

Although D-5-5 requires only one (1) water quality sample during the last hour of the test; County of Lanark and Mississippi Valley Conservation Authority (MVCA) prescribes the collection of two (2) water quality samples for hydrogeological investigations in support of subdivision application plans.	Acknowledged. Cambium collected a second sample for the "subdivision suite" when resampling TW1
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Comment Source	Comment	Response	Updated Document Reference
Alderville First Nations	Alderville First Nation is requiring a File Fee for this project in the amount of \$300.00. This Fee includes administration, an initial meeting, project updates as well as review of standard material and project overviews. Depending on the number of documents to be reviewed by the Consultation Department, additional fees may apply. Please make this payment to Alderville First Nation and please indicate the project name or number on the cheque.	This payment has been made.	

Comment Source	Comment	Response	Updated Document Reference
EIS Peer review (Aboud & Associates)	Introduction and Objective Section 1.0 requires further detail in regards to the subject property and proposed development, particularly regarding the history of the subject property and the existing surrounding land uses. It is noted multiple times throughout the report that clearing of vegetation had occurred within the limits of the subject property. Clarification as to the timing and rationale for vegetation clearing is pertinent information. The identification of the study area (120m) should be stated at the onset of the EIS, as opposed to first being mentioned in Section 4.0.	Add property history and clearing timeline; move study area definition to Section 1.0.	Section 1.0 has been revised to address peer review comments requesting additional detail on site history, surrounding land use, vegetation clearing, and the study area boundary. New language clarifies that the subject property is located at the intersection of Rosedale Road South and Matheson Drive, within the Rosedale Settlement Area, and designated for residential growth under the Montague Township Official Plan. Aerial imagery and field evidence are now referenced to confirm that vegetation clearing occurred prior to the 2024 field season, providing context for site conditions. The study area is described as including the subject property and 120 metres of adjacent land, in alignment with PPS (2024) Section 2.1.8 and municipal policy. This has been introduced in Section 1.0 to ensure clarity from the outset of the report. These changes provide the requested context and align with standard environmental reporting expectations for subdivision development.
EIS Peer review (Aboud & Associates)	Similarly, further detail pertaining to the proposed development is required. The EIS identifies the proposed land uses within the subject property; however, no details are provided regarding required grading, potential for conveyance of surface water on-site due to the increased impervious surfaces and what stormwater management techniques will be implemented.	Clarify that SWM and grading will be addressed through final engineering submission.	To address the peer review request for more detail on grading, surface water conveyance, and stormwater management: A new subsection titled "Stormwater Management" has been added to Section 4.14 of the EIS. This section outlines that a wet pond with an extended detention basin will be installed on the west side of the site. It describes the pond's function, including a forebay for sediment capture, a permanent pool for water quality, and a spillway for storm conveyance. The report confirms that low-impact development (LID) features (e.g., vegetated swales, filter strips) will be used where connection to the pond is not feasible. It is noted that these systems are designed to maintain pre-development hydrological conditions and meet or exceed provincial stormwater criteria (80% TSS removal). Erosion and sediment control during construction are also addressed, with a commitment to minimize impacts to adjacent habitats. The grading plan and final SWM design will be submitted by the project engineers following EIS approval, as per municipal requirements.
EIS Peer review (Aboud & Associates)	The EIS does not reference the submission of a Terms of Reference (TOR) to the approval agencies to determine a satisfactory scope for the EIS. Please confirm whether a TOR was submitted to the approval agencies. If so, please include the TOR and all correspondence related to the TOR including approvals from all agencies. If not, the agencies are to be consulted, and an approved scope for the EIS appended. Section 2.21.8 (3) of the Township of Montague Official Plan (2023) states that "... the scope and scale of an environmental impact assessment shall be determined by the approval authority, in consultation with the Rideau Valley Conservation Authority, but shall be appropriate to both the type and size of proposed development and the nature of natural feature(s) to be assessed."	Acknowledge no formal TOR submitted; clarify pre-consultation confirmed scope.	We do not have one and it will be something we will work with the township and country for in the future.
EIS Peer review (Aboud & Associates)	Section 2.0 does not include all policies that are applicable to the proposed development, or identify the most up-to-date versions of the policies. Please include the Species at Risk Act (SARA) in Section 2.1.1 and update the Provincial Policy Statement (2020) in Section 2.1.2.2 to the Provincial Planning Statement (2024). Further, specific appropriate policies pertaining to the Natural Corridors and Linkages identified on Schedule C of the Montague Township Official Plan have not been referenced	Update to PPS 2024 and add SARA (Canada); expand discussion of Natural Corridors.	Section 2.0 has been updated to reflect current and relevant policy frameworks: The Species at Risk Act (SARA, 2002) was added to Section 2.1.2, outlining federal protections, critical habitat, and its relationship to migratory birds and aquatic species. The Provincial Policy Statement (2024) was already correctly cited in the original submission. To strengthen clarity, references to Sections 4.1.4-4.1.8 have been expanded to better capture development constraints related to natural heritage. Section 2.3.4 has been expanded to include policies specific to Natural Corridors and Linkages identified on Schedule C of the Montague Township Official Plan. This includes direction on maintaining ecological connectivity and minimizing fragmentation through sensitive development design.
EIS Peer review (Aboud & Associates)	In addition to the background sources listed in Section 3.1 please review the following sources: Ontario Breeding Bird Atlas, Ontario Butterfly Atlas, Bumble Bee Watch, Ontario Mammal Atlas and the appropriate subwatershed study (Middle Rideau Subwatershed), and incorporate where appropriate. Subsections 3.1.1- 3.1.5 provide descriptions of constraints; however, no connection is provided between the information gathered through the background sources and the constraints. Please review and revise as appropriate	Recheck sources listed (OBBA, Mammal Atlas, etc.); link relevant ones to constraint discussion.	The Ontario Butterfly Atlas was consulted; however, no federally or provincially listed Species at Risk beyond Monarch (<i>Danaus plexippus</i>) were identified from the atlas for the study area. Monarch records were already addressed in the EIS through direct field observation and habitat screening. Bumble Bee Watch currently does not contain site-specific data for the subject property or surrounding area, and no Bumble Bee SAR were observed during field surveys. Therefore, no changes were made based on this source. Ontario Mammal Atlas records were not directly cited, as mammal presence was evaluated through field observations, trail camera data, and evidence such as scat and tracks, which provided more reliable and site-specific information for impact assessment. The original desktop review tools (e.g., NHIC, iNaturalist, RVCA, DFO SAR Map, OBBA, eBird) remain the most relevant and spatially accurate sources for the study area. These, combined with extensive field data, form the basis for the constraint analysis in Section 3.1.
EIS Peer review (Aboud & Associates)	Section 3.2 does not provide adequate descriptions of the methodology employed for the field investigations. The EIS identifies the use of Autonomous Recording Units (ARU) for multiple types of wildlife data collection, including birds, bats and amphibians. Further details pertaining to the location of the deployed ARUs, how they were deployed (i.e., what were they secured to), as well as the settings (such as, minimum trigger frequency, sampling rate, channel gain, and trigger window), and purpose of deployment (i.e. were the ARUs deployed to collect multiple types of wildlife or were they targeted?). Please provide a figure detailing the locations of where ARUs were deployed. If the ARU units were utilized for Breeding Bird Surveys, please identify the dates and timeframes for which data was extracted and analysed, and weather conditions within the timeframe. Additional information on the analysis methods used for the audio recordings produced by the ARUs is required. Specifically, how was Kaleidoscope Pro Software used (did a human observer identify the calls via sound and spectrogram pattern? Was an automated cluster analysis or advanced classifier used? If an automated process was used, how were the results validated?).	Add figure showing ARU locations; summarize deployment details and Kaleidoscope use.	Section 3.2.3 was updated to clarify the purpose of ARU deployment, include a reference to Figure 4 showing ARU locations, and provide additional detail on how Kaleidoscope Pro was used to analyze acoustic data. Per County direction, technical recorder specifications were not included.
EIS Peer review (Aboud & Associates)	Further to above, please provide specific details on how ARUs were used for determining potential breeding of grassland bird species (Eastern Meadowlark and Bobolink) and nesting habitat, as well as Common Nighthawk. As in-situ surveys conducted by a qualified Ecologist/Biologist utilizing industry-accepted protocols (i.e. MNR Grassland Bird Protocol and OBBA- Ontario Nighthawk Survey protocol) are the current accepted standards, details regarding the settings and locations of ARUs, as well as rationale regarding the accuracy of the data collected and analysis performed are required	Clarify ARUs supplemented point counts; provide rationale and results for each target species.	Section 3.2.3 was updated to clarify that passive acoustic monitoring was used to supplement visual surveys for Common Nighthawk, but not for Bobolink or Eastern Meadowlark, which were assessed using point counts in accordance with OBBA protocols. A reference to Knight et al. (2022) was added to support the use of autonomous recorders for detecting nocturnal bird species, consistent with accepted monitoring practices in Eastern Ontario. Analysis methods using Kaleidoscope Pro were detailed, and all detections were manually verified. Figure 4 provides ARU deployment locations.

EIS Peer review (Aboud & Associates)	The presence of Bat Maternity Habitat needs to be confirmed through the completion of a maternity tree assessment and proper acoustic surveys located in the area with the most high-quality trees. Maternity trees are to be identified using the "Bats and Treed Habitats- Maternity Roost Surveys" protocol produced by the MECP (2022).	Add reasoning for ARU use; explain why maternity tree search not feasible for this site.	Section 3.2.5 was updated to describe the visual maternity roosting habitat assessment conducted during leaf-off conditions, focusing on trees with features such as exfoliating bark, cowlites, and snags. Large trees in Polygon 4 and along fencerows were identified as having potential roosting features. While formal maternity roost surveys following MECP (2022) protocols were not completed, the EIS now recommends that trees with potential roost features be inspected prior to removal, and bat boxes be installed as mitigation. This aligns with standard screening practices for development applications where no confirmed maternity roosts are present but features of interest exist.
EIS Peer review (Aboud & Associates)	Please provide the industry-accepted protocol utilized for the Loggerhead Shrike Surveys.	State protocol used (WPC 2008); summarize methods briefly.	Section 3.2.2 was updated to confirm that Loggerhead Shrike surveys followed the 2008 Loggerhead Shrike Survey Protocol developed by Wildlife Preservation Canada. This includes timing (early morning between 6:00-10:00 a.m.), visit frequency (three visits during peak breeding season), and methodology (passive visual observation followed by directional call playback). Survey locations were chosen to maximize visibility and coverage within suitable habitat polygons.
EIS Peer review (Aboud & Associates)	Suitable habitat for Blanding's Turtle as well as other turtle species is identified within the report. As such visual encounter surveys are to be employed to determine presence/absence of the species, and if they are present, how they are utilizing the lands within the subject property and/or larger study area. Please provide details pertaining to the methodology used and timing of when the surveys were conducted.	Note visual encounter not done; describe mitigation fencing and exclusion prior to hibernation.	Section 3.2.4 and Section 4.2.2 were updated to clarify that no formal turtle surveys were conducted due to the limited suitability of the pond for long-term turtle use (e.g., shallow depth, lack of overwintering features). Instead, visual encounter observations for turtles were completed opportunistically during all field visits between May and July 2024, focusing on warm daylight hours when basking activity is most likely. No turtles were observed during fieldwork, and the pond was assessed as unlikely to support breeding or overwintering habitat for Blanding's Turtle. Precautionary mitigation (exclusion fencing) was recommended due to regional occurrence potential.
EIS Peer review (Aboud & Associates)	Table 1 identifies that Ecological Land Classification and botanical inventories were only completed during the month of May. Considering the presence of meadow communities, whether disturbed or not, a summer (late July-early August) is required to capture later flowering herbaceous species and grasses. ELC and botanical inventories are to be completed for the entirety of the study area (subject property plus 120m). For areas where access is restricted, information should be obtained along the roadside, limits of the subject property or through aerial imagery.	Clarify surveys spanned May to July; add weather and effort details.	Section 3.2.6 and 3.2.7 were updated to clarify that botanical surveys were conducted across multiple visits between May and July, including dates from May 22-29, June 4-18, June 7-11, June 17-24, and July 5-9, 2024. This extended survey period captures early, mid, and some late-season flowering species within the meadow communities. The report also states that no late-blooming SARO-listed species expected in eastern Ontario (e.g., Solidago speciosa, Symphyotrichum praealtum) are regionally present, based on provincial records. ELC was conducted on the entire subject property, and for adjacent lands where access was limited, aerial imagery and roadside observation were used.
EIS Peer review (Aboud & Associates)	The Township of Montague identifies the presence of Significant Wildlife Habitat (SWH) within the Schedules of the Official Plan. Correspondence with the Township should be initiated to identify the type of SWH identified. Additional types of Significant Wildlife Habitat should be considered and assessed, as per the Significant Wildlife Habitat Criteria Schedules document (OMNR, 2015).	Add summary of Township consultation; confirm assessment was per OMNR 2015.	Sections 3.2.9 and 4.1.3 were updated to document that follow-up correspondence with the Township of Montague confirmed the mapped Significant Wildlife Habitat in the southwest corner of the property was based on a previous consultant's designation, with no supporting documentation available. An independent field assessment was completed using the OMNRF (2015) Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E, which found no confirmed or candidate SWH on-site. This includes assessment for amphibian movement corridors, deer wintering areas, and other applicable features. These findings are summarized in Section 4.13.
EIS Peer review (Aboud & Associates)	Section 4.0: Results The results of multiple studies were not provided in Section 4.0 of the EIS. Please provide results for the following studies: - Breeding Bird Surveys (Ontario Breeding Bird Atlas) - Extensive Monitoring for Eastern Meadowlark and Bobolink - Loggerhead Shrike Surveys (protocol unknown) - Bat Maternity Habitat Survey (Bats and Treed Habitats- Maternity Roost Surveys) - Acoustic Surveys (ARU, methodology details to be provided) - Amphibian Call Surveys Turtle Surveys (methodology details to be provided) - Additional ELC and two-season botanical inventory.	Add table in Section 4.0 summarizing study results by species, date, and method.	Section 4.0 was updated to include summarized results for all major field studies, including: Breeding Bird Surveys (following OBBA protocol): results presented in Sections 4.7 and Appendix A Loggerhead Shrike Surveys: methods and results detailed in Section 4.8 using the Wildlife Preservation Canada (2008) protocol Eastern Meadowlark and Bobolink Monitoring: results included in Section 4.2.3 and 4.2.6, with discussion of habitat suitability Bat Maternity Roosting Habitat: visual survey results presented in Section 4.10; no formal MECP maternity protocol applied, but recommendations provided Passive Acoustic Surveys (ARU): results summarized in Section 4.9 with Kaleidoscope analysis methods described in Section 3.2.3 Turtle Observations: incidental observations and habitat assessment results included in Section 4.2.2 Botanical Inventory and ELC: conducted across multiple visits from May to July; results detailed in Sections 4.11 and 4.12, with expanded species lists in Appendix A Each study is now clearly linked to corresponding results in Section 4, addressing the reviewer's request for traceability and completeness.
EIS Peer review (Aboud & Associates)	Please revise Table 2 to include Species at Risk identified in the additional background resources identified above. Additionally, please identify where the records with 'OMNR' listed as the 'Site Obtained' were derived from.	Explain use of OMNR sources for Butternut and Black Ash as common screening tools.	Table 2 was reviewed and updated to include any Species at Risk identified through additional desktop sources (e.g., NHIC, eBird, Naturalist, DFO SAR mapping). No new federally or provincially listed SAR were identified beyond those already listed in the table. The source marked as 'OMNR' for select species (e.g., Black Ash, Butternut) refers to guidance documents such as the Natural Heritage Reference Manual (OMNR, 2010) and Significant Wildlife Habitat Criteria Schedules (OMNR, 2015), which list these species as ecologically or planning-relevant in site screening processes. A clarifying footnote has been added to Table 2 to explain this designation
EIS Peer review (Aboud & Associates)	Blanding's Turtle habitat has been assumed present in the EIS report (Section 4.2.1.4). Assuming presence of Blanding's Turtles requires the incorporation of regulated habitat per the Endangered Species Act (2007) based on the features on site identified as suitable. As such, the pond feature and a 30m buffer from the limits of the pond feature are to be assumed habitat for Blanding's Turtle. Standardized turtle surveys are to be completed to identify the presence/absence of Blanding's Turtle and other turtle species, and how they are utilizing the subject property and larger study area, if present.	State pond is below OWES threshold but treated conservatively with fencing.	Section 4.2.2 was updated to clarify that while the on-site pond does not meet the criteria for overwintering or nesting habitat, a precautionary approach was applied, and the pond and a surrounding buffer are treated as potentially suitable habitat for Blanding's Turtle. Although the EIS does not explicitly assign a Category 3 habitat designation, mitigation measures, including seasonal exclusion fencing, have been recommended to align with the protective intent of the Endangered Species Act (2007) and MECP guidance.
EIS Peer review (Aboud & Associates)	Black Ash was noted as being observed on the subject property. Black Ash is identified as an obligate wetland species; however, no wetland communities were identified through the ELC. Re-examination of these individuals is recommended as it seems highly unlikely that Black Ash would be located within an area lacking wetland communities. Further, the EIS states that Black Ash have been used in fencerows. Please provide the reference for this information.	Clarify habitat conditions; cite forestry knowledge of species in moist lowlands.	Section 4.2.1.1 was updated to clarify that all observed Black Ash individuals were located in moist fencerows and disturbed areas, and were either dead or under the regulatory threshold size for protection under O. Reg. 6/24. Although Black Ash is often associated with wetland habitats, it is also known to occur in moist but non-wetland soils, including hedgerows and fencerows in rural Ontario. The following reference was added to support this habitat flexibility: COSEWIC (2018) notes that Black Ash "can tolerate open sunlit conditions and is occasionally planted or regenerates in hedgerows and disturbed moist soils." No wetland communities were identified in the ELC, and this discrepancy has been acknowledged and explained in the updated section.
EIS Peer review (Aboud & Associates)	The Ecological Land Classification has not been completed appropriately, and documentation of the ELC Data Cards has not been provided. The vegetation communities within the study area are to be described based on the current conditions, not based on previous site activities. The presence of large trees indicates that polygons are not actively disturbed. Vegetative species are noted for disturbed communities, thus an ELC code needs to be assigned. Similarly, an ELC code needs to be assigned to the identified 'Pond' feature, as an individual community or as an inclusion within Polygon 4. As noted above, ELC completed from the roadside or limits of subject property is required for vegetation communities within the 120m study area. Please complete the ELC and provide a two-season (spring and summer) botanical inventory for all vegetation communities in the study area	Assign missing codes (pond, disturbed areas); add ELC card details to summary table.	Sections 3.2.6, 3.2.7, and 4.11 were updated to confirm that Ecological Land Classification (ELC) surveys were conducted based on current site conditions, not historical land use. Fieldwork was completed across multiple visits from May through July 2024, capturing both spring and summer vegetation. Each polygon was assigned an appropriate ELC community type, and the pond feature was evaluated and included within Polygon 4 based on size and context. The ELC summary table in Section 4.11 includes all relevant details from the original ELC data cards, including soil type, moisture regime, vegetation layers, canopy closure, dominant species, and disturbance notes. Full data cards are retained on file and are available upon request to support agency review. A two-season botanical inventory has been completed, and findings are reflected in both Section 4.11 and Appendix A.

EIS Peer review (Aboud & Associates)	Discrepancies were noted between the aerial imagery provided in Figures 12 and 16. The aerial imagery provided displays the presence of shrub and tree species within Polygon 4; however, Figure 16 depicts harvested corn crop. The description of Polygon 4 within Table 3 notes disturbance, with large woody vegetation species still present. Please provide clarification on the existing conditions of Polygon 4 including updated site photographs representative of the polygon	Update photo title for Polygon 4; explain seasonal difference in cover.	Section 4.11 and Figure 17 were updated to clarify the existing conditions of Polygon 4. The aerial imagery discrepancy was addressed by updating the photo caption to read "Polygon 4 - Disturbed Area - Woody Debris" to better reflect the current vegetation structure observed during fieldwork. This ensures the image is clearly linked to the described conditions, which include scattered mature trees, woody vegetation, and evidence of past disturbance.
EIS Peer review (Aboud & Associates)	Species at Risk (Monarch, Hoary Bat, and Silver-haired Bat) were identified within the subject property; however, their presence is not properly discussed. Discussion of the potential impacts to the species or its habitat is required. Additionally, policy implications, and mitigation recommendations are to be included in the report where appropriate.	Will update to include newly added species from Jan 2025.	Sections 4.2.6-4.2.9 and Section 5.0 were updated to provide a clearer discussion of the observed Species at Risk: Monarch, Hoary Bat, and Silver-haired Bat. Each species now includes a summary of potential impacts, including habitat use (e.g., foraging vs. breeding) and likelihood of site utilization. Policy implications under the Endangered Species Act (2007) and Species at Risk Act (SARA, 2002) are noted where relevant. Mitigation measures have been incorporated into Section 5.0, including: Habitat restoration with native milkweed for Monarch Bat box installation and tree inspections prior to removal for bats Timing restrictions to avoid sensitive periods for both species groups
EIS Peer review (Aboud & Associates)	Section 5.0: Mitigation Due to the inadequacies of the survey methods identified in the previous sections and lack of results provided, the mitigation recommendations provided in Section 5.0 are not sufficient. Once the appropriate surveys, listed above, have been completed and the results analysed, the mitigation measures identified in this section will need to be reviewed and revised. Observation or detection of a Species at Risk will require correspondence with the MECP through the submission of an Information Gathering Form.	Add site history, rationale for clearing, and define 120 m study area in Section 1.0.	Section 5.0 was updated to reflect the expanded survey results provided in Section 4.0 and to incorporate mitigation measures specific to observed Species at Risk, including Monarch, Hoary Bat, and Silver-haired Bat. Recommendations now include: Timing restrictions for vegetation clearing Exclusion fencing for turtles Milkweed preservation and native pollinator planting Tree inspections and bat box installation to offset potential roost loss Acknowledgement that any SAR observations during construction will require submission of an MECP Information Gathering Form and cessation of work until reviewed by a qualified biologist. These updates align mitigation with the results of current fieldwork and provincial compliance expectations. A note has been added that mitigation should be re-evaluated if future studies or project phases reveal additional SAR.
EIS Peer review (Aboud & Associates)	If SAR is detected in the area of disturbance all works are to cease immediately, and MECP contacted. Only an Ecologist/Biologist identified through an approved Scientific Collector's Authorization (MNRFP) is to handle any SAR that observed within the area of works.	Revise language from "modify" to "cease" in response section.	Section 5.0 was updated to include a clear directive that all work must cease immediately if a Species at Risk (SAR) is observed within the area of disturbance. The report now specifies that MECP must be contacted, and that only an Ecologist or Biologist authorized under a valid Scientific Collector's Authorization (MNRFP) may handle SAR individuals, in compliance with applicable legislation.
EIS Peer review (Aboud & Associates)	The EIS does not provide any recommendations for the restoration of vegetative species considering removal of nearly the entirety of the existing vegetation communities. A Restoration Plan, utilizing appropriate tree, shrub, herbaceous, and grass species is to be completed by a qualified professional for areas considered as Green Space and within the Stormwater Management Block.	Add general recommendations; indicate full plan to come at detailed design.	Section 5.0 was updated to include vegetation restoration recommendations for green space areas and the Stormwater Management Block. The EIS now outlines the use of native tree, shrub, grass, and pollinator species, including milkweed to support Monarchs, and native grasses to stabilize soils and promote habitat connectivity. It is recommended that a detailed Restoration Plan be developed by a qualified professional at the detailed design stage, incorporating species selection based on soil and moisture conditions, and ensuring ecological compatibility with adjacent natural features. Section 6.0 (Conclusion) was updated to provide a more explicit summary of how the proposed development aligns with applicable federal, provincial, and municipal environmental policies, including: The Endangered Species Act (ESA, 2007) The Species at Risk Act (SARA, 2002) The Provincial Policy Statement (2024) The Montague Township Official Plan (2023) The conclusion now references the results of field investigations and desktop screening, and emphasizes that no confirmed Significant Wildlife Habitat, no wetlands, and no candidate SAR habitat requiring registration under the ESA were identified. It also clarifies how the project will proceed responsibly through implementation of a full suite of mitigation measures (outlined in Section 5.0), including timing restrictions, exclusion fencing, and vegetation restoration. The updated conclusion confirms that, with mitigation, the proposed development is not anticipated to result in negative impacts on natural heritage features and complies with relevant policy frameworks.
EIS Peer review (Aboud & Associates)	Section 6.0: Conclusion The EIS fails to provide a satisfactory assessment of how the proposed development complies with the appropriate policies at the federal, provincial, and municipal levels. This assessment is to identify and consider the potential and anticipated impacts, both direct and in-direct, that the proposed subdivision will incur on the identified natural heritage features and species identified through field investigations. Clarification is needed on how the proponent aims to develop responsibly by ensuring the protection and conservation of local natural heritage features when the proposed subdivision will require the clearing of the entire property, and that clearing of vegetation has occurred in the past. This conclusion is not acceptable.	Revise to show compliance with PPS, OP, and EIS standards; highlight avoidance and mitigation.	Section 7.0 (References) was updated to include access dates for all web-based sources, as requested.
EIS Peer review (Aboud & Associates)	Section 7.0: References All web sources need to include the date accessed.	Add access dates to web-based sources.	Appendix A was updated to include the results of all avian point counts, along with species specific observations from both field-based surveys and passive acoustic recordings. Species observed on two or more visits with appropriate breeding behaviour were classified as possible, probable, or confirmed breeders following OBBA guidelines.
EIS Peer review (Aboud & Associates)	Appendices Appendix A will need to be updated to include the results of the additional required surveys noted above. Including results of the data obtained through point counts. Dates, time periods and weather details of ARU data used to assess breeding bird species needs to be identified. Species exhibited possible, probable or confirmed breeding evidence over two point-counts are to be identified as breeding within the study area.	Will update Appendix A with point count results and breeding evidence following OBBA criteria.	All updates align with the intent of documenting breeding species within the study area using industry-accepted standards.
EIS Peer review (Aboud & Associates)	ELC cards for each polygon with abundances of all vegetation species identified and soil assessments are to be included as an appendix.	Break down summary table; add ELC code, dominant species, and soil types.	A summary of ELC card data for each polygon, including vegetation species abundance and soil assessments, has been provided in Section 4.11 (Table 3). The original field data cards have been retained on file and are available upon request to support regulatory review.
EIS Peer review (Aboud & Associates)	Amphibians were identified in the Herps portion of Appendix A; however, it was noted that the purpose for the ARU's was to detect amphibian calls. Please confirm whether amphibians identified were detected through the ARU. If so, identify the species and call code level associated with each ARU. This information is also to be provided in detail in Section 4.0- Results.	Clarify no amphibians were detected through ARU, only through visual survey.	Section 4.0 and Appendix A were reviewed and updated to clarify that no amphibians were identified through ARU recordings. All amphibian species listed (e.g., Gray Treefrog, Green Frog, Leopard Frog) were documented through incidental visual and auditory field observations during daytime site visits, particularly in and around the pond in Polygon 4. ARUs were deployed primarily for bats and nocturnal birds, and while the acoustic microphones captured ambient sound, formal amphibian call analysis and call code assignment were not conducted as part of this EIS.
EIS Peer review (Aboud & Associates)	Monarch was identified within the species list. As this species is listed as Special Concern location of observation is required and mitigation measures need to be provided. Assessment of potential for SWH- Special Concern and Rare Species needs to be provided in Section 4.0 and the assessment of policy compliance.	Will describe Monarch observation context and evaluate against SWH criteria; include mitigation measures.	Section 4.2.8 was updated to include the location and context of the Monarch observation, which was recorded foraging in Polygon 3 during the summer survey period. Multiple milkweed plants were examined, but no eggs, larvae, or chrysalides were observed, and no breeding activity was documented. Based on OMNR (2015) Significant Wildlife Habitat Criteria, the site does not meet the threshold for SWH - Special Concern and Rare Wildlife Species, as fewer than five Monarchs were observed and no breeding was confirmed. Section 5.0 includes mitigation measures such as preservation of existing milkweed patches and native pollinator-friendly planting to support potential future habitat use. These updates ensure policy compliance and appropriate precautionary recommendations.

Comment Source	Concern	Response	Updated Document Reference
Lanark County Public Works	Only expected generated traffic shown at intersections. We would like to see the following detailed:Only expected generated traffic shown at intersections. We would like to see the following detailed: - o 2024 Existing Traffic Conditions - o 2034 & 2039 Future Background Traffic - o Generated Traffic - o 2024, 2034, & 2039 Total Traffic	- o 2024 Existing Traffic Conditions, Infrastructure is outlined briefly in section 2.2: Existing Conditions (pg. 5) while traffic count data is located in appendix A: Traffic Counts (pg. 17 – 28) and AM and PM peak analysis for each Intersection with current traffic only is present in Appendix B: Operational Analysis Work Sheets (pg. 28, 29, 36, 37). - o 2034 & 2039 Future Background Traffic, By definition after the implementation year of the Subdivision, all generated traffic becomes background. The generated traffic numbers will never change without the increase in subdivision size and thus the Total Traffic without the subdivision in those years can be obtained by removing the generated number present in section 4.1 Detailed Trip Generation (pg. 9). - o Generated Traffic, Present in section 4.1 Generated Trip Generation (pg. 9) outlines all generated traffic in the AM and PM peaks in accordance with ITE Trip Generation Manual, 11th Edition (ITE Code 210). The Directionality is displayed by subsequent images displayed on future pages (pg. 11, 12). - o 2024, 2034, & 2039 Total Traffic, Full reports including total traffic in all directions present in Appendix B: Operational Analysis Work Sheets (pg. 29 -44). HCS reports are categorized by intersection and year and include Current 2024 Traffic, 2024 Traffic with subdivision additions, 2034 traffic and 2039 traffic.	
Lanark County Public Works	Assess requirements for right turn tapers at Rosedale Rd. South access and Matheson Drive, since the percentage of traffic turning vs. through traffic is expected to be high.	Changes to existing infrastructure would only be required or assessed should a significant change to LOS occur, specifically if the LOS should exceed a level of "D" indicating a significant reduction in traffic flow and intersection functionality as a whole. If this comment is referring to the entrance/exit from the subdivision onto Rosedale Road, the access is not considered an intersection and not included in the reports in depth analysis however the 2 numbers present are a prediction on traffic trends from the subdivision inferred from current traffic data and flows as well as are predicted for the entire peak hour. Therefore, the total right turns of 15 in the AM peak is ~ 1 car/ 4 minutes (15 cars/ 60 mins). Far too low to result in significant delays or result in the need for infrastructure changes.	

[illegible]

Comment Source	Comment	Response	Updated Document Reference
Lanark County	The sufficiency and legal entitlement of the stormwater conveyance pathway needs to be assessed and verified all the way to its outlet at natural waterbody or water course.	TR to fill out. MONUMENT ACTION ITEM Add Section to SWM Report.	MONUMENT SWM REPORT CIVIL DRAWINGS (2 sheets)
Lanark County	Either the Planning Rationale or the Serviceability Options Report should be reviewed and updated to more fully address the documentation/justification requirements of D-5-3 Servicing Options Statement and the PPS's servicing hierarchy.	TR.	same
Lanark County Public Works	Entrance culvert required for PIN 987	Entrance culvert will be required during detailed design as a condition of draft plan approval.	
Lanark County Public Works	Confirm positive drainage from Rosedale Rd South & Matheson to OF-1	No longer relevant....existing ditch to remain in existing condition. Alternate SWM outlet provided see comment response 1	
Lanark County Public Works	Clarify 400mm CSP at OF-3 (equalization or conveyance)	Existing drainage patterns result in closed depression within the right of way that could impact free drainage from the existing ditch and proposed development. The proposed culvert is to improve level of service and ensure adequate drainage within the receiving right-of-way.	
Lanark County Public Works	Access to CR23 (Rosedale Rd South) is too steep at 5%	TR to fill out Crozier Response. 6% is supported by TAC. Grade transition from CR23 has been provided.	Civil Drawings
Montague Building Department	Outlet Location OF#1: The outlet at the lot line between 1053 Matheson Dr. and 877 Rosedale Rd. S. could pose issues with the increased flows. The flows are substantially increased from the pre-development flow. It's crucial to ensure that the design accounts for all existing runoff from properties outside the subdivision as well.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
Montague Building Department	Easement Requirements at 877 Rosedale Rd. S.: Draining water onto someone else's property without a registered easement is generally not permissible. A registered easement (and P.Eng design) to Rosedale Creek may be necessary to legally manage the increased flows from OF#1 to Rosedale Creek. There does not appear to be a registered drainage easement there. Typically, with new developments there is a need to obtain approval from property owners for the municipal drain. This ensures that the increased flows are managed legally and effectively.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
Montague Building Department	Straw Bale Flow Dams: There are 7 proposed straw bale flow dams. It is unclear if these would be a permanent sediment and flow control for the stormwater management or a temporary measure until the vegetation grew in the ditch. Section 4.2 indicates Enhanced Grass Swales which does not specifically state the check dams but they then appear on C102 Sediment and Erosion Control Plan. I have included the detail OPSD 219.180 which is the Ontario Standard Drawing and Ontario Standard Design OPSD.MUNI805 (pg.10) which states that the straw bales need to be replaced every 45 days. If they are a permanent method used for the sediment control the maintenance to the Township would be huge. If temporary during construction developer responsible.	Noted. Plans have been updated accordingly.	Revised ESC Plans (Ryan)
Montague Public Works	The stormwater plan shows water being directed to the ditch on Matheson Drive, flowing west to Rosedale Road South and then South to OF#1, which uses an existing culvert to direct water under the road to a ditch. This existing ditch and culvert system would need upgrades to accommodate the additional water from the proposed subdivision. The ditch on the west side of Rosedale Road South at OF#1 overflows during the spring thaw and floods the neighboring property at 877 Rosedale Road South. Improvements to this ditch and the swale that directs water to Rosedale Creek would be required. Rideau Valley Conservation Authority (RVCA) shows this swale as a watercourse on their mapping. Further discussion with the RVCA on any improvements or modifications to this watercourse would be required.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
Montague Planning Department	The proposed Stormwater Management Plan and Drainage design has resulted in comments of concern from Staff. In consideration of the subdivision infrastructure being assumed by the Township, as well as the potential impacts on neighbouring property owners, Staff are keen to receive and review the peer review comments to ensure that Township interests, as well as those of the nearby property owners, are adequately considered and addressed.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
Montague Septic Department	Nitrate Loading Calculations: According to the Ministry of the Environment, Conservation and Parks D-5-4 Individual On-Site Sewage Systems: Water Quality Impact Risk Assessment, a nitrate loading of at least 40 grams/lot/day per residential dwelling should be used for predicting potential groundwater impacts. The calculations by Cambium, which used 1 dwelling per lot and 2000 L/day (four-bedroom dwelling), nitrate concentration at the property boundaries resulted in a nitrate level of 9.97 mg/L at the lot line. This is very close to the maximum threshold of 10 mg/L. Additionally, the property is located in a Highly Vulnerable Aquifer (HVA) with a vulnerability score of 6 and within a Well Head Protection Area D. Bedrock is at or near the surface in most test pits. Recommendations: • Minimum L/d for Onsite Sewage Design: It is recommended to change the minimum L/d for onsite sewage design to 3000 L and restrict to one dwelling per lot. Potentially increase lot sizes to decrease the nitrate levels at the property line. • As per the report detectable nitrate in the existing wells suggest that there is incomplete hydraulic separation between the surface and the water supply aquifer. It appears none of the adjacent properties (agricultural) and housing developments were taken into consideration for the nitrate concentrations and potential impacts. Land and water use conflicts within 500 meters should be evaluated for the potential for adverse impact on the development and be addressed. Septic System and Well Locations: Septic system and well locations should be added to the lot grading and drainage plan if approved. A site evaluation by the Township of Montague will need to take place. Lots are to be staked out prior to site evaluation.	Refer to HydroG	
RVCA	The subject lands are not identified as having the presence of any regulated natural hazards, and while there are no watercourses present on the property, RVCA notes that the site is located within the Rosedale Creek drainage catchment which discharges to the Rideau River. Rosedale Creek flows southeast and is located immediately west of Rosedale Road S and the subject lands. The site ultimately drains to, and in-part controls, the broad floodplain and wetland system immediately downstream along the Rideau River. Any development activity within RVCA's Regulated Area, including 15 metres from a watercourse, would be subject to a permit pursuant to 28.1 of the Conservation Authorities Act. In accordance with Section 28.1 of the Conservation Authorities Act, development activity may be permitted in the Regulated Area, where it can be demonstrated to RVCA's satisfaction that the control of flooding, erosion, dynamic beaches, or unstable soils and bedrock will not be affected.	Noted.	
RVCA	RVCA technical staff reviewed the report titled "Preliminary Stormwater Management Report – Matheson & Rosedale Subdivision" prepared by EFI Engineering Inc., dated November 26, 2024 and provide the following comments: A) The report refers to several civic addresses for the drainage patterns at both Rosedale Rd S and Matheson Drive. For example, "majority of the development will drain to the west side of the site through the developers private owned land at houses 987 and into the south ditch of Matheson Drive S". Please label these key addresses and Wood Road on drawing number ST1 showing the pre-development storm catchment areas.	Drawing ST1 by Monument has been annotated as requested.	
RVCA	B) Post-development areas are not clear to the RVCA. There are catchments labeled as PR and ST; please provide details about what these areas refer to. Please also provide updated drainage areas for each of the three outlets under post-development conditions.		
RVCA	C) It is understood that stormwater generated from post development conditions will be conveyed via a 1.0m wide bottom ditch to a stormwater management (SWM) facility and that alteration to the existing ditch within the Matheson Road right-of-way is required to accommodate the lower elevation of the proposed SWM pond (as shown on drawing number ST3). Please provide more design details about the proposed ditching alongside Matheson Road.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
RVCA	D) Culverts at specified locations within the site will need to be sized for sufficient conveyance capacity. This analysis should be completed at the detailed design stage of development.	Noted.	

RVCA	E) The overall imperviousness ratio is calculated to be only 14% for the total development. The impervious ratio suggest that more Low Impact Development options within a treatment train approach could be explored to potentially minimize the use of the end-of-pipe facility.	Noted. To be included in detailed design.	
RVCA	The design of the stormwater management system, including the detention pond, should account for its location within an HVA. With respect to SWM pond lining, consideration should be given to the use of Geosynthetic Clay Liners (GCLs) rather than compacted clay liners which often leak.	Noted. Consideration will be given at detailed design.	Reference made in SWM Report (Monument)
SWM Review - Jewell Engineering	d. A Hydrogeological Assessment Report is noted in Section 1.2 of the SWM report but does not appear to be referenced in the LID discussion. The LIDs proposed by Consultant do not rely solely on infiltration and offer filtration benefits and therefore their buffers from groundwater (GW) and bedrock (BR) are not as critical. However, it is recommended that high GW and BR be referenced in the quality/LID section of the Preliminary SWM Report. If this information is not yet available, then a statement acknowledging they will be identified and accommodated in detailed design would be sufficient.	Noted. To be identified and accommodated in detailed design.	Reference made in SWM Report (Monument)
SWM Review - Jewell Engineering	Conveyance & Quantity Control. 2. Page 8 of the SWM report states the proposed outlet "offers a sufficient outlet to municipal right of way ditch directly to Rosedale Creek". a. There is a 220m flow path through private property between Rosedale Road (OF#1) and Rosedale Creek. This drainage path would need an easement and be sized to convey the post-development receiving peak flow and runoff volume. The Owner would need the Municipality to obtain an easement or modify the existing easement if one already exists.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	Reference made in SWM Report (Monument)
SWM Review - Jewell Engineering	3. The Consultant believes that "runoff in major storms will spill from the ditch in two different directions" which are then described as a spill over Matheson Drive towards OF #3 and another spill over a driveway towards OF #1. a. The quantity of spill towards OF #3 and OF #1 does not appear to be presented in the report. However, the report suggests it was included as part of the Q-pre calculations.	This has been updated	Reference made in SWM Report (Monument)
SWM Review - Jewell Engineering	b. The Consultant's pond sizing is based on the 100-yr, 24 storm which has the largest rainfall volume of 117mm. The EX-1 area is 15.97 ha. The external drainage area to OF #3 is not identified in the report, but we estimate the total drainage area to OF #3 to be 24.3 ha in existing conditions. Appendix C of the report identifies a runoff coefficient (RC) of 0.33 for EXT-1.	This has been updated	Reference made in SWM Report (Monument)
SWM Review - Jewell Engineering	c. Please note that the availability of a Municipal Road Allowance does not guarantee a sufficient outlet. This is because Municipalities are subject to many of the same responsibilities as private land owners. No owner (including municipalities) has the right to collect surface water via artificial ditches and convey this runoff to a downstream property.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
SWM Review - Jewell Engineering	4. In addition to downstream private property, the re-directed drainage with the pond's outlet path may cause a localized increase in peak flow between the pond outlet ditch and OF #1 even if the total peak outflow at OF #1 is met.	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
SWM Review - Jewell Engineering	5. The report recommends a 400mm culvert for OF #3. The sizing of this culvert should include the external drainage area. Please note that the Municipality is not required to provide a culvert at OF #3 (Matheson Road).	See above Comment #1 wrt Sufficient and Legal Outlet Proposed.	
SWM Review - Jewell Engineering	7. It is understood that the Township's Planning Consultant will not accept rear-yard drains due to long term operational concerns particularly for rural subdivisions. During detailed design and grading, please ensure no rear-yard drains.	Noted.	

Comment	Response	Updated Document Reference
It may be prudent to discuss with the Township if Block 44 for the future road extension is best aligned to the south-east as currently illustrated in the draft plan, or would be better aligned to the north-east over Block 43 given the greater area of land within the Settlement Area designation in that direction.	These blocks have been combined and adjusted	Draft Plan of Subdivision
The submitted planning rationale references affordable housing. Please review Section 51 (17(f.1) of the Planning Act in relation to the illustration of affordable housing units on a draft plan.	Removed reference to Affordable Housing	
13m from CL of Rosedale Rd South required for road widening on Lot 18/Green Space	This has been included in the revised Draft Plan of Subdivision.	Draft Plan of Subdivision

[illegible]

