From:	Mathew, Mohit
To:	Hern, Darryl
Cc:	Fadaee, Sara; Kamal, Ahmad
Subject:	39T-TC2501 Acorn Valley Resubmission - TIS Review
Date:	Friday, February 13, 2026 11:14:02 AM
Attachments:	image001.png image002.png image003.png image004.png

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Hi Darryl,

I have been assigned to review the **Acorn Valley TIS Resubmission** and am reaching out to provide my observations and feedback. My comments on the report are outlined below:

1. **Executive Summary and 1.1 Overview** – (Minor Typo): Following discussion of the draft plan changes, it is noted that the Executive Summary identifies 2020 as the base year. However, the Introduction (Page 1) states that 2019 is the adopted base year, and the subsequent analysis appears to be based on 2019 conditions. For consistency and clarity, please update the Executive Summary to reflect the correct base year used in the assessment.

2. **Executive Summary and 1.1 Overview** - The Executive Summary and Introduction state that three four-leg accesses are proposed on Christie Drive, one of which is aligned with Wheeler Avenue. This is consistent with the draft subdivision plan figure. However, the 'TIA Scope' section identifies the Christie Drive / Wheeler Avenue (future) intersection as one study intersection and refers to three additional future access intersections. Based on the description provided, there appear to be two new four-leg accesses on Christie Drive (Street B and Street D), with the third being the new southern leg at Christie Drive / Wheeler Avenue (Street A). Could you please clarify the origin of the fourth access referred to (i.e. the High-Density Block access), as this does not appear to be reflected in the draft subdivision plan?

3. **Section 2.2 Traffic Volumes** – (Minor Typo): Please revise the date to 27 August, 2019.

4. **Section 2.2 Traffic Volumes** - The adjustment factor calculation for the AM peak hour is presented as 452/360 = 1.255. When rounded to one decimal place prior to application, this would result in a seasonal factor of 1.3 rather than 1.2. While it is acknowledged that applying the higher factor may not result in any movements failing, the use of 1.2 understates traffic volumes within the study area and is not consistent with a conservative assessment approach. Please review and modify the seasonal factor adopted in the analysis, as required.

5. **Section 3.2 Trip Generation** – The report text references LUC 221 (Multifamily Housing Mid Rise). However, Table 3.1 applies LUC 220 (Multifamily Housing Low Rise). Please revise the write-up to ensure consistency with Table 3.1 and reflect LUC 220 throughout.

6. **All Turning Movement Count (TMC) figures** - Across all TMC figures, it is unclear where the referenced "High Density Block" driveway on Christie Drive originates from. The report repeatedly

states that there are only three access points to Christie Drive — the Christie Drive/Wheeler (Street A) intersection and the Street B and Street D roundabouts. Furthermore, the draft subdivision plan (Figure 3.2) does not identify any additional access along Christie Drive between Street D and Harris Road. Based on the plan, it appears that the High-Density Residential Block would access the network via Street D rather than via a separate dedicated driveway to Christie Drive. If a standalone “High Density Block” access is not proposed, the traffic movements currently shown at that location would need to be redistributed across the three identified accesses, which may affect the operational performance of each. Could this please be clarified?

7. **3.3 Trip Distribution and Assignment** – (Figure 3.2) There appears to be a discrepancy between the volumes shown in this figure and those presented in Table 3.1.
   For the AM peak hour, the total outbound volumes shown in the figure equate to 305 trips (84 from the High-Density Block, 29 + 69 from Street D, 85 + 28 from Street B, and 10 from Street A). This differs from the 332 outbound trips identified in Table 3.1.
   Similarly, the total inbound volumes shown in the figure equate to 106 trips (34 from the High-Density Block, 9 + 21 from Street D, 12 + 27 from Street B, and 3 from Street A), compared to 116 inbound trips identified in Table 3.1.
   Could you please clarify the reason for this discrepancy?

8. **3.3 Trip Distribution and Assignment** – Figure (3.3) Same as comment 7, but for the PM peak hour.
   During the PM peak hour, the total outbound volumes shown in the figure equate to 208 trips (60 from the High-Density Block, 20 + 46 from Street D, 19 + 56 from Street B, and 7 from Street A). This differs from the 227 outbound trips identified in Table 3.1.
   Similarly, the total inbound volumes shown in the figure equate to 331 trips (93 from the High-Density Block, 31 + 74 from Street D, 30 + 91 from Street B, and 12 from Street A), compared to 360 inbound trips identified in Table 3.1.
   Could you please clarify the reason for this discrepancy?

9. **Section 4.1.4 Traffic Operations** - This section notes that a default PHF of 0.92 has been applied for future scenarios, rather than the PHFs calculated from existing counts, on the basis that existing PHFs may not accurately reflect future traffic conditions. While this approach is reasonable for intersections subject to future changes—such as new accesses, the Christie / Wheeler, or the Christie / Harris intersections—where lane configurations and/or control types are being modified, it may not be appropriate for intersections where no changes are anticipated (e.g., Hamilton / Wheeler, Hamilton / Harris). At these unchanged intersections, driver behavior is unlikely to differ, and the originally computed PHFs would provide a more accurate representation of peak-hour demand.

Please feel free to reach out in case there are any questions or concerns.

Regards,

Mohit Mathew, P.Eng.
Transportation Engineer

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Stantec

With every community, we redefine what's possible.

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Waterloo ON N2L 0A4

February 13, 2026
Project/File: 161414695

Jarrod Craven
Director of Public Works
Municipality of Thames Centre
4305 Hamilton Road,
Dorchester ON N0L 1G3

Dear Jarrod Craven,

Reference: Scoped Environmental Impact Study – Application 9T-TC2501, Acorn Valley Subdivision Resubmission, Dorchester, ON

1 Introduction

Stantec Consulting Ltd. (Stantec) completed a peer review of the scoped Environmental Impact Study (EIS) entitled *Scoped Environmental Impact Study* (June 2025) prepared by Vroom + Associates for Doug Tarry Limited. The EIS was prepared in support of a Draft Plan of Subdivision for the proposed Acorn Valley Subdivision, located at 83 Christie Drive and a portion of 2648 Harris Road, in Dorchester, in the Municipality of Thames Centre, County of Middlesex.

The purpose of the peer review was to verify that the submitted EIS had been completed in accordance with the policies of Provincial Planning Statement (PPS; 2024), the Municipality of Thames Centre Official Plan (OP) (2004) and the Middlesex County Official Plan (2023).

Results of the peer review were summarized in Stantec's ***Natural Environment EIS Report Peer Review – Application 39T-TC2501, O3-25, Z20-25, Acorn Valley Subdivision, Dorchester, ON*** letter dated October 24, 2025. The review concluded that although Stantec generally agreed with the recommendations presented in the scoped EIS, additional details regarding the Christie Road extension, water balance, setbacks, fisheries and species at risk were requested to demonstrate no negative impacts.

Since then, the *Scoped Environmental Impact Study* has been updated (revised December 2025) and a comment response matrix developed.

2 Documents Reviewed

The following documents were provided to Stantec for review:

- Scoped Environmental Impact Study – Doug Tarry Limited, Acorn Valley Subdivision, Dorchester (Vroom + Associates, revised December 2025)
- *Comment Responses* (January 8, 2026)

Documents supporting the resubmitted scoped EIS were provided and referenced where required, including a brief consultation of:

- *Proposed Acorn Valley Development – 83, Christie Drive, Dorchester, Ontario Hydrological Study Report* (CJDL Consulting Engineers, December 19, 2025)
- *Acorn Valley Subdivision, Dorchester Municipality of Thames Centre, County of Middlesex Stormwater Management Report* (CLDL Consulting Engineers, January 8, 2026)
- *Acorn Valley Subdivision, Dorchester Municipality of Thames Centre, County of Middlesex, Functional Servicing Report* (FSR) (CLDL Consulting Engineers, June 25, 2025)

3 Comment Responses

Comment responses submitted as part of this second submission were considered during the review of the updated scoped EIS and are summarized in Attachment 1.

There are still outstanding items regarding the Official Plan (OP) (Section 3.2) test of no negative impact for the proposed development, particularly as it relates to Endangered and Threatened Species habitat and natural features and their associated ecological functions (Group A features), proposed strategies to address the extensive water balance changes to achieve the commitment of matching pre/post to be confirmed during detailed design, setbacks to Significant Wetlands and Significant Woodlands, and the proposed removal of a locally significant wetland as part of the Christie Road extension. It is acknowledged that a portion of forest planting is proposed; however, wetland offsets are not discussed, and Official Plan policies do not discuss net benefits.

The EIS does not recommend setbacks to Significant Woodland and Significant Wetland features or use them to establish a development limit. The EIS should recommend and justify setbacks and clearly show them on a figure. The setbacks should be protected in environmental protection blocks rather than occur within residential and future development blocks as shown in the EIS (see Figure 5).

It is recommended that the Municipality of Thames Centre review the proposed setbacks to Significant Woodlands and proposed wetland removal as OP policies do not provide specific setback guidelines. Based on a preliminary review of approved, publicly available EIS's in the Municipality of Thames Centre did not yield any examples of setbacks consistent with the proposed Acord development. However, it is unknown if this has been approved elsewhere or if this development poses the risk of setting a precent.

Wetland removal, water balance, and sanitary sewer placement concerns are raised in comments provided by the Upper Thames Conservation Authority (UTRCA). These comments are echoed in this review in the context of the OP with detailed analysis deferred to the UTRCA on their policies.

Reference: Scoped Environmental Impact Study – Application 9T-TC2501, Acorn Valley Subdivision Resubmission, Dorchester, ON

In addition to the comment responses provided in Attachment A, the following additional comments are provided:

Additional comments:

- Figures 2 and 5 appear to have some inconsistencies, Figure 2 is missing the wetland from Feature C shown on Figure 5. Secondly, Figure 2 legend states that the mapped wetlands **include** a 30 m setback, but Figure 5 shows this 30 m wetland setbacks encroaching into the Site on each of the 3 Features A, B, and C that is not shown on Figure 2. There are various inconsistencies between figures, particularly Figure 5, with respect to setbacks and encroachment, although some buffer encroachments are associated with open space blocks. Please clarify.
- Please discuss proposed Sanitary Design Alignment 2 as outlined in the Functional Servicing Report as it overlaps the Environmental Area associated with the 'C' vegetation communities. Impacts on natural features need to be addressed in the EIS.

4 Closing

Thank you for the opportunity to provide this Peer Review of the *Scoped Environmental Impact Study – Doug Tarry Limited, Acorn Valley Subdivision, Dorchester* (Vroom + Associates, revised December 2025) for the Municipality of Thames Centre. Several key matters remain unresolved with respect to demonstrating conformity with the Official Plan (OP) "no negative impact" test for the proposed development.

It is recommended that the Municipality review the proposed setbacks (stated as 4-6 m, although appear to be 0-6m) and determine if this setback is consistent with other developments in the Municipality to avoid the potential setting of a reduced setback precedent. UTRCA is expected to address the proposed wetland removals and setbacks associated with the Christie Road extension.

Sincerely,

STANTEC CONSULTING LTD.

Larson, Marla
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Date: 2026.02.13 14:31:54 -05'00'

Marla Larson B.Sc., ENVS
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Attachment(s):
Attachment A Terrestrial Comment Responses

February 13, 2026
Jarrod Craven

Reference: **Scoped Environmental Impact Study – Application 9T-TC2501, Acorn Valley Subdivision Resubmission, Dorchester, ON**

Attachment A Terrestrial Comment Responses

Comment Number	Agency	Consultant	Comment	Response	Status
#1	Stantec (Natural Environment)	Vroom & Associates	The EIS addresses the necessary components of the scoped assessment and identifies natural heritage features including woodlands, wetlands (provincially and locally significant), as well as significant wildlife, fish, and species at risk habitat; however, there are some substantial gaps in information or analysis within those sections that should be included for completeness and accuracy. Their inclusion will also make the proponent aware of their potential responsibilities prior to, during, and post-construction.	The EIS has been revised to address all technical comments provided.	Please clarify how this has been addressed to meet the policies outlined in the Municipality of Thames Centre Official Plan (OP) (Section 3.2.3 General Policies – Natural Heritage "Green-Space" System) as the project footprint overlaps with regionally Significant Wetland and Significant Woodland features. To address potential impacts to the ecological or hydrologic function, a feature-based water balance is proposed for the Tamarack Swamp Provincially Significant Wetland (PSW) at the detailed design stage that matches the water balance pre- to post-construction. Please confirm why other features (e.g., Christie Road regionally significant wetland (SWM2 (A1 Community)), unevaluated wetland, watercourses (Rath Harris Drain) are not included in this recommendation.
#2	Stantec (Natural Environment)	Vroom & Associates	The EIS does not mention that it is supporting a Zoning Bylaw Amendment and Official Plan Amendment. Furthermore, existing zoning is also not discussed under the policy section. This is covered under the Planning Justification Report but may warrant inclusion in the EIS.	This has been addressed within the revised EIS.	Addressed.

Comment Number	Agency	Consultant	Comment	Response	Status
#3	Stantec (Natural Environment)	Vroom & Associates	Please clarify where the Significant Valleyland designation was obtained.	This has been addressed within the revised EIS.	Addressed, although this is not mapped in provided figures, the following is stated in the scoped EIS: *The Significant Woodlands to the north and southeast (Figure 2; Feature B and C, respectively) are present in the surrounding valleylands*. Is this designation based on Official Plan mapping?
#4	Stantec (Natural Environment)	Vroom & Associates	It appears that the Christie Road extension is excluded from the draft plan of subdivision provided in Figure 5 but is discussed throughout the EIS and in a few places regarding impacts. Please clarify requirements for impact assessments and mitigation measures for the roadway from a policy perspective. If required, the test of no negative impacts has not been adequately demonstrated for the Christie Road extension.	This has been addressed within the revised EIS.	Please clarify/justify how this EIS demonstrates no negative impacts to the regionally significant wetland feature along the proposed Christie Drive extension. The Christie Drive wetland feature is considered a Group B Feature per the OP. The OP states that “Group B features - Development MAY be permitted within the wetland boundary and within 50 m of the wetland (adjacent lands) where an EIS demonstrates there will be no negative impacts on the natural features and their sustaining ecological or hydrologic functions”. The project footprint associated with Christie Drive extension results in direct loss of the regionally significant wetland. Direct loss is a clear negative impact. Please also see Comment #1.
#5	Stantec (Natural Environment)	Vroom & Associates	Notwithstanding the comment above, Section 1.1 states: The small isolated patch of Woodland in the center of the subject lands is not designated Natural Heritage, nor is the vegetation within the Christie Drive roadway extension. This statement fails to recognize the Environmental Area	This has been addressed within the revised EIS.	The comment that vegetation along the Christie Drive extension is not designated as natural heritage remains stated in the scoped EIS. However, Figure 5 in the scoped EIS shows the Christie Drive extension within a regionally significant wetland and certainly is within the 30 m setback buffer. The EIS also states: …the Thames Centre OP depicts "Environmental Area" lands surrounding the Rath-Harris Drain and behind the cultural pond in the west. Which is a Group A feature.

Comment Number	Agency	Consultant	Comment	Response	Status
			designation for the roadway extension on the Municipality OP and what this entails.		It is unclear how the statement that the vegetation adjacent to the Christie Drive extension is not designated as natural feature is accurate.
#6	Stantec (Natural Environment)	Vroom & Associates	Similarly, Section 1.2.2 identifies proposed impacts to FOD5 and SWM2 "surrounding" Christie Drive. What does it mean to be Natural Heritage vs. Environmental Area (i.e., Group C features)? What is permitted (or not)?	This has been addressed within the revised EIS.	Comment addressed, Group A features and prohibitions discussed in Section 1.3.3.
#7	Stantec (Natural Environment)	Vroom & Associates	Section 1.3.1 - There is no context regarding the SAR designations. The designations shown are federal designations, but the report does not discuss provincial designations of these species. If it did, it would indicate that the mussel is THR, not SC. There is a low likelihood of impacts with the recommended mitigation measures, but it still bears mentioning if for no other reason than to show it was considered.	This has been addressed within the revised EIS.	Addressed, the scoped EIS defines Species at Risk (SAR) in Appendix 1 as: *e.g. species that are "designated" by COSEWIC and/or listed under the Species at Risk Act [SARA]; species "designated" by COSSARO, including Endangered and Threatened species listed and regulated under Ontario's ESA; and provincially rare species [NHIC S-rank of S1 to S3]*
#8	Stantec (Natural Environment)	Vroom & Associates	Section 1.3.1 - Despite that the section includes information on the designations of the local municipal drains, it doesn't	This has been addressed within the revised EIS.	Please clarify how this has been addressed. Interaction between Drainage Act and Fisheries Act have not been addressed. It is relevant given the proposed changes to the channel.

Comment Number	Agency	Consultant	Comment	Response	Status
			direct the reader to a more fulsome discussion on how the Drainage Act and the Fisheries Act interact, which is quite relevant to this project. If the SWM pond is to outlet into the Rath-Harris Drain, the Drainage Superintendent needs to review the designs and sign off on them since each municipal drain is an engineered watercourse that, by law, is to be kept consistent with the designs unless otherwise agree upon (i.e., changed) by the local Drainage Superintendent.		
#9	Stantec (Natural Environment)	Vroom & Associates	Section 1.3.1 - Specifically, not in Section 1.3.1, but also nowhere else in the report does it discuss the Fisheries Act approval process in detail. Section 5.1 presents various considerations, with the ultimate conclusion that “As long as recommended mitigation measures are followed, we do not anticipate any harm to fish or aquatic habitat”. The first concern with this is that in Section 1.2.5, the report indicates the creation of a plunge pool and slope projection will be	This has been addressed within the revised EIS.	Please clarify how this has been addressed.

Comment Number	Agency	Consultant	Comment	Response	Status
			necessary at the outlet. That means work below the high water mark, which usually requires submission of a Request for Review to DFO to determine if there are Fisheries Act approvals required, none of which is mentioned. The second concern with the statement is that the legislative bar is not set at “harm” to fish and fish habitat. The requirement is that there is no or low likelihood of death of fish and/ or harmful alteration, disruption or destruction (HADD) of fish habitat. A more detailed discussion considering all these items should be provided.		
#10	Stantec (Natural Environment)	Vroom & Associates	In Section 1.3.3. “Environmental Area” is discussed under Group A Features. Please clarify if this is correct?	This has been addressed within the revised EIS.	Addressed.
#11	Stantec (Natural Environment)	Vroom & Associates	Section 1.4.4 states: The UTRCA regulation limit is 30 m from wetland boundaries and watercourses (in this case municipal drains). Any proposed development within the 30-meter setback is	This has been addressed within the revised EIS.	The EIS should recommend a setback to the wetlands and establish it as development limit. The setback should be natural self-sustaining vegetation in an environmental protection block, not a development block. Figure 5 does not show a wetland development setback distance. The site plan on Figure 6 also extends to the west beyond the Site boundary as well.

Comment Number	Agency	Consultant	Comment	Response	Status
			subject to CA review and approval. It is our understanding from the EIS that development is not proposed within 30 m of wetlands but is proposed within regulated areas. Therefore, the EIS should support consultation with UTRCA re: permitting due to the presence of regulated areas the subject lands.		Work within 30-m of the wetlands or other regulated areas is subject to authorization and is deferred to the UTRCA.
#12	Stantec (Natural Environment)	Vroom & Associates	Although the EIS states: With reference to section 4.1.8 of the PPS, we do not anticipate any direct negative or unalterable impacts to the Natural Heritage feature on-site or its ecological functions as the vegetation on site is low quality, and for reasons noted in Section 4, there will be minimal direct or incidental impacts on the surrounding Natural Heritage area - it appears that the EIS does not provide enough analysis to demonstrate no negative impacts to ecological functions on the adjacent features, particularly as encroachment on a Significant Woodland and lack of	This has been addressed within the revised EIS.	Please clarify/elaborate on how this EIS illustrates no negative impact to the Significant Woodland. Significant Woodlands fall under Group B features. The OP states that “Group B features - Development MAY be permitted within the woodland boundary and within 50 m of woodland (adjacent lands) where an EIS demonstrates there will be no negative impacts on the natural features and their sustaining ecological or hydrologic functions”. The project footprint appears to overlap with the Significant Woodland feature, and this direct loss is a negative impact.

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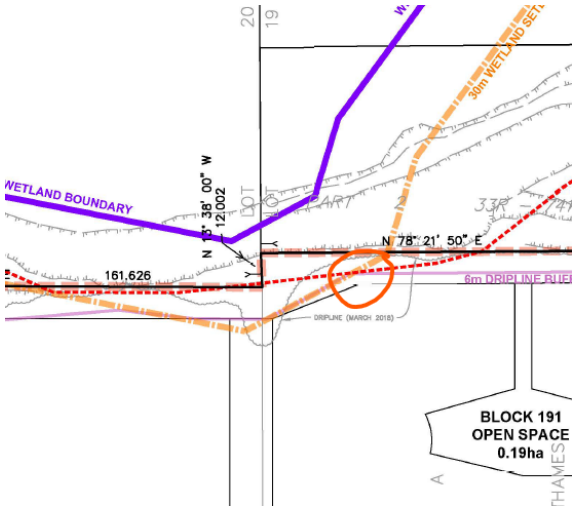
			setbacks in some areas are proposed.		
#13	Stantec (Natural Environment)	Vroom & Associates	There is little discussion about the County Official Plan policies and designations.	This has been addressed within the revised EIS.	Addressed.
#14	Stantec (Natural Environment)	Vroom & Associates	Section 2.2 states: As previously mentioned, there are "Natural Hazard" lands to the southwest, north, and southeast. These slopes require erosion hazard setbacks. A geotechnical study (Englobe 2024) demonstrated that a 6 m setback from top of stable slope is recommended in all areas. Where is adherence to this setback identified? The draft plan of subdivision shows a 6 m dripline setback to the north and a 30 m wetland setback throughout. However, there does not appear to be a setback in the south in the area circled (open space block behind lot 160 in cul-de-sac)	This has been addressed within the revised EIS.	Erosion limit is shown on Figure 5, but the 6 m setback appears to be on the edge of vegetation and not the erosion limit. It is not clear if the 6 m setback falls entirely within the open space block. 
#15	Stantec (Natural Environment)	Vroom & Associates	Various details on wetlands are provided in Section 2.4 followed by: This should be confirmed by a hydrogeologist. It is unclear why this has not been	This has been addressed within the revised EIS to include coordination with the	Addressed.

Comment Number	Agency	Consultant	Comment	Response	Status
			confirmed with a hydrogeologist during the preparation of the EIS and the supporting Hydrogeological investigation report referenced that was authored by Englobe (2024). This resurfaces again in Section 4.4.2 where input from a hydrogeologist is critical to demonstrate no impacts.	Hydrogeologist for the site.	
#16	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - A comprehensive multi-season and multi-year field survey program was implemented for flora, fauna, herptiles, and aquatic habitat.	Acknowledged.	Addressed.
#17	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - Confirm what type of agricultural field comprises the bulk of the subject lands. This is relevant to discussions on Bobolink later in the EIS.	This has been addressed in the revised EIS.	Addressed.
#18	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - Tables 2 and 3 state that the Floristic Quality Index (FQI) is provided. Which column is the FQI? Also please clarify what CC and CW are.	This has been addressed in the revised EIS.	Addressed.

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#19	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - Please clarify how communities were classified as “high-quality” or “low-quality.”	This has been addressed in the revised EIS.	The cultural communities are considered low to medium quality. After that it appears to be based on the FQA, number of species and CC. Please note that the habitat description for the Tamarack Organic Swamp provided by Blue Oak native Landscapes in Appendix 2 indicates it is a high quality feature and sensitive to hydrological changes. Evidence of this sensitivity includes: groundwater dependent features such as Tamarack, Black Ash and organic soils; SAR (Black Ash); and, provincially rare vegetation (Poison Sumac Organic Thicket Swamp). It is critical to maintain the water balance to this feature in order to maintain these rare and sensitivity functions, including the proportional contribution of groundwater and surface water. Additionally, Blue Oak Native Landscapes reports several occurrences of Black Ash (SAR) in the southwest swamp, which is sensitive to hydrological change.
#20	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - Was a background review completed to guide the field program?	This has been addressed in the revised EIS.	Additional background information has been added to the scoped EIS. Please clarify if a background records review for plants and wildlife (i.e., a search of the NHIC database, wildlife atlases, etc.) was completed. Also applies to Comment #31.
#21	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - Feature numbering on Figure 2, (e.g., Figure A, B, C) is very helpful. However, Mill Pond, the western pond and the irrigation pond are mentioned throughout the EIS but do not appear to be shown on Figures for clarity.	This has been addressed in the revised EIS.	Addressed. Ponds mapped on Figure 2 and discussed based on location (e.g., southeast, west), although Mill pond still not labelled but is better described in the text.

Comment Number	Agency	Consultant	Comment	Response	Status
#22	Stantec (Natural Environment)	Vroom & Associates	Section 3 Biological Attributes - “Given the proposed removal of the western pond, both ponds were inspected for turtle activity”. Please clarify where turtle basking surveys were completed by labelling the ponds on the map or through ELC community codes.	This has been addressed in the revised EIS.	Addressed, additional locational details provided in text but not mapped.
#23	Stantec (Natural Environment)	Vroom & Associates	Significant Wildlife Habitat - There appears to be some inconsistencies in species designations between Section 3.2 (e.g., Barn Swallow [THR/THR]) and elsewhere in the EIS.	This has been addressed in the revised EIS.	Barn Swallow still showing as THR/THR in subconsultant memo (appropriate based on the time of writing) but also in the body of the report. However, this species is considered SAR regardless per report definition (SC now) although it does not appear to be mapped on Figure 11.
#24	Stantec (Natural Environment)	Vroom & Associates	Significant Wildlife Habitat - Species designated as Special Concern are included under the Species at Risk heading although they are correctly identified as not having protection under the ESA and are also addressed under Species of Conservation Concern for Significant Wildlife Habitat.	This has been addressed in the revised EIS.	Addressed.
#25	Stantec (Natural Environment)	Vroom & Associates	Significant Wildlife Habitat - One Eastern Wood-Pewee location was determined to be an anomaly due to the small, isolated, and poor-quality	This has been addressed in the revised EIS.	Addressed. It is our understanding that this is based on advice from a faunal specialist.

Comment Number	Agency	Consultant	Comment	Response	Status
			nature of the small woodland patch in the middle of the fields (and shown on Figure 11). Although this conclusion is likely true, a more detailed analysis of significance is recommended because, per COSEWIC 2012: Generally, size of forest fragments does not appear to be an important factor in habitat selection (Stauffer and Best 1980; Blake and Karr 1987, Robbins et al. 1989, Freemark and Collins 1992; Desrochers et al. 2010). However, the species is known to occur less frequently in woodlots with surrounding residential development than in those without houses (Friesen et al. 1995; Keller and Yahner 2007). Eastern wood-pewee (Contopus virens): COSEWIC assessment and status report 2012 - Canada.ca		

Comment Number	Agency	Consultant	Comment	Response	Status
#26	Stantec (Natural Environment)	Vroom & Associates	Significant Wildlife Habitat - Confirm the size of the woodlot to the north to subsidize the area-sensitive woodland breeding bird analysis where Pileated Woodpecker, Yellow-bellied Sapsucker, and Red-breasted Nuthatch were observed.	This has been addressed in the revised EIS.	Addressed. Based on the ELC 'B' communities located within the 'north' woodlot included in the ELC table under Section 3.1 with their sizes. The Tamarack Swamp that is made up of all 9 'B' communities, is listed as historically being evaluated at 17.89 ha in size by MNRF in 1985. If communities provide less than 30 ha, it would not meet the SWH criteria.
#27	Stantec (Natural Environment)	Vroom & Associates	Significant Wildlife Habitat - It is unclear if SWH for overwintering turtles is considered present or absent based on the discussion provided. At one point it is stated it is SWH but then later discussed in detail how it is poor quality, have existed for only a short period of time, and anthropogenic. Please confirm the final list of SWH in the unlabeled summary table prefaced by: Heritage features noted below.	This has been addressed in the revised EIS.	Please clarify whether there is SWH for overwintering turtles or not on the site. Unlabeled summary table that is referred to still states SWH for overwintering turtles as "To be discussed in this Study." Section 3.2 of EIS states that the observation of SOCC turtle qualifies the pond for SWH. Further down, the ponds are noted as poor quality and unlikely to support overwintering. Section 2.2 of attached files states that the ponds were suitable overwintering habitat for turtles in 2019. Section 2.3 of attached files states that they are not suitable habitat in 2022.
#28	Stantec (Natural Environment)	Vroom & Associates	Species at Risk - "Six Bobolink (COSEWIC: Threatened, COSSARO: Threatened) individuals, four males and two females, were observed within the agricultural crop. Although no nesting indicators were observed, the behaviour was	This has been addressed in the revised EIS.	It is our understanding the following pertains only to Black Ash: although the proposed development will require authorizations under the Endangered Species Act, including a C- Permit for impacts to a species at risk, these provincial approvals are pursued independently and do not preclude or delay the issuance of municipal planning approvals. It is agreed that SAR is the jurisdiction of the Ministry of Environment, Conservation and Parks; however, the OP

Comment Number	Agency	Consultant	Comment	Response	Status
			indicative of nesting birds. However, the ESA (2007) O. Reg. 242/08 states that "Clause 9 (1) (a) the Act does not apply to a person who kills, harms or harasses a bobolink or an eastern meadowlark while carrying out an agricultural operation." Please note that the ESA has been updated such that “harass” has been removed from Clause 9. Additionally, the proposed subdivision does not fall under the agricultural exemption and is potentially a misleading statement. What actions are proposed to compensate for the loss of large areas of Bobolink habitat to facilitate the proposed subdivision?		includes SAR habitat qualifies as Group A features, which prohibits development within that feature. For this reason, please clarify how Bobolink will be addressed.
#29	Stantec (Natural Environment)	Vroom & Associates	Species at Risk - It is agreed that Butternut will not likely be impacted at a 20 m setback. However, confirmation of butternut health status through a health assessment or that the development is located outside the critical root zone may be helpful.	This has been addressed in the revised EIS.	It appears that a butternut health assessment was not completed, however, it is noted in Section 3.3 and 4.2.4 that “the tree (*Butternut*) exhibits evidence of mordancy (canopy decline and cankers present).” In the absence of a full assessment, please confirm the 20 m setback with a buffer or measurement on mapping to confirm that no impacts are anticipated.

Comment Number	Agency	Consultant	Comment	Response	Status
#30	Stantec (Natural Environment)	Vroom & Associates	Species at Risk - It is our understanding that the MECP has been contacted regarding an overall benefit permit for Black Ash. Seven trees >1.37 m height or 8 cm dbh are within the proposed road construction area. Are any else proposed for removal? Were health assessments completed on these trees to determine which are protected? What are the different colours on Figure 12?	This has been addressed in the revised EIS.	Partially addressed. It is presumed that all trees that will be removed are included on Figure 12, the different colors on Figure 12 are included in the figure legend. Please elaborate/clarify the Black Ash health assessment methods and results. The only reference to Black Ash health assessments included Section 3.3 “See Appendix 3 for an assessment of these trees”. Appendix 3 includes a photolog of each Black Ash observed with brief mention in caption of trees that were “unhealthy” or had “large canker” or “top down canopy decline”. Do these trees qualify for protection or not?
#31	Stantec (Natural Environment)	Vroom & Associates	Species at Risk - Are Blanding’s Turtle expected to occur in the Study Area? If so, why was the Blanding’s Turtle protocol Survey Protocol for Blanding’s Turtle (*Emydoidea blandingii*) in Ontario not implemented?	This has been addressed in the revised EIS.	Per Comment #20, it appears that a background records review was not completed. Both NHIC 2026 (square 17MH9358, 17MH9458) and ORAA 2019 (17MH95) note observations of Blanding’s Turtle within atlas squares that encompass the Study Area. There is no mention of potential habitat for Blanding’s Turtle in EIS. Please clarify potential for the site to support Blanding’s Turtle (a SAR).
#32	Stantec (Natural Environment)	Vroom & Associates	Species at Risk - Bat species at risk are mentioned with timing mitigation measures (see Impact Assessment and Mitigation) but impacts to habitat are not discussed. Has the ongoing consultation with MECP regarding black ash	This has been addressed in the revised EIS.	Please clarify whether consultation with MECP regarding other SAR is occurring. Butternut, Bobolink or SAR bats have not been mentioned in the EIS regarding consultation with MECP. MECP is only referenced in relation to hydrology, drilling, general policy identifying IGF as a self-screening process, and that consultation for Black Ash is ongoing.

Comment Number	Agency	Consultant	Comment	Response	Status
			included butternut, Bobolink, or bat species at risk?		
#33	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - The tree cutting window provided in Recommendation #1 should be extended from March 15 (if Small-footed Myotis may occur) to November 30th (for migratory bats). This is consistent with recent consultation with MECP.	This has been addressed in the revised EIS.	As no background review appears to have been completed, it is unclear if Small-footed Myotis may occur in the Study Area. This species is quite rare so April 1 may be appropriate. However, migratory bats occur throughout the Study Area and should extend the active period to November 30th per recent MECP guidance. Recommendation #1 Remains as "Tree-cutting should not occur between March 31st and October 31st to avoid the risk of removing trees used by migratory birds and potentially roosting SAR bats."
#34	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - It is understood that one Pileated Woodpecker was noted during the breeding bird surveys. Please confirm that no evidence of Pileated Woodpecker nesting was identified within the proposed road allowance expansion as these nests are protected year-round under the Migratory Birds Regulation.	This has been addressed in the revised EIS.	Pileated Woodpecker is listed as occurring in Quadrant 3 in the attached datasheets. Q3 includes the North wetland / woodland. Section 3.2 briefly discusses "To the north, there was one individual of Yellow-bellied Sapsucker, Red-Breasted Nuthatch, and Pileated Woodpecker species. If breeding pairs or evidence of nesting was recorded, that community could qualify for SWH. The data only demonstrated possible nesting behaviour, being observed during the breeding season in suitable habitat rather than confirmed breeding behaviour." It is presumed that this means Pileated Woodpecker was not observed nesting, and there are no nests identified within the proposed road allowance or anywhere else in the Study Area.
#35	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Please confirm setbacks. Earlier in the EIS it was stated a 6 m setback is required for hazards, the site	This has been addressed in the revised EIS.	As outlined in **Section 4.3** "As previously noted, a 10 m buffer is typically required for significant woodlands. However, a reduced buffer size is possible if a net ecological gain can be demonstrated for the Study Area (i.e. compensation, invasive species removal, habitat

Comment Number	Agency	Consultant	Comment	Response	Status
			plan shows 6 m setbacks on the woodland in the north. But not in the southeast. There is a distance ranging from 0-6 m between the development envelope and the dripline of the Significant Woodland features on the periphery of the site. It is recognized in the EIS that these edges are primarily young but also that 10 m is a typical significant woodland setback. Justify the differences in setbacks.		creation, enhancements, etc.). The proposed development included 4-6 m dripline setbacks from the Significant Woodlands. It is our opinion that, given the following enhancements, habitat creations, invasive species removal, and the mitigation in Sections 4.2 and 4.3, these proposed development limits are acceptable." Four- and six-meter woodland setbacks are indicated but on Figure 5 they encroach into residential and future Blocks. Setbacks should establish the development limit and be maintained as self-sustaining natural vegetation within environmental protection Blocks not development Blocks. Please clarify if this is the intent. Wetland setbacks are not provided. The figure should clearly identify the development setbacks from woodlands and wetlands and justify the distances. For example, the woodlands / wetlands support many rare and sensitive features, including: groundwater dependent features such as Tamarack, Black Ash and organic soils; SAR (Black Ash); provincially rare vegetation (Poison Sumac Organic Thicket Swamp), and 48 regionally rare / uncommon species (as reported by Blue Oak Native Landscapes in Appendix 2 of the EIS). Development within the future block will create new disturbance pathways to these features, hydrological changes, invasive species, vegetation trampling and smothering, light disturbance to wildlife, recruitment of urban tolerant wildlife, etc. Setbacks are a principal mitigation strategy to offset these impacts, and an adequate assessment of potential impacts or justification for minimal (4- and 6-m) setbacks is not provided.
#36	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Recommendation #4 states that pond filling should occur outside of the	This has been addressed in the revised EIS.	Not addressed. Please clarify that winter pond removal is not recommended, and/or when pond removal can occur.

Comment Number	Agency	Consultant	Comment	Response	Status
			breeding season (spring and summer, March - August) to protect amphibians. However, an amphibian and reptile salvage is also recommended. Please clarify that winter removal is not recommended.		"Recommendation #8: Amphibian salvage should be conducted during pond removal. This would include a pre-removal survey, and pre-determined suitable habitat to relocate any animals found."
#37	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Typically, a 10 m buffer is required for significant woodlands. However, a reduced buffer size is possible if a net ecological gain can be shown for the Study Area (i.e. compensation, invasive species removal, habitat creation, enhancements, etc. Please clarify the source of this guidance.	This has been addressed in the revised EIS.	See Comment #35.
#38	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Monitoring tree health is included in Recommendation #15. Are there any other monitoring recommendations included in the EIS? What about vegetation plantings, erosion and sediment controls, stormwater management, invasive species?	This has been addressed in the revised EIS.	Addressed, suggestions for invasive species, restoration, and ESC monitoring for the first three years is mentioned under Section 5 Mitigation Measures.

Comment Number	Agency	Consultant	Comment	Response	Status
#39	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Statements throughout the EIS regarding water balance do not appear to incorporate details from the Functional Servicing Report or the Hydrogeological Report. "This should be confirmed with a hydrogeologist" should not be a recommendation but instead be completed at this stage. For the 46.22 ha subject lands, 51.2% drain to the Rath-Harris Drain in the southeast, 18.7% contributes to the northern wetland, 9.1% to the westerly wetland and the remaining 21% outlet to Shaw Drain…Given that the SWM design focuses on conducting flow to the Rath-Harris Drain, this matches pre-development conditions". It is unclear how these conflicting statements will result in matching pre-existing conditions. The FSR states: without any mitigation measures, the groundwater infiltration could potentially be reduced to approx. 37% of pre-development levels.	This has been addressed in the revised EIS.	Addressed in the following Recommendations: Recommendation #27: At detailed design, the civil engineer and hydrogeologist shall confirm that road grading and drainage details do not create localized barriers to lateral soil moisture movement along the wetland margin. If impacts are detected, additional infiltration or subdrain modifications shall be incorporated." Recommendation #17: Given significant groundwater recharge areas on the subject lands, Low Impact Development (LID) features should be targeted to those lands to promote infiltration and maintain existing groundwater recharge. Please also see Comment #1 regarding the feature-based water balance which can be confirmed at detailed design.

Comment Number	Agency	Consultant	Comment	Response	Status
#40	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - The test of no negative impacts to adjacent features with respect to water balance have not been achieved in the EIS. Recommendation #17 acknowledges this lack of conformity and Stantec supports the requirement for a detailed water balance that matches pre- and post-development of timing and delivery. This also has implications for Fisheries Act approvals. If there is a change in water balance, including flows feeding either of the watercourses or any of the wetlands, there are potential negative impacts to fish and fish habitat that would need to be documented in reporting or application forms submitted to DFO.	This has been addressed in the revised EIS.	See Comment #1 about feature-based water balance required at the detailed design stage. Commitments to match pre- to post-development will be required to meet the test of no negative impact.
#41	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Recommendations regarding the requirement of LIDs, runoff buffer strips, and water quality and quantity control of the stormwater management facility that outlets to the Rath-	Acknowledged.	Acknowledged.

Comment Number	Agency	Consultant	Comment	Response	Status
			Harris Drain are suitable and appropriate.		
#42	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Corridor size and connectivity impact assessment neglects to consider the Christie Road extension.	This has been addressed in the revised EIS.	"Corridor Size and Connectivity: The proposed development will have no impact on the size and connectivity of the Natural heritage features as a whole, given the marginal intrusion on the very edge of the communities and no disconnect of habitat." Please clarify/elaborate on the Corridor size and Connectivity impacts to the Christie Road extension.
#43	Stantec (Natural Environment)	Vroom & Associates	Impact Assessment and Mitigation - Due to the location of Christie Road within a wetland, additional measures are recommended, including reptile/amphibian road crossing structures under the roadway, to maintain connectivity and mitigate road mortality.	This has been addressed in the revised EIS.	Not addressed. Please clarify/include additional mitigation measures for reptile/amphibian road crossings for Christie Road. Section 4.2.3 Construction of Christie Drive outlines recommendations #23 to #27 (permeability measures to maintain lateral flow, careful construction sequencing, salt-tolerant plant buffers, and a feature-based groundwater assessment) for mitigation during road construction, none of which outline reptile/amphibian road crossing structures or concerns. Also, it is noted that the UTRCA has included specific wetland comments during their review as well.

Stantec Consulting Ltd.
300W-675 Cochrane Drive
Markham ON L3R 0B8

February 6, 2026

Project/File: 161414695

Ms. Amanda Storrey, Director of Planning and Development Services
Municipality of Thames Centre
4305 Hamilton Road
Dorchester, ON N0L 1O3

Ms. Storrey,

Reference: Geotechnical Peer Review – Updated Geotechnical Report - Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

1 Introduction

The Municipality of Thames Centre (The Municipality) requested that Stantec Consulting Ltd. (Stantec) complete a peer review of the geotechnical investigation report prepared by Englobe Corp. (Englobe) for the proposed residential development captioned above (herein referred to as the Site).

The results of the peer review were provided in Stantec's letter dated October 10 2025.

The Municipality subsequently forwarded Stantec a copy of Englobe's updated report which was prepared to address the peer review comments provided by Stantec.

This letter provides the results of Stantec's subsequent review to confirm that all pertinent review comments were satisfactorily addressed in Englobe's updated report.

2 Documents Reviewed

The updated geotechnical investigation report provided to Stantec by The Municipality for the proposed residential development is referenced as follows:

- Geotechnical Engineering Report, Proposed Acorn Valley Development, 83 Christie Drive, Dorchester, Ontario, Reference 04-02208613.000.0100-0101-GS-R-0001-04, dated January 7, 2026 (Revised Report), prepared by Englobe Corp. for Cyril J. Demeyere Limited.

Reference: Geotechnical Peer Review – Developer's 2nd Submission Proposed Residential Development – Phase I 168 County Road 49 Township of Harvey, Municipality of Trent Lakes, ON County File Number 15T-23001

3 Updated Geotechnical Investigation Report Review Comments

The comments provided in the initial peer review were provided in two forms: "Recommendation" and "For Consideration". Recommendation comments were considered fundamental to providing the necessary information for purposes of design and construction. For Consideration comments were offered as suggestions for clarifications or additions that may assist the designers, regulatory authorities, and other readers in understanding specific aspects of the report and/or to address inferred typos or suggested grammatical edits for clarity.

The comments provided were referenced to the section numbers and headings provided in the report, with specific reference to paragraphs, tables, lines and/or bullets, or to specific pages/documents included in the appendices.

The updated version of the geotechnical investigation report prepared by Englobe has addressed all recommendations and for consideration comments arising from Stantec's peer review of the initial geotechnical investigation report with the exception of the following.

6.4 Slab-On-Grade Construction

For Consideration 11 – Paragraph 1, Sentence 1: Consistent with previous discussion and recommendations in the report, the native founding soil could consist of either native sand or native silt.

For Consideration 12 – Paragraph 2, Sentence 5: It is inferred that the 95% compaction reference applies to the "granular fill base" material and not to the "clean earth fill" as clean earth fill placed as engineered fill on the project is to be compacted to 98% (Section 6.1 Site Preparation).

Englobe's statement in the comments/responses table for both comments referenced above was follows:

Revised accordingly Updated the bearing stratum. Updated both to 98 percent SPMDD.

Can the authors please clarify and confirm the reference "Updated both to 98% SPMDD"? The compaction referenced in Paragraph 2, Sentence 5 for the underlying undisturbed native subgrade or clean earth fill was changed from 95% to 98% in the updated report. However, the compaction referenced in Paragraph 2, Sentence 1 for the granular base under the basement floor slab remains at 95%. It is inferred that the Authors also intended to revise the recommended compaction of the granular base to 98%, consistent with general industry standards. Please confirm if that is the case and complete the update/edit.

Exclusive of the one item referenced above, Stantec considers all other comments closed.

Reference: **Geotechnical Peer Review – Developer's 2nd Submission Proposed Residential Development – Phase I 168 County Road 49 Township of Harvey, Municipality of Trent Lakes, ON County File Number 15T-23001**

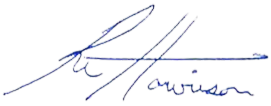
4 Closure

If you have any questions or require clarification, please do not hesitate to contact the undersigned.

Best regards,

STANTEC CONSULTING LTD.

John J. Brisbois MScE., P.Eng.
Principal, Geotechnical Engineering
John.brisbois@stantec.com



Ron Howieson P.Eng.
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Stantec Consulting Ltd.
300W-675 Cochrane Drive
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February 18, 2026
Project/File: 161414695

Ms. Amanda Storrey, Director of Planning and Development Services
Municipality of Thames Centre
4305 Hamilton Road
Dorchester, ON N0L 1O3

Ms. Storrey,

Reference: 2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

1 Introduction

The Municipality of Thames Centre (The Municipality) has requested that Stantec Consulting Ltd. (Stantec) complete a peer review of the 2nd Submission hydrogeological study report prepared by Englobe Corp. (Englobe, 2024) for the proposed residential development captioned above (herein referred to as the Site). Stantec understands that the proposed residential development will be fully serviced with municipal sanitary sewers and water supply.

The opinions and comments provided herein are based on the review of the hydrogeological study report referenced. Stantec has not conducted a Site visit to confirm the conditions reported nor verified the data and information provided in the hydrogeological study report reviewed and, as such, assumes no responsibility for the information contained therein. The responsibility for the information provided in the hydrogeological study report remains with the author(s) of the report.

Reference: 2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

Stantec Comment (October 22, 2025)	ENGLOBE Response (January 8, 2026)	Outstanding Concerns
2 Hydrogeological Study Methodology - The scope of the study was found to be suitable for the scale of the proposed development on municipal services.	Acknowledged.	Comment addressed.
2.2.3 Guelph Permeameter Analysis - The test pit locations where the Guelph Permeameter tests were completed are not shown on the drawings.	Test pits locations were added to Drawing 1 of Appendix A	Comment addressed.
3.1 Stratigraphy - The stratigraphy was found to consist of 0.2 m to 0.5 m of topsoil underlain by sand with variable silt content. The depth of the sand unit was determined from local Water Well Records and found to range from 20 to 55 m below ground surface (BGS). One exception was BH12-19 where 2.0 m of peat was found at surface.	Acknowledged.	Comment addressed.
3.2 Hydraulic Conductivity and Design Infiltration Rates - Hydraulic conductivity values ranged from 1.2 x 10-5 m/s to 1.3 x 10-4 m/s. Infiltration rates were estimated to range from 1.3 to 57.3 mm/hr across the Site, for a geometric mean of 27.8 mm/hr. A safety factor of three was applied to these rates when calculating the Design Infiltration Rate. These results are consistent with sand having varying amounts of silt. Clarification is required on whether horizontal hydraulic conductivity estimates obtained from the monitoring wells were converted to vertical hydraulic conductivities prior to converting these values to an infiltration rate. The vertical hydraulic conductivity of a soil can range from an order to two orders (for claybased soil) of magnitude lower than the corresponding horizontal hydraulic conductivity. If horizontal hydraulic conductivity estimates were not adjusted, the estimated infiltration rates from these values will be higher than expected, which could have implications on LID infiltration facility design.	Section 3.2 recommends the use of Guelph permeameter for infiltration rates estimation. Guelph permeameter test execution was considered representative of conditions that could occur in an open channel like the one considered in the concept at current time.	Comment addressed.

Reference: 2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

Stantec Comment (October 22, 2025)	ENGLOBE Response (January 8, 2026)	Outstanding Concerns
3.3 Groundwater Elevations, Flow Direction - The April 29, 2020 groundwater levels are referenced and contoured in Drawing 2. This section would benefit from further discussion, including: 1. Confirmation that the April 29, 2020, groundwater levels are representative of the high groundwater table. 2. Explicitly stating the groundwater flow direction is in a northeasterly direction as opposed to just referencing Drawing 2. 3. A discussion on the depth to the high groundwater table beneath the Site. This discussion will aid in the analysis of whether high groundwater levels will be a problem for basement foundations or site servicing throughout the Site. 4. A discussion of the mini-piezometer data with respect to surface water features and wetlands. Are these features groundwater recharge or discharge features? Do they need groundwater inputs originating from the Site to maintain their function.	Added to section 3.3	Comment addressed.
3.4.2 Nitrate - Stantec agrees with the statement that changing the land use from agricultural to residential is likely to lower nitrate concentrations in groundwater over time.	Acknowledged.	Comment addressed.
3.5 Pre-Development Water Balance - The pre-development water balance resulted in an average infiltration rate of 248 mm/year. Stantec agrees that this infiltration rate is likely to be conservative. The pre-development water balance shows annual infiltration of about 63,637 m3/yr, which is consistent with the proposed development area and average infiltration rate.	Acknowledged.	Comment addressed.
3.6 Post-Development Water Balance - The post-development water balance shows an infiltration deficit of about 40,253 m3/yr or approximately 63% of the pre-development infiltration, which is consistent with a development of this size and density.	Acknowledged.	Comment addressed.

Reference: 2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

Stantec Comment (October 22, 2025)	ENGLOBE Response (January 8, 2026)	Outstanding Concerns
3.7 Comments on LID measures - The proposed LID measure consists of an open channel located on the northern side of Christie Drive. Stantec requires clarification on how water would be conveyed to this channel. Further clarification is also required on whether infiltrating stormwater at one location would maintain the from and function of all the surface water features and wetlands surrounding the proposed development. A decentralized LID measure such as rear lot swales would be preferred. A pre- and post-development feature based water balance for the surface water features and wetlands should be performed to help in assessing the most suitable LID strategy for the Site. Stantec agrees that only high quality water from rooftops and green spaces be infiltrated. Runoff from roadways should be directed to the stormwater management pond. Stantec also agrees that a post-development groundwater monitoring program be implemented at the Site.	Acknowledged.	Comment not addressed. Please provide an alternate LID strategy that addresses Stantec's concerns. Please also provide feature based water balances for the surface water features and show how the LID strategy will be protective of these features.
4 Dewatering Assessment - Englobe states that no basement foundations would be constructed below the high groundwater table as drainage would be problematic and Stantec agrees with this statement. Some preliminary dewatering rates were calculated for site services and construction of the stormwater management pond. Stantec recommends that these dewatering rates be revisited during detailed design and confirmed with pumping from open test excavations so the contractor can develop an effective dewatering plan. Englobe suggests that a Category 3 Permit To Take Water would be required; however, recent amendments to the permitting requirements indicate that the construction dewatering can be completed with an Environmental Activity and Sector Registry (EASR).	Update to section 4.3	Comment mostly addressed. Please commit to revisiting the dewatering calculations during detailed design and adjust as needed.
5.1 Water Users - Englobe recommends that residents on private wells located within the predicted dewatering zone of influence be notified prior to the start of dewatering and that the contractor be prepared to deal with any groundwater interference complaints. Groundwater interference complaints should be handled by a qualified professional.	Residents within the proposed dewatering zone of influence will be notified prior to the start of dewatering and the contractor will be prepared to deal with groundwater interference complaints. Englobe will be consulted to ensure that all construction methods will be in accordance with the future EASR filing, if required.	Comment addressed.

Reference: 2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25

Stantec Comment (October 22, 2025)	ENGLOBE Response (January 8, 2026)	Outstanding Concerns
In summary, there does not appear to be any hydrogeological constraints that would prevent this development from proceeding as proposed. As part of detailed design, Stantec recommends that the dewatering assessment be revisited to confirm pumping rates and predicted zone of pumping influence. During detailed design a decentralized LID strategy should be developed in an effort to match pre-development recharge and maintain groundwater levels across the Site as close to pre-development levels as possible.	Acknowledged.	Comment addressed.

Reference: **2nd Submission Hydrogeological Peer Review – Acorn Valley Development – 83 Christie Drive, Dorchester, ON - County File Application 39T-TC2501, O3-25, Z20-25**

2 Closure

If you have any questions or require clarification, please do not hesitate to contact the undersigned.

Best regards,

Stantec Consulting Ltd.

Digitally signed by Freymond, Roger
Date: 2026.02.18 14:02:12 -05'00'

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Whitehead, Grant
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Grant Whitehead MES, P.Geo. (Limited)
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Stantec

Memo

To:	Darryl Hern London	From:	Isaac Austin London
Project/File:	161414695	Date:	February 6, 2026

Reference: Acorn Subdivision, Christie Dr. Dorchester - FSR Comments

The following are the compiled functional servicing report (FSR) comments based on the review of the following documents:

- Draft Plan dated January 8, 2026, by CJDL,
- Acorn Valley Subdivision Functional Servicing Report dated January 8, 2026, by CJDL,

The comments are as follows:

1. Note that per section 7.3.9 of the Thames Centre engineering design standard no more than 50 units with individual water services can be serviced from a single source of supply. Until the looped connection to Mill Street is completed, build out will be limited to 50 individual services.
2. It is the preference of the Municipality to keep the proposed sanitary alignment within the right of way to provide better access for maintenance and repair.
3. It is noted the proposed population exceeds what was allocated for the area. The Municipality will need to review and confirm whether the current pumping station will require upsizing before accepting populations above what is currently allocated for the development.

This concludes the FSR comments for this Draft Plan submission.

Regards,

Stantec Consulting Ltd.

Isaac Austin C.Tech
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stantec.com
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Memo

To:	Darryl Hern London	From:	Adam Kristoferson London
Project/File:	161414695	Date:	February 13, 2026

Reference: Acorn Subdivision, Christie Dr. Dorchester - SWM Comments

The following are the compiled stormwater management (SWM) comments based on the review of the following documents:

- Draft Plan dated January 8, 2026, by CJDL,
- Acorn Valley Subdivision Stormwater Management Report dated January 8, 2026, by CJDL,
- Comment Responses dated January 8, 2026, Various,
- Geotechnical Engineering Report dated January 7, 2026, by Englobe,
- Proposed Acorn Valley Development Hydrogeology Study Report dated December 19, 2025, by Englobe,
- Scoped Environmental Impact Study dated December 2025, by Vroom + Associates.

The comments are as follows:

1. Thank you for the pond liner design. Still to be addressed is consideration be given for the possibility of that liner to float due to hydro static pressure from high groundwater. Please consider this during detail design.

This concludes the SWM comments for this Draft Plan submission.

Regards,

Stantec Consulting Ltd.

Digitally signed by Kristoferson, Adam
Date: 2026.02.13 15:39:14-05'00'

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