

RESPONSE TO 1ST TECHNICAL COMMENTS

621 DUNDAS STREET EAST, BELLEVILLE

1

March 12, 2025

Mr. Thomas Deming

Senior Principal Planner, Approvals
Engineering and Development Services
Corporation of the City of Belleville

Via email: tdeming@belleville.ca

**RE: 621 Dundas Street East, Belleville
Response to 1st Technical Circulation Comments
Zoning By-law Amendment and Draft Plan of Subdivision**

Dear Mr. Deming,

Fotenn Planning + Design is pleased to submit this letter and supporting documentation on behalf of 2255718 Ontario Inc. for the property municipally known as 621 Dundas Street East in the City of Belleville. This letter provides responses to the technical comments provided by City staff.

Please refer to the following documents, submitted in support of this letter:

- / Revised Concept Plan;
- / Revised Draft Plan of Subdivision;
- / Revised draft zoning by-law;
- / Revised Functional Servicing Report;
- / Revised Traffic Impact Study;
- / Resubmission Cover Letter; and,
- / Updated Civil Binder.

Technical Comments

Technical comments received from the City are bulleted, with our responses listed below each item in bold.

Planning

Block A

1. Need height confirmed – Planning Justification Report says 27 m, elevation drawings show just over 28 m.

The building is 23 metres measured from grade to the roof deck. Please note that the mechanical penthouse, which encloses the roof stairs, elevator, and mechanical equipment, is not included in the height calculations although it is shown on the architectural building elevations. As per Section 15.23 of Zoning By-law 2024-100, the definition of building height excludes mechanical penthouse features (i.e.: elevator and stair overrun, HVAC equipment, etc.). As such, no amendment to the maximum building height of 27 metres in the R3 Zone is required.

2. This will impact landscaping requirements as 27 m is the max height for mid-rise multi-unit dwellings

Per the response above, the apartment is classified as a mid-rise, multi-unit dwelling, therefore there are no impacts to the landscaping requirements as outlined in the submission.

3. 2 m front and exterior side yard is concerning, based on the 28 m height that is a reduction of 85.71%. Based on the former ZBL, it is still a reduction of 81%. Considering this is the main entry point to the subdivision, a greater setback is desired to enhance sightlines. In addition, as noted below, parking on the block exceeds what is required so there should be room available to move the building back a bit. If you could reference some other municipalities that permit this shallow of a front/exterior side yard depth outside of a downtown area for apartment buildings then we could review that.

The decreased setback is intended to contribute to a sense of place and provide a more active pedestrian interface on the streetscape. The building setback has been increased from 2m to 4m, thus still requiring a site-specific amendment. A 4.5 x 4.5m daylight triangle has been accounted for in the subdivision layout, plus an additional setback of 4.7 metres to the nearest corner of the building at the intersection.

4. 6.0 m rear yard not required, 7.5 m is met

Please refer to the revised zoning by-law as the 7.5m rear yard setback is being maintained.

5. Will amenity space be provided? Roof top? Indoor?

Amenity space will be provided in compliance with the provisions of the proposed site-specific zone. The location, size, function, etc. of the amenity space will be determined through future detailed design. It has been confirmed that the buildings are able to accommodate the required amenity area through a mix of indoor, private balcony, and rooftop amenity. These details would be determined at the appropriate detailed design stage through the Site Plan Control process.

6. Landscaping (45% required for high-rise over 27 m, 40% required for mid-rise) Is this met?

The revised concept plan is compliant with the landscaped open space provision of 40%, as reflected in the revised zoning by-law text. As discussed above, the proposed 7 storey buildings fall within the definition for a mid-rise building.

7. Max driveway entrances? (2 max, as per ZBL and driveway control by-law)

Please refer to the revised concept plan as a driveway entrance has been removed. Two (2) driveway entrances are proposed.

8. Parking exceeds requirements (175 required, 211 proposed)

Please refer to the revised concept plan, which reflects a minimum ratio 0.75 spaces per dwelling unit with an addition 0.2 spaces per dwelling unit for visitor parking. The revised concept plan proposes 201 parking spaces, reflecting projected resident needs, given the location of the site. There is no maximum parking provision within the zoning by-law.

9. Parking aisle width (6.4 m required, no special provision required with 2.7 m wide space)

The revised concept plan is compliant with the parking aisle width provisions of the new zoning by-law, as reflected in the revised zoning by-law text.

10. No accessible parking spaces or bicycle parking stalls shown

Accessible parking spaces and bicycle parking will be provided in compliance with the provisions of the proposed site-specific zone. A total of seven (7) accessible parking spaces have been provisionally shown on the revised concept plan.

Block B, F + G

11. 2 m front and exterior side yard is concerning (73.33% reduction) Why is this requested for Blocks F & G?

Please refer to the revised concept plan and revised zoning by-law text, as a reduced front yard setback of 4.5 metres is proposed. A reduction to front yard depth is proposed to reflect an active streetscape and contemporary sense of place within the community.

12. 6.0 m rear yard not required, 7.5 m is met

Please refer to the revised zoning by-law as the 7.5m rear yard setback is being maintained.

13. Blocks exceeds parking requirements

Block B: 76 required, 96 proposed;

Block F: 69 required, 86 proposed;

Block G: 92 required, 125 proposed.

Please refer to the revised concept plan, which indicates the minimum required parking requirements for each block. The revised concept plan may reflect additional parking to reflect the projected needs of residents given the location of the site. There is no maximum parking provision within the zoning by-law.

14. No accessible parking spaces or bicycle parking stalls shown

Accessible parking spaces and bicycle parking will be provided in compliance with the provisions of the proposed site-specific zone. These details would be determined at the appropriate detailed design stage through the Site Plan Control process.

15. Decks and porches at or lower than 1.2 metres above grade: Block B: Decks/porches may project up to 1.5 metres into a front yard but no closer than 2.0 metre from any front lot line.

Please refer to the revised concept plan as decks and porches project a maximum of 1.5 meters into a yard.

16. Landscaping (40% required)

Please refer to the revised zoning by-law text and concept plan as the proposed is compliant with the landscaped open space provision.

17. Will amenity space be provided?

Amenity space will be provided in compliance with the provisions of the proposed site-specific zone. It has been confirmed that the buildings are able to accommodate the required amenity area through a mix of private and communal indoor and outdoor areas. These details would be determined at the appropriate detailed design stage through the Site Plan Control process.

Block C, E + I

18. Maximum height for one-unit towns is 12 m not 13.5 m

Please refer to the revised zoning by-law text as an amendment to this provision is requested to permit a maximum building height of 13.5 metres for a townhouse dwelling.

19. Parking aisle width (6.4 m required, no special provision required with 2.7 m wide space)

The revised concept plan is compliant with the parking aisle width provisions of the new zoning by-law, as reflected in the revised zoning by-law text.

20. Block E exceeds parking requirements

Please refer to the revised concept plan, which indicates the minimum required parking requirements for each block. The revised concept plan may reflect additional parking to reflect the projected needs of residents given the location of the site. There is no maximum parking provision within the zoning by-law.

Block D + H

21. Rear yard reduction from 7.5 to 6 is minor

Noted.

22. Further reduction to 3 m when abutting OS Zones may cause problems with encroachment – that is a very small backyard which will limit accessory buildings (i.e. garden sheds)

Please refer to the revised site plan as the minimum rear yard has been increased. The reduction to the rear yard is required to reflect environmental constraints on the peninsula lands. Those with a smaller rear yard have been designed to feature larger side yards to accommodate amenity space and provide an opportunity for accessory buildings, such as sheds. The environmentally protected lands to the rear of the lot will be maintained as open space/environmental protection lands in perpetuity and will not generate compatibility concerns, such as overlook.

23. 6.0 m rear yard not required for Block D, 7.5 m is met

Please refer to the revised site plan and draft zoning by-law as this amendment is no longer proposed.

Transportation and Operation Services

24. The Environmental Study does not have negative impacts on the development but does show there are significant impacts on the Open Spaces and wetlands that have not been remediated does cause concern potential health and safety concerns.

The wetlands and adjacent open space lands are intended to be maintained as environmentally maintained lands in perpetuity and zoned accordingly. No new development is proposed on these lands, therefore there is no anticipated concern for public health and safety.

25. This Draft Plan of Subdivision plan does not identify the lines of separation between Blocks K, O, and N, as shown in the development blocks. The parkland dedication shall be provided with clear boundaries, and the flood levels shall not be included in the Parkland dedication equation.

Please refer to the revised draft plan of subdivision. Block J will serve as the parkland dedication for the proposed development and is outside of the flood levels

26. The City of Belleville's position remains unchanged as the land, identified as Blocks K, and O, poses a significant liability to the corporation and its residents presently and in the future.

These blocks are intended to be maintained as environmental protection lands and are not included within the developable area of the subject lands. Therefore, there is not an anticipated concern for public health and safety.

27. The City shall require any parkland dedication to satisfy The Corporation of the City of Belleville By-Law number 12524, The Planning Act, and the Parkland and Recreation Master Plan. This shall be free and unencumbered of contaminants and is developable for recreational facilities providing for the 599 residences and families in this area.

Please refer to the revised draft plan of subdivision, Block J will serve as the parkland dedication for the proposed development. The location of the proposed parkland dedication has already been reviewed and approved by the City.

28. The city shall require that storm/sanitary sewers, and water be installed to the parkland for future connection for the facilities.

Noted, please refer to the revised Functional Servicing Report.

29. Trails that are within a roadway are considered part of the road allowance as defined by the Ministry of Transportation Minimum Maintenance Standards apply, these shall not be included in the parkland dedication equation.

Noted.

30. Trails that extend the existing Recreational Trail and are not part of the Road Allowance may be considered in the parkland dedication equation.

Noted, Block J includes an extension of the multi-use path to the west of the subject lands and will connect with the path proposed along Street A.

31. Trails on open spaces and wetlands are not to be accounted for as parkland dedication as the city will not accept them.

Noted. No trails are proposed within the environmental protection lands.

32. A formal legal process will be required, should the development seek to use the recreational trail as a secondary emergency access to the development.

Noted. Please refer to the revised site plan and civil drawings as the trail is no longer required for a secondary emergency access.

Quinte Conservation

33. Provided that the E Zone is maintained on wetlands and those lands falling below the 76.05 metre (CGVD28) flood plain elevation (with exception of the large inland pond), and within the Environmental Protection (EP) Zone within the drafted consolidated Zoning By-law proposed, staff support the proposed zoning amendment.

Noted. The Environmental Protection (EP) Zone is still proposed to be maintained.

34. The site is located adjacent to the Bay of Quinte. Therefore, quantity control of stormwater is not required for this proposal. Staff will review for safe conveyance and control of erosion. Quality control of stormwater is required.

Noted.

35. Overland conveyances and grading should be reviewed in future submissions.

Noted.

36. The subject property is not located within the Intake Protection Zone of Belleville's drinking water system. Staff have no concerns related to this aspect of the proposal.

Noted.

37. A permit from this office is required for development within 15 meters of the flood hazard, 15 meters of the erosion hazard or 120 m of wetland boundary whichever is greater.

Noted. We anticipate this permit will be applied for to satisfy a draft plan condition.

38. However, in 2022 an updated floodplain (76.05 CGVD28) was approved by this office. This information has been provided to the owners, the City and their consultants over the past 2 years. The updated floodplain must be depicted on all drawings. Further, a 6 m setback from the floodplain must be included. The updated floodplain plus the 6 m setback on areas east of the central pond should define the limit of the proposed EP Zone on the eastern half of the property. The wetland boundary plus a 15 m setback will define the EP zone on the west half of the property.

Please refer to the resubmission package as all drawings/plans have been updated to reflect the 2022 updated floodplain mapping.

Building Department

39. A Record of Site Condition would be required to do any residential construction on these former Industrial lands. All other “applicable law” related to the Ontario Building Code would need to meet prior to issuing any Building permits.

Noted. A Record of Site Condition is underway on the subject lands and will be completed in compliance with all applicable laws and regulations.

MTO

40. outside of permit control area, no further comments

Acknowledged.

Hydro One

41. Hydro One does not have any plant in the areas identified.

Noted.

Bell Canada

42. The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further agrees and acknowledges to convey such easements at no cost to Bell Canada.

Noted.

43. The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost.

Noted.

44. Upon receipt of this comment letter, the Owner is to provide Bell Canada with servicing plans/CUP at their earliest convenience to planninganddevelopment@bell.ca to confirm the

provision of communication/telecommunication infrastructure needed to service the development.

Noted.

45. It shall be noted that it is the responsibility of the Owner to provide entrance/service duct(s) from Bell Canada's existing network infrastructure to service this development. In the event that no such network infrastructure exists, in accordance with the Bell Canada Act, the Owner may be required to pay for the extension of such network infrastructure. If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.

Noted.

Engineering

Transportation Impact Study

46. Section 2.2: Please group blocks by phase and mark phases on Figure 2.

Please refer to the updated Traffic Impact Study as Section 2.2 and Figure 2 have been updated to group by blocks.

47. Section 3.3: Our transit routes have recently changed. Route and stop descriptions are no longer accurate and will need to be updated.

Please refer to the updated Traffic Impact Study as Section 3,3 has been updated to reflect the latest transit information.

48. Section 5.2: Table 3 references incorrect street/ direction references compared to Figures 12-14 that follow. Please revise.

Please refer to the updated Traffic Impact Study as Table 3 has been updated to reflect the correct street names.

49. Section 7.1: Table 4 and all commentary after: Please sub-divide this section into time-horizon headings and group the modelling scenarios and commentary together. This will make it easier to cross-reference the commentary with the appropriate tables, and also to show when exactly the signal recommendation comes into play. Please also identify whether the analysis is a signalized or unsignalized analysis for all scenarios, and what Phases are being modelled.

2025 Horizon (Phase #'s)

Table x: Capacity Analysis of Haig/ Dundas, 2025

Future Background 2025 - Unsignalized: AM, PM LOS and 95% Results...

Future Total 2025 - Unsignalized: AM, PM LOS and 95% Results...

Refer to original comment sheet for formatting.

With the addition of corridor growth under the 2025 future background condition, the intersection continues to operate at a satisfactory level with the southbound left-turn movement continuing to report the greatest delay with a 24 second delay during the a.m. peak hour and 39 second delay during the p.m. peak hour.

With the addition of site generated traffic and the site access as the southern leg of the intersection under the 2025 future total condition, the greatest delay continues to be reported in the southbound left-turn movement with a 31 and 57 second delay during the a.m. and p.m. peak hour, respectively.

Please refer to the updated Traffic Impact Study as Section 7.1 of the report has been revised to provide further breakdown as requested.

50. Section 7.1 Queuing commentary is only provided on for the tracks in the Dundas-direction, and not for Haig. Please ensure that queuing comments are clearly stated for Haig as well. For example: unsignalized queuing for Future Total 2023 SBL is 40m will conflict with the rail line.

Please refer to the updated Traffic Impact Study as the text has been revised to include some discussion on the southbound queuing on Haig. When signalized, queuing will be mitigated through the installation of a third signal head north of the rail line which will stop traffic before the rail line when the light is red.

51. Section 3.1 and 7.1: Please comment on whether the new signals will need to be synchronized with the rail crossing (ie. how far away are the Haig tracks and does this trigger synchronization?) Please provide justification why or why not throughout where relevant.

Synchronization will not be required, but a third signal head should be installed north of the track that displays the same signal as at the intersection. Southbound vehicles approaching the red light will be forced to stop before the rail to minimize the number of vehicles that can accumulate between the tracks and Dundas Street.

52. Section 8: "It is recommended that the City monitor the operation of the intersection and implement traffic signals once the delays and queuing along Haig Road/ the site necessitate the change in traffic control". This conflicts with the line just previous to this section: "It is recommended that the intersection be signalized after Phase 1 of construction to provide the necessary capacity for turning movements onto Dundas Street from the subject site." What is the recommendation? Section 5.1 suggests that Phase 1 assumed build-out is 2025 which is only next year.

Please refer to the updated Traffic Impact Study as the text has been modified to clarify the recommendation.

53. Section 9: New zoning is in place. No need for 10245 references.

This application was submitted prior to the new zoning by-law coming into full force and affect. In light of the Clergy Principal, the application is considered under the previous by-law.

54. Signal timing will need to be submitted for review and approval as a draft condition.

Noted.

55. The former driveway entrance is existing, however are sightlines and approach grade acceptable for a municipal intersection? Will an unsignalized intersection be safe until signals are installed?

The proposed access is new and located slightly offset from the existing gravel driveway so that it aligns with Haig Road. The intersection will be designed appropriately as per municipal standards to ensure grade, lane alignment and intersection angle meet standards. Dundas

Street is fairly flat in this location and sightlines are not an issue for an unsignalized intersection which is consistent with all other driveways and public road intersections along Dundas Street.

Functional Servicing Report

56. The pumping station shall remain privately owned. What options are available so that the City does not have to assume a new pumping station? Option for condo-ownership? Condo area will be within SPS catchment.

As stated in the FSR, a Low Pressure Sewer System is an option the City could consider as part of the development approvals required per the Subdivision Agreement. The preferred is still a municipally owned and maintained Sewage Lift Station and Standby Generator that would be constructed as part of the servicing by the developer.

57. What phase/ time horizon will the lift station be required? Coordinate with TIS/ other reports.
Please refer to the revised Functional Servicing Report.

58. No comment on downstream capacity. Keegan Parkway Trunk Sewer has 600mm (min slope section 0.11%) and 900mm (min slope section 0.10%) to the plant. Please express flows from site as a percentage of the downstream pipe capacity for both low-slope pipe sections.

Please refer to the Sanitary Sewer Design Sheets in the revised Functional Servicing Report.

59. Sanitary sheet shows some of the new pipes are over capacity. Please revise.
Please refer to the updated design sheets.

60. Please add a design-flow-over-capacity flow percentage column to the sanitary sheets. Peak design flows are greater than pipe capacities for some lines in the table.
Please refer to the updated design sheets.

61. Water 3.2.2: Please provide a figure showing: the Hydrants identified in Table 1 and critical building locations based on RFF and whether they meet the proposed available hydrant flows.
Hydrant numbers are identified in the Watermain Distribution Drawing in the Functional Design Report.

62. Water 3.2.1: What are the water pressures like by hydrant testing at Haig and Dundas? Please provide comment on the pressure available with respect to building heights (see hydrant tests).
The hydrant on the Dundas Street East and the one on Haig Road are connected to the same watermain and the flow to either of the hydrants would be along both watermains on Dundas Street East and Haig Road being part of the overall watermain network. Therefore, the hydrants flow at either of the hydrants would be similar.

63. Storm 3.3.1: OGS units are not effective at achieving the 80% TSS removal. Please revise stormwater quality plan to ensure that the minimum 80% TSS removal can be achieved.
Please refer to the revised Functional Servicing Report, as alternative stormwater management quality treatment has been proposed with MOEC now limiting TSS Removal for OGS units.

64. Road 3.6.2: "It is proposed to provide a divided 5-lane entrance, 2 inbound and 3 outbound, for turning lane movements." Please ensure that this configuration aligns with TIS and their modelling. Drawings at the end of FSR do not show a five-lane entrance.

Please refer to the revised Functional Servicing Report, which aligns with the TIS utilizing the divided four lanes.

65. "The divided lane will also provide a second emergency access." What if the intersection or Road "A" south of the intersection is closed for any reason? Will residents be able to leave the site on their own accord in the event of an emergency? What is their alternate route?

An alternate Emergency Access Road is proposed through the proposed development to the east (Osprey Shores East Subdivision) which should be reviewed and developed in conjunction with this project.

66. How does the rail line affect emergency response times (or the ability for a response to occur)? Can police, fire, and ambulance services all access the site with at least two options?

An emergency vehicle will be able to access the development from the east, along Dundas Street East via Elmwood Drive of both rail crossings at Dundas Street East or Haig Road are blocked.

67. "There will be a conflict with traffic movement between the proposed intersection and the existing driveway to the immediate east. This driveway should be able to be relocated further easterly." Are the neighbours agreeable to this? Please coordinate with TIS.

The property's ownership is in discussion with the neighbours on relocating the adjacent driveway. A reference plan is also being drafted separately in regard to the triangular piece shown on the civil plans in red that is required and will become part of the City's public right-of-way

68. "There is a multi-purpose trail to the west of the property that could also be considered for a secondary emergency access road with the closest connecting street being Herchimer Avenue. This connection may be a benefit to the City as it would be the only access to the lands south of the CP Rail from Herchimer Avenue to South Front Street without a railway crossing."
 - All of Herchimer Avenue to South Front Street is south of the railway crossing. How long are the trains and how many grade-crossings could be blocked for trains at one time?
 - Please be clear whether this is an emergency vehicle access or not. CZA Site Plan shows a 6m emergency/ multi-use trail. Where does this go? Is there 6m available to the east?

The secondary Emergency Access is being addressed through the development proposed to the east (Osprey Shores East Subdivision) and is discussed in the Functional Servicing Report.

69. Drawings: "Relocate existing driveway to Dundas Street." Has this been confirmed by TIS to be a safe location for a driveway with new signals? Have the neighbours agreed to this?

See response above under no. 67.

70. Appendices are good, but please add annotated screen captures to the relevant sections of the report where they would help understanding without needing to flip. For example, the sanitary catchments that need a pumping station; hydrants; emergency access.

Please refer to the Functional Servicing Report.

71. Block G has two sanitary connections. If one property (condo), please provide for only one connection.

This will be addressed as part of the engineering drawing approval at the subdivision agreement stage.

Noise and Vibration Study

72. No comments at this time. Further comment from consultants will be needed as detailed architectural drawings are available (will be a draft condition).

Noted.

Environmental Impact Study

73. EIS does not have any comment or recommendations on lighting. Please provide comment and any mitigation recommendations for wildlife.

- Ensure all site lighting is directed away from environmentally sensitive areas and into developable area only?

- Requirement for appropriate Backlight-Uplight-Glare (BUG) ratings? Lighting analysis needed?

- If no lighting recommendations, please provide justification why mitigation is not needed.

Site lighting will be determined through future detailed design.

74. EIS does not comment on bird-safe-glass recommendations for any buildings? Should this be a recommendation for wildlife protection for any buildings? Please provide justification/comment why or why not.

The City of Belleville does not have any policies or regulations relating to bird-safe glass.

75. EIS comments on stormwater OGS approach (as indicated in FSR), however OGS units will not be able to achieve the required 80% TSS removal. Please coordinate new stormwater approach with FSR.

Please refer to the revised Functional Servicing Report.

76. Small lift station rated capacity is different than as specified in FSR. Please coordinate with FSR.

Please refer to the revised Functional Servicing Report.

ESA

77. Phase 2 ESA identified areas of concern. Please provide subsequent letter speaking to Brownfield remediation plan, as was offered during PAC meeting on April 2. As part of this letter, please include an update on the Record of Site Condition process, and what expected remediation and/or risk management measures are anticipated at this time. The City needs to fully understand any/all implications of potentially taking ownership of internal property which may remain impacted by soil and groundwater. Are there any other records or documentation involving MECP that can be shared with the City at this time?

Please refer to the response letter provided by BluMetric.

78. Phase 1 ESA suggested westerly portion and not entire portion. Please provide clarity from BluMetric limits of Phase 1 and 2 ESAs, as was offered during PAC meeting on April 2.

Please refer to the response letter provided by BluMetric.

Other Comments

79. All reports and drawings need to reference the most recent floodplain mapping from QCA, and not the 2012 mapping that was used.

Noted, the resubmission reflects the latest floodplain mapping.

80. Please clarify on drawings/ reports that the current owner will remain ownership of environmentally protected lands.

This is an ongoing discussion with the property's ownership.

81. Please provide updated stormwater management plan, as was offered during PAC meeting on April 2. Coordinate with FSR.

Please refer to the revised Stormwater Management Plan and revised Functional Servicing Report.

82. Please clarify Environmental Control Zone on Site Plan and coordinate throughout all documents as necessary.

Noted.

83. As well, clearly articulate the difference between all of the buffers that are shown on site plan and drawings, and their significance. Why do OS lands follow the "Variable" buffer?

Noted.

84. Comment sent separately via email on June 14: Please provide a brief synopsis of what the remediation plan will look like for the site?

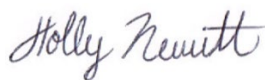
In order to proceed with the proposed residential development a Record of Site Condition (RSC) is required. In order to obtain the RSC, BluMetric has recommended that a Risk Assessment (RA) be completed and through this process any risk management measures (RMMs) or remedial actions will be identified. See accompanying letter from BluMetric in this regard.

We trust that this addresses all outstanding comments and the development can move forward to a supportive recommendation. Please feel free to contact the undersigned with any additional comments or questions at 613.542.5454.

Respectfully submitted,



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