

RESPONSE MATRIX TO SECOND SUBMISSION (August 2025) COMMENTS - SCOPED TO SUBWATERSHED STUDY COMMENTS ONLY Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)							
#	REVIEWER	DATE RECEIVED (1)	REVIEWER COMMENTS (1)	FORMAL RESPONSE (1)	DATE RECEIVED (2)	REVIEWER COMMENTS (2)	FORMAL RESPONSE (2)
1	Montrose Environmental	Mar 3 2025	GENERAL COMMENTS Various gaps in the LSS reporting have been identified, based upon a review of the requirements per the Terms of Reference (October 2024) versus the information presented in the LSS (July 2024). In some instances, the information is provided within the FSR, rather than within the LSS.	Acknowledged. All field studies are complete and have been included in the updated LSS.	Oct 2 2025	No specific action. Any remaining gaps (if any) are identified within specific comments below.	No action.
2	Montrose Environmental	Mar 3 2025	Given that the LSS represents the Parent Study to establish the stormwater and environmental management strategy for the study area, and is thus the reference document for future studies within and adjacent to the study area, it is recommended that the LSS be fully updated to include the information required per the Terms of Reference. This approach will better ensure that the conclusions and recommendations for the study area are integrated into both the current and future studies.	Acknowledged. LSS has been updated with the latest information.	Oct 2 2025	No specific action. Any remaining gaps (if any) are identified within specific comments below.	No action.
3	Montrose Environmental	Mar 3 2025	There seems to be frequent mention of climate change with non-specific commitments. The commitments recognize the need/value of green infrastructure or LID measures, designing for increased volumes and intensity of rainfall, but few details are provided. It is understood that details may be forthcoming with detailed designs, but there is a lack of goals identified that would provide direction for future detailed design. These details should be provided in the current reporting.	At the time of the writing of the First Submission of the LSS, no specific guidelines from the Town were available. Similarly, the ToR does not indicate climate change assessments are required at the Secondary Plan level. Through discussions with agency staff and the reviewers, further discussion regarding climate change has been provided as part of the LSS resubmission. Further information and analyses will be completed at the Tertiary Plan level when more detail is required and relevant.	Oct 2 2025	Comment Not Addressed: Climate adjustment assessment not done for erosion - note data are available and approach should be discussed with TAC	The runoff coefficient from the high-flow scenario (0.47 vs 0.28 in the baseline) would more than account for a 10-20% increase in precipitation due to climate change. Erosion exceedance results for the high-flow scenario show that the SWM mitigates the erosion risk. The LSS includes additional information regarding climate impacts. Section 11.11 Climate Change provides detailed information on the approach taken, with other references made throughout the LSS. Information on proposed actions to be undertaken in future phases is outlined in the Climate Adaptation Plan dated December 1, 2025.
4	Montrose Environmental	Mar 3 2025	BACKGROUND INFORMATION Page 5 – Objectives – states "...the interactions and interdependencies between the system within the Secondary Plan and local environs." – it is not clear from the LSS how this has been achieved; more details are required.	The proposed Natural Heritage System as outlined and defined by the studies completed for the LSS is intended to maintain and/or improve the overall system, thus showing how the interaction between proposed development and natural heritage can be achieved in the Alloa Secondary Plan. Similarly, the interdependency of environment and development can also be achieved. This is accomplished through several features in the proposed plan including (but not limited to): 200% increase in natural cover, the naturalization and improvement of the Alloa Drain corridor, 6800 m of new channel and 3.5 ha of constructed wetland, proposed LID and SWM to maintain the natural hydrologic regime, and minimal hydrologic impact to existing wetlands and natural features.	Oct 2 2025	Comment Addressed	No action.
5	Montrose Environmental	Mar 3 2025	Page 6 – Objectives – states "iterative Impact Assessment based on an initial Secondary Plan Land Use Plan (LSS first submission), followed by a second refined land use concept (LSS second submission) developed through the feedback from the initial testing..." – it does not appear that an iterative approach to land use impact assessment was followed per the stated objectives – this needs to be addressed.	The iterative impact assessment, noted in Section 5, is achieved through the resubmission of the LSS following commentary from stakeholders and agencies (i.e., addressing comments and concerns through a second submission). The Secondary Plan has been refined and revised following comments from the agencies and stakeholders, hence the iterative approach.	Oct 2 2025	Comment not addressed: progression of changes to the SP LU plan from initial to current need to be documented and tracked	We believe this comment has been addressed and no further response is required. Please refer to the approved Secondary Plan for details of the revisions completed as a result of previous agency comments and adjustments due to the revised impact assessments.
6	Montrose Environmental	Mar 3 2025	Page 6 – Objectives – states "Support the Class Environmental Assessment (EA) processes ..." – it is unclear how the LSS is supporting infrastructure planning – this needs to be clarified.	The supporting field studies completed as part of the LSS will provide the data and analyses to support any EA processes that may be required within the Alloa LSS area. As an example, the hydrogeological investigation has advanced monitoring wells across the property which may also serve to support the study requirements of a Municipal Class EA.	Oct 2 2025	* Partially addressed* : needs to be clear alignment between natural and water-based data from LSS to form the baseline inventory for Class EA studies - roads, W/WW etc.	We believe this comment has been addressed through the technical details provided in the LSS. No further changes have been made.
7	Montrose Environmental	Mar 3 2025	Page 6 and 7 – Detailed Background Review – the Scoped LSS should be indicated as a key reference for this work.	The Scoped LSS was reviewed however the detailed data received from TRCA and CVC provided more comprehensive background information for use in the Alloa LSS.	Oct 2 2025	Comment not addressed: still should reference the Scoped SWS	Addressed. Reference added in Section 3 and throughout the report.
8	Montrose Environmental	Mar 3 2025	Page 7 – Section 6.1.2 Natural Areas Inventory Background Data refers to "receipt of all TRCA data remains pending" – need to update and incorporate this information once available.	Acknowledged. LSS has been updated with the latest information.	Oct 2 2025	Comment Addressed	No action.
9	Montrose Environmental	Mar 3 2025	BASILINE INVENTORY Hydrogeology Page 14 Section 7.1 – states "Assessment of the interactions between the groundwater system and the surface water system to determine the overall role or function of these interactions in an ecosystem context" – it is not clear from the LSS how this task has been addressed. Further, it is also unclear as to whether the field program was reviewed and approved by the TAC prior to initiation?	The hydrogeological investigation has looked at the groundwater system and how it interacts (if at all) with the surface water resources within the Secondary Plan area. The findings of the investigation will help to determine features that are groundwater vs surface water fed as well as establish targets for infiltration and water balance for future draft plans. A high level review of the proposed groundwater field program was presented to the TAC on June 18, 2024 with an offer to share data or adjust monitoring frequency or locations with stakeholders. No requests were made at the time. The field program and the TOR was approved by the Town and stakeholders officially on March 5, 2025. Additionally, the TRCA is actively involved in the project via regular calls with the consultant team.	Oct 2 2025	*Partially Addressed* Establishing and characterizing the groundwater function within the PSA (as it relates to GW-SW interaction) is stated as an objective throughout the report and requirement of the TOR - the newly incorporated groundwater monitoring data discussed in Section 7.1 helps to that end. However, the lack of staff gauge hydrographs (installed but no data presented) and spot baseflow measurements (out of field program scope) limits the interpretations around groundwater-surface water interaction. Please provide additional text at the end of Section 7.1 tying together all the interpretations made in 7.1.7 into a baseline conceptual model of the shallow groundwater flow system and its interaction to surface water features, as per the TOR Section 2.2.3.	Addressed. Further discussion on SW-GW dynamics have been included in Section 7.1.8.11, within the Recharge and Discharge section.

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10	Montrose Environmental	Mar 3 2025	Page 14 Section 7.1 - states "Additional site-specific data for the Primary Study Area is currently being collected and data collection will continue as the lands progress through the development stages and post development. Future additions to the field program will be aimed at supporting further detailed analyses, refining existing data collection sources, and enhancing the understanding of the hydrogeological system and may include" – this suggests that the work submitted is more of a work in progress (WIP) as opposed to a fully informed characterization of the study area – this needs to be addressed.	The groundwater monitoring program was initiated on Phase 1 in Fall 2023 and Phase 2 in Winter 2024. The surface water monitoring program was initiated in Spring 2024. Crozier recognizes that within the Town's TOR, multi-year data is required to fully characterize the hydrogeological regime. The study as been updated to reflect the data collected to date; it should be noted that the additional data continues to reaffirm the current understanding of the system. Crozier expects that the monitoring program may be refined from time to time to as part of our QA/QC and continous improvement processes. Any characterization study is a work in progress by design.	Oct 2 2025	*Partially Addressed* Understood, however since the new submission contains significantly more groundwater monitoring data with subsequent interpretations on the hydrogeology, there are many new comments related to these datasets and interpretations. These new comments can be found at the end of the comment response matrix, in rows 285 to 301	Addressed. See new comments/responses in rows 285 to 301.
11	Montrose Environmental	Mar 3 2025	Page 15 Section 7.1 - states "Future LID design measures will be provided where feasible to mitigate any infiltration reduction based on the hydrogeological conditions for the site." – it is unclear what is considered infeasible – the metrics and possible considerations associated with feasibility should be documented.	Crozier did not use the term "infeasible". Crozier stated that "Future LID design measures will be provided where feasible" and that is accurate. Proposed LID options are further outlined within the Phase 3 of the LSS. Discussion of the feasibility of introduction of infiltration based LIDs is discussed within the LSS.	Oct 2 2025	Comment not addressed: requires clear documentation of feasibility metrics - subject section does not speak to this. See Comment 4a in FSR Comment Section	Addressed. Feasibility metrics to assess LID potential are noted in Section 7.1.1 and commentary on feasibility metrics with relation to LID implementation is included in Section 18.1.5.
12	Montrose Environmental	Mar 3 2025	Page 15 Section 7.1 - states that the first year of data collection was during a "historically wet season" – in light of this, will future data be added in order to provide a more representative characterization of the study area?	Additional data has been provided throughout the report and data collection continues now and is ongoing. Updated data can be provided to the review team upon request. The data collected to date is interpreted to be representative of long-term trends and demonstrates both wet and dry seasons.	Oct 2 2025	Comment not addressed: Updated data need to be integrated into report; clear documentation as to how much longer monitoring is proposed and how these data will be used near term/long term; subject section (7.1.7 only deals with wells)	Addressed. Up to date data has been provided within Tables 4-9 within Section 7.1.8, and discussed within several subheadings within Section 7.1.8. (i.e. groundwater levels, peak groundwater conditions, seasonal groundwater fluctuations). Monitoring duration is proposed to continue for a minimum of three (3) years as mandated by the TRCA and Town of Caledon standards.
13	Montrose Environmental	Mar 3 2025	Page 19 Section 7.1.2 – states that a monitoring network was established in 2024 for "...key wetlands and woodlots identified on the property to support the feature-based water balance model" – did the TAC review these and approve the field program? The same section states that "Note that additional piezometers, flow monitors, streamflow locations and staff gauges are proposed to be installed the Summer of 2024 to support future detailed analysis ..." – this suggests that the submitted report is a work in progress – this needs to be addressed in future reporting/submissions.	As noted above, the proposed field program was presented to the TAC and within the Terms of Reference. The additional monitoring equipment was installed during the dry season to ensure proper placement of equipment. The section has been revised for clarity. Crozier suggests that Montrose request and review historical information to avoid additional inefficient and wasteful comments in the future.	Oct 2 2025	Comment partially addressed: need to discuss since the sentence provided in the LSS section cited is vague - need clearer documentation - this is not considered a "wasteful" comment but rather a best practice	Addressed. Commentary on the number and locations of piezometers have been provided in Section 7.1.1 and Section 7.1.6.3 - Site Wide Wetland Monitoring Network. The surface water monitoring network was established in Spring/Summer of 2024 to present. Additions to both the groundwater and surface water monitoring networks have been made on an ongoing as required basis when the Alloa Consultant Team has identified areas that would benefit from additional data collection. The level of data presented in this report is considered to be sufficient to establish a site-wide conceptual model capable of supporting this LSS. The first year of data collection (2023) occurred during a historically wet season, the subsequent year (2024) demonstrates a typical seasonal pattern, while the most recent year (2025) represented an atypical double melt period and relatively dry spring and summer.
14	Montrose Environmental	Mar 3 2025	Page 40 Section 7.1.7 – refers to groundwater chemistry for Mayfield West – while useful for a general area characterization and comparison – local testing should also be completed.	Local testing was completed on the property at MW24-1 S/D and within the Alloa Drain. Please refer to the LSS for groundwater and surface water sampling results.	Oct 2 2025	Comment Addressed	No action.
15	Montrose Environmental	Mar 3 2025	Page 42 Section 7.1.7 states that "...groundwater discharge may be occurring periodically at Wetland #4, Wetland #6, and Wetland #7." inferring more (or future) interpretation – this needs to be considered in future reporting/submissions.	Acknowledged. More data has been collected over the past several months and the LSS has been updated accordingly.	Oct 2 2025	Comment partially addressed (see new hydrogeology comment in Excel Row 292/295/297 for more detail). Including hydrograph plots for each wetland monitoring location where the groundwater, mini-piezometer and staff gauge hydrographs are all plotted together in meters above sea level (m asl), would significantly improve the interpretations around the groundwater discharge occurring (or not occurring) at specific wetlands. Furthermore, combining these datasets with the interpolated groundwater flow map would help strengthen this discussion.	Addressed. Please see new comments/responses in Excel Row 292/295/297 for more detail.
16	Montrose Environmental	Mar 3 2025	Wetland Water Balance Page 45 Section 7.2 states that "A companion field study is being conducted by Azimuth Environmental and Cunningham Environmental Associates to further ecologically classify the wetland systems" – has this been completed – trust there will be future consideration of these data in an update to the LSS?	Additional field data collection and analysis was completed by Azimuth and CEA following the first submission of the LSS. Consideration of this data is included in the updated LSS document.	Oct 2 2025	Partially Addressed. See comment response 10 in Baseline Inventory	Addressed. See new comments/responses in rows 285 to 301.
17	Montrose Environmental	Mar 3 2025	Page 46 Table 10 – this table has several cells noted at TBD – will this be updated?	Additional field data collection and analysis was completed by Azimuth and CEA following the first submission of the LSS.	Oct 2 2025	Partially Addressed. See comment response 10 in Baseline Inventory	Addressed. See new comments/responses in rows 285 to 301.
18	Montrose Environmental	Mar 3 2025	Page 47 Section 7.2.2 in reference to Table 11 the authors note "Note that the systems are subject to iteration following additional monitoring" – will this be addressed in an update to the LSS?	The LSS has been updated accordingly to include additional data.	Oct 2 2025	Partially Addressed. See comment response 10 in Baseline Inventory	Addressed. See new comments/responses in rows 285 to 301.

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19	Montrose Environmental	Mar 3 2025	<p><u>Site Wide Water Balance</u></p> <p>Page 49 Section 7.3 – the application of Thornthwaite & Mather approach to water balance is not appropriate for a LSS; a continuous hydrological modelling approach should be conducted per the approved TOR. The same section indicates that “Note that mitigation measures will be implemented at further stages of development...” – these impacts need to be assessed in the LSS and mitigation strategies outlined accordingly.</p>	A continuous hydrologic model was completed for the site water balance, as part of the LSS. Mitigation measures are assessed in the LSS at a high level based on groundwater monitoring data for the subject site.	Oct 2 2025	<p>Comment not addressed: It is unclear why 11 mm have been provided when the most conservative required capture is 2 mm? Details in SSS have not been reviewed; evidence of TRCA support is required per memo in App J</p> <p>Further - *Comment from Hydrogeology Team* It is noted that in the Alloa TOR – section 2.2.3 incorrectly states that Visual OTTHMO or PCSWMM are industry standard numerical groundwater modelling softwares. The use of the continuous VO to understand pre and post development recharge within the overall LSS water balance assessment is appropriate, however this tool does not provide for the explicit characterization baseline groundwater flow conditions nor can it assess impacts to groundwater flow directions and groundwater discharge under developed conditions. Industry standard groundwater models include models such as MODFLOW and FEFLOW which represent the subsurface conditions and simulate three-dimensional groundwater flow, providing an understanding spatial and temporal variation in the recharge, discharge, water table depth and understanding of linkages between recharge and discharge areas and sensitivity to changes in the recharge.</p>	<p>As per Section 3.5.5 of the Scoped Servicing Study (provided in Appendix K of the LSS), retention of 11 mm is required for the purpose of erosion mitigation. It should be noted that this target of 11 mm was established based on the most conservative scenario (i.e., “low runoff”) assessed as part of the sensitivity analysis. The retention required to provide erosion mitigation exceeds the infiltration requirements for the site water balance.</p> <p>Further - the groundwater calibrated wetland water balance has been removed. After discussion with Urbantech and the greater project team, it was determined that the outputs were not representative of the overall system due to reasons noted by the review team.</p>
20	Montrose Environmental	Mar 3 2025	<p>Page 50 Section 7.3.1 states that “Precipitation data from this station will be referenced in the site wide water budget following completion of a year of data such that monthly averages can be used for calculations.” – will this assessment be updated based on the completion of a year’s worth of data? In the same section the climate normals to 2010 were used – can this be extended to the 2020’s?</p>	The climate normals from 1981-2010 will continue to be used for this submission for the site wide water balance, as agreed upon with the TRCA. Given the approach to do a sensitivity analysis at this stage in absence of calibration data, this dataset is sufficient to establish the sensitivity of parameters. As local precipitation data and calibration data is obtained, the model will be updated accordingly. However, the sensitivity analysis will provide a range of outputs which are sufficient at this time to support the Secondary Plan. Refinements will be made as data becomes available through future planning applications.	Oct 2 2025	<p>Comment Partially Addressed We agree that using a sensitivity analysis approach is appropriate at this stage of the project. Please provide more context for how the high and low antecedent moisture conditions (AMC) scenarios cover off the variability in climate. We understand a range of AMC was used in the sensitivity to evaluate how runoff and recharge would change with the range of AMC, however please clarify how this accounts for potentially higher precipitation inputs under more recent climate (i.e. 2010-2020).</p> <p>New Comment We would also like to see output of monthly infiltration for each sensitivity scenario and simulated baseflow and compared to available measurements. At a minimum please provide information on the simulated baseflow between baseline, high, med and low. The monthly infiltration will help better understand seasonality for sizing of LIDs; and the baseflow comparison will provide another measure of the ability of the model to simulate realistic infiltration and provide more context for the representativeness of the baseline, high and low infiltration estimates.”</p>	The adjustments to CN number were agreed upon with the Town’s peer review team. These do not account for high precipitation input, but TRCA has indicated that their recommended data set (Buttonville) incorporates a sufficient mix of dry and wet years. When additional climate data sets become available (i.e., continuous rainfall and temperature adjusted for future climate impacts), the system can continue to be evaluated.
21	Montrose Environmental	Mar 3 2025	<p>Page 52 – Drawing 14 – how accurate is the estimate of 55% imperviousness for the rurally developed properties – this seems high?</p>	The pre-development scenario in the continuous model used for the site water balance assumes an imperviousness of 0%, per the Etobicoke creek LSS hydrology model	Oct 2 2025	<p>Comment not addressed: what imperviousness was assumed for rural properties? Previously shown as 55%?</p>	As noted in the previous comment response, the imperviousness used in the pre-development scenario for rural properties was updated from 55% to 0%.
22	Montrose Environmental	Mar 3 2025	<p>Page 54 – Section 7.3.2 – which TRCA mapping and studies is the 151.6 mm/yr consistent with? Please provide these references.</p>	<p>The groundwater recharge for the greater watershed has been estimated to be between 50 mm/yr and 300 mm/yr within the Water Budget and Stress Assessment by the Toronto and Region Source Protection Area. The LSS has been updated for clarity and references have been provided.</p> <p>URBANTECH: The TRCA mapping/studies referred to are the Etobicoke Creek and mimico Creek Watersheds Technical Update (TRCA, 2010).</p>	Oct 2 2025	<p>Comment Addressed</p>	No action.
23	Montrose Environmental	Mar 3 2025	<p><u>Hydrology and Hydraulics</u></p> <p>General comment – the report content provided in both the LSS and FSR documents were compared to the requirements outlined in the TOR. A summary of report conformance to the TOR is provided below (see table in original comment document, Montrose p.5). As noted in the covering letter, it is expected that the updated LSS and FSR will be in full compliance with the TOR (October 2024), and notably include updated Hydrologic and Hydraulic modelling.</p>	Acknowledged. LSS to be updated with the latest information.	Oct 2 2025	<p>Comment not addressed - see response to Comment 8 on FSR</p>	As per Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS), hydrologic analysis has been extended to the downstream reaches to demonstrate that there are no impacts in Etobicoke Creek and Huttonville/Fletchers Creek. As per Section 11.5 in the LSS, hydraulic analysis has been completed to evaluate existing and proposed crossings and water levels throughout the system.
24	Montrose Environmental	Mar 3 2025	<p>Page 56 – Figure 15 – why is there no channel routing in the VO single event model? Also, what is the timestep in the continuous simulation?</p>	A scenario was used in the VO single event model (Regional storm) where the channel routing was removed, for the purposes of the 2D hydraulic HEC-RAS model only. A 15min time step is used in the continuous model	Oct 2 2025	<p>Comment addressed</p>	No action.

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25	Montrose Environmental	Mar 3 2025	Page 57 – Section 7.4.1 – it is unclear why the erosion thresholds from work over 10 years old is being applied in this study – it is suggested that these thresholds need to be revisited and at a minimum confirmed through contemporary assessments.	<p>The application of erosion thresholds differs between subwatersheds/watersheds within the jurisdictions of CVC and TRCA. For SWM Ponds within subwatersheds in CVC's jurisdiction, the contributing drainage areas are relatively small, and target erosion thresholds were generally previously identified and documented through accepted technical studies in support of downstream development. CVC have staff advised that these existing, approved targets should be carried forward and that re-analysis is not necessary. No SWM Ponds are proposed to outlet to West Huttonville Creek; however, findings of the ongoing Heritage Heights LSS will be integrated into the LSS when available and where appropriate.</p> <p>For SWM Ponds within the Etobicoke Creek watershed and TRCA's jurisdiction, erosion thresholds documented in the Mayfield West Phase 2 CEISMP (AMEC, 2014) will be used. The erosion analysis is currently being updated as part of the ongoing refinement of the LSS, including updated exceedance analyses.</p> <p>Additionally, a terrain analysis comparing high-resolution LIDAR-derived digital elevation models (DEMs) from the years 2015 and 2023 were completed for the subject erosion-sensitive reaches along the receiving watercourses to evaluate whether land surface changes (i.e., relative increases or decreases in surface elevation) in the intervening period warranted erosion threshold updates. Results of this terrain analysis show that reaches have not undergone significant planform adjustment and therefore the previous erosion thresholds are confirmed to be appropriate for the current pre- to post-development erosion exceedance analysis. Details will be provided in the second LSS submission.</p>	Oct 2 2025	Comment partially addressed: provide documentation of CVC acceptance regarding use of erosion thresholds from 2014; Comment partially addressed: given ongoing Heritage Heights study - areas of Alloa potentially affected by decisions/criteria in HHSWS need to consider and align accordingly; need to have agency concurrent that a desktop technique (using LIDAR comparisons) is appropriate for a SWS - typically these need to be updated using field data	The approach to erosion thresholds and the erosion mitigation analysis was discussed during the TAC meeting held on April 23, 2025, which was attended by the Town, the Town's peer review team, TRCA, CVC, the LSS Consultant Team. The general approach was deemed acceptable by meeting attendees. In addition, CVC has not provided any formal comments on our erosion mitigation approach, confirming that they have no concerns.
26	Montrose Environmental	Mar 3 2025	Page 61 – Table 18 – why is the Regional Storm cited as "Future Scenario" rather than existing?	The scenario naming has been revised. The term "Future Scenario" was the name of the original TRCA model, which represented future conditions downstream of the subject lands. This is the scenario which was used as the basis for the existing conditions model for the study area.	Oct 2 2025	Comment addressed	No action.
27	Montrose Environmental	Mar 3 2025	Page 61 – Table 18 - The information in Table 18 of the LSS indicates that the refined VO hydrologic model generated peak flows which closely compare to those generated from the Parent Model provided by TRCA. This finding differs from general modelling practice, which indicates that increased refinement (i.e. increased number of subcatchments) tends to yield significantly different, and typically higher, peak flows compared to that obtained from the Parent Model. Additional information is thus required to rationalize the findings presented in the LSS.	The changes to the original TRCA model were minimal. The TRCA model was discretized appropriately for a LSS scale and therefore, no significant changes were made beyond minor drainage area and Tip adjustments. Consistency with the approved / established TRCA model is considered to be a positive outcome of the existing conditions model update.	Oct 2 2025	Comment not addressed. Further clarification required regarding extent of refinements. See also comments below regarding the hydrologic model Technical Memorandum	As per Section 3.2 of the Scoped Servicing Study (provided in Appendix K of the LSS), the extent of refinements involved minor adjustments to drainage areas to reflect topographic mapping, and division of several large catchments to facilitate more detailed discretization of the channel flows. Refer to Drawing 3A which illustrates the existing TRCA catchments and refined existing drainage areas.
28	Montrose Environmental	Mar 3 2025	Page 62 – Section 7.4.3 – why was the simulation period terminated at 2007? The meteorological record should be extended to the 2020's as a minimum. Further the deferral cited of the continuous modelling to the Draft Plan stage cannot be supported as this is not consistent with industry practice nor the TOR.	The Buttonville Airport data set recommended by TRCA for use in continuous modeling terminates at 2007. During the workshop on April 23, 2025 with various agencies, including Montrose, extending the data set was discussed, however, TRCA noted that the 1986-2007 data set captures a suitable range of wet and dry years, as well as extreme events. As discussed in the April 25th workshop, a sensitivity analysis was completed for the continuous hydrology model, which provides a minimum and maximum range. The purpose of using the minimum and maximum range from the sensitivity analysis for the given data set (1986-2007) is to provide a conservative approach to the erosion analysis, site water balance analysis and the feature-based water balance analysis until enough flow monitoring data is available to calibrate the continuous hydrology model.	Oct 2 2025	Comment addressed	No action.
29	Montrose Environmental	Mar 3 2025	Page 62 – Section 7.4.3 – more details are required on the wetland feature based water balance analysis methodology particularly the details associated with wetland bathymetry and reservoir modelling.	More detail on the wetland bathymetry and how the wetlands were modeled as reservoirs is provided in Section 7.4.3 of the LSS.	Oct 2 2025	Comment addressed: Note wrong section reference but acknowledged that more details have been added	No action.
30	Montrose Environmental	Mar 3 2025	Page 63 – Section 7.4.4 – the Etobicoke Creek Synthesis study is credited to AMEC (Dec 2014) – this reference is incorrect.	This has been revised, and the appropriate reference to CH2MHILL/TRCA as the authors has been noted.	Oct 2 2025	Comment Addressed	No action.

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31	Montrose Environmental	Mar 3 2025	Page 63 – Section 7.4.4 – states “Through frequent consultation with TRCA and Town of Caledon staff and senior management in late 2022 to early 2023, the challenges with the hydraulic modelling and ultimate development of this area have been explored, and area-specific solutions have been developed and agreed to with the agencies to define a suitable approach to modelling the subject lands under existing and proposed conditions (specific to Area 10).” – the background and associated documentation of TAC support needs to be included in the reporting and associated documentation, particularly the reference to “post-development flood storage does not have to match pre-development flood storage” – as this is counter to accepted convention and industry practice.	Based on the changes discussed with TRCA staff through meetings and workshops in 2024 and 2025, namely application of the 1D, unsteady state HEC-RAS model and adjustment of Manning’s roughness values, the proposed change in riparian storage is minimal. It has been agreed with TRCA to increase the channel block by 10m (bottom width) to provide additional storage. The net impact of the change in storage has no (significant) impact on the routing of flows and will not affect the general relationship between flood storage and discharge.	Oct 2 2025	Comment not addressed - clear evidence of TRCA support required	TRCA has released comments indicating that they have no further concerns with the modelling. As noted in Section 4.1.1 of the Scoped Servicing Study (provided in Appendix K of the LSS), a copy of the key correspondence (modelling memo & TRCA comments, presentations, meeting notes, etc.) is included in Appendix C of the Scoped Servicing Study.
32	Montrose Environmental	Mar 3 2025	Page 63 – Section 7.4.4 states “TRCA recommended the use of a quasi-steady state approach, in which hydrographs from the Visual OTTHYMO model were extended at the peak flow time until the end of the simulation. The ROUTE CHANNEL elements were removed from the Visual OTTHYMO model to avoid double-counting flow routing (i.e. in VO and in the 2D model” – further details are required in order to support the rationale for this approach.	While a quasi-steady state model is no longer proposed, a fully unsteady 1D HEC-RAS model is proposed, using the unrouted flows (i.e. no channel routing) from the VO model, since the routing is accounted for in the HEC-RAS model. Note that the unrouted flow scenario in VO is only applicable as input to the 1D unsteady HEC-RAS model and is not used for other scenarios. The LWSS text has been amended to describe the proposed modelling approach.	Oct 2 2025	Comment addressed	No action.
33	Montrose Environmental	Mar 3 2025	Page 65 – Section 7.4.4 – what is meant by the “FP Mayfield Lands”?	The FP Mayfield lands are located immediately east of Chinguacousy Road. Recent submissions for this project involved updates to the hydraulic modelling.	Oct 2 2025	Comment addressed	No action.
34	Montrose Environmental	Mar 3 2025	Page 65 – Section 7.4.4 – reference is made that the 50 ha drainage threshold for flood plain mapping represents industry practice – while it is agreed that this is a guide - the decision as to whether a fluvial feature attracts a formal regulation is also based on other factors and the final decision rests with the Conservation Authority; the text should acknowledge this more fulsome set of considerations.	The text will be updated to clarify that while the 50 ha drainage area threshold is a commonly used as a screening guideline for determining the need for floodplain mapping, the determination of whether a drainage feature/watercourse is subject to regulation is ultimately based on a broader set of criteria. These include physical characteristics of the feature, functional connectivity, erosion and flood risk, and other site-specific factors assessed by the Conservation Authority. The final decision regarding regulation resides with the Conservation Authority.	Oct 2 2025	Comment not addressed: subject text does not appear to be in the sensitivity memo?	The text was not intended to be in the sensitivity analysis memo - this has been incorporated into Section 4 of the Scoped Servicing Study text and Section 7.4.2.1 of the LSS. The wording has been refined to explain the approach to floodmapping as it relates to the 50 ha limit, while acknowledging that the regulatory status of a watercourse includes factors other than floodplain mapping.
35	Montrose Environmental	Mar 3 2025	Page 67 – Table 19 - Table 19 of the LSS provides the hydraulic structure inventory used to develop the HEC-RAS hydraulic model. It is suggested that the LSS Team confirm whether this information has been obtained from geodetic survey, and that this data source be documented in the LSS accordingly.	the source of information in the culvert inventory has now been noted in the text. additional survey details will be provided through subsequent stages of design	Oct 2 2025	Comment not addressed: there is no section 4.2.3 in the Sensitivity Analysis Memo in Appx J	To clarify, the culvert evaluation details are included in the SSS, not within the Sensitivity Analysis memo. Section 4.1.2 of the Sensitivity Analysis Memo describes the source of the culvert information (TRCA HEC-RAS model, supplemented with additional survey data where available).
36	Montrose Environmental	Mar 3 2025	Page 69 – Section 7.4.6 – it is unclear why flood storage was assessed with and without structures in place? A rationale should be provided.	In our experience, both approaches to evaluating impacts on channel modification have been used; however, at this time, only the no-culverts scenario is utilized to evaluated flood storage changes.	Oct 2 2025	Comment partially addressed: rationale should be included in LSS	Flood storage is no longer assessed with structures - only without structures as per the SSS Section 4.1.3 and 4.2.3.
37	Montrose Environmental	Mar 3 2025	Page 72 – Section 7.4.6 – the authors cite agreements with TRCA related to the best-efforts approach to meeting flood storage – the report needs to include supporting documentation on this perspective. Also – why was the analysis limited to the Regional Storm? Typically, the full range of flow rates are used? Also deferring the 1D analysis to the Draft Plan stage is not considered appropriate for a LSS.	Please refer to TRCA’s Comment #1 in this matrix which indicates that a best efforts approach is acceptable. The LSS documents the history and coordination of the 2D model for the lands west of Mississauga Road, through which this position was agreed upon with TRCA.	Oct 2 2025	Comment partially addressed: second part of question not answered with respect to full range of flow rates	Urbantech met with TRCA and Town staff in December 2023 to discuss and agree to the approach for modelling and maintaining storage west of Mississauga Road. It was demonstrated in the LSS/ SSS that loss of >200,000m3 of storage had no appreciable impact on downstream flows. TRCA has no further comments on this. The correspondence is included in Appendix C of the Scoped Servicing Study (SSS can be found in Appendix K of the LSS).
38	Montrose Environmental	Mar 3 2025	Page 72 - Section 7.4.6 of the LSS notes that HEC-RAS 2D modelling has been completed in certain locations to assess riparian storage volumes, and that these analyses have focused on the Regional Storm event only. We trust that TRCA will review and comment on this modelling accordingly, as this relates directly to the Authority’s regulation.	The riparian storage analysis has been extended to the 2-year to 100-year and Regional event for the lands east of Mississauga Road.	Oct 2 2025	Comment Addressed	No action.
39	Montrose Environmental	Mar 3 2025	Page 73 – Section 7.4.6 indicates that there is significant flow leaving the study area – is this a formal spill? Has TRCA supported downstream reductions in flow rates?	The modelling strategy has been revised and the spill is no longer counted in the 1D model east of Mississauga Road - the full flows from the catchments west of Mississauga Road are accounted for downstream. TRCA is aware of the spill, but it is not shown on their current regulation mapping.	Oct 2 2025	Comment partially addressed. Please see comments below regarding the HEC-RAS modelling.	Acknowledged.

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40	Montrose Environmental	Mar 3 2025	Fluvial Geomorphology Page 73 – Section 7.5 - the fluvial geomorphology component of the characterization immediately covers the details of the Headwater Drainage Feature Assessment (HDFA). It is assumed that this is because the HDFA is provided under a separate cover (Appendix K) to the Fluvial Geomorphology Assessment (Appendix L). An introduction to both HDFs and Watercourses should be included in this section, or earlier, with appropriate reference in Section 7.5. This recommended introduction section can include definitions (see next comment).	Section 7.5 will be revised to include a paragraph that clarifies the relationship between the fluvial geomorphology assessment and the HDF Assessment. Definitions and context for both HDFs and watercourses will be provided at the outset of this section, with appropriate cross-referencing to Appendices K and L to ensure clarity in how the two assessments are integrated within the broader existing conditions assessment.	Oct 2 2025	Comment addressed - Section 7.5 now includes definition of HDF and watercourse. However, Section 7.5.5 has includes references to the HDF appendix (App K) for more details on watercourse reaches instead of the Fluvial Geomorphology Appendix (App M).	Appendix references have been updated in the LSS third submission.
41	Montrose Environmental	Mar 3 2025	Page 73 – Section 7.5 – has the new definition of watercourse been considered in this assessment?	Yes, the assessment has incorporated the updated definition of "watercourse" as outlined in Ontario Regulation 41/24 under the <i>Conservation Authorities Act, 1990</i> . The regulation defines a watercourse as: "A defined channel, having a bed and banks or sides, in which a flow of water regularly or continuously occurs". This refined definition has been applied throughout the fluvial geomorphology assessment and HDF assessment to accurately distinguish between regulated watercourses and other drainage features. This approach ensures consistency with current regulatory frameworks and supports appropriate management strategies for each feature type. As noted in Comment 40, Section 7.5 will be updated to include the watercourse definition.	Oct 2 2025	Comment addressed - Section 7.5 now includes definition of HDF and watercourse. New editorial comment: Section 7.5.5 has included references to the HDF appendix (App K) for more details on watercourse reaches instead of the Fluvial Geomorphology Appendix (App M).	Appendix references have been updated in the LSS third submission.
42	Montrose Environmental	Mar 3 2025	Page 73 – Section 7.5.1 – the text states that "The third site visit will be completed in July or August following a period of 72 consecutive hours without rainfall." Which again suggests this work remains a work in progress – the next rendition of the LSS needs to incorporate this information.	The third site visit was completed following submission of the LSS in July 2024. The second LSS submission will include details related to the third site visit to ensure site conditions are accurately reflected in the baseline characterization.	Oct 2 2025	<p>Comment addressed - Appendix K includes third visit and Section 7.5.3 provides a summary of HDF assessment based on all 3 visits. Additional HDFs assessed in 2025 also included in Appendix K and Section 7.5.3.</p> <p>a) New Comment** LSS Page 82 first paragraph (following the bullets) "A management classification for each HDF reach is illustrated on Figure based on an evaluation....". Figure ID is missing here and on the figure itself.</p> <p>b) New Comment** Appendix K and the results in the LSS include "final management" recommendations as an alternative to the results provided through the application of the TRCA/CVC (2014) guidelines. These recommendations were determined based on modifiers or other considerations that include current impacts to the feature, potential future impacts of Highway 413, and previous planning decisions. The Town's review team acknowledges that the approach to provide recommendations due to site specific "modifiers" is common and typically accepted by review agencies. With that said, has the Town/TAC supported this approach?</p> <p>c) New Comment** If the above is accepted, and to avoid confusion, HDF mapping in the LSS and Appendix K should be clear that this is the final management recommendation as opposed to the "HDF Management Classifications" which suggest these are the result of the TRCA/CVC (2014) Guidelines.</p> <p>d) New Comment** Appendix B of Appendix K - are the management classifications presented in each summary sheet for the HDF Classification from the guidelines, or the recommended "final management" classification. They appear to be final management recommendations - It is suggested that the field summaries do not include the HDF classification as it is not clear whether the results of "limited", "valued", "contributing", or "important" have been applied. Furthermore, please review ALL results as there are inconsistencies between the observations made and the management classification (without modifiers) - for example, Reach AD5-Sa had "Minimal flowing water", and Reach FD1-1 had "flowing water" in the first visit and was dry in the second, and the management classification has been listed as "no management". The HDF guidelines for minimal flowing water and flowing water would result in a "contributing" hydrological function, and as a result a "mitigation" classification at the least. Reach LD4-2b and LDF-3D (and others) have similar observations and has been appropriately assigned a "mitigation" classification. Appendix C appears to provide "modifiers", but lacks the rationale as to why the modifier would change the classification. For example, with respect to AD5-Sa, it is listed as having contributing hydrology, leading to mitigation, however it is recommended to be "no management" with modifiers "agricultural field, dry during second site visit, no riparian corridor". It is not clear how these modifiers led to the change. Contributing hydrology to downstream features should be maintained through mitigation in the future.</p> <p>e) New Comment** The SWM strategy for features that have been downgraded from "mitigation" to "no management" may need to be revisited if there is insufficient rationale, and/or a lack of acceptance from the Town for these alternative, final management recommendations.</p>	<p>a) The text has been updated and figures prepared by GEO Morphix are now numbered.</p> <p>b) The inclusion of modifiers to arrive at an alternate HDF management classification is a standard approach. Based on comments received from the Town of Caledon, this overall approach is acceptable. The Town has provided detailed comments on the HDF assessment and are addressed in the third LSS submission.</p> <p>c) Figures in the LSS and Appendix N (Headwater Drainage Feature Assessment) have been updated to note final management recommendations, where appropriate.</p> <p>d) The intent of Appendix B in Appendix N is to provide a one-page summary of each reach and directly link it to the final HDF management recommendations mapping; however, for clarity Appendix B of Appendix N has been revised to note the preliminary management recommendation (i.e., without modifiers) following TRCA and CVC (2014) guidelines.</p> <p>All HDFs have been reviewed for consistency and updated, as required. Refer to Sections 7.5.3 and 7.5.4 of the LSS and Appendix N. LD4 HDF reaches were assessed as mitigation to maintain flows to the downstream wetland community.</p> <p>e) Noted. It is GEO Morphix's respectful opinion that the final management recommendations are appropriate based on detailed field observations and experience in other municipal and conservation authority jurisdictions in the Greater Toronto Area.</p>
43	Montrose Environmental	Mar 3 2025	Page 83 – Section 7.5.2 – Table 25 – for Reach LD2 it states that the information needs – "To be Updated" – when will this take place?	Data for Reach LD2 will be provided in the second LSS submission.	Oct 2 2025	Comment addressed - Detailed assessment information for Reach LD2 added to Table 23.	No action.

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44	Montrose Environmental	Mar 3 2025	<p>Page 77 – Section 7.5.2. The TOR require that reach delineations and feature types are to be confirmed and/or updated (relative to the SABE study) based on refined mapping and field investigations. The approach to confirmation of feature type is not clear within the LSS. The Headwater drainage feature assessment (HDFA) and fluvial geomorphology assessment are under separate covers and therefore discussed separately within the LSS.</p> <p>a. As part of the water resources system and drainage network, these pieces should be pulled together with definitions of each feature type (policy and guidelines), and how they were/are applied in the confirmation of feature type and reach delineation, prior to their separate discussions and analysis.</p> <p>b. It is unclear in the LSS how the reach delineation was completed for new HDF, however Appendix K briefly describes data used in the update (see comments for Appendix K below).</p>	<p>The updated LSS will better integrate the HDF and fluvial geomorphology assessments to provide clarity.</p> <p>a. Definitions for watercourses and Headwater Drainage Features (HDFs), along with supporting policy and guideline references, will be included to provide clarity on the classification of feature types. The criteria and rationale used to confirm or update feature types and reach delineations will be clearly described prior to their respective analyses.</p> <p>b. Additional detail will be integrated into the LSS document that summarizes the reach delineation approach for HDFs, including a clear explanation of how field observations and refined mapping informed updates. This will complement the supporting material in Appendix K.</p>	Oct 2 2025	<p>Comment addressed - Definitions added to Section 7.5; Reach delineation (Section 7.5.1) revised/expanded and moved above HDF and Watercourse sections.</p>	No action.
45	Montrose Environmental	Mar 3 2025	<p>Page 77 – Section 7.5.2 - HDFs may be better organized after the watercourse discussion and analysis is presented. The reach delineation section (7.5.2) speaks to watercourse reaches and could include the method or approach for HDF reaches. Allowing the report to go from the higher watercourse network level, to feature types and then the reach delineation for both.</p>	<p>The structure of Section 7.5.2 will be revised to first present the broader watercourse network and analysis, followed by a discussion of feature types and the reach delineation methodology for both watercourses and HDFs. This reorganization will improve flow and provide clarity.</p>	Oct 2 2025	<p>Comment addressed - Reach delineation (Section 7.5.1) presented before HDF and watercourse sections.</p>	No action.
46	Montrose Environmental	Mar 3 2025	<p>Page 78 – Section 7.5.2 - The reach delineation for watercourses can reference Figure 19 rather than Appendix L as it is already in the LSS</p>	<p>Noted. The reach delineation discussion for watercourses will be updated to reference Figure 19.</p>	Oct 2 2025	<p>Comment Not addressed - mostly editorial. Current references to reach figures are Figure 2 in Appendix L or generally in Appendix M. The figure in Section 7.5.4 (Figure 18) is listed in the TOC as Figure 18, but has no indicator on the figure itself, and no reference in the preceding section.</p>	Figures prepared by GEO Morphix are now numbered and text references have been updated.
47	Montrose Environmental	Mar 3 2025	<p>Page 82 – Section 7.5.2 - Detailed surveys were only completed to support design objectives, while none were completed to confirm erosion threshold verification. It is unclear how unitary thresholds were directly evaluated for applicability and appropriateness beyond assumptions of materials being hydraulically sized in receiving, designed and/or constructed channels. Though this may be clarified through updated work in Phase 2.</p>	<p>Detailed field assessments were previously completed for EM10 (Huttonville Creek), SW4 (Fletcher's Creek), MEC-05 and MEC-02 (Etobicoke Creek) as part of approved studies. CVC has confirmed that the approved erosion thresholds and unitary release rates within subwatersheds under their management are applicable and appropriate. A similar approach is being used for Etobicoke Creek. Refer also to the response to Comment 25, above.</p>	Oct 2 2025	<p>Comment addressed. Though it is recommended that Section 11.5 is referenced in Section 7.5.6 (Detailed Surveys) to provide additional context that the surveys are not to inform erosion thresholds. It is already noted that detailed surveys are for design improvements.</p>	No action.
48	Montrose Environmental	Mar 3 2025	<p>General Comment – Section 7.5.2 Updated/confirmed watercourse constraint rankings and mapping were not completed, nor discussed in any detail. This has implications on the impact assessment and management as discussed in Sections 12 and 13. There should be confirmation/update within the baseline characterization to support those subsequent phases/sections. Constraint rankings should be mapped and approved in consultation with the TAC – this will allow for a better introduction for realignment recommendations of area reaches.</p>	<p>Updated watercourse constraint rankings will be incorporated into the second LSS submission, where appropriate. A high, medium and low constraint classification framework will be used, which is consistent with methodologies used in other jurisdictions (e.g., Milton, Halton Hills and Oakville). This approach provides a clear system to evaluate reach-level fluvial sensitivity, geomorphic condition, ecological function, and the appropriateness of realignment or protection measures. A suggested constraint ranking system is outlined below, and is subject to refinement as revisions to the LSS proceed:</p> <ul style="list-style-type: none"> - Red (High Constraint): Reaches with high geomorphic sensitivity, well-established natural habitat, or significant regulatory and hazard constraints. These are generally recommended for protection in place. - Blue (Medium Constraint): Reaches with moderate sensitivity or potential for enhancement through natural channel design. These may be considered for conservation or enhancement strategies. - Green (Low Constraint): Reaches that are heavily modified or degraded and offer opportunities for realignment or removal with appropriate mitigation and/or integration into the overall corridor vision. <p>This ranking approach will be informed by results of the HDF assessments, watercourse form and function, floodplain connectivity, habitat conditions, historical alterations, and municipal drain status. Municipal drain realignments will be treated as special opportunities for restoration. In addition, the proposed Highway 413 corridor will be considered as it has the potential to significantly impact the headwaters of Etobicoke Creek.</p> <p>This approach integrates well with the TRCA and CVC (2014) HDF guidelines. Constraint rankings will be clearly mapped in the second LSS submission and reviewed in consultation with the TAC.</p>	Oct 2 2025	<p>Comment Partially addressed - Section 17.4 provides definitions for watercourse constraint rankings, preliminary constraint rankings for watercourse reaches from the Scoped SWS (Wood, 2022), and updated constraint rankings (for each discipline and overall constraint ranking). Not added to baseline characterization and no mapping of constraints provided.</p>	Watercourse constraint rankings and descriptions have been moved to Section 7.5.8 of the third LSS submission as part of the existing conditions characterization. Integrated constraint rankings are now shown on Figure 20 of the LSS.

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49	Montrose Environmental	Mar 3 2025	General Comment – Section 7.52. An analysis of erosion potential has not been completed beyond the introduction of unitary rates from previous approved or in-review studies. An existing conditions exceedance analysis has not been completed. This is required per the TOR (October 2024).	See responses to TRCA comment #1 and Montrose comments #25, #99 and #143.	Oct 2 2025	<p>Comment Partially addressed - Erosion threshold analysis and exceedance analysis included within Appendix Z. However, Existing conditions erosion thresholds and exceedances are not included within Phase 1 portion of the LSS. Rather included within Section 11.5 under the impact assessment.</p> <p>New Comment a** It is appreciated that there is acknowledgement within Appendix Z that the erosion threshold target for West Huttonville has not been accepted and is subject to refinement (Heritage Heights Phase 2), and that it should currently be considered preliminary. Similar language should be included in Section 11.5.1</p> <p>New Comment b** Appendix Z section 7, paragraph 2 "The relatively minor contributions to the three southern receiving watercourses indicate that the development of the subject lands is unlikely to alter erosion processes within Fletcher's Creek and East and West Huttonville Creek. Additionally, the receiving corridors to Fletcher's Creek and Huttonville Creek are lined with hydraulically sized substrate corresponding with post-development flows. Thus, an erosion exceedance assessment was not necessary for the Huttonville Creek and Fletcher's Creek subwatersheds." and LSS Section 11.5.1 paragraph 3 "The receiving channels for Fletcher's Creek and East Huttonville Creek consist of constructed corridors that contain hydraulically sized substrates based on post-development flows (GEO Morphix, 2024)." The reference to GEO Morphix 2024 is for the reporting presented in Appendix K - Headwater Drainage Features Assessments. Confirm (and provide documentation) that West Huttonville has a constructed corridor. Also please confirm the location and extent of these design corridors. Does the LSS team know of any "weak links" or sensitive sites along the receiving features?</p> <p>New Comment c** Please see new Hydrology comment 3, and similar to above. Please demonstrate that there are no negative impacts to erosion for receiving features of Huttonville Creek and Fletcher's Creek.</p> <p>New Comment d** Appendix Z Section 7.2, Paragraph 1 "Results over +/-5% are potentially significant enough to result in a measurable change in erosion potential within the receiving watercourse when the absolute change in the erosion metric is significant." What is considered significant for an absolute change in the erosion metric?</p>	<p>The erosion threshold and erosion exceedance assessment is contained in Section 11.5 as part of the impact assessment as it is a comparison of post-to pre-development hydrological conditions rather than part of the existing conditions characterization. Separating the erosion threshold text from the erosion exceedance text makes the related content disconnected in the document. As this is an organizational comment, it has no impact on the technical findings of the LSS.</p> <p>a) The suggested text has been added to Section 11.7.1 (formerly Section 11.5.1) of the LSS.</p> <p>b) The locations and extents of constructed corridors are described in Appendix Z based on a review of previous studies and recent satellite imagery from Google Earth Pro. Incorrect appendix references have been updated in the LSS and Appendix Z. The erosion sensitive sites along the receiving features are described in Appendix Z.</p> <p>c) Additional text has been added to Appendix Z Section 5, and in Section 11.7.1 of the LSS assessing the potential impact on the receiving features of Huttonville Creek and Fletcher's Creek.</p> <p>d) Additional text has been added to Appendix Z Section 7.2 to clarify the reference to an absolute change in pre- to post-development erosion metrics.</p>
50	Montrose Environmental	Mar 3 2025	Page 84 – Section 7.5.2 - Meander belts were empirically derived only, given the historical modification of these watercourses. However, some discussion on the use/absence of a reference reach should be included. The meander belt should be mapped and included as part of the updated existing conditions constraint mapping.	Due to the extent of historical modification within the study area, there are limited suitable reference reaches available to inform meander belt estimation. Natural meanders are present along Etobicoke Creek downstream of the Secondary Plan Area; however, several tributary inputs are present that influence meander amplitude and as such, meander belts have been empirically derived. A discussion of the rationale behind this approach, including the limited availability of appropriate reference conditions, will be added to the updated LSS. Meander belt mapping will also be incorporated into the existing conditions constraint mapping, as recommended.	Oct 2 2025	<p>Comment addressed - The absence of suitable reference reaches was added to Section 7.5.7 and Appendix M. Meander belt widths are mapped in Appendix G of Appendix M.</p>	No action.
51	Montrose Environmental	Mar 3 2025	<p>Surface Water Quality</p> <p>Page 88 – Section 7.6 – there is reference to a "Brampton Weather Underground" precipitation station – is this the correct reference? Where is this located? Also, it appears that data only through 2024 to June 20th was collected/used – this is not considered fulsome.</p>	<p>Monitoring for both water quantity and quality is ongoing and updated information will be included in the second LSS submission. The reference to the "Brampton Weather Underground" station will be reviewed and revised, as necessary, to clarify the source and accuracy of precipitation data used in the report. In support of the LSS, a robust monitoring program has been implemented as follows:</p> <p>Water Quantity Monitoring (2024): Sites: 5 locations across the Secondary Plan Area (ASW1 to ASW5) Date Range: October 23 to November 30, 2024 Instrumentation: HOBO U20 Water Level Loggers for depth and temperature (15-minute intervals)</p> <p>Water Quantity Monitoring (2025): Sites: 8 locations across the Secondary Plan Area (ASW1 to ASW8) Date Range: March 13, 2025 to present Instrumentation includes: • HOBO U20 Water Level Loggers for depth and temperature (15-minute intervals) • Greyline MantaRay Portable Level-Velocity Loggers for continuous velocity and discharge (15-minute intervals) • Discrete Acoustic Doppler Velocimeter (ADV) readings to verify velocity at established cross-sections</p>	Oct 2 2025	<p>Comment Partially addressed: Appx N notes that quantity monitoring has only considered 2 partial years, clearly additional data collection is required to meet the LSS TOR; further - no details are provided on the establishment and relative accuracy of rating curves at the monitoring locations</p>	<p>Baseline surface water monitoring will continue in 2026 to collect two full years of data. Refer to Appendix O (Surface Water Quality and Quantity) for a summary of all monitoring data completed to date.</p> <p>Stage-discharge rating curves will be presented in the revised Phase 1 EIR submission in tandem with hydrology model calibration as a more comprehensive dataset will be available.</p>

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52	Montrose Environmental	Mar 3 2025	<p>Page 89 – Section 7.6 – the text reads “Water quality sampling will continue to November 2024 to characterize baseline water quality during a variety of seasonal conditions.” – presumably these data have been collected and will be reported on in future documentation.</p>	<p>Event-based water quality sampling was completed between April and November of 2024 and is currently ongoing between April and November of 2025 to capture seasonal and event-driven conditions. A summary is provided below.</p> <p>Water Quality Sampling (2024–2025): -Sampling Frequency: 3 storm events (capturing both ascending and receding limbs) and 3 dry events, targeting one event of each per spring, summer, and fall. -Sampling Parameters: Ammonia, Anions (Nitrate, Nitrite, Phosphate, Chloride), BOD5, Conductivity, Dissolved Oxygen, Full suite of metals (including Al, As, Cd, Cu, Fe, Pb, Zn, etc.), PAHs, pH/Alkalinity, TKN, Total Phosphorus, TSS, and Turbidity</p> <p>Discrete Water Quality Measurements (2024-2025): -Collected during data logger downloads at all stations for temperature, turbidity, dissolved oxygen, and conductivity -Three additional stations (ASW6 to ASW8) were added in 2025 -Discrete discharge measurements were completed during data logger downloads between May 27 and November 30, 2024</p> <p>In 2024, baseline monitoring was initiated at 5 sites across the Secondary Plan Area (ASW1 to ASW5). In 2025, the monitoring program expanded to include three additional locations (ASW6 to ASW8). All available monitoring results will be provided in the second LSS submission.</p>	Oct 2 2025	Comment Addressed	No action.
53	Montrose Environmental	Mar 3 2025	<p>Aquatic Ecosystems Page 89 - Section 7.7.3 – the text states “Fish sampling was not completed because fish community data and thermal regime information were available through online resources (MNRF, 2024a/2024b) and from previously completed fieldwork (Beacon, 2023a, b).” – did the TAC support this approach and is this consistent with the TOR?</p>	No concern with this approach has been introduced to date.	Oct 2 2025	Guidance to Town NHS Team: need to confirm	No action. No relevant Town comments related to fish sampling below.
54	Montrose Environmental	Mar 3 2025	<p>Page 93 – Section 7.7.5 – the text indicates “Further analyses of benthic invertebrates will be included as part of a LSS report update.” – this again suggests that the current reporting is a WIP and in need of an update.</p>	Consideration of these data will be included in the updated LSS document.	Oct 2 2025	Guidance to Town NHS Team: need to confirm	No action. No relevant Town comments below, noting benthic data are included in Section 7.8.5.
55	Montrose Environmental	Mar 3 2025	<p>Terrestrial and Wetland Page 94 – Section 7.8.1 – was the field program scope agreed to with the TAC?</p>	The field program scope was completed per the scope of work outlined in the approved Terms of Reference (October 2024)	Oct 2 2025	Guidance to Town NHS Team: should review the TOR against the work documented in the LSS	Refer to Town Natural Heritage comment responses below (numerous comments) regarding scope of field program.
56	Montrose Environmental	Mar 3 2025	<p>Page 96 – Section 7.8.3 – text reads “Additional botanical field work will be continued into July, August and September 2024, with an emphasis on wetlands, woodlands, meadows and thickets and/or areas where Species at Risk (SAR) flora (e.g., black ash) and any NHIC SRank (S1, S2 and S3) vegetation communities and/or species have been observed.” – additional data from this field work will need to be considered in updated assessments.</p>	Additional field data collection and analysis was completed by Azimuth and CEA following the first submission of the LSS. Consideration of these data will be included in the updated LSS document.	Oct 2 2025	Comment Partially Addressed: Report tenses to be changed as it says “... will be ...” vs. “has been”?	Tenses have been updated in Section 7.9.3 (formerly Section 7.8.3) and elsewhere within the report, where supplementary botanical and wildlife surveys have occurred.
57	Montrose Environmental	Mar 3 2025	<p>Page 96 – Section 7.8.3 – the reference to woodland removals being supported by the Courts requires further consideration by the respective parties. In addition, the decision not to restore any of the affected areas also requires further discussion and consideration with the TAC.</p>	Acknowledged. We can provide additional Landowner history if required, however our position is that the removals were required to facilitate agricultural operation and that assertion was confirmed through the Provincial Court and the information we have provided indicates that the Town of Caledon permitted the removals.	Oct 2 2025	Comment Partially Addressed: for completeness documentation should be included	Addressed. Report text & appendix have been updated accordingly. See section 7.9.3.
58	Montrose Environmental	Mar 3 2025	<p>PHASE 1 SUMMARY AND NEXT STEPS Page 120 – Section 8 – the text clearly states that data collection is ongoing to “fill in gaps in information...” – this confirms that the report is a WIP and is in need of updating to more comprehensively consider the natural and water-based systems including updating development constraints (“... as new data becomes available”).</p>	Acknowledged. LSS has been updated with the latest information.	Oct 2 2025	Comment Partially Addressed: ref. only to data collection to 2024 - has this not been extended to present (2025)?	Addressed. Section 8.0 has been updated accordingly.
59	Montrose Environmental	Mar 3 2025	<p>General Comment - There was no dedicated section discussing the subwatershed study area’s major issues, concerns, and constraints, but some information of this kind is integrated into individual sections (e.g., Species at Risk) and a small section in the executive summary. Please provide a separate section outlining the major issues, concerns and constraints and an integrated understanding</p>	Acknowledged. A summary has been added to Section 8.	Oct 2 2025	Comment not addressed: no summary in Section 8	Addressed. Section 8.0 has been updated to provide a general summary of issues.
60	Montrose Environmental	Mar 3 2025	<p>OVERVIEW OF PHASE 2: SUBWATERSHED IMPACT ASSESSMENT Page 122 – Section 9 indicates that impacts are (were) assessed against a series of criteria – have these criteria been approved/supported by the TAC?</p>	The Terms of Reference (October 2024) were submitted to the members of the TAC and were signed off by all parties. The TOR was approved by the Town March 2025.	Oct 2 2025	Comment not addressed: question relates to criteria not the TOR	Addressed, Section 9 of the LSS notes that the impacts will be assessed against a series of criteria that have been established based upon conventional practices, governing legislation, policies and guidelines. The key criteria to be used to assess potential impacts are noted in Section 2.3 (2.3.1-2.3.6) of the TOR which was reviewed and approved by all TAC participants. To date, no issue with the criteria used has been identified.

RESPONSE MATRIX TO SECOND SUBMISSION (August 2025) COMMENTS - SCOPED TO SUBWATERSHED STUDY COMMENTS ONLY Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)							
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61	Montrose Environmental	Mar 3 2025	LAND USE PLANNING PROCESS <u>Proposed Alloa Secondary Plan</u> Page 122 – Section 10.1 – the influence of the SSA on potential uses in the PSA also needs to be considered as a landscape scale assessment can define such elements as linkages and corridors.	Acknowledged.	Oct 2 2025	Comment not addressed: from response unclear if/how this was done? Also note that Hwy 413 planning has proceeded to 90% design and the SWM report is available - implications on site and water management need to be considered	The design of the (now approved) Alloa Secondary Plan is in part based on Future Caledon mapping, which identifies preliminary linkages and corridors to accommodate external NHS features. The design of the Alloa Secondary Plan is further based on the boundary limits and required infrastructure of Highway 413. Greater review of the (now designated) Highway 413 corridor and infrastructure will be reviewed through the subsequent Alloa Phase 1 Tertiary Plan process.
62	Montrose Environmental	Mar 3 2025	Page 122 – Section 10.1 – this section notes that the "... enhanced Natural Heritage System requirements was confirmed". This statement is unclear in the context of an active LSS through which a NHS and WRS are intended to be advanced and endorsed – some clarity is required around this wording.	Section 10.1 has been updated accordingly. The intent of this wording was to show that through the work completed in Phase 1, limits of the NHS were confirmed helping to establish the Land Use Plan.	Oct 2 2025	Guidance to Town NHS Team: Town's NHS reviewers should consider	Addressed. Revised wording has been provided in Section 10.1.
63	Montrose Environmental	Mar 3 2025	Page 123 – Figure 21 – it is unclear whether the proposed Secondary Plan has followed the iterative land use planning process outlined in the reporting and TOR? Further details are required.	Development of the Secondary Plan involved input from all Landowner Group consultants and collaboration with the Town of Caledon. Several iterations of the Secondary Plan were considered by the Town and Landowners before arriving at the Secondary Plan version used as a basis to confirm proposed land uses in the LSS.	Oct 2 2025	Comment partially addressed: iterations of LU plan should be documented and changes related to the approved SP documented	Please refer to previous versions and submissions of the LU plan provided by GSAI. Comments and adjustments have been made based on stakeholder input throughout the process.
64	Montrose Environmental	Mar 3 2025	Page 124 – Section 10.1 – has the conversion of the School to an Operations Center been confirmed?	Per comment received from the Town's Capital Projects reviewer: "The Town intends to utilize the Town lands along Mayfield Road for a future public works yard"	Oct 2 2025	Comment Addressed - should this quote from the town be documented in the LSS?	Verbiage has been updated in Section 10.1 to reflect this usage.
65	Montrose Environmental	Mar 3 2025	Page 124 – Section 10.1 – locating formal SWM systems which require active O&M in a protected NHS is not supported unless it can be demonstrated that there will be no long-term impacts.	Acknowledged.	Oct 2 2025	Comment partially addressed: LSS continues to make reference to accommodating Regional Storm conditions in NHS - if this infers controls then this would be an issue in terms of this response	The LSS is not proposing to locate infrastructure or SWM controls within the NHS. Section 10.1 is simply noting that stormwater management facilities are an allowable use within the NHS, if necessary.
66	Montrose Environmental	Mar 3 2025	Transportation Network Page 125 – Section 10.2 – what work was done in relation to minimizing crossings of the natural areas?	Impacts to Natural Heritage systems have been minimized where possible while also respecting transportation design guidelines, best practices, and public safety. Section 10.2 has been reworded accordingly.	Oct 2 2025	Comment not addressed: it is unclear from the information provided as to what work was done to minimize the impacts of crossing per the statement "When crossings were required, they were conceptually located in areas that minimized impacts"? This needs to be incorporated into LSS	Addressed. Further detail has been provided in Section 10.2 of the report.
67	Montrose Environmental	Mar 3 2025	Page 128 – Section 10.4.2 – the approach to establishing the "Enhanced NHS" is considered out of phase in this study process as it needs to build from the existing understanding of significance (which as noted is not yet completed due to ongoing field work/data collection and assessment) and then tested through a variety of land uses and impact assessments, in order to derive a preferred NHS and WRS. The work discussed under this section is hence considered premature and not adequately supported by the work documented in this LSS.	Further field studies and consultation with stakeholders following the first submission of the LSS have been completed to refine and finalize the Enhanced NHS. Specifically, extensive consultation with Town and agency staff has occurred to refine appropriate and acceptable ecological buffers, revised Regional flood lines, road crossings (including grading limits), areas of restoration, and special study areas. Through the Second Submission of the LSS, the Enhanced NHS has been finalized.	Oct 2 2025	Guidance to Town NHS Team: the NHS will/may require refinement through the MESP/FSRs/EIRs - hence should be considered proposed/recommended rather than "final"	Addressed. Additional text to clarify has been added in 10.4.2.
68	Montrose Environmental	Mar 3 2025	Terrestrial/Natural Heritage System <u>Page 128 - Section 10.4.2 – the background to the proposed buffers (10m and 30m) needs to be documented.</u>	The 10 m and 30 m buffers that were used preliminarily were based on typical buffers for various features. These have since been confirmed through further field studies and discussion with agency staff.	Oct 2 2025	Guidance to Town NHS Team: OK - notes that buffers will be finalized through next stage of studies	No action.
69	Montrose Environmental	Mar 3 2025	Page 128 – Section 10.4.2 – the rationale for proposed removals of natural features needs to be documented.	Significant restoration initiatives of the Alloa Secondary Plan will include the creation of approximately 6,800m of new natural channel, a 200% increase in natural cover, and 3.5ha of constructed wetland to address offsets for removed wetland and to provide net increase in overall wetland area	Oct 2 2025	Guidance to Town NHS Team: while laudable - this response does not address the question as related to the rationale for feature removals?	Addressed. The removal of these features is necessary for a complete and efficient Land Use Plan with a variety of land uses, a complete and practical transportation network, and efficient and practical servicing infrastructure. As noted previously, the recognition of these removals is noted (within Section 10.4.2), calculated and compensation is provided as shown on Figure 25A - Natural Heritage Removals. Although some feature removal has occurred historically or is required for road crossing or watercourse realignment, a proposed increase in natural cover and creation of new natural channel through compensation and restoration creates net increases in both wetland and woodland area.
70	Montrose Environmental	Mar 3 2025	Page 129 – Figure 23 – the western portion of the plan requires coordination with the on-going Heritage Heights LSS in Brampton in terms of adjacent land uses and potential linkages.	Acknowledged.	Oct 2 2025	Comment not addressed: not clear from Fig 22 as to how this plan reflects on-going work in HH?	Linkage to the south Heritage Heights Subdivision is acknowledged and a linkage opportunity has been provided for within the Alloa Land Use Plan. See Figure 25B .
71	Montrose Environmental	Mar 3 2025	Page 130 – Section 10.4.2 – a more detailed accounting of features lost and restoration needs to be provided.	Acknowledged. LSS has been updated with updated information on features to be removed. Restoration plan areas have been updated accordingly.	Oct 2 2025	Comment Partially Addressed: no report reference as to where this has been documented?	Addressed. Section 10.4.3 has been added to provide clarity.
72	Montrose Environmental	Mar 3 2025	Page 130 – Section 10.4.2 – why are roads planned to be flood free for the Regional Storm – as long as there are no adverse upstream impacts and if the depths and velocities allow for safe access, it is expected that the designs will meet provincial requirements.	For urban cross-sections, overtopping is not typically acceptable to local municipalities.	Oct 2 2025	Comment addressed	No action.

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73	Montrose Environmental	Mar 3 2025	Page 131 – Section 10.4.2 – what is the source of the designation of the Special Study Areas? The section notes further study over 2024 which will inform the wetland status – this information needs to be included in a future update of the LSS. In terms of Special Study Area #3 – it is unclear why “The extent to which impacts to the existing wetland feature cannot be ascertained until detailed design is undertaken” – this information should be collected now as part of the LSS so that more informed decision making is possible.	Wetland #7 (Alloa Drain) was subject to re-evaluated under Ontario Wetland Evaluation (OWES) system in November 2024 and determined to be non-significant. The OWES evaluation has been appended to the second submission of the LSS. A wetland boundary adjustment shapefile and confirmation of status (non-significant) was submitted to the Ministry of Natural Resources (MNR) on November 22, 2024. A minor boundary adjustment for Wetland #6 (PSW) was also submitted to the MNR on November 22, 2024.	Oct 2 2025	Guidance to Town NHS Team: has MNR responded? Given uncertainty noted in roadway planning and land uses - are there potential impacts or a need for contingencies?	Azimuth received an acknowledgement email on November 26, 2024 to verify the information has been received. The revised boundary and non-significant status currently appear on the NHIC Make-a-Map platform.
74	Montrose Environmental	Mar 3 2025	Conceptual Natural Channel Design Summary Pages 133-136 – Figures 24 to 27 – has the approach to co-locate HDF in regulated watercourse valleys been supported by the TAC?	The proposed approach is consistent with that used in other jurisdictions. This approach enhances overall functionality of the corridor by consolidating drainage features within a connected system. It supports more natural flow routing, improves opportunities for riparian enhancement and ecological connectivity, and makes better use of the available corridor space. By designing within a broader corridor context, the overall resilience and function of both the watercourses and HDFs are improved. The Consultant Team has not received comments specific to the natural corridor design and it is expected this will occur as the Town and regulatory agencies review the second LSS submission and as part of TAC meetings that are anticipated as part of the review process.	Oct 2 2025	Comment partially addressed: this approach has not been supported by the TAC and is pending review The Town's peer review team can support this for 'conservation' reaches that connect to mitigation or no-management features upstream. The Town's peer review team will defer comment on the inclusion and realignment of HDFs within design corridors to the appropriate to the town.	It was confirmed at the virtual meeting on November 11, 2025 attended by Cassie Schembri (Town of Caledon), Jason Elliot (Town of Caledon), John McDonald (Montrose Environmental), Mariëtte Pushkar (Montrose Environmental), Paul Villard (GEO Morphix) and Suzanne St Onge (GEO Morphix) that the Town can support relocating Conservation HDFs within realigned corridors.
75	Montrose Environmental	Mar 3 2025	Page 147 – Section 10.5.1 – the rationale for removal of wetlands needs to be more clearly articulated prior to outlining proposals to replicate them. The same section indicates that more field data are being collected over 2024 – hence any decision making in this regard is premature until these data have been collected and properly assessed. Also – has the TAC agreed to a 1:1 area replication? Past experience has shown that regulators seek to increase the wetland areas of compensation systems due to the near-term loss of maturity and function.	Additional wetland data was collected following submission of the LSS in July 2024 that has resulted in revisions to the proposed development plan in the northeast corner of the Secondary Plan Area. Realignment of the Alloa Drain tributary is no longer proposed due to the provincial status of Wetland No. 6; however, it is assumed that a portion of this wetland will be impacted by the implementation of Highway 413.	Oct 2 2025	Comment partially addressed: text notes that CVC is in agreement with 1:1 replication ratio - please include documentation of this - need to discuss with Town given CVC's modified role in natural systems planning	Section 10.5.5 of the second LSS submission summarizes the wetland replication proposed to address a violation at 1850 Mayfield Road, wetland removed due to proposed road widening and due to the Alloa Drain realignment. Documentation for the 1850 Mayfield Road violation is included in Appendix Y
76	Montrose Environmental	Mar 3 2025	General Comment - Section 10.5 – It is appreciated that a lot of good work has been completed in the development of conceptual natural channel designs. The focus of the Phase 1 study should be to develop vision for the channel corridor in which the new channels would be situated (i.e., corridor siting and sizing). The concept natural channel designs should be presented as recommendations; review of design parameter appropriateness is deferred to detailed design submission. .	Thank you for acknowledging the extent of work completed to date in developing the conceptual natural channel designs. We appreciate the recognition of the effort invested in creating a functional and integrated vision for the Alloa Drain and its associated tributaries. We acknowledge and agree that the primary purpose of the LSS is to establish an overarching vision for corridor siting and sizing. While the conceptual designs include a greater level of detail than is typical for a LSS, this was intentional given the complexity of the channel realignments, the need to demonstrate that natural hazards can be addressed. We respectfully suggest that the detail provided is appropriate and helpful in advancing a defensible and functional corridor strategy. Final design parameters and implementation details will be addressed during subsequent planning stages, including the FSR and detailed design submissions.	Oct 2 2025	No action. However, the Town's peer review team only provided comments on the conceptual design at a high level.	No action.
77	Montrose Environmental	Mar 3 2025	IMPACT ASSESSMENT Hydrogeological General Comment - There is no specific section on groundwater budget model; while there are elements of a groundwater budget model discussing recharge and discharge rates this work does not really address changes in groundwater storage.	Understood. The LSS has been updated to discuss recharge and discharge in more detail.	Oct 2 2025	*Comment Partially Addressed* See comment 10 in Baseline Inventory. With the new submission of data there are new comments related to the recharge/discharge area characterization. As per TOR Section 2.2.3, refinement of recharge/discharge areas is a requirement.	Addressed. Recharge/discharge areas have been specified. Refer to Section 7.1.8.11 - Recharge and Discharge of the LSS.
78	Montrose Environmental	Mar 3 2025	Page 150 – Table 41 – this seems out of place in the Hydrogeology section as it provides details on all discipline's environmental factors. Also – it is unclear why drainage density is being considered an evaluation factor given the more contemporary advent of HDF classifications and management.	Noted. This is was a formatting error and has been revised in the updated LSS	Oct 2 2025	*Comment Addressed*	Addressed. No action.
79	Montrose Environmental	Mar 3 2025	Page 152 – Section 11.2.1 – the text indicates that “at the time of this report detailed post-development catchments were unavailable ...” – this information is required rather than the over simplification of a 25% change. This is considered a procedural short-coming.	Understood. The post-development catchments have since been prepared and the wetland water balance risk assessment has been updated accordingly.	Oct 2 2025	Comment Partially Addressed In Appendix Y (Evaluation of Hydrologic Change to Wetlands) the post-development catchments areas for all wetlands are still prescribed a fixed 25% reduction in catchment area (as compared to the pre-development) which sits exactly on the edge of a medium-high magnitude change. Clarifying text should be added justifying this simplification in the post-development catchment area calculation, as this is not discussed in the “Assumptions” subsection of the Wetland WB Risk Assessment. The justification should include implications on proposed management options.	Addressed. An old version of the wetland water balance risk assessment PDF had been included with the previous submission. The updated risk assessment has been included within Appendix Z (Wetland Water Balance Risk Assessment) with revised post catchment area reductions.
80	Montrose Environmental	Mar 3 2025	Page 153 – Section 11.2.1 – text notes that “...flora and fauna surveys are ongoing and the ecological sensitivities may change pending the results” – surveys need to be completed and assessments updated accordingly.	Understood. The surveys have since been completed and the wetland water balance risk assessment has since been updated within the LSS.	Oct 2 2025	*Comment Addressed*	Addressed.
81	Montrose Environmental	Mar 3 2025	Page 157 – Section 11.2.3 – further details on impacts and mitigation are required based on the report stating that the Alloa lands are mapped atop a highly vulnerable aquifer.	Acknowledged. Further discussion has been provided on protection of the highly vulnerable aquifer and mitigation efforts to ensure UDs, stormwater management does not impact the highly vulnerable aquifer. It should be noted that the highly vulnerable aquifer on the site is interpreted to refer to the deep aquifer, the Oak Ridges Moraine Aquifer. On the site, the Oak Ridges Moraine Aquifer is estimated to be below 255 masl and is covered with approximately 20 m of fine-grained and dense materials. Impacts to the highly vulnerable aquifer from the proposed development is anticipated to be minimal.	Oct 2 2025	*Comment from Hydrogeology Team - partially addressed comment* In the new comments provided by Hydrogeology Team (Rows 285 - 301) we note that the claim “20m of Halton Till” is made throughout the LSS however the source of that information is never cited. The LSS team often states that the characterization is based on local datasets over regional counterparts, however in the case of the Halton Till thickness, there are no local datasets available to support that claim as the maximum drilled depth from all all boreholes was 10m. As such, we recommend providing disclaimer text around the “20m of Halton Till” that contextualizes the uncertainty associated with this regional information.	Addressed. References to OGS Mapping and MECP Wells included in Section 7.1 and associated subheadings. The claim of 20 m of Halton Till has been removed and a range of depths of overburden has been included from well records and OGS mapping.
82	Montrose Environmental	Mar 3 2025	Page 157 – Section 11.2.4 – as noted earlier the proposed approach for Site Water Balance is not supported nor consistent with the TOR hence needs to be updated.	The site wide water balance has been updated within the LSS using a modelling approach using VO. The assessment notes a deficit of 2,226 m3 within the Etobicoke Creek area and 1,231 m3.	Oct 2 2025	Comment Partially Addressed: Please see comments below regarding the VO Modelling	No action.

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83	Montrose Environmental	Mar 3 2025	Page 157 – Section 11.2.4 - Crozier claims that the proposed development has the potential to reduce infiltration by 60%, but does not mention any plan for implementing the strategies (LID measures, greenspaces, green roofs, tree pits etc.) in this section to address this reduction. Please provide additional detail as to how this reduction will be achieved, in this section.	The site wide water balance has been updated within the LSS using a modelling approach and further details on recommended LIDs have been provided. URBANTECH: A high level water balance mitigation strategy has been included in the LSS. Potential infiltration locations have been assessed at a high level based on groundwater monitoring data for the subject site.	Oct 2 2025	Comment Partially Addressed: Please see comments below regarding the VO modelling and assessment of the LID strategy	No action.
84	Montrose Environmental	Mar 3 2025	Page 158 – Section 11.2.5 discusses some climate considerations and makes statements that there could be an increase in groundwater discharge to wetlands and other surface water features during wet seasons, and could lead to periodic pooling, increase in wetland depth etc. The impacts are reversed during dry seasons. Crozier claims that this could all impact the functioning of stormwater management features in place, but does not at all address how those impacts to LID measures could be mitigated. Crozier also notes that infrastructure could interact with groundwater, however, fails to provide context. Additional details are required.	Noted. Additional details have been provided within the LSS related to mitigation strategies for the site wide water balance. It is not anticipated that there will be hydrologic impacts to the wetlands due to the Alloa Secondary Plan development.	Oct 2 2025	Comment partially addressed: is the town supportive of "It is recommended that rooftop drainage from the low density residential areas be diverted to a rooftop drainage collector and directed to the wetlands to maintain their hydroperiods, as required"? See additional comments below regarding site-wide water balance assessment and recommended LID capture.	Acknowledged. Recommendations for rooftop drainage have been removed from the LSS.
85	Montrose Environmental	Mar 3 2025	Page 158 - Section 11.2.5 - Crozier alludes to the fact that the groundwater discharge and recharge may affect wetland depths which would in turn result in affecting species within the wetlands but the report does not have a section written that directly addresses this concern or clarifies how it would affect ecosystems and the flora/fauna within the affected wetlands. Details should be provided.	Additional detailed are provided within the LSS. The wetland depths are proposed to be maintained post development and therefore no impacts to species are anticipated.	Oct 2 2025	*Comment Addressed*	No action.
86	Montrose Environmental	Mar 3 2025	Page 177 - Table 49 summarizes the land use plan and strategies from the sections above, but there are only limited strategies discussed in this document, and most are suggestions with no further details.	The strategies discussed in the LSS are recommendations based on the existing conditions report. Further details have been provided in the LSS but it should be noted that the LSS is to guide development within the Alloa area and actual mitigation methods and strategies to be used are prescribed at the Draft Plan level of planning and detailed design.	Oct 2 2025	Comment not addressed: there is an expectation of at least a minimum amount of guidance in the LSS - to be discussed with TAC	Addressed. Guidance on mitigation methods and management strategies are provided in Section 18.1.1.
87	Montrose Environmental	Mar 3 2025	Hydrology and Hydraulics General Comment - The LSS and FSR note that hydrologic analyses have been completed using the Visual OTTHYMO (VO) software, and further note that the VO model was used as this represents the currently approved hydrologic model from TRCA. The VO model for the Etobicoke Creek Watershed was specifically developed for synthetic design storms, and not for continuous simulation for erosion assessment and/or water balance assessments. Further, the Terms of Reference state that the hydrologic model is to be locally calibrated, and is required to provide a physical representation of surface runoff, baseflows, and surface water/groundwater interactions. Additional information is required within the LSS to support the selection of the VO model for the suite of hydrologic analyses per the Terms of Reference. Additional information is likewise required to support the model selection within CVC jurisdiction, as the LSS does not provide any details in this regard.	As per recent meetings including various agencies on April 23, 2025 and April 29, 2025, it was agreed that a sensitivity analysis is to be completed for the continuous hydrology model until sufficient monitoring data is available for model calibration. As discussed, it was agreed that the sensitivity analysis would assess hydrologic impacts for the continuous model by evaluating a minimum and maximum range for certain hydrologic parameters. Certain results, such as runoff coefficient, from the sensitivity analysis have also been compared to other studies to confirm that the minimum and maximum ranges established as per the sensitivity analysis, are suitable.	Oct 2 2025	Comment partially addressed. See comments below regarding the sensitivity analysis memorandum. Hydrologic analyses within CVC jurisdiction remain outstanding. MTO SWM reports are now available and should be considered - timing effects should be considered in design	As per Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS), a downstream evaluation for the lands draining to Fletchers creek has been completed. Additional model verification (HSP-F) will be completed through the block plan / draft plan stage and updated at detailed design (as agreed with CVC). The targets from the HFSWS have been used and it will be required that the future pond blocks be sized appropriately to meet the targets. The MTO ponds have been considered and their latest study indicates that they will apply the targets in the ECHUS study, which is what was assumed in Section 3.3.3 of the Scoped Servicing Study (provided in Appendix K of the LSS).
88	Montrose Environmental	Mar 3 2025	General Comment - The LSS should include recommendations regarding the specific type of stormwater management facilities recommended for the different types of development. These recommendations should be confirmed with the Town of Caledon, to confirm that any recommendations for underground facilities (i.e. oil/grit separators, underground storage tanks, etc.) are aligned with the Town's practices for assumption and asset management, and with the Town's CU-ECA requirements.	High level recommendations for types of SWM facilities based on type of development has been provided in the LSS.	Oct 2 2025	Comment partially addressed; see comments below regarding CU-ECA requirements	Acknowledged.
89	Montrose Environmental	Mar 3 2025	Page 158 – Section 11.3.1 – has the hydrology and SWM for Hwy 413 been considered in the assessment? Also, there needs to be a future land use scenario without SWM in order to determine the efficacy of proposed management.	To-date, the MTO has not provided SWM reports for HWY 413. No information on ponds has been shared or agreed upon by MTO (release rates, etc.). We expect that MTO will be required to design their ponds to meet pre-development flow rates at discharge points, so we do not anticipate any impacts to Alloa. As such, the hydrology and SWM for Hwy 413 has not been included in our hydrology analysis (we are assuming that MTO will match pre-development flow rates). Future land use scenarios will be contemplated on a property-by-property basis at detailed design depending on the status of the highway. If required, private-side swales may be considered to divert external flow to NHS watercourses (on an interim or ultimate basis). We do not expect there will be any impact to hydrology.	Oct 2 2025	Comment not addressed: MTO reports are now available and should be considered - timing effects should be considered in design	As per Section 3.3.3 of the Scoped Servicing Study (provided in Appendix K of the LSS), the MTO ponds have been considered and their latest study indicates that they will apply the targets in the ECHUS study, which is what the LSS assumed. A "no SWM" scenario was completed for the Regional storm.
90	Montrose Environmental	Mar 3 2025	Page 159 – Table 45 – frequency flow results need to be reported in the LSS per the TOR.	A continuous model was not used to establish the hydrology and SWM criteria for the subject lands - the targets were established in the Etobicoke Creek Hydrology Study and the Visual OTTHYMO model provided by TRCA was used as the basis for this work. A separate frequency analysis was completed to evaluated the results of the sensitivity analysis, but the modelling for SWM facilities and the NHS sizing was completed with design storms (including the Regional storm).	Oct 2 2025	Comment not addressed: MTO SWM reports are now available and should be considered - timing effects should be considered in design	As per Section 3.3.3 of the Scoped Servicing Study (provided in Appendix K of the LSS), the MTO ponds have been considered and their latest study indicates that they will apply the targets in the ECHUS study, which is what the LSS assumed. A "no SWM" scenario was completed for the Regional storm.

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Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)							
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91	Montrose Environmental	Mar 3 2025	Page 159 – Section 11.3.1 – the hypothesis discussed following Table 45 needs to be numerically tested, in order to be supported – this needs to be part of the LSS.	SWM controls, including Regional control, have been modelled and assessed in Section 11.3.1 of the LSS in order to demonstrate that the proposed SWM controls will mitigate any increase in peak flows resulting from the subject development.	Oct 2 2025	Comment not addressed: MTO reports are now available and should be considered - timing effects should be considered in design	As per Section 3.3.3 of the Scoped Servicing Study (provided in Appendix K of the LSS), the MTO ponds have been considered and their latest study indicates that they will apply the targets in the ECHUS study, which is what the LSS assumed. A "no SWM" scenario was completed for the Regional storm.
92	Montrose Environmental	Mar 3 2025	Page 159 – Section 11.3.2 – why has the proposed corridor been sized for uncontrolled flows? LSS needs to provide the rationale. The same applies to Section 11.3.3 whereby it is stated that the crossings are being designed for uncontrolled flows.	The corridor has been sized to accommodate the uncontrolled Regional flow. The TRCA requires that floodplain modeling should assume uncontrolled flows unless stormwater management (SWM) facilities are constructed, publicly assumed, and permanently maintained. This approach is outlined in the TRCA's Stormwater Management Criteria (2012), which states: "SWM controls must be assumed only if their effectiveness and maintenance are guaranteed in perpetuity. Otherwise, uncontrolled conditions must be simulated to assess flood risk." This principle aligns with the Technical Guide: River & Stream Systems: Flooding Hazard Limit (MNR, 2002), which emphasizes modeling based on existing conditions unless permanent control measures are in place.	Oct 2 2025	*Comment Addressed*	No action.
93	Montrose Environmental	Mar 3 2025	Page 163 – Section 11.3.4 – this section describes the background to loss of riparian storage and rationalizes the approach on the basis of channel design efficiency and presence of dead storage; it is unclear if TRCA is supportive of this approach and further whether other approaches such as the use of hydraulic 'speed bumps' or other storage compensation measures have been explored? Further consideration of these points and others is required going forward. In addition, the assessment needs to consider the full range of flows (2 year to Regional Storm).	Based on the changes discussed with TRCA staff through meetings and workshops in 2024 and 2025, namely application of the 1D, unsteady state HEC-RAS model and adjustment of Manning's roughness values, the proposed change in riparian storage is minimal. It has been agreed with TRCA to increase the channel block by 10m (bottom width) to provide additional storage. The net impact of the change in storage has no (significant) impact on the routing of flows and will not affect the general relationship between flood storage and discharge. The assessment has been completed for the full range of flows.	Oct 2 2025	Comment not addressed: MTO reports are now available and should be considered - timing effects should be considered in design	Urbantech met with TRCA and Town staff in December 2023 to discuss and agree to the approach for modelling and maintaining storage west of Mississauga Road. It was demonstrated in the LSS/SSS that loss of >200,000m3 of storage had no appreciable impact on downstream flows. TRCA has no further comments on this. The historical correspondence between TRCA/Town and Urbantech regarding the modelling approach is included in Appendix C of the Scoped Servicing Study (refer to Appendix K of the LSS to find the SSS). The full range of flows was evaluated for riparian conditions as per Sections 4.1.2 and 4.2.3 of the Scoped Servicing Study. The MTO ponds have been considered and their latest study
94	Montrose Environmental	Mar 3 2025	General Comment - Section 11.3 of the LSS provides the results of the impact assessment for future land use conditions, however defers sizing of stormwater management facilities to subsequent studies (i.e. FSR). As noted previously, the sizing of stormwater management facilities is specifically required per the LSS Terms of Reference, and represents a fundamental component to the study recommendations to clearly demonstrate that all impacts to flooding and erosion are mitigated by the recommended stormwater management plan. Furthermore, the locations for comparing peak flows are limited to three sites (i.e. Mississauga Road, Creditview Road, and Chinguacousy Road). The hydrologic analyses should include comparison of flows at all drainage outlets for the Secondary Plan Area, including those within CVC jurisdiction, and should include verification that the stormwater management facilities provide adequate capacity for the 100 year and Regional Storm events as appropriate. Furthermore, and per the Provincial Planning Statement, the Town of Caledon has been identified as a fast-growing community, hence the hydrologic analyses should be completed on a watershed scale, comparing peak flows at all key locations to the outlet of the Etobicoke Creek Watershed. This is particularly important to clearly demonstrate that the recommended stormwater management plan would not increase peak flows at downstream flood vulnerable areas (FVAs), and that the proposed development with management recommendations would not increase flood risk at these locations.	All drainage outlets from the subject lands have now been included in the flow summary. The proposed SWM strategy for the subject lands involves ensuring existing flows at Chinguacousy Road are not exceeded. An additional downstream node has been added to the analysis to demonstrate that timing effects are not significantly affected. In general, if the peak flow at Chinguacousy Road is matched / reduced, then all the downstream flows will be reduced (assuming similar peak flow timing / addition downstream). It is not necessary to evaluate flows at the outlet of Etobicoke Creek to Lake Ontario, since the LSS demonstrates no negative impact to flows and timing immediately downstream of the subject lands.	Oct 2 2025	Comment not addressed. Peak flow comparisons at all key downstream nodes should be included in the LSS, to clearly demonstrate that the stormwater management strategy achieves the requisite post-to-pre control at downstream locations, and should include details regarding the storage volumes required for the stormwater management facilities. This is of particular importance, given the damage centre downstream.	As per Section 3.3.4 of the Scoped Servicing Study (provided in Appendix K of the LSS), the downstream analysis was extended to evaluate flows all the way downstream to the QEW. The Downstream Capacity Analysis memos for both Etobicoke Creek and Fletcher's Creek are included in Appendix C of the Scoped Servicing Study, for reference. The storage/discharge tables for the proposed SWM ponds are included in Section 3.5.2 of the Scoped Servicing Study (provided in Appendix K of the LSS).
95	Montrose Environmental	Mar 3 2025	Fluvial Geomorphology Section 11.4 - Impact assessment focuses on erosion mitigation based on unitary erosion threshold targets from previous or ongoing studies. Mapping should identify specific locations for these unitary rates, and evaluate whether there is potential beyond design/constructed features for excess erosion potential.	The unitary rate for a given reach is derived based on the catchment area for a node located in that respective reach. Unitary rates were previously approved by CVC and TRCA. Mapping will be provided in the second LSS submission to ensure that all locations for erosion thresholds and unitary rates are presented. Refer also to response to TRCA comment #1, Montrose comments #25, #47, #99 and #143 that also relate to the overall erosion mitigation assessment approach.	Oct 2 2025	Comment addressed regarding locations of previous erosion thresholds shown on Figure 4 in Appendix L. See response to Comment 49 re: erosion thresholds	The downstream analysis was extended to include downstream nodes to QEW. The storage/discharge tables are included in the LSS and SSS.
96	Montrose Environmental	Mar 3 2025	Section 11.4 - Field verification for recently reported values (e.g., Heritage Heights) should be completed as appropriate.	LSS work within the Heritage Heights planning is being undertaken by others, including ongoing field verification work. Notably, the portion of drainage area associated with West Huttonville Creek is relatively small and no SWM Ponds are proposed to discharge to this subwatershed. Refer to response to TRCA comment #1, Montrose comments #25, #47, #99 and #143 that also relate to the overall erosion mitigation assessment approach.	Oct 2 2025	Comment Partially Addressed: See response to Comment 49.	See response to Comment #49

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97	Montrose Environmental	Mar 3 2025	Section 11.4 - Impact assessment should consider watercourse reach constraints (i.e. high, medium), to provide the support for electing sites for realignment and natural channel design	<p>Reach-based watercourse constraints will be used to inform the impact assessment and guide recommendations related to realignment and natural channel design. As noted in Comment 48, a reach-scale classification system that integrates physical sensitivity, channel condition, geomorphic function, municipal drain status and any modifiers (e.g. potential impacts from Highway 413) will be used to assign a constraint ranking (e.g., high, medium, low).</p> <p>By integrating this approach with the HDF management recommendations, we are able to provide consistent and defensible recommendations across the entire drainage network. These constraint rankings will be used to directly inform the selection of reaches for protection, restoration, or realignment, and will be included as part of the updated impact assessment in the second LSS submission.</p>	Oct 2 2025	Comment Partially addressed - Watercourse constraint rankings not discussed in Impact Assessment Section 11.4. Watercourse constraints provided in Section 17.4 (Phase 3 - Management, Implementation and, Monitoring).	The watercourse constraint rankings are now discussed in Sections 7.5.8, 11.6 and 17.5 of the LSS.
98	Montrose Environmental	Mar 3 2025	Section 11.4 - Erosion hazards in the subwatershed study are directly related to natural channel designs and the sizing of channel blocks, and were included within the natural heritage system update. No discussion on impacts to erosion hazards was completed. Discussion of natural channel design should be framed as recommendations with guidance for detailed design that is proposed in the future as part of the subsequent planning process.	<p>Erosion hazards have been considered in the conceptual design process and are addressed through the application of natural channel design principles. The Fluvial Geomorphology Assessment (Appendix L of the LSS) includes discussion of meander belt widths, planform geometry, and corridor sizing, which have been used to inform the preliminary design of the realigned channels.</p> <p>These elements provide the basis for defining erosion hazard limits and demonstrate how the proposed realignments mitigate potential erosion risks. We acknowledge that the level of detail presented exceeds what is typically included at this stage; however, this was intentional due to the planning timelines and complexity of the Alloa Drain system. The natural channel designs are provided as functional concepts that illustrate how hazard considerations can be addressed while also meeting broader ecological and hydraulic objectives.</p> <p>Further refinement and confirmation of erosion hazard limits and natural hazard mitigation will be undertaken through detailed design.</p>	Oct 2 2025	Comment Not addressed - No discussion within the Impact Assessment Section 11.4 regarding erosion hazards and setbacks. Corridor sizing/meander belts for designed channels provided in Appendix M. Please refer to Comment 142 for specific comments regarding the natural channel design.	Technical details regarding the corridor sizing and meander belt width calculations were not provided in the main body of the LSS to limit repetition. Section 10.5.3 has been added to provide a summary of corridor requirements and link it to additional text in Impact Assessment in Section 11.6 regarding erosion hazards and setbacks.
99	Montrose Environmental	Mar 3 2025	Section 11.4 - Pre- to post-continuous erosion analysis were not completed.	Pre- to post-development erosion exceedance analysis was completed for Etobicoke Creek as part of the Phase 1 EIR, and will be updated and included in the second submission of the LSS. The analysis uses erosion thresholds that were determined through the Mayfield West Phase 2 Secondary Plan CEISMP (AMEC, 2014) and have been evaluated and assessed to be appropriate for the current study. Also refer to responses to Montrose comments #25, and #143.	Oct 2 2025	Comment partially addressed - Pre- to post-development erosion exceedance analysis for Etobicoke Creek added to Section 11.5. Please refer to Comment response 25 (above) additional H&H comments below that should be addressed.	Please refer to responses provided above (Comment#25) and below (re: H&H)

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100	Montrose Environmental	Mar 3 2025	Section 11.4 –TOR states “Based on the results presented in Phase 1, identify which watercourses and headwater drainage features (HDFs) in the proposed development area are stable and have sufficient conveyance capacity, and which watercourses and headwater drainage features need restoration or alteration through the application of natural channel design principles.” This was not explicitly completed in the impact assessment.	The process of identifying which watercourses and headwater drainage features (HDFs) are stable, have sufficient conveyance capacity, or require restoration or alteration through the application of natural channel design will be addressed through the resubmission and the responses to erosion mitigation-related comments. While this information is currently embedded within the geomorphic assessments and conceptual design work, we agree that an explicit summary will be valuable. The second submission of the LSS will include a table and additional content, as needed, that clearly classifies all watercourse and HDF reaches based on their assessed stability, conveyance capacity, and the recommended management strategy. This classification will be supported by a constraint ranking approach that integrates geomorphic and ecological criteria and builds upon the HDF management strategy. Refer to Montrose comment #48 for a suggested constraint ranking framework that is subject to refinement as the LSS proceeds.	Oct 2 2025	Comment Partially addressed. The response Sections 11.4 and 11.5 only provide a general overview of the impact assessment. With respect to HDFs, they are broadly evaluated as those that will be designed and enhanced, and those that will be removed or impacts assumed as a result of interactions with the future Highway 413. There is no reference to Appendix K, nor a list or figure to support the impact assessment, which would help the reader. New Comment** a) Tables 44 and 45 should be combined, and differences between them resolved. With respect to watercourses, there is no discussion of specific impacts (at a reach scale) except for a general discussion of channel realignments, HDF management, erosion thresholds and exceedances. Table 78 summarizes impacts specific to the criteria set out in Tables 44 and 45. Please note that Table 44 only lists maintenance of channel length and erosion mitigation, and Table 45 has drainage density as an additional factor applied to the fluvial geomorphology assessment. Table 78 has a discussion on Erosion hazards. Please update Tables 44, 45, and 78 to be consistent, and include discussions within Section 11.4 specific to the factors identified for the impact assessment. The LSS section references do not align with the comment response e.g. “The second submission of the LSS will include a table and additional content, as needed, that clearly classifies all watercourse and HDF reaches based on their assessed stability, conveyance capacity, and the recommended management strategy.” - does not seem to be included. NewComment** b) Has the Regulatory Allowance 15 m as applied to the greatest hazard been included within the impact assessment? It is unclear in the current submission. New Comment** c) Has the approach to assume impacts associated of the Highway 413 to features within and downstream of the highway been accepted by the TAC?	A table and additional text have been added to Sections 11.6 and 11.7 to provide additional detail. a) Former Tables 44 and 45 have been combined, and the maintenance of drainage density has been removed from the assessment (see new Table 50). A function-based approach is applied to address low order tributaries through application of TRCA and CVC (2014) guidelines. Refer to Sections 11. 6 and 11.7 for details related to the impact assessment. b) The 15 m Regulatory Allowance is not included because it is usually applied to the largest of the erosion and flood hazard constraints. In addition, it is an allowance, which is distinct from a buffer. c) As noted during the virtual meeting with the Town of Caledon and Montrose on November 11, 2025, the Town’s preference was to assign HDF management classifications based on existing conditions, independent of the future Highway 413; however, preliminary design plans are now available for Highway 413. The HDF mapping has been revised to only include reaches within or that overlap with the Alloa Secondary Plan Study Area (e.g. management classifications for Reaches FD3 and FD2-1 have been removed) as reaches fully within or upstream of Highway 413 will be considered by the MTO. For Reaches where modifiers were applied due to anticipated impacts from future Highway 413, management recommendations have been revised from Mitigation to Conservation where crossings are provided under the Highway (i.e., upstream portions of AD1-3 and AD1-2A). It is likely that the proposed crossing infrastructure will be extensive, and in turn, there may be reductions in feature length and function as a result of highway implementation. This text has been added to Sections 7.5.3, 7.5.4 of the LSS and Appendix N.
101	Montrose Environmental	Mar 3 2025	Section 11.4 - Similar to preceding comment, “Existing and future development impacts shall be evaluated with the development strategy indicated to limit the negative impacts, while accommodating opportunities to restore and improve the existing watercourse or HDF condition. This approach will need to consider watercourse constraints (high or medium constraint, as per the SABE Scoped LSS) and HDF management classifications (protection, conservation, mitigation, no management) which determine the recommendations for those features which remain on the landscape (protected in-place or realigned) versus those (HDFs) which can be removed subject to appropriate management practices”. Reach specific impacts and recommendations were not included within the LSS. A tabular format based on constraint (HDF or watercourse) would assist in this regard.	We recognize the importance of documenting reach-specific impacts and management recommendations in a clear and concise format. While this information is currently embedded within the geomorphic assessments and conceptual design work, an explicit summary is valuable and will be included in the second LSS submission. Refer to responses to Montrose comment #48, which are also related to watercourse constraint rankings.	Oct 2 2025	Comment Partially addressed - However, HDF classifications provided in Appendix K; Watercourse ranking in Section 17.4 - It is recommended that this information be provided in the baseline characterization as it includes updates to the SABE classifications, and within the impact assessment to discuss how the land use plan meets the requirements of reach constraints. For the impact assessment, it would be acceptable to list the implications of feature constraints to the land use plan, and refer back to Section 10.5 for design related management, and reference 17.4 for specific reach-based management.	HDF management classifications are discussed in Sections 7.5.4, 11.6 and 17.5.1. Additional detail has been added to Section 11.6 in table format to describe the impact assessment at a finer scale. This information is then referred to Section 17.5.
102	Montrose Environmental	Mar 3 2025	Page 177 - Table 49 briefly discusses the impacts to watercourses (in general) based on constraint; this requires prior discussion in the Impact Assessment or Baseline Characterization.	In the resubmission of the LSS, additional content will be included in the Baseline Characterization (Section 7.5) and Impact Assessment (Section 11.4) to provide context for how watercourse constraints were evaluated and how they informed the subsequent impact assessment and management recommendations. This will include a more fulsome explanation of the constraint classification approach (e.g., high, medium and low), integrated with HDF management classifications, and will explicitly link these classifications to the decision-making process. Refer to Montrose comment #48 for a preliminary constraint ranking framework.	Oct 2 2025	Comment Partially addressed. See response to comment 101. There is no discussion regarding impacts to watercourse reaches	Refer to response to Comment 101.
103	Montrose Environmental	Mar 3 2025	Page 165 – Section 11.4.1 – section refers to 10 SWMF – earlier the report referenced 11 SWMF.	The number of SWM facilities has been updated to be consistent throughout the report	Oct 2 2025	Comment addressed	No action.
104	Montrose Environmental	Mar 3 2025	Page 165 – Section 11.4.1 – the report notes that creek corridors need to consider the downstream watercourse corridors both built and planned; notably the Heritage Heights LSS is on-going and these independent planning processes need to align to allow for appropriate staging and design planning.	We respectfully suggest that our contributions to Heritage Heights planning area are minor, and that Mayfield Road acts as a barrier between the sites, further decreasing contributions. As the contributions to Heritage Heights are limited, we suggest that aligning the planning processes is not necessary.	Oct 2 2025	Comment not addressed: Planning coordination required between Town and Brampton	Consultation regarding alignment with the Heritage Heights planning area will continue with the Town of Caledon and the City of Brampton when the Phase 2 EIR proceeds. Please refer to Section 18.1.4 of the LSS and the Erosion Threshold and Exceedance Assessment for reference to the ongoing review of the Heritage Heights erosion threshold; please also refer to response to comment #49a.
105	Montrose Environmental	Mar 3 2025	Page 166 – Section 11.4.2 – as noted earlier the data and methodology for the erosion thresholds for the Etobicoke Creek documented in the Mayfield West Phase 2 lands is well over 10 years old and should be re-visited as part of this LSS. The same holds true for Section 11.4.4 regarding the Mount Pleasant lands whereby the data are approaching 20 years old.	Refer to responses to TRCA comment #1 and Montrose comments #25, #99 and #143.	Oct 2 2025	Please refer to comment responses 25, 143, and additional H&H comments (below) for the second submission.	Acknowledged.
106	Montrose Environmental	Mar 3 2025	<u>Surface Water Quality</u> Page 167 – Section 11.5 – can the data be provided regarding water quality and also an interpretation as to whether there are any outliers or contaminants of concern which need to be considered under existing and future conditions? The information should be compared to PWQO to provide a context for the area’s surface water quality.	The comprehensive water quality monitoring program is ongoing and is designed to support characterization of baseline conditions and inform the impact assessment. Sampling is event-based and will capture conditions in the spring, summer and fall. Refer to the response to Montrose comment #52 for the frequency and parameters being measured. Data collected as part of this program will be evaluated against the Provincial Water Quality Objectives (PWQO) and other relevant guidelines to identify any exceedances, trends, or contaminants of concern. This assessment will be included in the second submission of the LSS.	Oct 2 2025	Comment partially addressed: as noted - monitoring program has only captured two partial years	Baseline surface water monitoring will continue in 2026 to collect two full years of data. Refer to Appendix O for a summary of all monitoring data completed to date. Additional data will be integrated in the Phase 1 EIR (ongoing) and Phase 2 EIR (to be initiated at a later date), as appropriate.

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107	Montrose Environmental	Mar 3 2025	Fisheries and Terrestrial System Sections Page 167 – Sections 11.6 and 11.7 – these sections speak to work yet to be executed in terms of impact assessment to fisheries and terrestrial systems and associated management – this information needs to be documented as part of the LSS.	Additional field data collection and analysis was completed by Azimuth and CEA following the first submission of the LSS. Consideration of these data will be included in the updated LSS document.	Oct 2 2025	Comment addressed	No action.
108	Montrose Environmental	Mar 3 2025	Climate Section 11.8 – Overall, climate change assessment work has not been addressed in any significant manner within the LSS. Detailed assessment and analysis have been deferred to the detailed design stage; no direction, goals, or methodologies have been outlined as to what will be done in future work.	Climate change assessment was completed in a similar manner to the approved LSS for Mayfield and Wildfield lands in Caledon. The Town of Caledon TOR for LSS describes completing a climate change analysis but no specific direction on incorporating the analysis has been provided to consultants. The climate change analysis has been completed to provide recommendations for development within the Alloa area.	Oct 2 2025	Comment partially addressed. Response explains with a reliance on precedent and ToR limitations but does not provide methodologies, direction, or goals as requested.	The LSS includes additional information regarding climate impacts. Section 11.11 Climate Change provides detailed information on the approach taken, with other references made throughout the LSS. Information on proposed actions to be undertaken in future phases is outlined in the Climate Adaptation Plan dated December 1, 2025.
109	Montrose Environmental	Mar 3 2025	Section 11.8 – A climate change impact assessment using two scenarios as laid out in the ToR (page 18) has not been completed.	It appears that the Town of Caledon's May 2024 TOR was used to verify scope of work for the LSS. The Town of Caledon's Draft May 2023 was used as the base for our approved TOR (October 2024). Please refer only to our approved TOR (October 2024).	Oct 2 2025	Comment partially addressed. Response clarifies ToR requirements. If agencies agree October ToR supersedes May draft, then requirement for two scenarios is invalid.	Acknowledged. Data was requested and acquired from the TRCA for the identified scenarios. Both scenarios (RCP4.5 and RCP8.5) are discussed within the LSS and the data itself is cited in Section 11.11 Climate Change. It was noted that the data made available from the TRCA was not sufficient to enable modeling at the subwatershed level for several design elements, notably the channel block / floodplain hazard, culvert sizing, and SWM pond blocks. Rationale for these limitations is provided.
110	Montrose Environmental	Mar 3 2025	Section 11.8 – While the Natural Heritage System was referenced as a methodology of mitigating some of the impacts of climate change, as required in the TOR, a risk assessment on the impact of climate change to the NHS has not been completed.	It appears that the Town of Caledon's May 2024 TOR was used to verify scope of work for the LSS. The Town of Caledon's Draft May 2023 was used as the base for our approved TOR (October 2024). Please refer only to our approved TOR (October 2024).	Oct 2 2025	Comment partially addressed: If October ToR governs, omission is valid. Substantive risk assessment still absent.	Acknowledged. Additional information on the evaluation of future climate conditions has been added in Section 11.11 Climate Change. Specifically, Table 63 in Section 11.11 identifies anticipated trends due to climate change based on available model forecasts. Table 64 identifies specific risk associated with infrastructure and natural heritage in Alloa. It is also worth noting that Table 53 in Section 11.3.3 addresses wetland risk evaluation. While this is not specific to climate change impacts, it is worth noting that the findings of the wetland risk evaluation illustrate the 'low' risk associated with water taking which shows that potential changes to hydrology, whether development driven or due to climate change, are anticipated to have minimal impact on the wetlands in the Alloa Secondary Plan area.
111	Montrose Environmental	Mar 3 2025	Section 11.8 – while outlined in the TOR, assessing the impact of climate change on groundwater systems was not mentioned in groundwater studies. An assessments of urbanization has been completed, but no mention of climate change.	LSS to be updated with updated with expanded climate change impacts.	Oct 2 2025	Comment partially addressed: No numerical assessment provided - discuss with Town/TAC	The LSS includes additional information regarding climate impacts. Section 11.11 Climate Change provides detailed information on the approach taken, with other references made throughout the LSS.
112	Montrose Environmental	Mar 3 2025	Page 173 – Section 11.8 – the text states that there is no specific guidance to assess climate change impacts – this is not true as many jurisdictions have reviewed and assessed techniques to evaluate these potential impacts including adjustments to IDF projections. Further work is required by the applicant to consider these quantitative measures and others consistent with the TOR and the PPS.	At the time of the writing of the First Submission of the LSS, no specific guidelines from the Town were available. Similarly, the ToR does not indicate climate change assessments are required at the Secondary Plan level. Through discussions with agency staff and the reviewers, further discussion regarding climate change has been provided as part of the LSS resubmission. Further information and analyses will be completed at the Tertiary Plan and Draft Plan level when more detail is required and relevant.	Oct 2 2025	Comment partially addressed: No numerical assessment provided - discuss with Town/TAC	The LSS includes additional information regarding climate impacts. Section 11.11 Climate Change provides detailed information on the approach taken, with other references made throughout the LSS. Table 64 summarizes potential climate impacts to key design elements and outlines data sources used. It was noted by the Town that work is currently underway to prepare climate-adjusted IDF values and that this information will be made available once ready. Design can be updated once the updated IDF parameters are published.
113	Montrose Environmental	Mar 3 2025	Page 173 – Section 11.8 - states: "The extent of existing or proposed flood hazards will not be affected by increased intensity, frequency and duration of storm events due to climate change" (This is also mentioned on Pg 234 paragraph 4). The Regional Storm is being used as the volume to design control and conveyance measures. The Etobicoke Creek Watershed Plan (page 96 of the Etobicoke Creek Watershed Plan 2024-2034 paragraph titled "For Consideration") recommends that an additional 18.9mm of rainfall volume be added to account for the effects of climate change. If this additional volume has not been included, please update analyses.	URBANTECH: During the April 2025 workshop, TRCA agreed that the 18.9mm volume was not intended to apply to the Regional storm, since it is a historical event, and since there is no prescribed method to applying this additional volume. As discussed in the updated LSS in Section 11.8, as well as in the Regional Storm vs. 100-year storm memo in the appendix, there is no point in this study area at which the Regional storm is less than the 100-year storm, even with climate change increases applied to the 100-year intensity. Furthermore, the stone sizing at the pond outfalls will be sized based on the maximum flow released from the ponds, which is the Regional flow (not subject to climate change).	Oct 2 2025	Comment addressed	Acknowledged.
114	Montrose Environmental	Mar 3 2025	Page 173 – Section 11.8 - "As there is the potential for increased frequency of flows in the creeks due to climate change, the impacts of these flows on erosion protection measures should be considered at detailed design. While this will not affect channel block sizes, it could impact the sizing of stone protection or other mitigation measures". Climate change considerations have been deferred to the detailed design. No mention of how climate change will be incorporated has been detailed.	URBANTECH: As discussed in the April 23, 2025 workshop with the agencies, a method to produce climate-adjusted precipitation and temperature data has not been established. Therefore, the continuous modelling cannot reflect a future climate change scenario unless specific direction is provided by the Town/TRCA including specific climate-adjusted weather data. However, a sensitivity analysis was conducted to evaluate the effects of a "high flow" scenario on erosion. This is documented in the updated LSS.	Oct 2 2025	Comment partially addressed: No numerical assessment provided - discuss with Town/TAC	During the October 7th, 2025 meeting and the previous workshops, it was identified that there is insufficient climate data to complete the continuous modelling for climate scenarios. TRCA and the peer review team acknowledged that sensitivity analysis was sufficient to address climate extremes at this time (for the purposes of the LSW5). It is our understanding that there is still no available continuous climate data that reflects climate change scenarios (climate adjusted rainfall on a 15 minute time step or less; climate-adjusted daily min-/max- temperatures, etc.).

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115	Montrose Environmental	Mar 3 2025	Page 174 – Section 11.8 – To ensure that stormwater sewers and downstream culverts can withstand the impacts of climate change during more frequent and intense storm events, we request that the proposed pipe and culvert sizes be evaluated during the detailed design stage, taking into account the potential for increased frequency, duration, and intensity of storms due to climate change. Storm sewer designs may be updated or changed once the Town publishes revised IDF parameters that incorporate climate change considerations, but it is important to address climate-related design considerations at this stage, while awaiting input from Caledon to proceed with setting the final design parameters.	URBANTECH: We agree that the crossing design will continue to evolve through the detailed design processes. At this time, it is assumed that the crossings will be sized for the Regional storm as per typical requirements from TRCA and the Town. Therefore, climate change will not impact the sizing of the crossings since the Regional storm is a historical storm and will always generate higher peak flows compared to the 100-year event, even with climate change considered (based on the contributing drainage areas as described in the Regional vs. 100-year comparison memo).	Oct 2 2025	Comment addressed	No action.
116	Montrose Environmental	Mar 3 2025	<u>Transportation Master Plan Considerations</u> Page 175 – Section 11.9 – It is unclear as to what alternatives have been assessed in regards to road patterns in order to minimize impacts to the NHS and WRS – additional details and documentation is required in this regard.	Discussions are ongoing with the Town regarding road patterns	Oct 2 2025	Comment not addressed: need to acknowledge that aspects of the SWM and LSS may change with changing road patterns	It is recognized that changing road network alignments caused by the Town of Caledon Multi-Modal Transportation Master Plan Addendum or through other processes could necessitate changes to the SWM and / or LSS. It is emphasized that road network alignment alternatives have been assessed both as part of the Town's MMTMP EA process, and at the formulation stage of the Secondary Plan which considered environmental and transportation priorities. More discussion on the formulation of the road network is included within Section 6 of the August 2025 Transportation Needs Assessment.
117	Montrose Environmental	Mar 3 2025	<u>SUMMARY OF IMPACT ASSESSMENT OUTCOMES</u> Phase 2 Integration and Summary of Impact Assessment Page 176 – Section 12 and Table 49 – this section states that every evaluation factor has been assessed – it would be helpful if the tabular summary of this assessment can also provide a review of the alternatives which were considered for each?	Acknowledged.	Oct 2 2025	Comment not addressed: no table provided	Comment noted. Additional text is provided in Section 12 to address alternative.
118	Montrose Environmental	Mar 3 2025	Page 180 – Section 12 – there is reference to the potential need for “additional stormwater quantity control” to protect downstream properties from flooding – these details need to be provided in this LSS with due consideration of all future development lands draining to the FVAs identified in the Scoped SWS.	URBANTECH: SWM controls, including Regional control, have been modelled and assessed in the LSS in order to demonstrate that the proposed SWM controls will mitigate any increase in peak flows resulting from the subject development. A downstream analysis has also been completed to confirm that there are no downstream impacts.	Oct 2 2025	Comment not addressed; this information is required within the LSS.	No additional stormwater quantity controls are required to mitigate flood risk - the use of the ECHUS targets for the Regional storm are sufficient to control the Regional flows. As per Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS), a downstream analysis was completed to demonstrate that the proposed SWM controls will mitigate any increase in peak flows resulting from the subject development.
119	Montrose Environmental	Mar 3 2025	<u>Next Steps</u> Page 180 – Section 13 – in regards to the Next Steps which have been cited – it is suggested that all of these fall within the current scope of the LSS and need to be completed accordingly.	Next Steps as listed in Section 13.0 are addressed in the LSS in the Phase 3 section of the report	Oct 2 2025	Comment addressed	No action.
120	Montrose Environmental	Mar 3 2025	<u>POLICY CONFORMANCE REVIEW</u> <u>Provincial Policy Statement, 2020</u> Page 182 – Section 15.1 – the PPS 2020 has been updated to the PPS 2024 – as such this section needs updating.	The LSS has been updated to reference the PPS 2024.	Oct 2 2025	Comment addressed	No action.
121	Montrose Environmental	Mar 3 2025	<u>A Place To Grow: Growth Plan for the Greater Golden Horseshoe, 2020</u> Page 187 – Section 15.2 – the Growth Plan has been updated by the PPS 2024 – as such this section can be removed.	Acknowledged. Reference to the Growth Plan for the Greater Golden Horseshoe has been removed.	Oct 2 2025	Comment addressed	No action.
122	Montrose Environmental	Mar 3 2025	<u>Conservation Authority Policies</u> Page 190 – Section 15.6 – the regulation for both TRCA and CVC has been updated and should be reflected in this summary specific to O. Reg. 41/24.	The LSS has been updated to reflect O.Reg. 41/24.	Oct 2 2025	Comment addressed	No action.
123	Montrose Environmental	Mar 3 2025	<u>DEVELOPMENT OF LAND USE PLAN</u> <u>Water Resource System</u> Page 196 – Section 16.2 – “Flood hazards: Flood hazards in the adjacent creeks have been established using the Regional event (Hurricane Hazel) which is based on an historic event. As such, the extent of existing or proposed flood hazards will not be affected by increased intensity, frequency and duration of storm events due to climate change.” The Etobicoke Creek Watershed Plan (page 96 of the Etobicoke Creek Watershed Plan 2024-2034 paragraph titled “for consideration”) recommends that an additional 18.9mm of rainfall volume be added to account for the effects of climate change. This should be considered in the updated assessment of flood hazards.	URBANTECH (copied from Montrose comment #113). During the April 2025 workshop, TRCA agreed that the 18.9mm volume was not intended to apply to the Regional storm, since it is a historical event, and since there is no prescribed method to applying this additional volume. As discussed in the updated LSS in Section 11.8, as well as in the Regional Storm vs. 100-year storm memo in the appendix, there is no point in this study area at which the Regional storm is less than the 100-year storm, even with climate change increases applied to the 100-year intensity. Furthermore, the stone sizing at the pond outfalls will be sized based on the maximum flow released from the ponds, which is the Regional flow (not subject to climate change).	Oct 2 2025	Comment addressed	No action.
124	Montrose Environmental	Mar 3 2025	<u>DEVELOPMENT AND ANALYSIS OF PREFERRED MANAGEMENT STRATEGY</u> <u>Groundwater Management</u> Page 157 - Section 11.2.3 - Drinking water threats associated with the proposed development are listed, and contaminant management plans, and or source water protection materials are discussed as potentially being required to facilitate activities on the development lands, including for the duration of construction practices. Page 206 – Section 17.2.2 - There is no specific discussion on what the contaminant management plans would entail for the four low to moderate drinking water threats that are anticipated. This needs to align with Region of Peel Source Water Protection policies.	Detailed development of contaminant management plans, winter maintenance plan and other source protection documents is premature at the LSS stage. Best management practices have been outlined in the report as recommendations for source protection. As Montrose should be aware, the development of Risk Management Plans and other instruments is completed as part of the site plan process in coordination with the local Risk Management Official. There are many factors that can impact the risk rating of a particular activity as well as the prescribed instrument required to address the risk in the local Plan. It would not be practicable to develop those detailed plans at this stage in the process.	Oct 2 2025	Comment partially addressed: recommend that it is appropriate for some of this text to be included as part of guidance for future work	Noted. Text on available tools and instruments have been included in Section 18.1.1.

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125	Montrose Environmental	Mar 3 2025	Page 217 – Section 18.1.1 - A discussion is provided on Alloa Secondary Plan Area activities needing to respect source water protection policies and consider using appropriate instruments to ensure the responsible management of groundwater quality. There is no discussion of what these instruments would include, apart from the discussion on the implementation of stormwater management controls that introduce clean runoff to infiltration features.	Specific instruments related to source protection and the management of groundwater quality will be dealt with on a site level basis when potential activities are identified. Most instruments set out requirements that are specific or customized to the activity being carried out at one site and in some cases multiple sites operated by one company or person and were therefore previously omitted. Examples of potential instruments related to potential activities have been included in the LSS. As stated above, Montrose should be aware of the process around identifying risks under the local Plan which is done in cooperation with the local Risk Management Official at the time of Site Plan Application.	Oct 2 2025	Comment partially addressed: recommend that it is appropriate for some of this text to be included as part of guidance for future work	Instruments are standard across source protection regions and can be referenced direct from CTC plan at the time of guidance requirement. Additional context has been included in Section 18.1.1.
126	Montrose Environmental	Mar 3 2025	Table 49 - The comments associated with the Hydrogeology Pre-to-Post Development Water Balance item states that potential impacts to groundwater recharge can be mitigated through the use of SWM and LID measures, with LID features including dry SWM ponds. Based on the high groundwater elevations and flowing artesian conditions encountered, there is no discussion on how dry SWM ponds will be built and maintained.	The intent is to meet water balance requirements through the use of LIDs. Dry ponds have been removed as an example in Table 49.	Oct 2 2025	Comment Addressed	No action.
127	Montrose Environmental	Mar 3 2025	General Comment - Timing and Phasing: The level of detail provided pertaining to the timing of the phases is insufficient as recommendations related to LID measure implementation are described in the report as "as required".	The site wide water balance and sensitivity analysis prepared by Urbantech looks at the effects of parameters to provide conservative estimates for flow, infiltration, and general water balance information across Phases 1 and 2 of the Secondary Plan. The revised water balance findings will dictate the overall infiltration requirements of the Secondary Plan. Similarly, the revised natural channel design and constructed wetlands, as prepared by GeoMorphix, are anticipated to address the overall infiltration loss across the Secondary Plan. Since the Alloa Drain will need to be constructed as part of the first phase of site works, infiltration volumes are anticipated to be balanced as part of the first phase of construction.	Oct 2 2025	Comment Addressed	No action.
128	Montrose Environmental	Mar 3 2025	General Comment - Asset Management Strategies: Unable to locate a phasing and funding strategy, but recommendations for future studies are integrated throughout the document. More details are required.	Acknowledged. Phasing and funding strategies to be confirmed at later/detailed stages of the project.	Oct 2 2025	Comment not addressed: please include guidance to develop phasing and funding strategies at later stages/detailed design	Asset management and funding strategies will be included in the Development Agreements at the detailed design stage of the project. At this stage of the project, assets are conceptual, locations are approximate, sizes/quantities/designs are not fixed, and some assets may ultimately be eliminated or combined. As a result, capital costs, lifecycle costs and O&M responsibilities cannot be quantified with confidence within the LSS. The need for this future study has been identified in Section 19 of the LSS.
129	Montrose Environmental	Mar 3 2025	Stormwater Management General Comment - Section 17.3 of the LSS summarizes the stormwater management facility sizing criteria for the future development within the study area. The information presented in this section is based upon recommendations from previous studies supporting other development areas, and governing TRCA unitary flow criteria for the Etobicoke Creek Watershed. The hydrologic analyses for the LSS should verify these findings and revise as appropriate, to be specifically applicable to the methodology applied within the LSS. As noted previously, the hydrologic analyses should consider additional downstream locations in order to clearly demonstrate that the recommended stormwater management plan would provide the requisite flood and erosion protection for downstream properties and receiving watercourses.	All drainage outlets from the subject lands have now been included in the flow summary. The proposed SWM strategy for the subject lands involves ensuring existing flows at Chinguacousy Road are not exceeded. An additional downstream node has been added to the analysis to demonstrate that timing effects are not significantly affected. In general, if the peak flow at Chinguacousy Road is matched / reduced, then all the downstream flows will be reduced (assuming similar peak flow timing / addition downstream). It is not necessary to evaluate flows at the outlet of Etobicoke Creek to Lake Ontario, since the LSS demonstrates no negative impact to flows and timing immediately downstream of the subject lands.	Oct 2 2025	Comment Not Addressed: See new hydrology comments	The SWM targets, as discussed in Section 3.3 of the Scoped Servicing Study (provided in Appendix K of the LSS), are based on the unitary targets per the approved subwatershed studies. It should be noted that the targets from these SWS' were also used in the approved Mayfield West Phase II developments to the east. Similarly, the entirety of Northwest Brampton was designed using the targets in the HFSWS. New targets are not required for the LSS/SSS studies as it relates to quantity control, since these were already established and approved for use. As per Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS), a downstream impact/capacity analysis was completed for both Etobicoke Creek and Fletcher's Creek to confirm that there are no downstream impacts related to the proposed development.
130	Montrose Environmental	Mar 3 2025	Fluvial Geomorphology Page 213 – Section 17.4.1 - Watercourse constraints and their opportunities are discussed in detail in this section. Phase 1 and 2 of the report and can benefit by moving much of this section earlier in the LSS as they directly relate to impacts.	Acknowledged. Watercourse constraints discussed in Section 17.4.1 will be moved to earlier sections of the LSS second submission, as appropriate.	Oct 2 2025	Comment not addressed. Recommended that watercourse rankings be discussed earlier in report as updates have been made based on detailed updates to the existing conditions (compared to the SABE study), and also within the impact assessment. See response to comment 101	The watercourse constraint rankings are now discussed in Sections 7.5.8 of the LSS.
131	Montrose Environmental	Mar 3 2025	Page 213 – Section 17.4.1 - HDF management recommendations should be provided in a subsequent submission, though preliminary recommendations are provided in Appendix K (see comments below)	Acknowledged. HDF management recommendations will be provided in the body of the second LSS submission.	Oct 2 2025	Comment addressed - Appendix K updated with 3rd visit and HDF management recommendations included. Summary and figure of recommendation provided in Section 7.5.4.	No action.

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132	Montrose Environmental	Mar 3 2025	<p>PREFERRED MANAGEMENT STRATEGY Water Resource System Page 220 – Figure 29 – the use of private SWM systems needs to be limited and appropriately rationalized.</p>	<p>We understand that CVC does not support private / on-site Regional controls. However, the Secondary Plan's employment lands along Mayfield Road preclude large public facilities typically used to meet the Regional volume requirements. Each block must drain to discrete outlets provided on Mayfield Road to convey drainage to channels, wetlands and facilities downstream. There is no practical way to consolidate runoff into shared ponds or larger detention areas due to grading constraints, and traditional, public wet-pond blocks are not feasible or practical for these small parcels.</p> <p>Therefore, the quantity control requirements for each individual private site plan block along Mayfield Road will follow a hierarchy of evaluation as described in the LSS:</p> <p>1. Available Outlet Pipe / Culvert Capacity – Verify that the existing Mayfield Road sewers / culvert crossings (with no upgrades assumed) can convey the controlled 100-year peak. If it can, the block simply adheres to HFLSS unit rates for the 2-year to 100-year events. If not, the allowable release rate must be reduced to match the pipe capacity, and additional on-site storage solutions (e.g., underground tanks, pipe storage, rooftop storage, surface storage, etc. to ensure the 100-year peak never exceeds downstream capacity.</p> <p>2. Meet the HFLSS Unit rates and release Uncontrolled Regional Flows – If outlet capacity is not limited, and where a conventional detention facility remains impractical, it is possible that post-development Regional peak flow is only marginally higher than the existing Regional flow. In this case, a "no-impact" analysis should be completed to demonstrate that releasing the uncontrolled Regional flows does impact downstream water levels / infrastructure beyond acceptable thresholds (to be determined with the CVC). This would involve evaluating the downstream storm sewers, culverts/channels (HEC-RAS analysis) and overall hydrology (HFLSS HSP-F model). This approach was previously accepted by CVC for small areas in which meeting the Regional storage criteria was impractical and absence of the Regional volume had no effect downstream (e.g., Block 51-3, Daniels high density site south of CNR, Mattamy Feedmill site).</p> <p>3. HFLSS Unit Rate Targets (2- to 100-Year and Regional) – Design controls to meet these prescribed release rates if existing infrastructure does not limit the allowable release rate, and the Town and CVC should accept private on-site Regional facilities. Note that HFLSS does not specify a private Regional peak control target—only an overall volume target (m3/imp ha).</p> <p>The individual requirements for each block will be determined at the Tertiary Plan / FSR stage and refined through detailed design.</p>	Oct 2 2025	<p>Comment partially addressed: Need to confirm appropriateness of this approach with CA's</p>	<p>Per comments received from CVC (November 18, 2025), the quantity control hierarchy for the private site plan blocks along Mayfield Road was revised to the following: LSS:</p> <p>1. Available Outlet Pipe / Culvert Capacity – Verify that the existing Mayfield Road sewers / culvert crossings (with no upgrades assumed) can convey the controlled 100-year peak. If it can, the block simply adheres to HFLSS unit rates for the 2-year to 100-year events. If not, the allowable release rate must be reduced to match the pipe capacity, and additional on-site storage solutions (e.g., underground tanks, pipe storage, rooftop storage, surface storage, etc. to ensure the 100-year peak never exceeds downstream capacity.</p> <p>2. Meet the HFLSS Unit rates and release Uncontrolled Regional Flows – If outlet capacity is not limited, and where a conventional detention facility remains impractical, it is possible that post-development Regional peak flow is only marginally higher than the existing Regional flow. In this case, a "no-impact" analysis should be completed to demonstrate that releasing the uncontrolled Regional flows does impact downstream water levels / infrastructure beyond acceptable thresholds (to be determined with the CVC). This would involve evaluating the downstream storm sewers, culverts/channels (HEC-RAS analysis) and overall hydrology (HFLSS HSP-F model). This approach was previously accepted by CVC for small areas in which meeting the Regional storage criteria was impractical and absence of the Regional volume had no effect downstream (e.g., Block 51-3, Daniels high density site south of CNR, Mattamy Feedmill site).</p> <p>The individual requirements for each private site plan block will be determined at the Tertiary Plan / FSR stage and refined through detailed design. This has been updated in Section 3.5.3 of the Scoped Servicing Study (provided in Appendix K of the LSS),</p>
133	Montrose Environmental	Mar 3 2025	<p>COMPREHENSIVE ADAPTIVE MANAGEMENT PLAN (CAMP) Page 232 – Table 57 – the proposed CAMP should consider potential alignment with the Town's overall Town-wide monitoring plan in support of its CLI-ECA, based on the pending guidance from MECP. Further discussion and considerations are required in the LSS in this regard.</p>	Acknowledged.	Oct 2 2025	<p>Comment not addressed: It is unclear from the table as to how the CLI ECA requirements of the Town have been considered and/or integrated?</p>	<p>The applicable Consolidated Linear Infrastructure ECA requirements are summarized in Section 3.3.4 of the Scoped Servicing Study (provided in Appendix K of the LSS). The project-specific compliance strategy (e.g., facility selection, sizing, documentation, O&M) will be confirmed at the FSR stage, when greater design detail is available and required.</p> <p>A screening-level LID feasibility plan (Drawing 3E) was included as part of the LSS. It delineates areas where LID measures are technically viable based on interpreted groundwater elevations and proposed finished grades; it is intended to guide, not pre-empt, FSR-level design.</p> <p>As it relates to water quality control, the CLI ECA does not alter the conclusions or recommendations of the LSS. Most catchments are planned to be treated via a treatment-train approach using combinations of LIDs, SWM facilities, and, where appropriate, OGS units to meet applicable quality objectives. The final configuration and crediting consistent with the CLI ECA will be confirmed through the FSR and detailed design stages.</p>
134	Montrose Environmental	Mar 3 2025	<p>Page 238 - Table 57 - Fluvial geomorphology monitoring focuses on natural channel design performance monitoring. Some mention of a Town holistic monitoring plan may be appropriate for downstream sites and should be identified.</p>	Acknowledged. A Town of Caledon holistic monitoring plan will be explored and where appropriate, will be integrated in the LSS.	Oct 2 2025	<p>Comment Partially addressed. Monitoring plan includes sites downstream of proposed SWM facilities. Town to confirm that this is sufficient.</p>	The Town has not provided any comments on the locations of proposed monitoring. As such, the proposed program is assumed to be adequate, and can be refined as the Phase 1 and Phase 2 EIRs proceed.
135	Montrose Environmental	Mar 3 2025	<p>REFERENCES Page 243 – Section 22 – several references in the report are not contained in the current list of references – this should be updated.</p>	Acknowledged.	Oct 2 2025	<p>Comment Partially addressed. Reference list has been updated but there are still references contained in the report that are not in the reference list.</p>	Addressed. The reference list and references within the report have been updated.
136	Montrose Environmental	Mar 3 2025	<p>NOTES ON APPENDICES: Appendix K – Headwater Drainage Feature Assessment It is understood that HDFA third visit results are to be provided in a subsequent submission.</p>	The second LSS submission will document the Round 3 HDF site visits conducted in 2024, which were completed following submission of the LSS.	Oct 2 2025	<p>Comment addressed - Report and Appendix K updated to include third HDF visit.</p>	No action.
137	Montrose Environmental	Mar 3 2025	<p>Not clear how HDF delineation update was completed relative to the SABE work. It is noted that stream layers and topography were reviewed to identify potential HDFs. The SABE completed DEM processing to identify HDFs, was the current HDFA completed similarly, or mainly updated through fieldwork and site observations?</p>	The HDF assessments conducted by GEO Morphix included a review of previously completed mapping and extensive ground truthing where access was granted.	Oct 2 2025	<p>Comment addressed. Methods described within reach delineation section of Appendix K and main report</p>	No action.

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138	Montrose Environmental	Mar 3 2025	Preliminary management recommendations have been provided with modifiers on the result of the TRCA/CVC HDF constraint. Please provide more context around modifiers in the HDFA and how they were applied, and how/why each may change the result. The evaluation tables would preferably include the HDFA result prior to the modification and resultant management recommendation.	The HDF reporting will be revised to clarify the modifiers considered and how/why it changed the management classification outcome. As part of this, the management classification without the modifier will be included in the reporting to fully document the decision process.	Oct 2 2025	Comment addressed - Table 1 in Appendix K updated to include HDF classification based on guidelines as well as modified classifications and reasoning for modifications.	No action.
139	Montrose Environmental	Mar 3 2025	As mentioned earlier, the HDFA could be better incorporated into the discussion of the fluvial geomorphology characterization and impact assessment as the surface water system is a connected network.	Acknowledged. The HDF assessment and management classifications will be incorporated in the fluvial geomorphology characterization.	Oct 2 2025	Comment addressed - Section 7.5 of LSS includes summary of characterization of HDFs and Watercourses.	No action.
140	Montrose Environmental	Mar 3 2025	APPENDIX L – FLUVIAL GEOMORPHOLOGY ASSESSMENT Reach delineation description for watercourses and HDFs described in this document there would fit well in the LSS.	Acknowledged. Refer to the response to Montrose comment #44.	Oct 2 2025	Comment addressed - Reach delineation in Section 7.5.1 of LSS.	No action.
141	Montrose Environmental	Mar 3 2025	Meander belt widths were not mapped as part of existing condition. Comparison against TRCA mapping for Etobicoke Creek can provide some additional insight on the existing vs proposed system into the impact assessment.	Meander belt width mapping was provided in Appendix L of the LSS. Meander belt widths will also be added to the existing conditions mapping in the overall LSS document. See response to Montrose comments #50 and #98.	Oct 2 2025	Comment addressed - Existing conditions meander belt widths provided in Section 7.5.7, Appendix M, and on figures in Appendix L. New Comment a) Why was the Williams (1986) result selected for AD1-2?	The meander belt width value of 19 m was selected based on the modified Williams (1986) equation as minimal evidence of erosion was observed in the field and there was limited planform adjustment visible in historical and recent aerial imagery. This text has been added to Section 7.5.7 of the LSS and Section 6 of Appendix M .
142	Montrose Environmental	Mar 3 2025	As mentioned in the LSS comments, the focus of the natural channel design components should be as recommendations. Detailed review of design components would be deferred to a later stage of the planning process.	The natural channel designs provided in the LSS are intended as functional concepts that demonstrate how the identified design objectives, such as hazard mitigation, habitat enhancement, and connectivity, can be achieved within the proposed corridors. While the level of detail exceeds typical expectations for this stage, it was developed intentionally to illustrate how natural hazard requirements have been addressed, given the complexity and timing of the broader planning process. We respectfully suggest that the detail is appropriate to support decision-making at this stage and confirm that the design is being presented as a functional concept, not as a final or detailed design.	Oct 2 2025	Acknowledged. The Town's peer review team has only reviewed these at a level concurrent with the LSS and development/impacts of the land use plan: including consistency with feature constraints, corridor sizing, channel lengths, corridor siting, crossing recommendations, channel size, and general considerations for detailed design. Please refer to Comment 144 for comments relating to the natural channel designs.	No action.
143	Montrose Environmental	Mar 3 2025	Erosion thresholds based on previous works local to the study area, with erosion concerns being mitigated by the fact that many receiving features are already or to be designed with hydraulically sized material(s). Where approved through previous studies, unitary rates are being recommended for the Phase 2 impact assessment. It is suggested that confirmation of stability of receiving features natural or constructed through the impact assessment. Current detailed field surveys could be used to compare and confirm the applicability of the unitary rate from other studies for existing features and their materials, with discussion.	The stability of existing receiving features was assessed through terrain analysis (see response to comment #25) subsequent to the first LSS submission and will be documented in the second LSS submission. The approved erosion thresholds and unitary release rates are applicable and this approach was confirmed to be appropriate through consultation with CVC. The applicability of these approved unitary rates to existing features will be clarified in the second submission of the LSS.	Oct 2 2025	Comment addressed - Terrain analysis provided in Section 11.5 and Appenix Z appears an appropriate analog to confirm stability of receiving feature.	No action.

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144	Montrose Environmental	Mar 3 2025	<p>Natural channel design calculations and dimensions have not been reviewed in detail. The focus of the report, in support of the LSS is to provide support for the corridor sizing approach. Details such as substrate sizing are not necessary to support the LSS and are not reviewed in detail as they should be general recommendations to inform future design opportunities.</p>	<p>It is understood that detailed review of natural channel design components is not required at this stage, and it is agreed that the purpose of the conceptual designs is to support the development of the overall corridor vision and sizing approach.</p> <p>That stated, for completeness and to provide technical context, particularly in support of hazard mitigation and channel function, we have included select channel design calculations and parameters (such as dimensions and substrate recommendations). These are not intended as final design specifications but rather as general recommendations that demonstrate how the channel design objectives could be achieved within the identified corridors.</p> <p>We will revise the report to explicitly clarify that these elements are functional in nature and intended to guide future refinement during detailed design.</p>	Oct 2 2025	<p>Acknowledged. The Town's peer review team has only reviewed these at a level concurrent with the LSS and development/impacts of the land use plan: including consistency with feature constraints, general corridor sizing, channel lengths, corridor siting, crossing recommendations, channel size, and general considerations for detailed design. It is anticipated that detailed reviews of design concepts reviews will be completed through a review of the FSR, as led by the Town.</p> <p>New Comment** a) On page 154, and within Appendix M it is mentioned that "The full set of conceptual design drawings are contained in Appendix M of the LSS and are subject to refinement as the LSS proceeds". It is recommended that a stronger statement be made that the conceptual designs and drawings are intended as general recommendations to demonstrate appropriate management and land use design, and that it is anticipated that through future submission (E.g. FSR), that detailed review by agencies and the Town may lead to changes in the approach and outcome of these conceptual designs. Please include a disclaimer on the cover sheet for Appendix M that speaks to the conceptual level of the current design and anticipated changes and acceptance through future study.</p> <p>New Comment** b) Design objectives detailed in Section 10.5.1 in the LSS are considerate and speak to a broader system enhancement. No action.</p> <p>New Comment** The development of a cross-section through the application of a bankfull/dominant discharge are appropriate, and all channel lengths are increased relative to the existing condition of these straightened features. No Action. Please note that dimensions and sizing have not been reviewed in detail, just the methodology and application.</p> <p>New Comment** c) Conceptual Corridor schematics in Section 10.5.1 (Figures 23-26) do not include the regulatory allowance of 15 m. Please revise, or note the requirements for the allowance.</p> <p>New Comment** d) Channel corridor requirements for designs are detailed in Appendix M, but not within the LSS. For channel design corridors, the Williams (1986) width approach was applied. Why was this chosen over the TRCA (2004) drainage area function, and can you speak to the applicability of the Williams function relative to the proposed channel widths?</p>	<p>a) The sentence in Section 10.5.1 has been revised to state "The conceptual natural corridor design drawings have been prepared to demonstrate how the realigned corridors will function and be integrated with the overall natural heritage system and to present general design elements. The conceptual design is subject to revision as Tertiary Plans proceed. Review and approval by the Town and regulatory agencies will be required in subsequent project stages (i.e., Phase 1 and 2 EIRs and Phase 1 and 2 detailed design)." This text has also been added to Sections 1 and 7 of Appendix M. Given the above, a disclaimer on the cover sheet to Appendix M is not necessary.</p> <p>b) Acknowledged</p> <p>c) The text in Section 10.5.1 has been updated to note application of the 15 m regulatory allowance.</p> <p>d) Channel corridor requirements are now summarized in Section 10.5.3 of the LSS. A range of techniques were applied to calculate the meander belt widths for the designed reaches, including the TRCA (2004) approach and the Williams (1986) approach, modified to include a factor of safety. The meander belt widths have been further refined for this submission to reflect this range of approaches. Additionally, the proposed channel designs have been sized using the 2-yr flows to provide a conservative approach for the conceptual design; however, as the planning process progresses, there are opportunities to refine the channel dimensions using a more frequent but lower magnitude storm event (i.e., between the 1-yr and 2-yr).</p> <p>Using the current dimensions of the channels, designed to a larger return event, the corridor bottom widths for all reaches can accommodate either the TRCA (2004) meander belt widths, and/or the Williams (1986) values. As the channel dimensions will likely be refined to a lower flow event at detailed design, this approach adequately proves that the corridors can address the erosion hazard requirements.</p> <p>It should be noted that the nested channel design implemented in all the Alloa Drain reaches, excepting AD Reach 3a, intentionally creates an inefficient system to provide a more defined channel during lower flow events while still conveying the 2-year return event flow. As a result, the Williams (1986) method typically provides a larger, though similar, meander belt width estimate than the TRCA (2004) approach for the nested reaches. As such, the Williams (1986) was generally selected to be implemented in the nested reaches of the Alloa Drain to provide a more conservative estimate of meander belt width. These values also aligned more closely to the meander belt widths calculated for the existing features, as outlined in Section 6 of Appendix M.</p>
145	Montrose Environmental	Mar 3 2025	<p>Also included in the preliminary design package are planform geometries, corridor wetlands, bioswales (HDFs), and habitat features and other treatments. These materials are atypical for a SWS in which the focus should be on developing the overall vision for management of the watercourses; the details should be considered as general recommendations to inform future design opportunities.</p>	<p>Given the project timing and complexity of the study area, particularly the scale of proposed realignments, we have included additional design elements such as planform geometries, corridor wetlands, bioswales, and habitat features to support a more complete understanding of the proposed vision.</p> <p>For completeness, we will continue to provide this level of information, but we will revise the text to clearly frame these elements as general recommendations to guide future design efforts. This context will ensure the reader understands that these features are not final designs, but functional concepts intended to illustrate feasibility and the ability to meet the stated design objectives.</p>	Oct 2 2025	<p>See response to comment 144</p>	<p>No action.</p>
146	Montrose Environmental	Mar 3 2025	<p>Corridor crossings and sizing are included, this is reasonable and will be reviewed as appropriate for the SWS planning level.</p>	<p>Acknowledged.</p>	Oct 2 2025	<p>No Action</p>	<p>No action.</p>
147	Montrose Environmental	Mar 3 2025	<p>A post construction monitoring program. No discussion on any monitoring of downstream impacts.</p>	<p>Acknowledged. GEO Morphix will include monitoring of downstream impacts as part of the post-construction monitoring program. Refer to response to Montrose comment #134.</p>	Oct 2 2025	<p>Comment Addressed per guidance in Table 72 of the LSS.</p>	<p>No action.</p>

RESPONSE MATRIX TO SECOND SUBMISSION (August 2025) COMMENTS - SCOPED TO SUBWATERSHED STUDY COMMENTS ONLY Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)							
#	REVIEWER	DATE RECEIVED (1)	REVIEWER COMMENTS (1)	FORMAL RESPONSE (1)	DATE RECEIVED (2)	REVIEWER COMMENTS (2)	FORMAL RESPONSE (2)
Additional Comments Regarding Phase 1 Function Servicing Report							
a	Montrose Environmental	Mar 3 2025	<p>In recent meetings (February 10 and 18, 2025) held between the Town and the Landowner Group's consultant team, and attended by the Montrose Review Team, background context was received regarding the July 2024 LSS report and the additional work that had been completed and presented in the subsequent FSR report (September 2024).</p> <p>In the February 18, 2025, meeting between the Town and Alloa consultant team, it was agreed that the Review Team would complete a high-level review of the FSR document. Given the scoped review, the subject comments do not provide a comprehensive, complete and integrated documentation of all gaps and deficiencies. Instead, the comments focus on missing information and FSR report completeness. The lack of comments on any content does not indicate that content within the current FSR is considered to be complete.</p> <p>Upon review of the comments, as suggested in the February 18, 2025, meeting, focused workshops could be held to discuss comments and report content, in order to support FSR completion resubmission.</p>	The clarification regarding the scope and focus of the Montrose Review Team's comments is noted, and it is understood the comments are intended to highlight priority gaps in support of continued refinement of the FSR. The Consultant Team is open to participating in focused workshops to ensure alignment and support the completion of the FSR resubmission.	Oct 2 2025	NOTE: FSR not part of current review	No action.
1	Montrose Environmental	Mar 3 2025	FSR GENERAL COMMENTS Any new Information which contributes to the LSS contained within the FSR should be included and integrated within the Local Subwatershed Study (LSS) report.	Noted.	Oct 2 2025	NOTE: FSR not part of current review	No action.
2	Montrose Environmental	Mar 3 2025	HYDROGEOLOGY Per the FSR (Section 1, Pg. 8), the report should be "read in conjunction" with Alloa Phase 1 Environmental Implementation Report (EIR). As you are aware the EIR has yet top be reviewed by the Montrose Review Team; the EIR report was cross-referenced to support review of the FSR. Very little of the information presented in the EIR is summarized in the FSR with respect to groundwater. A summary of relevant materials completed in other studies should be include in the FSR to provide a basis for the recommendations and analyses completed in the FSR.	Acknowledged. The FSR stated that the report should be read in conjunction with the EIR. Montrose should review the EIR. A summary of relevant materials completed in other studies has been included in the FSR.	Oct 2 2025	*Comment Partially Addressed* review team scope does not currently include review of the EIR	No action.
3	Montrose Environmental	Mar 3 2025	There is no discussion of Ecologically Sensitive Groundwater Recharge Areas (ESGRA), Potential Discharge Areas or Areas of Concern (AOC) in the FSR or EIR. Review of Oak Ridges Moraine Groundwater Program (ORMGP) data indicates that these do occur in the study area and therefore would thereby pose a constraint to low impact development (LID) best management practices (BMPs). The FSR (and also the EIR) reports should include discussion/mapping of groundwater features within the study area and consider opportunities and constraints these pose to LID-BMPs.	Acknowledged. A discussion of potential discharge areas of concern and ecologically sensitive groundwater areas has been provided in section 7. The areas of concern and ESGRs generally coincide with existing features and therefore any discussion on the potential limits or constraints on LID design will already be addressed. Further discussion is provided since additional data has been collected. The LSS relies on site specific data as a primary source of information, not regional scale data such as the ORMGP.	Oct 2 2025	*Comment Partially Addressed* The section on ESGRAs has been added, please consider the following: (1) Although local data show limited groundwater recharge, ESGRAs are still important because they support groundwater flow systems that serve an ecological function. Even small amounts of recharge can be critical if they sustain downstream ecosystems. (2) Incorporating ESGRA mapping on one of the existing maps would help clarify some of the descriptions provided in the text. (3) Incorporating the ESGRAs discussion into the impact assessment section, addressing what kind of impacts (if any) would be expected by recharge reductions in these recharge areas and how the these impacts will be mitigated/managed.	1) Noted. Discussion of ESGRAs has been included in Section 7.1.8 - Ecologically Significant Groundwater Recharge Areas. 2) Addressed. Figure 14 has been created to show ESGRAs on the study area. 3) Discussion of impacts to ESGRAs, including the types of impacts and potential mitigation techniques have been provided in Section 11.2.3 and Section 18.1.1
4a	Montrose Environmental	Mar 3 2025	<p>In general, the discussion on hydrogeological constraints for LID-BMPs is lacking in detail and content as follows:</p> <p>a. EIR indicates that most of the study area is covered by soils that are conducive to LID-BMPs (possible typo in Figure 18 of EIR which states "conductive", should this be conducive), while also stating the underlying Halton Till is in an aquifer that allows very little groundwater recharge. Are the soils permeable enough to laterally drain any focused infiltration? Further explanation to demonstrate this potential is required to illustrate that the vertical drainage through the low permeability tills is feasible for infiltration-based LID-BMPs.</p>	Localized hydraulic conductivity testing was conducted at MW405, MW6 and MW9. The shallow hydraulic conductivity at MW405 was determined to be on the order of 10-8 cm/s whereas at MW6 and MW9, soils possess a hydraulic conductivity on the order of 10-7cm/s. A hydraulic conductivity of 10-6 cm/s is equivalent to an infiltration rate of 12 mm/hr or less according to the CVC LID guide. Although localized infiltration testing has not been completed, siltier or sandier soils are more conducive to infiltration and therefore LIDs shall be concentrated in those areas. Please refer to Section 18.	Oct 2 2025	<p>Comment Partially Addressed. General Comments on Proposed LID feature Locations (Figure 27, Section 17.2.2 and 18.1.1): the discussion on LID feature feasibility metrics appears to focused on the saturated hydraulic conductivity and the interpretation that the observed groundwater levels represent a potentiometric surface, however please consider justifying how observed upward vertical gradients and the uncertainty on the depth of the water table may impact the feasibility of infiltration-based LID measures. It is stated in Section 7.1.7 (Page 40) - "The water table within the Primary and Secondary Study Area, is expected to be a shallow..." however the implication of this on the proposed LID measure locations (Figure 27) requires more context.</p> <p>New Comment - from Appendix K - Based on pre- and post-groundwater infiltration, the LSS team propose sizing infiltration LIDs assuming high infiltration rate deficit of 146 mm, but the low infiltration scenario, which we consider more representative, would only require 41 mm. This high infiltration scenario but this may overestimate infiltration and recharge capacity, and could result in flooding/runoff so will require site-specific groundwater level monitoring and infiltration testing in future study stages. However, based on statements in Appendix K end of pipe facilities are sized to handle the regional storm so there should be capacity there but depending on the type of infiltration-based LID could be problematic on sites if infiltration capacity is overestimated.</p>	<p>Feasibility metrics to assess LID potential are noted in Section 7.1.1 and site specific monitoring recommended at the time of SPA to address site specific design considerations.</p> <p>New Comment - The purpose of the surface water feature-based water balance completed for all of the subject wetlands as part of the LSS was to confirm that sufficient runoff is provided to each wetland such that pre-development runoff conditions are met as a minimum. Through future design stages/studies, further detailed analysis will be completed for the surface water FBWB to evaluate the ponding depths in each wetland with respect to ecological requirements. As part of this detailed FBWB during future studies, it will be confirmed that the ponding depth in each wetland is sufficient for ecological function, where, if required, any excess of runoff under post-development conditions will be mitigated through a refinement of the wetland catchment areas to provide an appropriate spill from the wetland(s) to the downstream features while maintaining a suitable ponding depth.</p>
4b	Montrose Environmental	Mar 3 2025	b. No discussion on the areas of the domain where Oak Ridges Aquifer Complex (ORAC) aquifer material could be subcropping below soils; review of the ORMGP suggests that there could be substantial subcropping below soils within the secondary plan area. The FSR should discuss the ORAC and implications for potential artesian conditions for the proposed FSR.	Acknowledged. Discussion of the depth to the Oak Ridges Morain Aquifer Complex is discussed in Section 7. There is no site specific information indicating the potential that the ORAC is subcropping in the secondary plan area.	Oct 2 2025	Comment Partially Addressed. See comment 81 in Hydrogeological Impact Assessment. Please provide source of information to support statements on the expected elevations of the ORAC deposits across the site.	Sources provided within Section 7.1.4 of the LSS.

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4c	Montrose Environmental	Mar 3 2025	c. The FSR uses a depth to water table cutoff of 2 m with a local contoured water table. When compared to the ORMGP there appears to be significant conflict. Most of the north half of the study area is either ESGRA, an area of potential groundwater discharge, or water table <1 m in depth. Has this conflict been identified and how has this been mitigated?	It is understood that the water table featured in the ORMGP is representative of a modelled surface using water levels from wells screened within 20 mbgs. Although, as seen on the Alloa property, the levels represented in the ORMGP could be perched groundwater conditions or representative of a potentiometric surface and not true groundwater table. Further discussion of the potentiometric surface and unsaturated zone is discussed in Section 7. The LSS relies on locally collected site specific information over largely generalized, modelled and regional scale data that has not been independently field verified at the specific location.	Oct 2 2025	Comment Partially Addressed. ORMGP Water Table Map is not modelled but an interpolation from water well records and stream	Noted. No action required.
4d	Montrose Environmental	Mar 3 2025	d. Based on review of the ORMGP, it would appear that only the southern half/third of Study Area would be amenable to infiltration-based LID-BMPs; this is not reflected in the FSR.	The LSS relies on locally collected site specific information over largely generalized, modelled and regional scale data that has not been independently field verified at the specific location. Please refer to section 18. As discussed above, infiltration is theoretically feasible in the areas where hydraulic conductivity is on the order of 10-6 cm/s or greater. Additionally, areas where sufficient fill creates separation to the water table will provide opportunity for sustained downward gradients.	Oct 2 2025	Comment Partially Addressed. See response to 4a in FSR Comment Section	The location of suitable LID BMP measures is shown on Drawing 3E (included in the Scoped Servicing Study in Appendix K of the LSS) and is based on the proposed grading and groundwater information provided by Crozier. With respect to the target recharge volumes, the targets were based on the most conservative sensitivity analysis scenario (Low Runoff, which implies the most required recharge). This approach ensures that sufficient consideration is provided for LID sizing at this early stage. The LID designs will be refined as the continuous model is updated / calibrated when sufficient data becomes available. Areas conducive to LID implementation should be cross referenced with Figures 14 and 15 which illustrate groundwater dependent features and areas with infiltration potential. Final feasibility of LIDs, including sizing, should be completed at a site specific level.
5	Montrose Environmental	Mar 3 2025	The FSR estimates a groundwater infiltration (GWI) deficit of ~100-160 mm/yr due to planned development. The FSR plans on mitigating this deficit with LID-BMPs; based on submitted reporting, as outlined in the comments above, this approach does not seem attainable. Please discuss.	Please refer to section 18. As discussed above, infiltration is theoretically feasible in the areas where hydraulic conductivity is on the order of 10-6 cm/s or greater.	Oct 2 2025	Comment Partially Addressed. See response to 4a in FSR Comment Section	The location of suitable LID BMP measures is shown on Drawing 3E (included in the Scoped Servicing Study in Appendix K of the LSS) and is based on the proposed grading and groundwater information provided by Crozier. With respect to the target recharge volumes, the targets were based on the most conservative sensitivity analysis scenario (Low Runoff, which implies the most required recharge). This approach ensures that sufficient consideration is provided for LID sizing at this early stage. The LID designs will be refined as the continuous model is updated / calibrated when sufficient data becomes available. Areas conducive to LID implementation should be cross referenced with Figures 14 and 15 which illustrate groundwater dependent features and areas with infiltration potential. Figures 14 and 15 should also be used to prioritize final LID placement in catchments with groundwater supported features. Final feasibility of LIDs, including sizing, should be completed at a site specific level.
6	Montrose Environmental	Mar 3 2025	There are three or more wetlands deemed to have the potential of being groundwater fed. The EIR uses construction dewatering analytical solutions in assessing the hydrogeological impacts for Feature (Wetland) based water balances. It is unclear in the FSR how these groundwater dewatering volumes are used for the Water Balance Risk Evaluation. In the EIR and FSR, the hydrological changes to the groundwater-fed wetlands (post-development) are deemed to be a Low or Medium risk based on a dewatering volume thresholds and length of dewatering (Table 14 in the EIR). No context or justification is provided on the use of these criteria in assessing the risks to feature-based water balances.	Understood. Justification is provided in the report in Section 11. Preliminary dewatering estimates were determined based on assumptions of depth of excavation and sizing of development features in the concept plan however detailed discussion of dewatering is premature at this stage of development.	Oct 2 2025	Comment addressed	No action.
7	Montrose Environmental	Mar 3 2025	No discussion of groundwater function in the study area is provided, nor regarding how linkages between groundwater recharge and discharge would be maintained.	Further discussion of groundwater function in the area is provided within Section 7 and 18 of the report. Data has been provided to support groundwater function on site.	Oct 2 2025	Comment Partially Addressed. See comment 9 in Baseline Inventory. Establishing the groundwater function is stated as an objective throughout the report, and data presented and discussed in Section 7.1. Please provide additional text at the end of Section 7.1 that ties together all the interpretations made in 7.1.7 into a baseline conceptual model of groundwater flow, as per the TOR Section 2.2.3.	Addressed. Groundwater dynamics have been included in Section 7.1.9.
8	Montrose Environmental	Mar 3 2025	HYDROLOGY AND HYDRAULICS The report content provided in both the LSS and FSR documents were compared to the requirements outlined in the LSS TOR. A summary of FSR report conformance to the TOR is provided below (see chart in comment document) – any missing items should be addressed and included in the appropriate reporting (FSR and LSS). As noted in the covering letter, it is expected that the updated LSS and FSR will be in full compliance with the TOR (October 2024), and notably include updated Hydrologic and Hydraulic modelling.	LSS and the FSR will be updated to be in conformance with the TOR	Oct 2 2025	Comment Not Addressed: Requirements per TOR remain outstanding: - Hydrologic analyses, duration analyses, and water budget analyses within CVC jurisdiction - Hydrologic analyses at key downstream locations to demonstrate full post-to-pre control is achieved - Hydraulic analyses for proposed watercourses, with existing and proposed crossings, to establish floodlines	The LSS identified the appropriate SWM criteria applicable to lands within the CVC jurisdiction, including quality, quantity and erosion control, as well as recharge requirements/water budget. Refer to Section 17.4 of the LSS for the applicable SWM criteria. These criteria were established in the approved Huttonville Fletchers Subwatershed Study (AMEC). As the SWM criteria require control of post-development flows to pre-development unit rates, there will be no impact downstream, since the pre-development flow rates from the subject lands have already been accommodated into the design downstream. A downstream capacity assessment was also completed for the Mayfield Road crossings to Fletcher's Creek, as discussed in Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS). As per the findings of the downstream impact assessment for Fletcher's Creek, the applied SWM criteria to the subject lands is sufficient such that there are no downstream impacts related to the subject development.

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9	Montrose Environmental	Mar 3 2025	As noted in our comments for the LSS peer review, the selection of the VO modelling for continuous simulation requires justification, recognizing that the model was originally developed and calibrated by TRCA for synthetic design storms only.	It was agreed with TRCA and Town staff through various meetings and workshops that the approved LSS VO model for Etobicoke Creek was acceptable for the continuous simulation.	Oct 2 2025	Comment Not Addressed: Technical justification for the selection and use of VO for design storm simulation, and for continuous simulation for water balance assessment and duration analyses for erosion assessment should be provided within the LSS. This is of particular importance, given the other models which have been developed and applied within the area. The technical justification should also be provided for the application of the HSP-F modelling for the Fletcher's Creek and Huttonville Creek Subwatersheds.	As per Section 3.2 of the Scoped Servicing Study (provided in Appendix K of the LSS), Etobicoke Creek and its tributaries have been modelled using Visual OTTHYMO in the Etobicoke Creek Hydrology Update Study (2013). This is the report / source of targets that was used for design and verification of the Mayfield West Phase II lands east of Chinguacousy Road. TRCA provided the ECHUS model for use in the LSS for the Alloa lands. This is also the model that is used for flood hazard delineation in the TRCA's regulatory mapping / hydraulic modelling. To provide a consistent approach for the Alloa lands, the majority of which are adjacent to the Mayfield West Phase II lands and within the areas already incorporated into the ECHUS model, it was agreed that the ECHUS model should be used for the study area. Similarly, the portion of the study area within CVC's jurisdiction was already incorporated into the existing / approved modelling for the Huttonville/Fletcher's system. Deviating from use of the approved models for these watersheds would result in inconsistencies and complications as it relates to application of SWM criteria and future verification simulations.
10	Montrose Environmental	Mar 3 2025	As noted above, hydrologic analyses for the stormwater management facility rating curves advanced in the FSR remains to be completed. Per current Provincial Planning, these analyses should assess the performance of the stormwater management facilities at the watershed scale, and particularly should confirm that the proposed development and stormwater management plan would not increase peak flows at the drainage outlets for the study area, nor at the designated downstream FVAs.	The hydrologic model results have been summarized at all outlets from the study area and to a sufficient distance downstream to demonstrate that there are no impacts to peak flow and peak flow timing for the range of design events.	Oct 2 2025	Comment Not Addressed: ref. to SSS; this information should be included within the LSS per the Terms of Reference and for completeness of the documentation. This is of particular importance given that the LSS represents that parent study to support the Secondary Land Use Planning process.	Acknowledged. It has been confirmed that there are no downstream impacts - the developed portion of the subject lands within the Etobicoke Creek watershed are controlled to 60% of the existing Regional storm flow rate, using the most conservative unit rate established in the ECHUS study; therefore, the Regional flows downstream are lower than existing conditions. The downstream impact assessment is discussed in Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS).
11	Montrose Environmental	Mar 3 2025	Section 2.6.4 of the FSR provides an overview of the water balance assessment. Based upon the information presented, it is understood that a hybrid approach was applied, whereby the VO modelling was used to establish the hydrology based on continuous simulation, and PCSWMM was used to assess the hydraulics. Additional information is required to justify the application of this hybrid methodology. This should include characterization of the features and key components of the hydroperiod.	PCSWMM was used to assess routing of the continuous VO model hydrologic output through the wetlands under pre and post-development conditions. PCSWMM was selected for this purpose in order to evaluate the impacts to the water level in the wetlands under pre and post-development conditions. Additional information regarding this hybrid approach has been updated in Section 2.6.4 in the FSR which is provided under separate cover from the latest LSS submission.	Oct 2 2025		No action.
12	Montrose Environmental	Mar 3 2025	Table 4-5 provides a summary of the performance of hydraulic structures, specifically related to conveyance capacity prior to overtopping. The hydraulic analyses should include an assessment of freeboard and clearance, in accordance with the current Drainage Design Standards.	The hydraulic analysis has been updated to included the requested information for existing and future (preliminary) structures.	Oct 2 2025	Comment Partially Addressed: ref. to SSS. Comment partially addressed regarding LSS, hydraulic analysis for structures per Table 17, Section 7.4.4 focusses on conveyance capacity of structure prior to overtopping; assessment of freeboard, depth of overtopping, and clearance as appropriate should be included.	All proposed crossings are designed to convey the Regional storm and therefore no overtopping will occur. While these details can be provided, they do not impact the overall conclusions of the LSS or channel block sizing.
13	Montrose Environmental	Mar 3 2025	GEOMORPHOLOGY GEO Morphix, 2024 - Fluvial Geomorphology Assessment & Conceptual Natural Corridor Designs supplied in FSR (September 16, 2024) presents more recent and different information than included in the LSS (June 28, 2024). The LSS will need to be updated to include the recent information.	The second LSS submission will be updated to reflect the most recent project information.	Oct 2 2025	No current action	No action.
14	Montrose Environmental	Mar 3 2025	As noted in the cursory review of the LSS, the Conceptual Natural Corridor designs (FSR Appendix F) are at a stage with substantial detail beyond the functional level. With that said, the Natural Channel Design analysis presented in the FSR provides a functional level of analysis for changes in hydrology, hydraulics, and riparian storage. Appendix F needs a further review by the Montrose Review Team for completeness.	We respectfully disagree with the reviewer's assertion that the design detail provided in the FSR exceeds the appropriate level for this stage. The level of detail included in the Conceptual Natural Corridor designs is considered appropriate for the FSR, given the complexity of the proposed realignment and the need to demonstrate how key hazard, hydraulic, and functional objectives are being addressed. The timing of the project also necessitated a more advanced level of concept development to support planning and decision-making. The designs are intended to remain conceptual and will continue to be refined through subsequent stages of design and review.	Oct 2 2025	No current action	No action.
15	Montrose Environmental	Mar 3 2025	Unitary rates from previous studies were utilized, similar to the LSS. Montrose Review team needs to complete further review of erosion threshold and exceedance analyses to assess applicability to the study area.	Refer to response to TRCA comment #1 and responses to Montrose comments #25, #99, #143.	Oct 2 2025	No current action. Comment relates to FSR. See responst to comment 49 re: erosion threshold analysis	No action.
16	Montrose Environmental	Mar 3 2025	Exceedance analysis "Erosion Mitigation Assessment" only briefly mentioned in FSR with reference to Appendix F. It is noted in the FSR that "the proposed SWM Plan is effective in mitigating downstream erosion impacts." Generally, there should be more discussion on this aspect in the FSR document to provide supporting details and results to support the statement (e.g., pre to post exceedances). Tabular summaries, with interpretation are considered to be reasonable to include but have not been included in the FSR. The erosion analysis presented in Appendix F appears to be complete but has not yet been reviewed in detail.	Acknowledged. Further details regarding the Erosion Mitigation Assessment will be added to the next submission of the FSR.	Oct 2 2025	FSR not reviewed again as part of current scope. However, exceedance analysis has been presented in the LSS. Please refer to H&M New comment 14 (below) regarding a discussion on the modelled values and exceedance % that should be resolved.	Noted. Refer to the response to New Comment 14 below.
17	Montrose Environmental	Mar 3 2025	MUNICIPAL SERVICING As noted in the cursory review of the FSR the municipal servicing and roadway design are at a stage with substantial detail beyond the functional level. Sections 5, 6, and 7 of the FSR require further review by the Montrose Review Team for completeness.	Acknowledged	Oct 2 2025		No action.

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Additional Hydrology Comments Based Upon Review of New Information Included in Second Submission							
1	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Table 15 of Section 7.4 indicates that portions of the study area lie within the Fletcher's Creek and Huttonville Creek Subwatersheds within CVC jurisdiction. However, the LSS does not include a characterization, impact assessment, and management recommendations for these lands. This information is required per the TOR and remains outstanding in the document.	With respect to characterization and management recommendations for the lands within the Huttonville / Fletcher's watersheds, the approved HFSWS (AMEC) is the guiding document for SWM criteria in these lands. Criteria have already been prepared for the entirety of the Huttonville/Fletcher's catchments within the Alloa lands. A downstream capacity assessment for Fletcher's Creek was completed, ss discussed in Section 3.5.4 of the Scoped Servicing Study (provided in Appendix K of the LSS). As per the downstream assessment, it is confirmed that there are no downstream impacts related to the subject development.
2	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	The information in Table 16 of Section 7.4 indicates that sizing of stormwater management facilities, erosion assessment, and feature-based water balance are being deferred to the FSR stage. We note that erosion analyses have been partially completed, and are discussed through the report and in the appendices, hence this table should be revised to reflect the inclusion of this information within the LSS.	The LSS included sizing for all SWM facilities (Sections 3.5.2 and 3.5.3 of the Scoped Servicing Study provided in Appendix K of the LSS), an erosion assessment (Section 3.5.5 of the Scoped Servicing Study in Appendix K of the LSS) and a feature-based water balance (Section 3.6.3 of the Scoped Servicing Study provided in Appendix K of the LSS). The erosion analysis was also completed for the range of sensitivity scenarios, as discussed in the Sensitivity Analysis memo provided in Appendix C of the Scoped Servicing Study.
3	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	The SWM criteria advanced in previous studies are recommended in the LSS to be used to mitigate flooding and erosion impacts from the proposed development. The studies which established these criteria did not include the development within the Alloa area as part of the analyses to establish the criteria, hence it remains to be demonstrated that the criteria would provide the adequate erosion and flood control. Further, requirements for Regional Storm control remain to be assessed; this is of particular importance given the presence of the downstream FVAs and FVRs, and recognizing the potential influence of climate change.	While the original Huttonville–Fletcher's Subwatersheds Study (HFSWS) did not contemplate development north of Mayfield Road within the Alloa study area (these lands were outside the urban boundary at the time), it applied broad imperviousness assumptions for the overall Huttonville–Fletcher's area. Those assumptions have been refined through the FSR and detailed design studies within the HFSWS catchments to reflect actual land-use and drainage configurations. Based on the verifications completed for lands south of Mayfield, the target volumes were sufficient to meet the flow targets despite increases in imperviousness above and beyond the original HFSWS assumptions. Refinements to imperviousness does not change the HFSWS flow and erosion targets, which were established from existing-conditions hydrology; at most, it may necessitate incremental storage beyond the volumetric targets, to be confirmed at the draft plan stage. Accordingly, the HFSWS catchment targets remain unchanged, while site-specific requirements for future development will be finalized through the FSR/detailed design.
4	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 7.4.3 states that the updated future scenario VisualOTTHYMO model results were used for the existing conditions HEC-RAS analysis. Additional justification is required for this approach, since conventional practice would use existing conditions hydrologic modelling to establish existing conditions floodlines for comparison against future conditions hydrology and hydraulics representing development and watercourse realignment.	The "future" scenario refers to TRCA's model terminology. The "future" VO scenario includes the study area as existing conditions (i.e., it represents the future conditions downstream, in recently approved or constructed subdivisions). Therefore, the model used to evaluate existing conditions (hydrology and hydraulics) was correct, although we agree that the naming may be confusing.
5	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Table 17 of Section 7.4.4 provides a summary of hydraulic structures in the area. It is unclear from the text in the report whether this inventory is based upon surveys completed through the study area or an inventory based upon previous modelling; if the latter, it should be clarified whether the hydraulic structure inventory has been verified by any site-specific surveys or investigations. Further, the LSS should clarify whether hydraulic analyses, including the hydraulic structures, have been completed; we note that corresponding HEC-RAS hydraulic models for existing and proposed conditions with hydraulic structures have not been included with the submission.	As noted in Section 4.1.2 of the Scoped Servicing Study, the existing hydraulic structures are based on the approved TRCA HEC-RAS model that was provided for use, with refinements made based on local ground surveys and culvert surveys where available (e.g. Chinguacousy Road). Hydraulic models with structures in place for both existing and proposed conditions were included in the digital submission files - these models were used for establishing the flood mapping presented in the LSS.
6	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	The floodplain mapping presented in Drawing 3B of Section 7.4.4 indicates changes in the floodplain extent between the hydraulic modelling completed for the LSS and the original floodline mapping prepared by TRCA. The LSS should clarify whether the TRCA floodlines are being used to establish the limit of development, or if the LSS floodlines are proposed to be used. In either event, the recommendation will be subject to approval by TRCA as the regulator.	The TRCA mapping was included for comparison only, to validate the LSS flood mapping results. Please refer to Scoped Servicing Study Section 4.1.1 and LSS Section 7.4. The SSS/LSS "updated"/ Urbantech floodlines are proposed to be used to represent existing conditions. TRCA will confirm which results will be adopted into their mapping / regulated limits.

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7	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 7.4.5 states that unsteady state modelling using HEC-RAS 1D was agreed-to by TRCA; supporting documentation is required regarding TRCA acceptance of this approach.	HEC-RAS 1D (steady-state) was used to establish the existing and proposed flood elevations between Mississauga Road and Chinguacousy Road (and beyond). These models were used for sizing the proposed crossings and evaluating existing crossings. HEC-RAS 1D (unsteady state) was accepted for use in the Riparian storage modelling to properly evaluate the impacts of riparian storage loss west of Mississauga Road. All model scenarios (steady/unsteady/2D) were included in the submission. The 2D modelling approach, including mesh development and parameterization were reviewed, commented on, and accepted by TRCA following revisions. Town staff were circulated on the submissions related to the 2D modelling west of Mississauga Road. The documentation regarding the 2D model, TRCA comments, and various presentations and e-mails are included in Appendix C of the Scoped Servicing Study (SSS can be found in Appendix K of the LSS).
8	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	HEC-RAS 1D and 2D modelling only assessed riparian storage. Hydraulic analyses to validate floodlines and confirm requirements for replacement structures remain to be completed. Further, additional information is required within the LSS regarding the development and parameterization of the tool (i.e. what mapping was used to develop the mesh, approach applied to establish breaklines, basis for establishing Manning's 'n' values, etc.).	See preceding response.
9	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Based upon review of the HEC-RAS 2D model, it is understood that the analyses applied Diffusion Wave, rather than Momentum. Additional justification is required for the application of Diffusion Wave, specifically to correlate the methodology to the physiography of the terrain.	The latest iteration of the 2D modelling utilized the Momentum equation as noted in Section 4.1.1 of the Scoped Servicing Study and Section 7.4 of the LSS.
10	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	The hydrologic analyses for proposed conditions terminate at the study area boundary, and do not extend further downstream to provide a watershed scale assessment. This is considered of particular importance, recognizing the presence of the Downtown Brampton flood vulnerable area (FVA) downstream.	The model results presented in the report indicate a reduction in peak flows at Chinguacousy Road and McLaughlin Road. The model results for downstream nodes were reviewed and it was concluded that the reduction in flows persists to Downtown Brampton and beyond. Refer to Appendix C of the Scoped Servicing Study (SSS can be found in Appendix K of the LSS) for the downstream impact assessments.
11	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	The text in Section 11.3.1 indicates that hydrologic analyses were completed for the 2 year through 100 year storm events with proposed stormwater management in place. The results in Table 52 indicate that the proposed stormwater management strategy would result in residual increases to peak flows for the locations assessed, indicating the need for further refinement to the stormwater management plan and sizing criteria. As noted previously, the hydrologic analyses for existing conditions, future uncontrolled conditions, and future conditions with recommended SWM should extend further downstream of the study area, and should include all key locations, particularly the FVAs and FVRs, to clearly demonstrate that the stormwater management strategy would provide the required post-to-pre control at all key downstream locations.	The model has been extended beyond McLaughlin Road and a comparison of Regional flows was completed. This comparison demonstrated a reduction in flows at all nodes, and zero change at the QEW. Please refer to the downstream impact assessment memos in Appendix C of the Scoped Servicing Study (SSS can be found in Appendix K of the LSS) .
12	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Table 53 in Section 11.3.3 is labelled "Proposed vs. Existing Peak Flows At Key Nodes", however the information provides the geometry and type of hydraulic structures at various locations. The information in the table should be updated, or the table retitled as appropriate.	The table heading / content in the LSS has been revised.
13	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Results of hydraulic analyses presented in Table 55 of Section 11.3.4 indicate reductions in riparian storage, and the results presented in Table 56 indicate residual increases in peak flows at the limit of the study area. Additional analyses are required to determine whether the residual increase in peak flows would result in an increased flood risk downstream. If so, then revisions to the stormwater management plan and/or criteria will be required in order to achieve the requisite post-to-pre control.	The riparian storage analysis demonstrated that, using a dynamic hydrograph approach, loss of over 200,000m3 of storage west of Mississauga Road had little effect on flow attenuation at Chinguacousy Road. This was discussed with TRCA and Town staff and it was agreed that the large flood volume west of Mississauga Road was not required to be compensated. TRCA has agreed to this negligible increase in flows per their recent comments. Refer to the historical correspondence regarding the general modelling approach in Appendix C of the Scoped Servicing Study (SSS can be found in Appendix K of the LSS) .

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14	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 11.5.4 identifies the cumulative effective work index as the most appropriate index for evaluating erosion impacts and assessing the effectiveness of the mitigation strategy, and further indicates that results with more than 5% difference are considered "potentially significant" to result in a change in erosion potential. The results presented in Tables S8 and S9 of this section indicate that, for the baseline hydrologic model, the proposed stormwater management strategy would result in residual increases of 5.2% and 6.29 % for the two sites assessed, thus exceeding the 5% difference. Furthermore, as noted in our comments for Appendix K, the results of the sensitivity analysis would suggest that the low runoff model would most appropriately be applied for the erosion assessment, given the lack of model calibration and validation for erosion analyses, thus suggesting residual increases of 24.05% and 32.64% for the sites evaluated. In the absence of a calibrated and validated hydrologic model, further refinement to the stormwater management plan is required achieve an acceptable mitigation.</p> <p>This section further states that the proposed stormwater management plan "effectively" mitigates the risk of erosion. This conclusion is not supported by the analyses presented in this section, nor the information provided in Appendices Appendix K and Z. As such, further refinement of the stormwater management strategy is required to establish the erosion control strategy for the proposed development.</p>	Additional text has been added to Appendix Z Section 7.2 to clarify the relevance of the erosion exceedance results under the low flow Scenario and to support the conclusion that the stormwater management plan effectively mitigates erosion risk. Summary text from Appendix Z Section 7 has been added to the LSS (Section 11.7.4).
15	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	With the exception of notes provided on Drawing 3E, the LSS is silent regarding requirements to address stormwater management criteria per the Town's CLI-ECA. Discussion of the criteria required per the Town's CLI-ECA, and demonstration that the recommended stormwater management plan would satisfy these criteria, remains outstanding from the submission.	The specific requirements and design of measures to meet the CLI-ECA requirements is within the scope of the FSR and detailed design. The CLI-ECA targets are mentioned in the LSS (Section 17.4.4) and SSS (Section 3.3.4)
16	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Additional information is required regarding the model parameterization for future land use conditions, particularly the impervious coverages assumed for the respective land uses, the subcatchment boundary plan, and the parameterization for the pervious portion of the soils for infiltration.	Impervious values previously agreed to with TRCA for the Mayfield West Phase II lands were applied to the various land uses in the Secondary Plan area. The assumed land use impervious values are summarized in Table 3-8 in Section 3.5.1 of the Scoped Servicing Study, provided in Appendix K of the LSS.
17	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Table 62 in Section 12.1 notes the proposed floodplain outside the Secondary Plan limits may change due to the Highway 413 corridor, and also speaks to the floodplain within the Etobicoke Creek. This table should include commentary on flood impacts and mitigation strategies within the Huttonville and Fletcher's Creek Subwatersheds, and should also include commentary on the recommendations to provide flood control for the 2 -100 year return period/frequency flow conditions as appropriate. Further, the commentary in this table regarding erosion potential (see Stream/Fluvial Geomorphology) is subject to revision, based on the comments previously provided regarding the continuous simulation modelling and the duration analyses from the results.	All areas within the Huttonville / Fletchers watershed are subject to the flood control criteria and erosion criteria identified in the HFSWS and LSS.
18	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 17.3 of the LSS presents the stormwater management criteria advanced in other studies for the respective subwatersheds containing portions of the development area. The criteria presented in this section have not been tested for the proposed development within the Alloa Secondary Plan, hence should be tested using the approved hydrologic models for the LSS, to verify and refine the sizing criteria as appropriate. Further, it is suggested that a consistent sizing criteria be provided within the study recommendations (i.e. unitary volumes with corresponding unitary release rates); this would require a modification to the stormwater management recommendations for the Etobicoke Creek Watershed compared to the current stormwater management criteria advanced by TRCA which is unitary discharge rates only.	The ECHUS criteria and corresponding erosion targets established in the approved Mayfield West Phase II lands were applied to the Etobicoke Creek catchments. The HFSWS criteria were applied to the lands draining to Huttonville/Fletchers. The subject lands were considered in these approved studies and therefore the existing targets / unit rates are acceptable for use. It is at the FSR stage when the proposed SWM blocks and general strategy must be verified against the targets established in the approved studies.
19	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 18.1.4 identifies an LID capture strategy, achieving an effective 11 mm capture through a combination of surface storage within Wetland 7 and 4 mm capture. It is unclear from the information presented in the LSS how the combination of these two strategies would achieve the equivalent 11 mm capture; additional information is required in this regard. Furthermore, this section includes some general discussion about candidate LID measures, however this discussion should also reflect the hierarchal approach for stormwater management per the current CLI-ECA and the draft LID guidelines from MECF.	As per Section 3.6.1 of the Scoped Servicing Study (provided in Appendix K of the LSS), recharge targets for the baseline scenario, high runoff scenario and low runoff scenario was determined to be 1.5 mm, 1.0 mm and 2.0 mm, respectively, in order to meet post to pre-development annual infiltration. In addition, as per Section 3.5.5 of the Scoped Servicing Study (provided in Appendix K of the LSS), an 11mm target retention volume to reduce erosion impacts via LIDs was also identified. In applying the 11 mm retention target, both the erosion and water balance requirements are met. This has been discussed in Section 11.4 of the LSS.
20	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 19 provides a brief summary of site-specific studies, however no details are provided regarding the key components of the studies. Additional information should be provided in this regard to streamline the transition from the Secondary Plan to subsequent stages of planning and design.	Addressed. Additional information has been included in Section 19.

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21	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 20 provides a summary of the requirements per the CAMP. The duration of flow monitoring is limited to two (2) years following 90% buildout and initial facility cleanout, presumably focusing on monitoring performance for stormwater management facilities. The scope of the CAMP should be expanded to include monitoring of LID facilities, and further should include establishing permanent monitoring stations for continuous flow and rainfall data to validate the performance of the stormwater management infrastructure. The scope of the CAMP should also be integrated with the Town's monitoring requirements per the CLI-ECA.	Table 74 in Section 20, Comprehensive Adaptive Management Plan and Monitoring Plan, has been revised to include post-construction monitoring of LID features as part of the CAMP. Post-construction monitoring to continue for a period of 3 years following 90% buildout. Any permanent monitoring requirements such as weather station and rainfall data collection shall be assumed by the Town following the 3-year post-construction monitoring period and should be included as part of the Town's CLI-ECA requirements.
22	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Sensitivity Analysis Memorandum:	Please see responses below.
23	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	a. Section 4.3 – Figure comparing unitary flows from HFSWS, ECHUS and sensitivity analyses shows that the unitary flows from the LSS model are lower than the unitary SWM criteria flows for the ECHUS for return periods at or above the 25 year, and are comparable to the ECHUS unitary flows for the for the 2 year – 10 year return period, and generally higher for the baseline and high infiltration scenarios. The target flows from the ECHUS are understood to be based on an over-control strategy within the headwaters, in order to achieve stormwater management at key locations within the watershed. The lower unitary flows for the less frequent but more formative events, as per the LSS model, suggest that the revisions to the LSS hydrologic model have resulted in more constrained targets for these events, and hence should be applied for establishing stormwater management criteria. This should be discussed and confirmed with TRCA.	The intent of the sensitivity analysis was to provide a range of results to assess continuous-model related items (erosion, water balance). The comparison to the ECHUS return period flows and other studies (HFSWS) was completed at the request of the peer review team to provide a further level of comfort that the continuous results were in the appropriate range relative to other studies. The continuous model and frequency analysis was not completed to redefine the targets already established in the approved ECHUS /HFSWS studies.
24	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	b. Frequency analysis not intended to be a comparison of unitary flows from different models, but rather a comparison of the return period flows generated by the LSS model with frequency flows at available monitoring stations.	The frequency analysis was used to generate return period flows from the study area based on continuous modelling. These return period flows were converted to unit flow rates in order to compare to other return period flows (per unit area) established based on calibrated models (HFSWS) as well as the design storm unit flows from the ECHUS study.
25	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	c. Section 5.3 – Discusses results of the erosion analysis, however no validation is completed for the duration analyses. From the graphics provided in Section 4.3, it is possible that the LSS baseline model over-predicts peak flows for the more frequent and less formative events (i.e. less than the 2 year or annual return period), thus over-estimating the existing erosion potential within the watercourses, and under-estimating requirements for erosion control. Further clarification is required in this regard.	Peak flows from the low and baseline scenarios were compared against monitored discharge from 2025 within the upstream Alloa Drain. Based on this review, the baseline scenario is considered more representative of existing conditions within Etobicoke Creek. Additional rationale is provided in Section 7, Appendix AA and is summarized in the LSS (Section 11.7.4).
26	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	d. Erosion assessment results indicate residual increases of between 6% and 33%, depending upon scenario. As such, the conclusion that “results from the erosion exceedance analysis indicate that the proposed development is not expected to negatively impact the pattern and rates of erosion within the Etobicoke Creek” is not supported by the information presented. Further clarification is required, and potentially revision to the erosion control strategy.	See response to Comment #14 above
27	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	e. Agree that the baseline scenario is appropriate for water balance assessment; suggest that further modelling be completed at subsequent stages, as the ranges of groundwater recharge are notably higher than those obtained from other studies applying integrated modelling for similar soils.	Acknowledged; note that the Sensitivity Analysis memo recommended the conservative, “low” flow scenario for the site wide / groundwater balance, which necessitates more recharge volume and BMPs, and the “high” runoff scenario for the wetland water balance analysis, which necessitates more surface water input to match pre-development monthly runoff volumes.
28	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	f. Use of baseline model for return period peak flows is considered acceptable; suggest that hydrologic modelling be used to demonstrate post-to-pre control at key locations, rather than relying on TRCA unitary flows, given the difference in unitary flows noted above.	The target flows established in the ECHUS study are more conservative than a post- to pre- comparison For example, the Regional flow target for the subject lands is 60% of the existing Regional flows, and the volume targets are based on control to these rates, plus and additional 214m3/ha. As the ECHUS study was prescriptive in defining targets for each catchment / node, these targets continue to be recommended for use. The downstream analyses included in Appendix C of the SSS (SSS can be found in Appendix K of the LSS) describe how the proposed control targets mitigate downstream flow increases.
29	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	g. Results of sensitivity analysis suggest that, in the absence of model calibration or validation to observed data, the low runoff scenario would be most appropriate for the erosion assessment and establishing SWM criteria.	Acknowledged.

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Additional Hydrogeology Comments Based Upon Review of New Information Included in Second Submission						
1	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>General comments on integrating regional and local hydrogeological datasets into the study:</p> <p>a. The report incorporates regional data/knowledge throughout the text (e.g. Peel SABC [2021]). Recommend clarifying the following to enhance the integration of local and regional data:</p> <ul style="list-style-type: none"> i. when highlighting regional data that are being used in an interpretation, explicitly citing the source. ii. providing justification when local data interpretations disagree with regional ones. <p>b. Examples:</p> <ul style="list-style-type: none"> i. the thickness of the Halton Till is often stated as 20m within the PSA (e.g. Page 264), with no source provided and no local data to validate (no boreholes drilled beyond 10m) ii. observed upward hydraulic gradients from local dataset, while stating that groundwater regionally move downwards through the Halton Till (Page 45).
2	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>General comments around groundwater recharge and discharge areas in all Phases:</p> <p>Phase 1 – Section 7: As per TOR Section 2.2.3, the groundwater recharge and discharge areas need to be refined. Recommend linking recharge and discharge areas (regional and local) and identifying specific key reaches where discharge occurs, acknowledging how the ESGRAs inform the conceptual model on areas within the PSA where groundwater serves a distinct ecological function.</p> <p>Phase 2 – Section 11.2: Should include a discussion on the changes to groundwater recharge, the likely impacts to groundwater flow and depth and this linkage to key discharge features discussed in Phase 1 (above). This includes specific recharge areas such as the ESGRA mapping discussed in Phase 1.</p> <p>Phase 3 – Sections 17.2 and 18.1: Recommend including a discussion on maintaining groundwater recharge – discharge linkages. Including the use of source control LIDs to maintain the spatial distribution of groundwater recharge.</p>
3	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>General Phase 1 Comment on Phase 1 Hydrogeology MW Location Maps (e.g. Figure 3/9/12)</p> <p>a. Well names in text and Appendix E don't match well names on well location figures (2023 monitoring well locations)</p> <p>b. There appears to be incorrect well names on locations (see "MWD" in the middle of PSA)</p>
4	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 32-33) – Geologic Cross-Sections: recommend including water level elevations on cross sections to help visualize the potentiometric surface</p>
5	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 34) – based on the results presented in Table 3 the geometric mean should be closer to ~1E-6 m/s instead 2.1E-5 m/s. Also, the K-test analysis datasets/reports should be included in the final submission.</p>
6	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>General Phase 1 Comment – in many sections it is stated that groundwater flow is typically downwards (e.g. Section 7.1.7 [Page 34] "Within the till soils, groundwater flow is typically downwards towards the more permeable, bedrock aquifer units"), however the results from the nested monitoring wells show upward vertical hydraulic gradients. Some contextualizing text should be included if the interpretations is that regionally there is downward groundwater flow through the Halton Till, however locally upward gradients are present.</p>
7	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 35) – in the last paragraph, recommendations are made to conduct Guelph Permeameter tests in the detailed design stage. Consider repeating this recommendation in Section 18.1.4 when discussing the feasibility of proposed infiltration-based LIDs.</p>
8	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 36) – Groundwater Level Fluctuations - a data gap has been filled by including monitoring data until spring 2025, the following comments relate to this new dataset:</p> <p>a. Recommend including a discussion on seasonal groundwater level fluctuations (i.e. ranges in groundwater levels across the dry and wet seasons) to complement the discussion on peak groundwater levels (Page 36). This would help in characterizing the local recharge and discharge areas. (Page 45).</p> <p>b. Recommend citing the well name and location in Appendix E when describing characteristics of specific groundwater hydrographs.</p> <p>c. Typically groundwater levels (Table 4 through 7, Appendix E) are provided in meters above sea level (m asl), this would facilitate the comparison of groundwater levels and the determination vertical hydraulic gradients at groundwater recharge and discharge areas (Page 45).</p> <p>d. Recommend a discussion of spatial patterns of vertical hydraulic gradients which could help provide context when characterizing the local recharge and discharge patterns in the PSA (Page 45).</p>

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9	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 40) – Groundwater Flow Direction – first and second paragraphs</p> <p>a. "both" seems to be incorrectly used / not necessary</p> <p>b. "flat hydraulic gradient", based on the groundwater flow maps, the hydraulic gradient is often on the order of 7 permil which is quite high, likely due to the low K tills. Consider removing reference to flat hydraulic gradient as the reason for minor groundwater flow.</p> <p>c. As no data has been collected to characterize interflow, please consider providing more context for the statement on interflow.</p> <p>d. Consider moving paragraph on regional groundwater flow before the discussion of local groundwater flow conditions.</p>	<p>a. Wording has been revised in first and second paragraph of Groundwater Flow Direction section (7.1.8.5).</p> <p>b. Addressed in report. Reference to flat hydraulic gradients were removed.</p> <p>c. Addressed in report. More context on interflow has been included in the second paragraph of the Groundwater Flow Direction (Section 7.1.8.5).</p> <p>d. Addressed. This paragraph has been relocated accordingly to before the discussion of the local GW flow conditions in Groundwater Flow Direction section (7.1.8.5).</p>
10	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 41) - Groundwater Flow Direction - the last paragraph in the groundwater flow direction discusses the hydrographs and their response (or lack there of) to precipitation events:</p> <p>a. Consider moving this text to the groundwater level fluctuations sections since it is referring to the hydrograph data</p> <p>b. After reviewing the newly acquired hydrograph data (see Comment 14 - New Hydrogeology Comments):</p> <p>i. At many locations residual barometric effects in the hydrographs make it difficult to discern a rain event response from a barometric pressure fluctuation. If these effects are unable to be removed, please consider qualifying the event-based response characterization with this source of uncertainty.</p> <p>ii. Please consider the wording around confining layer and response to precipitation: (1) many hydrographs show strong response to rainfall, (2) a high degree of confinement often leads to larger pressure response as specific storage is far smaller than specific yield.</p>	<p>Addressed within Section 7.1.8.5, see below:</p> <p>a. Text has been moved to groundwater level fluctuation section.</p> <p>b. i. Qualified as suggested.</p> <p>b. ii. Wording has been appropriately adjusted as suggested.</p>
11	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 42) – Groundwater Flow Direction – first/second paragraph and Figure 12:</p> <p>a. Text states that groundwater "typically flows from high to low potential" – should remove the word "typically".</p> <p>b. Recommend adding Alloa Drain, Wetlands, groundwater flow divides to Figure 12 as these features are referenced in the text when describing the figure.</p> <p>c. Incorporating results from groundwater level fluctuations/vertical gradients may further enhance the evidence of groundwater discharge to specific wetlands (e.g. Wetland 7)</p> <p>d. Recommend revising the schematic groundwater flow arrows, which do not align with the steepest horizontal hydraulic gradient.</p>	<p>Addressed within Section 7.1.8.5 and associated figures, see below.</p> <p>a. Addressed. Wording has been revised.</p> <p>b. Addressed. Features now included in Figure 12.</p> <p>c. Noted. Figure 15 has been included to show groundwater discharge and recharge locations.</p> <p>d. Addressed. Revised flow arrows included in Figure 12.</p>
12	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 7.1.7 (Page 45) – Discharge and Recharge:</p> <p>a. See Comment 5, 7b, 9b, 10c</p> <p>b. Recommend including discussion of spatial patterns of vertical hydraulic gradients which could strengthen the interpretation of the local recharge and discharge patterns in the PSA.</p> <p>c. Recommend revising wording: "It appears as though GW discharge is occurring" based on minor upward gradients</p>	<p>a. Refer to comment response matrix for Comments 5, 7b, 9b, and 10c above.</p> <p>b. Refer to comment response matrix for Comment 8d above.</p> <p>c. Addressed. Wording has been reworded in the Discharge and Recharge section in Section 7.1.8.11.</p>
13	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>If available, graphical borehole logs for 2024 drilled locations (similar to Appendix C) should be included rather than the drilling records.</p>	<p>Graphical borehole logs are not available as no geotechnical reporting was carried out for Phase 2 lands. Borehole logs must be used.</p>
14	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>A data gap has been filled by including monitoring data until spring 2025. The following comments related to the new monitoring data that is provided in the ISS:</p> <p>a. Barometric effects are still apparent in many GW hydrographs which make it difficult in making an precipitation event response characterization (which is done in multiple sections of 7.1.7.</p> <p>b. Typically groundwater hydrographs are plotted in meters above sea level to facilitate comparison between different locations and vertical gradients assessment at nested locations.</p> <p>c. No Staff Gauge Hydrographs are provided. Have these been collected and are missing? Or are these to be provided later? Context for this should be included in the text.</p> <p>d. For wetland monitoring locations, recommend plotting, staff gauge, mini-piezometers and nested MW data all on a single hydrograph (in masl)</p> <p>i. For Example - MW104 S/P24/SG1 at Wetland 7 having all this water level together on a single plot would be extremely beneficial when characterization groundwater – surface interaction.</p>	<p>Addressed within Section 7.1 and associated subheadings, see responses below:</p> <p>a. Noted. Data noise was not able to be rectified. Interpretation qualified.</p> <p>b. MASL has been included in Table 5, 7, 8 and 9 of Section 7.1.8.</p> <p>c. Not included. Context added to text in Section 7.1.</p> <p>d. Recommendation noted.</p>
15	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	<p>Section 11.2.2 and 11.2.3 (Page 181) – Groundwater Quantity and Quality:</p> <p>a. The SGRA mapping discussion is included in the Groundwater Quality section however it is more a groundwater quantity metric representing land areas where average annual recharge rate is 15% greater than the average annual recharge.</p> <p>b. ESGRAs are described in the existing conditions characterization section (7.1.7) however are not mentioned in the impact assessment. The introduction/objective (11.2) to the section describes maintaining groundwater function as one of the aspects of the impact assessment, a discussion of ESGRAs should be included to help accomplish that objective.</p> <p>c. Recommend incorporating SGRA, HVA, WHPAs and ESGRA mapping on some of the existing maps which would help clarify some of the descriptions provided in the text.</p>	<p>a. Noted. Significant groundwater recharge area discussion has been included in Section of 11.2 and associated subheadings.</p> <p>b. Discussion on ESGRAs has been included in Section 11.2.3 - Groundwater Recharge and Discharge.</p> <p>c. Relevant source protection features (i.e. SGRA, ESGRAs, HVAs) have been included on Figure 14 - Groundwater Features.</p>

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16	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 11.2.4 (Page 187) – Feature Based Water Balance with GWM Inputs: a. This section states that seepage amount is assumed to be consistent in the pre-and post-development stage as the “mapped wetland areas are not altered”. Since the groundwater discharge/seepage to wetlands is a function of groundwater flow towards the wetlands which is maintained by local groundwater recharge, could you please consider including qualifying text on how impacts to local groundwater recharge are not expected to change groundwater discharge towards wetlands?	Feature based water balance with GW inputs sections have been removed.
17	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	General comment on groundwater impacts to subgrade infrastructure: Section 11.2.5 (Climate Considerations) – second paragraph – “... the most significant impact would be to the functioning of stormwater management features designed to infiltrate as separation to the groundwater table could decrease, effectively causing a backup in infiltration through groundwater mounding. Likewise, infrastructure could interact with groundwater.”: a. Given the hydrogeologic conditions described in Section 7.1.7(low K tills, upward hydraulic gradients, etc.), a large portion of the PSA could be prone to groundwater mounding and/or shallow subsurface flooding, which may impact subgrade infrastructure. b. In Section 11.2, a discussion on the potential for these impacts across the PSA should be included (and the associated management strategies in 17.2.2 and 18.1.1).	a. Noted, additional commentary provided Section 7.1.8. b. Noted, additional commentary provided in Sections 11.2, 11.11, 17.2.2 and 18.1.1.
18	Montrose Environmental	30-Sep-25	N/A	N/A	Sept 30 2025	Section 17.2.2 (Page 249) – Groundwater Quantity: a. “Sandier materials are observed in the shallow subsurface and may allow for slow groundwater recharge.” – does this statement conflict with all the data that suggests upward hydraulic gradients and the shallow confining conditions?	Interpretation revised in Section 17.2.1 - Groundwater Quantity.
Town Natural Heritage Comments (Jason Elliott)							
1	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	As it was an incomplete submission and the landowner group indicated that the second submission was forthcoming, the first submission was not reviewed by Natural Heritage. Therefore, the comments provided below are result from the first time the submission materials were reviewed from a Natural Heritage lens.	No action.
2	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Wetland Water Balance: The wetland water balance risk assessment work is not understood and/or appears to contain errors. Clarify/revise the following and associated analysis as appropriate.	Note - the surface water balance completed by Urbantech focuses on surface water inputs to the wetland features, whereas the Crozier analysis was completed to identify if groundwater interaction played a significant role in the monthly contributions to the wetland.
3	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Wetland areas reported in Appendix Y are incorrect. Confirm that this did not affect catchment delineation.	Updated. Areas have been confirmed to be consistent with other measurements.
4	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Dwg 3G indicates a 5% change in catchment area to W1 but Table 48 assigns a Medium risk for that category. Further, while the areas draining to the wetland post-development are not clear, it appears that the majority of the change is in the Secondary Plan Area, not Highway 413 as indicated.	Drawing 3G has been updated to be consistent with Table 11 and 53 regarding the change in catchment area to W1.
5	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Dwg 3G indicates that portions of Woodland F that do not drain to the W4 pre-development will drain to it post-development. Similarly, Dwg 3G indicates that portions of Woodland G that drain to W5 pre-development will not drain to it post-development and vice versa. Clarify considering the woodlands are protected from development and site alteration.	As shown on Drawing 28, the proposed grading along the north and east boundaries of Woodland F will contain the flow such that the woodlot drainage is conveyed to Wetland 4. Similarly for Wetland 5, the proposed grading along the south and west boundaries of Woodland G will contain the flow such that the woodlot drainage is conveyed to Wetland 5.
6	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is understood that high density residential is being contemplated in the Special Study Area (apartment buildings). Clarify if/how the low dewatering risk for W6 took this into account considering Table 47 indicates that high density dewatering requirements are assumed to be higher.	Dewatering risk was considered based on the potential for overburden materials to transmit large quantities of water. Further, dewatering risks are limited when the duration is less than 6 months and no current development plans will incur long duration dewatering resulting in higher risk status.
7	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	The percent impact to recharge areas are indicated as low for all wetlands. Confirm that the Ecologically Significant Groundwater Recharge Areas (ESGRAs) described in Section 7 were factored into this as per the guidelines. See associated comment below. Provide mapping of the ESGRAs.	Mapping for ESGRAs can be seen on Figure 14 . ESGRAs should not be factored into this rating based on TRCA guidelines.
8	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Table 48 includes a note indicating that no survey was conducted so a high-risk rating was assumed but it isn't clear what this is referring to.	A wetland flora survey has been completed by Cunningham Environmental Associates and incorporated in the analysis of the risk evaluation and into Table 53 . The high-risk rating was adjusted based on survey results and revisions.
9	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that the medium risk associated with dewatering is only temporary construction dewatering and hence it is dismissed. This does not follow the guidelines. Further, if construction dewatering is needed, clarify how permanent dewatering won't be. For clarity, if basements are proposed within the water table, how will it be ensured that typical practices such as sump pumps, foundation drains, weeping tiles etc. to manage groundwater won't be implemented.	Section 11.3 and associated subheadings: Temporary construction dewatering will be necessary for the installation of deep servicing. Residential units will not be set within the water table, therefore permanent dewatering will not be required. The water taking risk in Table 53 has been revised to “low” based on available groundwater data and expected excavation depths, extents, and durations (<6 months). Calculations will need to be further refined through detailed designs of the Draft Plans.

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10	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>It is indicated that because of the dismissal of the medium and high hydrologic change risk factors, all are considered low and therefore no mitigation is triggered. This does not follow the guidelines that a water balance for all protected wetlands that informs a mitigation plan to maintain water balance is required.</p> <p>Further, Dwg 3G displays areas where mitigation is proposed (SWM/LID discharge to wetlands, clean post-development drainage to wetlands). These have been included in the post-development wetland catchments without consideration of pre to post volumetric changes that the monthly water balance must assess.</p> <p>Finally, clarify how this relates to the feature-based water balance assessments (surface and groundwater) outlined in Sections 7 and 11.2.4. The results of the risk assessment must be clear and conform to the guidelines. Further, demonstration that the correct resultant monitoring and analysis is required.</p>	<p>The post-development hydrologic model, including the wetland water balance assessment was based on the drainage plan in Drawing 3G and was therefore considered in the pre- to post- volumetric analysis.</p> <p>Catchment areas within Drawing 3G and Table 11 and 53 have been revised and are now consistent.</p>
11	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Notwithstanding the previous comment, it appears that wetland water balance monitoring and analysis has been undertaken. However, it is not clear if it conforms with the risk assessment guidelines. Further, the integration between groundwater and surface water is not understood. Address the following:</p>	<p>Noted. Comments 12-14 addressed below.</p>
12	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 7.2 indicates a preliminary wetland water balance to quantify groundwater interaction and a separate water balance for surface water was undertaken with those details outlined in the Scoped Servicing Study (SSS). The details of the surface water balance must be included in the LSS.</p>	<p>Groundwater input water balance removed.</p> <p>The wetland water balance analysis is included in the LSS (Section 17.3 and Appendix K - Scoped Servicing Study)</p>
13	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>As sufficient data has not yet been collected to calibrate the wetland water balance model, a sensitivity analysis was presented. That analysis recommended that the low flow scenario be used to establish infiltration targets because there is no perceived risk of "extra" infiltrative LIDs. Similarly, it recommended using the high flow scenario for establishing wetland water balance targets (clarify that this is referring to surface water targets) because there is no perceived risk of sending "extra" runoff volumes to the wetlands as they would "simply overflow". Neither of these statements are necessarily accurate and must be demonstrated. Further, it is not clear which scenarios were actually used. Clarify and/or revise accordingly.</p>	<p>The location of suitable LID BMP measures is shown on Drawing 3E (included in the Scoped Servicing Study in Appendix K of the LSS) and is based on the proposed grading and groundwater information provided by Crozier. With respect to the target recharge volumes, the targets were based on the most conservative sensitivity analysis scenario (Low Runoff, which implies the most required recharge). This approach ensures that sufficient consideration is provided for LID sizing at this early stage. The LID designs will be refined as the continuous model is updated / calibrated when sufficient data becomes available.</p> <p>The purpose of the surface water feature-based water balance completed for all of the subject wetlands as part of the LSS was to confirm that sufficient runoff is provided to each wetland such that pre-development runoff conditions are met as a minimum. Through future design stages/studies, further detailed analysis will be completed for the surface water FBWB to evaluate the ponding depths in each wetland with respect to ecological requirements. As part of this detailed FBWB during future studies, it will be confirmed that the ponding depth in each wetland is sufficient for ecological function, where, if required, any excess of runoff under post-development conditions will be mitigated through a refinement of the wetland catchment areas to provide an appropriate spill from the wetland(s) to the downstream features while maintaining a suitable ponding depth. Additional context on the implementation of control devices to address the high flow scenario has been included in the report.</p>
14	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>The SSS indicates that summary of the surface wetland water balance results are contained within Appendix C of that report. However, the summary could not be found. The report text indicates that the results indicated that runoff volume to the wetlands is maintained post-development for all three sensitivity analysis scenarios. It is assumed this would be demonstrated in the summary and must be provided for review. Further, how this relates to the sensitivity analysis recommendation to use the high flow scenario must be clarified.</p>	<p>Appendix K of the LSS includes the Scoped Servicing study, which addresses the feature based water balance in the sensitivity analysis memo (Appendix C of the SSS). The graphs and tables for the wetland water balance are included in the sensitivity analysis memo.</p>
15	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>The wetland water balance in Section 11.2.4 is not understood and/or appears inconsistent with the wetland water balance risk assessment. Address the following:</p>	<p>Noted. See Comments 16-22 below for responses.</p>
16	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Confirm that Inflow and Outflow refer to runoff into and out of wetlands, seepage refers to infiltration and Change in Storage refers to surface ponding in the wetland or clarify as appropriate.</p>	<p>Comment is not applicable. Wetland water balance with groundwater inputs has been removed.</p>

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17	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Previous sections indicated that surface and groundwater water balances were conducted separately. However, as the tables appear to include both infiltration and runoff, confirm that the modelling in this section included both and clarify how it relates to the SSS water balance. Further, clarify which of the modelling scenarios from the sensitivity analysis were used.	<p>To clarify, feature-based water balance for the wetlands and a site-wide water balance was completed using continuous modelling as described in the Scoped Servicing study (Appendix K of the LSS). The hydrologic model (Visual OTTHYMO) included infiltration. The site-wide water balance reported annual runoff and recharge volumes, whereas the feature based wetland water balance analysis reported monthly runoff volumes only.</p> <p>The preliminary results of the groundwater interaction component of the feature-based water balance, as suggested in the TOR, was not appropriate at the sensitivity analysis level of investigation and as such will be addressed at the EIR/FSR stage when appropriately calibrated data can be incorporated. It should be noted that the continuous modelling for the wetland feature-based water balance analysis will continue to be updated through the Draft Plan and detailed design process, as well as the eventual model calibration.</p>
18	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that W1 has a 22% reduction in drainage area but Dwg 3G indicates a 5% reduction. Similarly, it is indicated that the reduction is entirely due to Highway 413 but Dwg 3G displays substantial changes in the drainage area within the Secondary Plan area (although the exact changes are unclear as indicated above). It is indicated that W5 has a 1% decrease in drainage area but Dwg 3G indicates a 0% change. It is indicated that W6 has a 39% increase in drainage area but Dwg 3G indicates a 46% increase.	<p>Drawing 3G has been updated to be consistent with Tables 11 and 53 regarding the change in catchment areas to W1 and W6.</p> <p>Tables 11 and 53 have been updated to be consistent with Wetland Water Balance Appendix Information (Appendix Z).</p>
19	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that W3 - W6 have an increase or a significant increase in impervious drainage area but they were assigned a Low impervious cover score in the risk assessment (Table 48).	For W3-W6, the calculated low impervious cover score is correct per the TRCA guidelines. Percentages have been provided in the body of the document.
20	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that mitigation will be explored for all wetlands. In addition to contrasting with the statements associated with the wetland water balance risk assessment as outlined above, as acknowledged in the response to comments on the first submission of the LSS ToR, the LSS must demonstrate that mitigation is feasible. It is indicated that inflow surplus mitigation could include increased infiltration to reduce inflow. As the wetlands are supported by groundwater, this may not be acceptable as it could affect wetland hydrology.	<p>Given that the wetlands are primarily surface water driven with minor groundwater inputs, the focus for wetland mitigation will be driven by the feature-based water balance. As long as pre- to post-development infiltration is met on a catchment basis, groundwater dynamics shall be sufficiently maintained as discharge is controlled on a more regional scale. Wetland water balance modelling will be refined through future model calibration and functional / detailed design in coordination with the ecological consultant to ensure no negative impacts related to increases or decreases in runoff volumes.</p> <p>The purpose of the surface water feature-based water balance completed for all of the subject wetlands as part of the LSS was to confirm that sufficient runoff is provided to each wetland such that pre-development runoff conditions are met as a minimum. Through future design stages/studies, further detailed analysis will be completed for the surface water FBWB to evaluate the ponding depths in each wetland with respect to ecological requirements. As part of this detailed FBWB during future studies, it will be confirmed that the ponding depth in each wetland is sufficient for ecological function, where, if required, any excess of runoff under post-development conditions will be mitigated through a refinement of the wetland catchment areas to provide an appropriate spill from the wetland(s) to the downstream features while maintaining a suitable ponding depth.</p>
21	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that the seepage results remain consistent pre to post because the mapped wetland areas have not been altered. This suggests that only seepage within the wetlands were modelled and that infiltration throughout the wetland's groundwater catchment was not assessed. As the wetlands are supported by groundwater and development can impact infiltration, clarify and/or revise as appropriate.	<p>Infiltration across the broader groundwater catchment that contributes recharge to the wetlands was included within the model through the application of spatially distributed recharge. Areas subject to land-use change were assigned revised recharge rates in the post-development scenario to reflect potential changes in infiltration (e.g., increased imperviousness, grading, stormwater controls).</p> <p>It should be noted that the continuous modelling for the wetland feature-based water balance analysis will continue to be updated through the Draft Plan and detailed design process, as well as the eventual model calibration including GW inputs.</p>
22	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated further modelling is required for the wetland water balance to address the increases/decreases in runoff. Clarify what further modelling is needed and why this contrasts with the SSS that indicates that runoff volume to the wetlands is maintained post-development (see above). Further, it is indicated that W2-5 have an increase in runoff. Clarify if this includes the SWM/UD discharge to wetlands or clean post-development drainage to wetlands displayed on Dwg 3G. It is not understood if/why mitigation is proposed without supporting modelling and has been factored into the wetland water balance risk evaluation. However, it is noted that Section 11.3 indicates that modelling with SWM facilities in place was used in the feature-based water balance.	As per the Sensitivity Analysis Memo in Appendix C of the Scoped Servicing Study (provided in Appendix K of the LSS), there is an increase in runoff for Wetlands 1-6 under post-development conditions. It should be noted that the continuous modelling for the wetland feature-based water balance analysis will continue to be updated through the Draft Plan and detailed design process, as well as the eventual model calibration.

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23	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 18 recommends that rooftop drainage collectors be used to support wetland water balance as required. Clarify how this relates to the SSS that indicates that no mitigation is necessary.	Reference the rooftop drainage collectors has been removed from the LSS.
24	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	A clear discussion on what modelling was undertaken, how it/they conform to the risk assessment requirements, and how it/they relates to the site water balance that is proposing substantial over-infiltration must be provided. Additionally, a clear summary of the modelling results pre and post-development and the establishment of preliminary targets is required. Finally, the feasibility of implementing any associated mitigation to meet the targets is required. Discussion with staff on this item is recommended prior to a resubmission.	A discussion of the Feature-Based Water Balance modelling is provided in Section 3.6.3 of the Scoped Servicing Study (provided in Appendix K of the LSS). The FBWB results are summarized and discussed in further detail as part of the Sensitivity Analysis Memo included in Appendix C of the Scoped Servicing Study (provided in Appendix K of the LSS).
25	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Site Water Balance: It is indicated that the low runoff scenario from the sensitivity analysis was used to calculate the infiltration target for the lands in TRCA's jurisdiction as it is the most conservative. It is also indicated that the proposed mitigation substantially exceeds the target. As all of the wetlands are supported by groundwater, it must be demonstrated that this will not alter wetland hydrology.	The purpose of the surface water feature-based water balance completed for all of the subject wetlands as part of the LSS was to confirm that sufficient runoff is provided to each wetland such that pre-development runoff conditions are met as a minimum. Through future design stages/studies, further detailed analysis will be completed for the surface water FBWB to evaluate the ponding depths in each wetland with respect to ecological requirements. As part of this detailed FBWB during future studies, it will be confirmed that the ponding depth in each wetland is sufficient for ecological function, where, if required, any excess of runoff under post-development conditions will be mitigated through a refinement of the wetland catchment areas to provide an appropriate spill from the wetland(s) to the downstream features while maintaining a suitable ponding depth.
26	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Headwater Drainage Features: It is indicated that the headwater drainage feature assessment generally followed the CVC/TRCA guidelines. Many deviations from the guidelines are proposed; sometimes inconsistently. While some of these are supported, address the following.	Acknowledged.
27	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD1-2A: the proposed downgraded management recommendation of Mitigation from Conservation in the upstream portion due to it being within the footprint of Highway 413 is not supported. It is acceptable to indicate that the assessment of the feature is to be updated once the details of the highway are finalized.	Preliminary design plans in Appendix B of the Highway 413 Preliminary Design and Assessment of Environmental Impacts Draft Environmental Impact Assessment Report (AECOM and WSP, December 2025) were reviewed to understand proposed highway infrastructure in vicinity of Reach AD1-2A. A bridge is currently proposed in this location and the final HDF management classification has been revised to Conservation. Refer to Section 7.5.3 of the LSS and Appendix N.
28	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD1-2B: It is proposed to downgrade the management recommendation from Protection to Conservation. While this is generally supported, clarify how it relates to the recommendation in Section 18 to remove the pond.	It is assumed this comment references AD1-2D rather than AD1-2B. Should the downstream portion of Reach AD1-3 and/or the upstream portion of AD-12 be proposed for realignment in the future, the length of Reach AD1-2D could be replicated in the design. Section 18.2.4.5 has been updated accordingly.
29	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD1-3: standing water in a multi-thread feature during all three visits results in a Protection classification. Downgrading the classification due to the potential effects of Highway 413 is not supported. It is acceptable to indicate that the assessment of the feature is to be updated once the details of the highway are finalized.	Preliminary design plans in Appendix B of the Highway 413 Preliminary Design and Assessment of Environmental Impacts Draft Environmental Impact Assessment Report (AECOM and WSP, December 2025) were reviewed to understand proposed highway infrastructure in vicinity of Reach AD1-3. A structural culvert is currently proposed in this location and the final HDF management classification has been revised to Conservation. Refer to Sections 7.5.3 and 7.5.4 of the LSS and Appendix N.
30	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD1-4: The classifications assigned result in a Protection management recommendation through the guidelines, not Conservation as indicated. Downgrading because it may get removed due to Highway 413 is not supported. It is acceptable to indicate that the assessment of the feature is to be updated once the details of the highway are finalized.	This reach is located outside of the Alloa Secondary Plan Area and is subject to review as part of the Highway 413 design. The management classification has therefore been removed from the all mapping and reporting.
31	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD3-2: The mapping in Appendix K displays the feature originating in a woodland, which appears consistent with aerial imagery, but the assessment on Pg.11 indicates that an agricultural field is upstream of the feature. If originating in the woodland, the guidelines result in a Conservation management recommendation. If it does not originate in the woodland, see the next comment regarding the proposed No Management recommendation.	The HDF reach sheet in Appendix B of Appendix N has been revised to note the woodlot at the upstream extent of the drainage feature. Minimal flow was present during the first HDF field visit and it was dry thereafter. No wetlands are present in the woodlot at the upstream extent of this feature (but are located at the northern tip of the woodlot adjacent to the Alloa Drain). The HDF traverses an agricultural field with no natural riparian vegetation, is cultivated during the growing season, and was dry during the second site visit. The proposed Alloa Drain realignment is directly adjacent to the northern limit of the woodlot and will provide for a contiguous NHS.

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32	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD3-1, AD3-3 to AD3-8, AD4-2, AD5-5, AD5-5A, AD6-1, AD6-2, AD6-2A, FC-2D, FC-2D-1, FC-3A, FC-3B, FC-3C, FC-4A, FC-4B, FC-4C: the presence of flowing water in the first visit results in a Mitigation management recommendation. The proposed downgrades to No Management are not supported.	The hydrology of each reach was further refined in Appendix B of Appendix N using language in the guideline for flow condition. Item F on page 23 of the TRCA and CVC (2014) guideline notes that features that have no or minimal flow, cropped land or no riparian vegetation, no fish or fish habitat and no amphibian habitat can be assigned a No Management classification. The Alloa Drain corridor is proposed for realignment and will be in a different configuration than currently exists. Swale features are provided in the conceptual design for the realigned corridor that will mimic the form and function of these reaches. The locations and configurations of swales within the floodplain can be further refined as Tertiary Plans progress.
33	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD4-1: wetland feature with standing water in third visit results in Protection management recommendation. Downgrade to Conservation proposed due to altered nature of the feature. Revise to include details on what alterations have occurred and additional information on how a net benefit would result from relocation into the constructed Alloa Drain corridor for review.	Ad hoc erosion control measures, including small retaining walls and PVC pipe have been installed to manage and convey local drainage, which has led to degraded conditions along the reach. Photos illustrating existing conditions have been added to Appendix B of Appendix N . Additional text has been added to Sections 7.5.3, 7.5.4 and 11.6 of the LSS and Appendix N .
34	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	LD4-3C: In contrast to the HDFA which suggests a drainage divide between LD4-3E and AD4-3, Dwg 3A indicates that a portion of LD4-3C and LD4-3D, LD4-3E and AD4-3 are part of a 42.8ha catchment that flows south into the Alloa Drain. The following must be addressed. Discussion with the TAC is recommended.	Field observations confirmed that there is a drainage divide on non-participating lands (i.e. Reach LD4-3E) as Reach LD4-3D was observed flowing south to north and Reach AD4-3 was flowing north to south. During high return period events it is assumed that the drainage divide is overcome and water flows north to south.
35	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	LD4-3D and LD4-3E: as per the guidelines, management recommendations of downstream reaches cannot be 'lower' than upstream reaches. Therefore, as they are downstream of a Protected HDF, the guidelines result in a Protection management recommendation.	Refer to the response to Comment 35, above.
36	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	AD4-3: flowing water in first visit results in Mitigation management recommendation. While it is acknowledged that flows were only observed along 1/3 of its length, as per the guidelines, it is likely that the entire feature would flow if the tile drain was removed. Further, as indicated above, given the HDFs upstream, the guidelines result in a Protection management recommendation. A linkage with floodplain storage is proposed in this location that is proposed to focus on infiltration. The opportunity to provide a drainage feature supplied by clean water should be explored.	Refer to the responses to Comments 32 and 35, above. Section 7.5.7 of Appendix N notes the proposed linkage will provide a corridor for wildlife connecting the northern woodlot to the Alloa Drain. The bioswale is expected to have intermittent flow and a meandering planform. The linkage creates a dedicated, continuous corridor that will provide short-term water retention, infiltration and sediment banking. The HDF management classification for this reach has not been revised; however, the proposed linkage with a dry swale is consistent with measures provided for Mitigation HDFs in the TRCA and CVC (2014) guideline. Water will be provided to the feature during the spring freshet and as a result of surface run-off and will convey water during the Regional event.
37	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	LD5/LD6: The reach break is not understood. It appears on aerial imagery that the tile drain begins at the upstream end of LD6. Therefore, it is not clear why the tile drain was evaluated as LD5 but a surface feature was evaluated as LD6. Further, as per the guidelines, the suspected impacts of the tile drain modifier and changes expected to occur when the modifier is removed should be assessed. It appears on historic aerial imagery that the tile drain was constructed circa 2011 and the previous open channel was removed circa 2012. The previous open channel should be evaluated in determining appropriate management. It is noted that a channel corridor is proposed in this area on Figure 22. Given the nature of the subject HDFs, this management recommendation is supported.	It is assumed this comment references AD1-2D rather than AD1-2B. Should the downstream portion of Reach AD1-3 and/or the upstream portion of AD-12 be proposed for realignment in the future, the length of Reach AD1-2D could be replicated in the design. Section 18.2.4.5 has been updated accordingly.
38	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	FD1-1: The mapping displays the feature within a woodland. Inspection of aerial imagery reveals that a portion of the woodland was removed in 2023/2024. The photographs provided in the assessment display many tree stumps. If removed without approvals, the assessment must consider the feature to be flowing through woodland. As per existing OP Policy 5.7.3.3.1.6 and Future Caledon OP Policy 13.12.7, EPA lands/Natural Features and Areas are not to be damaged or destroyed without approval and if they are, there shall be no boundary adjustment and rehabilitation is required. If the woodland removals were approved, the proposed downgrade from a Mitigation to a No Management recommendation is not supported. It is noted that this area is proposed to be within the NHS on Figure 22 which is supported. Include recommendations regarding how it is to be rehabilitated in the LSS.	Addressed: Upon review with the Project Botanist, the woodland removal area being referred to here was a selective removal completed by the non-participating landowner to remove dead Ash trees. As this area was not entirely removed and is more a matter of regeneration post selective removals, this particular woodland will be subject to a woodlot management plan when these particular lands become subject of future development applications. The HDF through this woodland area will be considered a protected reach. Text has been revised in Section 10.4.1.
39	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	FD2-1: The presence of forest near the right bank means the riparian classification is Important which results in a Conservation management recommendation.	This feature and the adjacent Woodlot are within the future Highway 413 footprint, immediately west of the Secondary Plan Area boundary. The management of this feature is the responsibility of the MTO and as such, it has been removed from the mapping and reporting.
40	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	FD3: As per the guidelines, the suspected impacts of the tile drain modifier and changes expected to occur when the modifier is removed should be assessed. It appears on historic aerial imagery that the tile drain was constructed circa 2015 and the previous open channel was plowed through since then. The previous open channel should be evaluated in determining appropriate management.	This reach is located outside of the Alloa Secondary Plan Area and it is assumed that its management will be considered by the MTO as part of the design and construction of Highway 413. It has therefore been removed from the mapping and reporting.

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41	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	FC-2A: The suite of classifications given to the feature result in a Protected management recommendation per the guidelines, not Conservation as indicated. It is proposed to downgrade its Protection recommendation and the Conservation recommendation for FC-2B to Conservation and Mitigation, respectively. The provided rationale for the downgrades is not supported as the factors outlined are addressed through the guidelines. Nevertheless, realignment/relocation of the features may be supported in this case provided a net benefit is proposed. Revise to indicate how a net benefit will be realized including discussion on all relevant functional attributes such as channel length, flow and allochthonous contributions, sediment transport, habitat including direct fish habitat, etc. It must also be demonstrated that the hydrology of the realigned/relocated features and the associated wetland can be supported by the proposal. This comment also applies to Section 10.5.3 - the demonstration of net benefit must include FC-2A and FC-2B. Figure 22 does not propose any NHS in this area. This is not supported.	<p>Figure 22B denotes the wetland replication at 1850 Mayfield Road per an agreement reached with the CVC.</p> <p>The preliminary management classification has been revised to Protection and is reflected in Appendix N. Additional text has been added to Sections 10.5.4 and 11.6 and Appendix M to document the net benefit based on the management of this drainage feature.</p> <p>The proposed design provides an opportunity to restore and enhance the existing feature by providing habitat diversity, topographical variability, terrestrial and semi-aquatic habitat for a variety of species, while maintaining a similar hydrology to downstream features. The existing HDF and wetland have been heavily impacted by agricultural practices and provide a homogenous habitat that provides limited benefit.</p> <p>Our design aims to maintain the natural character of the HDF and wetland while providing improved habitat conditions to allow for a range of conditions. The design maintains channel length by providing a sinuous channel that will have good communication with the floodplain to maintain wetland habitat. Additional text has been added to Section 7.5.5 of Appendix M.</p>
42	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	It is indicated that Appendix K contains detailed reach descriptions, photos and field assessment sheets for the municipal drains. However, that information is contained within Appendix M. Revise for clarity.	Addressed. Appendix information has been updated.
44	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	As they must be field verified when access is available, the HDFs on non-participating lands were generally not reviewed. The LSS must clearly indicate that they must be studied when access becomes available.	Noted. Appendix N and Section 7.5.2 include this requirement.
45	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.5.4 outlines as partial list of HDF management requirements. It should be acknowledged that there are more listed in the guidelines.	Noted. Section 7.5.4 and Appendix N have been updated accordingly.
46	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Ensure that it is demonstrated that the revised management recommendations after addressing the comments above are being provided.	Noted. The management recommendations have been revised in Section 7.5.4, Appendix N and applicable mapping, as appropriate.
47	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<u>Road crossings of NHS:</u> It is indicated that the road crossings of the NHS are essential to ensure the viability of transit and active transportation. It is also indicated that more information can be found in Section 6.1.1 of the Transportation Needs Assessment, but it contains the exact same information as the LSS. The information in these documents is similar to the information provided separately in the Crossings Justification Letter (Crozier, January 31, 2025) which provides additional discussion. That information focuses on the two proposed woodland crossings in the Phase 1 area. Based on that information, it is agreed that the northern crossing of Woodlands F/G is essential to support transit goals. However, it is not agreed that the information demonstrates that the southern crossing through Woodland I is essential as the argument it relies on, that an alternate alignment that avoids the woodland is not possible given the proximity of Street A to the south, is flawed. Town spacing requirements for collector roads is between 250 to 400m. As there is over 700m between Mayfield Road and Woodland I, two collector roads in that area are possible with only a slight bend of Street A to the south. Further, active transportation through the woodland without a road is possible.	Addressed: Sections 10.2 and 11.12 have been revised to reference the Preliminary Preferred Alternative for the Alloa Phase 1 Preliminary Collector Road Network as presented at the Public Information Centre for the Caledon Multimodal Transportation Masterplan Addendum Study (September 30, 2025).
48	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Additionally, the LSS and the Crossings Justification Letter indicate that the proposed NHS crossings were located in areas that minimized impacts without any supporting rationale. While the Transportation Needs Assessment included an evaluation of alternative solutions, the only natural environment criteria included were air quality and noise impacts. Nothing was provided on natural heritage impacts.	Addressed: Sections 10.2 and 11.12 have been revised to recognize the current status of the MMTMP EA given that proposed crossings have not been located in areas that minimize impact.
49	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Notwithstanding the preceding, Future Caledon policy 13.3.3 only permits essential infrastructure within Natural Features and Areas that have been exempted, pre-approved or authorized under an environmental assessment (EA) process. The Town is currently completing a Multi-Modal Transportation Master Plan Addendum that will identify a preferred collector road network through the Secondary Plan area. As that study will fulfill the EA requirements, the LSS must use the collector road alignments approved through that study. Revise accordingly.	Addressed: Sections 10.2 and 11.12 have been revised to reference the Preliminary Preferred Alternative for the Alloa Phase 1 Preliminary Collector Road Network as presented at the Public Information Centre for the Caledon Multimodal Transportation Masterplan Addendum Study (September 30, 2025).
50	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<u>Local Subwatershed Study Comments by Section:</u> Executive Summary: As it appears that they have been completed, clarify why it is indicated that some field work and inventories are on-going and that the additional data will only reinforce the conclusions made in the report. Ensure the executive summary is updated when revising all other comments.	Addressed: The Executive Summary has been updated

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51	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 2.0: While it is displayed on Figure 1, the study area discussion omits that a significant portion of it is within the Fletchers Creek Subwatershed. This portion is larger than the portion of the study area that is within the Huttonville Creek Subwatershed which is discussed and should be added.	Addressed. Additional text has been provided in Section 2.0.
52	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 3.0: As the Alloa Secondary Plan is approved, add discussion on Secondary Plan policies that are relevant to and/or provide direction for the LSS and its outcomes.	Discussion added to Section 3.0 per comment, detailing relevant Secondary Plan policy direction for the Subwatershed Study process and for the implementation of future study.
53	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 5.0: The LSS ToR is referenced. It should be appended to the study.	The LSS ToR has been appended to the LSS. See Appendix A .
54	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 5.0:Consistent with the approved LSS ToR, add that the LSS implements the direction, targets, criteria and guidance of the SABE Scoped Subwatershed Study including confirmation/refinement of the preliminary NHS identified in that study.	Addressed. Additional verbiage has been added to Section 5.0.
55	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 5.0:Clarify why a subsequent impact assessment as part of finalizing the LSS is mentioned given the Phase 2 impact assessment was included in the study or revise accordingly.	There is reference to only one impact assessment in Section 5.0
56	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 6.0: It is indicated that the receipt of TRCA background NAI data is pending but that data appears to have been included in Table 1. Clarify and revise appropriately.	Data pending indicator carried forward in error and has been removed. Data from the TRCA was reviewed and incorporated into previous LSS submission.
57	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 6.0:Clarify why Table 1 indicates that the Phase 1 lands river system is Etobicoke Creek when a portion includes tributaries of Fletchers Creek, a tributary of the Credit River (Figure 4, Appendix O) and/or revise accordingly.	Table 1 has been updated to clarify Phase 1 lands are partly within Credit River watershed.
58	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.1.4: Clarify how the interpreted groundwater contours were determined considering the indication that the groundwater levels presented in Tables 4 - 7 are to be interpreted as potentiometric surfaces, not levels.	Addressed in report. GW Contours were interpreted on a well by well basis considering the seasonally monitored groundwater levels, stratigraphy and depth at which water strike occurred during drilling. Please see Section 7.1.8.5 - Groundwater Flow Direction for details.
59	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.1.4: The discussion on mapped Ecologically Significant Recharge Areas (ESGRAs) appears to misunderstand the function of ESGRAs in indicating that, while they occur where the study modelling also suggests recharge is occurring, the amount is not anticipated to be significant. The mapping indicates that recharge is occurring in those areas that provides a significant contribution to ecological features. The absolute amount of recharge is immaterial. Revise accordingly and consider in the impact assessment and proposed management strategy.	Wording has been revised in Phase 1 - Section 7.1.8 - Ecologically Significant Groundwater Recharge Areas (ESGRA). ESGRAs have been considered in Phase 2 - Section 11.2.3 and Phase 3 - Section 17.2.3.
60	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.1.4: Pg. 45 alternately indicates that standing water was observed in W1, 3, 4, and 6 during the spring and that W1-6 had spring inundation. Clarify and/or revise accordingly.	Standing water was observed in Wetlands 1, 3, 4 and 6 during early spring freshet (April to early May), but no at depths to support amphibian breeding habitats, and there was no standing water later in May and throughout the summer months and into the fall months
61	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.1.4: Table 9 indicates that the boundaries of W6 and W7 were updated in 2024 by the consultant team. Despite other sections indicating that the boundaries of the wetlands were submitted to MNR (e.g., Section 7.9), they do not review wetland delineations. That is the responsibility of Conservation Authorities. Confirmation of TRCA support for these changes must be provided.	Section 7.2 Wetland Water Balance contains Table 12 and the boundaries of W6 and W7 were updated in 2024 by CEA and are presented on the revised wetland mapping (Figure 2B, Appendix 5 of the LSS - June 2025) produced by Azimuth in the 3rd Submission LSS (January 2026). Azimuth undertook a point-in-time wetland re-evaluation for Wetland 7, as permitted and outlined in the MNR OWES Southern Manual 4th Edition December 22, 2022.
62	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.2:W4, W5 and W7 are classified as Swamp Maple Deciduous Swamps. However, the dominant species listed in Table 10 are not consistent with that classification. Clarify and/or revise accordingly.	Section 7.2.2 Wetland Water Balance - Wetland Community ELC for Wetland W4 has been revised from SWDM3-3 to SWDM2-2. Wetland Community ELC for Wetland W5 has been revised from SWDM3-3 to SWDM2-2 and Wetland Community ELC for W7 has been revised from SWDM3-3/MAMM1-3 to SWDM2-2/MAMM1-3 on Table 11: General Wetland Information. Table 33: List of Vegetation Communities (ELC) Delineated and Characterized in the Primary Study Area will be revised to reflect the ELC labels from SWDM3-3 to SWDM2-2 for Wetlands 4, 5 and 7
63	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.2:The discussion on wetland sensitivity is relevant to the wetland water balance risk evaluation presented in a different section but is only partially reported and differs from Table 48. Revise to include with the risk assessment and consistently report on all aspects.	Section 7.2 has been revised to provide consistency throughout LSS.
64	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.2:Wetlands in the study area are classified as Locally Significant and not Provincially Significant. It is not clear what is meant by these terms. Revise to only use terminology from the Town's OPs.	Addressed: Text updated throughout the report to use only "non-provincially significant" to be consistent with Town's OP.
65	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.2:It is indicated that the preliminary post-development drainage areas were used in the wetland water balance. A requirement that it be updated with the finalized post-development drainage areas at subsequent stages must be provided in the report.	The wetland water balance analysis in the Scoped Servicing Study (Appendix K of the LSS) completed both pre- and post-development modelling and it will continue to be updated through the subsequent stages of the design and approval process.
66	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.7: It is indicated that the pond upstream of monitoring station ASWS receives flows from HDFs. However, Appendix K indicates that the pond outlets to HDF AD1-2D. Clarify and/or revise as appropriate.	Section 7.7 has been revised to note that station ASWS is located along a northern tributary of the Alloa drain that received flows from watercourse and HDF reaches. Section 4.6 of Appendix N has also been updated.

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67	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.8: The fish habitat assessment indicates that Tributary #4 is considered indirect fish habitat. As the HDFA observed fish in the feature, revise to indicate that it is direct fish habitat.	Section 7.8.5 and Table 30 revised to state the Tributary #4 is seasonally direct fish habitat.
68	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.8: Clarify if the pond discussed in relation to Tributary #7 is the feature located on the Alloa school property. It is indicated that it is assumed the feature is offline to the tributary. However, what appears to be a headwall and a flow path between the feature and the tributary is evident on aerial imagery. Revise accordingly and note that this outlet must be taken into account in relation to the proposed channel design.	Additional details added to Section 7.8.5 regarding the offline nature of the pond and incorporation of a future outlet channel if alterations to the feature are proposed.
69	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that bat exit surveys and inventory and assessment of Black Ash is still to be completed. However, subsequent sections indicate that the bat exit surveys have been completed. Further, as the identified Black Ash locations are within protected features, the purpose of assessing them is not understood. Clarify and/or revise accordingly.	Section 7.9 has been updated to clarify that bat exit and Black Ash surveys were completed in 2025. As a 30m radius surrounding healthy Black Ash stems are also afforded protection under O.Reg. 7/24 and Black Ash can occur outside of wetland boundaries, assessments were undertaken to identify/verify habitat constraint areas for future design refinements in proximity to areas where the species occurs.
70	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that an interim Significant Woodland assessment was initiated. Similarly, it is indicated that a Significant Wildlife Habitat assessment, a SAR assessment and an initial assessment of preliminary constraints was initiated. As these must be finalized in the study, clarify/revise accordingly.	The word "initiated" has been replaced with "completed" for these instances in Section 7.9.2.
71	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that the natural heritage data was compiled/synthesized with an emphasis on the Phase 1 lands. As the study must comprehensively address the Phase 1 and 2 lands, clarify/revise accordingly.	Phase 1 and Phase 2 lands were reviewed in detail. Revised in Section 7.9.2 to delete this phrase.
72	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that personal communication with Tom Dolson revealed that the issue of agriculturally related woodland removal was adjudicated in Provincial Court and, because the court ruling supported woodland removal for agricultural purposes, none of the historic woodland areas that were removed without approvals are considered for restoration. Based on the information in Appendix Q, Mr. Dolson appears to be the landowner to whom a Permit # W2014-003 under the Woodland Conservation By-law was issued for woodland removal on 12679 Mississauga Road. In the absence of details of the court ruling, which appears may have only been in relation to Permit # W2014-003, it is not appropriate to assume that the ruling applies generally to other woodland removals in the study area that have occurred without approvals. These include removals on 12652 Creditview Road (a portion of the area indicated on Figure 19 as "Removed prior to 2015"), 1890 Mayfield Road (a portion of which is indicated on Figure 19 as "Removed prior to 2020"), 12240 Creditview Road (indicated on Figure 19 as "Removed prior to 2022") and 12466 Mississauga Road (see comments on the Headwater Drainage Feature assessment above). These woodland removals must be considered when demonstrating a net benefit as required by Future Caledon Policy 13.9.2. For clarity, those woodland area must be treated as 'existing' when comparing existing and proposed woodland area. The same discussion is also provided in Section 10.4 - ensure that it is also revised accordingly.	Addressed: Text updated in Section 7.9.3 and Section 10.4.1. Figure 21 - Existing Natural Features/Conditions has also been revised to reflect the expanded area of the historically removed and existing woodland area.
73	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: The discussion regarding the plantation woodland on 12116 Chingacousy Road does not fulsomely address policy requirements. As per Future Caledon 13.9.1 c), the LSS must refine and implement the recommendations of the SABE Scoped SWS. Therefore, in order to support removal and compensation of the feature, it must be demonstrated that the guidance for managing features of the NHS contained within the Part C report of that study is being followed. To that end, the classification of the woodland feature must be determined and the respective guidance followed. While not discussed in the LSS, through discussion with the consultant team in relation to grading approvals prior to the review of the LSS, it is understood that the feature meets Supporting Features and Area woodland criteria. To ensure clarity, what woodland criteria is/isn't met must be outlined and it must be demonstrated that the plantation does not have any of the factors outlined in Section 2.1.3.2 of the Part C report that would lead to protection in-situ for Supporting and Other Features. Additionally, it is indicated that woodland compensation planting for removal of the woodland that achieves a net benefit will be provided in an EIR. The LSS must demonstrate that a net benefit is achievable. If it is not within the existing conceptual Natural Features and Areas (NFA) designation, additional NFA must be proposed. Refer to comments on the NHS broadly in this regard. Finally, note that, based on aerial and street view imagery, the delineation of the woodland on Figure 19 is not supported at this time. For example, the direction provided by staff regarding mapping the western limit of the woodland (email from J. Elliott to M. Hense), July 25, 2025) was not followed. For efficiency, it is recommended that the delineation is vetted with staff before the next submission. The same discussion is also provided in Section 10.4 - ensure that it is also revised accordingly.	Addressed: Section 7.9.3 and Section 10.4.1 have been updated accordingly.
74	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Figure 19 (Existing Natural Features/Conditions) omits several key features, supporting features, and other features mapped in the PSA and SSA in the SABE Preliminary NHS. As per Future Caledon policy and the approved LSS ToR, the LSS must confirm/refine the preliminary NHS according to the targets and criteria contained within that study. To that end, it must be demonstrated that key/supporting/other features are not present, or they must included on Figure 19. For example, a key feature woodland mapped in the Preliminary NHS on 12134 Mississauga Road was highlighted by staff during the woodland staking exercise but nothing on this feature has been provided other than preliminary ELC. If proper characterization and analysis is not possible, SABE Preliminary NHS features that are on non-participating properties must be included as existing features, recommended for future confirmation/refinement through site-specific study when access is available, and included in the proposed NHS on Figure 22.	Addressed: We have added key features noted in the SSA located in close proximity to the PSA (Woodlands A and H) consistent with SABE Figure DA2-10. The example of potential woodland on 12134 Mississauga Road was investigated by the consulting team and as a an example of refinement was found to be Cultural Meadow/Savannah and not woodland, so the proper characterization of existing features shown on Figure 21 - Existing Natural Features/Conditions was completed and is accurate.

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75	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that bat snag surveys were not completed in Woodland G because it was partially logged. Revise to indicate that the woodland was partially removed without approvals, enforcement was undertaken by the Town, and a court order issued requiring the restoration of the removed area.	Section 7.9.9 updated with suggested verbiage related to Woodland G.
76	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that decay class #1 and #2 were factors in determining high quality snags. MNR guidance indicates that decay class #3 should be included in the criteria. Clarify if this omission affected the results and/or revise accordingly.	Reference to Decay Class #1 and #2 was included in error, and has been revised to Decay Class #1 to #3 as more typically supporting high quality snag trees. For clarity, high quality snag trees can be identified across any decay class, however are most often associated with Decay Class #1 to #3. Upon review of the dataset, this revision does not influence the results of the bat snag study.
77	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that high density of snags corresponds to 10/ha. However, Figure 2B in Appendix R indicates that high corresponds to 51+ snags/ha. Clarify and/or revise as appropriate.	As described in Section 7.9.9, MECP guidance documents state that a snag density >10 snags per hectare corresponds with high quality woodland-roosting habitat. The categories outlined on Figure 2B (Appendix S of the ISS) speak to relative snag densities across woodlands within the study area, to understand which woodlands provide the best quality/highest concentrations of bat snag trees. For clarity, it should be understood that all sampled woodlands are consistent with high quality woodland roosting habitat per MECP guidelines.
78	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that identification of SAR bat species and relative activity will be identified. For clarity, revise to indicate that it was completed. Additionally, clarify why only SAR species identification is highlighted as SWH species were also included.	Section 7.9.9 has been updated to refer to past tense, with regard for acoustic monitoring data review methodology. The reference to SAR has been removed, as all bats in Ontario are either SAR or in the case of Big Brown Bat, can contribute to SWH function.
79	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Table 30 and Figure 2B in Appendix R inconsistently identify ELC communities and/or their location. Revise to ensure the same information on both. It is indicated that Figure 2B displays ELC communities on lands that were accessible. However, it also displays ELC communities on lands that were not accessible. All ELC communities on inaccessible properties should be identified as preliminary.	The wetland ELC code for SWDM3-3 will be revised to SWDM2-2 to reflect the dominant tree cover of green ash with sub-dominants of silver maple and Freemans maple. Revisions to the ELC text descriptors will be undertaken to indicate that ELC communities on inaccessible properties is preliminary, as they were based on observations from abutting participating landowners as well as non-participating landowners (access permissions granted)
80	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: All of the SAR bird observations from the Tables in Appendix S are not displayed on Figure 2B in Appendix R. Similarly, the report text doesn't match Table 5 in Appendix T with respect to amphibian observations. Woodlands G and I are referred to in the report text but could not be found on Figure 2B. Similarly, some wetlands are not labelled. Midland Painted Turtle is not a Provincial SAR but is labelled as such on Figure 2B. At least one of the ELC communities is mapped incorrectly (FODM7-3 adjacent to W6). Revise accordingly.	All observations associated with SAR birds documented throughout the study area are shown in Figure 2B (exception: Barn Swallow). In some cases, SAR birds were heard singing/calling from more than one survey station (and thus reported more than once on tables in Appendix R). With regard for Barn Swallow, in some locations foraging activity has widespread and a manner not conducive to illustrating these locations with individual points. Figure 2B has been modified with regard for Barn Swallow, showing only locations where potential breeding/nesting activity was observed (i.e. manmade structures). No updates required to amphibian survey methodology text. Amphibian results text updated to clarify Beacon surveys identified five (5) calling amphibian species, not four (4). Table 5 updated to clarify that incidental Wood Frog calls were recorded in Woodlands E-F and I; otherwise no updates required. Figure 2B updated to correct minor error showing duplicate of survey station #20; correct ID for survey station #20 is station #4, and has been adjusted. Woodland G label has been added to Figure 2B. Woodland A, Woodland I, and Wetland 4 labels were also missing from Figure 2B and have been added. Midland Painted Turtle has been removed entirely from Figure 2B, recognizing that the species is not a provincial SAR. The FODM7-3 label for the community adjacent to Wetland 6 has been adjusted to correctly
81	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Barn Swallow is listed in the Tables in Appendix S as Provincially Threatened but it is a Special Concern species. The text indicates that no other SAR species were detected but then indicates that Barn Swallows were present throughout the area suggesting that it is not being considered a SAR when other Special Concern species are. Revise accordingly.	Provincial status for Barn Swallow is Special Concern, and has been corrected in tables within Appendix R. Report text has been corrected to clarify that Barn Swallow is SAR (Special Concern). Context for habitat mapping as described in Comment #80 above has also been added to this section.

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82	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Wetland significance on Figure 2B is not clear. While it is indicated that W7 was re-evaluated as non-significant, it appears to be mapped the same as PSWs. Similarly, W6 is mapped differently than the other PSWs. Revise for clarity.	Figure 2B has been updated to clarify wetland statuses within the Primary and Secondary study areas, using terminology consistent with the Town OP. Wetland #7 is mapped as "Non-Significant Wetland ELC Communities (Boundary Updated 2024)" with symbology adjusted more clearly differentiate from "Staked and Surveyed Provincially Significant Wetland". Wetland #6 is mapped differently from other PSWs due to its boundary update filed with MNR in 2024, mapped as "Significant Wetland ELC Communities (Boundary Updated 2024)".
83	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: The north, west and south boundaries of W1 are indicated as staked and surveyed on Figure 2B but appear to correspond with lot lines. Confirm that TRCA staked these boundaries or revise the figure to not display staked and surveyed boundaries in these areas.	As CEA understands, TRCA and Crozier staked the wetland boundary of this features on lands to which they had access. Wetland 1 as mapped by Azimuth on Figure 2B is part of the MNR mapped Etobicoke Creek Headwaters II Wetland Complex, with the full extent of Wetland 1 contained in the Ontario MNRF Aurora District Locally Significant Etobicoke Creek Headwater II Wetland Complex (OMNRF March 2016) and contains inventoried data by the TRCA in 2003 as part of the faunal and flora surveys and an ELC/wetland communities inventory undertaken for the upper portion of the Etobicoke Creek watershed (TRCA 2003)
84	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Staked and surveyed wetland boundaries are displayed/labelled on Figure 2B but the woodland boundaries are not labelled. Ensure that the staked boundaries are on all figures and labelled accordingly. The conifer plantation must also be displayed/labelled as a woodland but with boundaries not confirmed.	Figure 2B has been updated to include outer limits of staked woodlands, shown as "Staked & Surveyed Woodland Edge (Town & Beacon, Nov. 2023)" The conifer plantation in the southeast portion of Phase 1 (TAGM1) has been labeled TAGM1 (Preliminary Woodland Boundary), noting the woodland limits are not confirmed and subject to verification at a later date.
85	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Woodland G was not identified as bat maternity SWH despite having similar numbers of the required species as other woodlands that were identified as supporting that SWH that are much higher than the required thresholds. Revise accordingly.	As Woodland G was cleared, this unit did not meet the snag density threshold (>10 snags/ha, >25cm DBH) for consideration as SWH for Bat Maternity Colonies. It is understood that these conditions may have been present prior to woodland clearance, but it was not possible to determine snag densities following tree removal. Regardless, this unit was sampled for presence of SAR bat habitat.
86	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Figure 2B displays the general location of SWH and SAR observations. The SWH and SAR habitat must also be mapped and included as a constraint.	It is our opinion that for the purposes of the LSS, relevant habitat centroids in combination with text descriptions is sufficient for communicating areas of potential constraint due to SAR and SWH. LSS mapping is broad-scale and would be rendered unnecessarily convoluted/possibly illegible by overlaying all habitat limits for all relevant taxa/habitats. It is recommended that SWH and SAR polygon mapping be prepared as part of future EIR studies as part of a more fine-scale mapping exercise.
87	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that the SAR assessment will be finalized once data from the Conservation Authorities and the Region has been obtained. It is understood that this data was obtained and incorporated into the study. It is indicated that the results of the SAR assessment is summarized in Section 7.8.11 which does not exist. Clarify and/or revise accordingly.	References to pending SAR data have been deleted, as all SAR data has been obtained. Tenses for SAR screening have also been modified to reflect completed SAR screening. Reference to Section 7.8.11 summary was meant to refer to Section 7.9.12, which has been updated.
88	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Table 7 in Appendix X indicates that Grasshopper Sparrow was not observed but Table 8 indicates that it was observed. Clarify and/or revise accordingly.	Reference to Grasshopper Sparrow in Table 8 of Appendix X was included in error and has been deleted.
89	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: It is indicated that mapped Redside Dace habitat is located downstream of Tributary 4. However, several other HDFs also contribute to that habitat. Similarly, Redside Dace associated with Huttonville Creek is located downstream of other HDFs. Due to recent changes to the Endangered Species Act, contributing habitat for Redside Dace is no longer formally identified or protected. However, contributing functions must still be maintained. Revise accordingly.	Additional clarity added to Section 7.9.12 regarding potential Redside Dace contributing habitat in downstream features/HDF features within the Huttonville Creek Subwatershed. Overall, the 'no management' HDF recommendation and poor indirect fish habitat observed in these features limits their contributing function to downstream Redside Dace habitat, but inclusion of these features in future MECP consultation can still be completed for due diligence purposes.
90	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Table 7 indicates that Eastern Wood Pewee was observed in Woodland F. However, the report text omits this woodland. Revise accordingly.	Section 7.9 lists Woodland F as habitat for Eastern Wood-pewee, however it was missed under "Terrestrial Species at Risk" header. Woodland ID has been added to this list as well.

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91	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 7.9: Clarify why it is indicated that NHIC restricted species will be investigated as part of a LSS update and/or revise accordingly.	Due to data sensitivity of Restricted Species, this sentence has been deleted. Given no Restricted Species occurs proximal to the Primary Study Area and would therefore not be impacted by the proposed development, it is preferred if species ID is not revealed.
92	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.0: It is accurately indicated that the Alloa Secondary Plan is approved. However, in referring to Figure 20 as the Alloa Secondary Plan instead of the proposed land use plan, the report is indicating that the land use plan has been approved. Revise to reflect the approved Secondary Plan policies which indicate that the Natural Features and Areas lands are conceptual, subject to change, and to be finalized through approval of the LSS and/or EIRs. It is inaccurately indicated that the Secondary Plan identifies a Natural Environment System Area designation. The land use designation is Natural Features and Areas. Revise for clarity. As it displays incorrect land uses, revise Figure 22 to match Figure 20 (Land Use Plan).	Addressed: Section 10 has been revised accordingly to more specifically reference the Land Use Plan. The Enhanced NHS represented on Figure 25B - Enhanced Natural Heritage System is more accurate than the Land Use Plan (Figure 22 - Approved Alloa Land Use Plan). Figure 22 will not be revised.
93	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.4:It is alternately indicated that the proposal includes a >150% and a 200% increase in natural cover. The increase must be demonstrated through a GIS analysis of natural cover pre to post. Figure 22 includes buffers in the 'Additional Post-development NHS'. Note that, as per the SABE SWS Part C report, buffers are not to be counted in assessing the required 30% increase in natural cover. Ensure that all areas proposed for removal and compensation are included in the analysis. Additionally, it must be demonstrated that a net benefit is being proposed. To that end, provide a GIS analysis of channel length, wetland cover and woodland cover pre to post. It is acknowledged that pre and post channel lengths for the Alloa and Lyons Drains and some HDFs have been provided; however, some Conservation HDFs realignments were not reported and none of the Mitigation HDFs were reported (note comments on those above). It is acknowledged that Figure 23 suggests that HDFs are proposed in the drain corridor(s) but it is not clear what lengths are being provided. It is also acknowledged that pre to post wetland cover has been provided - confirm that the only wetland proposed for removal is W7 or revise to include all wetland removals. For instance, the outstanding issue of whether a wetland is present along HDF FC-1 must be resolved (refer to CVC email to Suzanne St. Onge dated July 3, 2025). Additionally, it must be demonstrated that open BMPs consistent with the HDF guidelines (e.g., not SWM pipes) for all of the Mitigation management recommendations are being provided. It is indicated that the specifications for restoration will be confirmed with agencies. The target communities must be proposed, and it must be demonstrated that they are feasible in order to conduct the GIS analysis. It is noted that Figures 23 - 25 do not propose any woodland communities. As woodland is proposed for removal, additional NHS area may be required to accommodate woodland compensation.	The letter and mapping prepared by GEO Morphix dated May 30, 2025 noted that there are no wetlands mapped along Reach FC-1. This is based on ELC community mapping prepared in support of the LSS. Based on the site conditions observed on June 5 and June 13, 2024 and the agricultural lands tillage history, the Reed-canary grass-graminoid marsh meadow (MAMM1-3) does not qualify by MNR (2022) definition as wetland. Due to the size of the corridors proposed, HDFs with Conservation management classifications can be easily accommodated with the realigned corridors. TRCA and CVC (2014) HDF guidelines for Mitigation HDFs require replication of function only (i.e., no requirement to replicate length). Text has been added to Section 10.5 and Appendix M to note that the function of Mitigation HDFs will be replicated, which is consistent with TRCA and CVC (2014) guidelines. Pre and Post Natural Area Calculations are provided on Figures 25A and 25B and on Table 73 .
94	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.4: Figure 22 (and Figures 23 - 26) and the report text do not indicate what widths of channel/HDF corridors/linkages are proposed. Appendix M only provides bankfull and meander belt widths for the watercourse channels. However, Dwg 2A appears to indicate finalized corridor widths. Clarify the proposed approach and/or revise accordingly. If final determination of the corridor widths is being deferred to the EIR(s), that must be explicitly stated and all factors that need to be considered outlined. However, it is noted that Appendix M provides Conceptual Corridor Design drawings. As those have been prepared, it appears that corridor widths can be outlined.	Addressed: additional text to explain corridor width variation has been added in Section 10.4.2. Final corridor widths will be finalized through detailed EIR and FSR reporting. Figures 26 to 29 are high level renderings to demonstrate overall corridor elements and do not contain any dimensions. As noted, conceptual channel design drawings and proposed channel dimensions are contained in Appendix M. The features within the realigned corridors will be further refined as the Phase 1 and Phase 2 EIRs proceed.
95	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.4: Figure 22 provides a summary of buffers included in the NHS. This does not reflect the associated discussion which indicates that they are minimum buffers that will be further evaluated through subsequent planning stages. Revise accordingly. Additionally, the discussion indicates that the minimums were established based on the fact that no buffers exist currently. The current situation has no relevance to the proposal which must protect the form and function of the NHS in relation to the proposed land uses. Finally, the discussion indicates that the buffers could be reduced further in the EIR(s). This is unlikely to be supported and isn't consistent with calling them minimum buffers. Revise accordingly.	Addressed: Section 10.4.2.1 comments have been considered and minimum buffers have been emphasized.
96	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.4: Ensure that Figure 22 and associated discussion is updated as necessary when addressing all other comments.	Acknowledged
97	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.4:The discussion on road crossings of the NHS is not clear but appears to indicate that all terrestrial crossings are not proposed to have any wildlife passage structures included. This must be supported with clear demonstration on why that isn't necessary. If that is not possible at this stage, a recommendation for future analysis must be included. It is indicated that embedded closed-bottom box culverts will be used for aquatic crossings with only consideration of open bottom culverts. However, Appendix M proposes open bottom culverts which contrasts with the report text. As they provide a lower risk of impaired aquatic and fluvial functions over the long-term, revise to indicate that open bottom culverts will be used. Additionally, a recommendation to include terrestrial passage through the aquatic culverts must be included. Spans a minimum of 3x the bankfull width as indicated on Figures 23-24 are acceptable in this regard provided suitable substrate is supplied. However, Appendix M proposes culvert widths that are less than 3x the bankfull widths (see comments below). Revise accordingly.	Addressed: Section 10.4.2.3 Road Crossings Through NHS, text has been revised.

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98	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: It is indicated that HDF LD4-3D is proposed for realignment but, despite a channel corridor being displayed on Figures 22, LD4-3E and AD4-3 are not discussed. Appendix M indicates that a dry swale feature is proposed for those features. It is not clear how this aligns with the HDF management recommendations (see associated comments above). Clarify and/or revise accordingly and include discussion in this section. Additionally, the portions of FD1 and AD3 that flow along the woodland edge should be recommended for rehabilitation through natural channel design.	The text in Section 10.5.6 and Appendix M has been updated to note that the linkage proposed between Woodlot C and the Alloa Drain is in keeping with a Mitigation HDF management classification. Refer to the response to Natural Heritage Comment #36. Reach FD1 of the Fraser Drain is not proposed for realignment at this time. Reach AD3 is proposed for realignment as part of the main Alloa Drain corridor and will form a continuous connection with the woodland to the south.
99	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: It is not clear where Figures 23 -26 (conceptual channel cross-sections) are proposed. Provide clarity. Figure 25 should include the 3x bankfull span width for road crossings that is on Figures 23 and 24.	The text in Section 10.5.6 and Appendix M has been updated to note that the linkage proposed between Woodlot C and the Alloa Drain is in keeping with a Mitigation HDF management classification. Refer to the response to Natural Heritage Comment #36. Reach FD1 of the Fraser Drain is not proposed for realignment at this time. Reach AD3 is proposed for realignment as part of the main Alloa Drain corridor and will form a continuous connection with the woodland to the south.
100	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: Subject to addressing all associated comments, while the approach to channel corridors is generally supported, it must be demonstrated that suitable hydrology can be provided to support them. While the analysis in Appendix M is supported, it only applies to constructed wetlands in the Alloa drain corridor. It must be demonstrated that all constructed channels/HDFs will be supported. Notably in this regard, Dwg 36 displays a preliminary Hwy 413 crossing for pre-development flow conveyance to the proposed Alloa channel. It appears on aerial imagery that a HDF is present in this area that was not assessed. This HDF is also mapped in the SABE Scoped SWS (see related comment above indicating that all SABE Preliminary NHS features must be addressed). Clarify what is intended for this drainage.	The low flow channels in each designed corridor are based on hydrology provided by Urbantech to ensure that the designed channels are appropriately sized. The channel dimensions are currently designed to the 2-yr storm event which is a conservative approach as typically natural channels have bankfull dimensions matching the 1yr to 2yr flows. Therefore the proposed designs are suitable for the anticipated hydrology. Geometries, planforms and profiles will be further refined as Tertiary Plans proceed. The feature shown in the Highway 413 preliminary design plans and the SABE Scoped SWS appears to be largely based on a desktop review. This feature was reviewed in the field by GEO Morphix and was determined to be a furrow that was intermittently present in an agricultural field. As furrows are not considered HDFs, it was not mapped and a management classification was not assigned. It is acknowledged that the preliminary design plans for Highway 413 show a culvert at this location. The Project Team will continue to review Highway 413 plans as the highway design and Tertiary Plans proceeds to ensure that proposed infrastructure that borders/affects the Alloa Secondary Plan is understood and accommodated, as appropriate.
101	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: Clarify why Appendix M includes design parameters for LD4-1 when that reach is a watercourse within a protected wetland and/or revise accordingly. Similarly, clarify why design parameters were only provided for AD5-1 when the channel extends upstream.	Existing Reach LD4-1 is not proposed for realignment. Design Reach LD4 Reach 1 is shown on the map in Appendix G of Appendix M . It is the downstream portion of existing Reach LD4-4, west of existing Reach LD4-3. Existing Reach AD5-1 is located immediately upstream of the Alloa Drain; however, the Design Reach AD5 extends the entire length of the realigned drainage feature. Refer to Appendix G of Appendix M for existing and designed reach locations and extents.

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102	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 10.5: Table 26 in Appendix M provides average bankfull widths that are less than the bankfull widths provided for individual reaches in previous tables in the Appendix and duplicated in the report text. This results in culvert widths that are less than 3X bankfull width. Clarify and/or revise accordingly.</p>	<p>A non-nested bankfull channel design approach was used within the crossings in the Alloa Drain Reaches AD 1, 3, 4, and 6 for constructability of the channel. As such, these non-nested channel widths were used when providing the crossing width recommendations. This resulted in the discrepancy between the bankfull widths in the crossing recommendation table (formerly Table 26 in Appendix M, now Table 29) and the bankfull dimensions provided in Section 7.2 of Appendix M, as the dimensions of the nested and non-nested channels differ. To clarify this difference, bankfull tables for the Alloa Drain reaches through the crossings have been revised in Section 8 of Appendix M.</p> <p>The provided structure spans for ADX5 to ADX7 and LDX1 are still slightly narrower than the recommended crossing spans based on three times the average bankfull width; however, the crossing spans are greater than 3 times the proposed riffle width, which the stone through the crossing was hydraulically sized to match. In addition, the spans still allow for an approximately 6 m toe erosion allowance on either side of the channel. Notably, the constructed channels within the crossings will be formalized and contain hydraulically sized substrates to mitigate erosion as vegetation will not establish. The proposed geometries will also be further refined during detailed design. Currently the channels have been sized to the 2-yr event which is a conservative approach used for the conceptual design stage. The provided spans are considered adequate from a geomorphologic perspective.</p>
103	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: The photographs were duplicated in Appendix M. Revise accordingly.	The appendix has been revised to remove the duplication.
104	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 10.5: Note that the Conceptual Natural Corridor Designs included in Appendix G of Appendix M were not reviewed as they will be reviewed at subsequent planning stages.	Acknowledged.
105	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11: Table 44 must include woodland cover and SABE SWS linkage and enhancement requirements as an impact evaluation factor and these must be included in the evaluation. Additionally, as it is included in Table 45, it should also include Maintenance of Drainage Density.	<p>Addressed: Section 11, Table 50 has been revised to include the referenced items.</p> <p>The maintenance of drainage density has been removed from Table 50. A function-based approach is applied to address low order tributaries through application of TRCA and CVC (2014) guidelines.</p>
106	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11: Comparison of Dwgs 3A and 3D reveal pre to post changes to some of the catchments contributing to the Mayfield Road outlets. Further, volumetric changes to these outlets will result from increased imperviousness. The LSS must demonstrate that there won't be any impacts to downstream wetlands.	The downstream wetlands were assessed as part of the feature-based water balance model for the Block 51-2 development located south of the subject lands. The Block 51-2 FBWB model will be refined/updated at the Tertiary Plan stage for the Alloa development, to include the most current design for the subject lands. It is not anticipated that there will be any adverse impacts to the downstream wetlands as a result of the subject development, due to the flow-through nature of these features
107	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: It is indicated that the terrestrial impact assessment requires a completed field program and analysis that will be completed in an EIR. It was understood that the field program is complete other than inventory and assessment of Black Ash (it is not clear what this entails). Further, the section also indicates that Table 62 evaluates the potential impacts. Additionally, it is indicated that removal of Tributary #3 and associated pond will be assessed. This contrasts with other sections of the report that indicate that the tributary is proposed to remain (e.g., Table 62). Clarify and/or revise as appropriate.	Addressed: Section 11.10 has been revised accordingly
108	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 11.8: As outlined, minimum buffers are to be established in the LSS based on the general land uses and the sensitivities of adjacent features. This was not done.</p> <p>Additionally, as outlined in comments above, SABE SWS linkage and enhancement requirements were not addressed.</p> <p>Finally, woodland cover must be assessed in demonstrating a net benefit.</p>	Addressed: Section 11.10 has been revised to address the noted concerns.
109	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: It is indicated that it is assumed that agricultural land uses will continue over the long-term where urban land uses are not designated. Given the only proposed land use that isn't urban corresponds to the NHS, clarify to what this assumption is referring. If it is referring to existing agricultural fields designated Natural Features and Areas, those cannot be included as natural cover, woodland cover, etc. The mechanism by which existing agricultural fields will be converted into natural areas must be outlined to be counted in the required pre to post analysis. Similarly, it is indicated that it was assumed that natural system components located within active agricultural areas are less likely to be expanded or restored than those dedicated within public open space. Clarify what this is referring to and how it was factored into the impact assessment.	Addressed: Section 11.10 has been revised to explain how floodplain areas factor into the calculations of pre and post natural cover.

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110	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: It is indicated that linkages to Huttonville Creek will correspond with the Mount Pleasant Secondary Plan. Clarify how this relates to the western proposed linkage and on what basis that was selected.	The Alloa Land Use Plan was designed with reference to Future Caledon Schedule D2a (New Urban Area Preliminary Natural Environment System). Per Future Caledon direction, two NHS linkages were shown on the Alloa Land Use Plan connecting the Alloa Drain to the planned NHS systems across Mayfield Road.
111	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: It is indicated that linkages that flank existing natural features can serve to reduce buffer needs. As it does not appear that any such linkages are proposed, clarify if/how this was factored into the impact assessment.	Linkages that flank existing natural features are referring to floodplain area that becomes designated as Natural Features and Areas within the Land Use Plan and present broader areas of buffer and setback beyond minimums and/or buffers required to mitigate impacts to the features and/or functions of the woodlands and wetlands located within the Alloa Secondary Plan Area.
112	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: Table 62 (Impact Assessment): It is indicated that infiltration deficits can be mitigated through LID measures. Infiltration targets must be established, and it must be demonstrated that/where LID measures are feasible. Factors such as soil properties, depth to groundwater and public versus private ownership must be included when assessing feasibility. Only depth to groundwater has been assessed in the submission materials. See related comment below.	<p>The location of suitable LID BMP measures is shown on Drawing 3E (included in the Scoped Servicing Study in Appendix K of the LSS) and is based on the proposed grading and groundwater information provided by Crozier, as well as soil information in the hydrologic model. As directed by the Town, all LID measures will be placed within public ownership. With respect to the target recharge volumes, the targets were based on the most conservative sensitivity analysis scenario (Low Runoff, which implies the most required recharge). This approach ensures that sufficient consideration is provided for LID sizing at this early stage. The infiltration targets were established for the overall site based on the continuous modelling in the Scoped Servicing Study. The LID designs will be refined as the continuous model is updated / calibrated when sufficient data becomes available.</p> <p>Additional information on LID feasibility has been provided. Feasibility metrics to assess LID potential are noted in Section 7.1.1 and commentary on feasibility metrics with relation to LID implementation is included in Section 18.1.2. Concur that additional site specific soil properties will be collected at later stages to ensure proper LID functionality.</p>
113	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: Table 62 (Impact Assessment): As outlined above, a GIS analysis (with figures) is required to demonstrate the % increase of natural cover and woodlands. Demonstration of the SABE linkage and enhancement requirements is also required.	Addressed: Refer to Figure 21 and Figures 25A and 25B for the Existing Natural Features/Conditions and Enhanced Natural Heritage System. Net natural area cover calculations have been summarized on both figures under pre-development and post-development conditions. The SABE linkages enhancement requirements have been factored into the Alloa Enhanced Natural Heritage System.
114	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: Table 62 (Impact Assessment): As the intent of buffers are to mitigate impacts from the proposal, it is not appropriate to refer to them as contributing to a net benefit or counting them when meeting targets.	As agreed through a discussion with Town staff, buffers have been removed from consideration during calculation of natural cover targets.
115	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 11.8: Table 62 (Impact Assessment): It is indicated that impacts to Significant Woodlands will be compensated but this has not been outlined/demonstrated.	Addressed: See Figures 25A and 25B and Table 73, Section 17.6
116	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 15.0: It is indicated that the natural features will be dedicated to the Town in an as-is condition. This does not conform with Future Caledon 13.12.4 (d) or the approved Alloa Secondary Plan 7.20.10.2.4. Revise accordingly.	Addressed: Section 15.0 has been revised accordingly
117	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 15.0: Include the requirement to implement the goals, recommendations, targets, criteria of the SABE Scoped SWS study from Future Caledon and outline how the study has done this (see related comments above ensuring this).	Addressed: Section 15.0 has been revised accordingly
118	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 15.0: It is incorrectly indicated that development is not proposed within the natural environment system. Revise to acknowledge the planned roads and trails within the NES.	Addressed: Text has been revised within section 15.4
119	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 17.0: The discussion on wetland water balance contrasts with other sections of the report as it relates to groundwater contributions. Revise accordingly. It is not clear what is meant in indicating that no further mitigation is required for the wetlands as none has been proposed in the LSS.	Addressed. Mitigation per TRCA recommendations have been included in Section 17.3.
120	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 17.0: Table 63 refers to Core wetland fishery and Valley and Stream Corridors. Revise to be consistent with terms used elsewhere in the LSS.	Addressed: Text in Table 66 has been revised to be consistent with terms used throughout the LSS
121	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 17.0: As outlined for wetlands, revise Table 63 to require a net gain to woodland cover.	Addressed: table is revised to note net gain requirement for woodlands
122	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 17.0: The draft SWH guidelines referred to in Table 63 have no standing. Revise to refer to the EcoRegion Criteria Schedule.	Addressed: Revised to reference the EcoRegion 6E Criteria Schedules.

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123	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 17.0: It is indicated that infiltration LIDs should be incorporated to meet water balance deficits and that studies prior to draft plan approval should be conducted to confirm suitable areas. Given that the wetlands and the Alloa drain in the Secondary Plan area are supported by groundwater, water balance must be matched pre to post-development. As this has the potential to affect land use boundaries and given Secondary Plan policy 7.20.10.2.3 that indicates that the Natural Features and Areas designation will be finalized through the LSS and/or EIRs, the feasibility of implementing infiltrative LIDs (i.e., suitable areas), must be demonstrated prior to draft plan studies.</p> <p>It is acknowledged that Figure 27 indicates that most of the PSA has suitable depth to groundwater to implement infiltrative LIDs. However, Section 18.1.1 appears to contradict this in some wetland catchments.</p> <p>Infiltration targets for draft plan of subdivision and the work that remains to demonstrate the feasibility of meeting them (soil conditions, hydrogeological refinement, ownership, potential locations) must be addressed in the EIRs. Revise the report to outline this. It is noted that Section 18 appropriately indicates that the location and preliminary design of proposed LIDs is to be determined at the Tertiary Plan/FSR stage.</p>	<p>LID feasibility have been outlined in Section 7.1.1, explored further in Section 11.2 and preliminary commentary on a wetland basis has been provided in Section 18.1.2.</p> <p>Section 7.1.8.10 - ESGRAs and Section 11.2.3 and Section 18.1.1 have been included which discusses the importance of ESGRAs as well as the current areas of existing infiltration that should be prioritized when making final LID location selection. Figure 30 demonstrate suitable depth to groundwater, while Figure 14 and Figure 15 have been created to show ESGRAs on the study area and the potentiometric surface across the site.</p> <p>Infiltration targets for draft plan of subdivision and the supporting work to demonstrate feasibility will be addressed at the EIR/FSR stage. Report has been revised accordingly.</p>
124	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 17.0: It is indicated that the hydrologic modelling should be calibrated to confirm/refine the analysis completed based on the sensitivity analysis, but it doesn't indicate when that must occur. As it has the potential to affect land use, it must be indicated that this must occur at the tertiary plan/EIR/FSR stage.</p>	<p>As agreed with the agencies, calibration will occur when there is sufficient monitoring data that satisfies the TRCA and Town requirements. In lieu of the calibrated model, the sensitivity analysis models will continue to be used to test the site wide water balance, erosion analysis, and feature-based water balance.</p>
125	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 17.0: Section 17.5 references the Secondary Plan Land Use Plan but does not acknowledge the associated policies indicating that the boundaries of the Natural Features and Areas designation are only conceptual and are to be confirmed through the LSS and/or EIRs.</p> <p>Further, it is indicated that the proposed NHS provides an opportunity for a net increase in woodland area, but this has not been demonstrated and it appears that it may not be the case.</p>	<p>Addressed: Section 17.6 has been updated to address policy consideration and net increase in both woodland and wetland area.</p>
126	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 17.0: It is indicated that the EIRs are required in support of future draft plans of subdivision. Revise to indicate that the EIRs are required in relation to Tertiary Plans for Phases 1 and 2.</p>	<p>Addressed. Please refer to revised verbiage in Section 17.6.</p>
127	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 18: W3 is excluded from being identified as groundwater supported - which contrasts with earlier sections. Revise accordingly.</p>	<p>Addressed. See Section 18.</p>
128	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 18: Candidate Significant Woodland and Significant Wildlife Habitat is referred to. All areas that meet criteria must be identified as confirmed, not candidate.</p>	<p>The word "Candidate" has been removed where included in this section.</p>
129	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 18: As it appears that the identified locations are within protected areas (two locations displayed on Figure 28 in Appendix R), clarify why a Black Ash health assessment at the EIR stage is recommended.</p>	<p>Refer to response to Jason Elliott comment #69 above.</p>
130	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 18: Clarify why the possibility of SAR bat habitat being identified is discussed when it has been identified in the study or revise accordingly. Additionally, SWH bat maternity roost habitat must be included in the associated recommendation. Similarly, clarify why it is indicated that a fulsome SAR assessment can be finalized (it is alternately indicated that this will be done in the LSS and in the EIR) and the SWH assessment will be updated when all field work is completed and/or revise accordingly. It is understood that all of field work has been completed.</p>	<p>References to "possibility" have been removed. Text has been updated to reference potential impacts to SAR bats and SWH for Bat Maternity Colonies.</p> <p>Reference to additional field work and finalization of the SAR Assessment at the EIR stage has been deleted. References locations of identified Threatened and Endangered species (i.e. based on 2025 Black Ash and bat exit studies) has also been revised in accordance with study results.</p>
131	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 19: It is indicated that the EIR(s) will develop a woodland compensation plan. While development of the plan at that stage is acceptable, as outlined above, the LSS must demonstrate that appropriate compensation is achievable in the Natural Features and Areas designation and/or that designation must be expanded to achieve it.</p>	<p>Addressed: See Figures 25A and 25B and Table 73, Section 17.6</p>
132	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 19: While a list of future studies is provided, the work to be completed at the EIR/FSR must be clearly outlined.</p>	<p>The FSR contents will be similar to other FSRs completed adjacent to the study area (e.g. Mayfield West Phase II) and will include components to define the stormwater management include water balance and climate change, storm servicing, water and sanitary servicing, grading, channel design, phasing, roads, and external works.</p>
133	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 20: It is indicated that the LOG intends to provide monies to the Town to implement the CAMP. This requires further discussion.</p> <p>Additionally, as some of the monitoring actions are proposed to be completed by the CAs or other unspecified agencies, it is not clear how this would work.</p>	<p>Agreed. Coordination and agreement with the Town is required and will be finalized as a part of the EIS/EIR work.</p>
134	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	<p>Section 20: Monitoring duration/timing is not consistent with earlier section of the LSS. Revise to ensure consistency.</p>	<p>All stormwater management facilities, LID features, surface water monitoring stations, and groundwater monitoring shall be monitored for a period of 2-years following completion of 90% buildout. The CAMP and associated sections in the LSS have been updated to reflect this change.</p>

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135	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 20: It is indicated that the frequency/duration of monitoring for some items are to be determined in consultation with the Town and CAs. Outline when the CAMP is proposed to be finalized.	Addressed. In Sections 19 and 20 it is noted that the requirements for the CAMP are to be finalized at the EIR/FSR next stages of the project.
136	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Section 20: As site alteration has already begun, confirm that all monitoring stations have been established and that monitoring outlined to begin before the site alteration activities has been completed. As the stated intention is to provide monies to the Town to undertake the monitoring (see comment above), it appears that the CAMP has not been followed.	All monitoring stations have been established and monitoring is ongoing. The stated intention to provide monies to the Town for monitoring per the CAMP relates to the post-construction scenario.
137	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Other Local Subwatershed Study Comments: Clarify why no data is provided in Appendix O for Turtle Basking Station #4. As outlined in the LSS ToR Response to Submission #2 comments, any amphibian observations during the turtle surveys at this location must also be reported. Revise accordingly.	As detailed in the LSS, turtle basking surveys were conducted in only one location (station #1 proximal to the pond (OAO) in Wetland #6). Incidental amphibian observations were documented at this location, most notably, an incidental observation of an American Bullfrog triggering SWH. As outlined in the Terms of Reference, Survey Station BTS4 was excluded from the survey program based on the understanding that the ponded feature at this location is an agricultural swale subject to routine ploughing, and as such would not be considered a candidate for relevant Significant Wildlife Habitat functions as it relates to Turtle Wintering Areas. There is also no expectation that this agricultural swale provides SAR turtle habitat function. Minimal standing water was observed onsite in summer 2024, and based on air photo review the feature was dry and/or ploughed over in 2025, 2023, 2022, 2021, and 2020, indicating that natural/naturalized conditions are absent during most years. It is noted that the Town observed terrestrial crayfish burrows at this location, however given the location is manmade/maintained through agricultural practices, the feature would not be considered potential SWH for Terrestrial Crayfish. Figure 28/38 have been updated to remove Turtle Basking Station #4 and added a point illustrating observation of a terrestrial crayfish burrow at that location.
138	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	The Transportation Needs Assessment and drawings associated with the Scoped Servicing Study include an active transportation trail system. Clarify why this was not identified or assessed in the LSS.	Addressed: A figure (from Urbantech) denoting the proposed Active Transportation Trail System has been added to the document (See Figure 24 - Drawing 4A Proposed NHS System and Trails Map) and Sections 10.4, Table 65 (Environmental Impacts) , 16.3 and 17.6.
139	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Scoped Servicing Study Comments: It is indicated that Dwg 2A displays NHS boundaries and buffer limits. Revise to indicate that these are preliminary and will be finalized at the EIR stage. Clarify why Dwg 2A indicates that the wetland and woodland limits on the east side of Woodland 1/Wetland 1 require staking given the large expanse of NHS proposed adjacent to the features.	Acknowledged; the boundaries and buffer limits will be finalized through the Draft Plan process / in the EIR and FSR. Drawing 2A indicates that future staking is required due to access / ownership constraints).
140	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	The proposed 11mm of LID retention for erosion control substantially exceeds the infiltration water balance target of 2mm for the Etobicoke Creek portion of the study area. Providing 7mm in the Alloa drain corridor is acceptable; however, given they are supported by groundwater, the remaining 4mm could affect wetland water balance. This must be addressed in the LSS/SSS.	Crozier to address re: groundwater input to wetlands with increased infiltration target of 11mm.
141	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Infiltration targets for the Fletchers Creek portion of the study area are provided. These must be reflected in the LSS. However, it is noted that Dwg 3E displays limited opportunity to meet these targets near the SWM ponds. It must be demonstrated where/how these targets can be achieved.	It should be noted that the Fletcher's Creek water balance infiltration targets are discussed in Section 3.6.1 (Table 3.39) of the Secondary Servicing Study, provided in Appendix K of the LSS. LID placement and sizing is to be confirmed at the Tertiary Plan stage.
142	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Neither the SSS nor the LSS provides targets for the Huttonville Creek portion of the study area.	Targets for erosion control and flood control within the Huttonville Fletcher's subwatershed are provided in Sections 3.3.2 and 3.3.3, respectively, of the Scoped Servicing Study (provided in Appendix K of the LSS). Targets for infiltration within the Huttonville Fletcher's subwatershed are provided in Section 3.6.1 of the Scoped Servicing Study (provided in Appendix K of the LSS).
143	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	Water Resources Peer Review Comments: Several peer review comments flagged items for Town Natural Heritage's attention. These comments were reviewed with resultant comments below.	No action

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144	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	#54: Clarify why it is indicated that consideration of the benthic data will be included in the updated LSS document when it was included.	Addressed: Refer to Section 7.8.4.
145	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	#67: Several inaccurate statements are contained with the study team's response. The buffers have not been deemed appropriate and acceptable - as outlined in the May 28, 2025 email from Jason Elliott to Mike Hensel, the acceptance of trail-in-buffer cross-sections was caveat upon demonstration in the LSS and/or EIR that the resultant buffer widths will mitigate negative impacts on the adjacent features and their functions. This would also apply where no trails are proposed in the buffer. The cross-sections were not provided and the demonstration was not completed in the LSS as only minimum buffers were proposed with future refinements to be undertaken at the EIR stage. Additionally, the road crossings have not been accepted, and the Enhanced NHS has not been finalized (see related comments above).	Addressed: Comments provided herein are addressed throughout all sections of the report per responses provided above.
146	Natural Heritage	Oct 7 2025	N/A	N/A	Oct 7 2025	#68: It is inaccurately indicated that the buffers have been confirmed through field studies and discussion with agency staff. As indicated in relation to #67 above, the buffers have not been confirmed with Town staff.	This has been clarified throughout the report and clear references to minimum buffers should be noted and it is accurate to note that minimum buffers have been confirmed with Town staff.

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TRCA (*note comments renumbered per October 16, 2025 version received)							
1	TRCA	Nov 20 2024	Section 7.4 of the LSS – Hydrology and Hydraulics: In Table 16, under the erosion assessment, it is noted that continuous Visual OTTHMD will be applied to confirm whether the proposed extended detention criteria adequately meet the targets east of Chinguacousy Road. However, this section, and in other parts of the report, appear to assume that erosion control criteria consist solely of extended detention. It is noted that erosion control includes two main components: the extended detention requirement and the runoff volume control requirement. Conducting a comprehensive erosion control assessment will assist in accurately determining these requirements. Extended detention focuses on slowing the release of stormwater runoff into receiving watercourses to reduce peak flow rates, which helps mitigate erosion during and after storm events. In contrast, the runoff volume control requirement aims to minimize the overall volume of water reaching watercourses to reduce stress and prevent erosion. Accurately defining both extended detention and runoff volume control requirements will ensure that post-development exceedance aligns with pre-development exceedance levels unless over-control is needed. The applicant is asked to establish erosion control criteria that includes both extended detention and runoff volume control requirements.	For Etobicoke Creek, GEO Morphix will evaluate the effectiveness of proposed SWM measures using an in-house erosion threshold exceedance model and continuous hydrology modelling. This work was previously completed for the EIR for the Phase 1 lands; however, the analysis will be updated for the second LSS submission using revised pre- and post-development continuous hydrology modelling provided by Urbantech. As agreed to through consultation with CVC, previously approved erosion thresholds and target release rates will be used to inform the stormwater management strategy for the Fletchers Creek and Huttonville Creek subwatersheds. It is acknowledged that erosion mitigation analysis are ongoing as part of studies within the Heritage Heights lands. As information becomes available it will be integrated in the LSS, where appropriate. Notably, the drainage area within the Secondary Plan Area associated with West Huttonville Creek and Heritage Heights is relatively small and no SWM Pond is proposed to direct drainage to this subwatershed. An erosion control assessment will be completed as part of the LSS. It should be noted that the sensitivity analysis completed as part of the hydrologic evaluation of the subject site will also be included as part of the erosion control assessment.	Oct 16 2025	TRCA staff note that the sensitivity analysis applied to size stormwater management criteria appears conservative in lieu of calibration, providing confidence in the interim results. As outlined in the LSS Terms of Reference, calibration of the continuous hydrologic model remains a critical step to confirm criteria, particularly for erosion analysis, wetland water balance, and frequent flow assessment. TRCA staff support the use of sensitivity analysis in the absence of calibration data, while emphasizing the importance of calibrating the model once sufficient monitoring data is available to refine and validate conclusions through the next planning phases.	Acknowledged
2	TRCA	Nov 20 2024	Section 7.4.2 of the LSS – Hydrologic Model Updates: The parameters and methodology used to derive the updated parameters for the Etobicoke Creek hydrology model, along with the flow comparison results presented in Table 18 of the LSS are acceptable.	Acknowledged.	Oct 16 2025	No further response required.	Acknowledged
3	TRCA	Nov 20 2024	Section 7.4.3 of the LSS – Continuous Hydrologic Model: The single-event Etobicoke Creek Hydrology model has been calibrated to simulate several single-event storms, with the primary objective of assessing flood risk associated with individual flood-causing events. In contrast, a continuous hydrology model is designed to simulate both the low and high flows of the hydrograph by accounting for moisture variations within the system. Since these models serve different objectives, the applicant is asked to ensure that the continuous hydrology model needs to be calibrated using continuous observed data.	As per recent meetings including various agencies on April 23, 2025 and April 29, 2025, it was agreed that a sensitivity analysis is to be completed for the continuous hydrology model until sufficient monitoring data is available for model calibration. As discussed, it was agreed that the sensitivity analysis would assess hydrologic impacts for the continuous model by evaluating a minimum and maximum range for certain hydrologic parameters. Certain results, such as runoff coefficient, from the sensitivity analysis have also been compared to other studies to confirm that the minimum and maximum ranges established as per the sensitivity analysis, are suitable.	Oct 16 2025	Please see Comment 1 for reference.	Acknowledged
4	TRCA	Nov 20 2024	Section 7.4.3 of the LSS – Existing Hydraulic Model West of Mississauga Road: TRCA appreciates the collaborative approach taken in developing area-specific solutions for the hydraulic modelling in the area. TRCA agrees with the general approach. However, it is noted that TRCA previously provided comments on this area in May of 2024, which have not been addressed. Additionally, please note that there are outstanding comments regarding the general approach to the proposed channel corridor sizing, the model evaluation report, and the supporting studies/model results. The applicant is asked review and provide responses to TRCA's May 2024 comments. For ease of reference, TRCA's May 2024 comments can be found in Appendix III of this correspondence (see below under May 27, 2024 date).	The TRCA comments from May 2024 have been addressed. Further to the meetings held with TRCA and Town staff in 2024 and 2025, and subsequent correspondence and collaboration at the April 2025 workshop, we have arrived at an agreed-upon approach for the hydraulic modelling. Floodplain mapping between Mississauga Road and Chinguacousy Road has been conducted using a 1D, steady-state hEC-RAS model for existing and interim/ultimate conditions. To evaluate riparian storage, a dynamic / unsteady-state modelling approach has been accepted. The channel block has been increased in size by an additional 10m compared to the 1st submission based on the model findings and TRCA recommendations. The floodplain west of Mississauga Road was evaluated with a 2D model as agreed with TRCA staff.	Oct 16 2025	Please refer to comments 27 and 28.	Acknowledged
5	TRCA	Nov 20 2024	Section 7.4.6 of the LSS – Existing Riparian/Flood Storage: Please note that floodplain storage, encompassing both dead and active storage, is vital for effective runoff management. Dead storage refers to water that remains stagnant and does not contribute to downstream flow, while active storage involves water that can be mobilized and aids in flow routing. Both forms of storage are crucial for temporarily holding runoff, thereby reducing the volume and velocity of water that moves downstream. This attenuation effect can significantly lower peak flows in downstream areas, helping to mitigate flood risks and improve overall watershed management. Therefore, it is essential to maintain both dead and active storage in floodplain to achieve effective flood control and water resources management. The applicant is asked to amend the report to correct the assertion that dead storage does not contribute to managing downstream flood risk.	The report text has been amended as requested to include TRCA's explanation of dead storage.	Oct 16 2025	TRCA staff confirm that the amendment to the report regarding dead storage is acceptable. Comment addressed.	Acknowledged
6	TRCA	Nov 20 2024	Section 10.1 of the LSS – Proposed Alloa Secondary Plan: Within this section, it is noted that “the enhanced Natural Heritage System has been designed to accommodate regional storm conditions while also providing and celebrating the extensive greenway corridors that are central to the proposed Land Use Plan.” However, this claim will only be valid if the design of the proposed Natural Heritage System effectively maintains the conveyance and flood storage of the valley system during Regional Storm conditions. The applicant is asked to clarify this matter.	Through extensive consultation with the TRCA and Town staff, it has been agreed that the proposed reduction in floodplain storage of the valley system has a negligible impact on the hydraulics of the corridor during Regional Storm conditions. Please refer to Section 11.3 of the LSS for details. Further detail is also provided under separate cover in the <i>Scoped Servicing Study</i> prepared by Urbantech (August, 2025).	Oct 16 2025	Comment addressed.	Acknowledged

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7	TRCA	Nov 20 2024	<p>Section 10.5 of the LSS – Conceptual Natural Channel Design Summary: The applicant has proposed to realign majority of the Alloa Drain, specifically reaches AD2 to AD6. The following preliminary design objectives have been outlined for the channel:</p> <p>a. Restore a more natural physical form, including planform and instream characteristics. b. Enhance channel functionality by increasing flow interactions with the floodplain. c. Incorporate a mix of coarse and fine sediment sources through the low-flow channel and floodplain. d. Improve aquatic habitat by providing a morphologically diverse channel with spatially varied flows. e. Enhance riparian habitat through the installation of woody plantings and dynamic floodplain features. f. Mitigate potential hazards to the development and the surrounding lands. g. Replicate existing Wetlands 6 and 7 within the realigned corridors.</p> <p>It is important to also emphasize maintaining existing flood storage of the valley system as essential for TRCA to manage natural hazards. As such, the applicant is asked to include an objective which identifies that the design must preserve current flood storage.</p>	<p>Preserving current flood storage to the greatest extent possible will be added as a natural corridor design objective.</p> <p>Section 10.5 has been revised to include maintaining flood storage as design objective for the NHS.</p>	Oct 16 2025	Comment addressed.	Acknowledged
8	TRCA	Nov 20 2024	<p>Section 10.5.1 of the LSS – Wetland Replication: It is noted that the applicant has proposed offline wetland features within the corridor. It is understood that the design of these features must account for the water sources and pathways through which water will reach the wetlands. The applicant is asked to confirm whether this analysis and supporting calculations have been completed to ensure that the proposed offline wetland features will function as intended.</p>	<p>At this level of study, the LSS is to provide preliminary recommendations regarding the sources of water and potential conveyance mechanisms that will support the proposed offline wetland features. While the wetlands are identified as "offline," they remain riparian in nature and in most cases will continue to receive water from the adjacent watercourse through natural or engineered connections (i.e., proposed stormwater management facilities).</p> <p>A hydrological analysis is being undertaken as part of the LSS second submission to confirm that there is sufficient water available to support wetland function. Where necessary, additional or potential alternative water sources will be identified, including surface runoff, stormwater discharge and clean water pipe systems.</p>	Oct 16 2025	Comment addressed.	Acknowledged
9	TRCA	Nov 20 2024	<p>Section 11.3.1 of the LSS – Proposed Hydrologic Model: The applicant is asked to provide a plan which illustrates the proposed drainage area delineation along with catchment IDs that correspond with the submitted Visual OTTHYMO model</p>	<p>A proposed drainage plan with model IDs corresponding to the VO model has been included in the resubmission.</p>	Oct 16 2025	Comment addressed.	A drainage schematic will be included in the response submission. The comment has been addressed already as per the comment in column I. Drainage plans are referenced within the Scoped Servicing Study (Appendix K of the LSS)
10	TRCA	Nov 20 2024	<p>Section 11.3.4 of the LSS – Proposed Riparian/Flood Storage: Please note that the TRCA does not accept any reduction in flood storage capacity. While the proposed trapezoidal channel design between Mississauga Road and Chinguacousy Road may enhance flow conveyance, it is crucial to maintain the storage capacity of the floodplain to effectively manage flood risk. Any reduction in flood storage could lead to increased peak flows and heightened potential for flooding downstream. Flood hazard management, including the potential for loss of life and property damage, must be approached through a comprehensive, watershed-scale perspective that considers cumulative and incremental impacts. The significance of these impacts cannot be overstated, as many adverse effects within a watershed stem from the cumulative and incremental impacts of individual developments that have not adequately mitigated their effects on the natural system and associated hazards. Unchecked, these cumulative impacts can severely undermine TRCA's capacity as a watershed manager to protect the public from natural hazards and restore vital natural resources necessary for effective hazard management. Given natural hazards, such as floodplains, cover extensive areas, any interventions within floodplains – such as filling or reducing flood storage – should be avoided or at least balanced by equivalent reductions to maintain overall storage capacity. Even seemingly minor instances of floodplain filling can create negative precedents, leading to significant cumulative and incremental impacts over time, which can result in severe consequences over an entire watershed. As such, TRCA requires the applicant to revise their design to either preserve or enhance flood storage to ensure long-term safety and resilience of the watershed.</p>	<p>Based on the changes discussed with TRCA staff through meetings and workshops in 2024 and 2025, namely application of the 1D, unsteady state HEC-RAS model and adjustment of Manning's roughness values, the proposed change in riparian storage is minimal. It has been agreed with TRCA to increase the channel block by 10m (bottom width) to provide additional storage. The net impact of the change in storage has no (significant) impact on the routing of flows and will not affect the general relationship between flood storage and discharge.</p>	Oct 16 2025	Comment addressed.	Acknowledged
11	TRCA	Nov 20 2024	<p>Section 2.5.3 of the Phase I FSR – Stormwater Management (SWM) Pond Stage-Storage-Discharge Characteristics: According to TRCA's quantity control criteria, the targets for the 100-year and Regional storm events are 0.718 cm and 2.95 cm for SWM Pond 1. However, the applicant has used a 100-year target of 1.506 cm (as shown in Table 2-9 below), which is double the established target, and the Regional target has not been specified. The applicant is asked to revise the target rates accordingly.</p>	<p>This will be addressed in the forthcoming Alloa Phase 1 Tertiary Plan FSR, anticipated to be submitted in</p>	Oct 16 2025	<p>All eight stormwater management (SWM) ponds have been sized in accordance with TRCA's 2013 Etobicoke Creek Hydrology Update criteria. No further response is required at this time.</p>	<p>It should be noted that SWM Pond 1 is within CVC jurisdiction within the Huttonville Fletcher's subwatershed. Therefore, the target flows from the Huttonville Fletcher's SWS apply to SWM Pond 1, per the Phase 1 FSR.</p>

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12	TRCA	Nov 20 2024	Section 2.5.3 of the Phase I FSR – Stormwater Management (SWM) Pond Stage-Storage-Discharge Characteristics: According to TRCA's quantity control criteria, the targets for the 100-year and Regional storm events are 0.458 cm and 1.882 cm for SWM Pond 2. However, the applicant has used a 100-year target of 0.913 cm (as shown in Table 2-10 below), which is double the established target, and the Regional target has not been specified. The applicant is asked to revise the target rates accordingly.	See above - to be addressed in Alloa Phase 1 Tertiary Plan FSR.	Oct 16 2025	All eight stormwater management (SWM) ponds have been sized in accordance with TRCA's 2013 Etobicoke Creek Hydrology Update criteria. No further response is required at this time.	It should be noted that SWM Pond 2 is within CVC jurisdiction within the Huttonville Fletcher's subwatershed. Therefore, the target flows from the Huttonville Fletcher's SWS apply to SWM Pond 2, per the Phase 1 FSR.
13	TRCA	Nov 20 2024	Section 2.5.4 of the Phase I FSR –Drawdown Time: Given the potential for back-to-back storms, it is essential that the drawdown period does not exceed 5 days (120 hours). It is important to explore additional on-site retention strategies, which as retaining up to 10 mm of runoff and directing it to constructed wetlands, to ensure that a portion of the runoff volume is retained on-site.	See above - to be addressed in Alloa Phase 1 Tertiary Plan FSR.	Oct 16 2025	TRCA staff will review this information in the Alloa Phase 1 Tertiary Plan Functional Servicing Report (FSR). No further response is required.	Acknowledged
14	TRCA	Nov 20 2024	Section 2.5.4 of the Phase I FSR – Drawdown Time: The applicant is asked to implement the on-site retention of 5 mm of runoff from the total impervious area to mitigate erosion impacts on receiving watercourses. The retained water can be managed through infiltration or evapotranspiration using Low Impact Development (LID) measures.	See above - to be addressed in Alloa Phase 1 Tertiary Plan FSR.	Oct 16 2025	TRCA staff will review this information in the Alloa Phase 1 Tertiary Plan Functional Servicing Report (FSR). No further response is required.	Acknowledged


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15	TRCA	Nov 20 2024	<p>Section 18.1.1 of the LSS: TRCA staff have reviewed the submitted Hydrogeology information contained within the LSS and have concerns relating to infiltration-based LID measures in the following locations:</p> <p>a. Wetland 1: Groundwater levels in the vicinity, as measured in monitoring wells (MW24-1 and MW24-2), were less than 1 metre below ground surface. This suggests that implementing infiltration measures in this area may be difficult.</p> <p>b. Wetland 2: Two monitoring wells, MW24-7 S/D, were installed near the wetland. In MW24-7 (D), groundwater levels were recorded above ground surface on three out of four monitoring occasions. In the shallow piezometer, water levels were less than 1 metre below the surface, and an upward hydraulic gradient was observed. As a result, infiltration measures may not function effectively in this area.</p> <p>c. Wetland 4: Infiltration measures are likely to be ineffective in this area, as groundwater levels in the nearest monitoring well (MW23-106, referenced as Well No. 106 in Tables 4 and 6) were above ground surface on nearly all monitoring occasions.</p> <p>d. Wetland 5: The closest monitoring wells, MW23-411 D/S (referenced as Well No. 411 in Tables 4 and 6), recorded flowing conditions in both shallow and deep wells during all monitoring events. Due to the presence of flowing artesian conditions, infiltration measures may not be feasible in this vicinity.</p> <p>e. Wetland 6: MW409 S/D, located at the northern end of the wetland, recorded seasonally high groundwater levels close to the ground surface and upward hydraulic gradient between the shallow and deep monitoring well. Flowing groundwater conditions were observed in monitoring well MW403 (referenced as Well No. 403 in Tables 4 and 6), located west of the central part of the wetland. These conditions raise uncertainty about the success of infiltration measures around this area. Drilling another monitoring well is recommended near the southern end of the wetland.</p> <p>f. Wetland 7: Monitoring wells MW23-104 S/D (referenced as Well No. 104 in Tables 4 and 6) have consistently shown groundwater levels above the ground surface in the deep well. The shallow monitoring well also recorded above-ground levels in three out of five monitoring events, with levels close to the surface on the other two occasions. As such, implementing infiltration measures in the immediate vicinity may not be feasible.</p>	<p>It is interpreted that the water levels measures on site are representative of a potentiometric surface rather than true groundwater level. An extensive confining layer is located across the Alloa lands. Based on the in field investigation, the top of the confining layer is located approximately 0.7 to 2.4 meters below surface. As long as the confining layer remains intact, groundwater should not be encountered above 0.7 mbgs. Where the confining layer is greater than 1 meter below surface, infiltration through LID measures is possible. Please note that specific LID measures and specific locations will be recommended at individual draft plans.</p> <p>a. Wetland 1: Groundwater levels in the vicinity, as measured in monitoring wells (MW24-1 and MW24-2), were less than 1 metre below ground surface. As indicated above, the water levels obtained at MW24-1 and MW24-2 are confied water levels representative of the potentiometric surface rather than a free groundwater table elevation. MW24-1 encountered a dense silt till with clay confining layer from 0.76m to the bottom of the borehole at 6.0m with no identifiable aquifer unit. MW24-2 encountered a clayey silt till confining layer from 1.83m - 4.88m and then a fine sandy silt unit from 4.88 - 6.0m where the screen was installed.</p> <p>b. Wetland 2: MW247-5 is screened within a layer consisting of grey fine sand with silt, stone and gravel from 4.57m - 6.09m below grade and MW24-7 (D) is screened within a medium sized gravel and cobble zone located beneath a red/grey silty fine sand layer from 6.09m - 7.62m below grade. Both of the screened units are beneath clayey silt and silty clay layers from ground surface to a depth of at least 3.51m below grade which confined the units. The two wells were installed offset from one another with a continuous bentonite seal in the annular space to ensure that the two screened zones were not hydraulically connected. The measurements from MW247 D/S represent potentiometric observations and are not indicative of the free groundwater surface. Samples above 3.51m did not indicate the presence of groundwater. While it is accurate that there is an upward groundwater gradient, it is not anticipated that groundwater will be encountered within the first 3.51m below grade. As a result, infiltration measures <u>are</u> a possibility in this area.</p> <p>c. Wetland 4: MW23-106 water levels that were recorded have been above ground in many cases. It is important to note that MW23-106 is screened across three different units, a sandy silt till from 0.8m - 4.5m (moist), a clayey silt till from 4.5m - 6.0m (moist) and a silt with trace sand from 6.0m - 6.7m (wet). It is likely that the water levels observed in MW23-106 are representative of the potentiometric surface of the lower silt/trace sand layer located below the confining clayey silt till layer. Crozier will continue to monitor water levels at this location in a manner that will address the cross screening issue. This will be addressed as part of future planning applications as the results don't impact the conclusions of the current study. Crozier is of the opinion that infiltration measured <u>are</u> still a possibility at this location.</p> <p>d. Wetland 5: Monitoring well MW23-111 D/S was incorrectly labelled as MW23-411 D/S in the report. This error has been rectified and therefore this comment will address the comments for MW23-411 D/S but with the proper naming convention of MW23-111 D/S. MW23-111 S is screened across a silts sand lense located 3.1m below grade within a unit of clayey silt till material. MW23-111 D is screened beneath the confining clayey silt till material within a sandy silt unit and just piercing a clayey silt till unit. Water level observations have been above grade at both locations which is indicative of a pressurized system. It is not anticipated that free groundwater will be observed above the initial silty sand zone located at 3.1m below grade.</p> <p>e. Wetland 6: MW409-S is screened within a silty sand till and slayey silt unit from 3.1m - 4.6m below grade. This unit is overlain by a clayey silt till confining layer with a thickness of 1.3m. Water levels observed within MW409-S are representative of the potentiometric surface of the confined layer, not the free groundwater surface. These artesian conditions would be observed until excavation extended to a depth exceeding the bottom of the confining later at 3.1m below grade. MW409-D is screened within deeper layers that MW409-2 which are also confined by the layer above MW409-S and are therefore also representative of the potentiometric pressure. MW403 is screened across two different units, a clayey silt till from 0.8m - 6.1m (moist) and a silty sand from 6.0m - 6.7m (wet). It is likely that the water levels observed in MW403 are representative of the potentiometric surface of the lower silt/trace sand layer located below the confining clayey silt till layer. Crozier will continue to monitor water levels at this location in a manner that will address the cross screening issue. This will be addressed as part of future planning applications as the results don't impact the conclusions of the current study. Crozier will consider the recommendation to install another monitoring well near the southern end of the wetland at a location agreed upon with TRCA staff.</p> <p>f. Wetland 7: Monitoring well MW23-104 S is screened within a clayey silt till with the bottom of the screen located at 4.6m below grade. MW23-104 D is screened within the sandy silt located in the interval from 4.6m - 6.7m below grade but also intersects the overlying clayey silt till material with the sand pack. The water level observations are representative of pressurized aquifer measurements and not the free groundwater surface. Groundwater is not expected to be encountered within the first 2.3m below grade. Crozier will consider additional monitoring opportunities at this location to further understand the geology of the specific area and will update the information as part of a later submission.</p>	Oct 16 2025	<p>The response notes that the confining layer is present across the Alloa Lands, with the top of the layer ranging from 0.7 to 2.4 metres below ground surface (mbgs). In areas where the confining layer occurs at only 0.7 mbgs, the proposed LIDs would be located within the confining layer, creating significant challenges to implementing successful infiltration practices. If the recorded water levels represent a potentiometric surface rather than the actual groundwater level, additional site investigations are required at proposed LID areas to confirm the feasibility of the infiltration.</p> <p>Additional comments are provided for Wetlands 4-7 below:</p> <p>a) Wetland 4: The response indicates that the groundwater levels observed in monitoring well MW23-106 are likely representative of the potentiometric surface associated with the lower silt/trace sand layer located beneath the confining clayey silt till. While continuous monitoring of groundwater levels is proposed to reduce uncertainty, monitoring within the same well alone will not adequately resolve this issue. It is therefore recommended that an additional monitoring well be installed with a screen interval of approximately 2-3 metres below the proposed finished grades in this area to more accurately assess the feasibility of the proposed infiltration measures.</p> <p>b) Wetland 5: It remains unclear how infiltration measures can be implemented in the area represented by MW23-411 (S/D), where both shallow and deep monitoring wells exhibit flowing artesian conditions. Clarification is requested regarding the proposed depth and/or elevation of the infiltration facilities in the post-development condition for this area.</p> <p>c) Wetland 6: There is continued uncertainty regarding the potentiometric surface or water table, as monitoring well MW403 was screened across two different geological units. Although the installation of an additional monitoring well has been recommended and agreed upon, this uncertainty will persist until the results from the new well are available and evaluated.</p> <p>d) Wetland 7: The response notes that groundwater is not expected to be encountered within the first 2.3 metres below grade. Crozier has indicated that additional monitoring opportunities may be considered to further characterize the subsurface conditions, with updated findings to be provided in a subsequent submission. Staff supports the proposed additional investigation to confirm the depth to the free groundwater surface in all areas where Low Impact Development (LID) facilities are proposed.</p> <p>Lastly, the response also refers to Figure X as a map of potential LID locations. However, this figure was not found in the LSS. Please provide the page number where this figure is available. Lastly, the response also refers to Figure X as a map of potential LID locations. However, this figure was not found in the LSS. Please provide the page number where this figure is available.</p>	<p>Noted. Agreed.</p> <p>a) Agreed. Added as a recommendation in 18.1.2 to add additional site specific monitoring as required prior to the final siting of LIDs.</p> <p>b) Addressed. Commentary on feasibility of LID implementation in catchments have been included in Section 18.1.2.</p> <p>c) Noted. No action required until further monitoring data is available and evaluated.</p> <p>d) Noted. Added as a recommendation in 18.1.2 to add additional site specific monitoring as required prior to the final siting of LIDs.</p>
16	TRCA	Nov 20 2024	TRCA Hydrogeology staff expects that further investigations, as recommended in various section of the LSS including pages 42, 48, 206 and 221 will be conducted.	Acknowledged. Additional data has been collected and has been included in the 2nd Submission materials.	Oct 16 2025	<p>On Page 19 of the first LSS submission, it was indicated that additional piezometers, flow monitors, streamflow locations, and staff gauges would be installed in Summer 2024. The current response states that new data has been collected and incorporated into the 2nd Submission. Please identify all additional monitoring locations added in the 2nd Submission (August 2025) and indicate where this information is presented.</p>	Addressed. New locations discussed in Section 7.1.6 in LSS and included in Figure 8.

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17	TRCA	Nov 20 2024	Raising of grades has been identified as a potential mitigation measures to meet the pre-development water budget (page 206). The applicant is advised that it would be prudent to identify areas where filling is necessary and to determine the required extent of fill.	Grading is driven by boundary constraints (existing roads, existing features, etc.). Filling of the site will not be driven by LID placement. LIDS will be placed according to post-dev grading. Refer to Drawing 2.5.2 for additional information related to groundwater depth under post-development conditions.	Oct 16 2025	<p>The response states that the site will not be driven by LID placement; rather, LIDs will be positioned according to post-development grading. Section 17.2.2 of the first submission indicated that seasonally high groundwater conditions across the Alloa Lands made it infeasible to achieve the required 1 m separation between the base of the LID and the seasonally high groundwater level at existing grades. Raising site grades was recommended as a potential mitigation measure to meet the pre-development water budget (Page 206). This recommendation has been removed from the second submission (Page 250). Please clarify why this mitigation measure was removed and how infiltration deficits will be addressed, given the uncertainty.</p> <p>Further, Section 18.1.3 of the LSS indicates that the restoration concept for Wetland 7 along the Alloa Drain includes 14 wetlands, providing water balance mitigation with a combined surface water storage capacity of 20,791 m³ for infiltration within the corridor. Reference is also made to DWG 3E of the Scoped Servicing Study prepared by Urbantech for potential LID areas. Review of this drawing suggests that nearly the entire corridor is located in areas where groundwater levels will be above the proposed post-development grades. As a result, infiltration measures in the corridor may not be viable.</p>	Site grading has been optimized to the extent feasible at this stage to provide suitable separate for LIDs; however, it is not practical to accomplish this in all parts of the study area due to grading constraints around the NHS and allowable road slopes/transition grading.
18	TRCA	Nov 20 2024	Table 57 of the LSS outlines the proposed Comprehensive Adaptive Management Plan. Items 7 and 11 relate to baseflow maintenance. If baseflow impacts are identified, reassessment of the SWM Pond for enhance infiltration is proposed. It is noted that areas suitable for implementing the enhanced infiltration measures in the post-development scenario should be identified. This observation also applies to item 8 of Table 57 (Water Budget).	It is noted that the majority of the proposed SWM ponds are located in areas of high groundwater. Baseflow mitigation measures will be explored at the EIR/FSR stage subject to the final placement and grading details of the SWM facilities, per the Draft Plan. A high-level assessment of suitable locations for LIDs/infiltration with respect to groundwater elevation is included in the LSS.	Oct 16 2025	Comment addressed.	Acknowledged
19	TRCA	Nov 20 2024	Clarification is needed for items 11 and 12 of Table 57 relating to the duration of proposed monitoring. The applicant is asked to clarify the total duration of monitoring after buildout.	Table 72 (formerly Table 57) Items 11 and 12 have been updated. The CAMP proposes 3-year post-buildout monitoring period for groundwater.	Oct 16 2025	Comment addressed.	Acknowledged
20	TRCA	Nov 20 2024	The submitted materials identify realignment/enhancement for a significant portion of the Alloa Drain. The applicant is asked to provide some additional information on legislative requirements for altering the drain, along with details on how it will need to be managed in the future. The status of the drain and whether it will be maintained in a post development scenario must be considered in the context of the proposed realignment/enhancement.	<p>The Alloa Drain, Lyons Drain and Fraser Drain are subject to the requirements of the <i>Drainage Act, 1990</i>. Under Section 74 of the Act, municipalities are obligated to keep drainage works in good repair and operational condition. In support of this responsibility, a municipality appoints a Drainage Superintendent to oversee the inspection, maintenance, and repair of such drains.</p> <p>In the context of the proposed realignments and enhancements, any alteration to the municipal drains must follow the processes outlined in the Drainage Act. This may involve an engineer's report under Section 78 for improvement works and formal consultation with the affected landowners and the municipality.</p> <p>In addition, since portions of these drains traverse regulated areas, Section 28 of the <i>Conservation Authorities Act, 1990</i> also applies, requiring coordination with the TRCA. Where maintenance or repair may affect regulated features such as watercourses or wetlands, the Drainage Act and Conservation Authorities Act Protocol (2021) provides Standard Compliance Requirements (SCRs) to ensure environmental protection while allowing work to proceed without the need for a separate permit, provided that SCRs are met.</p> <p>Future maintenance of municipal drains within the Secondary Plan Area will need to be addressed through coordination with the municipality to determine the post-development status of the drain (e.g., maintained as a municipal drain or transferred to other management). These decisions will be informed through further discussions with the Town, TRCA and other regulatory bodies as the project progresses.</p>	Oct 16 2025	<p>Based on the response provided by the applicant, it is TRCA's understanding that legislation governing the drains will not impact the ability to realign them. Notwithstanding, the Town should understand that future maintenance requirements of the drains may impact broader natural heritage goals associated with the realignments. Comment addressed.</p>	Acknowledged
21	TRCA	Nov 20 2024	The implementation section of the LSS should be updated to provide direction on how the proposed realignment/enhancement of the Alloa Drain (and associated tributaries) will be operationalized. For example, information is needed on phasing/timing of the works along with next steps for detailed design and ultimately construction. Further, it is unclear how non-participating landowner parcels have been considered. It is noted that this may require the inclusion of relevant policies within the Secondary Plan to ensure the proposed realignment/enhancement works are carried out and implemented in a suitable manner.	<p>The importance of outlining implementation considerations for the proposed channel realignment and enhancement works is acknowledged. Given the nature and intent of the LSS, we respectfully submit that the appropriate place for detailing phasing, timing, and construction planning is at the EIR/FSR level and the subsequent detailed design stage. The LSS provides high-level recommendations to guide future implementation. Specifics regarding staging, landowner coordination, and detailed design sequencing will be addressed through the EIR/FSR in coordination with the Town and in accordance with land use planning mechanisms embedded in the Secondary Plan.</p> <p>URBANTECH: Please note a high level staging plan will be appended to the Secondary Plan Servicing Study which will provide some commentary on drain re-alignment.</p>	Oct 16 2025	<p>While TRCA appreciates that the applicant is proposing to complete this work at the EIR/FSR level, this is a critical component that needs to be considered at the LSS phase as well. As development of the Alloa Secondary Plan area will be occurring in two phases, the LSS must include a framework to ensure the all realignments are being coordinated/considered in an appropriate matter. Further, it is still unclear how non-participating landowners impacted by the realignments have been considered. Once a high-level plan/framework has been included as part of the LSS, TRCA agrees that specific details can be addressed at the EIR/FSR level.</p>	Drawing 8A has been included in the Scoped Servicing Study, which is within Appendix K of the LSS. This plan illustrates the conceptual phasing of the subject lands.
22	TRCA	Nov 20 2024	The applicant is asked to include a proposed condition constraint plan (or series of plans) within the LSS, which clearly depicts the limit of regulated features, hazards and buffers in relation to the proposed development. Based on the materials provided to date, staff are unsure if appropriate development setbacks have been applied to regulated features and/or hazards.	Please refer to the revised Figure 22: Enhanced Natural Heritage System for details.	Oct 16 2025	Figure 2A of the Scoped Servicing Study addresses this comment. It would be helpful if this figure was integrated into the LSS. Comment addressed.	Acknowledged

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23	TRCA	Nov 20 2024	As previously identified to the applicant, the property at 12602 Chinguacousy Road is subject to a TRCA violation. It is TRCA's understanding that a restoration order was issued, which indicated that the works were to take place by June 2024. Staff are unsure how this restoration order has been considered in the context of the proposed Natural Environment Network and overall land use plan. The applicant is asked to provide additional information on this matter.	Detailed design plans have been completed for the property at 12602 Chinguacousy Road and have been submitted to the Town for review and comment. The intent with the restoration work was to enhance the woodland area and provide additional upland native species. The woodland has been considered to function as a restored system and be a contributing part of the Natural Heritage System. The submitted restoration plan presently rests with the Town (Ecologist) as determinations about collector road routing through this area are being confirmed within the Towns Transportation Master Plan which is currently in process.	Oct 16 2025	It appears that the proposed restoration area for this site has been integrated into the Natural Heritage System, depicted on Figure 22 of the LSS and 2A of the Scoped Servicing Study. However, due to the outstanding violation, the entirety of the PSW (Wetland 5) within the woodland (Woodland G) was not staked by TRCA staff. Similar to what was done with Wetland 1, MNRF's wetland mapping can be used to estimate the remainder of the wetland. Relevant figures from the LSS and Scoped Servicing Study should be updated with this information to ensure this feature is appropriately identified.	Addressed: The outstanding violation associated with Wetland 5 did not factor into calculations for either existing features calculation nor for considerations of restoration area. The wetland boundary for Wetland 5 did utilize MNRF's wetland mapping to frame the remainder of the wetland area.
24	TRCA	Nov 20 2024	The full extent of Wetland 1 has not been appropriately identified in several figures of the LSS. Only a portion of this wetland was staked in the field, with the remainder of the feature being located on non-participating land holdings. The applicant should use a combination of TRCA's staked wetland limit and Ministry of Natural Resources (MNR) mapping to provide a more accurate depiction of the wetland.	It is acknowledged that the staked boundary (TRCA & Beacon) shown in the figure set and differs from actual wetland limits, as the lands staked with TRCA and Beacon did not include non-participating land holdings. Figures however clearly show the estimated limit of wetland via the lighter blue "Mapped Wetlands (MNRF, 2024)" layer, that includes the majority of the woodland/wetland (swamp) feature (Figure 2B and Figure 3B). The actual wetland limits include the consolidated boundary between the two layers.	Oct 16 2025	Comment addressed.	No action.
25	TRCA	Nov 20 2024	Section 15.6.1 of the LSS makes reference to TRCA policies and regulations. The applicant is advised that amendments to the Conservation Authorities Act were proclaimed into force on April 1, 2024. A new regulation for all Conservation Authorities (Ontario Regulation 41/24) also came into effect and TRCA's Ontario Regulation 166/06 was revoked. This section of the LSS should be revised accordingly to account for this new legislative landscape.	Acknowledged. LSS has been updated accordingly.	Oct 16 2025	Comment addressed.	No action.
26	TRCA	Nov 20 2024	The draft Secondary Plan policies make reference to the Alloa LSS in several locations. This should be revised to reference the correct name of the applicable study, which is the Alloa Local Subwatershed Study.	References updated per comment.	Oct 16 2025	Comment addressed.	No action.
27	TRCA	May 27 2024 Appendix III	West of Mississauga Road: The submitted memo, dated April 24, 2024, mentions TRCA acknowledged that "post-development flood storage does not have to match pre-development flood storage" for the Area 10 site. As a point of clarification, it is noted that TRCA agreed for the applicant to undertake to a "best efforts approach" to match post-development flood storage to pre-development flood storage for the Area 10 site. Please ensure this is corrected in all future reports relating to the matter.	Acknowledged - this wording (and approach) has been corrected - a best efforts approach has been taken for Area 10.	Oct 16 2025	Comment addressed.	No action.
28	TRCA	May 27 2024 Appendix III	Please note that the proposed channel corridor sizing and model evaluation for Area 10 was previously submitted to TRCA for review in 2023. However, as TRCA's review fee was never paid by the applicant, comments were not released. It is noted that as the formal Secondary Plan process for Alloa has now been initiated, through which review fees will be collected, TRCA will release comments relating to this site. Comments specific to these previously submitted materials can be found below, under the "Floodplain Mapping/Channel Modifications – Area 10" heading.	Acknowledged.	Oct 16 2025	No further response required.	No action.
29	TRCA	May 27 2024 Appendix III	Mississauga Road to Chinguacousy Road: TRCA appreciates that the model has been revised based on recent ground surveys for the surrounding lands (RPE, April 2024/ID Barnes, April 2024), which includes the low-flow channel survey of the Alloa Drain. The minor refinements incorporated in the model are acceptable.	Acknowledged.	Oct 16 2025	No further response required.	No action.
30	TRCA	May 27 2024 Appendix III	It is noted that floodplain mapping for the watercourse identified in yellow below has been removed as it has a drainage area of less than 50 ha. Please note that TRCA has a drainage area threshold of 50 ha for which floodplain mapping is required, however, there are situations where TRCA may require delineation of the floodplain even where the drainage is less than 50 ha. Notwithstanding, TRCA finds the proposed change to be acceptable.	Acknowledged.	Oct 16 2025	No further response required.	No action.
31	TRCA	May 27 2024 Appendix III	Downstream of Chinguacousy Road: It is noted that TRCA has approved the grading/cut and fill exercise for the FP Mayfield lands identified in yellow below. As such, this change is acceptable.	Acknowledged.	Oct 16 2025	No further response required.	No action.
32	TRCA	May 27 2024 Appendix III	It is noted that floodplain mapping for the watercourse identified below in yellow has been removed, however, it has a drainage area of approximately 115 hectares. TRCA recognizes that this watercourse is not within the subject lands. However, it should not be removed from the mapping.	Addressed in recent modeling submissions for Alloa - this watercourse has been retained in the modelling.	Oct 16 2025	Comment addressed.	No action.
33	TRCA	May 27 2024 Appendix III	Floodplain Mapping/Channel Modifications – Area 10: It is noted that the submitted model includes results of all intermediate runs. Please note that the final model should include only all result layers which correspond to the final model run. Please clean up the model to address the issue.	The final digital model files have been revised to include only the required layers and input data corresponding to the scenarios described in the LSS.	Oct 16 2025	Comment addressed.	No action.
34	TRCA	May 27 2024 Appendix III	The relevance of the input data identified below is not clear. Please enter only necessary input data and remove data that is not necessary for the model run.	The final digital model files have been revised to include only the required layers and input data corresponding to the scenarios described in the LSS.	Oct 16 2025	Comment addressed.	No action.
35	TRCA	May 27 2024 Appendix III	Please note that the submitted model does not run to the end. It is also noted that the proposed condition model gives the following error message and does not complete the simulation. Please correct this issue.	All model scenarios have been updated and confirmed to run properly.	Oct 16 2025	Comment addressed.	No action.
36	TRCA	May 27 2024 Appendix III	It is noted that a constant water surface elevation (taken from the 1-D steady model) has been used as the downstream boundary condition. Please revise it to gradually increase the water surface elevation, similar to the applied hydrograph timing (see example below).	The dynamic modelling for riparian conditions has utilized a normal water level condition.	Oct 16 2025	Comment addressed.	No action.

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37	TRCA	May 27 2024 Appendix III	It is noted that the input flows align with the 2013 Etobicoke Creek Watershed Hydrology Update. The regional storm peak flow, just upstream of Mississauga Road, measures 28.6 cm. Furthermore, there is an extra 32.2 cm of flow contributed from the subcatchment located downstream of Mississauga Road. Therefore, the total flow at the downstream boundary of the model is approximately 60.8 cm. The diagrams below illustrate the subcatchment, flow notes, and peak flows from each subcatchment at each flow node. Please revise the input flows as shown below.	The catchments downstream of Mississauga Road discharge flows at various tributaries from the north. These flows have been added at the confluence of the watercourses. The flows have been input as close to the actual locations as possible.	Oct 16 2025	Comment addressed.	No action.
38	TRCA	May 27 2024 Appendix III	After reviewing the existing condition model, it appears that a flow of 30.5 cm is exiting the study site towards the west, contrary to the flow direction of the watercourse. This flow ends up spilling into CVC's jurisdiction. In contrast, a flow of only 2.6 cm crosses Mississauga Road and toward the east. At the lower boundary of the study area, only 29.3 cm leaves the study area, which is less than the total flow of 60.8 cm that should have left the system. This indicates that over 95% of the flows generated upstream of Mississauga Road exit towards the west, according to the model result. Further investigation is required to provide a reasonable justification for this situation. The figure shown below displays flows leaving the system based on the proposed condition model (this is the model that did not run a complete simulation).	This approach is no longer being used for definition of the flood hazard and storage downstream of Mississauga Road. The total existing and proposed flows from the catchments upstream of Mississauga Road, assuming no spill, have been assigned at Mississauga Road in the 1D steady and unsteady state models.	Oct 16 2025	Comment addressed.	No action.
39	TRCA	May 27 2024 Appendix III	It is noted that flows leaving the system (see figure below) based on the proposed condition model (per incomplete simulation) is similar to the existing condition model. Please provide clarification as to why this situation occurs.	This comment refers to the outdated quasi-steady state modelling / 2D modelling. This approach has been abandoned as agreed with TRCA staff, and the updated 1D unsteady modelling demonstrates that there are slight differences in the various scenarios.	Oct 16 2025	Comment addressed.	No action.
40	TRCA	May 27 2024 Appendix III	The figure below compares water surface elevations of existing and proposed conditions. While there are no significant differences between them in terms of water surface elevations, there is a significant loss of flood storage. Please note that TRCA requires revisions to the grading plan so that best efforts are made to reduce the loss of flood storage.	Based on the changes discussed with TRCA staff through meetings and workshops in 2024 and 2025, namely application of the 1D, unsteady state HEC-RAS model and adjustment of Manning's roughness values, the proposed change in riparian storage is minimal. It has been agreed with TRCA to increase the channel block by 10m (bottom width) to provide additional storage. The net impact of the change in storage has no (significant) impact on the routing of flows and will not affect the general relationship between flood storage and discharge.	Oct 16 2025	Comment addressed.	No action.
41	TRCA	May 27 2024 Appendix III	TRCA staff analyzed the flood volume storage on the subject property for both existing and proposed conditions. The values obtained were 170,913 m3 and 96,644m3 respectively. Due to fill placed within the floodplain, there will be a loss of 74,268 m3 of flood storage. Please note that the 74,268 m3 of water will be exiting the system and into CVC's jurisdiction. Please note that TRCA requires revisions to the grading plan to show that best efforts have been made to reduce the loss of flood storage.	Based on the changes discussed with TRCA staff through meetings and workshops in 2024 and 2025, namely application of the 1D, unsteady state HEC-RAS model and adjustment of Manning's roughness values, the proposed change in riparian storage is minimal. It has been agreed with TRCA to increase the channel block by 10m (bottom width) to provide additional storage. The net impact of the change in storage has no (significant) impact on the routing of flows and will not affect the general relationship between flood storage and discharge.	Oct 16 2025	Comment addressed.	No action.
42	TRCA	May 27 2024 Appendix III	The submitted materials suggest that the path of the watercourse that runs through the property will be altered. We understand that this proposed change would shift the curve of the watercourse towards neighboring properties, potentially creating a new hazard for the adjacent sites. Please revise the grading plan so that the proposed realignment will not impact adjacent properties.	The proposed channel / grading plans demonstrate that the post-development hazards and top of bank plus buffer do not impact any existing properties (not participating in the study area development).	Oct 16 2025	Comment addressed.	No action.
43	TRCA	May 27 2024 Appendix III	The subject lands receive drainage from an external area of 19.4 hectares. However, the proposed grading exercise will obstruct flow from the site. It is crucial that a feature is incorporated to receive flows from this external drainage area.	As per the updated grading and drainage plans, this drainage will not be obstructed and will be conveyed through the subject lands towards the proposed channel corridor.	Oct 16 2025	Comment addressed.	No action.
44	TRCA	May 27 2024 Appendix III	The figure below shows the extent of the floodplain area that is going to be removed from the system. Please quantify the total inundated flood area that is going to be removed.	The LSS test has been revised to compare floodplain area in addition to the volume comparisons.	Oct 16 2025	Comment addressed.	No action.
45	TRCA	May 27 2024 Appendix III	Based on the current model, it is expected that more than 95% of the regional flow will head toward the west. The proposed Highway 413 may pose a challenge as it may obstruct this flow and redirects it towards Mississauga Road. To assess this situation, TRCA staff created a scenario in the 2D model that prevented westward water flow and analyzed the outcomes. The differences in water surface elevations between the existing condition model and the blocked flood flow towards the west are displayed in the XS-A, XS-B, XS-C, XS-D and XS-E cross sections (see below). The shaded area on the second figure shows the increase in water elevation that may be caused due to the implementation of Highway 413. Please run a scenario where spillover flows are brought back to the channel and determine the impact of the flood hazard on site and on adjacent properties.	This approach is no longer being used for definition of the flood hazard and storage downstream of Mississauga Road. The total existing and proposed flows from the catchments upstream of Mississauga Road, assuming no spill, have been assigned at Mississauga Road in the 1D steady and unsteady state models.	Oct 16 2025	Comment addressed.	No action.
46	TRCA	May 27 2024 Appendix III	TRCA staff integrated the proposed fill scenario and blocking flood flow to the west (Highway 413 scenario) under the proposed condition and ran the model to assess the impact. The differences in water surface elevations between the proposed condition model and the blocked flow model towards the west are displayed in the XS-A, XS-B, XS-C, XS-D, and XS-E cross sections (see below). The result of this analysis shows that the flood elevations will be high. Please consider this scenario in the analysis and revise the grading plan which takes into account the blocking of flow from the west.	This approach is no longer being used for definition of the flood hazard and storage downstream of Mississauga Road. The total existing and proposed flows from the catchments upstream of Mississauga Road, assuming no spill, have been assigned at Mississauga Road in the 1D steady and unsteady state models.	Oct 16 2025	Comment addressed.	No action.
47	TRCA	May 27 2024 Appendix III	The figure below compares the inundation boundary scenarios and show that blocking flows to the west will increase flooding on the subject site and neighboring properties. Please consider this scenario in the analysis and revise the grading plan to take into account the blocking flow from the west.	This approach is no longer being used for definition of the flood hazard and storage downstream of Mississauga Road. The total existing and proposed flows from the catchments upstream of Mississauga Road, assuming no spill, have been assigned at Mississauga Road in the 1D steady and unsteady state models.	Oct 16 2025	Comment addressed.	No action.

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48	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	TRCA staff appreciate that the applicant has proposed an enhanced Natural Heritage System designed to accommodate regional storm conditions while also providing for and celebrating extensive greenway corridors. However, the assessment of the impact of the proposed corridor on peak flows and hydraulics has only been undertaken at Node 2167 (Mississauga Road), Node 1125 (Creditview Road), and Node 1105 (Chinguacousy Road), as presented in Table 4-3: Proposed vs. Existing Peak Flows at Key Nodes of the Scoped Servicing Study prepared by Urbantech (August 2025). TRCA staff note that the analysis must also evaluate impacts at all locations with known Flood Vulnerable Areas, including Downtown Brampton.	The downstream analysis has been completed and circulated to Town and TRCA staff for review under separate cover on November 27, 2025. It was confirmed by TRCA on December 11, 2025 that the downstream analysis provided exceeds TRCA's criteria and demonstrates that potential impacts from the proposed development have been effectively mitigated.
49	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	It is noted that the main channel corridor is 135 metres wide immediately west of Creditview Road, while immediately east of Creditview Road it narrows to 63 m (please see the map below). TRCA staff do not support the proposed reduction of the downstream channel corridor from a wider to a narrower section. Narrowing the corridor reduces conveyance capacity and has several adverse hydraulic implications, including increased flow velocities, higher upstream water levels due to backwater effects, greater turbulence and energy losses, elevated shear stresses, and an increased risk of erosion and scour. These changes can destabilize the channel, exacerbate sediment transport and deposition issues, and increase flood risk to upstream lands and adjacent infrastructure. From a management perspective, narrowing the corridor may also result in long-term maintenance challenges, ecological degradation due to loss of floodplain connectivity, and the need for costly engineering interventions to maintain stability. TRCA staff request that the downstream corridor width be maintained to preserve channel function, flood conveyance, and ecological integrity, and to avoid transferring risk and maintenance burden downstream.	The corridor bottom width immediately east of Creditview Road generally contains the meander belt width calculated for this reach, using the TRCA (2004) method and including a factor of safety. As this reach is not a nested channel, the TRCA (2004) method was found to be the most appropriate approach. A short section of the erosion hazard extends beyond to toe of slope. However, all meander belt width calculations are based on channels where instream energy is greater than the potential resistance of the bank materials. As such, they over predict the potential extent of meandering of vegetation-controlled channels and the erosion hazard. Given the low-gradient, scale, and the anticipated vegetation control of the designed channel, the calculated meander belt width appropriately accommodates potential lateral channel movement. Additionally, the proposed meander belt widths will be further refined at detailed design. To further mitigate concerns relating to erosion from channel migration, bank protection has been added to meander bends near the corridor toe in this reach particularly near the hold-out properties.
49a	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025		
50	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	The Scoped Servicing Study prepared by Urbantech (August 2025), Section 3.2, states that "TRCA updated the 2013 Etobicoke Creek Hydrology model in 2022 and provided the calibrated Visual OTTHYMO model for the study area to the Alloa study team (Urbantech Consulting) in 2024." TRCA staff clarify that the Etobicoke Creek Hydrology model was not updated in 2022. TRCA's latest calibrated Visual OTTHYMO model is the 2013 Etobicoke Creek Hydrology model. Please revise this statement accordingly.	Noted; this correction will be made to subsequent submissions.
51	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	It is essential that all eight-stormwater management quantity control facilities within the Etobicoke Creek Watershed be designed to ensure positive drainage to the receiving system for all storm events, ranging from the 2-year to the 100-year return period. This is necessary to prevent prolonged ponding, ensure system functionality under a range of design storms, and maintain safe and effective downstream flow conveyance.	Acknowledged; all drainage systems / facilities will ultimately drain to the NHS.
52	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Please include a subsection under Section 4.2.3 of the Scoped Servicing Study that addresses the following: a) Assessment of runoff volumes for the entire drainage area, including flows conveyed via the tributary crossing Mississauga Road. b) Discussion and analysis of flood spill volumes leaving the watershed west of the boundary toward the neighbouring Conservation Authority under Regional storm conditions, including the potential redirecting of flood spill flows to the east of the Alloa channel and the implications for additional flood volumes in the system. c) Analysis of variations in storage under both a real Regional storm hydrograph and a quasi-hydrograph, to illustrate storage dynamics and estimate the runoff volumes introduced to the system under these two input conditions. d) Quantification of flood storage loss associated with the Highway 413 corridor footprint. e) Cut-and-fill analysis conducted within the study area. f) A detailed breakdown of cut-and-fill volumes for the portion of the study area west of Mississauga Road, including the impacts of Highway 413.	The requested calculations have been completed and are included in Section 4 of the Scoped Servicing Study (Appendix K of the LSS).
53	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Please note that once all remaining floodplain related comments have been satisfactorily addressed, TRCA requires the applicant to submit the proposed floodplain mapping prepared in full accordance with TRCA's Floodplain Mapping Standards. The submission must include all supporting technical documentation, model outputs, and mapping deliverables necessary to demonstrate compliance with TRCA requirements and to ensure that the proposed mapping can be accepted as the regulatory floodplain delineation.	Acknowledged

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54	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	The title of Figure 12 from the LSS has changed from Potentiometric Groundwater Location to Interpreted Groundwater Surface & Flow Direction in the July 2025 submission. Please clarify whether a different methodology was used to prepare the revised contour map.	A different methodology was not used to prepare the revised contour map. Naming was adjusted due to the creation of an additional map (Figure 15) which outlines the potentiometric surface across the Study Area.
55	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	The revised figure includes groundwater contours but omits groundwater elevations recorded at monitoring well locations. Please clarify why this data was removed. Please include the date of measurement used to generate the map. Additionally, the groundwater divide shown in the first submission has been removed. Please explain the rationale for this change.	Data included was vetted for suitability of inclusion in analysis. Areas where unrepresentative conditions were observed were removed (i.e. pressurized levels from deeper aquifers). Date(s) used in the map were from Spring 2024. Groundwater divide has been provided within Figure 12.
56	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 7.1.7 (Page 35) of the LSS: The phrase "if necessary" has been added regarding future infiltration tests. Please remove "if necessary."	Addressed in Section 7.1.8.
57	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Recharge and Discharge (Page 45) of the LSS: Staff see changes to the text provided in the first submission. For example, groundwater level responses in monitoring wells to precipitation events were removed. (First Submission LSS, Page 55 of 906). Also, a reference to the requirement of additional investigation being conducted was removed. Please clarify why these changes were made.	Changes were made to address comments and remain within the outlined scope of the TOR.
58	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Alloa Drain section (Page 52) of the LSS: Tile drainage contributions to the Alloa Drain are recognized but not quantified. Please provide an assessment of changes to the water budget and the drain flows once tile drainage is removed in post-development. Note that the Alloa Drain may also receive groundwater contributions from confining units within the till. Vertical fractures within the Halton Till, extending up to 5 m and in some cases to bedrock, are well-documented and may act as conduits for groundwater seepage.	Quantification of the historical tile drains to the Alloa Drain are outside the scope of the hydrogeological works and not feasible based on the lack of records and known extents of tile drainage. Furthermore, the surface and groundwater flows pre- to post-development within catchments that include tile drains will not be affected as all modelling works under the assumption that water will migrate to receiving features either through surface runoff or interflow. Therefore no changes to the water balance models are required.
59	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Additional details are required regarding the proposed realignment elevation of the Alloa Drain. Section 7.2.2 of the LSS indicates that the confining layer extends to 255.5 masl. Please provide a geologic cross-section along the drain showing current and proposed elevations. The response states that no impacts are expected as the proposed realignment does not extend below 256 masl. Please provide further justification for this conclusion.	Acknowledged. Please refer to revised wording in Section 7.1.8 and 18.1.1. Similarly, please refer to the Scoped Servicing Study (Urbantech, 2025) presented in Appendix I of this report. Specifically, please refer to the following drawings in Appendix K which illustrate the proposed Alloa Drain and NHS elevations in relation to the confining layer elevation of 255.5 masl: - Dwg 2B - Preliminary Grading Plan - Dwg 4A - Proposed NHS System and Trail Map (includes locations of cross-sections along the proposed Alloa Drain) - Dwg 4B - Proposed Alloa Drain Realignment Vertical Profile (illustrates existing vs proposed drain invert and associated elevations) - Dwg 4C-4D - Preliminary Creek Realignment Vertical Profile - Dwg 4E-4I - NHS Cross Sections (illustrates proposed Alloa Drain sections and associated elevations) Further sections and detail along the Alloa Drain re-alignment will be provided at the EIR/FSR stage. The current information confirms that the proposed realignment does not extend below the 256 masl therefore the confining layer shall remain intact post realignment construction. In the event that a confining layer elevational anomaly is encountered, mitigation in the form of clay lining will be employed. This commentary has been provided within Sections noted above.
60	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Appendix C of the LSS does not include borehole logs for all monitoring wells referenced in the report. Please include borehole logs for all wells. Hydrographs for P22, P23, and P25 are also missing and should be added.	All borehole logs have been included in Appendix C . Hydrograph for P22 has been included. P23 and P25 do not have loggers. Reasoning is included in Section 7.1.6.3 "Site Wide Wetland Monitoring Network"
61	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	The first submission (Page 48) of the LSS identified additional monitoring requirements for Wetland 3. However, this has been removed in the current submission (Page 51). Please clarify why this requirement was eliminated.	The version of the report submitted now includes recommendations for additional site specific monitoring. Additional monitoring for Wetland 3 is not required at this stage.
62	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 7.1.7 (Page 45) of the LSS acknowledges spring inundation for Wetlands 1-6 but not Wetland 7. Table 11 identifies groundwater input with long residence time for Wetland 7. Please ensure Wetland 7 is also included in the text.	Addressed. Additional verbiage has been added under Section 7.2.1.1: Alloa Drain which speaks to Wetland 7.
63	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 18.1.1 (Page 262) of the LSS: This section evaluates the feasibility of LID features in catchments of Wetlands 1-7. Except for Wetlands 4 and 6, the review indicates uncertainty regarding groundwater infiltration due to uncertain separation between LID inverts and the highest groundwater level. At this stage, assurances are needed that infiltration will be feasible in the areas designated for this purpose.	Infiltration will be feasible where separation between LIDs and groundwater table can be achieved. Reported groundwater levels reference existing grade and not the final state of the site which will need to be considered in the EIR and related studies to support Tertiary Planning and Draft Plans of Subdivision.

RESPONSE MATRIX TO SECOND SUBMISSION (August 2025) COMMENTS - SCOPED TO SUBWATERSHED STUDY COMMENTS ONLY
Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)

#	REVIEWER	DATE RECEIVED (1)	REVIEWER COMMENTS (1)	FORMAL RESPONSE (1)	DATE RECEIVED (2)	REVIEWER COMMENTS (2)	FORMAL RESPONSE (2)
64	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Further to the above, please clearly indicate whether identified mitigation measures are feasible or not for each wetland. The section that discusses groundwater and surface water monitoring (pg. 265) during and post construction should include targets and proposed mitigation measures in the event these targets are reached, and should avoid phrases such as "if a significant change is noted" ... as it is unclear as to what a significant change would be.	Discussion of whether identified mitigation measures are feasible or not for each wetland has been included in Section 18.1.2. Targets have been included in "Construction" and "Post-Construction" sections of "Groundwater Protection Construction Strategies" in Section 18.1.1. Targets include maintaining the existing hydroperiod through adaptive management options. Mitigative measures in the event that these targets are not maintained will be included in a post-implementation monitoring plan, as stated in Section 18.1.1.
65	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 3.6.3 of the Scoped Servicing Study and 11.2.1 of the LSS needs to confirm how wetland water balance is to be achieved for each wetland, particularly given the high groundwater table. Please provide a conceptual plan which identifies which wetlands are groundwater fed and which are purely surface water fed.	The pre and post-development wetland drainage areas plans are provided on Drawings 3F and 3G , respectively, as included with the LSS. The sensitivity analysis memo in Appendix C of the Scoped Servicing Study (Appendix K of the LSS) provides the wetland water balance on a monthly runoff volume perspective.
66	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 11.2.1 of the LSS should also include a map of the wetland catchments and the proposed development within the catchments for clarity. In addition, please also include the Wetland Water Balance Risk Evaluation for review and the summary is unclear how the risk factors have been identified as low. It would be beneficial to have the pre and post development hydrographs plotted and included in this section to clearly illustrate potential changes in wetland hydrology.	The pre- and post-development wetland drainage areas are included on Drawings 3F and 3G of the Scoped Servicing Study in Appendix K of the LSS. The wetland water balance risk assessment was completed following TRCA guidelines as provided in the most recently published document. Risk factor assignment has been better presented to ensure that reviewers/readers are able to follow the calculated catchment areas and scoring factors.
67	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 16.2 of the LSS should be revised to clarify that only clean stormwater from rooftops or grassed areas should be used to feed wetlands. If water from SWM ponds is used, salt, oil, grease and suspended sediments could affect water balance and infiltration.	Addressed: text has been added to Section 16.2 to include a clarification about clean water inputs to wetlands.
68	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 3.7 of the Scoped Servicing Study and Section 18.2.4 (page 274 in particular) of the LSS should be updated to include the need for erosion controls. Further, TRCA's ESC Guideline for Urban Construction, 2019 should be referenced.	Section 3.7 of the Scoped Servicing Study (provided in Appendix K of the LSS) has been updated to reference TRCA's 2019 ESC Guidelines.
69	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 3.5 of the LSS should include reference to Appendix E of TRCA's SWM Criteria Document, 2012, particularly as it relates to SWM pond outlet design.	Section 3.5.2 of the Scoped Servicing Study (provided in Appendix K of the LSS) has been updated to reference Appendix E of TRCA's 2012 SWM Guidelines with respect to the detailed design of the SWM pond outlets.
70	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Section 10.4.2 of the LSS should include reference to TRCA's Crossing Guidelines, 2015, particularly as it relates to proposed crossings of the natural channel corridor.	Section 4.2.3 of the Scoped Servicing Study (Appendix K of the LSS) describes the future requirements for the crossing design.
71	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Further to the above, it is understood that several culvert crossings as well as a long span bridge is proposed along the natural channel corridor. A geotechnical study should be completed to support the design and construction of the proposed culvert crossings and long span pedestrian bridge over the proposed natural channel corridor and provide geotechnical design recommendations. It is noted that while this work can take place at as part of the Tertiary Planning process for each phase (FSR component), the requirement to conduct the above noted work should be integrated into the Scoped Servicing Study/LSS, as required.	Section 4.2.3 of the Scoped Servicing Study (Appendix K of the LSS) describes the future requirements for the crossing design.
72	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	The Preliminary Grading Plan and associated cross-sections depict SWM pond berms adjacent to the natural channel corridor that are greater than 2 m in height. Geotechnical recommendations will need to be provided to support the design and construction of the SWM pond berms, to ensure that the berms are constructed of suitable, low permeable material and designed to act as suitable SWM pond berms that will not be negatively impacted due to seepage. A geotechnical review of the SWM pond berms will also need to be completed to ensure they are designed to the level acceptable for dams and meet the requirements/geotechnical factors of safety as per the Lake and River Improvement Act (LRIA) technical guidelines. It is noted that while this work can take place at as part of the Tertiary Planning process for each phase (FSR component), the requirement to conduct the above noted work should be integrated into the Scoped Servicing Study/LSS, as required.	Section 2.1 of the Scoped Servicing Study (provided in Appendix K of the LSS) has been updated to reference the geotechnical review requirements, which are to be completed at the detailed design stage.
73	TRCA	Oct 16 2025	N/A	N/A	Oct 16 2025	Per the Scoped Servicing Study, in Figure 4I under Appendix A, Cross-section H-H shows a berm proposed at the interface of the NHS corridor and the Future MTO SWM pond. The applicant is asked to confirm that MTO will permit the berm in this location.	The proposed drawings will be coordinated with MTO through the Draft Plan process.

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CVC							
1	CVC	Oct 10 2024	We note that in reviewing the local LSS, there is an omission of discussion around the wetland loss and expected offsetting at 1850 Mayfield Road. The land use plan (Figure 21) does not show the replicated wetland and only shows a SWM block. It is expected that this is revised accordingly and further that the LSS contains a section that speaks to the removal and offsetting requirements for this site (in accordance with the attached CVC comments for PARC 2024-0190/0131) as committed to by the applicant (Crozier letter to CVC, March 25, 2024).	Due to the high level detail of the Land Use Plan (Figure 20), the offsetting at 1850 Mayfield Road is not illustrated to any level of detail. Details of the offsetting and justification were provided to the CVC and was approved (Dorothy DiBerto, May 13, 2025). It was agreed that the implementation of the agreed compensation would be made a condition of Draft Plan Approval.	N/A	N/A	N/A
2	CVC	Oct 10 2024	The local LSS should also be generally consistent with the proposed NHS for the Peel Settlement Boundary Study Area (SABE) and it is advised that the applicant reference that study for conformity.	The Local LSS uses field inventory to refine and update NHS limits as estimated by the various agencies, including the SABE. The NHS limits should be based on field findings and not estimates such as the SABE. The SABE is referenced in the LSS as a resource document.	N/A	N/A	N/A
3	CVC	Oct 10 2024	In regards to stormwater management below are CVC engineering comments: 1. The quantity control and erosion control target release rate and target storage requirements as identified in Table 52, 55, and 56 of LSS Phase 3 for future SWM facilities tributary to West Huttonville Creek are consistent with the latest version of Phase 2 of Heritage Heights Subwatershed study (March 2022), that is being revised/updated as mentioned in current submission. The erosion control and quantity control targets for West Huttonville Creek subwatershed will be revisited at EIR stage to confirm these targets at EIR stage. Please update the Section 17.3.1 and 17.3.2 and the Scoped Servicing Study accordingly.	The LSS has been updated to indicate that the erosion control and quantity control targets for the West Huttonville Creek subwatershed are to be revisited/confirmed at the EIR/FSR stage. This will be subject to the updated HHLSS being available and complete at the time of the EIR submission.	N/A	N/A	N/A
4	CVC	Oct 10 2024	2. The approved Mount Pleasant Subwatershed Study (HFLSS) identifies quantity and erosion control targets at flow nodes and identifies the target storage and release rates for erosion control and 2 to 100-year storm events, however, it does not provide target discharge rate for SWM Ponds during Regional storm event. According to the "EIR Requirements" identified in HFLSS Phase 3 report (Phase 3: Management Strategies and Implementation Plan, Subwatershed Study for The Huttonville and Fletcher's Creeks, North West Brampton, Section 3.3.1), verification of post to pre-development flow at target flow nodes and verification of critical flow durations meeting existing durations at target flow nodes will be required using the HFLSS subwatershed study HSP-F hydrologic model. Please update 17.3.1 and 17.3.2 of the LSS Phase 3 report and the Scoped Servicing Study to reflect these requirements.	This will be done through the Phase 1 Tertiary Plan FSR	N/A	N/A	N/A
5	CVC	Oct 10 2024	3. Section 18.1.2. Stormwater Management (LSS Phase 3) indicates "Urbantech Drawing 2.4 (See Figure 29) shows multiple employment blocks in the southwest corner of the subject area, which drain to flow node H3 in the East Huttonville Creek, and flow node F2 in Fletcher's Creek". However, according to URBANTECH Drawing 2.4 (Figure 29) and Section 2.3 of the submitted Scoped Servicing Study, some of these employment blocks drain to Flow Node HW. Please update section 18.1.2 of LSS consistent with the submitted Scoped Servicing Study (Urbantech, July 2024).	Section 18.1.2 of the LSS has been updated to be consistent with the Scoped Servicing Study regarding some of the employment blocks draining to Flow Node HW.	N/A	N/A	N/A
6	CVC	Oct 10 2024	4. Assessing the capacity of the conveyance downstream of the proposed SWM facilities, including safe conveyance of emergency overflow will be reviewed at EIR stage. Please update LSS Phase 3 report the Scoped Servicing Study accordingly.	The LSS has been updated to indicate that capacity downstream of the proposed SWM facilities, including emergency overflow, is to be assessed at the EIR/FSR stage.	N/A	N/A	N/A

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7	CVC	Oct 10 2024	5. Private on-site SWM facilities are proposed for employment blocks in the southwest corner of the subject area and for blocks of medium and high-rise development adjacent to Chinguacousy Road. Based on Table 56 and the Scoped Servicing Study, all these facilities are required to provide Regional control. Note that CVC do not support the provision of Regional control using SWM quantity control facilities in private ownership and it is our understanding that MECP requires individual ECA for SWM facilities in private ownership. Please consult with MECP and Town of Caledon for their requirements for Regional control facilities in private ownership, and update LSS Phase 3 report and the Scoped Servicing Study accordingly.	<p>We understand that CVC does not support private / on-site Regional controls. However, the Secondary Plan’s employment lands along Mayfield Road preclude large public facilities typically used to meet the Regional volume requirements. Each block must drain to discrete outlets provided on Mayfield Road to convey drainage to channels, wetlands and facilities downstream. There is no practical way to consolidate runoff into shared ponds or larger detention areas due to grading constraints, and traditional, public wet-pond blocks are not feasible or practical for these small parcels.</p> <p>Therefore, the quantity control requirements for each individual private site plan block along Mayfield Road will follow a hierarchy of evaluation as described in the LSS:</p> <p>1. Available Outlet Pipe / Culvert Capacity – Verify that the existing Mayfield Road sewers / culvert crossings (with no upgrades assumed) can convey the controlled 100-year peak. If it can, the block simply adheres to HFLSS unit rates for the 2-year to 100-year events. If not, the allowable release rate must be reduced to match the pipe capacity, and additional on-site storage solutions (e.g., underground tanks, pipe storage, rooftop storage, surface storage, etc. to ensure the 100-year peak never exceeds downstream capacity.</p> <p>2. Meet the HFLSS Unit rates and release Uncontrolled Regional Flows – If outlet capacity is not limited, and where a conventional detention facility remains impractical, it is possible that post-development Regional peak flow is only marginally higher than the existing Regional flow. In this case, a “no-impact” analysis should be completed to demonstrate that releasing the uncontrolled Regional flows does impact downstream water levels / infrastructure beyond acceptable thresholds (to be determined with the CVC). This would involve evaluating the downstream storm sewers, culverts/channels (HEC-RAS analysis) and overall hydrology (HFLSS HSP-F model). This approach was previously accepted by CVC for small areas in which meeting the Regional storage criteria was impractical and absence of the Regional volume had no effect downstream (e.g., Block 51-3, Daniels high density site south of CNR, Mattamy Feedmill site).</p> <p>3. HFLSS Unit Rate Targets (2- to 100-Year and Regional) – Design controls to meet these prescribed release rates if existing infrastructure does not limit the allowable release rate, and the Town and CVC should accept private on-site Regional facilities. Note that HFLSS does not specify a private Regional peak control target—only an overall volume target (m3/imp ha).</p> <p>The individual requirements for each block will be determined at the Tertiary Plan / FSR stage and refined through detailed design.</p>	Nov 18 2025	<p>Not addressed.</p> <p>CVC supports hierarchy option 1 and option 2 but not option 3. It is expected that option 1 and option 2 can address the flood hazard. CVC does not support Regional control stormwater facilities with no municipal oversight, which is consistent with the MNR Technical Guideline- River and Stream Systems (2002) and CVCs Stormwater Management Guideline (2022).</p> <p>Additional comments may be provided upon review of the response and the revised report.</p>	<p>Per comments received from CVC (November 18, 2025), the quantity control hierarchy for the private site plan blocks along Mayfield Road was revised to the following:</p> <p>1. Available Outlet Pipe / Culvert Capacity – Verify that the existing Mayfield Road sewers / culvert crossings (with no upgrades assumed) can convey the controlled 100-year peak. If it can, the block simply adheres to HFLSS unit rates for the 2-year to 100-year events. If not, the allowable release rate must be reduced to match the pipe capacity, and additional on-site storage solutions (e.g., underground tanks, pipe storage, rooftop storage, surface storage, etc. to ensure the 100-year peak never exceeds downstream capacity.</p> <p>2. Meet the HFLSS Unit rates and release Uncontrolled Regional Flows – If outlet capacity is not limited, and where a conventional detention facility remains impractical, it is possible that post-development Regional peak flow is only marginally higher than the existing Regional flow. In this case, a “no-impact” analysis should be completed to demonstrate that releasing the uncontrolled Regional flows does impact downstream water levels / infrastructure beyond acceptable thresholds (to be determined with the CVC). This would involve evaluating the downstream storm sewers, culverts/channels (HEC-RAS analysis) and overall hydrology (HFLSS HSP-F model). This approach was previously accepted by CVC for small areas in which meeting the Regional storage criteria was impractical and absence of the Regional volume had no effect downstream (e.g., Block 51-3, Daniels high density site south of CNR, Mattamy Feedmill site).</p> <p>The individual requirements for each private site plan block will be determined at the Tertiary Plan / FSR stage and refined through detailed design.</p> <p>This has been updated in Section 3.5.3 of the Scoped Servicing Study (provided in Appendix K of the LSS).</p>
8	CVC	Nov 18 2025	N/A	N/A	Nov 18 2025	<p>Regarding the possible wetland around FC-1B, please confirm whether that area is wetland or not. A CVC permit may be required and in order to obtain a CVC permit, a plan for offsetting may need to be created and incorporated into the larger planning framework.</p> <p>Additional comments may be provided upon review of the next submission and through the review of associated files (such as the Phase 1 Tertiary Plan, FSR, detail design stage, etc.).</p>	<p>The letter prepared by GEO Morphix (dated May 30, 2025) regarding the FC-1 drainage feature noted that a wetland is not present along Reach FC-1B.</p> <p>Based on site conditions observed on June 5 and June 13, 2024, and the agricultural lands tillage history, the reed-cannary-grass-graminoid marsh meadow (MAMM1-3) does not qualify by MNR (2022) definition as wetland.</p>

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Additional Town Commentary							
1	Water Resources (Cassie Schembri)	March 6 2025	Water Resources Engineering has completed a preliminary review of the following documents submitted by the Alloa Landowners Group: • Draft Terms of Reference (TOR, October 2024) • Local Subwatershed Study for the Alloa Secondary Plan Area & Associated Subcatchments (C.F. Crozier & Associates Inc., 1st Submission, July 2024) • Phase 1 Tertiary Plan Functional Servicing Report Prepared For: Alloa Phase 1 Landowners Group Inc. (Urbantech Consulting, A Division of Leighton-Zec Ltd., September 2024) • Secondary Plan Scoped Servicing Study Alloa Caledon Secondary Plan Town of Caledon, Prepared for Alloa Landowners Group Inc. (Urbantech Consulting, July 2024)	N/A	N/A	N/A	N/A
2	Water Resources (Cassie Schembri)	March 3 2025	In support of the Town's review, Montrose Environmental SERVICES (Canada) (MES) and its subconsultants, Scheckenberger & Associates and HDR, were retained to provide peer review services of the Local Subwatershed Study (LSS) and the Phase 1 Tertiary Plan Functional Servicing Report (FSR) prepared for the Alloa Secondary Plan area in the Town of Caledon (Town) by the Alloa Landowner Group. On February 18, 2025, representatives from the Town's Engineering and Natural Heritage team, the Town's peer review team, the Alloa consulting team and Landowners Group met to discuss the Local Subwatershed Study (LSS) and Functional Services Report (FSR). It was agreed to at that meeting that the Alloa consultant team would update the LSS document to present and integrate all work completed with the intent of providing a fulsome LSS report, and to fulfill commitments reflected in the LSS Terms of Reference (October 2024). In support of this new direction, the Town and its peer review team have paused our current review of the LSS and are providing preliminary comments that have been prepared to date based. Given that the LSS review was halted during the review process in order to allow for a more fulsome submission of the LSS, the comments provided herein by the Town and the peer review team do not constitute a comprehensive, complete and integrated documentation of all gaps and deficiencies. The comments herein are provided with the intent of providing guidance to the Alloa consulting team to support their update of the LSS and to ensure the subsequent submission of the LSS aligns with the complete requirements of an LSS. The lack of comments on any content does not indicate that commitments made within the TOR have been fulfilled, nor that content within the current LSS is considered complete.	N/A	N/A	N/A	N/A
3	Water Resources (Cassie Schembri)	March 3 2025	The following comments are provided on the Terms of Reference for the Alloa Local Subwatershed Study (Alloa Landowners Group, October, 2024): 1. It is Engineering's understanding that both TRCA and CVC's comments have been addressed and both organizations have indicated approval of the October 2024 Terms of Reference. There continues to be comments provided by the Town's Natural Heritage Planner (Jason Elliott) on the second and third submission of the Terms of Reference that have not been resolved. The Town expects that the natural heritage comments will be addressed through the Local Subwatershed Study to the satisfaction of the Town. Furthermore, in light of the applicant's desire to submit the full Local Subwatershed Study inclusive of all three phases, the Local Subwatershed Study Terms of Reference may need to be amended and scope potentially changed should the findings of the various phases warrant additional work. With this in mind, Engineering Services has no further comments at this time and supports the Terms of Reference dated October 2024.	Acknowledged	N/A	N/A	N/A
4	Water Resources (Cassie Schembri)	March 3 2025	The following comments are provided on the Local Subwatershed Study for the Alloa Secondary Plan Area & Associated Subcatchments (C.F. Crozier & Associates Inc., 1st Submission, July 2024) and Phase 1 Tertiary Plan Functional Servicing Report Prepared For: Alloa Phase 1 Landowners Group Inc. (Urbantech Consulting, A Division of Leighton-Zec Ltd., September 2024): 2. As noted above, the Town procured the peer review services of Montrose Environmental SERVICES (Canada) (MES) and its subconsultants, Scheckenberger & Associates and HDR. The preliminary comments provided on the LSS and the Phase 1 Tertiary Plan are provided in Appendix A (see below comments under Montrose). It is the Town's expectation that all comments provided in Appendix A are addressed in the second submission of the LSS. As agreed to on February 18, 2025, the Town and our peer review consultants can meet to discuss the comments should the applicant determine it to be helpful.	Acknowledged	N/A	N/A	N/A

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5	Water Resources (Casie Schembri)	Mar 3 2025	3. As noted above, the Town met with representatives from the Town's Engineering and Natural Heritage team, the Town's peer review team, the Alloa consulting team and Landowners Group to discuss the Local Subwatershed Study (LSS) and Functional Services Report (FSR). From that meeting it was agreed that preliminary comments would be provided and that the Alloa Landowner Group would submit an updated Local Subwatershed Study. A summary of the meeting is provided in Appendix B (<i>refer to original comment document</i>). It is the Town's expectation that the comments provided herein and any requirements of outlined in the LSS TOR will be addressed in the second submission of the LSS.	Acknowledged	N/A	N/A	N/A
a	Montrose Environmental	Mar 3 2025	Montrose Environmental Solutions Canada Inc. (Montrose) and its subconsultants (Review Team), were retained to provide peer review services of the Local Subwatershed Study (LSS) and Functional Servicing Report (FSR) prepared by landowner groups (LOG) for the ALLOA Secondary Plan area in the Town of Caledon (Town). With respect to the Alloa Secondary Plan Area, Montrose received the following documents that had been submitted to the Town by Crozier & Associates, the study team lead for the LOG: <ul style="list-style-type: none">• Draft Terms of Reference (TOR, October 2024)• Local Subwatershed Study (LSS, July 2024)• Functional Servicing Report (FSR, October 2024)	Acknowledged	N/A	N/A	N/A
b	Montrose Environmental	Mar 3 2025	<p>In recent meetings (February 10 and 18, 2025) held between the Town and the Landowner Group's consultant team, and attended by the Montrose Review Team, background context was received regarding the July 2024 LSS report and the additional work that had been completed and presented in subsequent reports (e.g., the FSR and Environmental Implementation Report). Through these meetings, it was confirmed that the LSS (July 2024) had been compiled under pressing timelines, acknowledged to be incomplete, and did not fully satisfy the commitments represented in the TOR. This report status was consistent with the observations made by the Montrose Review Team.</p> <p>In the February 18, 2025, meeting between the Town and Alloa consultant team, the Alloa consultant team agreed to update the LSS document; the intent of the LSS update is to present and integrate all work completed for a fulsome LSS report, and to fulfill commitments reflected in the TOR (October 2024) that had been agreed upon with the Town. In support of this new direction, the Review Team was asked to pause the current review process of the LSS and to submit any comments that had been prepared to the Town. Given that the LSS review process was halted during the review process, and that the LSS was substantially incomplete, the comments do not provide a comprehensive, complete and integrated documentation of all gaps and deficiencies. Instead, the comments include both high level and specific comments regarding LSS report completeness and content to guide the subsequent re-submission by the ALLOA consultant Team. The lack of comments on any content does not indicate that commitments made within the TOR have been fulfilled, nor that content within the current LSS is considered complete.</p> <p>Upon review of the comments, as suggested in the February 18, 2025, meeting, focused workshops could be held to discuss comments and report content, in order to support LSS completion resubmission. The comments that are attached to this letter follow the LSS report table of contents and are respectfully submitted. The Montrose Review team is currently in the process of also compiling high level FSR comments and will provide high level EIR comments, once that scope of work is confirmed. We look forward to reviewing updated submissions of the reports.</p>	Acknowledged	N/A	N/A	N/A
Region of Peel							
1	Region of Peel	Oct 10 2024	Alloa Subwatershed Study The following items are required at the secondary plan stage: <ul style="list-style-type: none">• Site and Feature-based water balance. Proponent will need to coordinate with local Conservation Authority.	Acknowledged. Site and FBWB have been updated based on the latest information. Please refer to Sections 7.2, 7.3, 11.2, 17.2, and 18.1 for details. Discussions with the CA have commenced and are ongoing. Crozier has been collecting continuous groundwater and surface water data at select locations and have installed a weather station that is collecting site specific meteorological data to ensure that the results of the water balances are reflective of actual conditions at the site.	N/A	N/A	N/A

RESPONSE MATRIX TO SECOND SUBMISSION (August 2025) COMMENTS - SCOPED TO SUBWATERSHED STUDY COMMENTS ONLY
Alloa Secondary Plan - POPA 2024-0004 (Responses dated January 2026)

#	REVIEWER	DATE RECEIVED (1)	REVIEWER COMMENTS (1)	FORMAL RESPONSE (1)	DATE RECEIVED (2)	REVIEWER COMMENTS (2)	FORMAL RESPONSE (2)
2	Region of Peel	Oct 10 2024	<p>The following items remain unaddressed and are to be submitted through the future Draft Plan of Subdivision and Site Plan applications:</p> <ul style="list-style-type: none">• The report did not contain a well survey and contingency plan for potential impacts to private wells. This item could be addressed later in the planning process.• Copy of permit to discharge from utility authority (if applicable, i.e. discharge directed towards municipal sewer) when available.• Copy of the dewatering discharge plan submitted to conservation authority (i.e. discharge directed towards NHS) when available	<ul style="list-style-type: none">• Crozier agrees that the result of a well survey, as well as a contingency plan for potential impacts to private wells will be necessary through future Draft Plan of Subdivision and Site Plan applications. The well survey will capture all drinking water wells within and area of 500 - 1000m from the site boundary and the information collected will include age of well, type of well, water level and potentially the collection of a water sample for submission to an accredited laboratory for analysis for general chemical, metals & inorganics and bacteriological parameters.• If required, discharge permits will be obtained from utility authorities and copies will be forwarded to the Region of Peel. It is premature to apply for discharge permits at this time, this requirement will be addressed at a later stage in the planning process. As the Town has acknowledged that this is a requirement for later stages of the planning process, including this as a comment at this time does not represent an efficient use of Region resources• Similarly, copies of any dewatering discharge plans that have been submitted to the CA will be forwarded to the Region of Peel. As the Region has acknowledged that this is a requirement for later stages of the planning process, including this as a comment at this time does not represent an efficient use of Region resources	N/A	N/A	N/A