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Our ref: 12662580

05 March 2026

Saverio Montemarano
Bromont Homes
60 Saramia Crescent, Unit 7
Concord, Ontario L4K 4J7

Millbrook Subdivision, 963 County Road 10, Part Lot 13, Concession 6, Township of Cavan Monaghan, County of Peterborough
Environmental Impact Study
Response to Otonabee Conservation Review Comments

Dear Mr. Montemarano,

GHD Limited has prepared the following responses to the review of our Environmental Impact Study (dated December 13, 2025) by Otonabee Region Conservation Authority (ORCA), for the first submission of the draft plan of subdivision for the property located at 963 County Road 10, Millbrook in the Township of Cavan Monaghan, known as Fallis North. GHD completed a Natural Heritage Constraints Letter (July 2025) and an Environmental Impact Study (EIS; August 2025). The comments received from ORCA were comprehensive and have been organized as per the order of their comments in their letter with GHD responses below.

ORCA Comment #1:

Floodplain

The subject property is traversed by Baxter Creek and its associated valley feature. Within this valley lies the floodplain. Otonabee Conservation has regulatory floodplain mapping (WSP, 2022) that defines the floodplain associated with Baxter Creek as it traverses the site. It is noted that the proponent provided an independent model to determine the floodplain extents associated with the creek as part of the application submission. Comments regarding the floodplain delineation and the effects of the development on upstream properties are found in Appendix B and are required to be addressed in a second submission.

GHD Response: To be addressed by engineers.

ORCA Comment #2:

Erosion Hazards

During pre-consultation an assessment of the erosion hazard limit was requested to confirm that the draft plan will be located outside of the erosion hazard. This delineation has not yet been provided. Given the presence of the valley feature and erosion risk associated with the watercourse, this assessment is necessary to ensure the risk of the hazard has been adequately identified and the draft plan drawn accordingly. See Appendix B for guidance on completing this assessment.

GHD Response: To be addressed by engineers.

ORCA Comment #3:

There is a conflict in he studies submitted studies by GHD as it relates to the presence or absence of a wetland associated with the Baxter Creek tributary and valley feature along Aquatic Habitat Zone 1 (EIS – GHD, August 2025). The constraints letter (GHD, July 2025) reports the presence of a wetland where the EIS does not. Please note that setbacks at this location are being provided for the watercourse, the hazards (erosion hazard yet to be determined) and an aquatic habitat zone setback of 30 metres. Further, the development limit shown on the Draft Plan demonstrates that any potential wetland associated with the riparian zone of the creek will be sufficiently protected from adjacent development interference (Biglieri, July 2, 2025).

GHD Response: The Natural Environment Constraints Report dated June 9, 2025 by GHD adopted a conservative approach with respect to the identification and delineation of wetlands and associated boundaries. The constraints mapping exercise was undertaken to flag potential wetland-related concerns at an early stage based on preliminary site investigations in the spring (April 28th and May 20th 2025) before vegetation was established. As part of the Environmental Impact Statement (EIS) scope of summer field work, additional detailed Ecological Land Classification (ELC) field investigations and OWES based wetland boundary assessments were subsequently conducted to accurately determine wetland boundary line, and confirm wetland status where applicable within the peak growing season. Findings from the EIS study phase indicate that, due to site slope and vegetative composition in 2025, the feature does not meet the regulatory definition of a wetland and is more appropriately characterized as riparian vegetation. The vegetation was dominated by greater than 50% upland species, such as Canada goldenrod. The area on both sides of the creek wetted perimeter did contain some riparian goldenrod and grass species.

ORCA Comment #4:

The 'Street A' watercrossing and grading extents as proposed will encroach substantially into the valleylands. The 'Development Limits' are misleading on the Draft Plan given this encroachment. A future site visit is recommended with Otonabee Conservation staff to inspect this area as it relates to this proposed watercrossing for the purposes of informing potential design requirements/alternatives, wetland compensation requirements (if any), and draft plan conditions regarding same.

GHD Response: A site visit can be arranged with GHD biologists and the team engineer of the Site and the creek crossing prior to the detailed design stage. As noted in the EIS, any alteration to Habitat Zone 1 with construction of the road/servicing crossing will likely require the submission of a Request for Review (RFR) to be submitted to the Department of Fisheries and Oceans for compliance with federal Fisheries Act. As well as design and permitting requirements under the Otonabee Conservation Regulations.

ORCA Comment #5:

MAM2-2 & MAM2-10

These features have developed due to lack of agricultural use and hydrologically, they are a function of the existing drainage patterns associated with the headwater drainage features (HDF-1 & 2). These features are slated for removal as part of this plan. Otonabee Conservation notes that compensation, as discussed in the EIS is likely not feasible on the lands south of Fallis Line. That developments wetland compensation has already advanced to the detailed design phase and there is likely a lack of available candidate area not already vegetated or part of an existing natural heritage feature setback available. Hydrologic offsetting will be required to be undertaken at the site via the use of Low Impact Development best management practices and enhanced infiltration methods in combination with stormwater management best practices.

GHD Response: We agree that LID best practices and enhanced infiltration methods and stormwater management best practices should be utilized by the design team in the detailed design to maintain downstream hydrological functions. GHD will work with the engineers and client on these designs for submission.

ORCA Comment #6:

It will be recommended that an enhanced planting plan for native species be submitted at the detail design stage that would have the effect of enhancing ecologic/hydrologic function of those lands proposed to remain zoned Natural Linkage, inclusive of side slopes of any grading encroachment of those areas (i.e. watercrossing).

GHD Response: A detailed planting plan for native species would be completed by a landscape architect as a condition of draft approval. GHD can aid in the selection of native tree, shrub and seed mixes in the creek buffer, stormwater pond and any other lands outside the development envelope.

ORCA Comment #7:

As referenced above, the site is traversed by a number of headwater drainage features and associated wetland. Upon review of the technical reports, including the Natural Environment Constraints Letter and the Environmental Impact Study submitted by GHD, Otonabee Conservation notes that the headwater features identified as HDF-1A, 1B, 2A, 2B, 2C and 2D are not regulated watercourses as per the definition of a watercourse under Ontario Regulation 41/24. The wetlands delineated on the updated figure by GHD (dated August 6, 2025) include MAM2-2 (6,222 m2 to be removed) and MAM2-10 (1114 m2 to be removed) are regulated features and permits will be required to complete the removals. The removals will result in a "change or interference" and is subject to Policy 7.0 (3) of the Watershed Planning & Regulations Policy & Procedures manual (ORCA, 2025). A combination of stormwater management best practices including appropriate volume controls, low impact development and infiltration will be required to offset hydrologic function, flood storage and attenuation.

GHD Response: It is understood that a permit under Regulation 41/24 will be required for changes and interference to those features, and for creation of LID and infiltration measures at detailed design. Removal of Wetlands MAM2-2 and MAM2-10 will be part of that permit submitted to ORCA by the client.

If you require additional information, please contact us.

Regards

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