

Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

August 28, 2026

Township of Puslinch
C/O Ms. Monika Farncombe
7404 Wellington County Road 34
Puslinch, ON
N0B 2J0

RE: Proposed Arkell Development – Response to NPG Planning Solutions (June 19, 2026)
605 Arkell Road and Part of Lots 7, 8, 9
Concession 10
Township of Puslinch
County of Wellington

Dear Ms. Farncombe:

Please find attached our response to the comments raised by NPG Planning Solutions (“NPG”) in their August 14, 2026 correspondence.

The following table sets out the comments from NPG (and our responses). The structure of the table generally follows the format provided in the NPG comment letter (dated August 14, 2026).

Comment #	NPG Comment	SAI Response
3 a) OPA	Require OPA to determine consistency with PPS.	Understood. We submitted the OPA documents a couple of months ago. Please let us know if you have not received these documents yet.
3. b) Draft Plan	NPG will update comments related to zoning following the review of the Draft Plan.	Understood. We feel that the Holding provision will assist the Township.
3. c) MDS – 930 Watson Road South	NPG recommends excluding the lands affected by the MDS setback from the ZBA.	Understood. The affected lands are small in size and located immediately adjacent to the GJR. The applicant is not proposing to establish housing in this location so we would have no issues with this approach.

3. d) Concept Plan	i) Blocks 46 and 48 do not meet minimum lot frontage requirements. ii) 5 m road widening to be confirmed.	Understood. i) This will be resolved at the draft plan stage. We think this area will be deeded to the Township. ii) This matter will be resolved at the draft plan stage.
3. e) Draft Zoning Bylaw	i) Draft ZBA may need to be updated once the Draft Plan is submitted. ii) 605 Arkell Road was mislabeled 603 Arkell Road. iii) Stormwater management facilities should be requested as a permitted use. iv) Noise study setback of 55 m – how is this addressed in the ZBA. v) No immediate plan for the remaining plantation that is outside the proposed subdivision.	Thank you for your comments. These comments are very helpful. i) Understood. ii) Agreed. iii) Understood and agreed. iv) We had thought that this would be set out as a condition of the Draft Plan and did not require special zoning provisions. v) Understood. There is no immediate plan for the plantation. I think that we need to wait for the input from Council and the public before we finalize the thought process on the plantation. It is our view that the plantation requires forest management as it is in poor health and is a safety concern. We feel that the plantation, if properly managed, would provide a good visual barrier to the GJR. We want to keep the plantation as it will be a benefit to the future residential development. We had proposed that perhaps the Township would want the lands as a park. If not, the lands could be included with an abutting lot, subject to necessary restrictions on development within the plantation.

3. f) Comments on Noise and Vibration Feasibility Study.	i) Please ensure alignment between the extent of the study area of the NVFS and the extent of lands subject to the proposed ZBA application. ii) Draft ZBA proposes minimum rear yard of 6 m and interior side yard of 2 m including Lots 1-5. Please confirm if the noise evaluation in Section 3.2.3 Table 4, Figures 2 and 3 of the Noise Study would need to be updated to analyze these building locations for potential worst-case impact. iii) please confirm that the 2.7 m high acoustic barrier is proposed for Lot 1 is not anticipated to be located with the required sight triangle. iv) 4.26 sets out the requirement for a 46m x 46m sight triangle. Is relief required.	i) We will forward your comments to our acoustic consultant for a response. We do not feel that the processing of the OPA or ZBA applications needs to be held up to address this matter. ii) We will ask our noise consultant. iii) iv) 4.26.2 of the Zoning Bylaw indicates: “where a street intersects a railway at grade or such greater distances as may be required from time to time by the Canadian Transportation Commission the standard is 46 m.” It is understood that Road A does not intersect the railway right-of-way at grade. Therefore there should be no conflict with this provision and relief is not required. Perhaps, NPG could explain why they believe that relief is needed? This would be most helpful.
3. g) ARU and Home Industry permissions	The PJR should provide additional justification for	We don't understand. ARU's are a recognized method that the Province has established in provincial legislation as one of the main methods of addressing rental housing. There

to be assessed.	the ARU and home businesses permissions.	will be no impacts on the neighbourhood by having ARU's in the proposed development. Home businesses are an important component of the local economy. Home businesses could result in a reduction of traffic resulting from the proposed development, as a home owner could work from home. We do not think that any additional justification is required. Servicing for the ARU will follow the normal requirements as part of the OBC.
3. h) Plantation	i. Township ecologist has noted SWH within the plantation and the Greenland designation should be considered. ii. NPG to provide comments on the OPA. iii. Should the plantation be rezoned to NE.	We disagree that the plantation should be considered SWM and we disagree that the plantation should be redesignated Greenland and re-zone NE.
3. i. Archaeology	Stage 1-2 Archaeological Assessment needed for 605 Arkell Road.	Agreed. This study is currently under progress. This requirement could be set out as a condition of Draft Plan approval.
3. j. Parkland dedication and DC's	Parkland dedication and DC's may be required.	Understood.

We trust that you will find these comments to be of assistance. When we receive the responses from our acoustical engineers, we will forward them immediately to the Township. In the interim, should you have any concerns or questions, please do not hesitate to contact me.

Yours truly,

Robert Stovel

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P. Ag

Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

August 27, 2026

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

**RE: Response to Environmental Impact Study Peer Review
Part of Lots 7–9, Concession 10 (Arkell)
Township of Puslinch, County of Wellington
Official Plan Amendment OP-2006-06 / Zoning By-law Amendment P10/2006**

Stovel and Associates Inc. (SAI) has reviewed the July 9, 2026 peer review prepared by Azimuth Environmental Consulting, Inc. regarding the Environmental Impact Study (EIS) prepared by SAI in May 2026.

Azimuth noted two key technical review considerations – Significant Wildlife Habitat Assessment and Species at Risk. Please find below our responses to these two matters below.

1. Significant Wildlife Habitat – Eastern Wood-pewee

Azimuth recommends that the Eastern Wood-pewee be acknowledged as Significant Wildlife Habitat (SWH) and that the potential impacts to Significant Wildlife Habitat for Special Concern and that Significant Wildlife Habitat for Special Concern and Rare Wildlife Species be discussed in the Impact Assessment.

SAI Response:

SAI acknowledges Azimuth's comment but respectfully disagrees that the plantation should be considered as Significant Wildlife Habitat. We have attempted to contact Azimuth and discuss this matter, but at the time of preparing this letter, we have not that discussion.

Our view is that the Eastern Wood-pewee utilizes many habitat types as part of its life cycle, including open areas, deciduous-mixed-coniferous woodlands, forest clearings, edges of farm woodlands and plantations. In the local and regional area, there are many of these types of habitats. Therefore, the limited intrusion into the plantation will not result in a negative impact on this species.

The Eastern Wood-pewee is not ranked S1-S3. This species is common throughout southern Ontario.

The Species Conservation Act (SCA) replaced Ontario's Endangered Species Act ("ESA"). The associated Species at Risk in Ontario ("SARO") List was replaced and Special Concern species were deleted. Therefore, the criterion related to species identification as "special concern" on the SARO list under the former ESA is no longer relevant.

It is our respectful opinion that, regardless of whether Azimuth is of the view that the plantation is SWH or whether SAI is of the view that the plantation is not SWH, the important takeaway is that the habitat species will still be protected as only minor encroachment into the plantation is proposed. Our recommendations in the EIS note the following key considerations:

- Work windows that recognize and protect breeding birds and birds protected under the Migratory Birds Convention Act be implemented as a condition of draft plan approval; and
- Minimal disturbance into the plantation. Setbacks from the plantation are largely regarded with only minor encroachments anticipated. We propose a setback the proposed development from the plantation. Rear yard setbacks and dripline setbacks (i.e. dripline plus 10 m) will be utilized to ensure protection. This will be reviewed in more detail once the Draft Plan of Subdivision is prepared and the detailed delineation of the lot fabric are prepared by an OLS. A Tree protection and management Plan has been recommended as a condition of draft plan approval.

2. Species at Risk – Butternut

Azimuth notes that Ontario Regulation 830/21 is no longer applicable following changes to the provincial species-at-risk framework and recommends that the Butternut tree be reassessed closer to the time of development. Azimuth further notes that registration and a Conservation Plan may be required depending upon the health and status of the tree at that time.

SAI Response:

SAI acknowledges the legislative update. Our client has retained Williams and Associates, a professional forestry consulting company, to address the requirements set out by the MECP. Williams has been in contact with MECP regarding the onsite butternut tree. We recommend that satisfactory clearance by the MECP be required as a condition of draft plan approval.

Conclusion

We trust that the foregoing satisfactorily addresses the comments raised by Azimuth Environmental Consulting and that the details of these concerns could be implanted

through conditions of Draft Plan approval of the proposed subdivision.

Should the Township or its peer reviewer require any additional information or clarification, please do not hesitate to contact the undersigned.

Yours truly,

Robert Stovel

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P. Ag.

cc: Shawn Marsh, Timberworx Custom Homes Inc.



September 11, 2026

Monika Farncombe
7404 Wellington Road 34,
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**
605 Arkell Road & Part of Lots 7, 8, 9, and Concession 10
RE: Application for Zoning By-law Amendment – 2nd Technical Review

NPG Planning Solutions Inc. (NPG) has been retained to provide comments on a Zoning By-law Amendment Application on lands known as Part of Lots 7, 8, 9 and Concession 10 and part of the lands municipally known as 605 Arkell Road ("Subject Lands").

The applicant is proposing a residential subdivision consisting of 44 single detached dwelling lots, a park, and a stormwater management block on The Subject Lands. The Subject Lands are approximately 20.57 hectares in size and have 260 meters of frontage along Arkell Road and 118 meters of frontage along Watson Road South. The Subject Lands contain a single detached dwelling and an accessory structure on the 605 Arkell Road Property, the rest of the Subject Lands are vacant. Surrounding uses consist of agricultural and rural residential uses. In addition, the southwestern portion of the Subject Lands abut the Guelph Junction Railway.

The Subject Lands are located outside of the Grand River Conservation Authority's (GRCA) regulation limit, however, there is a plantation and a Significant Wildlife Habitat on the Subject Lands.

This is the sixth submission for a Zoning By-law Amendment (ZBA) application. As part of the submission, NPG has reviewed the following additional documents:

- Response to Environmental Impact Study Peer Review prepared by Stovel and Associates Inc., dated August 27, 2026; and
- Response Matrix prepared by Stovel and Associates Inc., dated August 28, 2026.

Technical Comments

1. Application Support:

- a. At the moment, we are unable to recommend support for the application.

2. Additional Requirements:

- a. Technical comments below should be addressed to the Township's satisfaction.

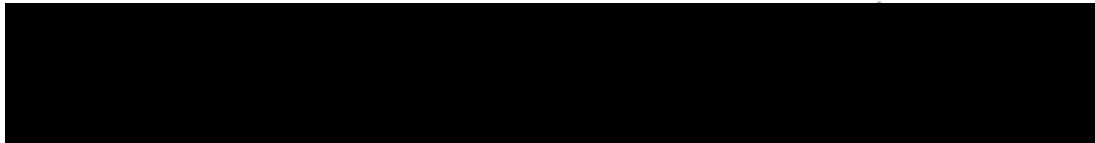
3. Technical Comments:

- a. With respect to the draft Zoning By-law Amendment, we offer the following comments:
 - i. Our comments dated August 14, 2026, with respect to the draft Zoning By-law Amendment remain applicable as outlined below.
 - ii. An updated Draft Zoning By-law is required to be provided once the Draft Plan of Subdivision is submitted and circulated. We expect the requested land uses to be site-specific and reflect the draft plan.
 - iii. The schedule of the Draft Zoning By-law incorrectly references the property municipally known as 605 Arkell Road as "603 Arkell Road". Please provide an updated draft Zoning By-law addressing this.
 - iv. "Stormwater management facilities" should be requested as a permitted use. Please provide an updated draft Zoning By-law addressing this.
 - v. The applicant noted that the minimum lot frontage requirements for Blocks 46 and 48 will be resolved at the Draft Plan of Subdivision stage and that these blocks will be deeded to the Township. We will provide detailed comments on this at the Draft Plan of Subdivision stage; however, our comments dated August 14, 2026, regarding the deficient lot frontage requirements for Blocks 46 and 48 remain applicable.
 - vi. As previously noted, the Noise and Vibration Feasibility Study (NVFS) recommends a minimum setback of 55 metres from the railway right-of-way for all dwellings. The study's recommendation regarding the minimum required setback for all dwellings should be incorporated into the proposed Zoning By-law Amendment.
 - vii. The Guelph Junction Railway indicated that they require a minimum 15-metre setback for all buildings and structures and no planting of tree canopies is permitted within 8 metres from their property line. These requirements should be incorporated into the proposed Zoning By-law Amendment as well.

- b. Please provide an updated Planning Justification Report (PJR) that addresses the policy issues raised in the Official Plan Amendment 1st Technical Review letter dated September 1st, 2026.
- c. With respect to the remaining plantation area, we offer the following comments:
 - i. We understand the applicant has not decided on the future plan for the plantation. We will provide more comments on this matter, including the appropriate zoning permissions, when the intention is clear and the Draft Plan of Subdivision is circulated for comments.
 - ii. Our previous comments requested the EIS to provide additional analysis to determine whether the extent of the Eastern Wood-pewee, if considered significant wildlife habitat, should be rezoned and redesignated accordingly. We defer to the Township's ecologist to determine if this area qualifies as Significant Wildlife Habitat and may provide more comments if necessary.
 - iii. The Environmental Impact Study (EIS) did not assess proposed residential uses on the remaining plantation area. The Agricultural Impact Assessment (AIA) noted that a portion of the plantation area is impacted by the MDS setbacks. Additionally, the NVFS excludes the plantation from its study extent. Given this, the applicant should provide more justification for proposing to rezone and redesignate the plantation area to Hamlet Residential Zone and Hamlet Area designation, respectively. This may include updating these studies to evaluate the impact of permitting residential uses within the plantation area.
- d. With respect to our previous comments pertaining to the sight triangle, we offer the following comments:
 - i. Section 4.26.2 states that a sight triangle is required "*where a street intersects a railway right-of-way at grade*", which is applicable to the intersection of Watson Road South and the GJR railway right-of-way, and not the intersection of Watson Road South and the proposed Road A. The sight triangle distance is to be calculated between the point of intersection of the two lot lines and their respective points of intersection with Watson Road and the GJR railway right-of-way.
 - ii. Based on the above, please consider if the proposal would require relief from Section 4.26 of the Puslinch Zoning By-law and update the draft Zoning By-law accordingly. Figure 4 of the NVFS shows the 2.7-metre acoustic barrier for Lot 1 located at the intersection of the GJR and Watson Road South, which appears to be within the required 46m x 46m sight triangle as required by Section 4.26.2 of the Puslinch Zoning By-law.

- e. With respect to our previous comments pertaining to additional residential units (ARUs) and home businesses, we offer the following comments:
 - i. Section 4.4.6 of the County OP states that Local Municipalities may permit Additional Residential Units if deemed appropriate, including consideration of servicing. Section 6.11 permits local commercial within the Hamlet designation where compatible and where adequate levels of service can be provided.
 - ii. The applicant is proposing to permit ARUs and home businesses on decreased lot sizes which have implications for water quality and water supply, impacting overall site suitability. Updated Nitrate Impact Assessment and Groundwater Supply Assessment are required to assess the impacts of the ARUs and home businesses. The PJR should be updated to address these policies and justify why these uses are suitable and can be permitted.
- f. Parkland dedication and Development Charges may be required in accordance with the prevailing Township's by-laws.

Sincerely,



Jeremy Tran, MCIP, RPP
 Manager, Urban Design & Development Planning
NPG Planning Solutions Inc.
jtran@npgsolutions.ca

Lichheng Lim, MCIP, RPP
 Senior Planner
NPG Planning Solutions Inc.
llim@npgsolutions.ca

Monika Farncombe

From: Alexa Pompilio-Grant <apompilio@azimuthenvironmental.com>
Sent: September 3, 2026 1:54 PM
To: Monika Farncombe
Cc: Lisa Moran
Subject: RE: Arkell - Response to Azimuth - 08/27/2026
Attachments: EIS Comment Matrix_Issued.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

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Good afternoon Monika,

Azimuth has reviewed the response letter provided by Stovel and Associates (dated August 27, 2026) and the comments are generally accepted. The comments in the letter however only address the comments we had summarized in our Peer Review letter; the comments in the issued comment matrix have not be addressed (see attached). Please let Stovel and Associates know that we still require a response for the remaining comments.

Further, in the letter issued by Stovel, they mentioned that they had attempted to contact Azimuth to discuss the comment related to Eastern Wood-pewee. We however did not receive an email or call/voicemail and therefore are not sure how they tried to contact us. If you could ask them, that would be appreciated.

Thanks in advance.

Regards,



Alexa Pompilio-Grant, H.B.Sc.

Terrestrial Ecologist

Azimuth Environmental Consulting, Inc.

642 Welham Road Barrie, ON L4N 9A1

Office: 705-721-8451 x225

Cell: 705-794-2233

www.azimuthenvironmental.com

Providing services in hydrogeology, terrestrial and aquatic ecology, environmental engineering, and arborist assessments.

From: Alexa Pompilio-Grant

Sent: Monday, August 31, 2026 11:12 AM

AEC21-130 Part of Lots 7-9, Concession 10 (Arkeil), Township of Puslinch, County of Wellington - Azimuth Comment/Response Matrix Appendix A (July 9, 2024)			
Comment #	1st Submission Comment	Applicant's 1st Response	Azimuth 1st Response Comment
Natural Heritage Technical Comments			
Introduction	Section 1		
1	Section 1: Relevant policy from the Species Conservation Act and Species at Risk Act has not been outlined in the report. Please revise accordingly.		
Description of Study Approach and the Natural Environment	Section 3		
2	Section 3 (Description of Study Approach and the Natural Environment): In addition to the list of background sources reviewed as part of the EIS, it is recommended the following additional sources be considered: -Ministry of Natural Resources Wildlife Values Area mapping -Naturalist (NHIC) Rare Species of Ontario -Atlas of Mammals of Ontario		
3	Section 3 (Description of Study Approach and the Natural Environment): The Butternut Health Assessment (BHA) was completed on May 11, 2023 yet the NHR document <i>Butternut Assessment Guidelines, Assessment of Butternut Tree Health for the Purposes of the Endangered Species Act, 2007</i> states that "an assessment will be considered to have been conducted during the leaf-on season if it was conducted between the dates of May 15 and August 31." Therefore, the BHA was completed outside of the leaf-on season. Notwithstanding, based on the data presented in Appendix H (Butternut Assessment), the same conclusion (the classification of the Butternut as Category 2) would have been reached if the BHA occurred during leaf-off conditions and a 100% live crown percentage was assumed.		
4	Section 3 General Comment: The EIS outlines that "the only vegetation communities that were described are hedgerows and the onsite plantation". A cultural meadow community is identified on the Ecological Land Classification Map Figure 5 in addition to an unlabeled (woodland?) community (in proximity to where the Eastern Wood-pewee was documented). A community description for these areas should be included in the EIS. Further, the report does not include an ELC description for the coniferous plantation (CUP3) identified on the Ecological Land Classification Map Figure 5. A description of this community is requested.		
5	Section 3.3 (Description of Plantation) and 3.4 (Description of Hedgerows): The ELC descriptions for the mixed plantation and hedgerows do not include a summary of species present below the canopy within the sub-canopy, understorey and ground layers. Please update these sections to provide a more thorough description of the vegetation layers.		
6	Ecological Land Classification Map Figure 5: The legend is missing the ELC descriptions for all of the vegetation communities identified within the study area. Further, the community where Eastern Wood-pewee was documented is not labeled on the figure. It is requested that the figure is updated to include these details. Additionally, the vascular plant list (Appendix B Addendum) includes communities a species list for TAGM5a and TAGM5b. The figure only identifies TAGM5 communities (not a/b). Please update the figure accordingly.		
7	Section 3.6 Description of Bats: While Azimuth is generally in agreement with the reports habitat assessment for SAR bats, it should be noted that Red Bat, Hoary Bat and Tri-colored Bat are not mentioned in the assessment and these species can utilize deciduous canopy features for maternity roosting. Their habitat should be broadly characterized or refuted. Azimuth notes that at least some of the deciduous elements within the hedgerows and plantation appear to be suitable for Red Bat and Hoary Bat roosting, if not Tri-colored Bat as well. It is also noted that Ministry of the Environment, Conservation and Parks (MECP)'s Bat Survey Standards Note (2022) states that there is no minimum tree size for potential bat roosting habitat (i.e. 10cm DBH is not a minimum size threshold), however it is acknowledged that trees <10cm DBH generally provide few potential interior access points for bats.		
8	Section 3 General Comment: The EIS does not appear to provide a list of incidental wildlife observations, yet the ToR provided by SAI indicated that this data would be reported. Please update the report to provide this information.		
Significant Features	Section 4		
9	With regards to Butternut, the EIS outlines that since "less than five Category 3 and less than fifteen Category 2 butternut trees will be killed as a result of construction, no replacement planting will be required, as outlined in Ontario Regulation 830/21 Section 25(3)." Ontario Regulation 830/21 was made under the Endangered Species Act, 2007 (ESA) which was replaced by the Species Conservation Act (SCA) on March 30, 2026. Ontario Regulation 830/21 is therefore no longer applicable. It is recommended that the Butternut tree be re-assessed closer to the time of development to confirm its health status. Registration for the removal of the Butternut may be required should it be deemed to be 'healthy'. A Conservation Plan may be required as part of the registration as per Schedule 1 of Ontario Regulation 75/26 under Ontario's SCA.		
10	Section 4.2.2 (Eastern Wood-pewee): The EIS states that "the onsite plantation is not considered to be critical to the life functions of this species [Eastern Wood-pewee]". The breeding bird survey data provided by Colville Consulting Inc. however indicates that this species demonstrated confirmed breeding given that an adult was seen leaving or entering nest site in circumstances indicating an occupied nest (breeding code – AE). Further, the EIS states that "the onsite plantation is not considered to be significant wildlife habitat". As per the Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E for Special Concern and Rare Wildlife Species, "the area of the habitat to the nearest ELC scale that protects the habitat form and function is the SWH, this must be delineated through detailed field studies. The habitat needs to be easily mapped and cover an important life stage component for a species e.g. specific nesting habitat or foraging habitat." Azimuth recommends that Eastern Wood-pewee is acknowledged as Significant Wildlife Habitat and therefore that Significant Wildlife Habitat for Special Concern and Rare Wildlife Species is discussed in the Impact Assessment.		
11	Secant 4 General Comment: Figure 10 includes an "estimated edge of plantation". As per SAI's ToR, woodland boundaries were to be delineated. Please clarify whether the plantation dripline was estimated using aerially imagery or using a handheld GPS on-site.		
12	Appendix B (Working Vascular Plant List): The vascular plant species list appears to capture a sufficient number of species to accurately define the ELC communities. Please update Appendix B Addendum to include the date(s) of the ELC and vegetation survey.		
13	Appendix C (Significant Wildlife Habitat Screening): The assessment for Wildlife Habitat: Special Concern and Rare Wildlife Species states that "no species of special concern or provincially rare species (S1-S3) [were] found onsite. Not SWH." As per Comment #10, this assessment should be updated to consider Eastern Wood-pewee.		
14	Appendix D (Species at Risk Screening): The assessment for Yellow-banded bumblebee states that "field edges and roadsides on the site and in the study area may provide suitable foraging habitat" but an assessment of potential impacts to this species is not included in the report. Please provide an assessment as to whether there are anticipated impacts to Yellow-banded Bumblebee as a result of the proposed development.		

15	Appendix D (Species at Risk Screening): The assessment for Eastern Wood-pewee indicates that there is potential for this species to occur on-site as a single bird was inventoried at the edge of the plantation. Based on the breeding bird survey completed by Colville Consulting Inc., an Eastern Wood-pewee was confirmed to be breeding as an adult was documented leaving or entering the nest site in circumstances indicating an occupied nest (breeding code AE). Further, the assessment for Eastern Meadowlark indicates that no individuals were observed during the 2025 survey and that there is potentially suitable nesting habitat on adjacent lands. The breeding bird survey completed in 2023 by Colville Consulting Inc. indicated that an Eastern Meadowlark was heard calling from lands east of the property during the second and third survey. The assessment should be updated to reflect the results from the breeding bird surveys.		
16	Appendix D (Species at Risk Assessment): The Species at Risk assessment should be expanded to consider Red Bat, Hoary Bat and Silver-haired Bat.		
Impact Assessment	Section 5		
17	Figure 9 (Environmental Constraints): Please confirm that the orange line depicted on the figure pertains to the woodland dripline and label on the legend accordingly.		
18	Section 5.1 (Impact Assessment) and Section 5.2 (Mitigation Measures): As noted in Comment #9, the Impact Assessment and Mitigation Measures should be updated as it relates to Butternut to reflect replacement of the ESA with the SCA.		
19	General Comment: Refer to Comment #13 and #14 above regarding Significant Wildlife Habitat for Special Concern and Rare Wildlife Species (Eastern Wood-pewee and Yellow-banded Bumblebee), and provide discussion within the impact assessment. There is no expectation that this will change the conclusions of the report.		
20	Section 5.2 (Mitigation Measures): While vegetation removal work windows for breeding birds are mentioned in Section 4.2.2. (Eastern Wood-pewee Description), it is recommended that this mitigation measure is outlined within Section 5.2 of the report to ensure compliance with the Migratory Birds Convention Act. Further, as per direction from MECF, an active timing window for SAR bats of April 1 - November 30 is advised. The more restrictive timing window of March 15 - November 30 is applicable when there is potential for Eastern Small-footed Myotis. Please update Section 5.2 accordingly.		
Policy Conformity	Section 6		
21	Section 6.1: Policy conformity statements presented in this section may require additional review/updates based on comments provided throughout this EIS peer review. Further, compliance with the SCA and the Species at Risk Act should be discussed.		