



**PATERSON  
GROUP**

September 28, 2022  
File: PE5198-LET.04

**Inverness Homes**  
38 Auriga Drive, Suite 200  
Nepean, Ontario  
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Attention: **Mr. Robin Daigle**

Subject: **Development Application Review Comments  
Phase I - Environmental Site Assessment  
28 High Street – Carleton Place, Ontario**

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Dear Sir,

Paterson Group (Paterson) has prepared this letter in response to the Comments issued by the Town of Carleton Place (Municipality) regarding the development application for 28 High Street in Carleton Place, Ontario. The responses addressed herein pertain to the comments regarding the Phase I Environmental Site Assessment prepared for the property by Paterson Group (Paterson).

## **Phase I ESA Comments**

### **Municipal Comment 1**

*Stage 2 Assessment and if required a Remediation Plan will be required as a condition of approval to be submitted prior to the execution of the development agreement. A Record of Site Condition will be required to be produced at the time of building permit submission.*

### **Paterson Response 1**

A Phase II ESA report has been prepared and it is acknowledged that a Record of Site Condition (RSC) will have to be filed with the Ministry (MECP) for the subject development, however, we would point out that a risk assessment-based RSC will be the approach applied to the project, therefore the property will not be subjected to a complete remediation. In a risk assessment (RA) process, an RA pre-submission form (PSF) is submitted to the Ministry for their review. This submission includes the conceptual site model for the Phase II ESA and some calculations using the soil and groundwater data to establish site specific soil and groundwater standards, in addition to the initial development of risk mitigation measures (RMMs) that would need to be implemented into the design of the development. Upon completion of their review, which takes approximately 3 months to complete, the MECP will issue their comments on the PSF, however, there is no mandated response time for them to review the CSM portion. The





follow up review of the RA submission by the Ministry is a much more in-depth technical review and takes a significant amount of time which can be more than 12months. Once the MECP are satisfied with the risk assessment, an RSC is submitted using the data produced from the RA for the Ministry's acknowledgement.

Given the nature of this approach, further discussion should be had regarding the issuance of building permits and the possibility of the issuance of permits on a phased basis to allow the site soils to be remediated and the foundation to be constructed.

### **Municipal Comment 2**

*Confirmation that on-site monitoring wells will be properly decommission prior to construction.*

### **Paterson Response 2**

Acknowledged. Any wells that are not going to be fully excavated during construction will require abandonment by a licenced well driller as per O.Reg.903.

### **Municipal Comment 3**

*Why does the site boundary of Phase 1 ESA not align with the boundary of the proposed development?*

### **Paterson Response 3**

The Phase I ESA boundary aligns with the original site boundary and represents the portion of the site that will be developed for residential purposes. It is our understanding that the area outside of this boundary fronting the river, a significant portion of which is within the flood plain, will not be subjected to any significant development activity. Accordingly, the boundary for the Phase II ESA and RA property areas will be identical to that of the Phase I ESA and will not include the waterfront strip of land (however, please see response to Comment 4 below).

### **Municipal Comment 4**

*Will there be a separate Phase 1 ESA for the parcel of land adjacent to the river?*

### **Paterson Response 4**

The intention for the parcel of land located between the proposed development and the river is to complete a due diligence risk assessment (or HHERA) using the existing Phase II ESA data to address any possible risks to the use of this land. Any risk mitigation measures developed through the HHERA will be incorporated into the development of the overall project lands.

### **Municipal Comment 5**





*Environmental Advisory Committee: It is the assumption of the committee that all recommended Environmental Site Assessments (ESA) starting with the Phase II ESA will be completed prior to development approval. Any soil or groundwater contamination identified must be remediated in accordance with the MOE guidelines for a shallow bedrock site within 30m of a water body.*

## Paterson Response 5

As previously noted, a Phase II ESA report has been prepared and soil and groundwater contamination have been identified, however, the intent is not to carry out a full remediation of the site to the Ministry generic standards, but rather to complete a risk assessment of the property in order to acquire the RSC. While it is not the intent to remediate the soil on site, a significant percentage of the impacted soil will have to be removed from site simply for construction purposes. The standards that will ultimately be applied to the property will be derived from the risk assessment.

## Closure

This report was prepared for the sole use of Inverness Homes. Permission and notification from Inverness and Paterson Group will be required prior to the release of this report to any other party.

We trust that this submission satisfies your current requirements. Should you have any questions, please contact the undersigned.

Regards,

**Paterson Group Inc.**

Mark D'Arcy, P. Eng. QP<sub>ESA</sub>

