

SEPTEMBER 9, 2026

PROJECT NO: 2996-7616

SENT VIA: EMAIL
MFARNCOMBE@PUSLINCH.CA

County of Wellington
74 Woolwich Street
Guelph, Ontario N1H 3T9

Attention: Meagan Ferris, Manager of Planning and Environment

**RE: REGION OF WATERLOO HYDROGEOLOGY AND SOURCE WATER PROTECTION
COMMENTS FOR OFFICIAL PLAN AMENDMENT APPLICATION
2781-2809 TOWNLINE ROAD
PUSLINCH, ONTARIO**

Dear Ms. Ferris,

This letter has been prepared in response to the following comments received from the Region of Waterloo in a letter dated August 10, 2026, regarding the Official Plan Amendment Application for 2781-2809 Townline Road in Puslinch Ontario (Site):

Hydrogeology and Source Water Protection Comment:

Regional Staff have reviewed the submitted Hydrogeological Study authored by Soil Engineers Ltd. (November 2025) and consider the assessment insufficient to demonstrate that the proposing private water taking, services, and stormwater management approach will maintain groundwater quality and quantity and will not adversely affect nearby water users, including municipal drinking water supply wells.

The subject property is located approximately 1km from a Regional municipal drinking water supply wells and is within Wellhead Protection Areas. The Region requires a comprehensive Hydrogeological Assessment, including a detailed water balance, that evaluates the potential impacts of the proposed development on groundwater quality and quantity. At a minimum, the assessment should address:

- i. Potential impacts of the proposed private groundwater taking on nearby water users, including the Region's municipal supply wells;**
- ii. Cumulative impacts associated with existing and proposed groundwater takings in the surrounding area;**
- iii. Changes to groundwater flow, groundwater levels, groundwater recharge and groundwater discharge resulting from the proposed development;**
- iv. The potential or the proposed private septic system to affect groundwater quality (and cumulative impacts with surrounding private septic systems), including the potential migration of contaminants through groundwater recharge pathways;**

- v. The proposed stormwater management approach and its potential effects on groundwater recharge and groundwater quality (i.e. water balance and chloride impact assessment). Note, the Region does not support the infiltration of chloride laden runoff into the ground; and**
- vi. Appropriate mitigation measures and a groundwater monitoring program to demonstrate that the development will not adversely affect groundwater quality or quantity.**

The Hydrogeological Assessment should include sufficient baseline groundwater monitoring (shallow and deep locations) and site-specific data to establish existing groundwater conditions and support an assessment of potential impacts from the proposed development. Where impacts cannot be adequately based on existing information, additional monitoring, testing or analysis should be undertaken (i.e. pumping test and groundwater evaluation at a test well for the proposed water taking). The monitoring program should continue for an appropriate period to confirm that the development is not adversely affecting groundwater quality or quantity, including the nearby Regional municipal drinking water supply.

Regional Staff require circulation on the revised Hydrogeological Assessment and any subsequent technical submissions related to groundwater (i.e. Stormwater Management Report/Water Balance) and all groundwater monitoring reports.

Response to Comment:

We (Crozier) would like to preface our response to the Region's Hydrogeology and Source Water Protection comments by noting that Crozier has been retained to assist the client with the private servicing aspects of this site and has prepared and submitted a Private Servicing Assessment to the relevant agencies for circulation. Soil Engineers Ltd. completed the Hydrogeological Report that has been reviewed but did not include the water taking and sanitary aspects of the Site. Due to our extensive experience working with the Ministry of the Environment, Conservation and Parks (MECP) on approvals for water and wastewater servicing, the responses provided herein have been prepared at the request of the client to address the Region's comments accordingly.

Crozier notes that the Site is not located within the Region of Waterloo, however we understand that the Region will be commenting on the development application in accordance with the Planning Act. As the proposed servicing strategy will consist of private water supply and sanitary servicing, both the proposed water taking and sewage discharge will occur outside of the Region's municipal boundary. We acknowledge the Region's interest in ensuring that the proposed development does not adversely impact groundwater quantity or quality, particularly given the Site's proximity to regional municipal drinking water supply wells. It is our understanding that the Township of Puslinch will be primarily responsible for the review of the development application which has requirements for an appropriate Hydrogeological Assessment, which mirror many of the requirements of the Region of Waterloo. Ultimately, a hydrogeological report must be produced that satisfies both the Township of Puslinch and MECP, with the review and approval of the proposed water taking and sewage works ultimately being completed by the MECP (via a Permit to Take Water and Environmental Compliance Approval, respectively).

As part of the Permit to Take Water process, the MECP will review the hydrogeological assessment and consider the potential impacts of the proposed water taking on surrounding groundwater users, including nearby municipal wells. Similarly, the potential impacts of the proposed sewage works on groundwater quality and surrounding groundwater users will be

assessed through the Groundwater Resources Impact Assessment required to support a future Environmental Compliance Approval. Given that the ultimate review and approval will be completed by the MECP (provincial authority) and will consider potential impacts regardless of municipal boundaries, we believe this should address the Region's concerns.

- i. These potential impacts will be assessed as part of the hydrogeological assessment to support a future Permit to Take Water application with the MECP, as well as to satisfy the requirements of the Township of Puslinch, who have requested a Cumulative Water Taking Study which will be submitted as part of the Site Plan Application. The Permit to Take Water application is typically completed concurrently with the Site Plan Application. We expect these studies to include essentially the same analysis; however, each would be geared towards the respective agency and their specific requirements.
- ii. Similar to our response above: these potential impacts will be assessed as part of the hydrogeological assessment to support a future Permit to Take Water application with the MECP and the Cumulative Water Taking Study for the Township.
- iii. The potential impacts on any changes to groundwater levels in the deeper supply aquifer would be assessed as part of the hydrogeological assessment to support the Permit to Take Water application with the MECP.
- iv. This will be addressed through the MECP's review of the Groundwater Resources Impact Assessment as part of the Environmental Compliance Approval application for the onsite sewage system. The impact assessment will be completed in accordance with the MECP's Chapter 22: Large Subsurface Sewage Disposal Systems guidelines to confirm the sewage effluent treatment requirements and assess potential impacts to groundwater quality. The impact assessment is typically completed once the hydrogeological assessment is complete. Pre-submission consultation with the MECP and preparation of the impact assessment will proceed concurrently with the Site Plan Application. Typically, the Township's Hydrogeologist is circulated on the impact assessment as part of Site Plan Approval.
- v. The stormwater management approach is outside of Crozier's scope and we defer to others to respond to this comment.
- vi. As part of the Permit to Take Water and Environmental Compliance Approval, MECP may require an ongoing groundwater monitoring program at the property boundary. The requirements for these programs will be confirmed at the appropriate times during the Permit to Take Water and Environmental Compliance Approval application process, which will be concurrent to the Site Plan Application.

The Region's interests regarding the Site's water and sanitary servicing are understood and acknowledged, especially as it pertains to the source protection areas for the Region's municipal drinking water wells in the area. The concerns raised above will be addressed by the Township through the Hydrogeological Assessment which will include Source Protection measures during the Site Plan Application, as well as MECP during the review of the future Permit to Take Water and Environmental Compliance Approval applications.

Should you have any questions or require any further information, please do not hesitate to contact the undersigned.

Sincerely,

C.F. CROZIER & ASSOCIATES INC.



Kyle Wetherall
Specialist, Private Services

KW/

C.F. CROZIER & ASSOCIATES INC.



Katherine Rentsch, P.Eng.
Manager, Private Services

c.c. Jordan Dyer, Fieldgate Properties Ltd.

J:\2900\2996 - Fieldgate Properties Ltd\7616 - 2809 Townline Road\Letters\2026.08.28_Response to Region of Waterloo Comments\2026.08.28_[2996-7616]
_CFCA Response To Region of Waterloo Comment Letter_Draft.docx