

# Attachment-8 Departmental and Agency Comments

Table 1: Departmental and Agency Comments

<b>Respondent</b>	<b>No Objection or Comment</b>	<b>Conditional Support</b>	<b>Issues/Concerns</b>
Planning	N/A	√	N/A
Engineering	N/A	√*	Engineering supports approval of the application provided a holding provision is applied that will remain in place until an updated Phase II Environmental Site Assessment or an independent technical memo is received to the satisfaction of the City Engineer/General Manager.
Landscape Planning	N/A	√*	Comments attached. Does not recommend approval of the proposed 1 metre buffer strip.
Environmental Planning	√	N/A	Note that during Site plan, bird friendly design will be required to mitigate bird collisions with glass and reflective surfaces.
Parks Planning	√*	N/A	Comments attached, to be addressed at building permit stage.
Zoning	√	N/A	N/A
Heritage Planning	√	N/A	N/A
Transit	√	N/A	N/A
Source Water Protection	√	N/A	N/A
Grand River Conservation Authority	√	N/A	N/A
Mississaugas of the Credit First Nation	N/A	√*	Comments attached, requesting that a stage 1 Archaeological Study be prepared.

\*Memo or letter attached

Figure 1: Engineering Comments 1 of 8

# Internal Memo



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Date April 14, 2025  
To **Eric Rempel, Development Planner I**  
From Jason Robinson, C.Tech, rcsi  
Engineering Technologist III  
Service Area Infrastructure, Development, and Environment  
Department Engineering and Transportation Services  
Subject **725 Imperial Road North**  
**OZS24-004**

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An application for a Zoning By-law Amendment has been received from MHBC Planning for the lands municipally known as 725 Imperial Road North on behalf of the owner, 2794767 Ontario Inc. to rezone the subject lands from "Service Commercial" (SC) to a site-specific "Service Commercial" (SC-XX) zone under City of Guelph Zoning By-law (2023)-20790, to permit the development of a six-storey hotel.

The comments below are a compilation from various city staff and departments, and are based on the following plans & reports:

- Functional Servicing and Stormwater Management Design Report – prepared by GEI Consultants Canada Ltd.; dated December 13, 2024
- Groundwater Contour Plan - prepared by GM BluePlan Engineering Limited; dated December 13, 2024
- Site Grading Plan - prepared by GM BluePlan Engineering Limited; dated December 13, 2024
- Site Servicing Plans 1 & 2 - prepared by GM BluePlan Engineering Limited; dated December 13, 2024
- Geotechnical Investigation Report – prepared by JLP Services Inc.; dated August 7, 2024 (revised)
- Technical Memorandum [Subsurface Conditions] – prepared by JLP Services Inc.; dated November 13, 2024
- Phase I Environmental Site Assessment – prepared by JLP Services Inc.; dated February 3, 2023
- Phase II Environmental Site Assessment – prepared by JLP Services Inc.; dated July 31, 2024
- Reliance Letter – Prepared by JLP Services Inc.; dated August 8, 2024

Figure 2: Engineering Comments 2 of 8

- Noise Feasibility Study – prepared by Howe Gastmeier Chapnik Limited; dated January 17, 2025
- Traffic Geometric Plans – prepared by Paradigm Transportation Solutions Limited; dated February 12, 2024
- Registered Application to Consolidate Parcels – WC750944; dated January 31, 2025

## **Development Engineering:**

### **Municipal Services:**

The servicing capacity analysis was completed prior to the application for Zoning By-law Amendment. The results were as follows:

#### Water capacity

The owner proposes to merge the existing hotel site and the proposed hotel site. A new connection to the municipal watermain is not proposed, as service will be provided internally from the existing hotel site after the properties have merged.

The average day demand (ADD) for the development was provided in the Functional Servicing and Stormwater Management Design Report with assumptions of two beds per room, and the maximum day demand (MDD) was calculated based on the peaking factor specified in the City's 2023 Water and Wastewater Servicing Master Plan (WWSMP).

The estimated water demands were not found to significantly impact the existing pressures, and the expected pressures remain within the preferred service pressure range of 50-80 psi specified by the WWSMP.

Fire flow analysis was conducted at two nearby municipal hydrants. Based on the WWSMP guideline of 267 L/s for a duration of 3.5 hours for medium-sized commercial developments within the City, the available fire flow at both hydrants exceed the minimum requirement.

#### Wastewater capacity

The owner proposes to merge the existing hotel site and the proposed hotel site. A new connection to the municipal sanitary sewer is not proposed, as service will be provided internally from the existing hotel site after the properties have merged.

Staff have evaluated the increased wastewater flows resulting from the proposed hotel. Wastewater will flow to the 250mm PVC sewer on Imperial Road North, north of the existing hotel. Sanitary flows are predicted to increase by 1.38 L/s. The additional flows of 1.38 L/s were added as constant flows to the receiving maintenance hole on Imperial Road North, and the existing and projected capacity within the system was considered for wet weather conditions using a 25-year 3-hour storm event.

The model analysis determined that there is no surcharging from the subject site to the Wastewater Treatment Plant (WWTP), which suggests that there is sufficient

### Figure 3: Engineering Comments 3 of 8

capacity available within the City's existing wastewater infrastructure to support the proposed development.

#### **Site Servicing:**

Staff have reviewed the proposed conceptual servicing. New water and wastewater services are not proposed for the site as services will be provided internally from the existing hotel site after the existing hotel site and the proposed hotel site have merged.

#### **Stormwater Management:**

Staff have reviewed the Functional Servicing and Stormwater Management Report. The findings of the report rely on data ascertained as part of the geotechnical investigation. Some of the geotechnical data requires refinement to meet the standards outlined in the Development Engineering Manual (DEM). The Geotechnical Report section of this memo provides more details on the required refinement.

#### Water balance

The water balance criteria is to maintain the pre-development recharge rate under post-development conditions and to provide a minimum of 5mm volume control.

#### **Recharge rate**

The Geotechnical Report and Technical Memorandum do not confirm that the infiltration rate presented in the Stormwater Management Report was determined in accordance with the DEM. The report does not appear to clarify how the presented infiltration rate (5 mm/hr) was selected, and the rate is therefore considered preliminary. A design infiltration rate that has been determined in accordance with the DEM is necessary to adequately assess the site's water balance calculations. The water balance is fundamental to demonstrating that zoning requirements are met (adequate storm service in accordance with Zoning By-law section 4.10). The report should clearly identify the methodology used to select the design infiltration rate.

The report outlines that the annual infiltration volume is 804.9m<sup>3</sup> under pre-development conditions and 308.1m<sup>3</sup> under uncontrolled post-development conditions. The report presents a controlled post-development annual recharge volume of 1,218m<sup>3</sup> which is proposed to be achieved through the inclusion of an infiltration gallery in the design, whereas the calculated recharge volume associated with the infiltration gallery relies on an infiltration rate that has not been determined in accordance with the DEM. Since the stormwater management proposal includes that the recharge criterion is met through use of an enhanced infiltration feature, the approach may not rely on the geotechnical engineer's opinion that permeameter testing will not yield valuable data.

The report asserts that the soils have low infiltration rates whereas section 6.7 of the Geotechnical Report indicates that the soils have relatively high permeability.

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The 'Enhanced Infiltration Structure' calculations provided in Appendix C.4 outline that a 50% infiltration efficacy was assumed for months where the infiltration gallery has less than 1.0 metre of separation from the groundwater, and further identifies those months as May and October, whereas the hydrographs appended to the report and the supplemental readings found in the Technical Memorandum appear to indicate that the groundwater levels logged for BH/MW1 (nearest to the proposed infiltration gallery) provided a separation greater than 1.0 metre for one reading only (November 12, 2024) and were occasionally reported as higher than the proposed bottom of infiltration gallery.

Staff observe that the reported high groundwater elevation at the infiltration gallery (342.29m) appears to be consistent with the Groundwater Contour Map found in the Technical Memorandum but does not appear to be consistent with the data presented in the hydrographs found in the 'Summary of Seasonal Groundwater Monitoring' document appended to the report, or with the Groundwater Contour Plan found in the civil drawing package. Please note that DEM 5.8 defines the high groundwater table as the highest elevation at which there is physical evidence that the soil has been saturated with water, and that the methodology for determining the seasonal high groundwater is to pick the maximum/highest peak value.

DEM 5.7.9 outlines that Low Impact Development (LID) and Green Infrastructure (GI) features are to maintain a 1.0 metre separation from the seasonal high groundwater elevation. Staff acknowledge that the submitted materials report a shallow groundwater elevation on site, and note that designs should strive to meet this requirement to the degree that is reasonably achievable. Staff encourage the owner to explore additional options that may serve in helping to meet the site's stormwater requirements (including but not limited to exploring additional LID and GI features/types, revised site grading, etc.). Types and locations of LID and GI permitted within the City of Guelph are outlined in the Stormwater Management Master Plan, March 2023, Appendix G - LID Implementation Strategy in Table 2.1 and Table 2.2.

The report notes a drawdown time of 1.4 days for the infiltration gallery. In accordance with Ministry of Conservation and Parks' (MECP) Stormwater Management Planning and Design Manual, a 24- to 48-hour drawdown time is acceptable and a 24-hour drawdown time is recommended. Staff recommend designing to achieve a 24-hour drawdown time.

The above comments can be addressed at the Site Plan application.

### **5mm volume control**

The requirement of the criterion is to provide 5mm of volume control, and the general intent is to ensure that stormwater is firstly controlled on site. The report's discussion surrounding this criterion outlines that 4.85mm of volume control is provided by the infiltration gallery, which highlights that the criterion is not met. Additionally, since only roof water is directed to the infiltration gallery for storage, the discussion as presented does not appear to demonstrate that the general intent of the criterion is met.

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However, staff observe that the proposed stormwater management includes a subsurface storage tank, with a controlled release of the stored water through an orifice plate proposed downstream. Stormwater from the easterly portion of the site will be conveyed to the storage tank for controlled release, therefore it appears that expanding the discussion to include the volume control provided by the storage tank, and by the sewer between the storage tank and the orifice plate, could be beneficial.

The above comments can be addressed at the Site Plan application.

### Quality control

Staff have reviewed the proposed stormwater management strategy with respect to quality control and have no concerns.

### Quantity control

Staff have reviewed the proposed stormwater management strategy with respect to quantity control and have no concerns.

### **Grading:**

Staff have reviewed the proposed conceptual grading and have no concerns, other than as stated in the Stormwater Management section where revised site grading was offered as a potential additional option for the owner to explore, with respect to meeting stormwater management requirements.

We note that retaining walls greater than 1.0 metre in height require a building permit.

### **Geotechnical Report:**

Geotechnical information is provided by the submitted Geotechnical Report, the Technical Memorandum, and materials appended to the Stormwater Management Report. While the Technical Memorandum provides supplemental geotechnical data and professional opinions to address earlier geotechnical comments, the Technical Memorandum has not been signed and stamped by a professional engineer as required by the DEM.

Acknowledging that the memorandum provides an opinion that in-situ infiltration testing will not yield valuable data, that opinion appears to be based on the geotechnical engineer's opinion that the use of infiltration galleries for stormwater management may not be feasible due to the presence of shallow groundwater on site. Whereas the civil engineer has proposed an infiltration gallery, and the recharge provided by the infiltration gallery contributes to the site's infiltration requirement, it is essential that the design infiltration rate of soils is determined in accordance with the DEM.

The memorandum further provides supplemental data essential to demonstrating that DEM requirements have been met (for example, providing four seasons of groundwater monitoring), therefore it is essential that the Technical Memorandum is signed and stamped by a professional engineer if it is to be used in support of a development application.

The above comments can be addressed at the Site Plan application.

Figure 6: Engineering Comments 6 of 8

**Environmental Noise:**

The Feasibility Noise Study (FNS) has been reviewed by staff. The report provides a preliminary analysis of the influence of sound levels on the proposed development, and an opinion on the feasibility of the proposed development from a noise impact perspective.

Sounds levels from transportation noise sources and stationary noise sources were considered in the analysis, in accordance with the Ministry of Conservation and Parks' (MECP) NPC-300 and the City's Guelph Noise Control Guidelines (GNCG).

Staff note that section 4.3 of the FNS indicates that CadnaA was used to calculate stationary sound levels, whereas the GNCG indicates that STAMSON should be used. This requirement can be addressed at the Site Plan application stage.

The report outlines that sound level limits are exceeded and asserts that feasible means of mitigating the sounds level exceedances exist. The proposed noise control measures include the use of fixed and sealed windows (ie/ "on building" noise control measures). Staff note that while NPC-300 permits the use of "on building" noise control measures for noise sensitive spaces in a noise sensitive commercial purpose building (such as a hotel), it additionally notes that such measures are permitted under the condition that the noise sensitive land use is classified as a Class 4 area, whereas the report does not recommend that the site be classified as a Class 4 area and staff do not recommend that the site be proposed for Class 4 area classification. City staff and the consultant have previously held discussions regarding the proposed noise control measures, and staff noted that precedent-limiting support could be provided for this approach.

**Environmental Engineering:**

The submission materials included an unaccompanied data table titled "13. Tables 6-9 - GW Results\_low flow\_2" in addition to the previously reviewed Phase I Environmental Site Assessment (ESA), Phase II ESA and reliance letter.

The data table identified that re-sampling with low-flow sampling techniques produced groundwater concentrations that did not exceed the relevant standards. Consequently, the previously reported contaminant levels that resulted in the requirements outlined in the Internal Memo dated October 15, 2024, have been revised in the table to levels that are no longer an indication of concern.

In accordance with the City's Guidelines for Development of Contaminated or Potentially Contaminated Sites (2016), the Owner/Developer will be required to fulfill either of the following conditions prior to approval of zoning bylaw amendment:

- 1) Prepare and submit a revised Phase II ESA that incorporates the new "low flow" analytical results in accordance with the requirements outlined in Section 3.4.2 "Phase Two Environmental Site Assessments". Reliance on the revised Phase II ESA report shall be extended to the City of Guelph via reliance letter.

OR

Figure 7: Engineering Comments 7 of 8

- 2) Prepare and submit an independent technical memo that includes a detailed discussion on the investigation methodology and detailed review and evaluation of the new "low flow" analytical results. The technical memo must be signed by a Qualified Person. Reliance on the technical memo shall be extended to the City of Guelph via reliance letter.

### **Traffic Engineering:**

Staff have reviewed the traffic geometrics plans and have no concerns in the context of this application.

Staff provide the following comments as information only, and in the context of the future site plan application:

For the site plan review process, Traffic Geometric Plans must include details of existing accesses, roadway limits, asphalt pavement width, etc.

The Traffic Geometric Plans dated February 12, 2024, by Paradigm Transportation Solutions Limited notes that the proposed development is a limited-service hotel, and that deliveries are primarily expected to be for breakfast supplies. Supplies would be delivered by a smaller truck at the entrance near the location of the moloks on the easterly side of the building. Staff will be looking to review how the proposed development will facilitate the loading operations as described.

The fire route to the proposed development must be provided in accordance with the Ontario Building Code (OBC) and to the satisfaction of the City's Building Services department.

The detailed design of sustainable transportation features (such as bike parking, electric vehicle parking and pedestrian connections) can be discussed at the site plan stage. Staff will be looking to ensure that the pedestrian connections are accessible, safe and convenient for users. Please note that the City of Guelph Zoning By-law (2023)-20790 includes requirements for bike and electric vehicle parking, and further includes requirements for the provision of both short-term and long-term bike parking facilities within the site.

### **Source Water Protection:**

A Section 59 Notice was issued by the City's Risk Management Official on September 27, 2023, and staff have no further comments.

Figure 8: Engineering Comments 8 of 8

**Staff Recommendations:**

Engineering supports approval of the Zoning By-law amendment application subject to the Holding Provision below. To ensure that the development of the subject lands does not proceed until the following condition is met to the satisfaction of the City Engineer/General Manager:

- 1) The Owner shall provide the City either an updated Phase II Environmental Site Assessment or an independent technical memo as outlined above, and a reliance letter to the satisfaction of the City Engineer/General Manager.

Jason Robinson, C.Tech, rcsi  
Engineering Technologist III  
**Engineering and Transportation Services**  
**City of Guelph**

Mary Angelo, P.Eng  
Manager, Development and Environmental Engineering  
**Engineering and Transportation Services**  
**City of Guelph**

Figure 9: Landscape Planning Comments 1 of 3

# INTERNAL MEMO



DATE October 7, 2024  
TO **Eric Rempel, Development Planner**  
FROM Landscape Planning  
DIVISION Infrastructure, Development and Environment  
DEPARTMENT Planning and Building Services  
SUBJECT **725 Imperial Road North – Proposed Zoning By-law Amendment (OZS24-004)**

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Landscape Planning Staff have reviewed the submitted materials for the above noted applications, including:

- Arborist Report from GSP Group dated April 14, [2023](#);
- Tree Management Plan from GSP Group dated April 14, [2023](#);
- Landscape Plans from MHBC dated March 22, [2024](#);
- Site Plan from Mataj Architects Inc dated December 05, [2023](#);
- Planning Justification Report from MHBC dated March 2024.

It is understood that the application is seeking site specific provisions under the Service Commercial zone, as listed in the Application Form.

## **Comments:**

### Arborist Report and Tree Management Plan

The Arborist Report assessed fifty-six (56) trees in total and provides recommendation for the removal of forty-four (44) trees. Overall it appears that generally:

- The development will result in the removal of all existing trees on the development site.
- The development anticipates the protection of existing trees off site, including those assessed along the east property line. Where trees are proposed for removal along property lines and may have shared ownership, staff note that it is the responsibility of the proponent/Owner to obtain permission from adjacent property owners prior to the removal or injury of these trees.

### Tree Management Plan

Delete old Tree Protection Sign details and only refer to those details and specifications found in the City's Tree Technical Manual (TTM).

### Tree Compensation

Compensation for regulated tree removals is to be calculated using the City's Tree Technical Manual (TTM) Aggregate Caliper Formula. Tree #38 is a cluster of 45 popular stems which range in size from 4 to 14cm. In order to calculate an approximate compensation of regulated trees at this time, this cluster will be calculated at 5 stems equalling 14cm.

Combining all individual trunks of regulated trees noted in the Tree Inventory Chart, and taking into consideration the overall species and health of trees proposed for removal, staff note:

- 21 trees are in poor health or condition or considered dead. These, along with

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- certain invasive species, are exempt from any compensation.
- 37 trunks (29 trees) are in fair, good or excellent condition, equalling 745cm DBH. These are subject to compensation. This equates to 124 new trees at 60mm caliper.

Given the proposed development envelope, I would anticipate compensation will need to be provided partly in the form of new trees on site and cash-in-lieu.

### Landscape Plan

The Plans should look for greater opportunities for tree compensation on the property, especially within required buffers and parking areas - taking into consideration soil quantity and other plantable space requirements of the TTM. There is a total of 30 deciduous and coniferous trees proposed. Where trees share soil volume, a lower volume may be considered however, where landscaped buffer strips must meet requirements for healthy and vibrant tree growth and engineering functions (e.g. bioswales, catch basins), they may be required to be wider than the minimum 3 metres.

Look for opportunities to increase the width of proposed parking islands so that they can host medium sized deciduous trees that can provide shade and combat the heat island effect. One tree should be planted for every 8 parking spaces minimum within the parking field as per the City's Commercial Built Form Standards and Sustainable Development Checklist. Trees may be grouped or evenly spaced throughout surface parking areas. Groupings of trees are preferred to promote sustainable irrigation practices, with a minimum soil depth of 1000mm, or deeper as required to accommodate larger root balls.

The Plans shall incorporate native shrub and perennials in concert with deciduous native trees along the entire frontage of the public street to help screen parking from the ROW. The proposed only indicates trees and includes coniferous trees that should be substituted with deciduous species that help the proposed building better address the street and meet the intent of the CPTED recommendations of the Planning Justification Report.

Green roofs and blue roofs are strongly encouraged. A green roof, blue roof, or combination of both may count towards a maximum of 30% of the total landscaped open space requirement. A green roof allows vegetation to grow on top of a structure. Blue roofs allow for the capture and slow release of stormwater. Both provide environmental benefits and stormwater management.

Landscaping treatments should contribute towards stormwater management (OP Policy 8.1.1). The use of bioswales and low impact development is encouraged. However, these systems should be placed where limited runoff from salt and/or snow storage may occur to reduce the impact to water quality.

### Site Plan

The inclusion of a 3 metre wide buffer strip adjacent to interior side lot lines as per the zoning, is strongly recommended. The proposed provides no opportunity for vegetated screening along the south/ south-west property lines. Though a privacy fence has been proposed around the site to help define the property, the lack of soft landscaping along all boundaries, especially those located adjacent to an expanse of hard surfaces associated with the adjacent fast food parking lot and drive-thru, is highly undesirable and does not help support city sustainability and urban forest policies. Providing a 3 metre buffer along

## Figure 11: Landscape Planning Comments 3 of 3

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the southerly limits of the property provides opportunity for compensation tree plantings that can help shade the building and combat the urban heat island effect.

### Next Steps

Staff do not support the proposed reduction in the interior side yard setback to 1m (rather than 3m). Staff would like to ensure there is greater opportunity to plant medium sized deciduous trees as part of the compensation requirements of this development and to help support the growth of the urban canopy as per the Council approved One Canopy Strategy.

I trust these comments are sufficient please let me know if you have any questions.

Regards,



**Rory Barr Templeton**  
Landscape Planner  
Planning  
**Infrastructure, Development and Enterprise**  
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Figure 12: Parks Planning Comments 1 of 2

# Internal Memo



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Date	October 1, 2024
To	Eric Rempel, Development Planner II
From	Tiffany Hanna, Park Planner
Service Area	Public Services
Department	Park and Trail Development
<b>Subject</b>	<b>Official Plan Amendment and Zoning By-law Amendment for 725 Imperial Road North</b>  <b>OZS24-004</b>

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Park and Trail Development has reviewed the application for the above noted proposed Zoning By-Law and Official Plan Amendment including the Notice of Complete Application and Public Meeting dated September 5, 2024 and offers the following comments:

## **Zoning Bylaw Amendment and Official Plan Amendment:**

The purpose of the Zoning By-law Amendment application is to rezone the subject lands from "Service Commercial" (SC) to a site-specific "Service Commercial" (SC-XX) zone under City of Guelph Zoning By-law (2023)-20790, to permit the development of a six-storey hotel.

Park and Trail Development has no objection to the proposed Zoning By-Law to permit the development of a six-storey hotel.

## **Parkland Dedication**

Park and Trail Development recommends payment in lieu of conveyance of parkland for the development. This will be payable prior to the issuance of a building permit.

The amount of payment in lieu of parkland conveyance will be calculated at a rate of 2% of the appraised property value in accordance with subsections 17.(a) and 3.(k)iii of the City of Guelph's Parkland Dedication By-law (2022) 20717 as amended by By-law (2024)-20860.

The Planning Justification Report identifies that 8,060 square metres of the site is to be redeveloped.

Please delineate on the site plan the portion of the property that is impacted by the proposed development as per Section 3.(k)iii of the City's Parkland Dedication Bylaw (2022) 20717 as amended by By-law (2024)-20860. Please also provide the area in hectares so that the cash-in-lieu of parkland dedication amount can be calculated.

## Figure 13: Parks Planning Comments 2 of 2

A narrative appraisal report of the subject property will be required to determine the Payment in lieu of Parkland amount, prior to submission of any building permit applications. As per Section 21 of Bylaw (2022) 20717 as amended (2024)-20860, the appraisal is only considered valid for one (1) year. The appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada. The property owner is responsible for the cost and to arrange for the appraisal. We recommend submitting the appraisal two months ahead of the building permit application to avoid delays.

The amount of cash in lieu of parkland dedication will depend on the details of the approved development, parkland dedication rate in effect at the time of the issuance of the first building permit and the estimated market value of the land a day before issuance of the first building permit.

### Conditions of development

I recommend the following development approval conditions:

1. The Owner shall be responsible for **payment in lieu of conveyance of parkland** to the City to the satisfaction of the Deputy CAO of Public Services or their designate, pursuant to s. 42 of the Planning Act and in accordance with the City's Parkland dedication By-law (2022) 20717 as amended by By-law (2024)-20860 or any successor thereof, prior to issuance of any building permits.
2. Prior to the issuance of the first building permit, the Owner shall provide to the Deputy CAO of Public Services or their designate, **a satisfactory narrative appraisal report** prepared for The Corporation of the City of Guelph for the purposes of calculating the amount for payment in lieu of conveyance of parkland pursuant to s.42 of the Planning Act. The value of the land shall be determined as of the day before the day the first building permit is issued. The narrative appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada and shall be subject to the review and approval of the Deputy CAO of Public Services or their designate.
3. Notwithstanding the foregoing, if the narrative appraisal provided by the applicant is not satisfactory to the Deputy CAO of Public Services or their designate, the City, acting reasonably, reserves the right to obtain an independent narrative appraisal for the purposes of calculating the amount for payment in lieu of conveyance of parkland.

### Summary

The above comments represent Park & Trail Development's review of the proposed development. Based on the current information provided, I would support the proposed development subject to the conditions outlined above.

Regards,

Tiffany Hanna, Park Planner  
Parks, **Public Services**

T 519-822-1260 x 3371  
Tiffany.hanna@guelph.ca

Figure 14: Mississaugas of The Credit First Nation Comments



September 6, 2024

Eric Rempel  
Planner 2- Development Planning  
City of Guelph

RE: 725 Imperial Road North, Guelph

Dear Eric,

The Mississaugas of the Credit First Nation (MCFN), Department of Consultation and Accommodation (DOCA) submit the following comments:

The Mississaugas of the Credit First Nation hereby notify you that we are the Treaty Holders of the land on which the development of six-storey hotel will be taking place. This project is located on the Between the Lakes Treaty No. 3, of 1792.

Therefore, the MCFN Department of Consultation and Accommodation (DOCA) requires that we be in receipt of all Environmental Study reports and that a Stage 1 Archaeological Study be conducted on the site to determine its archaeological potential and further that the Stage 1 report be submitted to MCFN DOCA for review. If it is determined that a Stage 2 is required, MCFN DOCA is expected to be involved in the field study with MCFN Field Liaison Representation (FLR) on-site participation. This study will be at the cost of the proponent.

Thank you

Abby (LaForme) Lee  
Consultation Coordinator, MCFN DOCA- [Abby.LaForme@mncfn.ca](mailto:Abby.LaForme@mncfn.ca)

Cc: Mark LaForme, Director, MCFN DOCA – [Mark.LaForme@mncfn.ca](mailto:Mark.LaForme@mncfn.ca)  
Cc: Craig King, Consultation Manager, MCFN DOCA- [Craig.King@mncfn.ca](mailto:Craig.King@mncfn.ca)



**DEPARTMENT OF CONSULTATION AND ACCOMMODATION**  
Mississaugas of the Credit First Nation  
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