



Date: February 17 2026

File: 051325 - Stones Lake Resort and Spa

To: Township of Greater Madawaska

RE: RESPONSE TO RECEIVED PUBLIC COMMENTS

The following presents our responses to the summary of public comments that have been received both during circulation, some identified online, as well as those presented at the Public Meeting held February 12, 2026.

The comments have been grouped into categories in order to organize our team responses.

PUBLIC COMMENTS AND RESPONSES

Engineering, Grading, and Stormwater

- [Contradictory slope data between two reports caused some concern about high-risk of infrastructure failure, flash runoff hazard, and potential downstream lake contamination if stormwater systems fail.

Response:

The grading data discussed in the Environmental Impact Statement report references the high point identified and the low point identified, but a site's high and low points do not specifically convey grade. A high point can be a very distinct elevation point that drops rapidly as opposed to gradually. In the case of this specific site, the elevation data indicates that the site is, for the most part, relatively flat. The stormwater management plan is based on accurate topographic data and reflects the flow paths within each catchment.

Water Supply, Sanitary, and Lake Impacts

- [Studies required for water usage of lake
- [Concern re. Stones Lake for drinking water while discharging stormwater into it.
- [Fisheries assessment?

- [Septic system scale concerns: Risk of failure or overflow from a large septic system serving a hotel, spa, cabins, shops, and distillery.
- [Evidence of compromised groundwater already present (high bacteria levels).

Response:

Any long-term groundwater or surface water taking greater than 50,000 litres per day requires a Permit to Take Water from the Ministry of the Environment, Conservation and Parks (MECP). Obtaining a permit involves a formal regulatory process with strict technical requirements. As part of that process, we will be working closely with the Township's technical reviewer and with MECP staff to complete a comprehensive investigation, including:

- *A water balance for the lake*
- *Groundwater level monitoring*
- *Pumping tests*
- *Assessment of nearby wells*
- *Interviews / surveys of nearby water users*
- *Evaluation of lake water levels, aquatic habitat, and cumulative impacts*

These studies will capture seasonal conditions and provide an understanding of how the groundwater and surface water systems respond to pumping.

It is also important to emphasize that any permitted water taking will be subject to conditions enforced by the MECP. These conditions include contingency and mitigation measures. For example, if lake levels fall below an acceptable threshold, the Permit holder would be required to reduce or stop taking water. Where appropriate, thresholds will be defined during the technical studies to mitigate potential impacts to other water users and the environment.

With regards to the 'bacteria' detected' in one of the groundwater samples collected as part of the due diligence hydrogeological assessment. The heterotrophic plate count (HPC) was reported to be >2000 CFU/100mL. It is important to note that HPC is not a health-based standard and is not used to assess microbiological safety of groundwater. HPC microorganisms are common, naturally occurring environmental bacteria found in soil, groundwater, plumbing systems and biofilms and is often used to identify and assess biological activity or biofilm growth in distribution systems. Total coliform and E.coli in both groundwater samples were reported to be non-detectable, which are the health-related bacteria indicator species.

Primary fisheries impacts pertaining to this project are associated with the road entrance that crosses over a known watercourse, not the lake. This component is planned to be addressed at the detailed design phase (as indicated in the Environmental Impact Statement). Additional potential impacts from water taking activities in Stones Lake can be added to our DFO inquiry but we suspect the impacts will be minimal and not require fisheries act authorization (FAA).

The site is not planning to utilize a septic system as this is not a residential application. For this type of project a private sanitary collection system is utilized where sanitary is collected via piping, gravity fed to a controlled sanitary treatment system where the sewage is fully treated to ministry standards allowing it to be discharged back into the natural environment.

Furthermore, there are also provincial requirements for stormwater quality and quantity control. Stormwater is required to be cleaned to 80% TSS (meaning 80% total suspended solids removal). This is done through grit separators, sand filters, etc. Lastly, bacteria levels can be found in any well and water purification systems are common. In this case, any treatment of the water will be required if necessary.

Wetlands and Environmental Protection

- [Development encroaches on wetlands with building envelopes constrained close to water.
- [Failure to respect standard 30 m wetland buffer; construction equipment would likely damage wetlands.
- [Regulatory liability shifted to Council due to reduced provincial oversight (Bill 23).
- [Rezoning considered premature without final conservation authority approvals.
- [Increase Environmental Protection through larger setbacks and additional Environmental Protection zones.

Response:

All wetland areas have been documented and the required 30 metre setbacks provided for in the plan. Fencing is required to be put up on the setback boundary to prevent construction disruption within the 30 metre setback areas. The building locations are not final and exact and are permitted to shift to provide adequate construction space outside of the 30 metre setback.

Stormwater management has come a long way and can be controlled to protect against flooding to the 100 year level flood events.

Ministry approvals never occur prior to zoning amendments. A zoning amendment is a higher-level approval reflecting overall support through policy and high-level / conceptual review of supportability. Detailed reporting and approvals and permits occur

as part of Site Plan Control, through Site Plan Control Conditions, and Permits through the Ministry of the Environment, Conservation, and Parks.

The subject property and the proposed development limits are not within the MVCA watershed nor any other conservation authorities watershed and therefore are not beholden to the regulations of the Conservation Authorities Act and are not required to obtain a Section 28 permit. For this site, MECP regulations apply.

In this particular case, due to the more complex nature of the site, holding provisions are being utilized for the specific intended purpose within the Planning Act of Ontario, which is to restrict development of the zoned site until all the serviceability of the site is verified and supported through detailed studies.

It is noted that a 30 metre setback is the applicable standard across the Province of Ontario and that only an Environmental Impact Statement can determine alternate setback distances. The report that was prepared did not propose a greater setback and so no greater setback is recommended. Further, there is no requirement to rezone lands within the 30 metre setback as the 30 metre setback requirement is already a no-build zone.

Species at Risk

- [Presence of Blanding's Turtle habitat and migration corridor on-site.
- [Mitigation measures inadequate, addressing only construction, not permanent resort traffic.
- [Permanent roads and traffic create a mortality sink, conflicting with species-at-risk protections.

Response:

Turtle basking surveys have been completed for the subject property and no occurrences of Blanding's turtle (BLTU) were identified. Under the current ESA regulations, only habitat with a confirmed occurrence of BLTU are protected with a 30m setback as we no longer apply Categorized habitat protection for the species. Despite not identifying the species during site works, the proposed development footprint is respecting the 30m wetland setbacks provided, ensuring indirect impacts to turtles are mitigated. Additional mitigation measures at detailed design i.e. oversized culverts at the roadside for wildlife passage and permanent turtle exclusion fencing, may be implemented at detailed design.

Turtle fencing, as noted, can be utilized as part of detailed design and has been used in many developments to protect habitats from encroachment by pedestrians, vehicles, or other traffic.

Archaeology

- [Assessment area was artificially restricted to immediate impact zones.
- [Blasting and septic work may expand disturbance zones, increasing risk of uncovering artifacts.
- [Cost-saving limitations could result in irreversible heritage loss.

Response:

Provincial law requires that if artifacts are uncovered during work, all activity must cease and the artifacts can only be removed by a licensed archaeologist. A Stage 1 and Stage 2 Archeological Report was provided in accordance with their professional regulations. The report concludes that no further study is required for the development impact areas. The report also specifies compliance with legislation for the report and for construction activities.

Fire Safety and Emergency Services

- [Height and density mismatch with rural infrastructure.
- [Insufficient water pressure (52 PSI deficit) to fight fires in a 12-storey-equivalent building.
- [No dedicated fire pump house or large cistern included in plans.
- [Potential financial burden on taxpayers if emergency infrastructure upgrades are required.

Response:

As clarified at the public meeting, the proposed building is planned to be 24 metres tall and 5 storeys. The proposed building is intended to be sprinklered. Taller buildings are all not accessible by fire trucks and therefore utilize sprinkler systems as fire suppression methods. Fire suppression requirements are to be captured as part of the Site Serviceability Report in the holding provision to ensure that there is adequate water with redundancy for fire suppression and fire fighting. Fire pump house and or cisterns are not shown on Zoning level site servicing plans as these details are not known.

The proposed development will incur high taxes on the site which will in turn support existing services in the community. The creation of jobs will also support retention of population, which can correlate to more housing and therefore a broader tax base as well. In summary, while the Stones Lake Resort & Spa will utilize infrastructure, it will support the system through higher taxes which is the intent of the taxation system, for larger sites and certain uses paying higher taxes for this purpose.

Land Use Compatibility / Scale

- [Over-intensification: City-scale resort proposed for a rural, environmentally constrained site.
- [Incompatibility with existing rural character and infrastructure capacity.
- [Risk of setting precedent for urban-density development without urban services.

Response:

The proposed development at 5 storeys is one storey higher than Calabogie Peaks and is intended to be designed to integrate and respect the natural landscape as that is the vision for the project, to have a wellness escape and accommodation that reflects both the history and the landscape of the area.

As for the total number of units overall. This has been reduced since the first conceptual iteration of the project from 210 to 180 and furthermore, the Servicing Study will specifically determined the total number of units that can be proposed sustainably. A Zoning Amendment application is not intended to specify the number of units for a proposal only the appropriateness of the use or uses.

Noise Concerns re Calabogie Motorsports Park

- [Need for formal noise compatibility protections due to proximity to an established motorsports facility.
- [Requests for: Class 4 Noise Area

Response:

Applicant has experience with Class 4 applications and a holding provision has been added to require a noise study to determine requirement of classification of Class 4 Noise Area as defined under the NPC-300. A Class 4 Noise Area will only be applied should the study warrant it.

Process, Transparency, Municipal Protection

- [Public notice and time to review extensive technical documentation.
- [Perception of rushed or unfair process.
- [Concern re. reports prepared as retained by applicant, request for third party reports
- [Concern related to protection of the municipality on viability of project

Response:

As indicated at the Public Meeting, all provincial legislative timelines and processes have been followed. Reports that require peer review have been peer reviewed and

responses to peer review comments, where necessary, are being required to be addressed as part of the Holding Provisions. Despite there being no legislative requirement for further public meetings as part of the Site Plan Control process, the applicant is committed to an engaged and informed process and will be holding an applicant-led public meeting during the Site Plan Control Process.

It is standard practice of all development applications for the applicant to pay for the required studies that are necessary for an application under the planning act. However, all professional disciplines: architects, engineers, environmental biologist, license archaeologists, land use planners are governed by their own disciplines and accreditation bodies which provide them with their license or accreditation. There are various legislative rules to preparing documentation as well as governing ethics for disciplines. In summary, professionals are not biased to prepare supportive reports for the applicants who have retained them. Professionals are paid regardless of the outcome of the report itself.

As for protection of the municipality related to the viability of the project, this is not an authorized ability of municipalities under the Planning Act and Greater Madawaska is not required nor permitted to request that an applicant prove their financial ability to support the project. However, it is noted that it is typical once a Site Plan Application is approved that the infrastructure and landscaping costs are itemized and the applicant is required to prepare a "Letter of Credit"

Property, Recreation and Community Impacts

- [Loss of lake privacy and character.
- [Increased boating, pollution, and security concerns.
- [Potential public boat access increasing trespass and theft risk.
- [Downstream impacts affect the broader watershed, not just immediate neighbours.

Response:

The proposed vision for the Stones Lake Resort & Spa is to establish a destination that is a complement to the naturalized setting, utilizes natural materials, incorporates Calabogie history, and maintains the serenity of the lake as a 30 m setback is provided to the lake for the spa and the proposed hotel is notably further back from that point. There are no proposed recreational activities to be associated with the lake. This is entirely by design. As an example, there is a nordic spa in Tremblant that is located between a highway and a lake. The lake is not utilized recreationally but only as a visual amenity and that is the same in this case.

On the matter of community impacts and downstream watershed issues, as noted previously, clear reporting and ongoing monitoring is required for use of the lake from an intake of surface water perspective governed by the Ministry of the Environment,

Conservation, and Parks. There are strict regulations in place to protect downstream impacts.

SUMMARY

All comments have been listened to and documented and discussed internally. The majority of comments are related to the preservation of the natural assets of the area, specifically the environment and the lake. As noted, detailed reporting and approvals and monitoring are required in order to support the proposal. However, zoning amendments are intended to support a proposed use not specifically a detailed plan. Detailed plan approvals is what Site Plan Control is for. In order to allow for adequate protection of the elements supported in the Official Plan and the Provincial Planning Statement, holding provisions as permitted under the Planning Act, are being included in order to ensure the required detailed documentation is provided prior to any development proceeding. This allows council oversight on the detail components necessary to support the proposal.

Yours truly,



Christine McCuaig, RPP MCIP M.PI

Principal Senior Planner + Project Manager

CC: Rick Rump, Stones Lake Resort & Spa

Heather Crawley, Stones Lake Resort & Spa