August 15, 2025

Town of Caledon
Planning & Development Department
6311 Old Church Road
Caledon, ON
L7C 1J6

Attention: Tanjot Bal, MCIP, RPP, Senior Planner, Planning & Development Department

RE: **Draft Plan of Subdivision (21T-24004C) & Zoning By-law Amendment (RZ 2024-0019) Formal Resubmission**
12519 and 12713 Humber Station Rd.
Owner: PROLOGIS CANADA HOLDING 3 GP ULC

Dear Ms. Bal,

Kindly accept this cover letter containing our development team's responses to the C*onsolidated Comment Letter*, dated May 12, 2025, for the first submission of the Draft Plan of Subdivision and Zoning By-law Amendment Applications.

The following reports and drawings have been updated/ prepared to support the second formal submission ('Submission 2'):

- Draft Plan of Subdivision (including AutoCAD file)
- Draft Zoning By-law Amendment and Draft 'Schedule A'
- Planning Justification Report
- Civil Engineering Drawings (including Pre-Post Development Drainage Plan, Sanitary Drainage Plan, Stormwater Servicing Table, Sanitary Servicing Table, Servicing Plans, Grading Plans, SWM Details, Interim SWM Pond Design/ Details and TRCA SWM Outlet Letter, Municipal and Provincial Standards, Erosion and Sediment Control Plans and Details, and Construction Management Plan)
- Civil Engineering Cost Estimate
- George Bolton Parkway Detailed Design Drawings
- O&M Manuals for the On-Site Stormwater Management Tanks and the Interim Stormwater Management Pond
- Channel Realignment Detailed Design Drawings (including Civil Engineering Drawing Set, Detailed Design Brief, Wetland Relocation Design Drawings, HEC-RAS Model, and Hydraulic Analysis Report)
- Supplemental Geotechnical Investigation and Recommendations
- Hydrogeological Assessment Report
- Architectural Plans (including site plan, floor plan, roof plan, and elevations)
- Urban Design Brief
- Landscape Plans
- Landscape Cost Estimate for the Building Area and the Channel Realignment Area
- Arborist Report and Tree Inventory Plans
- Stage 2 and 3 Archeological Assessment Ministry Acceptance Letters
- Environmental Impact Study
- Woodland Environmental Management Plan
- Functional Servicing Report
- Noise Impact Study
- Green Development Standard Energy Model Report
- Hydrogeological Assessment
- Stormwater Management Report
- Traffic Impact Study

All the reports and drawings submitted to support the application have been coordinated to maintain consistency between all materials submitted with the Humber Station Employment Area Secondary Plan (OPA 287) and associated CESIMP Reports.

COMMENT #	COMMENT	MAINLINE RESPONSE
1.0 URBAN DESIGN		
1.1	An Urban Design Brief is still outstanding under the Site Plan Application.	Included with this submission is the Urban Design Brief.
1.2	Enhanced landscape treatments are required along Street A. Ensure there is adequate space within the landscape strip to accommodate a. Where parking areas are visible from the street, buffer landscaping and architectural screening features shall be provided, such as tree planting, berming, low walls, decorative fencing and/or hedging TWDG 11.2.3c	Several planting beds have been added along Street A.
1.3	Please review SPA 2024-0100 for further detailed comments	This is acknowledged and understood.
2.0 ACCESSIBILITY		
2.1	Please review SPA 2024-0100 for accessibility comments	This is acknowledged and understood.
3.0 FINANCE		
3.1	If the proposed application were to proceed as planned (creation of 3 employment blocks, a road (extension of George Bolton Parkway) and reserve blocks) on the property, the taxable assessment value of the property will change, to reflect any development that will take place.	It is understood that the taxable assessment value of the property will change to reflect the proposed development that will take place.
3.2	Under current By-laws of the Town and other charging entities, any new, added, or regularized buildings will attract Development Charges (DC) at the Non-Residential (Industrial) rates in effect on the date of building permit issuance. Development Charges will be 'frozen' at the rates that will be in effect on the date when the first of either site plan or zoning By-law amendment application is deemed complete (the application completion date), provided that the application took place after January 1, 2020. Otherwise, Development Charges will be determined on the date of building permit issuance.	It is understood that Development Charges will be calculated at the Non-Residential (Industrial) rate in accordance with the Development Charges By-law.
3.3	If 'frozen' rates apply, interest on Development Charges will accrue for the period starting one day after the application completion date, through to the date on which the charges are received by the Town.	It is understood that interest on Development Charges will accrue for the period starting one day after the notice of complete application.
3.4	Currently, applicable Development Charges for buildings at the Non-Residential (Industrial) rates are: a. Town of Caledon: $112.91 per m² of new or added industrial floor space. b. Region of Peel: $226.19 per m² of new or added industrial floor space. c. Education: $11.84 per m² of new or added industrial floor space.	Thank you for clarifying the current Development Charges.

COMMENT #	COMMENT	MAINLINE RESPONSE
3.5	For the purposes of Development Charges, the term 'industrial floor space' should comply with the definition of an 'industrial building', as outlined in the Town's By-laws No. 2024-042 and No. 2024-043. If compliance is not met, then the Non-Residential (Other) rates will apply.	This is acknowledged and understood.
3.6	Development Charges are indexed twice a year, February 1st and August 1st.	Thank you for clarifying that Development Charges are indexed twice a year.
3.7	The Development Charges comments and estimates above are as at January 17, 2025 and are based upon information provided to the Town by the applicant, current By-laws in effect and current rates, which are indexed twice a year. For site plan or rezoning applications dated on or after January 1, 2020, Development Charges are calculated at rates applicable on the date when an application is determined to be complete (the application completion date); and are payable at the time of building permit issuance. That determination of rates is valid for 18 months after application approval date. Interest charges will apply for affected applications. For applications other than site plan or rezoning applications; and site plan or rezoning applications dated prior to January 1, 2020, Development Charges are calculated and payable at building permit issuance date. Development Charge by-laws and rates are subject to change. Further, proposed developments may change from the current proposal to the building permit stage. Any estimates provided will be updated based on changes in actual information related to the construction as provided in the building permit application.	Thank you for clarifying the important details of how Development Charges will be calculated.
4.0 PARKS DEPARTMENT		
4.1	A payment of money in lieu of conveyance of parkland will be required for the development land in accordance to the Planning Act and the Town's Parkland Dedication By-law -2022-042 or any successor thereof.	It is understood that cash-in-lieu of parkland dedication will be required for this application.
4.2	A Financial Parkland Agreement will be prepared between the Humber Station Employment Area Landowner Group. The calculation and dedication of the parkland contribution requirements will be calculated on behalf of the Owners on a collective basis based on the Humber Station Employment Area as a whole and not on the individual Owners' Lands.	It is understood that Financial Parkland Agreement will be prepared between the Humber Station Employment Area Landowner Group.
4.3	Owner shall provide a Certificate Letter from the Trustee to confirm that the owner of the subject lands has contributed to the Trustee its share of the parkland dedication and parkland cash-in-lieu payment to be made by the Humber Station Employment Area Landowner Group.	As a condition of Draft Plan Approval, the Owner will submit a Certificate Letter from the Trustee confirming the Owner has contributed their share of the cash-in-lieu of parkland dedication.

COMMENT #	COMMENT	MAINLINE RESPONSE
5.0 LANDSCAPE		
5.1	Provide the following materials for review and comments a. Landscape Architect Letter of Conformance b. Arborist Report c. Tree Preservation Plan and Tree compensation d. Landscape designs, compensation and restoration requirements shall meet the recommendations provided in the final approved reports for the Humber Station Employment Area Secondary Plan and the Draft Plan of Subdivision e. Green Development Standards Checklist (Draft Plan of Subdivision)	Please find submitted, and prepared for SPA-2024-0100, all of the requested materials.
5.2	All lands to be conveyed to the Town will be reviewed as part of the subdivision 21T-24014C Detailed Design Submission. The subdivision drawings, cost estimates, and reports shall be organized into separate, independent set.	It is understood that lands to be conveyed to the municipality will be reviewed separately.
5.3	Refer to Town's Terms of Reference for Arborist Reports, Tree Preservation Plans and Tableland Tree Removal Compensation for the requirements on Arborist Report and Tree preservation contents.	Thank you for providing the Town's Terms of Reference for landscaping matters.
6.0 MUNICIPAL NUMBERS		
6.1	The property address is confirmed as 12519 & 12713 Humber Station Road	Thank you for confirming the property addresses.
6.2	Should the application be approved, the existing municipal address will cease to exist, and new municipal numbers shall be issued in accordance with the Municipal Numbering By-law and Guidelines. These numbers will be issued in accordance with these documents, based on approved driveway locations and a new street name.	It is understood that through application approval, new building addresses will be issued based on approved driveway locations.
6.3	Municipal numbers will be issued at the earliest of grading approval, servicing approval or Final Site Plan Approval.	Thank you for the clarification.
6.4	Upon issuance of Final Site Plan Approval, the Lead Planner will forward a copy of the approval package to municipal numbering staff to work with the owner to issue the required numbers and post any required signage of the numbers in accordance with the Town's Municipal Numbering By-law and Guidelines.	Thank you for confirming the process to obtain new building addresses. Building addresses will be affixed the building/pylon signs and approved via building permit submission process.
6.5	There are no concerns with the proposed Zoning By-law Amendment	Thank you for confirming that there are no concerns with the proposed Zoning By-law Amendment.
7.0 HERITAGE DEPARTMENT		
7.1	**Heritage Register** The subject lands include the following listed, non-designated properties included on the Town of Caledon's Heritage Register: a. 12713 Humber Station Road b. 12519 Humber Station Road	Correct, these are the current addresses for the subject property.

COMMENT #	COMMENT	MAINLINE RESPONSE
7.2	At one time, these properties contained historic farmsteads with 19th century Italianate style farmhouses and associated outbuildings.	Thank you for the information, this is understood.
7.3	The farmhouse at 12713 Humber Station Road was demolished prior to July 2009. The remaining built heritage resources on these properties were demolished between 2018-2019 without the Town's knowledge.	The current Owner of the subject lands purchased the properties in 2022.
7.4	**Archaeological Assessment** The proponent provided the following archaeological assessment as part of the application submission: a. "Stage 1 Archaeological Assessment for Eight Properties of Participating Landowners Within the Humber Station Villages Secondary Plan Area Located Between Healey Road, Coleraine Drive, Mayfield Road and Humber Station Road Within Part of Lots 1 to 6, Concession 5 In the Geographic Township of Albion Historic County of Peel Now in the Town of Caledon Regional Municipality of Peel Ontario", prepared by Archeoworks Inc., dated March 3, 2022.	This is acknowledged.
7.5	As part of the related site plan application (SPA 2024-0100), the proponent submitted the following archaeological assessment and its supplementary material: a. "Stage 2 Archaeological Assessment For Two Properties of Participating Landowners Within the Humber Station Villages Secondary Plan Area: Parcel 1 Located at 12713 Humber Station Road and Parcel 2 Located at 12519 Humber Station Road Within Part of Lots 3 and 4, Concession 5 and Stage 3 Archaeological Assessment for the Solmar H6 (AIGw-130) Site As Part of the Proposed Development of parcel 1 (12713 Humber Station Road) Within Part of Lot 4, Concession 5 All in the Geographic Township of Albion Historic County of Peel Now in the Town of Caledon Regional Municipality of peel Ontario.", prepared by Archeoworks Inc., dated November 17, 2024.	This is acknowledged.
7.6	Ministry of Citizenship and Multiculturalism (MCM) compliance letters were not provided as part of this submission for either archaeological assessment.	MCM acceptance letters tied to the Stage 1AA (March 3, 2022) and Stage 2/Stage 3AA reports (November 17, 2024) are included in this submission.
7.7	Prior to draft plan approval, the applicant must submit the MCM compliance letters for the archaeological assessments referenced above.	This is acknowledged and understood. The MCM Compliance Letters are included in this submission.
7.8	Further archaeological assessment of the subject lands, including Stage 3 and Stage 4 work will be dealt with as part of the related site plan application.	Acknowledged. Outstanding Stage 3AA and Stage 4AAs are ongoing with efforts targeted for completion during the 2025 field season.

COMMENT #	COMMENT	MAINLINE RESPONSE
7.9	**Commemorative Feature** As part of Phase 2 of the development, the proponent must install, at their sole expense, a commemorative feature, including a plaque no less than 24" x 36", public art, and plantings, in an amenity space, or other suitable location as determined by the Town, within the proposed industrial development. The plaque must summarize the history of the properties and their cultural heritage resources.	This is acknowledged and understood. Through the second phase of development site planning, a commemorative feature will be designed and submitted for the Town's approval.
7.10	The location and details of the commemorative feature must be included on landscape drawings as part of the site plan application for Phase 2, to the satisfaction of Town Heritage and Landscape staff.	This is acknowledged and understood. The commemorative feature will be coordinated between the heritage consultant and the landscape architect and will be submitted through the second phase of development site planning process.
8.0 MMAH		
8.1	MMAH defers comments regarding the Highway 413 Focused Analysis Area and the NWGTA Transmission Corridor Narrowed Area of Interest to the Ministry of Transportation and the Ministry of Energy and Electrification, respectively.	This is acknowledged and understood.
9.0 MINISTRY OF ENERGY		
9.1	Thank you for including the Ministry of Energy and Electrification in future circulations.	The Town of Caledon will circulate the Ministry of Energy on all future circulations.
9.2	The subject lands at 12519 Humber Station Road are partially within the Northwest Greater Toronto Area Transmission Corridor Identification Study's 2020 Narrowed Area of Interest. Current mapping for the Corridor Study can be found here: https://data.ontario.ca/dataset/northwest-greater-toronto-area-transmission-corridor-study-area.	It is understood that the southern extent of 12519 Humber Station Road is partially within the Northwest Greater Toronto Area Transmission Corridor Identification Study's 2020 Narrowed Area of Interest.
9.3	At this time, the Ministry of Energy and Electrification is unable to allow any development to proceed within the Narrowed Area of Interest as it could be impacted by the future transmission corridor.	Please note that no development is contemplated within the Narrowed Area of Interest. Included with this submission is a Draft Plan of Subdivision and Site Plan that clarifies that no development is occurring in the Narrowed Area of Interest.
9.4	The Ministry of Energy and Electrification and Independent Electricity System Operator continue to work with the Ministry of Transportation to co-locate the transmission corridor as refinements are being made to the Highway 413 transportation corridor.	Thank you for providing this information.

COMMENT #	COMMENT	MAINLINE RESPONSE
10.0 ENBRIDGE		
10.1	38. Refer to comments or conditions provided under application SPA 2024-0100, DART 21T-24004C, RZ 2024-0019.	Thank you, comments are received through SPA 2024-0100.
11.0 BELL CANADA		
11.1	We have reviewed the circulation regarding the above noted application(s) and have no objections to the application(s) at this time. However, we hereby advise the Owner to contact Bell Canada at planninganddevelopment@bell.ca during detailed design to confirm the provisioning of communication/telecommunication infrastructure needed to service the development.	Thank you for confirming that Bell Canada has no objections to this development application.
11.2	**Bell Canada Condition(s) of Approval** We would also ask that the following paragraph be included as a condition of approval: a. The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost. It shall be noted that it is the responsibility of the Owner to provide entrance/service duct(s) from Bell Canada's existing network infrastructure to service this development. In the event that no such network infrastructure exists, in accordance with the Bell Canada Act, the Owner may be required to pay for the extension of such network infrastructure. If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.	Thank you for outlining the condition of Draft Plan Approval.
12.0 ZONING		
12.1	**RZ 2024-0032 Zoning Comments:** Zoning notes that the Entrance Width on the southernmost entrance of Block 1 has been measured at 17.09 metres along "Street A", whereas the By-law permits a maximum Entrance Width of 12.5 metres. This has been added to the Draft By-law special standards. Please see Draft By-law for more information.	The included site plan has been updated and now shows a maximum driveway entrance width of 16.78m. A provision has been added to our Draft Zoning By-law to request 17.0m entrance width.
12.2	Zoning notes that Building Height appears to comply with the Zoning provisions of the MP-XXX Zone; however, Finished Grade, as defined in Town of Caledon Zoning By-law 2006-50, has not been provided on the submitted Elevation Drawings. Finished Grade will be required on the Elevation Plans in order to determine Building Height compliance. i. Finished Grade means the average surface elevation at the outside walls of any building or structure, which is determined by taking the arithmetic mean of the levels of the finished ground surface at every location of change of grade at the outside walls of the building or structure.	Proposed Building Elevations have been updated with annotation for Finished Grade.

COMMENT #	COMMENT	MAINLINE RESPONSE
12.3	Applicant to review Section 5.2.18 “Illumination” and confirm compliance.	Please find included with this submission the Photometric Site Plan and can confirm its compliance to section 5.2.18.
12.4	Zoning notes that the associated Schedule “A” has not been provided for review.	Please find included with this submission Schedule A.
12.5	Please see the draft by-law comments provided. Any future copies of the draft by-law must be in Microsoft Word format (no PDF to Word conversions). Tracked changes are recommended but not required. "Added to the Draft By-law as the maximum Entrance Width has been measured at 17.09m on the southern most entrance along “Street A”, whereas the By-law permits a maximum Entrance Width of 12.5 metres."	Thank you for providing notes with respect to the draft zoning by-law. Note that a provision has been added to our Draft Zoning By-law to request a 17.0m entrance width.
12.6	**21T-24014C Zoning Comments:** Zoning notes that the Draft Plan of Subdivision dated April 2024, indicates a proposed Serviced Industrial (MS) Zone, whereas the associated files RZ 2024-0032 and SPA 2024-0100 have indicated a proposed Prestige Industrial – Exception XXX Zone (MP-XXX). Applicant to please clarify which Zone is proposed.	Please note that the Draft Plan of Subdivision and the Draft Zoning By-law Amendment have been coordinated to request rezoning to Prestige Industrial.
12.7	Zoning notes the Prestige Industrial – Exception XXX (MP-XXX), as proposed under associated file RZ 2024-0032, and the Serviced Industrial (MS) Zone contain the same Zoning requirements for minimum Lot Area (925m2) and minimum Lot Frontage (30m). It appears that all proposed Blocks will comply with these Zoning requirements; however, clarification is needed regarding Comment #1 above.	Thank you for clarifying compliance.
12.8	Final lot frontages and lot areas to be confirmed at a later date when a Certificate of Lot Area and Lot Frontage has been prepared and signed by an Ontario Land Surveyor (see Condition #2 below).	The necessary Certificates prepared by the project OLS will be submitted to satisfy conditions of draft plan approval.
12.9	Zoning standards such as parking space requirements and dimensions, building height, encroachments, building setbacks, landscaping areas, building areas, entrance setbacks, driveway widths etc. have not been reviewed at this stage. Staff acknowledges that this may be deferred to the technical review stage. Compliance with these requirements cannot be determined at this time.	It is acknowledged and understood that all performance standards have not been reviewed at this time.
12.10	Please note the following conditions for draft approval of the subdivision requested by zoning staff: Prior to registration, a Zoning By-law for the development of these lands is to be passed under Section 34 of the Planning Act, R.S.O. 1990, c.P.13, as amended, and be in full force and effect.	It is understood that the Zoning By-law must be in full force and effect prior to registration of the subdivision.
12.11	Prior to registration, the Owner shall provide a Certificate of Lot Area and Lot Frontage prepared and signed by an Ontario Land Surveyor, to the satisfaction of the Town of Caledon.	The necessary Certificates prepared by the project OLS will be submitted to satisfy conditions of draft plan approval.

COMMENT #	COMMENT	MAINLINE RESPONSE
13.0 REGION OF PEEL		
13.1	**Development Engineering:** Functional Servicing The Region has reviewed the Functional Servicing Report prepared by C.F. Crosier & Associates Inc., dated November 2024, and offer the following comments:	Crozier: Noted.
13.2	Municipal Watermain: The development is located within Region Water Pressure Zone 6. The watermain infrastructure consists of existing 200mm dia. watermain on Humber Station Road and future 400mm dia. watermain on Humber Station Road with construction completion date of approx. spring 2026.	Crozier: Noted.
13.3	There is a provision in the Region's budget for 400mm watermain on Street A to be extended in the future towards George Bolton Parkway.	Crozier: Noted.
13.4	The watermain system should be designed to provide adequate fire flow for Buildings. Please provide calculation methodology for the proposed 30,000 L/min fire flow for Building 1.	Please find included in this submission the Calculations prepared by Superior Sprinkler.
13.5	Preliminary modelling shows that 400mm water main connected across George Bolton Parkway will likely be required to supply the require fire flow, to be confirmed once the calculation is updated.	Please find included in this submission the Calculations prepared by Superior Sprinkler.
13.6	The high required fire flow (RFF) is a limitation. The RFF, which Peel calculated to be 108,000 L/min (1,800 L/s) for Building 1 cannot be supplied even with a 400mm connection crossing the GBP extension. The RFF in the FSR of 23,000 L/min (383L/s) can be supplied by a 400mm watermain on Street A, with or without a connection crossing the GBP extension. The applicant needs to confirm their RFF.	Please find included in this submission the Calculations prepared by Superior Sprinkler.
13.7	Street A is within the Developer's property and should be designed and constructed with the overall subdivision. Until Street A is dedicated as right of way appropriate municipal easements should be dedicated for watermain and sanitary sewer.	Please find included in this submission the detailed design drawings for Street A (future extension of George Bolton Parkway). Should an easement be required, the necessary dedications will be made.
13.8	Municipal Sanitary Sewer: The sanitary sewer infrastructure in the vicinity consists of future 750mm/1200mm diameter sanitary sewer with construction completion date of approx. spring 2026 on Humber Station Road and proposed sanitary sewer on Street A.	Crozier: Noted.
13.9	The sanitary flow calculations should be updated to use the most recent design criteria in Peel Region's 2023 Linear Wastewater Standards.	Crozier: Noted. The sanitary flow calculations have been updated per Peel Region's 2023 Linear Wastewater Standards.

<table>
<tr><th>COMMENT #</th><th>COMMENT</th><th>MAINLINE RESPONSE</th></tr>
<tr><td>13.10</td><td>Sanitary drainage area drawing for the subdivision and external lands, if applicable is required to determine the sanitary sewer size on Street A.</td><td>Detailed Sanitary Tributary drawing had been prepared and included in George Bolton Parkway (Street A) 1st detail submission. Refer to Drawing TA-2.</td></tr>
<tr><td>13.11</td><td><u>Capital Budget</u>
Servicing of this Plan will require construction of 400mm watermain which is the financial responsibility of the Region of Peel as per Development Charges By-law Policy F40-06. Should the Developer wish to proceed with the works in order to obtain clearance of the Draft Plan conditions at a time when the Region is not prepared to fund the works, then the Developer shall be required to enter into a Front-Ending Agreement prior to the construction of the works. This agreement will be subject to the Region's determination that it has or will have sufficient funds to justify entering into the Front-Ending Agreement and Regional Council approval. The following oversized watermain is included in the Five-Year Capital Budget and Forecast.</td><td rowspan="2">Please find included in this submission the detailed design drawings for Street A (future extension of George Bolton Parkway).</td></tr>
<tr><td>13.11.a</td><td><table><tr><th>Component No.</th><th>Project No.</th><th>Construction Year</th><th>Description</th></tr><tr><td>32596</td><td>26-1197</td><td>2026</td><td>400mm dia. watermain on Street A</td></tr></table></td></tr>
<tr><td>13.12</td><td><u>Development Charges</u>
The Owner acknowledges that the lands are subject to the Region's Development Charges By-law in effect from time to time. The applicable development charges shall be paid in the manner and at the times provided by this By-law.</td><td>It is understood that Development Charges will be calculated at the Non-Residential (Industrial) rate in accordance with the Development Charges By-law.</td></tr>
<tr><td>13.13</td><td>Health Planning:
Peel Public Health has implemented the Healthy Development Framework (HDF), a collection of Regional and local, context-specific tools that assess the health promoting potential of development applications. All tools in the HDF incorporate evidence-based health standards to assess the interconnected core elements of healthy design: density, service proximity, land use mix, street connectivity, streetscape characteristics and efficient parking. These health objectives are used to inform decision-makers of the health-promoting potential of the development and communicate opportunities to achieve closer alignment with the objective of healthy, complete communities within Peel.</td><td>The following comments 13.13-13.15 are not applicable as this is not a residential project.</td></tr>
</table>

COMMENT #	COMMENT	MAINLINE RESPONSE
13.14	In collaboration with the Town of Caledon, Peel Public Health has implemented policies requiring the submission of a health assessment with each development application. For future submissions/ site plans for Blocks 2 and 3, a small scale ICI HDA will be required. The tool can be found under the 'Resources' tab here: Healthy communities - peelregion.ca . https://peelregion.ca/health/healthy-living/healthy-communities	The following comments 13.13-13.15 are not applicable as this is not a residential project.
13.15	Peel Public Health continues to work closely with the Town of Caledon in the assessment of the development proposal as our participation enables us to deliver on our mandate and achieve the goals set out by Ontario's Public Health Standards and our Peel Public Health 2020-2029 Strategic Priorities of Enabling Active Living and Healthy Eating and Reducing Health-Related Impacts of Climate Change. We are committed to participating in the review of community development in Peel to ensure we promote healthy built environments.	The following comments 13.13-13.15 are not applicable as this is not a residential project.
13.16	Green Development Standards 1.4 – The tool has reached just under a silver threshold on the Street Connectivity, and Efficient Parking metrics. The Streetscape Characteristics is not applicable for a small scale development. In order to meet the silver threshold, we are asking the applicant to confirm if there is an opportunity for any of the following:	Improvements to development as recommended have been implemented as noted in architectural response
13.17	Provide preferential parking for car pool or car share vehicles. Preferred parking for these vehicles is provided by incorporating signage and/or pavement markings.	Provision for carpool parking spaces has been identified on architectural site plan
13.18	Efficient use of parking is promoted by identifying systems for sharing parking spaces by two or more user groups at different times of the day or week (e.g., weekday use by office staff and evening/weekend use by restaurant clientele).	Not applicable as property is intended for single use not mixed-use development
13.19	*Confirm that parking numbers adhere to the parking requirements within the local zoning bylaw, or consider a reduction in parking.	The proposed development meets the criteria for parking requirements within zoning by-law
13.20	1.6 - As confirmed, the intent of this section is for residential uses, so it wouldn't apply to a commercial use.	Agreed, thanks for confirming that this is not applicable given the application is for industrial uses.
14.0 TRCA		
14.1	**Ecology** 1. Drawing DPS1 should be revised to include all environmental buffers. Currently it only shows the 30 m buffer from the Clarkway Tributary along the east edge of the site. Please add all environmental buffers to the plan.	All of the necessary buffers have been added to the Draft Plan of Subdivision as coordinated with the EIS.

COMMENT #	COMMENT	MAINLINE RESPONSE
14.2	2. Please revise Figure 1 in the EIS to include the wetland adjacent to the woodland at the north boundary of the site. Also please label the PSW's as such and not as 'unevaluated'.	The Figures in the EIS have been revised.
14.3	3. The EIS and Functional Servicing Reports should include a discussion on required Feature Based Water Balances for the natural features on and immediately adjacent to the subject site.	The EIS can discuss the need for a Feature Based Water Balance and implications.
14.4	4. Figure 4 Proposed Development in the EIS should be modified to avoid encroaching into the PSW buffer. a)The buffer that is illustrated at the north end of the pond/PSW appears to be insufficient in protecting the wetland from direct and indirect impacts from the development, i.e. snow storage, dumping, litter, etc. which can affect the hydrology of the wetland. Please revise the plan so that the full 30 m buffer is preserved. b) In addition, the realigned HDF-3d channel has 2 90 degree bends which is not consistent with natural channel principles and may cause future flooding and erosion issues**.** Please revise the concept to avoid 90 degree bends. c) The plan also proposes wetland removal (0.34 ha) with compensation (0.39 ha). If this portion of the existing wetland is comprised of native wetland floral species, it is recommended that wetland relocation be considered rather than compensation. Construction delays and multiple years of monitoring may be avoided by relocating the wetland rather than compensating for it.	a) The buffer associated with the 'pond wetland' (near Humber Stn. Rd) has been adjusted to indicate a 30 m buffer. As discussed with the City and TRCA, this may change in the future with later Phases planned. b) HDF-3d channel design has been updated with a meandering bankfull channel set within larger floodplain corridor. The bankfull channel does not include 90-degree bends. c) The intent for the wetland is for it to be relocated (versus removed and compensated). This was discussed in a Design Brief submitted to TRCA in mid May 2025
14.5	**Geotechnical** 5. For the proposed channel realignment, a fluvial geomorphological study/design will need to be provided to develop and demonstrate appropriate measures to protect the realigned channel slopes in the long-term against fluvial processes.	Updated channel design and design brief includes a fluvial geomorphological study/design, outlining bankfull channel parameters, riffle-pool sequencing, hydraulically sized stone and bioengineered bank treatments.
14.6	6. As per the Architectural Plans, retaining walls are proposed around the perimeters of the Building 1. The retaining walls will need to be properly designed, and a geotechnical engineer will need to review the proposed retaining walls/grading to verify the stability of the proposed works in the long-term.	Retaining wall will be designed by a geotechnical engineer.
14.7	**Water Resources** 7. The criteria used to size the stormwater management facilities for quantity control are in accordance with the Humber Unit Flow rates. It is noted that the proposed facilities are designed to control not only 2 to 100-year design storms, but also post-development Regional peak flows, ensuring they match pre-development Regional peak flows. Please submit the digital hydrology model used for the sizing of the stormwater management strategies.	Crozier: The digital model has been included in this submission.

COMMENT #	COMMENT	MAINLINE RESPONSE
14.8	8. Table 9 of the Stormwater Management Implementation Report for Humber Station Distribution Centre, prepared by C.F. Crozier & Associates Inc. and dated November 2024, shows the calculated Curve Number (CN) values used to represent post-development catchments for Phase 1A. It appears that the calculated CN values are relatively low. Please provide the details of the calculations and explain how the listed CN values were determined.	Crozier: Updated CN values have been used in the hydrology model and details of how these values were determined in provided in the updated Stormwater Management Implementation Report and Appendix A. These updated values are more in-line with the un-calibrated values in the Humber River Hydrology model and were agreed upon through discussions with the TRCA.
14.9	9. Table 16 of the Stormwater Management Implementation Report for Humber Station Distribution Centre, prepared by C.F. Crozier & Associates Inc. and dated November 2024, shows the calculated Curve Number (CN) values used to represent post-development catchments for Phase 1B. It appears that the calculated CN values are relatively low. Please provide the details of the calculations and explain how the listed CN values were determined.	Crozier: Updated CN values have been used in the hydrology model and details of how these values were determined in provided in the update Stormwater Management Implementation Report and Appendix A. These updated values are more in-line with the un-calibrated values in the Humber River Hydrology model and discussions with the TRCA.
14.10	10. The map below illustrates the proposed modification of the straight-line watercourse to a right-angle bend. This modification has the potential to significantly impact the channel's stability, leading to erosion and sedimentation issues that will require ongoing maintenance. The sharp bend increases water velocity on the outer bank, creating higher shear stress, which can result in erosion. This scouring weakens the banks, making them more susceptible to collapse over time. In contrast, the inner bank experiences lower water velocity, leading to sediment deposition and the formation of sediment bars or shoals. Over time, sediment buildup can reduce the cross-sectional area and conveyance capacity of the watercourse, requiring continuous dredging and maintenance. To mitigate these issues, effective bank protection measures such as riprap, vegetative stabilization, or gabions are essential to prevent further erosion and ensure the stability of the bend. Please submit a plan detailing how these erosion and sedimentation concerns will be addressed during design and after implementation.	SLR: The HDF-3d channel design has been updated with a meandering bankfull channel set within a larger floodplain corridor. The bankfull channel includes a sinuous natural planform and does not include 90-degree bends. The updated channel design and design brief includes a fluvial geomorphological study/design, outlining bankfull channel parameters, riffle-pool sequencing, hydraulically sized stone and bioengineered bank treatments to mitigate erosion and ensure long term stability of the watercourse while allowing for natural sediment transport processes.

COMMENT #	COMMENT	MAINLINE RESPONSE
14.11	11. Please note that converting a straight-line watercourse to a right-angle bend also introduces flooding risks due to changes in flow dynamics. The sharp change in direction reduces the conveyance capacity, causing water to flow less efficiently, particularly during high-flow conditions. This inefficiency can result in higher water levels upstream of the bend, increasing the risk of flooding. The decreased ability to carry water may lead to overtopping or water accumulation in areas not designed to manage it, especially during storm events. To mitigate these flooding risks, careful design and continuous maintenance are crucial to ensure the watercourse remains functional under varying flow conditions. Effective flood control measures, along with regular monitoring and intervention, are necessary to address the increased risk of flooding associated with right-angle bends. Please submit a plan outlining how these flooding concerns will be addressed during the design phase and after implementation.	Crozier: Hydraulic modeling has been provided that demonstrates the channel has sufficient freeboard to protect the surrounding developments from flooding. This modeling includes increased manning's n values and contraction/expansion coefficients to represent the 90 degree bends in the channel.
14.12	12. Please provide the hydraulic analysis report along with the HEC-RAS model used for the proposed realigned channel.	Crozier: A hydraulic analysis report has been provided as part of this submission.
14.13	**Hydrogeology – Notes to applicant** 13. SWM Report Section 4.5: “Considering the site will be filled for grading, infiltration is proposed in areas with >2 m of fill, so infiltration does not rely on the native soil to achieve the water balance criteria. Best efforts of 0.7 m separation between groundwater elevation and infiltration tank bottom and 72-hour drawdown time are applied to the infiltration tank design because of the high groundwater elevation and limited roof leader inverts. See Drawing C300 Servicing Drawing and Figure 2 LID Layout for details”.	Crozier: Noted.
14.14	14. “Infiltration deficit will be completed by others for Phase 1B in the detailed design stage. Water balance measures will be provided to mitigate the infiltration deficit caused by the proposed Phase 1B development”.	Crozier: Noted.
14.15	15. Drawings C203, C205 and C206 prepared by Crozier (signed by M. Iskandar) dated November 22, 2024, indicate that engineered soil to have a minimum percolation rate of 15mm per hour with a safety factor of 2.5 will be used where infiltration facilities are proposed.	Crozier: Noted. Infiltration testing was completed by SLR and results were provided through email correspondence dated June 18, 2025. Please refer to section 4.5.1 of the SWM Report and Appendix E for details. These values, with a factor a safety of 2.5, were used to calculated the minimum footprints for the LIDs.

<table>
<tr><th>COMMENT #</th><th>COMMENT</th><th>MAINLINE RESPONSE</th></tr>
<tr><td>14.15.1</td><td>Table 20: Water Balance Tank Summary
<table><tr><th>Infiltration Tank NO.</th><th>Contributing Drainage Area (m²)</th><th>Dimensions</th><th>Provided Volume (m³)</th></tr><tr><td>Tank 1</td><td>35,806</td><td>91.4 m (L) x 12.2 m (W) x 1.06 m (H)</td><td>725</td></tr><tr><td>Tank 2</td><td>35,806</td><td>91.4 m (L) x 12.2 m (W) x 1.06 m (H)</td><td>725</td></tr><tr><td>Tank 3</td><td>47,741</td><td>149.2 m (L) x 12.2 m (W) x 1.06 m (H)</td><td>1,190</td></tr><tr><td>Total</td><td>119,353</td><td>-</td><td>2,640</td></tr></table></td><td>Crozier: Noted.</td></tr>
<tr><td>14.16</td><td>Hydrogeology – Secondary Plan Comments
16. Infiltration Rates of Fill and Native Soil
The infiltration rates of the proposed fill soil and the underlying native soil at the three infiltration tank locations must be determined. Given that the native soil in the area exhibits low conductivity, infiltrating water through the engineered fill may result in either groundwater mounding or drainage via subdrains, if provided.
Drawing C203, prepared by Crozier and dated November 22, 2024, specifies that the engineered fill soil must achieve a minimum percolation rate of 15 mm/hour with a safety factor of 2.5. Hydrogeology staff have no concerns with the placement of engineered fill achieving this percolation rate over the native soil at the proposed three sites, as outlined in Table 20 of the SWM report. However, Hydrogeology staff strongly recommend conducting infiltration tests at the proposed three locations to verify the native soil's infiltration capacity.
It does not appear that the recommendation has been implemented.</td><td>Crozier: Noted. Infiltration testing was completed by SLR and results included in the Hydrogeological Assessment dated July 31, 2025. Please refer to section 4.5.1 of the SWM Report and Appendix E for details. These values, with a factor a safety of 2.5, were used to calculated the minimum footprints for the LIDs.</td></tr>
<tr><td>14.17</td><td>17. Stormwater Infiltration at SWM Pond Sites
Section 3.2.7 of the CEISMP, dated July 2024, suggested use of potential SWM pond sites for stormwater runoff infiltration. TRCA staff do not support this approach due to concerns about groundwater contamination. It is staff understanding that permanent SWM ponds are not constructed currently. However, it remains unclear whether this recommendation is being actively considered or implemented.’</td><td>Noted. Comment to be addressed by CEISMP team.</td></tr>
<tr><td>14.18</td><td>18. Please provide a drawing that shows the proposed infiltration tanks in a cross-sectional view.</td><td>Crozier: Noted. Cross-sections will be provided in subsequent submission.</td></tr>
<tr><td colspan="3">15.0 ROGERS</td></tr>
<tr><td>15.1</td><td><u>municipal approval for the Subdivision be granted subject to the following conditions:</u>
(1) The Owner shall agree in the Subdivision Agreement to (a) permit all CRTC-licensed telecommunications companies intending to serve the Subdivision (the “Communications Service Providers”) to install their facilities within the Subdivision, and (b) provide joint trenches for such purpose.</td><td>This is acknowledged and understood. 0.9m width joint utility trench had been proposed on George Bolton Parkway. Owner is to provide permit letter for utility companies to serve the project.</td></tr>
</table>

COMMENT #	COMMENT	MAINLINE RESPONSE
15.2	(2) The Owner shall agree in the Subdivision Agreement to grant, at its own cost, all easements required by the Communications Service Providers to serve the Subdivision, and will cause the registration of all such easements on title to the property.	This is acknowledged and understood. Necessary easements will be granted at the appropriate time.
15.3	(3) The Owner shall agree in the Subdivision Agreement to coordinate construction activities with the Communications Service Providers and other utilities, and **prepare an overall composite utility plan** that shows the locations of all utility infrastructure for the Subdivision, as well as the timing and phasing of installation.	Acknowledged, composite utility plans had been prepared and included in the George Bolton Parkway 1st detail included with this submission.
15.4	(4) The Owner shall agree in the Subdivision Agreement that, if the Owner requires any existing Rogers facilities to be relocated, the Owner shall be responsible for the relocation of such facilities and provide where applicable, an easement to Rogers to accommodate the relocated facilities.	This is acknowledged and understood.
16.0 PLANNING AND DEVELOPMENT		
16.1	**Draft Plan and Rezoning Applications:** Public Meeting 1. Please ensure the 2nd submission comment matrix includes public and council comments + questions from the Public Meeting, as well as any additional public comments that may have been received before or after.	All comments have been addressed as provided to Mainline Planning in the Consolidated Comment Memo.
16.2	Draft Plan of Subdivision 2. Please ensure the draft plan is consistent with the submitted studies and related site plan approval application (i.e. realignment of the creek).	The Draft Plan of Subdivision has been coordinated with Civil Engineering Drawings (creek realignment, temp. stormwater management pond) and the EIS to ensure that all buffers have been included in the necessary blocks.
16.3	3. Planning staff will defer to Natural Heritage staff, but the natural features and associated buffers must be in a separate block and conveyed to the Town.	Block 8 in the Draft Plan of Subdivision has been updated to incorporate the necessary buffers associated with the natural heritage features and will be conveyed to the Town as a condition of Draft Plan Approval.
16.4	4. The future George Bolton Parkway Extension (block 4) is subject to review and approval by MTO. Currently, MTO has indicated they are not supportive of the current configuration as it is within close proximity to the future Hwy 413 on/off ramps.	This is understood. In the interim George Bolton Parkway alignment will be utilized as a private driveway and will be conveyed to the Town when appropriate. Discussions have been had with the MTO, the Town and the Landowner's Group to decide on the intersection design of future George Bolton Parkway.

COMMENT #	COMMENT	MAINLINE RESPONSE
16.5	Draft By-law 5. Please revise the By-law Schedule to include all EPA lands within the appropriate EPA zone. Will defer to Natural Heritage staff but the EPA1 Zone appears most appropriate.	The Draft Zoning By-law has been updated to reflect the correct EPA-1 Zone.
16.6	Traffic Impact Study 6. Please provide an addendum which clearly identifies the requested relief to parking and provides justification for the relief.	The revised development proposal includes 717 parking spaces which meets the zoning by-law requirements. As such, a parking justification is not required.
16.7	7. Please also include an analysis on the necessary truck and trailer parking for the proposed use.	A total of 356 truck trailer spaces are proposed to support the warehousing activities on-site. A review of an approved comparable industrial warehouse development reveals that provision of truck trailer spaces at a rate of 0.15 space per 100 m2 is adequate for a development of this size. This equates to a projected 218 trailer spaces. The proposed supply results in a surplus of 138 trailer spaces and is therefore sufficient to support the proposed use. The truck trailer spaces were also reviewed as part of the functional design review which concluded that all spaces could be accessed and egressed by the appropriate vehicles.
16.8	Planning Justification Report 8. Please provide an addendum to the PJR to speak to current legislation and policies (e.g. Provincial Planning Statement).	Included with this submission is a revised PJR that reflects the new Provincial Planning Statement and adopted Secondary Plan.
16.9	9. Please provide additional information on the phasing for this development from site alteration to servicing, to road construction in relationship to the George Bolton Parkway EA, to future phases).	Site Alteration is underway to prepare the site for the first phase of development (Block 1). Street A (George Bolton Parkway) will be included in an updated Site Alteration permit and construction will follow to service Block 1.

COMMENT #	COMMENT	MAINLINE RESPONSE
17.0 DEVELOPMENT ENGINEERING		
17.1	**Draft Plan Comments** 1. The Environmental Assessment (EA) for George Bolton Parkway (GBP) is still underway. The Town is waiting for clarification from the Ministry of Transportation (MTO) that the proposed location where GBP connects to Humber Station Road is acceptable. The Town is also waiting for confirmation through the EA that GBP's proposed 26.0 m right of way at Humber Station is sufficient to accommodate required turning lanes, through lanes, sidewalks, active transportation etc. Until clearance is provided by the MTO and GBP right of way width determined, the Development Engineering cannot draft approve the plan.	Noted. While the general ROW for the collector is 26m per Town standard for an industrial collector road, subject to MTO decision, the section approaching Humber Station Road is recommended to be potentially widened to for the potential 2nd left-turn lane while accommodating active transportation facilities.
17.2	2. GBP and Humber Station will require 15 x 15 m daylight triangles. Future north south street and GBP will require 7.5 m x 7.5 m daylight triangle.	The necessary daylight triangles are protected as shown on the submitted site plan.
17.3	3. Local road that connects to the southern property, as identified in the EA, needs to be included on the draft plan.	The exact alignment has yet to be determined. Once clarified, the necessary Block will be provided.
17.4	4. Will ownership of the future channel through Block 2 be retained by the developer or transferred into public ownership.	The creek realignment, contained within Block 8, will be conveyed to the Town and will be rezoned EPA-1.
17.5	5. Humber Station Road is identified as a 36.0 m ROW in the Town's Multi-Modal Transportation Plan and Future Caledon: Our Official Plan. The applicant is to dedicate land such that the right of way is 18.0 m from the centerline along the frontage of the property. This road widening is to be identified on the draft plan of subdivision.	Private lands within 18.0m of the centreline of the road allowance have been depicted on the Draft Plan of Subdivision (Blocks 9 and 10) and will be conveyed to the Town as a condition of Draft Plan Approval.

COMMENT #	COMMENT	MAINLINE RESPONSE
17.6	6. Currently Humber Station is rural road that does not support truck traffic and subject to half load season. The DC Background Study Identifies Humber Station for reconstruction prior to 2031, however a portion between Mayfield Road and Healey Road is subject to Highway 413 construction, which may impact time of its reconstruction.	The Region of Peel is proposing to install a watermain and sanitary sewer along Humber Station Road (between Mayfield Road and Healey Road) and along Healey Road (between Humber Station Road and Coleraine Drive). Based on discussions with the Region, as part of the sanitary trunk sewer project, the road is being restored to an interim condition, which will support truck loads for the next 5 years and 10 years along Humber Station Road and Healey Road, until the ultimate road widening occurs. Refer to correspondence with the Region in Appendix D of the TIS Update.
17.7	**Storm Water Management/Storm Drainage** Stormwater Management Implementation Report prepared by C. F. Crozier & Associates Inc., dated November 2024 was reviewed and the following comments are provided: 1. The Town needs to understand ownership of the interim pond. The Town's CLI ECA requires that stormwater infrastructure approved under the CLI ECA be in public ownership.	Crozier: As per discussions with Town staff, the interim SWM pond will be publicly owned with the intention that the ownership will be transferred back once the ultimate pond downstream of the development is constructed and the interim pond is decommissioned. The Town has confirmed the requirements for the pond which have been reflected on the updated Stormwater Management Plans.
17.8	2. The report should provide stormwater calculations for Street A as well as providing suggested LIDs in the right of way to achieve CLI ECA requirements.	Crozier: Please refer to the detailed design package for the George Bolton Parkway extension prepared by Schaeffers.
17.9	3. The report should provide information on how the interim pond will be constructed and provide recommendations for decommissioning rehabilitation of stormwater pond and Clarkeway Tributary.	Crozier: Details on the pond construction and decommissioning are provided in the SWM report. Please refer to Section 5.3.5 and Figure A - C607 for details.
17.10	4. Demonstrate that the future north south road will be located outside the limits of the interim pond.	Crozier: The right-of-way limits of Street A2 are shown on the Engineering plans. As shown on the plans, the future north south road will be located outside the limits of the interim pond.

COMMENT #	COMMENT	MAINLINE RESPONSE
17.11	5. The interim pond has a normal water level of 230.60 m however Palmer's Hydrogeological Assessment dated November 21, 2024, identifies the groundwater level at 231.2 masl for MW169. This appears to be the closes monitoring well near the interim pond. The consultant is to identify if the pond will require special building measures or dewatering in order for the pond to function.	A test pit investigation is planned to expose large groundwater medium to assess the need for construction dewatering or other special measures.
17.12	6. The emergency overland flow route for Street A is not identified on the drawings, however based on the original topography of the site it appears that the overland flow route will be located approximately where the access road to the interim pond is proposed. The location for the future north south local road is located further east next to the Clarkeway Tributary. The consultant is to identify how the overland flow route will reach the ultimate pond location in the future.	Crozier: Two emergency spillways from Street A are incorporated into the SWM pond design at its low points, as per Schaeffer's grading drawings dated May 30, 2025. The south spillway conveys flow to a small channel before discharging into the forebay, while the north spillway discharges directly into the forebay.
17.13	7. The lands where the interim pond outlet is proposed are not owned by the applicant or the Town. The Applicant is to demonstrate to the Town how the infrastructure will be constructed and access for operation and maintenance will be provided.	Crozier: Please refer to drawing C607 and the SWM report for details on the interim pond outlet. A legal survey will be completed to confirm and delineate the ownership of the lands where the interim pond outlet is proposed.
17.14	8. Maximum allowable slope for a stormwater pond access road is 8%.	Crozier: Noted. The slope of the pond access road has been reduced.
17.15	**Environmental Impact Study** The Environmental Impact Study prepared by Palmer, dated was reviewed and the following comments provided: 1. The report does not speak to the drainage realignment being proposed as part of the interim stormwater management pond or the impacts it may have the Clarkeway Tributary	The interim stormwater management pond will be discussed in the EIS.
17.16	2. The report does not mention the interim stormwater management proposal or provide any guidance on how the interim pond should be design, stabilized, decommissioned and the area restored.	The interim stormwater management pond will be discussed in the EIS.
17.17	3. The report is to provide recommendations for restoration of the Clarkeway Tributary once the interim stormwater management pond is decommissioned and removed.	The interim stormwater management pond will be discussed in the EIS.

COMMENT #	COMMENT	MAINLINE RESPONSE
17.18	**Road Network** 1. The **Town requires preliminary grading and serving drawings for Street A to be provided for review**. The current submission does not provide any information and Crozier's drawing C607 has a note that refers to Street A Grading and Servicing prepared by Schaeffer.	Please refer to (GBP Detailed design package - confirm application)
17.19	2. A cul-dec sac meeting Town standard is required at the terminus of GBP near Clarkeway Tributary. The entire right of way is to be dedicated to the Town. The Town will also require 0.3 m reserve around the radius of the cul-de-sac.	A temporary cul-de-sac has been provided as requested.
17.20	3. Provide a conceptual drawing that demonstrates future **GBP extending across the Clarkeway Tributary** and connecting with the current GBP terminus.	Noted. The intersection angles and centreline horizontal curve radii have been labelled on relevant drawings.
17.21	4. All intersection angles shall be in the range of 85 degrees to 95 degrees and the minimum horizontal centerline curve radius is 65 m. Ensure all centerline radii meet this standard and are labelled on the draft plan.	Noted. Intersection angles and horizontal curve radii have been labelled on relevant drawings.
17.22	**Preliminary Noise Impact Study** 1. The report is to identify any acoustical impacts and required mitigation related to Street A on the exiting residence and potential. Any noise mitigation required for the individual Lots/Blocks within the plan will be dealt with through their respective site plan application.	Included in the submission is an updated Noise Impact Study that confirms no noise mitigation measures are required for these properties. Please see Section 5, page six of the Noise Impact Study.
17.23	**Geotechnical Investigation** 1. The Geotechnical Investigation Report will be required as part of detailed engineering design that provides recommendations for construction of Street A, the temporary storm pond, north south local road, realigned channel, etc. The report should also provide recommendations for removal of the interim stormwater management pond and bring the site back to grade. A draft condition will be included to speak to this.	Included with this submission is a revised Geotechnical Investigation Report that captures the listed requirements.
17.24	**Environmental Site Assessment** 1. The Phase I Environmental Site Assessment prepared by Pinchin Ltd., dated April 28, 2022 did not identify current or historical recognized environmental conditions for the site.	The Phase 1 ESA did discuss historically recognized environmental conditions. The assessment did not identify current or historical recognized environmental conditions (RECs) for the Site, and as such, no subsurface investigation work (Phase II ESA) was recommended.
17.25	2. A Record of Site Condition will be required for all lands transferred to Town ownership.	An RSC will be submitted to the town as a condition of Draft Plan Approval.

COMMENT #	COMMENT	MAINLINE RESPONSE
18.0 TRANSPORTATION		
18.1	The Environmental Assessment (EA) for George Bolton Parkway (GBP) is ongoing. The Town is awaiting confirmation from the Ministry of Transportation (MTO) regarding the acceptability of GBP's proposed connection to Humber Station Road. Additionally, the EA must verify whether the proposed 26.0 m right-of-way at Humber Station is adequate to accommodate turning lanes, through lanes, sidewalks, and active transportation. Until the MTO provides clearance and the right-of-way width is confirmed, Staff cannot grant draft plan approval.	Noted.
18.2	The local road connecting to the southern property, as identified in the EA, must be included in the draft plan.	The exact alignment has yet to be determined. Once clarified, the necessary Block will be provided.
18.3	Barrier-free accessible parking spaces must be designed in accordance with the requirements outlined in Schedule K of the Town's Traffic By-Law 2015-058.	Proposed barrier-free accessible parking spaces are in compliance with By-Law 2015-058.
18.4	An AutoTURN analysis is required for all new intersections, access driveways, and on-site circulation.	An AutoTURN analysis has been provided for the access driveways and on-site circulation. Refer to Appendix L of the TIS Update.
18.5	All intersection angles must be between 85 and 95 degrees, with a minimum horizontal centerline curve radius of 65 m. Ensure all centerline radii comply with this standard and are clearly labeled on the draft plan.	Noted. Refer to Functional Design Review in Appendix L of the TIS Update.
18.6	Please note that a parking justification study will be required if fewer than the required parking spaces are proposed. A work plan (Terms of Reference) for the parking justification study should be circulated with Town Transportation Staff prior to starting the parking portion of the investigations.	The revised development proposal includes 717 parking spaces which meets the zoning by-law requirements. As such, a parking justification is not required.

COMMENT #	COMMENT	MAINLINE RESPONSE
18.7	The proposed transit network is currently limited to what has been identified in MMTMP. Please include the policy recommendations and provide commentary/recommendations on potential new local public transit routes: o Routes serving areas within the community o Routes connecting east-west communities. Please note that all recommendations are subject to review/approval by Brampton Transit.	According to the MMTMP, Humber Station Road, Mayfield Road, and Healey Road are identified as future transit corridors. The proposed development does not warrant the introduction of a community transit route, nor is it expected to require modifications to the existing Brampton Transit Route 41. The site will be served by the existing Brampton Transit service and future planned service on Humber Station Road. As the area continues to develop, the need for additional transit routes or services can be evaluated.
18.8	Please incorporate Active Transportation (AT) network plan highlighting the existing and proposed AT components such as trails, greenways, pedestrian connections, etc., to review the seamless connectivity within the Study Area.	An Active Transportation (AT) network plan has been prepared and included in the updated traffic study. Refer to Figure 3-6 in the TIS Update.
18.9	Kindly be aware that a Terms of Reference (TOR) was not distributed to reviewing agencies before submission. It is highly advisable to circulate a TOR prior to initial submissions in the future. This ensures a defined scope of work, aiming to minimize subsequent comments	Noted.
18.10	Town Transportation Staff defer to the Region of Peel for comments on roadways and intersections under their jurisdiction.	Noted.
19.0 NATURAL HERITAGE		
19.1	**General:** • The materials submitted are not subdivision reports and plans. As indicated in the reports and plans, they were submitted in support of the Phase 1A site plan. Further, the materials were prepared/submitted before Secondary Plan approval. The reports and plans must be revised to be consistent with the Secondary Plan reports once all comments on those supporting materials have been addressed and address all subdivision matters. Matters relevant to natural heritage include but are not necessarily limited to: o Development limits – not yet approved with related CEISMP comments to be addressed.	The CEISMP, which was prepared by GEI alongside SLR, have determined development limits that have informed the site plan design and are discussed in the submitted EIS.
19.2	o Drainage diversions – CEISMP must demonstrate no negative impacts.	CEISMP, EIS and SWM all contemplate the channelization of HDF-8 - which determine that the channelized HDF will be improved with a meandering stream and improved plantings.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.3	o Compensation wetland hydrology – outstanding comments on CEISMP to be addressed.	Relocated wetland hydrology to be addressed in updated CEISMP submission.
19.4	o Design, construction details and implementation of the woodland and wetland removals and associated compensation areas and the channel realignment. The Phase 3 CEISMP report (October 2024) indicates that the first phase of development by Prologis includes the channel realignment and Wetland Compensation Area 1; however, this was not included. It is noted that Phase 1A overlaps the existing features.	Updated channel realignment and wetland relocation designs have been developed. To be included in updated CEISMP submission.
19.5	o SWM outlet locations – while the CEISMP included an analysis of the ultimate Pond #3 outlet, the two outlets in the subdivision area (into HDF3 and the interim pond outlet) had not been determined.	Crozier: We have provided a memo demonstrating no negative impacts for the interim outlet to Clarkway Tributary, the outlets to HDF-3 follow the recommendations of the CEISMP. Please refer to the Prologis Humber Station - Temporary Stormwater Management Outlet prepared by Crozier for details.
19.6	o Implementation of all CEISMP recommendations relevant to the subdivision.	Recommendations will be implemented as per updated CEISMP submission.
19.7	• Even though the submitted materials are not subdivision reports and plans, to be helpful, comments on them have been provided below. However, note that some of the comments relate to the Phase 1A site plan rather than the subdivision. Nevertheless, the comments below should not be interpreted to constitute a full site plan review as the materials were not necessarily reviewed with that lens. It is recommended that the study team meet with staff to agree on what is necessary for a subdivision and rezoning submission.	Through meetings and preliminary submissions, the Natural Heritage department provided additional feedback which has informed this resubmission. Please review the submitted EIS, Civil Engineering, and landscape drawings for updated information regarding the channel realignment.
19.8	• The submitted reports are not consistent with respect to the phases of the subdivision. For clarity, ensure that all reports are consistent.	All reports and drawings have been coordinated to ensure consistency regarding phasing and development limits.
19.9	**FSR:** • Figure 1 is not consistent with respect to labelling and legend of sanitary/SWM pipes.	Crozier: Figure 1 has been reviewed and is consistent with storm and sanitary labeling for the Phase 1A area, however, it should be noted that Figure 1 is a high-level figure that shows servicing for both the Phase 1A and Phase 1B areas.
19.10	• The need for a SWM pipe to the existing culvert on Humber Station Rd must be demonstrated. It is preferred that the SWM outlet be located at the edge of the protected natural area with open drainage to the culvert.	Crozier: Noted. The SWM outlet has been relocated to the edge of the natural heritage feature.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.11	• It is indicated that a retaining wall is proposed along the realigned channel. The civil plans display the retaining wall up to 2.5m in height. Due to impacts from future maintenance and associated access, this is a concern from a natural heritage perspective. An alternative grading solution should be considered.	Crozier: Per email correspondence with the Town's Development Engineering department dated July 21, 2025, the Town would require an access point to the channel from a municipal right-of-way. An access road has been provided from Humber Station Road to the re-aligned creek. Refer to the channel re-alignment drawing set for additional details.
19.12	**Hydrogeological Report:** • Clarify why it is indicated that the existing pond is to be retained and re-purposed as a SWM facility. This is not supported in relation to any protected natural feature.	It is a typo from an early draft version of the report. This statement has been removed from the updated report.
19.13	• Previous work completed by Pinchin and IBI Group was identified as contributing to the site characterization and data analysis for the study. The CEISMP was not referenced. Confirm that the CEISMP formed the basis of the site characterization and data analysis for the study or revise accordingly. For example, clarify the following discrepancies: o It does not appear that the full dataset from Table C2-3 of the CEISMP was used as Table 6 is missing some of the datapoints.	All the geotechnical and hydrogeological report information from the CEISMP were utilized in the site-specific hydrogeological report. The report was reworded to acknowledge the CEISMP. All accessible monitoring wells and mini piezometers on site were inventoried and utilized for the site-specific study. Details can be found in Table 1. Table 6 only list monitoring wells.
19.14	o It is indicated that only downward gradients were found in SF5-17 when the CEISMP indicated upward gradients in the spring.	SF5-17 results in CEISMP show both down and up gradient. But SLR results show down gradient. We believe SLR results are more reasonable considering the groundwater has very weak connection with surface water.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.15	o No data from SF3-17, located proximal to the site, was reported/considered but the CEISMP indicated upward gradients.	SF3-17 results in CEISMP show both down and up gradient. Groundwater levels in the thin pipe response very slow to surface water fluctuation due to low permeability of soil (aquitard). Even after surface water has subsided, the water level in the pipe may still take time to re-calibrate, again due to the low permeability. But it does not mean go discharging into wetland. The upward gradient was just a result of the slow response of water in the thin pipe.
19.16	o It is indicated that no natural features are supported by groundwater but the CEISMP indicated seasonal discharge in the western wetland.	The hydraulic conductivity of soil range 10-7 to 10-8 m/s (aquitard). Horizontal groundwater flow is almost zero. The upward gradient observed from thin pipes are mostly the result of slow response of water in thin pipes which were inserted in aquitard. So, the conclusion of natural features supported mainly by surface water is reasonable.
19.17	• Section 2.1 does not identify/acknowledge the PSWs on/adjacent to the site identified in the CEISMP.	Section 2.1 was reworded to show PSWs.
19.18	• The water balance provided is focused on the Phase 1A lands. Further, it is indicated that maintenance of post-development infiltration must only be done as much as reasonably practical. The report must demonstrate how the finalized subdivision infiltration target from the CEISMP will be met.	The CEISMP did not indicate clearly the infiltration target for the site. But as presented in Section 4.4, the infiltration deficit will be fully mitigated, or 100% maintained pre-development infiltration.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.19	• It is indicated that, based on the groundwater data and the proposed infiltration tank inverts, 1m separation could be maintained. However, Table 6 includes groundwater levels within 1m of and above the lowest tank invert of 236.03 in BH1, MW103 and MW108 which are located in the Phase 1A area. To ensure proper function, it must be demonstrated that the infiltration tanks maintain appropriate separation from groundwater.	It is very challenging to accurately identify the groundwater table in low permeability, clay rich soils. To identify the groundwater table, a test pit investigation was done to expose the shallow soils and the groundwater table. Based on the results of this test pit study, the groundwater table was found to be much deeper than the groundwater levels (i.e., piezometric head) show in the groundwater levels recorded from the monitoring wells. Test pit investigation report will be submitted to support these conclusions.
19.20	• It is indicated that the proposed Building 1 could provide clean runoff of 110,567m3/year so the infiltration deficit will be fully compensated. This must be demonstrated through calculations (i.e., the amount of roof runoff that will actually infiltrate) for the entire subdivision. It is noted that the SWM report included calculations for the Phase 1A building.	LID calculation was added as Table 18, to show the infiltration tanks are enough to fully mitigate the infiltration deficit.
19.21	• The wetland water balance was only conducted for the Phase 1A area. It must be demonstrated how the subdivision targets will be met.	We assume the subdivision target is the infiltration target. As presented above, the pre-development infiltration will be fully maintained, so the target will be met. The building features of Phase 2A and 2B are not available at present, and therefore the post-development water balance can not be done for Phase 2A and 2A. But we are confident that the infiltration deficit for Phase 2A and 2B will be mitigated fully as the Phase 1 Development.
19.22	• It does not appear that the wetland water balance was based on the proposed development: o An assumption was made that the Building 1 roof will discharge to east and west wetland which does not align with the proposed SWM strategy.	Wetland water balance was based on wetland catchments pre- and post-development, so it is different from the site water balance.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.23	o Tables 18 and 19 included an infiltration factor of 0.0 for the Building 1 roof. Clarify how this aligns with the site water balance that indicates that Building 1 could provide clean runoff of 110,567m3/year to the infiltration tanks and the proposed SWM strategy that includes infiltration tanks and associated report that includes infiltration water balance calculations. All reports must be consistent.	LID calculation was added as Table 18, to show the variables, units, formula/equations and results of the LID analysis.
19.24	• A Thornthwaite Mather unmitigated water balance and associated discussion was provided for the east and west wetlands that includes an infiltration deficit. This is not consistent with other sections that state that the infiltration deficit will be fully compensated (see related comment above). Additionally, it is indicated that the calculated increase in runoff should be managed through the SWM plan to prevent increased runoff to the wetlands and that due to buffers and created features, no impacts to wetland hydrology is expected. A wetland water balance must assess the proposed mitigation and demonstrate no impacts. The Phase 2 CEISMP indicated that the feature-based water balance is to be completed using stormwater modelling. Revise to be consistent with the CEISMP and include all proposed mitigation.	No high-risk wetlands were identified on the site, which would necessitate the need for continuous water balance modelling. Wetland water balance shows an infiltration deficit far less than the infiltration capacity of the stormwater tanks (which will infiltrate more than the infiltration deficit from the site water balance). Also infiltrated groundwater will not end up into wetland, or very little if there is, so the reduced infiltration in the wetland catchment will not have any impact to wetland. All wetlands developed along floodplain and are supported totally by stream water. The CEISMP provided that: "The majority of the wetlands were evaluated as low risk. No surface water or ground water monitoring is required, and a non-continuous hydrological model (i.e., Thornthwaite Mather) is suitable for completing pre to post (with and without mitigation) wetland water balance analysis." Therefore, water balance with stormwater modelling is not mandatory, and the wetland catchment-based water balance in the report is in accordance with TRCA guides.
19.25	**Stormwater Management Report:** • It is indicated that the realigned channel will designed by others and will be implemented as part of the Phase 1B site plan. As indicated above, this must be done as part of the subdivision. Additionally, the existing watercourse, wetland and woodland overlap the Phase 1A development area so it could not wait for Phase 1B.	Crozier: The channel re-alignment detailed design has been completed and included in this submission. The design includes the detailed grading design and hydraulic analysis completed by Crozier.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.26	• It is inaccurately indicated that the HDFs are being removed based on the site plan. Revise to indicate that they are being removed in accordance with the CEISMP.	Crozier: The SWM Report has been updated, and the text has been revised accordingly. Refer to revised SWM report for details.
19.27	• It is proposed to drain Catchment 212 overland to Phase 1b. Clarify how erosion will be addressed while Phase 1B is undeveloped.	Crozier: Drainage from Catchment 212 has been re-directed towards Phase 1A. This are drains east to a small storm tank and ultimately to the proposed sewer on Geoge Bolton Parkway. It no longer sheet flows overland to Phase 1B so erosion in this area is no longer a concern.
19.28	• The statement that a feature-based water balance is not required for east and west wetlands is not accurate. As per the CEISMP, it must be provided using stormwater modelling.	FBWB was provided in the report for east and west wetlands. As mentioned above, the wetlands are at low risk, continuous monitoring and stormwater modelling balance analysis are not required according to TRCA guides.
19.29	• The water balance calculations in Appendix E indicate that the design storm to meet the infiltration target is 6.2mm. However, the infiltration tanks are designed based on the 20mm design storm. This appears to be a significant amount of over infiltration. The EIS must evaluate this.	SLR: LID analysis show that 5 mm catch can ensure 100% mitigation of infiltration deficit. As groundwater will not discharge into wetland, the infiltrated water will join the regional groundwater system and finally ends up in the regional sink which is Lake Ontario. Over infiltration will reduce surficial runoff, which is in general beneficial to environment. Crozier: TRCA requires 5mm of onsite retention for erosion mitigation. As we are only infiltrating clean water from the roofs, this requires 20mm of infiltration from the roof.
19.30	• The development limits at SE corner of the site where the interim SWM pond is located must be on the plans/drawings.	Crozier: The Street A2 right-of-way and the Natural Heritage System Limit have been shown in the southeast corner of the site on drawing C607.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.31	• Clarify if/how the additional interim roof storage with evaporation will affect meeting the infiltration target.	Crozier: The evaporation from the roof was a recommendation from TRCA to provide additional onsite retention during interim conditions to help mitigate erosion in Clarkway tributary. During the interim phase of development, infiltration will not occur unless there is more than 5mm of precipitation. In the interim conditions, the actual infiltration will be within 4% of the water balance target.
19.32	**EIS:** • The report acknowledges that a Terms of Reference (ToR) was not prepared for agency review prior to its submission. Many of the site investigations and analyses were duplicated relative to the CEISMP. The purpose of a subdivision EIS/EIR, as required through the pre-consultation PARC, is to build upon and implement the recommendations of the CEISMP as they relate to the subdivision. As the report was prepared to support the Phase 1A site plan, this was not done. As indicated above, the report must be revised to be consistent with and implement the CEISMP once all comments on that study have been addressed. A meeting with staff to agree on the ToR is recommended.	The EIS will be revised to be consistent with the CEISMP. Note that in some cases the CEISMP is being revised based on new information or design work undertaken by Prologis.
19.33	• It is not clear what is meant by indicating that the Humber Station Employment Area draft Secondary Plan was adopted in September 2023. The Secondary Plan has not been adopted and as stated, is still undergoing review. Revise for accuracy and to be consistent with the Secondary Plan once adopted (policies and land use plan provided are outdated).	The Policy section of the EIS has been revised to reflect the newly adopted Secondary Plan under OPA 287.
19.34	• Table 2 and the subsequent text are not consistent with respect to HDF3a. Revise for clarity.	Table 2 has been updated.
19.35	• Table 3: Not appropriate to propose revised HDF management recommendations relative to the CEISMP. Revise to be consistent and implement the CEISMP.	HDF management recommendations have been coordinated with the CEISMP.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.36	• It is indicated that Savanah Sparrow, Vesper Sparrow, Upland Sandpiper and Northern Harrier (flying over the property) were observed in the breeding bird surveys. Clarify how these observations relate to SWH criteria which indicate that breeding of two of those species constitutes SWH and where these observations occurred relative to the draft plan area - not the Phase 1A area. It appears that information from the Table in Appendix E is relevant in this regard.	Neither Upland Sandpiper (UPSA) nor Northern Harrier (NOHA) were observed in recent years by SLR on the Prologis property. GEI records of a passing NOHA are not relevant to SWH status which in this category applies to breeding birds. While UPSA was observed twice by GEI several years ago, there is no suitable habitat on the Prologis property (except potentially the small edge of the protected Clarkway tributary meadows) and as mentioned this species, has not been observed in recent years. The Vesper Sparrows and Savannah Sparrows were observed through the edges of the agricultural field. While Vesper Sparrow is less common, Savannah Sparrows are abundant throughout southern Ontario in almost any type of medium to large field (agricultural row crop, old field, grassland, pasture etc.), not just grasslands. In our professional opinion, this species should not be included in this category as it's habitat tolerance is so broad and the species so common. Also, importantly, the SWH criteria indicates that this SWH is '*Grasslands not Class 1 or 2 agricultural lands, and not being actively used for farming (i.e. no row cropping or intensive hay or livestock pasturing in the last 5 years)*'. Thus, the specified SWH habitat type is not present on the property, and Open Country Bird Breeding Habitat SWH is not present.

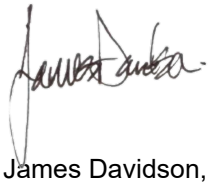
COMMENT #	COMMENT	MAINLINE RESPONSE
19.37	• The opinion that a single Eastern Wood Pewee observation does not constitute SWH is not supported. The SWH criteria do not include an abundance threshold and therefore a single breeding occurrence in suitable habitat constitutes SWH. Nevertheless, staff do not consider the CUW1-1 polygon to be present and therefor the occurrence there is not SWH. If breeding in the FOD8-3 woodland, it would constitute SWH. However, as the Secondary Plan proposal only removes a very small portion of that community and compensation is provided, it would not represent a constraint to the proposal. Revise accordingly.	Acknowledged. SLR will revise the text regarding Eastern Wood-Pewee presence and SWH on the Prologis lands.
19.38	• Discussion on the Town policies regarding the inclusion of Buckthorn in woodland delineations is not fulsome and therefore inaccurate (i.e., it does not include the buckthorn exemption criteria and, as no analysis was provided in the CEISMP or EIS, it is assumed that the criteria is not met). Revise to include the exemption criteria or delete the discussion. Note that the removal of a portion of the woodland is being supported through the CEISMP. Therefore, there is no need for this discussion.	Thank you for the input. SLR will revise and or delete the discussion regarding buckthorn
19.39	• It is not accurate that the Town's OP only considers Core Woodlands as Significant Woodlands. While Significant Woodlands are not explicitly identified in the OP, both Core Woodlands and Other Woodlands are considered Significant Woodlands, albeit with differing associated policies. Revise for clarity.	The EIS wording regarding Significant Woodlands will be revised.
19.4	• In stating that channel realignment is proposed in Phase 1A, it is inconsistent with the SWM report that it will be done in Stage 1B (which is not possible and unsupported). It is indicated the MHBC has prepared restoration drawings - these must be reviewed and implemented as part of subdivision detailed design.	Detailed channel realignment design has been prepared as part of subdivision detailed design. Wording regarding phasing will be revised.
19.41	• The interim SWM pond outlet must be evaluated in the EIS (location, treatment, feature-based water balance, restoration post-removal, etc). As it appears to be outletting directly to wetland with terrestrial crayfish SWH, the evaluation must demonstrate that the mitigation requirements contained within the SWH Mitigation Support Tool will be met.	A portion of the original wetland will be retained that also satisfies the interim need while the new compensation wetland area is being relocated. Work will be completed in the summertime to align with the RSD timing requirements.
19.42	• It is indicated that an invasive species management plan has not been prepared. The recommendations of the CEISMP must be implemented.	The CEISMP direction regarding any Invasive Species Management Plan is being revised; once revised, direction will be followed.
19.43	• The grading plans display a substantial retaining wall along the realigned channel. This must be evaluated in the EIS. See the related comment above.	Proposed retaining wall to be discussed in updated EIS.

COMMENT #	COMMENT	MAINLINE RESPONSE
19.44	**Draft Plan of Subdivision, Zoning By-law and Planning Justification Report:** • Revise to be consistent with and implement the Secondary Plan once finalized.	The Draft Plan of Subdivision, Draft Zoning By-law and Planning Justification Report have been coordinated for consistency with the adopted Secondary Plan (OPA 287).
19.45	**Architectural Plans:** • While it is a site plan issue and will be reviewed against the Green Development Standards at that time, note that spandrel glazing is reflective and therefore must be considered when meeting that metric.	Proposed building elevation calculations for GDS metrics have been updated to include visual markers at spandrel glass.

We trust that the application has been well received and will be circulated to all the necessary departments and agencies. Should you have any questions, please contact the undersigned.

Sincerely,

mainline planning services inc.



James Davidson, Planner