DECEMBER 8, 2025

PROJECT NO: 2022-7556

SENT VIA: EMAIL

Town of Halton Hills
1 Halton Hills Drive
Halton Hills, ON L7G 5G2

Attention: **Jessica Rahim**
Senior Planner, Development Review

RE: **SCOPED SUBWATERSHED STUDY TERMS OF REFERENCE COMMENT RESPONSES**
9094 REGIONAL ROAD 25
TOWN OF HALTON HILLS, HALTON REGION

Dear Jessica,

Please find our responses to the Scoped Subwatershed Study (SWS) Terms of Reference (ToR) comments received from the Town of Halton Hills and Conservation Halton (CH) with respect to the above-noted project. The attached response matrix was prepared with input from the following consultants:

- Dillon Consulting Limited – Natural Heritage
- GEO Morphix Ltd. – Fluvial Geomorphology
- Soil Engineers Ltd. – Hydrogeology and Geotechnical Engineering
- Paul Brown & Associates Inc. – Planning

We trust our responses address the concerns of the Town and CH. Please contact our office should you have any questions.

Sincerely,

C.F. CROZIER & ASSOCIATES INC.

Julie Scott, P.Eng.
Manager, Land Development

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Department/Agency	Comment	Assigned to	Response
Town of Halton Hills – Jessica Rahim, Senior Planner, Development Review	**Development Engineering**		
	Expand the study area to include the adjacent tributary/reach. Since the system converges downstream, it is essential to incorporate this area in the evaluation process. We recognize this evaluation would be conducted through a desktop analysis. The area in question is highlighted in red hatching below but is open to refinement as drainage patterns to the tributary are unknown to staff. 	Crozier	Per the review of topography in the area, it was determined that the red hatched area, including the adjacent tributary/reach, does not contribute to the hydrology of the watercourse within the Site and is therefore not included in the detailed study area. The flows through the adjacent tributary are considered when looking at flows/floodplain downstream of the Site.
	During a meeting on Friday, October 21, which was unrelated to this project, we learned that Conservation Halton now possesses a water budget model for existing conditions. Given that these lands have not been studied by the Town, this model should serve as the baseline for existing conditions. The applicant will have to follow up directly with CH about the model.	Crozier	Noted, Crozier has reached out to CH to obtain the water budget model.
	Halton Region		
	<u>Groundwater Comments:</u> 1. As part of pre-consultation process, Regional staff stated that the Region's area of interest with respect to groundwater impacts are specific to any potential private well impacts that could occur as a result of installation of Regional infrastructure. It is recommended that the Scoped Subwatershed Study (SWS) Terms of Reference be updated to speak to and identify that the SWS should also provide assessment of potential impacts to private wells. The Terms of reference currently does not speak to an assessment or any potential impacts to private water supplies that may be impacted by these lands developing.	Soil Eng	As indicated in Section 8.6.4 of the revised Hydrogeological Assessment, dated November 24, 2025, as no short-term construction dewatering from the groundwater source is expected, no significant impacts to the potential groundwater users are

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			anticipated if the wells exist and in service. Additionally, as the project is still in the early stages, and due to the potential well record status updates, should the well survey still be required, it can be carried out approximately 2 months prior to commencing construction.
	2. Should this application move forward, Regional staff will be requiring a Well Survey & Monitoring Report to be provided. The SWS should also provide baseline info and discussion from a groundwater perspective that would be used as part of the future Well Survey & Monitoring Report.	Soil Eng	Refer to comment 1 above.
	<u>Section 9.0: Stormwater Management</u> 1. This section of the Terms of Reference speaks to how Stormwater Management will be assessed. From a Regional perspective, this section identifies that SWM criteria will be in accordance with, amongst others, Regional standards. While it is not necessary to provide specific reference to Regional SWM standards and requirements in this section of the Terms of Reference (e.g. pre and post SWM flows being addressed from Regional Road 25), Regional staff will be reviewing the SWS for those details when it is submitted.	Crozier	Noted.
	Town of Milton		
	1. The subject lands are located within the headwaters of Sixteen Mile Creek Subwatershed Area No. 2. The following studies have been completed by the Region of Halton (1996) and the Town of Milton (1999, 2000, 2004, 2015). • Sixteen Mile Creek Watershed Plan (Gore & Storrie, Feb 1996) • 401 Industrial Business Park, Functional Stormwater and Environmental Management Strategy (Philips Eng. Ltd., July 2000) - 401 Industrial Park Secondary Plan	All	Noted.

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	• Sixteen Mile Creek Sub-watershed Planning Study Areas 2 and 7 (Philips Planning and Engineering Limited, 2000) - Bristol Secondary Plan • Indian Creek / Sixteen Mile Creek Sub-watershed Management Study (Philips Engineering Ltd., December 2004) - Sherwood Secondary Plan • Sixteen Mile Creek, Areas 2 & 7 Sub-watershed Update Study (AMEC, Nov 2015) - Boyne & Derry Green Secondary Plans • EBC East Subdivision design (Watercourse N-2-B and EBC East SWM Pond) (2000 to 2005)		
	2. The earlier studies (1996 & 2000) provide various amounts of existing conditions baseline data in the northern catchments of sub-watershed Area 2 - the area pertinent to the subject lands. However, no assessments or models were undertaken in a "developed" scenario for the subject lands. The latter studies (2004 to 2015) focused on the sub-watershed management criteria in support of the noted secondary plans further downstream.	All	Noted.
	3. The proponent's consulting team should become familiar with the above noted studies, in particular the 401 FSEMS (Philips, 2000) where-in control of peak stormwater flow rates to pre-development rates or less is required and infiltration in the order of 300m/year may be required.	Crozier	Noted.
	4. The proponent should be aware of the Urban Milton, Sixteen Mile Creek, Flood Hazard Mapping Study (Greck, 2023) undertaken by Conservation Halton that affects the subject lands and documents the flood conditions downstream of the subject lands.	Crozier	Noted. The study by Greck has been reviewed by Crozier. The modeling completed as part of this study serves as the starting point for the hydrology and hydraulic models for this Scoped SWS.
	5. The proponent shall demonstrate to the Town of Milton's satisfaction no adverse effects to Town of Milton natural heritage and stormwater infrastructure, including but not limited to, watercourse N-2-B, culverts and Highpoint SWM Pond and associated infrastructure. Further, the proponent shall demonstrate no adverse effects to flooding of downstream properties.	Crozier / Dillon	Noted. The wording related to effects to stormwater infrastructure and flooding has been added to the ToR in Section 4.1. The stormwater infrastructure outlined in this comment will be specifically

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			discussed as part of the next Scoped SWS submission. Impacts and mitigation related to natural heritage were discussed in Section 7.4 of the ToR.
	6. Should Halton Hills proceed with intake of an application for the subject lands it is recommended that the proponent undertake a sub-watershed Impact Study (SIS) in support of the application, with a Terms of Reference developed to satisfaction of Town of Halton Hills, Town of Milton, Region of Halton and Conservation Halton.		This Scoped SWS is being provided in lieu of a SIS.
	7. The Town of Milton is requesting that the SIS be peer-reviewed in accordance with the Town of Halton Hill's policies and the expense of the Owner.		Noted.
Town of Halton Hills – Sarah Labrie, Senior Environmental Planner	**General**		
	Please include a comment response matrix and a track changes version of the ToR with the next submission.	All	Noted.
	Please include a draft Table of Contents with the next submission of the terms of reference for the scoped subwatershed study (hereafter SSWS).	All	A draft Table to Contents will be included with the ToR resubmission.
	Terms of Reference		
	GENERAL - Conforming to the PPS 2024, a Natural Heritage System (NHS) is identified on Map1G of the Halton Region Official Plan; this system must be referenced in the SSWS. Refinements to this system may be permitted subject to Town approval of a study according to policy 116.1. This will include detailed justification for any changes, along with a table summarizing and tracking any proposed changes. Provide a conceptual decision-making framework and tracking table, including a buffer refinement framework, in the ToR. Refinements of the NHS must demonstrate avoidance of negative impacts and confirm that the goals and objectives of preserving and enhancing the NHS have been met.	Dillon	The ToR has been updated to include reference to the ROP. The ROP was discussed in Section 2.3.1 of the Scoped SWS.
	1.2 - The location, extent, present status, and significance of natural heritage features will be identified through desktop landscape	Dillon	The ToR has been updated.

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	analysis, including consideration of Map1G of the Regional Official Plan (ROP), and verified through necessary field investigations.		The location, extent, status, and significance of natural heritage features have been identified through a combination of background review (Appendix D – Figure 2), aerial analysis, and field investigations. Significance of Natural Heritage Features is discussed in Section 5 of the Scoped SWS. The extent of features is shown in Appendix D - Figure 4.
	1.2 – Delineation and or "defining" of natural heritage and hazard limits, including buffers and setbacks, will be determined in direct consultation with the Town and relevant agencies. Formal staking of features may be required and should be arranged in the appropriate season.	Dillon	The ToR has been updated. Formal staking occurred with the Municipality and Conservation Authority on September 19, 2025. The results of the staking are shown on Appendix D – Figure 3 of the Scoped SWS.
	1.2 – The comprehensive SWS will establish goals, objectives and action items for the design, implementation, monitoring, and adaptive management that will increase Town certainty that the proposed land use changes and future development of the lands will not result in a negative impact on the natural heritage system or its features in the long-term.	Dillon	The ToR has been updated. A detailed monitoring and adaptive management program will be provided in the next Scoped SWS submission following completion of the field programs.
	1.3 – To ensure accurate assessments, please confirm that the hydrology study area considers the natural extent of wetland catchments, as drainage areas may extend beyond parcel and/or primary study area boundaries.	Crozier	The hydrology study area considers the natural extent of wetlands. Refer to the drainage plans provided with the SSWS for more details.

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			Wording indicating this has been added to Section 1.3 of the updated ToR.
	1.4 – Provide decision-making matrices for the provided recommendations on targets to be met, the evaluation of alternative land use scenarios and development concepts, and for analysis of impacts to environmental features, including the NHS (i.e., weighted decision matrices).	Dillon	Management recommendations, frameworks and targets will be discussed in the SSWS.
	1.4 – Elaborate on the appropriateness of existing conditions inventories to permit subsequent performance analysis by clarifying the intended duration of the subwatershed study data collection. Standard best practices for subwatershed studies includes multi-year data collection to enable informed decision-making. Please confirm if inventories are intended to be multi-year and/or repeat (beyond a three-season botanical survey), and comment on the proposed robustness of the data collection.	Dillon	Inventories are proposed following provincially accepted guidelines, which do not require multiple years of study. These methods and single-year studies have been applied and accepted on land development projects within the Town and Region (e.g., Premier Gateway Scoped SWS). Please refer to the Scoped SWS methods section 3.1.2. Nonetheless, the Scoped SWS will be clear on the limitations of the methods and conclusions when discussing the results of the inventories.
	2.0 – Please update to include wetlands in the scope of discussion for this section.	Crozier	Need clarification as to what needs to be included. Crozier has reached out to the Town accordingly through email on December 5.
	3.0 – Clarify the appropriateness of using the Toronto Region Conservation Authority Stormwater Management guideline. Coordination with Development Engineering and Conservation Halton is required to determine the applicable stormwater guideline(s).	GEO Morphix	The Terms of References refers specifically to Appendix B of the TRCA (2012) guidelines, which provides direction on evaluating erosion sensitivity,

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			completing erosion threshold calculations and conducting erosion exceedance analyses. Section 3.0 of the ToR has been updated to generally describe the contents of Appendix B. The approach and methodology outlined in Appendix B of TRCA (2012) has been consistently applied and accepted elsewhere in the jurisdictions of Conservation Halton and The Town of Halton Hills.
	3.0 – Where 'standard field protocols' are indicated, include references for those protocols and rationale for their appropriateness at the site level (this applies generally to all methodologies proposed). Where protocols are no longer available online, please include copies of the protocols for agency staff. Where protocols are adapted to the site level, include rationale and details of the methodologies.	GEO Morphix	The standard protocols referenced include the Rapid Geomorphic Assessment (RGA) (MOE, 2003) and Rapid Stream Assessment Technique (RSAT) (Galli, 1996). These are widely applied tools that have been accepted in jurisdictions across the Greater Toronto and Hamilton Area, including the Town of Halton Hills and Conservation Halton jurisdictions. Fluvial geomorphology characterization and the RGA and RSAT are completed at the reach scale and can be readily applied at the site level.

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			Field assessment protocols are also based on scientific journal articles and other published literature (e.g., books). The distribution of these resources is restricted by copyright protections.
	4.2 – The PPS 2024 defines the "erosion hazard limit" to include an erosion/erosion access allowance. Because the SSWS will be used to support planning applications, the study recommendations should conform to applicable policy documents (PPS, ROP, area OP).	Soil Eng	Noted. The SSWS includes an erosion hazard assessment following policies identified in the PPS, ROP, Area OP, and guidelines established by MNR and CH.
	4.3 – Clarify whether the presence of critical habitat, or the status of the species, is in question.	GEO Morphix	The extent of critical habitat is being evaluated as part of the SSWS. Consultation with Fisheries and Oceans Canada (DFO) is being completed as the SSWS proceeds. Section 4.3 of the ToR has been revised for clarity.
	6.0 – Baseline hydrologic conditions should be established for the wetland within the study area. Although the requirement for a full wetland water balance may be risk-dependent, existing feature conditions need to be documented, as per the study objectives. Please demonstrate that the characterization of wetland features includes hydrologic characterization through the annual collection of hydrologic and hydroperiod data (i.e., piezometer installation). The study should be consistent with the Conservation Halton Wetland Water Balance Assessment guideline.	Soil Eng	Monitoring wells and piezometers are to be proposed in the vicinity of the wetlands at the Subject Site, which will be monitored on a monthly basis for a one (1) year period). Results will be provided with the next SSWS submission.
	6.0 – Include more details on the risk assessment approach proposed to be followed when determining whether to recommend a feature-based water balance (including methodology for ranking wetland sensitivity). Approved technical guidelines from the appropriate	Dillon	Wetland characterization and sensitivity ranking will be completed by Dillon and provided with the next SSWS

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	Conservation Authority (TRCA or CVC) should be referenced and followed.		submission once the field program is complete.
	7.0 – This section must be updated to include an overview and integration of the Halton Region Official Plan Natural Heritage System policies and mapping. The components of the system to be identified in the SSWS are outlined in policy 115.3 and 115.4, which are consistent with those outlined in the PPS 2024. Any field inventories proposed need to be rationalized and designed through the lens of the PPS and applicable ROP and Town OP. Please confirm how the proposed studies will provide a foundation for the assessment of NHS policy conformance.	Dillon	The methods and results of the 2025 field program are discussed in Sections 3.1.2 and 3.1.3 of the Scoped SWS.
	7.0 - Include a summary table of information for the proposed field investigations, including survey type and target taxon, methodology, timing (date, time of day), frequency, seasonal/annual repetition, observer qualifications and consulting firm, and policy reference. This summary table will be updated with data collected during field investigations and will be included in the study report. Provincial monitoring program protocols are not necessarily appropriate for detection at the subwatershed or site level, and so the precautionary principle will apply.	Dillon	These details were provided in Sections 7.1 and 7.2 of the ToR. A detailed summary table of the completed surveys will be provided in the SSWS after the field program has been completed. In our experience, provincial protocols have been the accepted standard that has been applied to site level studies within the Region and Town. Please refer to the Scoped SWS Section 3.1.2 for discussion on methods. Nonetheless, the SSWS will be clear on the limitations of the methods and conclusions when discussing the results of the inventories once the full field program has been completed.
	7.1 – Clarify the survey/sampling timing, frequency, and repetition for the headwater drainage and aquatic assessments.	Dillon	Please refer to the Scoped SWS Section 3.1.2.

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	7.2 – Given the presence of suitable wetland habitat in the study area, turtle overwintering area surveys are required annually in spring and fall, timed according to environmental conditions. A qualified biologist/ecologist with expertise in field herpetology is required to design and conduct the basking surveys. Update this section to include inventories to support the assessment of turtle wintering areas.	Dillon	The wetlands and the watercourse within the Site are too shallow to support turtle overwintering. The Site does not contain natural water bodies, large wetlands, and bogs or fens, all of which are identified in SWH 6E/7E as suitable overwintering habitats. As such turtle surveys have not been proposed since the habitat conditions within the Site are not suitable to support this life process and these.
	7.2 - Given the presence of terrestrial crayfish on site, provide details for addressing this specific type of significant wildlife habitat. See also comments on section 6 related to wetland water balance.	Dillon	Significant wildlife habitat (SWH) was discussed in Section 3.1.5 of the Scoped SWS. Detailed discussions related to specific s SWH such as Terrestrial Crayfish will be included in the next Scoped SWS submission following completion of the field program.
	7.2 - Confirm and demonstrate how bat habitat assessments will be included in the scope of work.	Dillon	At this stage, woodland removals have not been proposed. As such, bat habitat assessments have not been proposed since woodlands are anticipated to be protected with an appropriate buffer.
	7.2 – Foundations are not a habitat requirement for the presence of snake hibernacula, nor are surveys for this type of feature often effective without substantial effort. Therefore, the precautionary approach will apply to this type of wildlife habitat.	Dillon	Noted. As a precautionary approach, incidental observations of snakes as well as presence of features that

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			may support snake hibernacula (e.g., bedrock crevices, old wells and or rock/log piles) will be documented during the field investigations.
	7.2 – Provide references for the species status lists being used in this assessment. Also include reference lists for regionally and locally rare species. Rare species observations should be georeferenced.	Dillon	The next submission Scoped SWS will include local rarity status from the Halton Natural Areas Inventory, 2006.
	7.4 – Include policy references that will guide the impact assessment. Remove reference to 'no-net-negative impact', which is not consistent with provincial or regional natural heritage policy. To demonstrate policy conformance, the SSWS will need to demonstrate avoidance of features and/or negative impacts to the system, its components, or ecological functions. A "net" approach implies that a negative impact has occurred, whereas the applicable policy documents require that impacts must not be negative. Until more detailed information is known, the decision to agree in principle to feature offsetting through review of the ToR is premature. Where feature replication is proposed, a robust feasibility analysis would be required to inform decision-making. The appropriateness of feature offsetting will be dependent on many factors, including the feature and function type. At this stage, natural heritage feature offsetting should be avoided. Where proposed, the decision to offset will be at the discretion of the approval authority and will be negotiated before the issuing of Conditions of Approval (i.e., before detailed design commences).	Dillon	The reference to 'no-net negative impact' has been removed. We understand that it is premature to agree to feature offsetting in the ToR, however we have included on our approach to mitigating negative impacts, if required. The proposed NHS has been discussed in Section 5.0 of the Scoped SWS and will be further refined in the next submission following completion of the 2026 field program.
	7.4 – Please update the ToR to include a section for recommendations and establishment of buffers to the NHS, as required through policy and as standard best practice for mitigating negative impacts. Map1G of the ROP includes a 30m buffer. To achieve the goals and objectives of preservation and enhancement of the NHS, the SSWS study should investigate the ecological appropriateness of 30m and make recommendations on	Dillon	The ToR has been updated to note the requirement for a refinement framework based on existing policy, guidelines and standard best management practices within the SSWS.

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	refinements where appropriate. If refinements are proposed, the submissions will need to include a refinement methodology framework for review; please update the ToR as necessary if refinement is anticipated.		Section 5.5 of the Scoped SWS provides a discussion on buffers and setbacks. The next submission of the Scoped SWS will include a buffer refinement framework.
	10 – The environmental monitoring plans should be designed to evaluate the effectiveness of mitigation measures, and to assess the impacts of land use change relative to the documented pre-existing conditions. Please include an overview metrics being considered. The metrics should be relatively simple and informed by existing data. They should be measurable, repeatable, and interpretable and relevant to both short-term and longer-term monitoring (particularly for lands dedicated to public ownership).	All	A detailed monitoring and adaptive management program will be provided in the next Scoped SWS submission following completion of the field programs.
Conservation Halton – Ola Panczyk, Environmental Planner			
	The ToR required updates to incorporate additional technical details which are necessary for confirming the limits of the flooding and erosion hazards, ensuring the hydrologic function of wetlands are maintained, and ensure the stormwater management strategy addresses natural hazards. These details are necessary to evaluate the development proposed under CH's regulatory policies and to evaluate consistency with PPS natural hazards policies.	All	Noted.
	General		
	Recommend including a section which speaks to conformity with applicable legislation, regulations and policies.	Paul Brown	Conformity will be described throughout the SSWS document, where applicable. A detailed conformity exercise has been completed under the Planning Justification Report.
	Recommend including a "Future Studies and Analysis" section which, at a high level, identified what additional work may be required as part of any future Planning Act Applications (e.g. Site Plan) or CH permit applications.	Crozier	Required future studies and analyses are listed throughout the SSWS report.

	1.2 Study Purposes and Objectives		
	The following additional study objectives should be included "Recommend a management strategy for natural features and hazards, including a strategy which prevents, eliminates, or minimizes the risk to life and property caused by flooding and erosion hazards."	Crozier/ Dillon	The requested wording has been added to Section 1.2 of the updated TOR. Management strategy for natural features and hazards will be provided with the next SSWS submission once the field work and detailed studies are completed.
	CH staff understands the Town may request expansion of the study area to include lands to the west. Further updates to the TOR would be required to address an expanded study area (e.g. expansions to hydrologic and hydraulic modeling, flood and erosion mapping, spill analysis, feature stakings, restoration plans, wetlands water balance assessments, etc.).	All	Note. Crozier has indicated to the Town that expansion of the study area is not deemed required based on existing hydrology.
	2.0 Hydrology		
	The text states that there is urban flooding observed downstream of the Site within the Town of Milton and that the study area used for the hydrology analysis will include this flood vulnerable area as a point of interest. Clarify where this flood vulnerable area is and adjust the detailed study area catchment shown on the Proposed Hydrology Study Area Figure to include this area.	Crozier	The detailed study area (dark blue) is the area where we have detailed information for modeling updates. The area downstream of the Site is being reviewed but no changes are being made to the modeling therefore, it is not considered part of the detailed study area. The downstream area being reviewed will be identified in the updated Proposed Hydrology Study Area Figure to be provided with the resubmission.
	Adjust text to read "This model will be updated to reflect more detailed soils, ~~and~~ topography data, **and catchment discretization (as necessary)** within the Site."	Crozier	The noted wording has been updated as requested.

	4.0 Natural Hazards		
	For clarity, update the third sentence in the paragraph to read: "development limits adjacent to valleys are set by the greater of the flooding or erosion **hazard** plus regulatory and erosion access allowances."	GEO Morphix	The ToR has been updated accordingly.
	4.1 Flood Hazards		
	CH's ARL mapping identified a potential spill flood hazard originating from the watercourse and flood plain north of the subject property that may impact a portion of the subject property located west of the watercourse, as well as adjacent lands west of the subject property. If the study area is expanded to include the lands to the west and/or development is planned within the portion of the subject property located west of the watercourse, the ToR should be updated to include a phased approach to evaluate if spill is present and to understand the potential impacts of any spill on the proposed development areas, including: • Extension of the review and update of the 1D hydraulic model through the golf course lands, using the 2023 LiDAR data • Analysis of the updated 1D hydraulic model and golf course topography to determine if a spill is present • Quantification of the spill at its source, if it is present, to determine if it is likely to be hazardous (Reference: CH's 2025 Spill Flood Hazard Policies: Technical Guide) If, based on the analysis, CH determines the spill is likely to be hazardous, further amendments to the ToR will be required (e.g. to reflect how the spill flood hazard will be delineated and other related steps etc.). If the study area is not expanded and/or development is not proposed within the portion of the subject property located west of the watercourse, a spill flood hazard analysis will not be required.	Crozier	Development is not proposed within the portion of the subject property located west of the watercourse. Crozier has also indicated to the Town that expansion of the study area is not deemed required based on existing hydrology. Therefore, a spill flood hazard analysis is not required.

	Text states that the existing peak flows in the downstream flood vulnerable area will be reviewed and investigated only if modeling for this SSWS shows an increase in peak flows in this area. Please clarify what area (the site or the downstream vulnerable area) would trigger the additional review.	Crozier	A flow increase in the downstream vulnerable area would trigger additional review. Downstream impacts are discussed in Section 6.6.1 of the SSWS and in more details in the report included in Appendix C. Wording in the ToR has been updated to provide clarity.
	4.2 Erosion Hazard		
	Add *Conservation Halton Guidelines for Slope Stability Assessments for Valleys.*	Soil Eng	Noted. CH guidelines for slope stability assessments for valleys have been included.
	Include reference to the requirements for the physical top of bank and associated with the valley to be stacked by CH staff.	Soil Eng	Noted. The physical top of bank was staked out by Dillon Consulting Limited with CH Staff on September 19, 2025.
	5.0 Geotechnical and Hydrogeological Condition		
	Integrate the hydrological and hydrogeological components to assess both surface and groundwater interactions supporting wetlands. Collect at least one full season of wetlands-specific monitoring data to appropriately characterize the wetlands (e.g. groundwater levels, inflows/outflows, and precipitation) or provide justification for reduced monitoring duration. Update the ToR as appropriate.	Soil Eng	Monitoring wells and piezometers are to be proposed in the vicinity of the wetlands at the Subject Site, which will be monitored on a monthly basis for a one (1) year period).
	6.0 Water Budget		
	Please be advised that as per CH's current policies, a wetland water balance assessment is required if development (e.g. stormwater outlet, grading, etc.) is proposed within the regulated area adjacent to wetlands. Update the ToR as appropriate and indicate that the wetland water balance assessment will be consistent with *Conservation Halton Guidelines for Wetland Water Balance Assessment*, June 2024.	Crozier	A wetland water balance assessment will be completed if deemed required through the risk assessment. If required, the water balance assessment will be consistent with CH guidelines. This wording has been added to Section 6.0 of the ToR. The water balance assessment will be discussed in the next SSWS

			if required based on the ongoing field program.
	Further to the above, a risk assessment approach may generally be used to help scope any wetland water balance assessments that are required under CH policies for development activities within 30 meters of wetlands. The assessment should define how sensitivity and magnitude of change will be quantified. A risk screening matrix (sensitivity x magnitude of change) should be applied. Update the ToR as appropriate.	Dillon	The wetland risk assessment will be provided with the next SSWS submission once the field program is completed. If required, the SSWS will include a risk screening matrix to be applied.
	Expand the ToR beyond volume matching and infiltration targets to include explicit assessment of seasonal hydroperiods, soil moisture, and vegetation support zones to ensure wetland hydrology is maintained. Use these parameters to assess hydrologic and functional changes and establish quantitative performance thresholds (e.g. +/-10% change in seasonal water balance) to guide mitigation measures if required.	Dillon/ Crozier	Quantitative performance threshold will be determined as part of the next SSWS submission on the field program is completed.
	7.4 Impact and Mitigation Identification		
	CH staff understand that the SSWS will characterize regulated watercourses, natural hazards, and wetlands, and provide comprehensive justification and analysis for any proposed management strategies of those regulated features and areas. Please note that the SSWS will need to be taken to CH's Board of endorsement to enable CH staff to issues permits for implementing the SSWS management strategies for CB regulated features and hazards. The last sentence in the second paragraph should be updated to reflect this process.	Dillon	This section has been updated.
	9.0 Stormwater Management		
	Clarify the difference between the stormwater management criteria and the established targets (e.g. are targets = post to pre for flow vs criteria = m3/s/impervious ha?)	Crozier	Criteria would be post-to-pre; target will be set values established to evaluate the proposed SWM strategy ($m^3/s/ha$). Clarification has been added to Section 9.0 of the ToR.

	Please be advised that at this time, CH does not support the inclusion of rooftop or parking lot controls to reduce flows within downstream regulatory storm flood hazard modeling. Further, inclusion of these types of controls for the non-regulatory storm events in future watershed scale flood hazard mapping studies will be determined at the time of these future studies.	Crozier	Noted.
	9.1 Erosion Mitigation Analysis		
	Confirm that cumulative excess work is the same as cumulative total work in the erosion exceedance analysis.	GEO Morphix	Cumulative excess work consists of the amount of stream power or work above an erosion threshold (i.e. critical discharge), while cumulative total work consists of the amount of stream power or work above and below an erosion threshold. The cumulative excess work index is a better surrogate for sediment transport and erosion potential.
	10.0 Monitoring and Adaptive Management Program		
	Expand the monitoring program to include wetland-specific performance metrics such as water level fluctuations, vegetation composition, and soil moisture. Define adaptive management triggers and actions if targets are not met, and align the monitoring framework with CH's guidelines for long-term effectiveness. Update the ToR as appropriate.	Dillon	A detailed monitoring and adaptive management program will be provided in the next Scoped SWS submission following completion of the field programs.