



December 13, 2018
MTE File No.: C41604-100

Jennifer Mondell
Reid's Heritage Homes
6783 Wellington Road 34, RR 22
Cambridge, ON N3C 2V4

Dear Ms. Mondell:

**Re: Response to City of Guelph Comments
Phase I and Phase II Environmental Site Assessment Reports
1533-1557 Gordon Street and 34 Lowes Road West, Guelph, Ontario**

At your request, MTE has prepared this response letter to address City of Guelph comments relating to the Phase I Environmental Site Assessment (ESA) report and Phase II ESA report completed by MTE for Reid's Heritage Homes Ltd. (the "Client"). The reports were prepared for a consolidated residential parcel of land comprising five contiguous properties with the following municipal addresses 1533, 1541, 1549, 1557 Gordon Street as well as 34 Lowes Road in Guelph, Ontario (the "Site").

The reports completed by MTE (herein the "**Reports**") are as follows:

- i) Phase I Environmental Site Assessment, 34 Lowes Road, 1533, 1541, 1549 and 1557 Gordon Street, dated July 15, 2016 by MTE Consultants Inc.
- ii) Phase II Environmental Site Assessment, 34 Lowes Road, 1533, 1541, 1549 and 1557 Gordon Street, dated September 26, 2016 by MTE Consultants Inc.

The objective of this assignment was to address preliminary comments #11 and #12 provided in the internal memorandum prepared by the City of Guelph, dated September 11, 2018. A copy of the memorandum is attached. This letter report should be read in conjunction with the abovementioned Phase I and II ESA reports completed by MTE for the Site.

Comment 11-a: Freedom of Information Request for 1483 Gordon Street

A written request was submitted to the Ministry of the Environment, Conservation and Parks (MECP) Freedom of Information (FOI) Office for information regarding the property located at 1483 Gordon Street (located approximately 150 m north of the Site).

A response was received from the MECP on December 5, 2016, indicating that records were located in response to the request. The records were provided with the MECP response and contained the following pertinent information:

- A Certificate of Approval (Air) for an in-situ remediation process to treat soil/groundwater contaminated with 'Target Compounds' (petroleum hydrocarbons, chlorinated solvents, organics and/or metals) by the injection of non-hazardous biostimulation compounds, issued to Vertex Environmental Solutions on August 16, 2007 (Number 1946-758KAJ). The Approval includes a Notice of Intended Location, which identifies 1483 Gordon Street, Guelph, ON as the location of the bioremediation process.

- A Certificate of Approval (Air) for a mobile in-situ and ex-situ remediation process to treat soil/groundwater contaminated with 'Target Compounds' (organic compounds) through the injection and application of non-hazardous chemical oxidation compounds, issued to Oxy Teknologies Inc. on January 18, 2018 (Number 2676-7AWLXK).
- A remediation work plan for 1483 Gordon Street in Guelph, Ontario, prepared by Oxy Teknologies Inc., dated July 17, 2008. The work plan details the proposed treatment process for contaminated soils and groundwater through the application of hydrogen peroxide and includes a site plan showing the extent and location of the contamination. Due to poor image quality, observations are limited, however the figure appears to show an area of petroleum hydrocarbon impacts approximately 150 m north of the Site.

Based on the distance to the Site (approximately 150 metres), the location of this property relative to the inferred groundwater flow direction (to the northeast), the environmental concern associated with this property is considered to be low. Furthermore, there were no exceedances of the 2011 Table 2 Standards for PHC fractions F1-F4 or BTEX compounds in any of the soil or groundwater samples submitted for analysis as part of the 2016 Phase II ESA investigation conducted by MTE.

A copy of these records is maintained on file with MTE.

Comment 11-b: Use of the Garage at 1533 ~~Lowes Road~~ (Gordon Street)

Note: The property located at 1533 Gordon Street was inadvertently mislabelled as 1533 Lowes Road West in the Executive Summary and Conclusion of the Phase I ESA Report.

As part of the 2016 Phase I ESA investigation, MTE reviewed municipal directories, fire insurance plans, aerial photography, and published and online records from the MECP, Technical Standards and Safety Authority (TSSA) for information related to the Site (including 1533 Gordon Street). MTE also contacted EcoLog Environmental Risk Information Services Ltd. to request a search of government and private records for information pertaining to the Site.

Furthermore, Mr. Mario Cotroneo, President of Mar-Cot Developments and the owner of 1533 Gordon Street at the time of the Phase I ESA investigation completed an interview questionnaire on July 6, 2016. Mr. Cotroneo indicated in the questionnaire that he was not aware of any use on his property other than residential.

Based on the findings of the Phase I ESA, the garage at 1533 Lowes Road was likely used for personal use (not commercial). There were no records to indicate any commercial or industrial activities at 1533 Gordon Street.

Comment 12-a: Phase II ESA Borehole Logs

The 2016 Phase II ESA was conducted in conjunction with a geotechnical investigation completed by Englobe. Draft borehole logs were completed by Englobe for the boreholes advanced during this investigation and were provided in Appendix C of the Phase II ESA Report. Finalized borehole logs for this investigation have been provided by Englobe and are attached to this letter.



Comment 12-b: Septic Tank and Leaching Bed Leakage

Based on the findings of the 2016 Phase I ESA, the septic systems servicing the residential dwellings at the Site were not considered to be a potentially contaminating activity representing a high risk of contamination to soil and groundwater. Recommendations related to the inspection and decommissioning of the septic systems following their removal were included in the 2016 Phase I ESA. Reid's Heritage Homes Ltd. has indicated that there are currently tenants living in the residences at the Site and that the septic systems will be decommissioned and removed during future construction works at the Site.

Closure and Limitations

Services provided by MTE Consultants Inc. (MTE) were conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the Environmental Engineering & Consulting profession. No other warranty or representation, expressed or implied, as to the accuracy of the information, conclusions or recommendations is included or intended in this letter.

This letter was completed for the sole use of MTE, the City of Guelph, and Reid's Heritage Homes Ltd. This letter may not deal with all issues potentially applicable to the Site and may omit issues, which are, or may be, of interest to the reader.

Any use which a third party makes of this report, or any reliance on, or decisions to be made based upon it, are the responsibility of such third parties. MTE accepts no responsibility for liabilities incurred by or damages, if any suffered by any third party as a result of decisions made or actions taken, based upon this letter. Others with interest in the Site should undertake their own investigations and studies to determine how or if the condition affects them or their plans.

Should you have any questions concerning the content of the letter or the review that was completed, please do not hesitate to contact the undersigned at your convenience.

Yours truly,

MTE CONSULTANTS INC.

Robert Reaume, P.Eng., QP_{ESA}
Division Manager, Environmental Kitchener

Francis Knowles, E.I.T
Environmental Engineer in Training

FMK:dem
Attach.



ATTACHMENTS

INTERNAL MEMO



FILE NO. ZC1710

DATE September 11, 2018

TO **Michael Witmer**

FROM Jim Hall

DIVISION Development Engineering

DEPARTMENT Engineering and Capital Infrastructure Services Department

**SUBJECT Preliminary Comments
1553-1557 Gordon Street and 34 Lowes Road West**

Hi Mike,

Please see my attached preliminary engineering comments on the above file. Please note that these are not comprehensive comments, and new comments may be provided at a later date once additional details are known. If you have any questions, please don't hesitate to contact me.

Sincerely,

Jim Hall, P.Eng.
Development-Infrastructure Engineer

Development Engineering
Engineering and Capital Infrastructure Services Department

T 519-822-1260 x 3514
E jim.hall@guelph.ca

Cc: Mary Angelo, Michelle Thalen

The following preliminary comments are provided based on the 1st submission for the above-noted application as it relates to the following document(s):

Plans

- **Site Plan**, prepared by Martin Simmons Architects, Dated October 3, 2017
- **Tree Preservation Plan**, Drawing No. TPP1, prepared by Aboud & Associates Inc., Project No. AA17-109A, Revision 1 dated November 2, 2017
- **Preliminary Servicing Concept**, Drawing No. C-100, prepared by Stantec, Project No. 161413496, Revision 0 dated September 9, 2017
- **Preliminary Grading Concept**, Drawing No. C-400, prepared by Stantec, Project No. 161413496, Revision 0 dated September 9, 2017
- **Topographic Survey**, prepared by Van Harten Surveying Inc., Project No. 24419-17, Revision 1 [not dated, not signed]

Reports

- **Planning Justification Report**, prepared by GSP Group, Dated November 2017
- **Functional Servicing Report**, prepared by Stantec, File No. 1614-13496, dated October 2017
- **Geotechnical Investigation Report**, prepared by Englobe Corp., Reference No. 160-P-0011540-0-01-100 dated September 30, 2016
- **Hydrogeology Study**, prepared by Englobe Corp., Reference No. 160-P-0011540-0-02-300 dated November 15, 2017
- **Phase I Environmental Site Assessment**, prepared by MTE Consultants Inc., File No. 41604-100, dated July 15, 2016
- **Phase II Environmental Site Assessment**, prepared by MTE Consultants Inc., File No. 41604-100, dated September 29, 2016
- **Appendix B – City of Guelph Site Screening Questionnaire for Identifying Potential Contamination At A Site**, prepared by Reid's Heritage Homes Ltd., dated November 17, 2017
- **Traffic Impact Study**, prepared by Paradigm Transportation Solutions Limited, Dated September 2017

On completing the review, the following comments are provided:

Please note that due to the nature of the below comments they are to be considered as preliminary comments only, and additional comments not provided below may be provided during future reviews:

Preliminary Grading Concept

1. Please adjust the line-type scale for swales
2. Please adjust location of elevations and other notes to avoid overlapping text (some elements of this plan could not be reviewed due to this issue)

3. Please note that retaining walls are not permitted adjacent to residential lots unless they are less than 1.0m in height.

Functional Servicing Report

4. The Factored Infiltration Rates provided do not match those indicated in the Geotechnical Investigation Report. Please review and revise where necessary.
5. Please note that infiltration rates must be based on in-situ testing only.
6. OGS unit sizing and selection should be based on ETV Testing Certified units. Please note that typically, OGS units will not provide 80% TSS removal. Additional treatment may be necessary to meet targets.

Geotechnical Investigation Report

7. Seasonal high ground water elevation was not determined at the time of this report; the report indicates that additional monitoring is necessary. Please update the Geotechnical Investigation Report once the seasonal high ground water elevation has been determined.

Hydrogeology Study

8. Long-Term ground water monitoring was set for only one year (and less than one year was reported); we recommend a minimum of 3 years of monitoring to help remove some year-by-year inconsistencies.
9. Why was data removed from the monitoring data (Figure 101)? What was the rationale for determining the data to be "unreliable"? Perhaps this data should remain in the dataset, and either the statistical significance mathematically determined or mechanical error investigated and described.
10. Please see additional preliminary comments on the Hydrogeology Study provided under separate cover.

Environmental Site Assessments & SSQ

11. Please provide an updated Phase I ESA or a letter-report to address the following:
 - a. Information on a former gas station at 1483 Gordon Street was outstanding at the time of reporting (2016); please update and summarize the findings for City review.
 - b. Additional information and clarification should be provided concerning the use of the garage at 1533 Lowes Road West property; was this for commercial or personal use? This may dictate if a RSC is required.
12. Please provide an updated Phase II ESA or a letter-report to address the following:
 - a. The current report is missing borehole logs from MTE's Phase II ESA work; please provide these in the update.
 - b. Please update to provide additional information on the potential impacts emanating from septic tank and/or leaching bed leakage.

13. A QP must submit a "Reliance Letter" to indicate that despite any limitations or qualifications included in the reports, the City is authorized to rely on all information and opinion provided in the reports.
14. The submitted Site Screening Questionnaire (SSQ) does not appear to have been completed correctly; many statements within the questionnaire indicate "No" where other materials submitted for this Zoning application indicate otherwise. Please update and resubmit the SSQ.

Traffic Impact Study & TDM

15. The Traffic Impact Study indicates that the turning movement counts were completed on August 23rd, 2017. The counts shall be completed outside of summer months to ensure the travel patterns and volumes of school traffic are captured. As such, the data are considered invalid.
16. Section 5.2 Gordon Street South Approach Triangle indicates that the sight triangle at the intersection of Gordon Street at Lowes Road shall be 18 metres by 18 metres. The calculations to determine the required sight triangle was not provided. The calculations and drawing shall be provided for our review. The size and location of the triangle may impact the placement of the buildings on-site.
17. TDM related comments are as follows:
 - a. The recommendations in the Traffic Impact Study and the Urban Design Brief both provide good guidance on TDM-supportive measures to include in the development.
 - b. TDM staff support the recommended 123 parking spaces instead of the required 133.
 - c. TDM staff support the Traffic Impact Study recommendations to unbundle parking, providing a car share vehicle on-site, and meeting or exceeding the 0.68 bicycle parking spaces per unit (1 per unit is preferred).
 - d. Staff can work with the developer to identify potential bikeshare parking needs (noted in Urban Design Brief).
 - e. Please replace the old Cycling Master Plan network map with the updated ATN map. http://guelph.ca/wp-content/uploads/ATT2_Map_CMPandATNNetwork.pdf



Ground Elevation: 332.87 m

Borehole Number: BH-101-16

Northing: 4817540.2 m

Job N°: P-0011540-0-01-100

Easting: 564981.5 m

Drill Date: 2016-09-13

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

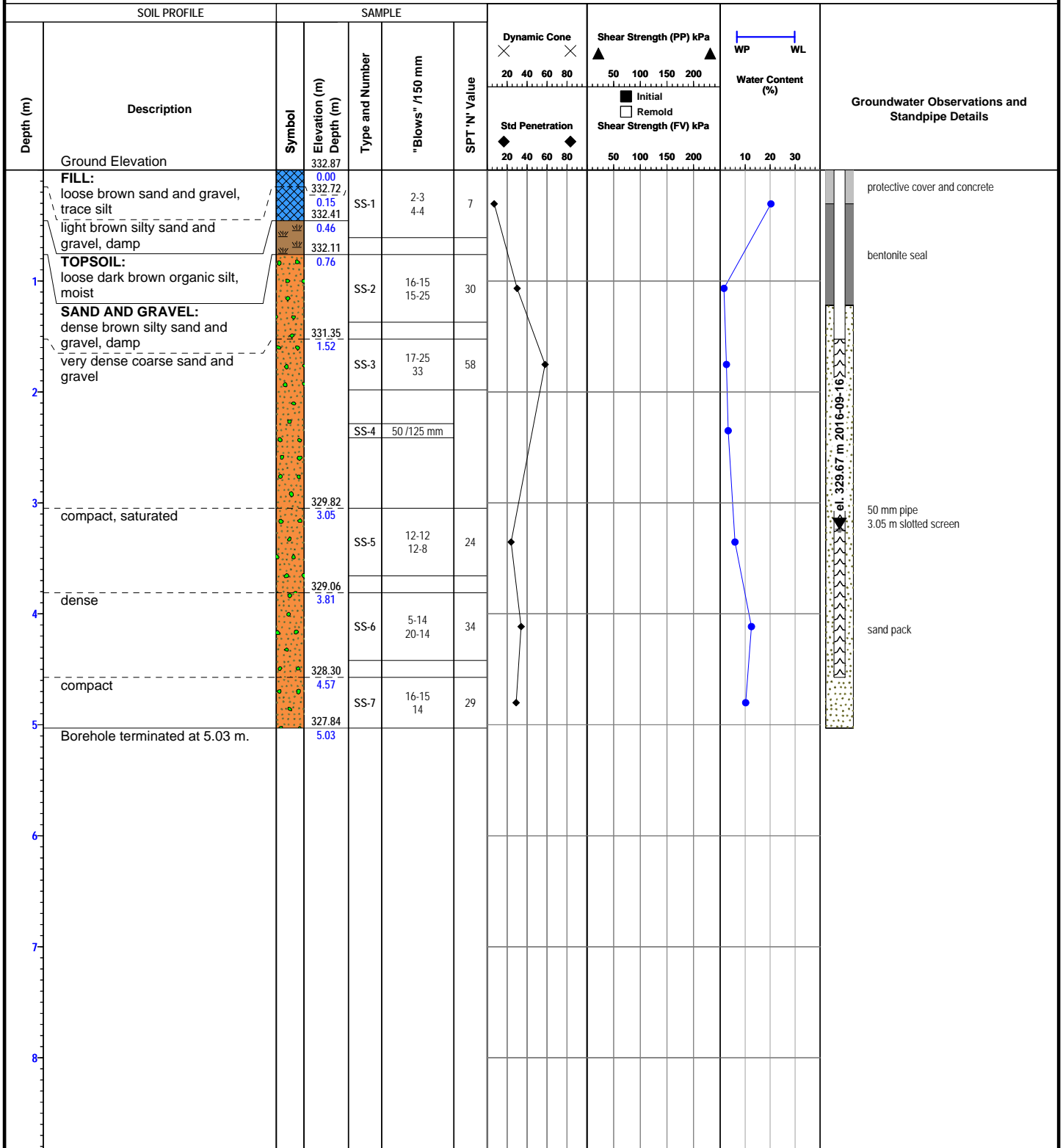
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes: Water level measurement provided by MTE Consultants Inc.



Ground Elevation: 332.87 m

Borehole Number: BH-102-16

Northing: 4817554.1 m

Job N°: P-0011540-0-01-100

Easting: 564993.1 m

Drill Date: 2016-09-13

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

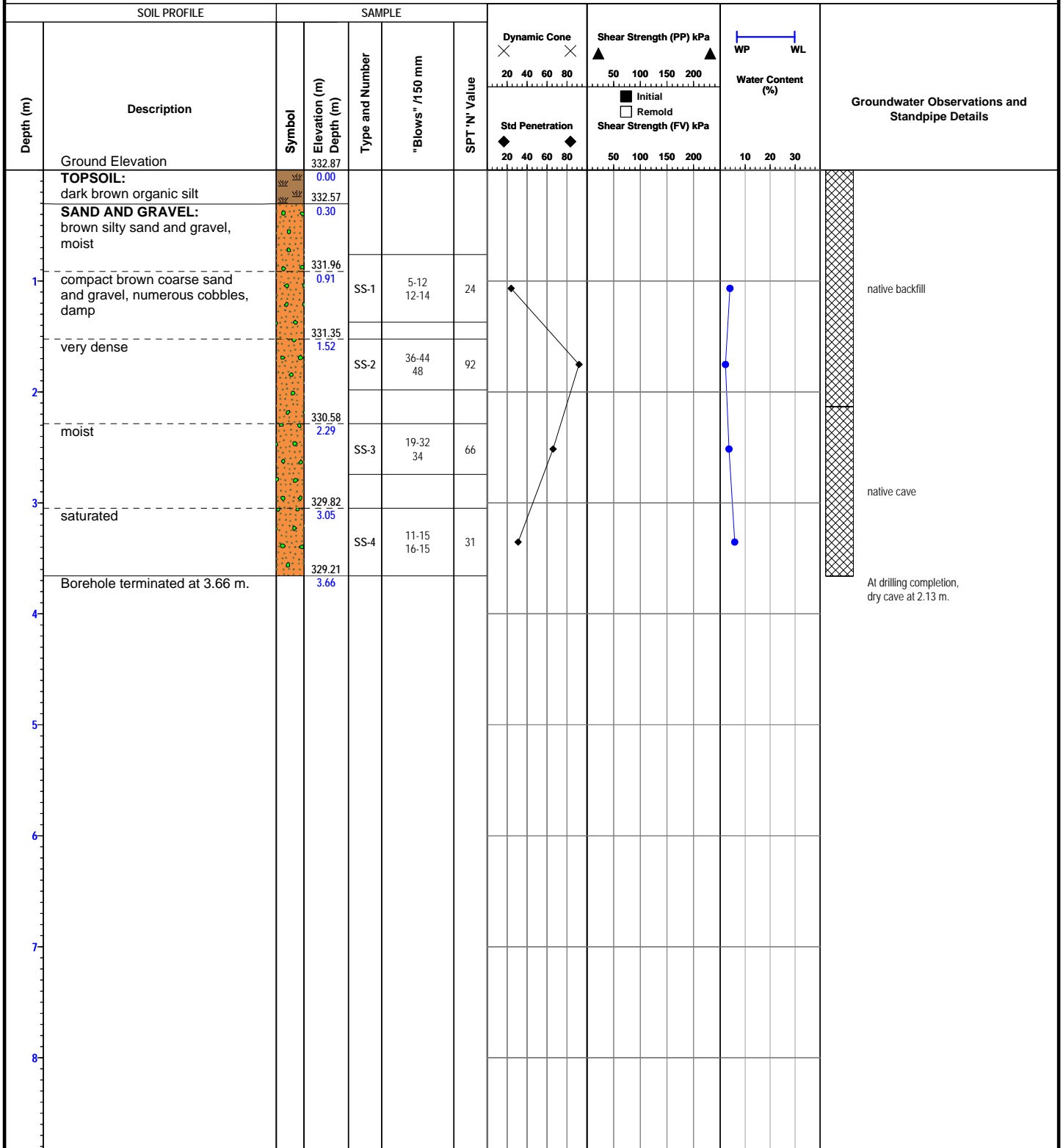
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Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes:



Ground Elevation: 333.08 m

Borehole Number: BH-103-16

Northing: 4817497.3 m

Job N°: P-0011540-0-01-100

Easting: 564954.9 m

Drill Date: 2016-09-13

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

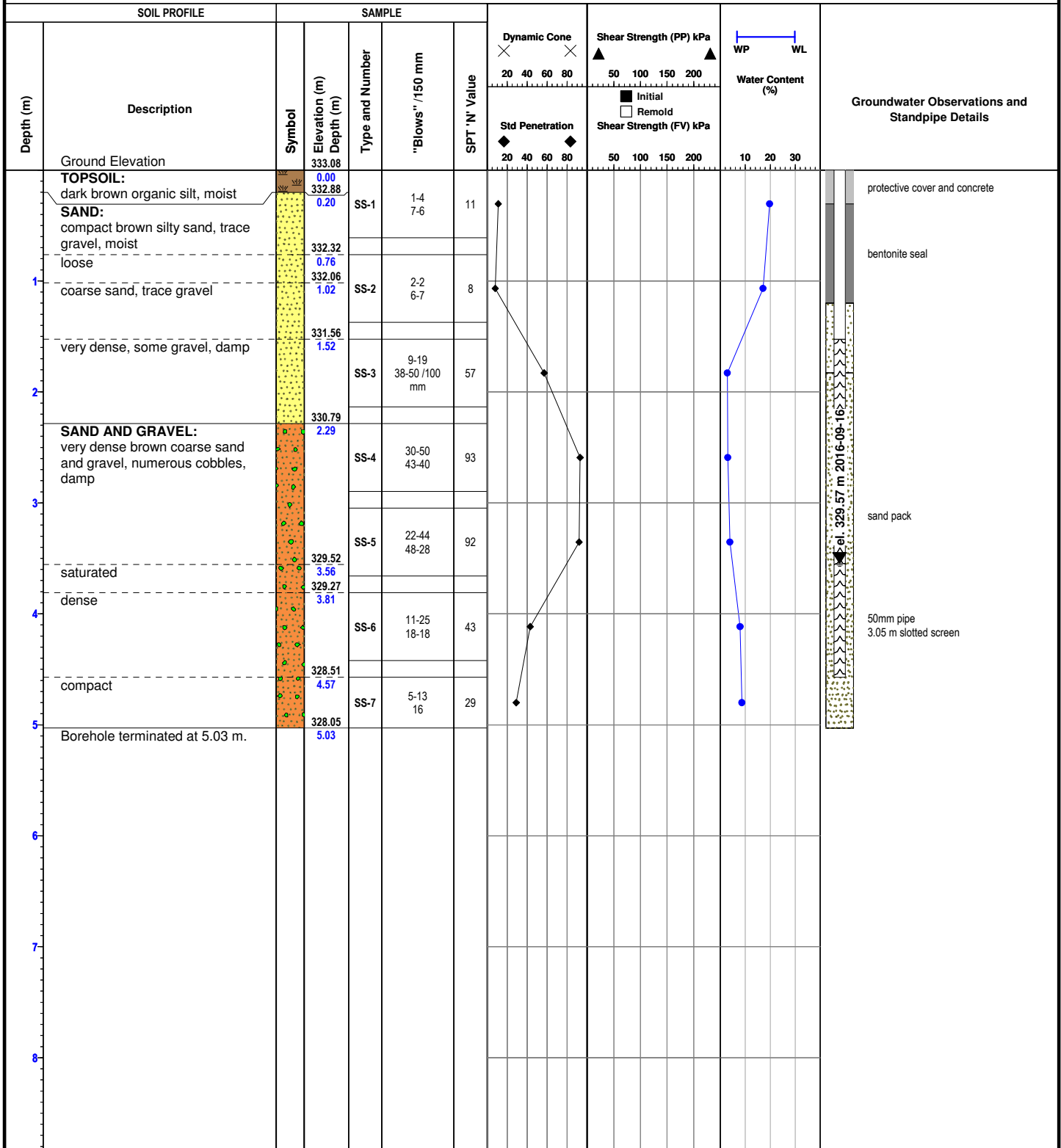
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Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes: Water level measurement provided by MTE Consultants Inc.



Ground Elevation: 333.00 m

Borehole Number: BH-104-16

Northing: 4817534.4 m

Job N°: P-0011540-0-01-100

Easting: 565000.4 m

Drill Date: 2016-09-14

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

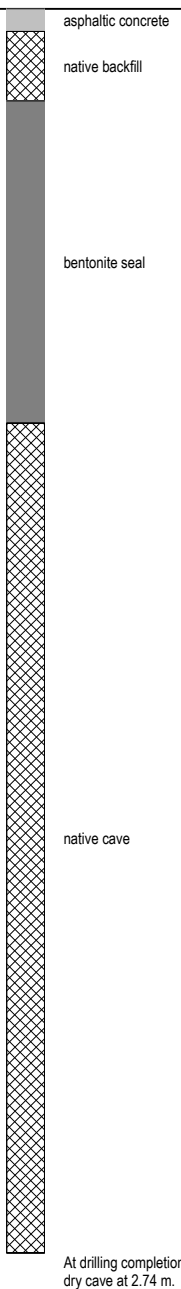
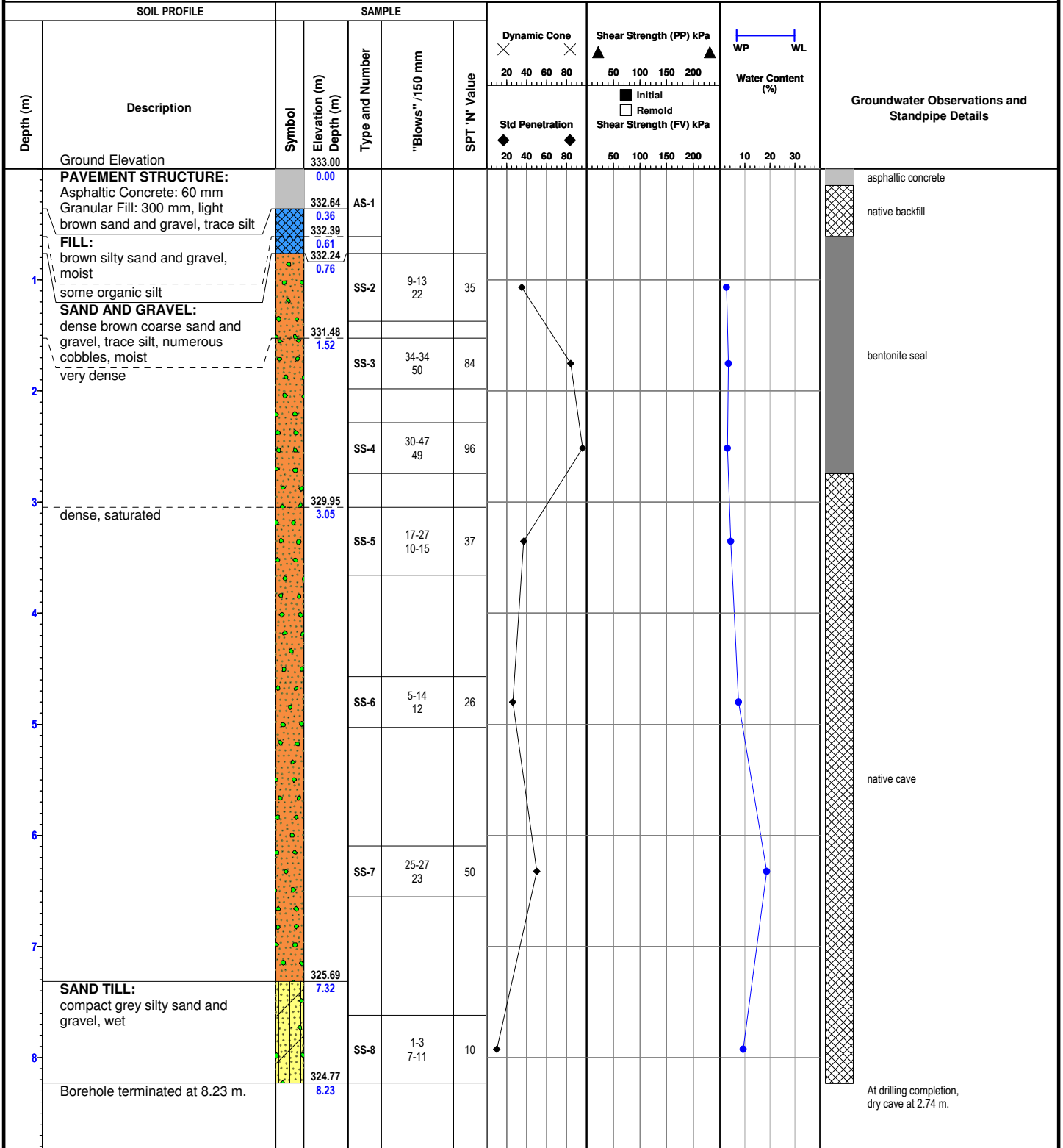
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



At drilling completion, dry cave at 2.74 m.

Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes: * Blow counts affected by heave.



Ground Elevation: 333.12 m

Borehole Number: BH-105-16

Northing: 4817471.0 m

Job N°: P-0011540-0-01-100

Easting: 564986.3 m

Drill Date: 2016-09-14

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

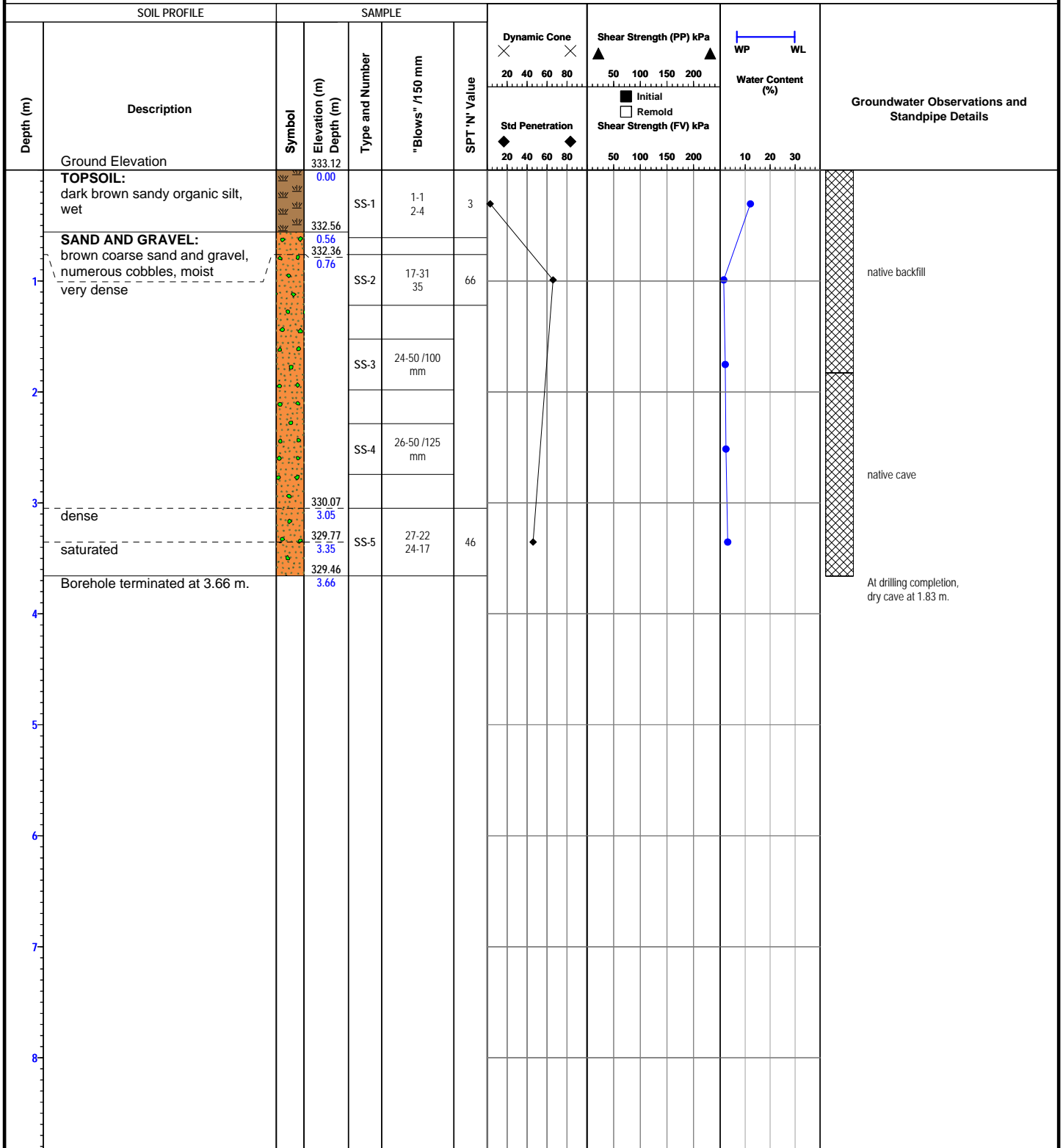
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes:



Ground Elevation: 333.56 m

Borehole Number: BH-106-16

Northing: 4817452.7 m

Job N°: P-0011540-0-01-100

Easting: 564992.4 m

Drill Date: 2016-09-14

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

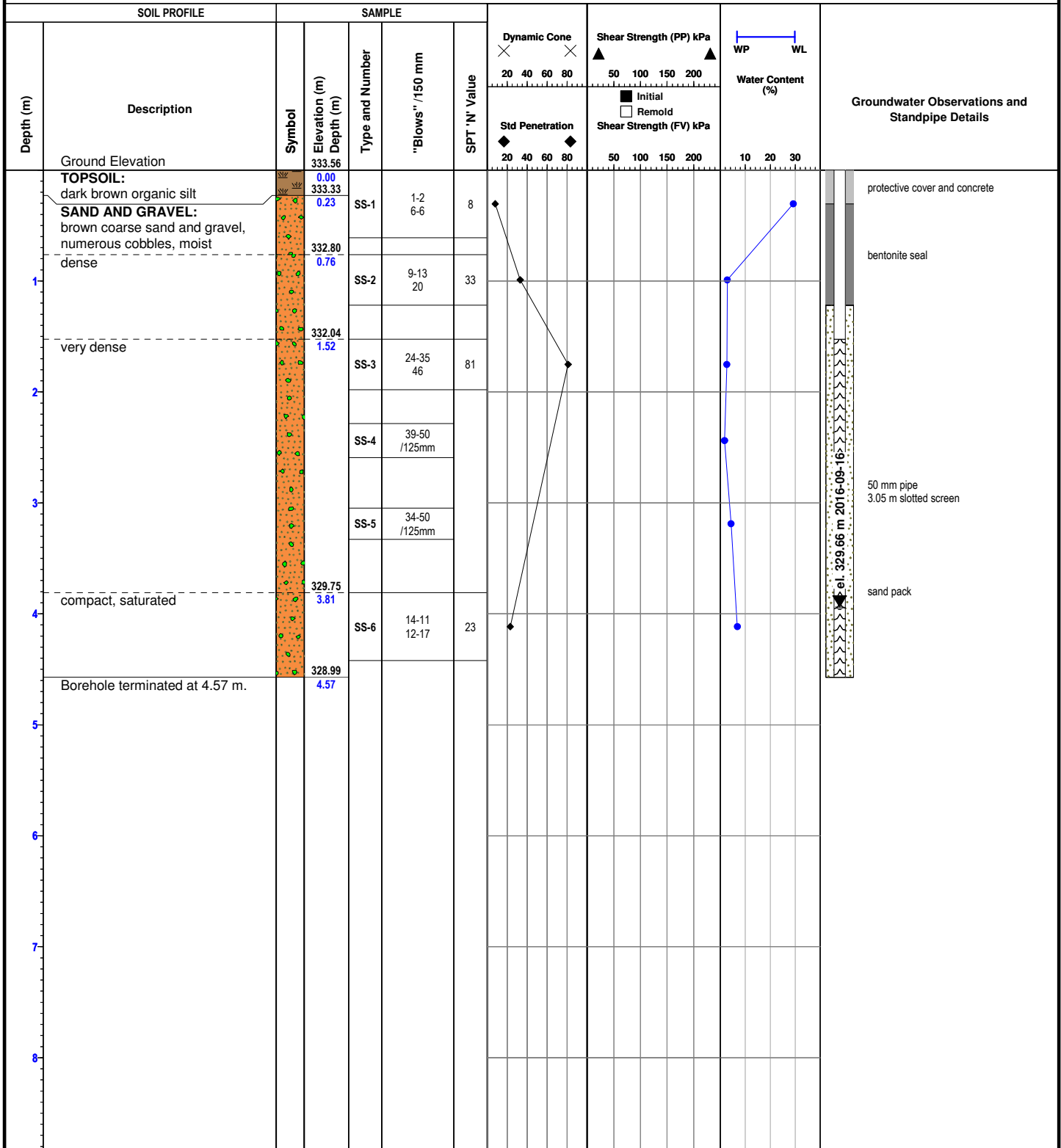
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes: Water level measurement provided by MTE Consultants Inc.



Ground Elevation: 333.05 m

Borehole Number: BH-107-16

Northing: 4817480.5 m

Job N°: P-0011540-0-01-100

Easting: 565023.5 m

Drill Date: 2016-09-14

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

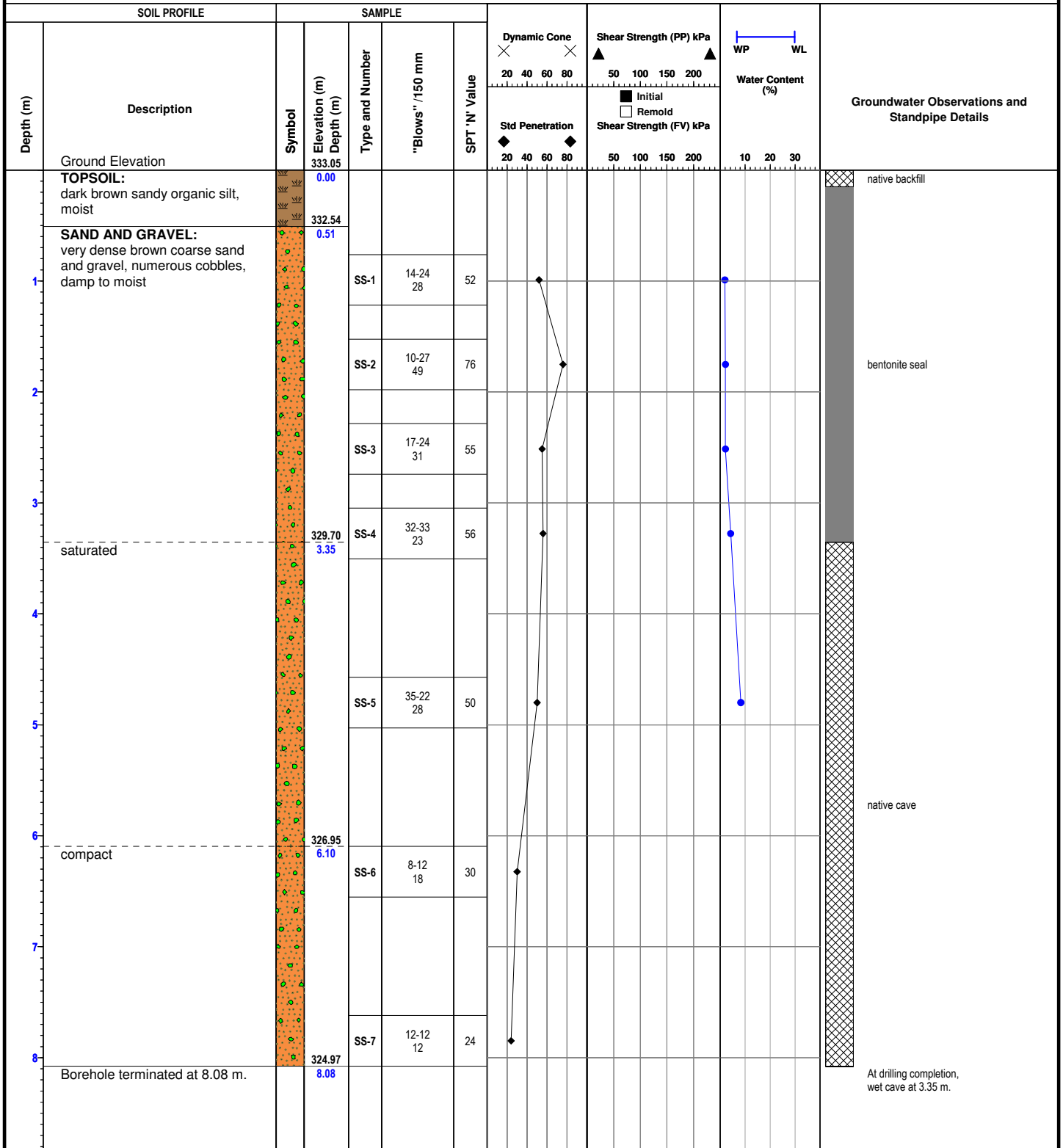
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 50.0

EQ-09-Ge-72 R.1 18.02.2011



Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes:

At drilling completion, wet cave at 3.35 m.



Ground Elevation: 333.36 m

Borehole Number: BH-108-16

Northing: 4817510.0 m

Job N°: P-0011540-0-01-100

Easting: 565028.9 m

Drill Date: 2016-09-15

Project: Proposed Residential Apartment Building

Field Tech: D. Gonser

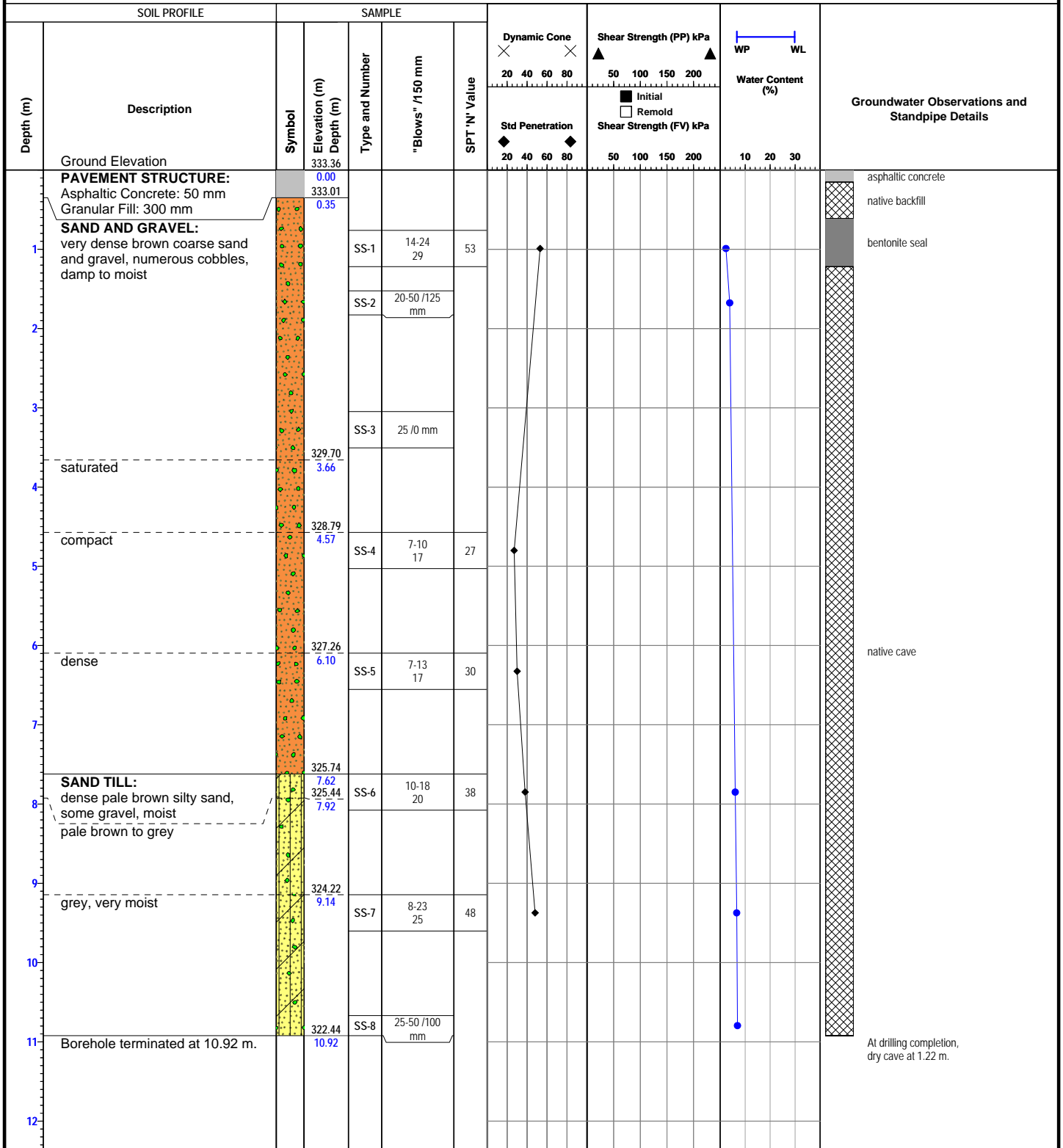
Location: 34 Lowes Road and 1533-1557 Gordon Street, Guelph, Ontario

Drill Method: Hollow Stem Auger

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Vertical Scale = 1 : 70.0

EQ-09-Ge-72 R.1 18.02.2011



At drilling completion, dry cave at 1.22 m.

Reviewed by: D. Gonser

Drafted by: D. Kunac

Sheet: 1 of 1

Notes: