

Polocorp Development
51, 55 and 57 Hawkesville Road
St. Jacobs, Township of Woolwich
2nd Submission Draft Plan and 4th Submission OPA and ZBA

Date: June 09, 2026

Comment #	1st Submission Comment	Developer Response	2nd Submission Comment	Responsibilities	Developer Response	Status
Environmental Impact Study						
<u>Section 3.1</u>						
1	Section 3.1 provides a summary of the existing physiography and topography of the subject property, including a description of surface soils. The description of surface soils includes a discussion of soils observed as part of a single soil sample collected by the Consultant. This section of the report notes that further soil analysis will be completed in the summer. The Consultant should confirm if the additional sampling was completed, and if the results of this additional sampling modifies the description of existing soil conditions or changes the assessment of impacts.	Further soil analysis was completed during the summer (7/26/2024). The results only confirm the extent of the MAM (wetland) polygon and confirming the existence of a vegetation community does not affect the descriptions of existing soil conditions nor the assessment of impacts. This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 3.2.1</u>						
2	Section 3.2.1 of the EIS notes that 10 ELC polygons were detected within the study area (i.e. subject lands + 120 area surrounding); however, twenty-five polygons are listed within Table 2. The Consultant should clarify the number of polygons within the study area.	The text has been clarified to state the total number of polygons detected within the subject and adjacent lands is 25 with 11 unique vegetation communities, confirmed with the ELC mapping. This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 3.3.3</u>						
3	Section 3.3.3 notes a total of 193 call sequences were recorded; primarily Northern Hoary Bat and other low-frequency bats (Silver-haired bat and Big Brown Bat), noting that these species are not considered at risk in Ontario. In January of 2025 both Silver-haired bat and Northern Hoary Bat were listed as Endangered species in Ontario. The Consultant should confirm if the presence of these additional SAR bats influences the results of the impact assessment.	We can confirm that the additional SAR bats detected do not influence the results of the impact assessment, so long as the removal of buildings and trees providing suitable habitat does not impact critical life history windows of SAR bats. Updated recommendations for enhancement of these additional SAR bats detected during field surveys will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 3.4.1</u>						
4	Section 3.4.1 of the report should be updated to include the additional SAR bat species observed on the subject property.	The table and accompanying text in section 3.4.1. has been updated to include the two additional SAR bat species. This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 3.4.5</u>						
5	Section 3.4.5 provides a summary of the wetland features present on the subject property and includes a review of the wetland and comparison to GRCA Policy Analysis for Development Within Anthropogenic Wetlands. The Consultant should confirm whether the results of this analysis have been shared with GRCA, and / or if GRCA has provided any comments in regard to the potential development within the wetland on the subject property. The consultant and/or design team should ensure that coordination with other disciplines such as functional servicing and geotechnical is undertaken regarding the assumptions / expectations in Table 6. Should any of the expectations in Table 6 change, a secondary review of GRCA policy criteria should be undertaken to ensure conformity.	We have received comments from Angela Wang at GRCA (5/27/2025) and are in the process of addressing these.	Noted. The comments received should be provided within the Appendix of the revised EIS so that the Township has record of them. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	Dougan undertook a site walk with GRCA, as a result a Revised EIS was submitted on May 15, 2026	Complete
<u>Figure 4 / 5</u>						
6	The description of Figures 4 and 5 within the EIS suggests that one is looking downstream (Figure 4), and one is facing upstream (Figure 5); however, the image appears to be the same for both figures. The Consultant should update these figures as necessary.	The correct Figure 5 (facing upstream) photo has been inserted into the report. This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 4.1.2</u>						
7	Section 4.1.2 notes that to reduce the risk of damaging or disturbing bird nests and contravening the MBCA, vegetation clearing will occur between August 16 and March 31. The report then follows to say that vegetation clearing should not take place within the active nesting season between approximately April 1 and August 31 (allows for a vegetation clearing window of September 1 to March 31). The Consultant should clarify which vegetation clearing window is to apply at the subject property.	The incorrect timing window has been removed from the text, leaving on the correct timing window (vegetation clearing permitted from September 1 to March 31). This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 4.2.2</u>						
8	Section 4.2.2 should be updated to reflect the additional SAR bat species that were observed on the subject property.	The text in section 4.2.2. has been updated to include the two additional SAR bat species. This will be provided in a revised EIS.	Noted. No further comment. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
<u>Section 8.3.3</u>						

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9	Section 8.3.3 recommends the construction of 0.18 ha replacement pond (minimum size) as a method of habitat enhancement for the loss of the existing wetland feature, with specific consideration for overwintering turtles and amphibian breeding habitat. The proposed pond design elements included in Section 8.3 appear to be appropriate for developing similar offsetting habitat, and reduced distance to the Conestoga River for the proposed pond location may provide for increase movement to and from the feature. The consultant / design team should ensure during future stages of the property development that the pond design incorporates design elements as presented in the EIS, with consideration to replicating existing features to the extent possible. The construction of this feature should also be discussed with the Conservation Authority given that the feature is proposed to be placed within the flood plain of Conestoga River. The results of the discussion should be provided to the Municipality, and included as correspondence within the EIS as warranted.	We will ensure the habitat enhancement design incorporates all designed elements presented within the EIS. This will be provided in a revised EIS.	Noted. Any discussion with GRCA regarding this feature should also be included in the revised EIS. This comment is carried forward for tracking purposes, and the new information will be reviewed when the revised EIS is submitted.	Environmental Consultant	A Revised EIS was submitted on May 15, 2026	Complete
Phase One Environmental Site Assessment						
Section 1.0 / 2.0						
10	Section 1.0 of the Phase I ESA notes that the work was completed for due diligence purposes. Section 2.0 of the report indicates that the scope of Phase I ESA was generally in accordance with requirements of CSA Standard Z768-01 (R2022). The consultant should provide information with respect to the suitability of using CSA standards as opposed to completing the Phase I ESA and overall site requirements in consideration of O.Reg. 153/04 – Records of Site Condition.	Premier was retained by Polocorp Inc. to complete a Phase 1 ESA at the subject property for due diligence purposes. The industry standard for completing Phase 1 ESAs for due diligence purposes is (CAN/CSA) Standard Z768-01 (R2022). If future plans for the property include development to a more sensitive land use, an O.Reg. 153/04 Phase One ESA at minimum would be required to support filing for a Record of Site Condition (RSC).	The Consultant should establish if the use of the existing building(s) is Commercial to should be established. Currently, the report notes that Storage Building A is a Commercial usage (Table 1), and the proposed land use is residential. This leads to a more sensitive land use and an RSC is required by a Qualified Person. This comment is carried forward for tracking purposes.	Enviornemntal Consultant	See revised section 2.0 of the updated Phase I ESA report, dated May 22, 2026.	Complete
	Based on information provided in Section 6.2 of the report, it appears as though portions of the property are being used in part for commercial uses by tenants (Mega Cone Creamery and TAS Trucking). The report would benefit from additional information on the building / tenant arrangement, and a determination of the property use as defined in O.Reg. 153/04.	In 2020, Mega Cone Creamery entered into a 5-years lease agreement with the previous property owner to store two ice cream trucks and ice cream in freezers in Site Building A. Mega Cone Creamery and the current owner have agreed to extend the lease on a month-to-month basis while Mega Cone Creamery looks for alternate space.	The additional information regarding the building / tenant arrangement is appreciated, and helps to understand the history of site use by the tenants. This information should be incorporated in an updated Phase I ESA report. It is our interpretation of the letter dated November 20, 2025 by Premier Environmental Services, that the developers Qualified Person agrees with the land-use description for the subject property as provided in the Letter of Opinion prepared by Up Consulting (November 18, 2025), has confirmed that the land use is agricultural, and that a Record of Site Condition is not required. Based on the information provided in the letter (and supporting documents), the land use in the Phase I ESA should be updated by the Qualified Person where appropriate, with specific consideration to the Executive Summary, Table 1 – Summary of Site Buildings, Section 5.0, and Section 6.2 where commercial use is identified. If our interpretation of the November 20, 2025 letter is not accurate, the developer and their Qualified Person should advise the Municipality of any discrepancies. This comment is carried forward for tracking purposes.	Enviornemntal Consultant	See revised Executive Summary, Table 1 – Summary of Site Buildings, Section 5.0, and Section 6.2 of the updated Phase I ESA report, dated May 22, 2026.	Complete
	Should the property be determined to be of commercial usage, the consultant should provide information with respect to the requirements of O.Reg. 153/04, and the transition of property usage to a more sensitive land use such as residential in this case. A statement on whether or not reporting / filing to satisfy a Record of Site Condition is required for the proposed development should be included.	If the subject property is determined to be of commercial use, and the intended future property use is residential, the requirement to file an RSC would be triggered in accordance with O.Reg. 153/04. Based on the attached Opinion Letter prepared by Up Consulting dated November 13, 2025, the property is considered agricultural use. Residential development would not trigger the requirement to file an RSC.	The Consultant should establish if the use of the existing building(s) is Commercial to should be established. Currently, the report notes that Storage Building A is a Commercial usage (Table 1), and the proposed land use is residential. This leads to a more sensitive land use and an RSC is required by a Qualified Person. This comment is carried forward for tracking purposes.	Enviornemntal Consultant	See revised Executive Summary, Table 1 – Summary of Site Buildings, Section 5.0, and Section 6.2 of the updated Phase I ESA report, dated May 22, 2026.	Complete
	If it is determined that the requirements of O.Reg. 153/04 apply to this project, the consultant / design team should provide a plan to the Municipality with respect to how the requirements will be achieved. As a result of this further review, the consultant should also update with any recommendations for Phase II intrusive investigations if these are deemed necessary based on alternative regulatory requirements (i.e. O.Reg. 153/04).	N/A	Noted. See response above. This comment is carried forward for tracking purposes.	Enviornemntal Consultant	See revised Executive Summary, Table 1 – Summary of Site Buildings, Section 5.0, and Section 6.2 of the updated Phase I ESA report, dated May 22, 2026.	Complete
Section 4.2						
11	Section 4.2 of the Phase I ESA notes that at the time of report submission the city directories search had not yet been received. It is noted that if the results of this search alter the conclusions of the report that the Client would be notified in writing. At the time of review, it was unclear if the search results were received by the Consultant or not. If received, a brief summary / statement of the search results should be provided to confirm that they do not alter the conclusions of the report or the report should be updated as appropriate.	The city directory search results were received on December 6, 2023. The only results received were for the Calvary United Church located at 48 Hawkesville Road for the years, 2012, 2017 and 2021. These results do not alter the conclusions of the Phase I ESA.	Noted. No further comment.	Enviornemntal Consultant	Noted.	Complete
Section 4.3						

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12	Section 4.3 of the Phase I ESA provides a summary of the historical aerial photographs collected as part of the records review. The summary notes predominantly agricultural use within the study area; however, does not recognize the presence of a railway line along the western edge of the subject property. While it is understood that the Phase I ESA has been prepared to meet the requirements of CSA Standard Z768-01 (R2022) and not to meet <i>O.Reg. 153/04 – Records of Site Condition</i> , railway yards, tracks, and spurs are considered a potentially contaminating activity within <i>O.Reg. 153/04</i> . As such, a discussion of the presence of this railway line should be incorporated in the report along with an evaluation as whether or not the feature represents an area of potential environmental concern.	If an O.Reg. 153/04 compliant Phase One ESA was the mandate, the railway line along the west property boundary would be identified as an off-site potentially contaminating activity (PCA). Based on the PCA being located in a down - to cross – gradient direction of the subject property with respect to groundwater flow direction, the railway line PCA may not result in an area of potential environmental concern (APEC) at the subject property.	The report should be revised to include the discussion of the presence of this railway line along with an evaluation as whether or not the feature represents an area of potential environmental concern. In addition, the proposed grading may impact the groundwater flow direction. This should also be assessed.	Enviornemntal Consultant	See section 4.3 of the updated Phase I ESA report, dated May 22, 2026.	Complete
Section 4.5.3						
13	Section 4.5.3 of the Phase I ESA notes that at the time of report submission a response from Grand River Conservation Authority had not yet been received. It is noted that the Consultant has indicated that if the results of this response alter the conclusions of the report that the Client would be notified in writing; however, it is unclear if a response was received by the Consultant or not. A brief summary / statement of the response should be provided regarding the status of this correspondence, and any implications with respect to the report conclusions provided.	The GRCA response was received on February 9, 2024. The response did not include information that was not already discussed in the Phase I ESA narrative. The GRCA response does not alter the conclusions of the Phase I ESA.	The review by the GRCA may alter the results of the ESA if additional information is required as a result of their (GRCA) findings. This comment is carried forward for tracking purposes and depends on GRCA completing their site assessment.	Enviornemntal Consultant	See section 4.5.3 of the updated Phase I ESA report, dated May 22, 2026.	Complete
Section 6.1						
14	Section 6.1 of the Phase I ESA indicates that an interview was completed with the Site representative on November 20, 2023; however, the report does not include a summary of this interview. It is anticipated that the results of the interview have been incorporated in the report; however, a section summarizing the results of the interview should be included in the report for documentation purposes and to ensure consistency with Appendix C of CSA Standard Z768-01 (R2022).	The results of the interview were incorporated into the report. The interview was conducted with Mike Puopolo, the property owner.	The record of the interview should be included in the report. The record should provide the name of the interviewee, and the time that the property owner owned that property to provide context for the interview replies (e.g., an owner who has owned the property for years generally has more reliable information/history of the site than an owner hwo has owned the property for months. This is an extreme comparison).	Enviornemntal Consultant	See section 6.1 of the updated Phase I ESA report, dated May 22, 2026.	Complete
Section 6.2						
15	Section 6.2 of the Phase I ESA indicates that Building A is currently used for commercial purposes. Per CSA Standard Z768-01 (R2022), for commercial properties, company records shall be examined. The Standard notes the following as useful documents; site plans, building plans, permit records; production and maintenance records; asbestos surveys; site utility drawings; emergency response or contingency plans; spill reporting plans and records; inventories of chemicals and their usage; material safety data sheets; environmental monitoring data; waste management records; inventory of underground and above ground storage tanks; environmental audit reports; and, prior relevant reports and studies. Based on a review of the Phase I ESA it appears that the Consultant gained some related information from the site representative; however, it is not clear if any site records from the commercial entities were reviewed. The Consultant should clarify if any such records were made available and / or reviewed.	There are no company records for the tenants as they use the space for storage only. There is no advertising, exchange of commercial goods, public access, city directories, or ERIS database results for these tenants.	Noted; however, the Consultant should clarify the use of the space. The Consultant's response indicates that the space was used for storage only; however, it is noted in multiple locations (original Phase I ESA and Consultant's response to comments) that the space was also used for light vehicle maintenance. This comment is not fully addressed.	Enviornemntal Consultant	See section 6.2 of the updated Phase I ESA report, dated May 22, 2026.	Complete
	Section 6.2 would also benefit from an expanded description of light vehicle maintenance for clarity with respect to the determination of no areas of potential environmental concern.	The light vehicle maintenance completed by the tenants in Site Building A consisted of routine maintenance. There were no records of waste generation, fuel storage, chemical storage, or spills.	The Consultant's response is somewhat contradictory to information provided within Photos 16, 17, and 18 of the Phase I ESA which highlight the storage of chemicals by Mega Cone Creamery, and the presence of drums and pails containing oil and hydraulic fluid within the TAS Trucking unit. The Consultant should clarify this discrepancy, and update the Phase I ESA as necessary.	Enviornemntal Consultant	See section 6.2 of the updated Phase I ESA report, dated May 22, 2026.	Complete
Section 6.2						
16	Per Table 1 of <i>O.Reg. 153/04</i> , the report is to include details of cooling systems at the subject property. The report currently does not provide any information related to cooling systems on the subject property, and should be updated to include this information.	There are no air conditioners present at the subject property. Based on age, the refrigerators used by Mega Cone Creamery are not expected to contain ozone depleting substances (ODS), although this has not been confirmed. If the refrigerators are serviced, or removed during maintenance, it is recommended the units be inspected by qualified personnel and the presence or absence of ODS confirmed.	Noted. No further comment.	Enviornemntal Consultant	Noted.	Complete
Waterloo Catholic District School Board						
17		The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comments/conditions:		Planner	Noted	Complete
18		That any Education Development Charges shall be collected prior to the issuance of a building permit(s).		Planner	Noted	Complete
19		That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/).		Planner	Will be addressed prior to seving.	Tracking
20		That the developer shall include the following wording in the subdivision agreement to advise all purchasers of residential units and/or renters of same:		Planner	Noted	Complete

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21			<i>"In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."</i>	Planner	Noted	Complete
22			Further to the conditions, the board encourages that sidewalk to be installed on both sides of all proposed public roads and a minimum sidewalk 1-side of all internal/private roads on multiple residential blocks. Additionally, any dead ended road to be terminated with a turning circle sufficient to accommodate school bus turning movements.	Planner	Noted. Sidewalks provided as directed.	Complete
Enova Power (Comments for Plan of Subdivision Only)						
23			Conditions of Services: Enova standard conditions in effect at the time of servicing will apply.		Acknowledged.	Complete
24			Existing System: Enova has existing three phase primary overhead distribution lines running along Hawkesville Road that Enova intends to maintain. To accommodate the proposed new subdivision, Enova will use the existing overhead distribution lines as well as the underground distribution and will service the new subdivision underground.		Acknowledged.	Complete
25			Relocation of Existing Facilities: Any relocation of existing Enova facilities, if possible, will be at 100% of the applicant's cost		Acknowledged.	Complete
26			Expansion and Upgrade: If modifications or additions to Enova existing distribution system triggered by a subdivision development are necessary otherwise customer connections cannot be made, Enova will conduct an economic evaluation outlined in OEB Distribution System Code. Such an expansion cost will be stated in Subdivision Agreement between Enova and the Customer and shall be signed by other parties prior to construction.		Acknowledged.	Complete
27			Set Back: The proposed building(s) must be set back a minimum of 5.0m from all overhead primary conductors. Decreased setbacks (if proposed) may necessitate the installation of non-combustible barrier walls between Enova padmount transformers and the housing unit as per the Ontario Electrical Safety Code, Section 26-014. This installation would be at 100% the developer's cost and may require a revised right of way cross section to facilitate the installation due to the proximity of the padmount transformer to the sidewalk.		Acknowledged.	Complete
28			Clearance: Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment) shall not be brought closer than 3 meters to an energized overhead conductor owned by Enova.		Acknowledged.	Complete
29			Access to Meters: Enova requires a minimum 1.2 m (4') wide clear access in front of and around a meter location that is within 3 m (10') of the front corner of the building and is on the side of the lot where the service stub is located. If less than 1.2m (4') is provided, a registered easement on the adjacent lot must be granted at no cost to Enova. If this access/easement cannot be provided, the meter must be placed on the front face of the house. For on-street townhouse blocks, ganged meter bases must be placed on the end units in accordance with Enova's final design.		Acknowledged.	Complete
30			Easement: In a townhouse blocks subdivision if there is no public right-of-way, a blanket easement over all townhouse blocks is required by Enova in order to construct and maintain hydro owned facilities. Whereas there is public right-of-way in a townhouse block subdivision, individual easement to ganged meter base is required. Easement shall be at no cost to Enova and be free of encumbrances, including fences and shall be granted to Enova prior to connection.		Acknowledged.	Complete
31			Road Widening: The Township of Woolwich should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate the relocation of Enova's poles.		Acknowledged.	Complete
32			Grading: Any grading changes by the developer which will affect existing Enova facilities shall be reviewed and approved by Enova prior to starting any site grading.		Acknowledged.	Complete
33			Landscaping: The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the ESA <i>Planting Under or Around Powerlines & Electrical Equipment</i> guideline. After reviewing the landscaping plan, it is likely that the locations of some trees will have to be changed to give us room for our infrastructure.		Landscape Plan to be provided in a subsequent submission and therefore, is not included in this submission.	Tracking
34			What Happens Next: Enova may conduct a high level hydro plan once receiving the 1st submission package. Enova will only start the detail engineering design upon the reception of the 2nd submission package. Developers should be in contact with Enova well in advance to provide required documents and sufficient time for a design. Typical 14 weeks is required from the date of Enova receiving the 2nd submission package to the date of Enova issuing the subdivision agreement to Customer. Customer shall install road crossings as per Enova design and then install road base and curbs prior to start of hydro civil construction.		Acknowledged.	Complete
Metrolinx						
35			Please be advised that the subject lands (51 & 55 Hawkesville Rd) fall outside of the designated Metrolinx review zones. Metrolinx therefore has no comments and / or concerns on this 2 nd submission DPS/OPA/ZBA. For future reference, please consult the webpage and mapping portal provided below, in order to determine when Metrolinx should be circulated.		Noted	Complete
36			Metrolinx may also be removed from future circulations of this site.		Noted	Complete
Six Nations of the Grand River						
Haldimand Tract and 1701 Nanfan Treaty Preamble						
37			Six Nations of the Grand River (SNGR) Territory is within the most highly urbanized land in Canada. Development has occurred on Six Nations' traditional territory without consultation or consent of SNGR. The cumulative effects of this intense development has contributed to significant environmental degradation and, as a result, Six Nations has experienced severe impacts on its ability to exercise Aboriginal and Treaty Rights that are not only set out in the treaties themselves but are also recognized and affirmed in Section 35 of the Constitution Act, 1982. These treaty lands are subject to unresolved litigation and any infringement upon our treaty rights must be fully mitigated by the proponent. The 1701 Nanfan Treaty guarantees SNGR's right to harvest and hunt on this property for perpetuity, but this proposal undermines those rights. SNGR must be accommodated to mitigate any harm to its treaty rights caused by the proponent.		Acknowledged, see below	Complete
Treaty Rights Accommodation and Compensation						
38			Further development of the land infringes on Six Nations Aboriginal and Treaty Rights by essentially guaranteeing land will not be returned to a natural state and by negatively impacting the environment through emissions and use of resources. Developments on this land fall under the Duty to Consult and Accommodate, meaning Six Nations of the Grand River must be consulted with and accommodated for impacts to their rights.		Acknowledged, see below	Complete

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39			SNGREC requires that this development is paired with compensation for impacts to these rights and to the environment. Compensation should include environmental enhancement and other forms of compensation such as increased numbers of affordable units and discounts for Six Nations people. Please contact lrlust@sixnations.ca to schedule a meeting to collaborate on determining compensation. SNGREC requires commitment to compensation before Detail Design.		The proponent acknowledges the concerns raised by Six Nations of the Grand River (SNGR) regarding cumulative effects and the potential for impacts to Aboriginal and Treaty Rights. The intent of the Environmental Impact Study (EIS) and associated design is to avoid or minimize impacts to natural heritage features and to provide opportunities for ecological enhancement. As outlined in Section 8 of the EIS, the proposed development is limited to the tablelands, with the valleylands, floodplain, and associated buffers retained and enhanced. The proposed approach includes restoration and long-term management of lands currently under active agricultural use, resulting in an overall improvement in ecological function and condition. The proponent is committed to continuing consultation with SNGR and to incorporating feedback, where appropriate, as the project advances into Site Plan Approval and detailed design.	Complete
Wetland Removal and Replacement						
40			SNGREC prefers avoidance as the first priority regarding natural features. Even if this was a manmade feature, as noted in the EIS it provides ecological functions which cannot be ignored.		The preference for avoidance is acknowledged. The proposed development has been designed to avoid direct impacts to the primary natural heritage features, including the Conestogo River valley, floodplain, and treed slope, consistent with the findings of the EIS. Where modifications are proposed (e.g., drainage feature/wetland), these have been evaluated through the EIS process and are accompanied by mitigation and compensation measures intended to maintain or improve ecological function (see Sections 8.3 and 8.4 of the EIS, dated May 15, 2026.).	Complete
41			If the proponent is to replace the wetland, then SNGREC requires that the proponent replace the wetland at a 3:1 areal ratio (or 4:1 ratio if offsite). This helps account for the loss of wetland development time (which affects sediment, benthic invertebrates, species establishment and more). Replication of habitats, especially wetlands, generally has a low rate of success. It is critical that the proponent accurately designs the wetlands for water temperature, sedimentation, sediment type, and more.		The request for a 3:1 wetland compensation ratio is acknowledged. Based on the EIS, the existing wetland area is approximately 0.20 ha, and a 3:1 replacement would result in a target of approximately 0.60 ha of wetland habitat. This scale of compensation is considered feasible within the Hazard Land / Open Space Block (approximately 2.37 ha), representing roughly 25% of the block area, and will be further refined through detailed design in consultation with the GRCA and other agencies. Wetland design will consider appropriate hydrology, substrate, and ecological function, consistent with the recommendations of Section 8.4.6 of the EIS., dated May 15, 2026.	Complete
42			SNGREC requires that this wetland is finished and established prior to removal of existing wetland features so that wildlife relocation and habitat adaptation can occur prior to removal. Additionally, habitat exclusion fencing should be used to direct species away from the new SWM pond and removal/development and towards the new pond after it is established, and away from any development activities prior to removal.		This approach is supported. As recommended in Section 8.4.6 of the EIS, dated May 15, 2026, the replacement wetland feature (SWM facility) will be constructed and stabilized prior to the removal of the existing feature, allowing for wildlife relocation and establishment of ecological function prior to decommissioning.	Complete
43			Additionally, SNGREC requires that wetland compensation is paired with contingency funding and monitoring to ensure success of the wetland.		The need for monitoring and adaptive management is acknowledged. A monitoring and maintenance program will be developed as part of detailed design to ensure successful establishment of the wetland feature, with contingency measures implemented as required.	Complete
Open Space						
44			What is the plan for the open space that is currently the southern field? SNGREC recommends restoring this area with native species plantings.		This aligns with the recommendations of the EIS. All restoration and landscaping within the natural heritage system will prioritize native species and avoid invasive species, consistent with Section 8.2.3 and 8.3 of the EIS, dated May 15, 2026.	Complete
Land Use						
45			SNGREC encourages increasing the amount of medium density to make better use of the land.		Noted. Comments will be considered. Please note that a reduced density from the original proposal is supported by nearby residents, staff, and some councillors. The applicant has reflected a reduced density from that originally proposed.	Complete
46			SNGREC also encourages the inclusion of mixed use as having more local stores implemented within communities reduces car dependency and travel time.		Noted. Comments will be considered. Please note that downtown St. Jacobs is within 800m of this site	Complete

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47			The varied rear yard in the low residential area suggests that some properties could be constructed with smaller yards to increase the VPZ to the forest. SNGREC requests that the proponent reduces yard size to that of the smallest planned and increases the VPZ where possible.		Noted. Comments will be considered.	Complete
Landscaping						
48			SNGREC requires that native plant species are prioritized in landscaping efforts, and that invasive or potentially invasive species are completely avoided. Non-native species are less ecologically beneficial, and some non-native species can become invasive even after decades of seeming fine. SNGREC requires an opportunity to review any landscape plant lists before procurement begins. SNGREC requests that the proponent uses Kayanase Plant Nursery for procurement of plants if Kayanase's capacity allows.		The request for review of planting plans and use of Kayanase Plant Nursery is acknowledged. The proponent is open to collaboration with SNGR regarding plant selection and sourcing, including consideration of Kayanase Plant Nursery, subject to availability, suitability, and coordination with project specifications. Detailed planting plans will be developed during the landscape design phase.	Complete
49			SNGREC requires that the proponent commits to these actions during this phase of the application.		The proponent acknowledges the request for commitments. At this stage, the project has established the framework for natural heritage protection and enhancement through the EIS. Further detail and refinement of specific measures will occur during Site Plan Approval and detailed design, where there is greater resolution to address implementation. The proponent is committed to continuing engagement with SNGR through these phases.	Complete
50			SNGREC strongly encourages the creation of pollinator gardens using native plant species in landscaped areas not intended for human movement. Pollinator gardens can offer food, breeding space, and sanctuary for pollinators that are harmed by human expansion as they lose functional habitat, and their remaining habitat becomes more fragmented. Community gardens could also be implemented alongside pollinator gardens for an added community benefit. Pollinator gardens will also increase the visual attractiveness of the area.		The creation of pollinator-supportive plantings is supported. The landscape design will consider opportunities to incorporate pollinator habitat within appropriate areas of the site, consistent with the broader naturalization strategy outlined in the EIS.	Complete
Bird and Light Friendly Design						
51			SNGREC requests that the buildings and streetscapes are designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, and using warmer lights that are directed downwards and away from natural areas.	Enviornmental Consultant	See below.	Complete
52			Please see the City of Toronto's bird friendly practices for glass and for lighting as guidelines and implement them thoroughly across the entire design: https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf https://www.toronto.ca/wp-content/uploads/2018/03/8ff6-city-planning-bird-effective-lighting.pdf	Enviornmental Consultant	See below.	Complete
53			SNGREC requests commitment at this stage of development to explore and implement thorough bird and light friendly practices during the appropriate phases.	Enviornmental Consultant	The request for bird- and light-friendly design is acknowledged. Polocorp's role in the development is limited to land development and servicing, and the individual residential lots will ultimately be constructed by third-party builders. As such, detailed building design elements (e.g., glazing treatments, façade design, and building-level lighting) are not within the direct control of the proponent. That said, opportunities to incorporate bird- and light-friendly design principles will be considered through mechanisms available at this stage, such as subdivision design guidelines, municipal standards, and Site Plan Approval for applicable blocks. Where feasible, relevant best practice guidance (e.g., City of Toronto bird-friendly design guidelines) can be referenced to inform future building and site design.	Complete
Tree Compensation						
54			SNGREC requests a 10:1 tree replacement ratio for all trees removed regardless of DBH and 1:1 for any dead trees/snags removed as these are an important habitat feature. A high tree replacement ratio helps to restore lost ecological function and considers time for regrowth and reduced survivability due to deer browsing and tree die-off. The goal of an increased tree replacement ratio is also to create habitat and strengthen ecological resilience.	Landscape Architect/Forester/Enviornmental Consultant	The request for a 10:1 tree replacement ratio is acknowledged. Based on the EIS, dated May 15, 2026, approximately 53 trees are proposed for removal, resulting in a target of approximately 106 replacement plantings per the standards of the Township. A planting plan will be developed bearing your request with 10:1 in mind on the non developable lands. The EIS currently proposes naturalization of the non developable lands, this will be through a mixture of plants, trees, wetlands, etc. Planting will include a mix of sizes (e.g., caliper trees, whips, plugs, and shrubs) appropriate to restoration objectives and long-term ecological function.	Complete
55			Further, the higher tree replacement ratio better compensates for the long lasting, permanent impact of the development that will no longer be able to be used by Indigenous people. The removal of or damage to the natural environment has an immense negative impact to Six Nations of the Grand River Aboriginal and Treaty Rights in this area. Planting additional trees and improving the environment helps make up for the negative impacts from development on these rights.	Landscape Architect/Forester/Enviornmental Consultant	see above	Complete

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56			Planted trees must be site-specific native species and should be planted as close to the site as possible without impacting existing features and ecosystems, as should any future landscaping species be native species.	Landscape Architect/Forester/Enviornmental Consultant	The use of native, site-appropriate species is supported and consistent with the EIS. Planting will be prioritized within the site, particularly within the floodplain and buffer areas. Should off-site compensation be required, opportunities will be explored in consultation with relevant agencies.	Complete
57			Please consider planting plugs or other earlier-growth trees to help increase the feasibility of planting additional trees. SNGREC requires planting best practices are used and suggests collaboration with Kayanase Plant Nursery for recommendations and guidance.	Landscape Architect/Forester/Enviornmental Consultant	Acknowledged, see responses above and below.	Complete
58			Please be advised, if tree offset is not feasible onsite, SNGREC expects offset plantings to take place as close as reasonably possible to the impacted site. SNGREC encourages collaboration with the Grand River Conservation Authority, Township of Woolwich, Region of Waterloo, or RARE to achieve these offset plantings. Lastly, the Six Nations of the Grand River Environmental Levy may be considered should closer sites be unavailable, allowing SNGREC to purchase land and plant trees on behalf of the proponent. SNGREC's Environmental Levy is a cash-in-lieu option that is more financially feasible than other cash-in-lieu options as SNGREC will plant trees that are not full caliber, resulting in about \$40 per tree planted.	Landscape Architect/Forester/Enviornmental Consultant	The proponent is open to collaboration with SNGR and other agencies regarding planting approaches and implementation. Consideration of alternative mechanisms such as environmental levy contributions may be explored where appropriate; however, any such measures would be subject to further discussion and agreement among parties.	Complete
59			SNGREC expects that the tree replacement is paired with a robust and complete monitoring and maintenance plan complete with contingency actions to ensure successful establishment of the trees for long term success.	Landscape Architect/Forester/Enviornmental Consultant	The need for monitoring and maintenance is acknowledged. A monitoring and maintenance plan will be developed as part of detailed design to ensure successful establishment of vegetation, including contingency measures as required.	Complete
Geotechnical Report						
60	The report is well written containing sufficient engineering detail for the purposes of the project.			Geotech Engineer	Noted.	Complete
Slope Stability Report						
61	The report is well written containing sufficient engineering detail for the purposes of the project.			Geotech Engineer	Noted.	Complete
Hydrogeological Study						
62			In Figure 10, Seasonal High Groundwater Level Elevations, the seasonal high ground water contours should be extrapolated across the entire Site (including outside of the monitoring well area) for use in detailed design. This comment is carried forward for tracking purposes.	Hydrogeologist	The Seasonal High Groundwater Level surface has previously been extrapolated and was provided in the civil site plan drawings. In the next submission, the SHGWL surface from the site plan drawings is provided in a figure in the hydrogeological report.	Tracking
63			The Report notes that seasonal high ground water levels will be confirmed by additional water level data collected on site throughout Winter and Spring 2026. If additional ground water data is collected that is above the current high ground water condition, the hydrogeological assessment should be updated or an addendum report / memo should be created for reference with detailed design to ensure high water table elevations are considered. The consultant should also note if this monitoring period is representative of normal, above-average, or below-average precipitation conditions as per Section 13.4 of the Development Manual. This comment is carried forward for tracking purposes.	Hydrogeologist	Acknowledged. The next submission includes the most recent monitoring data and updated discussion and/or recommendations as applicable.	Tracking
64			If the dewatering zone of influence is determined to be greater than 250m, the door-to-door survey should be extended to cover the entire area of potential impact. This comment is carried forward for tracking purposes.	Hydrogeologist	As noted in other comments, the zone of influence will be calculated based on the latest design details. If it is found to extend more than 250 m beyond the property boundaries, then the door-to-door well survey will also be expanded as applicable.	Tracking
65			The need for temporary or permanent ground water lowering should be confirmed once foundation / servicing design details are available. If a dewatering plan is required, zone of influence should be determined to estimate the impact on known or suspected private well users in the area. This is carried forward for tracking purposes.	Hydrogeologist	Acknowledged. The next submission will provide a more detailed dewatering assessment with zone of influence and dewatering rate estimates. Impacts to private wells will be assessed in the context of the results of that assessment and discussed in the report.	Tracking
66			A portion of the Site was identified as being located within a Significant Ground Water Recharge Area (SGRA). A water balance assessment should be completed in accordance with Thornthwaite and Mather (1957). As per Section 1.34 of the Development Manual, the Water Balance discussion should: - comment on the pre- and post-development runoff and infiltration at the Site - include any proposed stormwater low impact design (LID) measures - comment on the potential to impact any down gradient natural features that are retained through development. This comment is carried forward for tracking purposes.	Hydrogeologist	A water balance has been prepared as part of the Functional Servicing and Stormwater Management Report. In the next submission, the hydrogeological report provides commentary on the water balance and the potential effects of the proposed infiltration/LID features.	Tracking
67			If LID features are proposed for the Site, the consultant should confirm that a minimum vertical separation of 1 m is maintained between the base of the LID system and the seasonal high groundwater table as per the MECP LID Stormwater Management Guidance Manual. This comment is carried forward for tracking purposes.	Hydrogeologist	Infiltration galleries are proposed in areas where there is clearance of 1.0m or more from the seasonally high groundwater elevations. This is indicated in the revised Functional Servicing and Stormwater Management Report. Final elevations and dimensions will be provided in the final report at the detailed design stage.	Tracking

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68			In addition to the consultant's recommendation to resampling MW24-01 for petroleum hydrocarbons and BTEX compounds to confirm ground water quality at this location, that the resampling include testing for the full Region of Waterloo Sewer Use By-Law parameter list to confirm compliance. This comment is carried forward for tracking purposes.	Hydrogeologist	Additional sampling will be undertaken as part of the supplemental investigation of fill material in the southwestern portion of the site. Analysis of the additional groundwater samples will include the Region of Waterloo sewer use by-law suite, as requested.	Tracking
69			MW24-01 was advanced in an area underlain by up to 9.8 m of fill. The report should provide information regarding the origin or placement history of this material, and should include an assessment of whether it may be contributing to the observed ground water quality conditions in this area. This comment is carried forward for tracking purposes.	Hydrogeologist	The hydrogeological report is revised to include this information and relevant assessments.	Tracking
70			A formal dewatering assessment was not completed for the proposed development. The report should include: - confirmation on the need for dewatering during construction - if dewatering is required, the anticipated daily volume of water that will be pumped from the Site should be provided This dewatering assessment should - include a review of the proposed servicing plan - utilize the base elevation of the infrastructure - utilize the high ground water condition at the Site - estimate the maximum zone of influence and determine whether these drawdown conditions are expected to extend offsite - comment on whether construction dewatering has the potential to impact adjacent natural features or private well users - comment on whether this work requires an Environmental Activity Registry (EASR). This comment is carried forward for tracking purposes.	Hydrogeologist	As noted in the prior submission, a formal dewatering assessment was not possible because of the lack of design details at the time of writing. In the next submission, the hydrogeological report includes a detailed dewatering assessment reflecting the latest design information and monitoring data, including estimates of zone of influence, estimates of watertaking rate, identification of approvals requirements, and general impact assessment regarding applicable receptors (including well users and the natural environment). Detailed monitoring and mitigation plans will be deferred until site plan application.	Tracking
71			In Section 5.4, Basements of Residences, is the suggestion that given the presence of glacial till, foundation drains installed in accordance with the Ontario Building Code would be sufficient to address seepage and prevent moisture ingress where the required separation cannot be achieved. This approach is not according to the Township's Development Standards, and unacceptable. Other mitigation measures should be explored to achieve the minimum separation criteria and avoid reliance on long-term dewatering and to reduce the potential for basement flooding. This comment is carried forward for tracking purposes.	Hydrogeologist	As per a discussion with the Township of Woolwich Engineering staff on May 25, 2026, different options are being explored. At this time a groundwater drain is proposed to be installed 0.60-0.80m below the proposed underside of footings of the Lots/Blocks in the northeast area of the development. At the detailed design stage, this design will be finalized in consultation with Township staff.	Tracking
72			The report should comment on the source and history of the onsite fill. Any fill material removed or re-used on-site from this area should be quantified and assessed to determine whether it has the potential to impact ground water quality. The additional investigation recommended in the report should be conducted to confirm characteristics related to this sand and gravel fill. This comment is carried forward for tracking purposes.	Hydrogeologist	The source of the fill is uncertain but from aerial photos placement of the fill appears to have occurred over a period of about 10 years from 2006 to 2015. As mentioned in the report, we intend to undertake additional investigation to assess the fill in greater detail upon the pre grading stage, we indentify to general scope of the unsuitable fill, but only will be able to fully assess this fill with grading operations. The results of that investigation is included in the next submission of the hydrogeological report and applicable impacts on dewatering approaches or requirements will be discussed."	Tracking
73			The report recommends that should the zone of influence be identified to extend off site to properties that are known or suspected to have a private water well, then a well monitoring should be implemented at those wells, pending well owner agreement. Also recommended is that if overburden wells are identified as part of the well survey, a well monitoring program should be implemented and should include the collection of baseline water quality samples. This comment is carried forward for tracking purposes.	Hydrogeologist	Acknowledged. We consider that the specifics of a well monitoring program are better left to the site plan application stage. Nonetheless, in the next submission, the hydrogeological report includes an assessment of zone of influence and of off-site private wells and will identify whether a private well monitoring program is expected to be required.	Tracking
Functional Servicing and Stormwater Management Report						
Water Servicing						
74			In Section 3.1, Site Grading, the report references Preliminary Grading Plans, Drawings No. 6, 7, 11 and 12. They should be included for review.	Civil Engineer	The previous Preliminary Grading Plans, including Drawings 6, 7, 11, and 12, were provided with the previous submission to the Township. The revised Grading Plans are being provided again as part of this submission.	Complete
75			A copy of the (updated) December 2025 Groundwater Monitoring data should be included for review.	Civil Engineer	The Hydrogeological Study by GEI Consultants Canada Ltd. was provided with the March 2026 submission documents. An updated Hydrogeological Study will be provided with this submission.	Complete
76			Section 3.2, Roads, references Drawing No. 15 with respect to the proposed typical road cross section. This drawing should be included for review.	Civil Engineer	The Notes and Details Plan (Drawing No. 15) was previously provided as part of the submission to the Township. A revised Notes and Details Plan is included with this submission.	Complete
77			Section 4.1, Water Supply, and Appendix F, should include the Maximum Hour Demand Flow and Peak Hour Demand Flow calculations based on the Engineering Design Standards.	Civil Engineer	The Maximum Hour Demand Flow and Peak Hour Demand Flow calculations have been revised and are provided in Section 4.1 of this submission.	Complete
78			The Design Flow Demand in Section 4.1, Water Supply, and in Appendix F, should be based on the larger of Maximum Day Demand + Fire Flow, or Peak Hour Demand. The Demand Flow provided indicates that it is only based on the Fire Flow Demand, and does not discuss the Maximum Day Demand or the Peak Hour Demand. The Design Water Demand Flow should be reviewed.	Civil Engineer	Section 4.1 has been updated, and the Maximum Day Demand plus Fire Flow calculations will be included with this submission in accordance with the Engineering Design Standards.	Complete

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79			The fire hydrant flow test was performed at the most westerly hydrant on Hawksville Road, fronting 47 Hawksville Road. Not accounted for is the headloss in the watermain when it is extended into the Subdivision. A concern is that the available water supply at the minimum 140 kPa (20 psi) will be less than the design water demand. The available water supply should be reviewed taking into account the estimated head loss with the extension of the watermain distribution network into the subdivision.	Civil Engineer	A water modelling exercise has been completed to estimate the available water supply for the subdivision. Additional information regarding boundary conditions has been requested from the Region of Waterloo and will be provided in an updated report once received.	Tracking
Sanitary Servicing						
80			The review focused on the "Chris Court Option" for servicing (i.e., formerly Option 3), which provides gravity sewers from Hawksville Road through the development to the cul-de-sac bulb, and through a block to the existing sanitary sewer collection system on Chris Court.	Civil Engineer	Acknowledged.	Complete
81			On the Preliminary Sanitary Sewer Design Sheet for the Chris Court Option, the calculation for Infiltration flow should be reviewed. For example, for Catchment Area 10, Area = 0.36 ha, the design Infiltration flow is 0.36 ha x 0.25 L/s/ha / 1000 L/m3 = 0.00009 m3/s, but the spreadsheet show it as 0.00034 m3/s. This can be addressed during the Detail Design Stage.	Civil Engineer	The error in the design sheet calculations has been corrected, and the updated information is reflected in the Preliminary Sanitary Sewer Design Sheets included in the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Ltd., dated June 5, 2026. This report is included with this submission.	Complete
82			On the Preliminary Sanitary Sewer Design Sheet, for the sewer segment from MH I to MH J, an area of 0.04 ha is provided. This area should be outlined on the Sanitary Sewer Catchment Area drawing. This can be addressed during the Detail Design Stage.	Civil Engineer	As requested, the Sanitary Drainage Area Plan and design sheet has been updated and included with this submission.	Complete
83			On the Preliminary Sanitary Sewer Design Sheet, for the sewer segment from MH I to MH J, the pipe length is shown as 10.90 m, but Figure No. 5A shows it as 11.3 m. This discrepancy should be resolved. This can be addressed during the Detail Design Stage.	Civil Engineer	As requested, the Sanitary Drainage Area Plan and design sheet has been updated and included with this submission.	Complete
Storm Servicing						
84			The runoff coefficients provided in the Preliminary Storm Design Sheet should follow the Township Engineering Standards. For example, for Townhouses, the design runoff coefficient is 0.85, but a value of 0.60 is in the Design Sheet. Alternatively, calculations showing how the value for each sub-area type is derived should be provided.	Civil Engineer	Sub-area type calculations have been provided for the condominium block, townhouse block, and single-detached housing areas in the appendix of the revised Functional Servicing and Stormwater Management Design Report and is included with this submission.	Complete
85			The Preliminary Storm Design Sheet shows a DCBMH1A structure catching runoff from Area 1000, but the Preliminary Storm Sewer Catchment Figure, Fig. No. 6A does not show this structure. This discrepancy should be resolved. This can be addressed during the Detail Design Stage.	Civil Engineer	As requested, the storm drainage area plan and design sheet is updated, coordinated and included in this submission.	Complete
86			In the Preliminary Storm Design Sheet, for the storm pipe segment from MH 13A to MH 14A, the runoff from Area 5000 is captured by the structure MH 13A, (labelled as DCBMH 13A on Fig. No. 6A). The discrepancies between the Preliminary Storm Design Sheet and Fig. No. 6A in structure labels and where runoff from Area 5000 is captured should be resolved. The third discrepancy is the storm pipe size shown in the Design Sheet versus the pipe size shown on Fig. No. 6A. This can be addressed during the Detail Design Stage.	Civil Engineer	As requested, the storm drainage area plan and design sheet is updated, coordinated and included in this submission.	Complete
87			The length of storm pipe from MH 20A to MH 17 A is a discrepancy between the Storm Design Sheet and Fig. No. 6A. This discrepancy should be resolved. This can be addressed during the Detail Design Stage.	Civil Engineer	As requested, the storm drainage area plan and design sheet is updated, coordinated and included in this submission.	Complete
88			As a minimum, the last storm sewer run on Area 7000, directing runoff into structure EF010 should be included on Fig. No. 6A. This is the minimum if the storm sewer on Area 7000 is intended to be privately owned and maintained.	Civil Engineer	As requested, the storm drainage area plan and design sheet is updated, coordinated and included in this submission.	Complete
89			The Preliminary Grading drawing discussed in Section 3.1, Site Grading, were not included in the submission. These drawings may show where a low point in the roadway is designed and possibly requiring storm sewer to convey the major storm (i.e., 100-year) runoff. This can be addressed during the Detail Design Stage.	Civil Engineer	The previous Preliminary Grading Plans (Drawings 6, 7, 11 and 12) were previously provided with the submission to the Township. The revised Grading Plans is provided with the updated submission. The low point of the proposed network is at DCBMH.13A, adjacent to the proposed Stormwater Management Facility. Major storm events will be carried to the proposed Stormwater Management Facility via the road network and enter overland at this location.	Complete
90			Although the storm sewer invert information is not provided, the SWM Pond design indicates the high water level in the SWM Pond Facility during a 5-year Event is 338.56 m. The storm sewer invert entering the SWM Pond Facility should be no lower than that elevation to avoid retained runoff from backing up into the storm sewer.	Civil Engineer	The proposed inlet invert elevation was provided on Drawing No. 2 and 3, at 338.60, 0.04m above the ponding elevation of the 5-year design storm event. The pond is updated on the revised civil drawing set, and the proposed inlet to the stormwater management facility is above the ponding elevation of the 5-year design storm event as indicated on Drawing No. 2 and 3.	Complete
91			The requirements for Water Balance and Erosion Control are discussed in Sections 5.7.2 and 6 of the FSR as identified in Appendix A of the Township's CLI-ECA for Stormwater Management Systems. The Sections should be extended to provide the target values described in the Township's CLI-ECA for Stormwater Management Systems.	Civil Engineer	The water balance requirements per the Township's CLI-ECA is included in Section 5 and 6 of the Functional Servicing and Stormwater Management Report by GEI Consultants Canada Ltd., June 5, 2026.	Complete
92			The tributary area to the wetland facility proposed for the Chris Court option is 4.52 ha, less than the minimum required based on the MOECC Guidelines. The site grading should be revised accordingly to increase the tributary area to the facility in accordance with the Guidelines.	Civil Engineer	The minimum criteria to sustain vegetation and volumetric turnover in the wetland facility is 5ha per the MOECC guidelines. The provided drainage area to the proposed wetland facility is close to this requirement, at 4.52ha. We request the Township consider this drainage area for the wetland as the grading in the development is limited due to naturally sloped areas and would require significant cut and fill to modify.	Tracking

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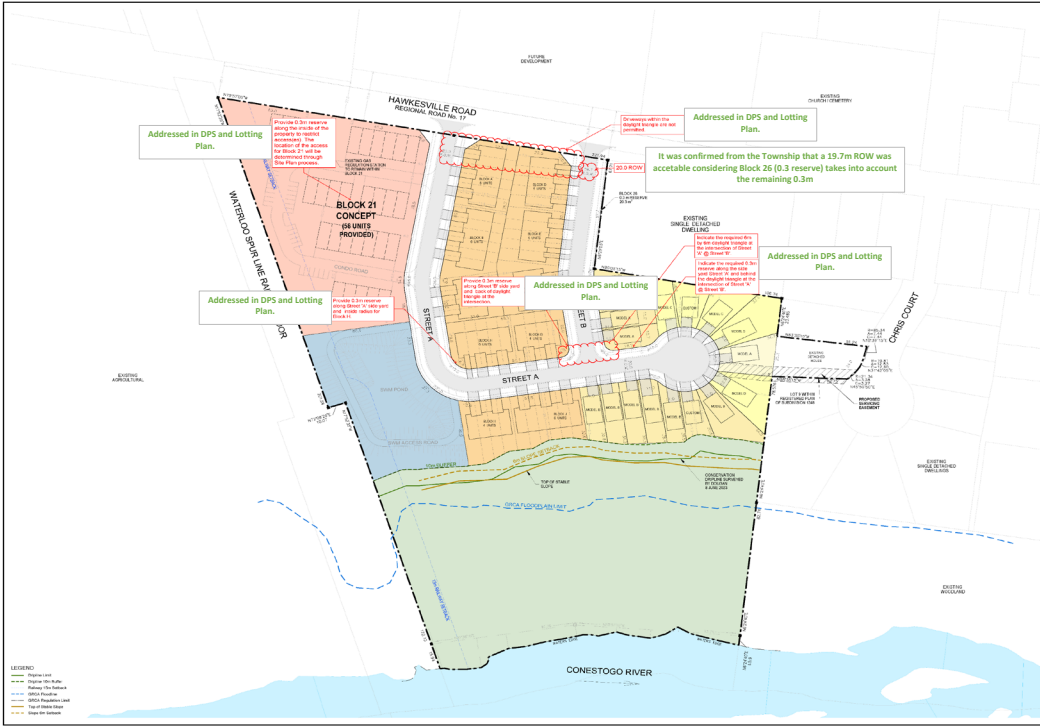
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93			Based on the tables provided in Appendix E, the forebay area is more than 23% of the total permanent pool area, which is greater than the maximum area required of 20% of the total permanent pool area per the MOECC Guidelines. The configuration of the facility should be revised to reduce the relative footprint of the forebay area relative to the total area of the permanent pool.	Civil Engineer	As requested, the confiugration of the forebay is updated so that it is less than 20% of the permanent pool area.	Complete
94			As shown on Drawing 8, The proposed side slopes for the forebay of the Chris Court option SWM facility are steeper than the 5:1 maximum listed in Section 9.8 Engineering Development and Infrastructure Manual. This should be revised.	Civil Engineer	As requested, the forebay side slopes is updated in Section 5:1.	Complete
95			As shown on Drawing 8, the 3:1 slope along the north side of the SWM facility, where it abuts private property exceeds the maximum steepness of 3.5:1 and average 4:1 requirements listed in Section. In addition, the maximum allowable slope of 5:1 for wetlands, as listed in Section 9.8, is exceeded around the east side of the facility. The side slopes should be revised to meet the Engineering Standards.	Civil Engineer	As discussed with the Township of Woolwich, 5:1 slopes have been provided to the limit of maximum extended detention (previously 339.00 and now 339.30). Beyond this 3:1 Slopes have been provided, as agreed upon by the Townsip, in order to reduce the footprint of the proposed Stormwater Management Facility, reduce retaining walls, and required fill.	Complete
96			A splitter manhole should be included as per the Engineering Standards to ensure that a maximum of the 2-year flow is conveyed to the forebay of the proposed wetland SWM facility for the Chris Court option.	Civil Engineer	A splitter manhole has been included in the design. Discussion of the splitter manhole design to route up to the 2-year design storm to the forebay is included in Section 5.7.1. of the Functional Servicing and Stormwater Management Report by GEI Consultants Canada Ltd., dated (June 03, 2026) of this submission.	Complete
97			A freeboard of 0.45m above the 100-year water level of 338.86 m is required around the entire wetland, as per the Engineering Standards.	Civil Engineer	As requested, the proposed stormwater management facility has been revised such that 0.45m of freeboard have been provided above the 100-year design storm water level.	Complete
98			The invert of the inlet to the facility must be 0.45m above the 5-year water level of 338.56m, or the "approved otherwise high water level"(Engineering Standards, Section 9.8).	Civil Engineer	As requested, the inlet invert has been revised such that it is 0.45m above the 5-year design storm event,	Complete
99			There are potential concerns with the outlet structure:	Civil Engineer	Noted	Complete
100			Standards do not permit orifice plates, only small diameter pipes. The design proposes two (2) orifices cut into the outlet structure, protected by trash racks, and an orifice plate on the downstream outlet pipe. If a 375mm dia. pipe is used instead of the proposed 320mm dia. orifice, the pipe size will be less than the minimum 450mm dia. pipe per the MOECC Guidelines. The outlet should conform to the Engineering Standards.	Civil Engineer	The outlet structure has been revised so that a reverse slope orifice tube is provided, with no outlet orifice and outlet pipes of at least 450mm.	Complete
101			The Engineering Standards require reverse slope pipes or perforated riser pipes unless the Consultant can demonstrate to the Twp and CA that an alternative outlet structure could be used.	Civil Engineer	A reverse slope pipe is provided at the outlet structure.	Complete
102			The Standards require an emergency overflow spillway and it is unclear if one is provided. The text of the FSR indicates that a weir is provided for the 50 and 100-year and Regional controlled outflows, but not uncontrolled inflows. This weir is shown on the preliminary grading plan, but not the SWM facility drawings. The SWM report appendices list this overflow weir, but do not provide sizing calculations for uncontrolled flow, nor is it at the right elevation to meet the Standards. The details of the emergency overflow spillway should be provided, including dimensions, design flow, and overflow capacity. In addition, the location of a spillway should be checked with appropriate calculations provided that it does not jeopardize the slope stability or erosion protection. Noted is that turfstone or cable mat is only allowed beneath the 5-year water level.	Civil Engineer	The proposed weir also functions as the emergency overflow spillway for the SWM facility. The spillway/weir has been added to the revised SWM facility drawings and corresponding grading plans for consistency. Revised stage-storage-discharge calculations, including emergency overflow sizing and overflow capacity calculations for uncontrolled inflow conditions, have been provided in the report appendices. The spillway elevation and configuration have been revised to conform with applicable design standards. In addition, the spillway location and associated erosion protection measures have been reviewed to confirm that slope stability is not adversely impacted. Details regarding permissible erosion protection treatments relative to design water levels have also been incorporated into the revised drawings.	Complete
103			Calculations are required in the FSR to demonstrate that the provided area for the sediment drying is sufficient to accommodate the expected sediment load at a maximum 1m storage depth with 4:1 maximum angle of repose in accordance with the Engineering Standards.	Civil Engineer	As requested, calculations for the required sediment drying area is provided in the revised Functional Servicing and Stormwater Management Design Report.	Complete
104			The Engineering Standards allow for a minimum inside horizontal curve radius of 10 m on the SWM Pond Maintenance Access roadway, and require a minimum 20 m flat loading area. The Preliminary Grading Drawings 1 and 2 should indicate these criteria	Civil Engineer	As requestsd, the grading plans is updated to reflect these criteria.	Complete
105			As per the Engineering Standards, a flat bottomed channel is required to convey overland flow into the facility, but not via the forebay. The drawings should include the overflow inlet that is designed using analytical techniques acceptable to the Township and as described in the Standards.	Civil Engineer	As requested, the overland flow route to the proposed stormwater management facility is indicated on the revised engineering drawings.	Complete
106			As per the Engineering Standards, a minimum of two (2) boreholes and monitoring wells shall be located near the centre of the main cell and forebay for the purpose of gathering the existing soils data and groundwater elevation and meeting the 1 m separation between the seasonally high groundwater elevation and bottom of the pond. The report should include recommendations on how these criteria in the Engineering Standards are met or exceeded.	Civil Engineer	As part of the revised hydrogeology submission, two additional boreholes is advanced within the proposed stormwater management facility.	Tracking
Noise and Vibration Feasibility Study						
107			Section 2 – The noise sources described do not mention the gas regulator station and pumping station shown on the site plan. Please add. Please include the existing regulator in the analysis and add a recommendation in Section 7 requiring a future noise study at the detail design stage for the pumping station.	Transportatio Engineer/Noise Consultant	The pumping station is no longer included in the latest plan dated March 20, 2026. The gas regulator station will be re-evaluated during the site visit to conduct additional vibration measurements for Block 21 prior to site plan approval.	Complete
108			Table 4 – The daytime road noise level at Location E is shown as 52 dBA. Please check.	Transportatio Engineer/Noise Consultant	Corrected in updated report dated May 15, 2026	Complete
109			Section 5.3, para 2 – The façade locations and townhouse types do not match Fig 4.	Transportatio Engineer/Noise Consultant	The recommendations apply to the north, west, and south façades and is corrected in the updated report dated May 15, 2026.	Complete

Polocorp Development
51, 55 and 57 Hawkesville Road
St. Jacobs, Township of Woolwich
2nd Submission Draft Plan and 4th Submission OPA and ZBA

Date: June 09, 2026

Comment #	1st Submission Comment	Developer Response	2nd Submission Comment	Responsibilities	Developer Response	Status
110			Section 5.4 – Location M1 is not shown in Fig 2. Please add.	Transportatio Engineer/Noise Consultant	Location M1 included in the updated report dated May 15, 2026, 2026.	Complete
111			Section 5.4 – The vibration test location is described as being 30m from the railway ROW while the closest building is at about 18m according to the site plan. Will the measured levels meet the criteria at that distance?	Transportatio Engineer/Noise Consultant	As noted in our updated report dated May 15, 2026, additional vibration measurements for Block 21 will be conducted prior to site plan approval.	Complete
112			Section 6 – Please remove the last sentence in Warning Clause A. It appears to be a typo.	Transportatio Engineer/Noise Consultant	Noted, removed in updated report dated May 15, 2026.	Complete
113			Section 7, Recommendation 2 – We agree with the statement that, <i>“When detailed floor plans and building elevations are available for the dwelling units, window glazing requirements should be refined based on actual window to floor area ratios”</i> .	Transportatio Engineer/Noise Consultant	Noted.	Complete
114			Section 7, Recommendation 3 – Reference is made to a warning clause regarding the <i>“proximity to industrial/commercial uses”</i> but no such warning clause is provided. Please delete this reference if stationary noise is confirmed to be insignificant, or add a clause if stationary noise is audible (but acceptable).	Transportatio Engineer/Noise Consultant	Wording removed in updated report dated May 15, 2026.	Complete
115			Appendix B – According to the train traffic descriptions in Section 2 and Table 3, CN freight traffic occurs only at night although noise levels are predicted for both day and night in Appendix B. In addition, the tourist train traffic is not accounted for in the noise predictions. Please clarify.	Transportatio Engineer/Noise Consultant	As described in Section 4.2 of our report, daytime trains are assumed to be tourist passenger trains, while nighttime trains are CN way freight trains.	Complete
116			Appendix B – Please confirm which sound level predictions include train whistling and which do not. Per NPC-300, whistling is included when determining building component requirements, but not for OLA sound levels and POW sound level predictions when determining ventilation requirements. Please clarify.	Transportatio Engineer/Noise Consultant	Train whistle noise was assessed at the façade but not in the OLAs. Note added to the updated May 15, 2026 report.	Complete
117			Please provide backup calculations for the recommended STC values.	Transportatio Engineer/Noise Consultant	Included in Appendix C updated report dated May 15, 2026	Complete



KEY MAP: N.T.S.

CONCEPTUAL LOTTING PLAN

PART OF LOT 37, GERMAN CONVEYANCE TRACT,
TOWNSHIP OF WOODBURN
REGIONAL MUNICIPALITY OF WATERLOO
ST. HAWKESVILLE ROAD, ST. JACQUES

SCALE: 1:1000 (NOT TO SCALE)

LOTTING SCHEDULE

TYPE	AREA (sq. ft.)	AREA (sq. m.)
Block 21 Concept (DPS)	48	4.48
Block 26 Concept (DPS)	11	1.03
Block 27 Concept (DPS)	5	0.46
Block 28 Concept (DPS)	2	0.19
TOTAL	66	6.16

SAMPLE (DETAILED) MODELS

APPROVALS

DATE	BY	REMARKS	REVISION

POLICORP 375 Queen Street South, Waterloo, ON, N2T 1Y6
DATE: 2020.01.12
PROJECT: 1919 (Hawkesville)
FILE: 1919-001-01-12.dwg
SCALE: 1:1000 (NOT TO SCALE)
DRAWN BY: SITE