the trailer park site and the sanitary collection, treatment and disposal system referenced in the current Certificate of Approval.

Column (1) identifies the components.

Column (2) summarises what is specified in the current MOE C. of A. 5058-5VDTJN

Column (3) shows the current installed components "As Built"

Column (4) identifies the amendments proposed to the Certificate of Approval.

Component:	C.of A. 5058-5VDTJN	Current "As Built"	Proposed.
Waterpark on north side of railway.	Not Assessed	Class 4 septic system rated for 3,600 ltrs/day	Class 4 septic system rated for 3,600 ltrs/day
Serviced Trailers	200	210	240
Serviced washroom bocks	0	5	5
Recreation Centre / Assembly Hall	0	1	1
Existing serviced residential property & office	0	1	1
Un-serviced cabin / tent sites	0	38	40
Number of two compartment Septic tanks for pre treatment of sewage	11	12	13
Total Capacity of Septic Tankage (ltrs)	175,650	198,150	220,650
Pump stations in the low pressure collection network	8	9	10
Holding / Balancing Tanks @ 2 compartment 22,500 ltr capacity with pump(s) discharging to Waterloo Biofilters	2	2	2
Biofilters: Aerobic "Waterloo" Biofilters each rated for 4,500 to 5,000 ltrs per day.	10	9	16
Anaerobic De-nitrification tankage	1 x 40,000 ltr. tank	2 x 22,500 ltr	2 x 22,500 ltr
Chemical (molasses carbon source) dosing system with dosing pump etc.	1	1	1
4500 ltr capacity pumping station from denitrification tank(s) complete with 2 pumps rated at 2 ltrs/sec at 6.3 m TDH.	1	1	1
4500 ltr capacity effluent pumping station for recirculation and effluent disposal complete with 2 pumps rated at 3 ltrs/sec at 13 m TDH.	2	2	2
Subsurface Disposal System - consisting of 4 shallow buried trenches each 125m long.	1 x	1 x	2 x
Column (1)	Column (2)	Column (3)	Column (4)

Note: In the context of this table "Serviced" means that the site is provided with electricity, water and sewage connection. "Un-serviced" means that the site is not provided with a sanitary sewage connection but may be provided with electricity and water.

This report is prepared in response to MOE Inspection Report 1835-869R6N and is therefore being submitted to MOE Approvals Branch in conjunction with the previously completed Application for Amendment to the existing Certificate of Approval number 5058-5VDTJN, MOE reference 0152-8DPP7K.

November 11th 2011.

Report prepared by



Philip Keightley P. Eng.
For and behalf of BKL Engineering

Cc: Mike Hindricks - MOE Guelph District Office
Les Szpunar - Team Aquatic Management
Drago Hasna - Emerald Lake Inc.

Appendix A –
Mass Balance Calculation for Nitrates in Ground Water

Development Impact Assessment

Mass Balance Calculations for Existing Class 4 Septic Sytem at Emerald Lake Waterpark

Location: 7248 Gore Road, Puslinch, Wellington County (PIN# 71202-0052)
Part Lot 29, Cocession Gore, Puslinch north of railway.

	Ha	Acre	
Existing Lot size (Ha)	16.0000	39.54	1 hectare = 2.47105381 acres

Infiltration Rate Calculation

		I.F. %
Upper Soil Profile	Sand / Gravel	50
Relief	Flat	30
Cover	Grass and trees	15

Total Infiltration Factor 95

Average Annual Water Surplus (Hamilton) 175 mm

Annual Infiltration rate (Hamilton) 166.3 mm

Mass Balance Equation for Nitrate Loading is;

$$Q_t \times C_t = Q_s \times C_s + Q_p \times C_p$$

Where:

Q_t	=	Sum of Q_s and Q_p	
C_t	=	Maximum Nitrate Concentration (mg/L)	
Q_s	=	Volume of Sewage	178991.98 Seasonal discharge in Ltrs
C_s	=	Nitrate content of sewage	40 mg/L for Class IV septic
C_s	=	Nitrate content of sewage	20 mg/L for standard Waterloo Biofilter
C_s	=	Nitrate content of sewage	10 mg/L for Nitrifying Waterloo Biofilter
Q_p	=	Infiltration	26600000 L/year Existing lot area
C_p	=	N of shallow ground water	0.1 mg/L Downstream well monitoring

Allowable Nitrate levels within groundwater C_t = from overall development 10 mg/L

Nitrate levels gen. by development of lots C_t = $(Q_s \times C_s + Q_p \times C_p) / Q_t$

Existing development C_t = 0.37 mg/L Based on existing Class IV septic system

Ruth Snow | SnowCorp Accounting

From: Drago Hasnas <drago@emeraldlake.ca>
Sent: July 30, 2025 12:20 PM
To: Ruth Snow | SnowCorp Accounting
Subject: Fwd: Re: Waterloo Biofilter
Attachments: Emerald Lake Schematic (April 25, 2016).pdf; 0152-8DPP7K-14.pdf

----- Forwarded message -----

From: Brady Straw <Brady@waterloo-biofilter.com>
Date: Jul 30, 2025 at 10:54 AM -0400
To: drago@emeraldlake.ca <drago@emeraldlake.ca>
Subject: Re: Waterloo Biofilter

Hi Drago,

I think this email train along with the attached schematic has everything you are looking for.

The nine (9) nitrifying PE tanks can treat a maximum of 45,000 L/day. We then suggested to send a maximum of 35,000 L/day to the denitrifying PE tanks to help with denitrification. The polishing PE tanks then receive all the sewage for removal of BOD added during denitrification.

Regards,

Brady Straw, B.Sc.
Head of Engineering



Waterloo Biofilter Systems Inc.

65 Massey Road, Suite C
Guelph ON N1H 7M6

Office: 519-856-0757 x180

Mobile: 519-546-6693

www.waterloo-biofilter.com

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From: Brady Straw <Brady@waterloo-biofilter.com>
Sent: Friday, August 4, 2017 12:32 PM
To: drago@emeraldlake.ca <drago@emeraldlake.ca>
Subject: RE: Waterloo Biofilter

Hi Drago,

I would start off using approximately 1 L of chemical for every 2,000 L of sewage and then you can adjust it moving forward. Have the chemical dose a little bit every time you dose sewage to the three (3) denitrifying PE tanks.

Regards,

Brady Straw, B.Sc.

Head of Engineering

Waterloo Biofilter Systems Inc.
143 Dennis Street
PO Box 400
Rockwood ON N0B 2K0
Tel: 519-856-0757 x 180
Fax: 519-856-0759
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From: Brady Straw
Sent: May-15-17 2:22 PM
To: 'drago@emeraldlake.ca' <drago@emeraldlake.ca>
Subject: FW: Waterloo Biofilter

Hi Drago,

Attached again are the specifications on the carbon we use.

Regards,

Brady Straw, B.Sc.

Head of Engineering

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From: Brady Straw

Sent: April-26-16 1:36 PM

To: emeraldlake@bellnet.ca

Cc: Greg Corman <Greg@waterloo-biofilter.com>; Glenn Pembleton <Glenn@waterloo-biofilter.com>; Dan Brownlee <Dan@waterloo-biofilter.com>; Chris James <cjames@waterloo-biofilter.com>

Subject: RE: Waterloo Biofilter

Hi Drago,

Attached is an updated schematic based on our conversation.

The cost for the sim/tech inline filter, two (2) 230 V submersible effluent pumps with 2" fittings, and alternating duplex timer control panel is \$2400 (plus HST). You already have the pumps, fittings, and control panel and we will get you the inline filter as soon as it comes in.

Based on our conversation yesterday I think it makes the most sense to top up the foam in the original tanks evenly. This means sending slightly more foam than I had originally budgeted and the cost is \$10,615 (plus HST) versus the original budget I gave of \$9838. This includes thirty-six (36) bags of foam with four (4) bags to be installed in each of the nine (9) original PE tanks. We are then going to send an additional six (6) bags for you to store inside and install in the six (6) new tanks midway through the summer after the foam has settled. We are then also sending twenty-four (24) bags of our black reticulated foam with four (4) bags to be installed in each of the three (3) denitrifying PE tanks and three (3) polishing PE tanks.

To try and get an estimate on the volume of molasses to use we need the COD concentration of the product you are using. However you could consider using the MicroC 2000 carbon source that we have been using at other sites. The MicroC 2000 has a very high COD concentration and likely requires significantly less volume than using molasses. Based on your average flow rates we estimate that you would need about two (2) 1000 L totes over the operating season. Each tote is \$2200. You could likely use your existing metering pump setup.

We are hoping to deliver the foam early Thursday morning and we will have someone there to help you put it in the tanks. Dan will be in touch regarding the timing of the foam delivery on Thursday.

Regards,

Brady Straw, B.Sc.
Head of Engineering

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From: Brady Straw

Sent: April-22-16 2:38 PM

To: 'emeraldlake@bellnet.ca' <emeraldlake@bellnet.ca>

Cc: Greg Corman <Greg@waterloo-biofilter.com>; Glenn Pembleton <Glenn@waterloo-biofilter.com>; Dan Brownlee <Dan@waterloo-biofilter.com>

Subject: RE: Waterloo Biofilter

Hi Drago,

Attached is a schematic to go along with the description from the email below.

The cost to top of five of the denitrification/polishing tanks with our regular foam and all six of them with a top 6-8" layer of our reticulated foam is \$9838 delivered to site (plus HST). This is a reduced price compared with what we would normally sell this foam for. We have both of these foams in stock.

The cost for the sim/tech inline filter and 230 V simplex timer control panel is \$1000 (plus HST). Unfortunately we just shipped our last of both these products (what are the chances) and are awaiting new deliveries.

Regards,

Brady Straw, B.Sc.
Head of Engineering

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From: Brady Straw

Sent: April-21-16 2:44 PM

To: 'emeraldlake@bellnet.ca' <emeraldlake@bellnet.ca>

Cc: Greg Corman <Greg@waterloo-biofilter.com>; Glenn Pembleton <Glenn@waterloo-biofilter.com>

Subject: Waterloo Biofilter

Hi Drago,

As we briefly discussed yesterday, in order to improve performance we recommend a few modifications to the process.

Just adding the new PE tanks to the front end of the system along with the existing ones will not achieve further denitrification. The effluent will be highly nitrified but without an enhanced denitrification process following, the nitrate will still be elevated. The existing nine (9) PE tanks are sufficient to handle the up-front flow.

Adding molasses to an empty tank that receives nitrified Biofilter effluent will only provide limited denitrification. Adding pumps to the denitrification tank and dosing a closed loop to three (3) PE tanks will provide a much higher level of denitrification.

Also, all of the flow is currently being sent through a single PE tank at the end of the train. This is way too much water for a single tank to treat and remove the BOD added by the molasses and denitrification tank. Dosing three (3) PE tanks from the 4500 L dosing tank will provide the necessary polishing.

Below is how we recommend reworking the system to provide the optimal treatment:

- Two (2) 22,500 L balance tanks pumping to
- Nine (9) PE tanks
 - 50% draining by gravity to the balance tanks
- 50% draining by gravity to 40,000 L the denitrification tank
 - Molasses addition to the denitrification tank
 - Install new pump(s) operating on a timer in the denitrification tank
 - Pump a maximum of 35,000 L/day to three (3) PE tanks operating on a closed loop; shut off air fans on these PE tanks and close off the vents to the outside
 - PE tanks drain by gravity back into the 40,000 L denitrification tank
- 40,000 L denitrification tank continues to overflow by gravity to
- 4500 L dosing tank pumping on a timer to
- Three (3) PE tanks draining by gravity to
- Disposal tank

Let me know if you have any questions on this setup.

Regards,

Brady Straw, B.Sc.
Head of Engineering

Waterloo Biofilter Systems Inc.

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Rockwood ON N0B 2K0

Tel: 519-856-0757 x 180

Fax: 519-856-0759

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7248 Gore Rd – D14-HAS – 1st Submission Comment Summary to Deem Complete

Consultant	Comments
Township Building Department	Please provide a scaled site plan showing all existing buildings and their sizes located on the Emerald Lake property.
Harden Environmental	We are satisfied that the application is complete. We will provide a technical review at a later date.
Township Bylaw	No comment
Township Fire	No comments
County Planning	The County is satisfied the application can be deemed complete. Formal comments will be provided next round. Thank you!
Source Water	The property is not located within a wellhead protection area, issues contributing area, or intake protection zone. It does not require a Section 59 notice under the Clean Water Act. There are no significant drinking water threat policies that apply at this time. If the site is operational during the winter, it is strongly recommended that the applicant, or person responsible for winter maintenance activities, develop and implement a salt management plan that uses best management practices to protect drinking water sources within the area. The plan should reference the location of wellhead protection areas and intake protection zones within proximity to the site.
Township Roads	No comments
NPG Planning - Township Planner	See attached letter
GEI – Township Engineer	See attached letter
Dougan – Township Ecologist	A scoped EIS has been provided following approval of the TOR. Technical review of the EIS will be completed during the next round.
GRCA	Pending



June 2, 2026

Monika Farncombe
7404 Wellington Road 34,
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**
7248 Gore Road
RE: Zoning By-law Amendment Application

NPG Planning Solutions Inc. (NPG) has been retained to comment on whether required information and materials have been provided regarding a Zoning By-law Amendment application for 248 Gore Road (Subject Lands). The Zoning By-law Amendment Application is required to bring the current operation into compliance. Per the documents submitted, no new construction is being proposed as part of the application.

A pre-consultation meeting was held for the Zoning By-law Amendment Application in August of 2025 and a list of requirements for a complete application was provided to the applicant.

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

For the Zoning By-law Amendment Application:

- Planning Justification Report prepared by MHBC dated May 2026
- Scoped Environmental Impact Study prepared by Aboud dated April 24, 2026;
- Environmental Noise and Vibration Letter prepared by SLR Consulting (Canada) Ltd dated February 6, 2026;
- Covering Letter prepared by MHBC dated May 15, 2026;
- Function Servicing Report and Appendices prepared by Clearford Waterworks Inc dated January 29, 2026;

- Nitrate Impact Letter prepared by Clearford Waterworks Inc. dated April 19, 2026

Comments

1. Determination of Completeness:

- a) For the Zoning By-law Application, the application should be deemed incomplete until the required documents outlined in section 2 of this letter have been provided.

2. Additional Requirements:

The following plans/studies are required to deem the Zoning By-law Amendment application complete:

- a) Our understanding is that the Zoning By-law Amendment would rezone lands currently zoned Natural Environment to site-specific Resort Commercial, permit more recreational vehicles and introduce year-round tent camping and cabin on the site, which are characterized by a higher density of human occupancy and activity. Please provide an analysis whether the proposal complies with Guideline #10 in Publication 853 and submit an MDS I setback analysis from livestock barns as necessary.
- b) Property Index Map and Parcel Registers (including all PIN Printouts and Legal Instruments)

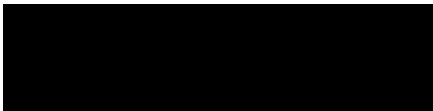
3. Technical Comments:

- a) The Subject Lands are within the Protected Countryside of the Greenbelt Plan. An application to expand a major recreational use, which include serviced campgrounds, shall also be accompanied by a conservation plan demonstrating how water, nutrient and biocide use shall be kept to a minimum, including through the establishment and monitoring of targets in accordance with Section 4.1.2.3. The requested Zoning By-law Amendment application involves expanding the scale of the serviced travel trailer park to include cabins, tent camping as well as permission for up to 272 recreational vehicles. We note that a Nitrate Impact Letter and a Functional Servicing Report have been submitted. We defer to the Township's engineer and hydrogeologist to determine if these reports satisfy the requirement of a "conservation plan" as outlined in the Greenbelt Plan.
- b) Furthermore, Section 4.2.3.4 of the Greenbelt Plan requires applications for development and site alteration in the Protected Countryside to be accompanied by a stormwater management plan. We defer to the Township's engineer to determine if this has been submitted.
- c) A Schematic Site Plan was included as part of the Planning Justification Report. In the next submission, please submit a separate Site Plan drawing that include

additional information as follows:

- ii. Legal description of the Subject Lands;
 - iii. A Zoning Matrix, identifying the Township Zoning By-law's applicable regulations, including General Provisions;
 - iv. The location of all existing and proposed buildings and structures, their footprints and setbacks to property lines;
 - v. The location of existing and proposed private servicing systems and their setbacks from property lines;
 - vi. Parking spaces and drive aisles;
 - vii. The landscaped area, driveways and their materials should be clearly distinguished;
 - viii. The extent of the proposed Natural Environment Zone and setback from nearest buildings and structures;
 - ix. The Township has a Site Plan and drawing requirements checklist to aid in the preparation the Site Plan which can
https://puslinch.ca/wpcontent/uploads/2020/09/Site-Plan-andDrawing_Guidelines.pdf.
- d) The Draft Zoning By-law should include a Schedule that shows all of the proposed zoning amendments.
 - e) We require spatial information in the form of an AutoCAD drawing or ArcGIS file that illustrates the property boundaries, the extent of the natural heritage features and the proposed zone boundaries.
 - f) Please advise if the Consent application for the proposed Lot Line Adjustment has been submitted.
 - g) More fulsome technical comments will be provided once the applications are deemed complete and circulated for a technical review.

Sincerely,



Jeremy Tran, MCIP, RPP
 Manager, Urban Design & Development Planning
NPG Planning Solutions Inc.
jtran@npgsolutions.ca

June 1, 2026

GEI Project No. 2501655 – 125006-009

VIA CLOUDPERMIT: Township of Puslinch

Township Application No. D14-HAS

Monika Farncombe
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0

Re: ZBA 1st Submission
7248 Gore Road (Emerald Lake Trailer Park)
Puslinch, ON

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed first submission documents for Zoning By-Law Amendment and Consent (lot line adjustment) applications received on May 19, 2026, in support of existing uses on the subject lands located at 7248 Gore Road in the Township of Puslinch.

It is our understanding that there is no proposed development. The applicant is requesting an amendment to accommodate 272 sites for recreational vehicles, cabins and tents. The original agreement only allows up to 200 trailers, but following an inspection by the Ministry of Environment, upgrades to the septic system were previously completed to allow more trailers.

A pre-consultation meeting was held on August 21, 2025.

1. Documents Received

All plans and studies required from an engineering perspective have been submitted.

The following documents were received as part of this submission and will be reviewed by GEI at a later date:

- Cover Letter, prepared by MHBC Planning, dated May 15, 2026.
- Functional Servicing Report, prepared by Clearford Waterworks, dated January 29, 2026.
- Functional Servicing Report Appendices, including:
 - Dwg. No A1 – Site Plan (Rev. 3), prepared by Millington & Associates, dated September 24, 2025.

- Dwg. No A2 – Water Shutoffs Valves & Septic Systems (Rev. 3), prepared by Millington & Associates, dated September 24, 2025.
- As-Built Site Plan, prepared by MIG Engineering, dated January 2023.
- As-Built Site Plan, prepared by BKL Engineering, dated May 2011.

The following documents were received as part of this submission and will be reviewed by Township staff and other consultants at a later date:

- Environmental Noise and Vibration Letter, prepared by SLR Consulting, dated February 6, 2026.
- Nitrate Impact Letter, prepared by Clearford Waterworks, dated April 19, 2026.
- Scoped Environmental Impact Study, prepared by Aboud & Associates, dated April 24, 2026.
- Planning Justification Report, prepared by MHBC Planning, dated May 2026.

2. Additional Documents Required

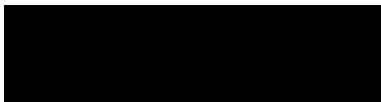
All plans and studies required from an engineering perspective have been submitted and additional documents are not required. We are in support of this application being deemed complete at this time.

Technical review of the submitted documents will be completed at a later date.

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.
Senior Project Engineer