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March 31, 2022
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Attention: Sarah Dilamarter, Junior Planner
Municipality of Trent Lakes
760 Peterborough County Road 36
Trent Lakes, ON K0M 1A0

Dear Sarah Dilamarter,

Reference: Peer Review – Phase One Environmental Site Assessment - 16 Fire Route 94A, Trent Lakes (Bobcaygeon), Ontario

Stantec Consulting Ltd. (Stantec) is pleased to provide the Municipality of Trent Lakes (the “Client”) this peer review of the following report:

Phase One Environmental Site Assessment, 16 Fire Route 94A, Trent Lakes (Bobcaygeon), Ontario, Report No.: 5255W-20-EA, dated September 9, 2020, prepared by Toronto Inspection Ltd. (TIL), for 11923811 Canada Inc., (herein referred to as the “Phase One ESA”).

The purpose of the peer review is to review the Phase One ESA for general compliance with the requirements of Ontario Regulation 153/04, Records of Site Condition – Part XV.1 of the Environmental Protection Act (O.Reg. 153/04), identify data gaps, and provide an opinion on the Phase One ESA findings.

PHASE ONE ESA SUMMARY

The following is a brief summary of the information presented in the Phase One ESA:

- The Phase One ESA was conducted for a property located at 16 Fire Route 94A in Trent Lakes (Bobcaygeon), Ontario (herein referred to as the “Site”) in support of a Site Plan Approval by the Municipality of Trent Lakes.
- According to TIL, the Phase One ESA was conducted in general accordance with O.Reg. 153/04.
- The stated objective of the Phase One ESA was to determine if there is evidence of actual or potential contamination as a result of the current and/or previous historical activities on-Site or the surrounding properties that could result in an adverse environmental impact to the Site.
- The Site is irregular in shape, with a reported approximate area of 6,820 m², and includes two small islands.
- According to TIL, the first evidence of development was identified from a 2009 aerial image when at least 10 cabins were observed on the aerial at the Site.

Reference: Peer Review – Phase One Environmental Site Assessment - 16 Fire Route 94A, Trent Lakes (Bobcaygeon), Ontario

- The surficial geology, as described in the Phase One ESA report, is Bedrock-drift complex in Precambrian terrain. The bedrock geology was described as consisting of mafic to felsic metal volcanic rock flows, tuffs, breccias, minor iron formation, minor metasedimentary rock of the amphibolite Grenville Supergroup and Flinton Group.
- A waterbody identified as Pigeon Lake surrounds the Site to the east, south, and west. Based on the topography and location of Pigeon Lake relative the Site, TIL inferred that the local groundwater flow was in different directions towards Pigeon Lake.
- At the time the Phase One ESA, TIL was not able to obtain city directories and fire insurance plans for the Site and Study Area (area within 250 m of the Site) due to the closure of government buildings as a result of the COVID-19 pandemic.
- A chain of title was completed for the Site from Crown Patent in 1834 to 2020. The chain of title indicated that the Site was mostly owned by various private individuals until 1984 when it was transferred to 564259 Ontario Limited and then to Global Land Bank Inc. in 2006. In 2010, the Site was transferred to a private individual and then to the current owner, 11923811 Canada Inc. in 2020.
- TIL identified that the Site was located within a Natural Heritage System and within a highly vulnerable aquifer which is used by the Municipality of Trent Lakes as a drinking water source.
- A signed plan of survey, dated February 18, 2002, was provided in the Phase One ESA report, which included the Site and lands to the north of the Site.
- At the time of the site visit conducted in June 2020, TIL observed the Site to be vacant with 6 cabins along the western portion of the Site in various states of disrepair indicating the cabins were likely constructed well before 2009. TIL was unable to access the two islands that are included as part of the Site, though TIL was able to observe the islands from a distance. An area where vegetation had recently been removed was observed at the Site.
- TIL observed two septic systems at the Site at the time of the site visit. Photographs in the Phase One ESA report identified two septic tanks that were exposed at the ground surface.
- TIL indicated that there was no evidence of the presence of special attention items at the Site, including polychlorinated biphenyls (PCBs), asbestos-containing materials, lead and other substances.
- The Phase One ESA report concluded that historical and current activities from on-Site and off-Site properties did not represent significant potential environmental concerns which may adversely impact the subsurface conditions of the Site.
- It was TIL's opinion that no further investigation was required for the Site.

COMMENTS

Stantec generally concurs with the report findings that no significant potential environmental concerns were present at the time of the Phase One ESA which may adversely impact the Site.

Reference: Peer Review – Phase One Environmental Site Assessment - 16 Fire Route 94A, Trent Lakes (Bobcaygeon), Ontario

Stantec notes that there are some requirements under O.Reg. 153/04 that were not met for the Phase One ESA completed by TIL, including:

- A current (within the last 5 years) certified plan of survey. The plan of survey provided in Appendix F of the Phase One ESA report is dated February 18, 2002 and is over 20 years old.
- Review of a series of aerial photographs that illustrate the period from first developed use to the time of the Phase One ESA and rationale for the time period between aerial photographs used. The earliest aerial image reviewed was for the year 1954, followed by an aerial image for the year 2009, representing a 55 year gap. Rationale was not provided for this time gap, which made it difficult to establish the timing of the first developed use.
- A response to the Freedom of Information request to the Ministry of the Environment, Conservation and Parks (MECP) for environmental records related to the Site. This, together with the results of insurance plan records and city directory searches, had not been received at the time of reporting.
- An updated Phase One ESA completed within the last 18 months. The Phase One ESA work was completed in August 2020 and the report is dated September 2020; therefore, it is marginally over the 18-month currency requirement.
- The two islands that are part of the Site were not accessed during the Site visit conducted by TIL. Therefore, a portion of the Site has not been fully assessed.

It is Stantec's understanding that the Phase One ESA was conducted in support of a Site Plan Approval by the Municipality of Trent Lakes and not for a Record of Site Condition (RSC). As such, the above deficiencies are not required for legal purposes. For due diligence purposes, however, Stantec recommends the following:

- TIL should be contacted to inquire if a response to the MECP request made at the time of the Phase One ESA, and results of insurance plan and city directory searches, have now been received.
- Aerial images between 1954 and 2009 should be reviewed and documented for completeness of information and to better establish the time of first developed use.
- TIL or the site owner should confirm the reason for the removal of vegetation observed at the time of the site visit by TIL.
- The rationale for assuming that no potential environmental concerns are present at the two islands forming part of the Site should be provided in the report, since these islands were not accessed during the site visit.

CLOSURE

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Reference: Peer Review – Phase One Environmental Site Assessment - 16 Fire Route 94A, Trent Lakes (Bobcaygeon), Ontario

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Should additional information become available which differs significantly from our understanding of conditions presented in this report, Stantec specifically disclaims any responsibility to update the conclusions in this report.

We trust that this review meets your requirements. Please do not hesitate to contact the undersigned should you have any questions or comments.

Regards,

Stantec Consulting Ltd.

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