

May 13, 2025 – 7504 McLeans Road

	Drawing/Document	Comment
CONVERSATION AUTHORITY – Grand River Conservation	1. “Site Alteration Permit - Schedule and Timing,” letter dated April 1, 2025, prepared by A&A Environmental Consultants.	See Attached.
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.	2. “Site Alteration Permit – Owner and Qualified Person Declaration,” letter dated April 1, 2025, prepared by A&A Environmental Consultants.	See Attached.
Grit Engineering Inc.		See Attached.
Ecologist - Dougan Ecology Christina Olar		See Attached.
Township of Puslinch – Andrew Hartholt, Chief Building Official	3. “Haul Route Acknowledgement for 7504 McLean Rd (Roll # 301000006100070000),” dated April 2, 2025, issued by The Township of Puslinch.	The final grading/control plan will need to match the approved site plan (which is currently in the application stage of site plan control)
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities	4. “Due Diligence Risk Assessment Report,” dated March 31, 2025, prepared by HS Group.	Public works has no concerns or comments at this time.
	5. “Scoped Environmental Impact Study, 7504 McLean Road East, Puslinch,” dated January 2025, prepared by Natural Resource Solutions Inc.	
	6. “Site Plan – Option 2, Transportation Depot, 7504 McLean Road, Puslinch, ON,” dated December 9, 2024.	
	7. “Site Alteration Permit Owner Authorization,” dated March 18, 2025, signed by Ranbir Singh Bhatti.	



May 13, 2025 – 7504 McLeans Road

	<p>8. "Transportation Depot, 7504 McLean Rd., Landscape Architecture," drawings dated January 27, 2025, prepared by MHBC.</p> <p>9. "Current Conditions Plan, 7504 McLean Road," dated January 22, 2025, prepared by MTE Engineers, Scientists, Surveyors.</p> <p>10. "Site Servicing Plan, 7504 McLean Road," dated January 22, 2025, prepared by MTE Engineers, Scientists, Surveyors.</p> <p>11. "Notes and Details Plan, 7504 McLean Road," dated January 22, 2025, prepared by MTE Engineers, Scientists, Surveyors.</p> <p>12. "Soil Identification & Characterization Report, 7504 McLean Road, Puslinch, Ontario," dated March 6, 2024, prepared by A&A Environmental Consultants.</p> <p>13. "Major Site Alteration Permit Requirement Checklist and Process", undated, issued by The Township of Puslinch.</p>	
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Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

May 5, 2025
via email
GRCA File: Site Alteration Permit- 7504 McLean Road E

Lynne Banks, Associate Planner, FONTENN
Township of Puslinch
7404 County Road 34
Puslinch, Ontario, N0B 2J0

Dear Lynne Banks,

Re: Site Alteration Permit Application
7504 McLean Road E, Puslinch
Gagandeep Dhinsa

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted Site Alteration Permit Application to develop the property with a warehouse and transportation terminal.

Recommendation

Prior to recommending approval, the GRCA requests that the floodplain be surveyed and the site plan and engineering drawings be updated with the delineated and confirm that the development activity is appropriately setback from the floodplain. Please see our detailed comments below.

Documents Reviewed by Staff

Staff have reviewed the following documents submitted with this application:

- Site Plan, prepared by Kalp Architect Inc., issued January 20, 2025;

GRCA Comments

GRCA staff have reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the *Planning Act* as per our CA Board approved policies.

Information available at our office indicates that a portion of the property contains floodplain and its associated regulated allowance. Due to the presence of these features, a portion of the property is regulated by the GRCA under Ontario Regulation 41/24 – Prohibited Activities, Exemptions and Permits Regulation. Any future development or other site alteration within the regulated area will require prior written approval from GRCA in the form of a permit pursuant to Ontario Regulation 41/24. A copy of GRCA's resource mapping is attached to this letter.

The Regulatory flood elevation (RFE) at this property is 322.3 m (CGVD28). Based on our review of the survey, the floodplain appears to extend onto the property in several locations. We request that, prior to approval of the site alteration permit, that the floodplain and the GRCA regulated area (which extends 15 metres from the floodplain) be delineated on the site plan and engineering plans, to confirm that the proposed development activity is appropriately setback from the floodplain. Based on the location of the floodplain, additional elevations (existing and proposed) may be required on the grading plan.

As the applicant has previously been invoiced in the amount of \$465 for the GRCA's review of site plan application D11-HBC, a fee for our review of this site alteration permit application will not be required.

Should you have any questions, please contact Ismet Esgin Zorlu (Resource Planner) at 519-621-2761 extension 2231 or iezorlu@grandriver.ca

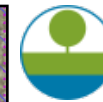
Sincerely,



Chris Foster-Perreault
Supervisor of Planning and Regulations
Grand River Conservation Authority

Enclosed: GRCA Mapping

Copy: Gagandeep Dhinsa, owner – (via email)



Grand River Conservation Authority

Date: Apr 22, 2025
Author: Ismet Esgin Zorlu

7504 MCLEAN RD E

Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)
 - Engineered
 - Estimated
 - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
 - Steep
 - Oversteep
 - Toe
- Slope Valley (GRCA)
 - Steep
 - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)

Subject Property

Copyright Grand River Conservation Authority, 2025.

Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user. The source for each data layer is shown in parentheses in the map legend. See [Sources and Citations](#) for details.

Scale 1:2,718

NAD83 UTM zone 17 (EPSG:26917)



April 30, 2025

Trace File No. 900-00477-01

Olive Zhang
Municipal Building Official
Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Sent via Email: ozhang@puslinch.ca

Re: Review of Site Alteration Permit Application for 7504 McLean Road West, Township of Puslinch, Ontario

Dear Olive:

1. INTRODUCTION, PURPOSE, AND USE

As requested by the Corporation of the Township of Puslinch (the Township), Trace Associates Inc. (Trace), has reviewed the information and data provided to the Township in support of the Site Alteration Permit Application (the Application) for the property located at 7504 McLean Road West, Township of Puslinch, Ontario (subject property or site). Trace understands that subject property is owned by HBC Real Estate 1 Inc. (the Owner or Applicant).

The documents provided by the Township that were reviewed by Trace included:

1. "Site Alteration Permit - Schedule and Timing," letter dated April 1, 2025, prepared by A&A Environmental Consultants.
2. "Site Alteration Permit – Owner and Qualified Person Declaration," letter dated April 1, 2025, prepared by A&A Environmental Consultants.
3. "Haul Route Acknowledgement for 7504 McLean Rd (Roll # 2301000006100070000)," dated April 2, 2025, issued by The Township of Puslinch.
4. "Due Diligence Risk Assessment Report," dated March 31, 2025, prepared by HS Group.
5. "Scoped Environmental Impact Study, 7504 McLean Road East, Puslinch," dated January 2025, prepared by Natural Resource Solutions Inc.
6. "Site Plan – Option 2, Transportation Depot, 7504 McLean Road, Puslinch, ON," dated December 9, 2024.
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12. "Soil Identification & Characterization Report, 7504 McLean Road, Puslinch, Ontario," dated March 6, 2024, prepared by A&A Environmental Consultants.
13. "Major Site Alteration Permit Requirement Checklist and Process", undated, issued by The Township of Puslinch.



As instructed by the Township, the purpose of the review completed by Trace was to determine the following:

- Does the Application include all the required information and data listed in the By-law Number 2023-057 (Site Alteration By-law)?
- Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

This document was prepared under Trace's Professional Report Conditions, provided as Attachment A. The scope of this document is limited to the matters expressly covered. This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace Associates Inc. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

2. **BACKGROUND INFORMATION**

Based on the reviewed information and data provided in support of the Application, Trace understands that the subject site is a rectangular shaped lot, approximately 2,800 square metres (2.8 ha) in size, located in the northwest area of Puslinch, Ontario at 7504 McLean Road. The site, which is zoned for industrial use, is reportedly vacant and bound by vacant land to northeast and northwest and developed industrial properties to the southwest and southeast. Trace also understands that approximately 24,000 cubic metres of fill was imported to the subject property in the past without a permit. The source site(s) of the excess soil/fill already brought to the site have not been identified in the reviewed documents.

Based on the reviewed information, Trace understands the site location, site setting, and the land use on the subject site and the adjacent properties, are as follows:

- the subject property is located within the Mill Creek-Grand River watershed.
- the east portion of the subject property is located within the Natural Heritage System.
- the north portion of the site is located within 30 metres of Water Body.
- the groundwater in the Township of Puslinch is used as a source of potable water.
- the subject site and surrounding properties are used for industrial/commercial purposes.

The applicable standards for assessing the environmental conditions on the subject property are those published by the Ontario Ministry of the Environment, Conservation and Parks (MECP or the Ministry).¹ in the document titled "Rules for Soil Management and Excess Soil Quality Standards", dated February 2024 (Soil Rules) and "Soil, ground water and sediment standards for use under Part XV.1 of the Environmental Protection Act", dated April 15, 2011, as amended (Ministry Standards).

Based on the site location, site setting, and the land use on the subject site and the adjacent properties, described above, the following excess soil quality standards (ESQS) published in the Soil Rules are considered applicable to the subject property:

- **The east portion of the subject property is located within the Natural Heritage System:**

Table 1: Full Depth Background Site Condition Standards for residential/parkland/institutional/industrial/commercial/community (RPIICC) property Use.

¹ Previously known as the Ministry of the Environment (MOE), the Ministry of the Environment and Energy (MOEE), and the Ministry of the Environment and Climate Change (MOECC). Currently known as the Ministry of the Environment, Conservation and Parks (MECP).



- **The north portion of the site is located within 30 metres of Water Body:**

Table 8.1: Full Depth Excess Soil Quality Standards for Use within 30 metres of a Water Body in a Potable Ground Water Condition for industrial/commercial/community (ICC) property Use.

- **The reminder of the subject site:**

Table 2.1: Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition ESQS for ICC property Use.

- **Groundwater:**

The groundwater quality standards applicable to the subject site are those published in the Ministry Standards in Table 2: Full Depth Generic Site Condition Standards in a Potable Ground Water Condition.

Sub-surface investigations conducted on the subject property by A&A Environmental Consultants Inc. in 2024 and 2025 identified presence of electrical conductivity (EC), sodium adsorption ratio (SAR), zinc, lead, and petroleum hydrocarbons (PHC) fraction F4 in soil/fill, and cobalt and copper in groundwater at concentrations exceeding the above-referenced applicable ESQS and/or the Ministry Standards. According to A&A Environmental Consultants Inc. the imported fill was identified as the likely source of the exceedances noted in the on-site soil/fill and groundwater.

Given that the imported soil/fill and the onsite groundwater quality were determined to exceed the applicable ESQS and/or the Ministry Standards, and the high costs that would be involved in removing the previously imported fill from the subject property, it appears that the Owner decided to manage the impacted in fill in place using a risk assessment (RA)/risk management (RM) approach. Based on the results of a due diligence RA, which reportedly was conducted by HS Group in general accordance with Ontario Regulation (O. Reg.) 153/04, the subject property can be used for industrial/commercial purposes following implementation of the following engineered and administrative risk management measures (RMMs):

- Placement of a soft (granular material) cap, minimum 0.5 metres thick over the entire site.
- Prohibiting the use of the on-site groundwater for potable purposes.

3. TRACE'S REVIEW COMMENTS

3.1 Does the Application include all the required information and data listed in By-law Number 2023-057 (Site Alteration By-law)?

Based on Trace's review of the documents provided in support of the Application, there is one significant omission and some minor deficiencies, including missing, incomplete and/or contradicting information or data. The specific deficiencies are listed in the attached Schedule B Control Plans review checklist (provided as Attachment B). The significant omission is discussed below.

No Site-Specific ESQS

According to the Application, although the previously imported fill exceeds the applicable generic ESQS; this fill could be left in place if the engineered and administrative RMMs described in the due diligence RA are implemented. However, the Application does not provide any site-specific soil quality standards for the subject property. As stated in the Site Alteration By-law, the excess soil/fill brought to the site must meet either the applicable generic ESQS listed in the Soil Rules, or the site-specific standards derived using the Beneficial Reuse Assessment Tool (BRAT) or a RA completed following the requirements of O. Reg. 153/04, as amended.



3.2 Does the soil imported to the subject property meet the applicable soil use and/or property use quality standards?

The excess soil/fill previously brought to the site does not meet the applicable generic ESQS, and no site-specific standards derived using the BRAT or a RA completed following the requirements of O. Reg. 153/04, as amended, were developed.

4. CONCLUSIONS

Based on the review of the above-listed documents, Trace has concluded the following:

1. The Application does not include all the required information or data that is specified in Section 5.2 (b) of the Site Alteration By-law.
2. The quality of the imported granular material used or to be used in the site alteration works does not meet the applicable generic ESQS.
3. No site-specific soil quality standards have been derived.

5. RECOMMENDATIONS

Based on the review of the above-listed documents, Trace provides the following recommendations:

1. The findings of due diligence RA prepared for subject property should be used to derive the site-specific excess soil quality standards.

6. LIMITATIONS

The scope of this document is limited to the matters expressly covered. The Corporation of the Township of Puslinch and any other party using this document with the express written consent of the Corporation of the Township of Puslinch and Trace also acknowledge that the conclusions and recommendations set out in this document are based on information and data provided by others. The reviewed information and data were assumed to be accurate unless otherwise stated and were not independently verified by Trace. As such, Trace Associates Inc. cannot be held responsible for environmental conditions at the subject site that were not apparent from the reviewed information and data or due to errors and/or omissions in the information and data reviewed.

This document was prepared for the sole benefit of the Corporation of the Township of Puslinch and may not be relied upon by any other person or entity without the express written consent of the Corporation of the Township of Puslinch and Trace. Any use or reuse of this document (or the findings, conclusions, and/or recommendations represented herein) by parties other than those listed above is at the sole risk of those parties.

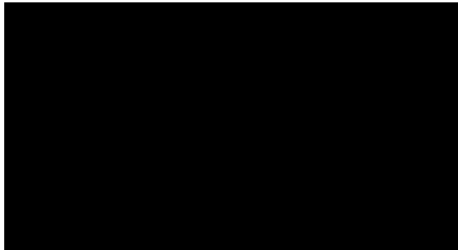


7. CLOSURE

We trust this information is sufficient for your use at this time. If you require additional information, please do not hesitate to contact the undersigned.

Yours very truly,

TRACE ASSOCIATES INC.



Thomas Kolodziej, B.A.Sc., P.Eng., QP_{ESA}
Senior Project Manager/Senior Technical Advisor

Attachment A Trace Associates Inc. Professional Report Conditions
Attachment B Schedule B Control Plans Review Checklist

DOCUMENT CONTROL

Revision	Description	Project Manager	File Location	Date Issued
0	Issued for client use	Thomas Kolodziej	K	April 30, 2025



ATTACHMENT A
TRACE ASSOCIATES INC. PROFESSIONAL REPORT CONDITIONS

1.0 USE OF REPORT

This report pertains to a specific site, development, organization, or business and a specific scope of work, all as specifically identified in the within report (the "Report") (such site, development, organization or business and scope of work is hereinafter referred to as the "Subject"). It is not applicable to any other Subject. An assessment or evaluation of a Subject other than the one specifically identified in the within Report would necessitate a supplementary evaluation.

This Report and the assessments, evaluations, and recommendations contained in it are intended for the sole use of Trace Associates Inc.'s (Trace's) client, as specifically identified in the Report (the "Client"). If this Report is being read by any other person (other than from a regulatory body or government agency), such person is hereby advised that Trace is not making any observations, evaluations, or recommendations for such person's benefit and such person is unable to rely on the contents of this Report. Any such person would use this Report at their own risk, and liability is expressly declined to any person other than the Client. Accordingly, no responsibility is accepted by Trace for any damages suffered by any reader of this Report other than the Client. Diligence by all readers is assumed. Any use of or reliance on the Report by any person other than the Client is at the sole risk of the user.

This Report is subject to copyright and may not be reproduced either wholly or in part without the prior, written permission of Trace. The Client agrees that it shall use the Report for its own internal purposes, and it shall not provide the Report to another party (other than a regulatory body or government agency). The report provided is suitable for use by the client for the intended purpose only after accounts are settled for the work conducted.

2.0 LIMITATION OF REPORT

This Report is based solely on the information and conditions that existed and were presented to Trace at the time of Trace's evaluation. The Client acknowledges conditions affecting the contents of this Report can vary with time and that the conclusions and recommendations set out in this Report are time sensitive.

The Client also acknowledges that the conclusions and recommendations set out in this Report are based on limited observations and upon circumstances, assumptions and information presented or made available to Trace by the Client and, where applicable testing on the Subject site. Further, the Client acknowledges that conditions may vary across a site and with time which, in turn, could affect the conclusions and recommendations made.

The Client acknowledges that Trace is neither qualified to, nor is it making, any recommendations with respect to the purchase, sale, investment or development of the site, the decisions on which are the sole responsibility of the Client.

3.0 INFORMATION PROVIDED TO TRACE BY OTHERS

During the performance of the work and the preparation of this Report, Trace may have relied on information provided by persons (third parties) other than the Client if instructed to do so by the Client. Trace did not verify this information and accepts no responsibility for the accuracy or the reliability of such information and disclaims all liability with respect thereto.



4.0 LIMITATION OF LIABILITY

In consideration of Trace providing the services requested by the Client to complete the Report, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged by the Client, the Client agrees that Trace's liability shall be limited as follows:

1. With respect to any claims brought against Trace by the Client for damages of any kind whatsoever, including without limitation, incidental, consequential, exemplary, or punitive damages, for any reason whatsoever arising out of the observations, conclusions, or recommendations contained in the Report, the amount of such claim and the extent of Trace's liability shall be limited to the amount of fees paid by the Client to Trace under this Agreement.
2. With respect to claims brought by any third parties arising out of the contents of this Report, the Client agrees to indemnify, defend, and hold harmless Trace from and against any and all claim or claims, action or actions, demands, damages, penalties, fines, losses, costs, and expenses of every nature and kind whatsoever, including solicitor-client costs, arising or alleged to arise either in whole or part out of services provided by Trace or the Report completed by Trace.

5.0 DISCLOSURE OF INFORMATION BY CLIENT

The Client acknowledges that in conducting the scope of work (the "Scope") and preparing the Report, Trace has relied on information provided by the Client. Trace, in conducting the Scope and preparing the Report, has assumed the accuracy, and has not attempted to verify the completeness of all such information. The Client acknowledges that Trace cannot be held liable for any damages to the Client resulting from any inaccuracies or incompleteness in the information provided by the Client to Trace.

6.0 STANDARD OF CARE

Services performed by Trace for this Report have been conducted in a manner consistent with the level of skill ordinarily exercised by members of the professional associations of which Trace's employees who worked on this Scope and this Report are members. Professional judgment has been applied in developing the conclusions and/or recommendations provided in this Report (or under separate cover). No further warranty or guarantee, express or implied, is made concerning the test results, comments, recommendations, or any other portion of this Report.

7.0 NOTIFICATION OF AUTHORITIES

The Client acknowledges that in certain instances, the discovery of hazardous substances or conditions and materials may require that regulatory agencies and other persons be informed. The Client acknowledges and agrees that the notification of such bodies or persons remains wholly the responsibility of the Client; however, agrees that notification to such bodies or persons, as required, may be done by Trace in Trace's reasonably exercised discretion.

8.0 OWNERSHIP OF INSTRUMENTS OF SERVICE

The Client acknowledges that all reports, plans, and data generated by Trace during the performance of the work and preparation of the Report and other documents prepared by Trace in the course of performing the scope are considered its professional work product and shall remain the copyright property of Trace. Any patents, methods, ideas, concepts, know-how, copyrights, trademarks, trade secrets, or other intellectual property rights developed by Trace prior to, during, and in the course of performing the Services



("IP") will be the exclusive property of Trace. The only exception to this is where Trace has prepared an Emergency Response Plan and associated training materials for a Client; in these cases, the Client owns these documents and is solely responsible for their implementation in an emergency.

9.0 ALTERNATE REPORT FORMAT

Where Trace submits both electronic file and hard copy versions of the Report, drawings, and other documents and deliverables (collectively termed "Trace's instruments of professional service"), the Client agrees that only the signed and stamped versions shall be considered final and legally binding. Trace shall keep the original electronic documents for record and working purposes, and, in the event of a dispute or discrepancies, Trace's electronic copy shall govern.

The Client agrees that both electronic file and hard copy versions of Trace's instruments of professional service shall not, under any circumstances, no matter who owns or uses them, be altered by any party, except Trace. The Client warrants that Trace's instruments of professional service will be used only and exactly as submitted by Trace and for the purpose for which such instruments of professional service were intended.

The Client recognizes and agrees that electronic files submitted by Trace have been prepared and submitted using specific software and hardware systems. Trace makes no representation about the compatibility of these files with the Client's current or future software and hardware systems.

10.0 RECORDS RETENTION

Trace will, at its own cost and effort, retain project related Client data, including billing records, project files, documents, and final reports, for 12 years from the date of written authorization to proceed with the Scope. After 12 years, all data and information will be destroyed without notice to the Client. The Client may request in writing, within the 12-year period, copies of such information, and Trace will provide the information to the Client at the Client's cost.

11.0 GOVERNING LAW

The validity, construction, and performance of these General Conditions, which the Client shall be deemed to have accepted upon its acceptance of this Report, shall be governed by the laws in effect in the Province where the Subject site is located.



ATTACHMENT B
CONTROL PLANS REVIEW CHECKLIST

BY-LAW NUMBER 2023-057 – SCHEDULE B

SCHEDULE “B” CONTROL PLANS

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 30, 2025		
SITE ADDRESS:	7504 McLean Road West, Township of Puslinch, Ontario		
Item	Included	Not included	Comments
1. A control plan(s) required to be submitted as part of any Application for a Permit pursuant to this By-law shall include, among other things, the following:			
a. a key map showing the location of the Site;	✓	<input type="checkbox"/>	
b. the Global Positioning System (GPS) coordinates of the centroid of the Site in terms of easting and northing;	✓	<input type="checkbox"/>	
c. the Site boundaries and number of hectares of the Site;	✓	<input type="checkbox"/>	
d. the use of the Site and the location and use of the buildings and other structures adjacent to the Site;	✓	<input type="checkbox"/>	
e. the location, dimensions and use of existing and proposed buildings and other structures existing or proposed to be erected on the Site;	✓	<input type="checkbox"/>	
f. the location of lakes, streams, wetlands, channels, ditches, other watercourses, and other bodies of water on the Site and within thirty (30) metres beyond the Site boundary;	✓	<input type="checkbox"/>	
g. the location of the predominant Soil types;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
h. the location size, species, and condition of all Trees as defined in this By-law, including their dripline, and the composite dripline of all other Vegetation;	✓	<input type="checkbox"/>	N/A (no trees on the subject property)
i. the location of driveways on the lands and all easements and rights-of-way over, under, across or through the Site;	✓	<input type="checkbox"/>	
j. the location and dimensions of any existing and proposed stormwater Drainage systems and natural Drainage patterns on the Site and within thirty (30) metres of the Site boundaries;	✓	<input type="checkbox"/>	
k. the location and dimensions of utilities, structures, roads, rights-of-way, easements, highways, and paving;	✓	<input type="checkbox"/>	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 30, 2025		
SITE ADDRESS:	7504 McLean Road West, Township of Puslinch, Ontario		
Item	Included	Not included	Comments
l. the existing Site topography at a contour interval not to exceed 0.5 metres and to extend a minimum of thirty (30) metres beyond the Site boundaries;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
m. the Proposed Grade(s) and Drainage system(s) to be used upon completion of the work, which is the subject of the Permit;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
n. the location and dimensions of all proposed work which is the subject of the Application for a Permit;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
o. the location and dimensions of all proposed temporary Topsoil or Fill stockpiles;	<input type="checkbox"/>	<input type="checkbox"/>	NA – imported fill has been graded
p. the location, dimensions, design details and specifications of all work which is the subject of the Application, including all Site Erosion and Dust Control measures or Retaining Walls necessary to meet the requirements of this By-law and the estimated cost of the same;	<input type="checkbox"/>	<input type="checkbox"/>	
q. a schedule of the anticipated starting and completion dates of all proposed work which is the subject of the Application for a Permit;	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The anticipated start and completion dates are not provided
r. a list of the type of equipment and machinery that will be used during the Site Alteration process, including the expected days and times of operation in accordance with this By- law;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A list of the types of equipment and machinery that will be used during the Site Alteration process is not provided
s. provisions for the maintenance of construction Site Erosion and Dust Control measures during construction and after, as required;	<input type="checkbox"/>	<input type="checkbox"/>	
t. typical notes on the final rehabilitation plan to indicate the final ground cover materials, type and size of Vegetation to be planted, depth of Topsoil, Tree removals or Tree protection measures;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 30, 2025		
SITE ADDRESS:	7504 McLean Road West, Township of Puslinch, Ontario		
Item	Included	Not included	Comments
u. proposed Site access location(s) and haul route(s) to and within the Site;	✓	<input type="checkbox"/>	
v. a description of the quality and source of the proposed Fill with confirmation that the Fill meets the applicable Excess Soil Quality Standards (ESQS) for the Site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The source(s) of excess soil/fill already brought to the site are not identified. The fill brought to the site does not meet the applicable generic ESQS and no site-specific standards were developed.
i. if Site-specific standards for Soil quality acceptance have been developed using the MECP's Excess Soil Beneficial Reuse Assessment Tool (BRAT), a copy of the BRAT model input and output and a signed statement by the Qualified Person preparing the BRAT model;	<input type="checkbox"/>	<input type="checkbox"/>	NA
ii. If Site-specific standards for Soil quality acceptance have been developed using a risk assessment (RA) pursuant to the requirements in the Rules for Soil Management and Excess Soil Quality Standards, a copy of the risk assessment and a signed statement by the Qualified Person who prepared the risk assessment model must be submitted;	✓	<input checked="" type="checkbox"/>	A due diligence RA was prepared for the site; however, no site-specific standards were developed. A copy of the RA was provided.
w. a Sampling and Analysis Plan (SAP) for the source of the proposed Fill;	✓	<input type="checkbox"/>	
x. a Quality Assurance/Quality Control (QA/QC) Program;	✓	<input type="checkbox"/>	
y. the scale of drawings, either 1:500 or 1:1000;	✓	<input checked="" type="checkbox"/>	Drawings are at 1:300, 1:400, and 1:500 scale
z. operational procedures manual;	✓	<input type="checkbox"/>	
aa. for Site to receive greater than 10,000 m ³ , and where required by the provisions of Ontario Regulation 406/19, as amended, file a notice on the Excess Soil Registry operated by RPRA; and	<input type="checkbox"/>	<input type="checkbox"/>	NA - imported fill was placed on-site in the past, by others

BY-LAW NUMBER 2023-057 – SCHEDULE B

REVIEW CHECKLIST FOR CONTROL PLAN DATED:	April 30, 2025		
SITE ADDRESS:	7504 McLean Road West, Township of Puslinch, Ontario		
Item	Included	Not included	Comments
bb. all other information as deemed necessary or required by the Designated Official.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Where a permit from the County of Wellington or the Township is required to use any portion of the proposed haul route, the issuance of, and conformity with such permit(s) shall be deemed to be a condition of the issuance of the Permit under this By-law.	<input type="checkbox"/>	<input type="checkbox"/>	NA
3. It shall be the responsibility of the Owner to ensure that all Fill which is Placed or Dumped under this By-law shall conform with, and meet, the requirements of this By-law and all conditions of the Permit. At any time during the term of the Permit, an Inspector or the Designated Official may require evidence of such conformity, including, without limiting the generality of the foregoing, a requirement that the Permit Holder provide evidence to the satisfaction of the Designated Official that each Truckload complies with the requirements of this By-law.	<input type="checkbox"/>	<input type="checkbox"/>	NA
4. Every control plan accompanying an Application for a Permit under this By-law must be stamped by a Qualified Person approved by the Designated Official.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Notwithstanding any other provisions of this By-law, the Designated Official may waive the requirement for a Control Plan or any part thereof, after taking into consideration the proposed works and the anticipated impact on the Site and the surrounding environment.	<input type="checkbox"/>	<input type="checkbox"/>	NA

April 29, 2025

Olive Zhang
Building Services Technician
Township Of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J00

**Major Site Alteration Permit Application Review
7504 McLean Road West, Puslinch, ON N0B 2J0**

GRIT Engineering Inc. (GRIT) was retained by the Township of Puslinch Building Department to complete a technical review of the Major Site Alteration Permit Application for 7504 McLean Road West in Puslinch, Ontario. The practitioner of record is Adam Slawich of MTE Consultants inc. (aslawich@mte85.com). GRIT attempted via email to contact the practitioner on the application to inform them of a Technical Review on April 29, 2025, per Section 6.1.1 Technical Reviews of the Professional Engineers Reviewing Work Prepared by Another Professional Engineer Guideline (PEO, October 2011). It is understood a letter was submitted to the Township of Puslinch in support of a Site Alteration Permit Application at 7504 McLean Road West, Puslinch, Ontario. It is understood that this is an ongoing project, and GRIT has not been on site to date. GRIT's technical review is limited to civil engineering scope. It is understood Trace Associates is to provide excess soil and environmental engineering review concurrently.

GRIT has been provided with the following updated documents submitted for the application for our review:

- Municipal Development Standards (MDS), Township of Puslinch, dated September 2019.
- Township of Puslinch Comprehensive Zoning By-Law No. 023-18, dated May 2021.
- Township of Puslinch By-Law Number 2023-057
- Major Site Alteration Permit Requirement Checklist and Process.
- Site Alteration Permit Owner Authorization, dated 2025-03-18
- Haul Route Permit for 4670 Sideroad 10N, signed by Mike Fowler, dated 2025-04-02
- Report: HSP Group, Due Diligence Risk Assessment Report, 7504 McLean Road, Puslinch, dated March 31, 2025
- Letter: A&A Environmental Consultants Inc., Site Alteration Permit, Owner and Qualified Person Declaration, dated April 1, 2025
- Letter: A&A Environmental Consultants Inc., Letter: A&A Environmental Consultants Inc., Site Alteration Permit, Owner and Qualified Person Declaration, dated April 1, 2025
- Drawing: KALP ARCHITECT INC., Site Plan Option 2, Drawing No. SP-01 R2, dated 2024.02.22
- Drawing: MTE Consultants Inc., Project No. 55237-100, Current Conditions Plan, Drawing C1.1, dated May 14/24
- Drawings: MTE Consultants Inc., Project No. 55237-100, Site Grading, SWM And Sediment and Erosion Control Plan, Drawings C2.1, dated Oct. 11/24. Site Servicing Plan Drawing C2.2 dated Oct. 11/24. Notes 7 Details Plan C2.3 dated Oct. 11/24.
- Drawing: BSR&D Surveyors, Reference No. 18-14-810-02-A, dated September 9, 2020

- Drawing: MHBC, Landscape Plan and Details, Drawing Nos. LP01, LP02, LD01 & LD02, dated 2024-08-13
- Report: NRSI, Scoped Environmental Impact Study, Project No. 3370, dated January 2025.
- Report: A&A Environmental inc., Soil Identification & Characterization Report, 750 McLean Road, Report No. 8368, dated March 6, 2024

Review Comments – Civil

1. The following items should be addressed on the Control Plan as Per the Major Site Alteration Permit Checklist;
 - The use of the Site and the location and use of the buildings and other structures adjacent.
 - Regulatory limits, particularly GRCA that apply to the site as per NRSI mapping.
 - Locations of lakes, streams, wetlands, channels, ditches and other watercourses on the Site and within thirty (30) metres beyond the site boundary.
 - Location of Soil Types.
 - Location and dimensions of any utilities and easements.
 - Location and dimension of all proposed temporary Topsoil and fill Stockpiles.
2. The site has significant cut/fill and consideration to geotechnical investigation and reporting to support the operations should be given.
3. Confirm if there are any existing trees on the property to be protected as per NRSI Report.
4. Confirm whether there is a Stormwater Management (SWM) Report available to demonstrate quality and quantity control parameters as per the MDS were achieved. A SWM Report was not provided at this time.
5. There is no water service identified on the Site Servicing Plan. Confirm how service will enter the building from the well.
6. Confirm there is sufficient room for the retaining wall construction along the southwest side of the building.
7. NRSI report recommends lighting to be directed away from the wetland and consideration should be given to a photometric plan and/or additional details on how lighting proposed on KALP Plan will affect adjacent properties.
8. Recommended to verify cut/ fill volume from proposed grading plan and excess soil considerations.
9. Confirm if the wastewater flow will be above or below 10,000L/day.



133 REGENT STREET
STRATFORD, ON N5A 3W2
519.305.5727
gritengineering.ca

Kind regards,

GRIT Engineering Inc.

Montana Wilson, EMBA, M.Eng, P.Eng, PMP
Owner
montana@gritengineering.ca



3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

May 12, 2025

Township of Puslinch
7404 Wellington Rd. 34
Puslinch, Ontario
N0B 2J0
Attn. Olive Zhang, Municipal Building Official I

RE: Site Alteration Permit - P11/HBC -7504 Mclean Rd W - Ecology Comments

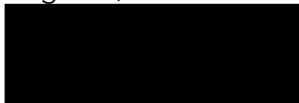
Dear Olive,

Thank you for the opportunity to review the Major Site Alteration Permit Application for 7504 Mclean Rd W. As part of this application, Dougan requests the following ecology documents for review:

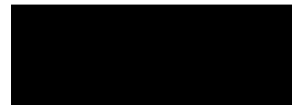
1. Revised EIS - as per the Technical Comments below
2. Revised Landscape Plan - as per the Technical Comments below
3. Tree Preservation Plan - has not yet been provided

Please do not hesitate to contact the undersigned with any questions on the above.

Regards,



Christina Olar, HBSc, Eco. Mgmt. Tech., ISA
Ecology Manager



Steven Hill, BEnvSc, MSc, PhD
Principal, Senior Ecologist



DETERMINATION OF COMPLETENESS

- Incomplete; see below.

ADDITIONAL REQUIREMENTS

- Revised EIS (see Technical Comments)
- Revised Landscape Plan (See Technical Comments)
- Tree Preservation Plan (not included in submission)

TECHNICAL COMMENTS

Environmental Impact Study (NRSI, January 2025) Comments

- **Section 5.3.4** states that the cultural meadow is not considered to be preferred habitat for butterflies due to its small size and poor quality. The Plant List contains Common Milkweed (*Asclepias syriaca*) which is the host plant for Monarch (Special Concern). It is recommended that enhancement seeding/ plantings include Common Milkweed to mitigate potential impacts to this species.
- **Section 6.0** notes that the subject property contains loose gravel/sand fill. This substrate, coupled with the proximity to wetland habitat and sun exposure should be considered suitable for turtle nesting in the absence of formal field studies. Possible SWH for turtle nesting should be considered. It is acknowledged that section 7.4.2 recommends sediment barrier fencing that will also function to prevent turtles and other wildlife from the work area during construction. The location of this fencing should be shown on a figure. The report should clarify that fencing should be in place prior to pre-grading. It is further recommended that a SAR (Species at Risk) encounter protocol be developed for on-site workers in the event that SAR are encountered within the work area.
- **Section 7.3.1** specifies that tree protective fencing and sediment barriers should be installed at the limit of development. Further, the report notes *"the development will require the removal of the cultural meadow vegetation and individual trees across the subject property. Hedgerow trees along the east and south boundaries of the subject property will be protected by avoiding and minimizing grading and asphalt within the dripline and providing a 1m buffer where possible."*
 - A Tree Preservation Plan should be prepared by a qualified Arborist, Landscape Architect or Tree Management Professional to identify the number of trees anticipated to be preserved, injured or removed, as well as the locations of Tree Protection Fencing and associated tree mitigation strategies. Tree Protection Fencing and sediment barriers should be



shown on all drawings and should be installed and inspected prior to pre-grading.

- **Section 7.4.1** - Please show the recommended Erosion & Sediment Control/Wildlife Exclusion Fencing on an EIS figure.
- **Section 7.6** - the proposed enhancements are supported. Please show the conceptual enhancement area(s) on a figure. It is also recommended to include a pollinator friendly seed mix (including *Asclepias syriaca* - Monarch host plant, which was documented in the Cultural Meadow proposed to be impacted).
- **Section 8.0** - a summary of enhancement recommendations should be included in addition to the mitigation measures.
- **Significant Wildlife Habitat Screening Table Appendix**
 - Woodland Area-Sensitive Bird Breeding Habitat: The Assessment Details note that there is no interior habitat within the subject property or subject area. Based on our review of aerial imagery and LIO mapping, the adjacent natural feature appears to be much larger than 30 ha of contiguous habitat, and certainly contains interior forest habitat measured at least 200m from the forest edge. Please revise.
- **Appendix IV Reptiles and Amphibians Species List**
 - Jefferson Salamander (Endangered) is included in the background species records summary table. Given that targeted surveys were not undertaken and suitable habitat presence within the adjacent lands, the EIS should include a discussion of how potential impacts to this species will be avoided and mitigated.
- **Map 2** displays a 10 m buffer from the feature boundary. Please revise to show the greater of either the PSW (30 m buffer) or woodland buffer (10 m). There appear to be some areas where the PSW is very close to the woodland edge, and therefore has not been afforded an adequate buffer. Further, **section 6.0** should include a brief rationale on the proposed buffer widths shown on Map 2 in the context of the ecological sensitivities present in the adjacent natural area.

Landscape Plan (MHBC, 2024) Comments

- **LP01/LP02** - There are a number of non-native / native cultivar species proposed. Given the proximity of the site to a high-quality natural area, it is recommended that the species list is revised to replace non-native/cultivars with suitable native species to maintain and enhance biodiversity. Suggestions for native replacement species are included in Table 1 below:



Table 1. Recommended native species alternatives for Landscape Plan.

Species Specified on LP01/LP02	Native/Non-Native (NN)/Cultivar	Recommended native species alternative(s)
White spruce	Native	n/a
Blue Colorado spruce	NN	White spruce (<i>Picea glauca</i>), eastern white cedar (<i>Thuja occidentalis</i>), balsam fir (<i>Abies balsamea</i>)
Armstrong red maple	Native-cultivar	Non-cultivar freeman maple (<i>Acer x Freemanii</i>), silver maple (<i>Acer saccharinum</i>), red maple (<i>Acer rubrum</i>)
Sugar maple	Native	
Autumn blaze (freeman) Maple	Native-cultivar	Non-cultivar freeman maple (<i>Acer x Freemanii</i>), silver maple (<i>Acer saccharinum</i>), red maple (<i>Acer rubrum</i>)
Paper birch	Native	
Upright European white birch	NN	Paper birch (<i>Betula papyrifera</i>)
Fastigate maidenhair tree (ginkgo)	NN	Trembling Aspen (<i>Populus tremuloides</i>), Honey Locust (<i>Gleditsia triacanthos</i>), Native serviceberry (<i>Amelanchier</i> ssp.), hackberry (<i>Celtis occidentalis</i>), white oak (<i>Quercus alba</i>), Kentucky coffee tree (<i>Gymnocladus dioica</i>), bur oak (<i>Quercus macrocarpa</i>), pin cherry (<i>Prunus pensylvanica</i>)
Columnar tulip poplar	Native-cultivar	Use non-cultivar tulip poplar (<i>Liriodendron tulipifera</i>)
Bloodgood London plane tree	NN	American Sycamore, American linden (<i>Tilia americana</i>), white oak (<i>Quercus alba</i>), bur oak (<i>Quercus macrocarpa</i>), pin cherry (<i>Prunus pensylvanica</i>), black walnut (<i>Juglans nigra</i>), red maple (<i>Acer rubrum</i>)
American linden	Native	n/a
Greenspire littleleaf linden	NN	hackberry (<i>Celtis occidentalis</i>), American linden (<i>Tilia americana</i>), (<i>Quercus alba</i>), bur oak (<i>Quercus macrocarpa</i>), pin cherry (<i>Prunus pensylvanica</i>), black walnut (<i>Juglans nigra</i>), red maple (<i>Acer rubrum</i>)



Species Specified on LP01/LP02	Native/Non-Native (NN)/Cultivar	Recommended native species alternative(s)
Pioneer elm	NN	American Elm 'Valley Forge' (<i>Ulmus americana</i> 'Valley Forge'), American linden (<i>Tilia americana</i>), (<i>Quercus alba</i>), bur oak (<i>Quercus macrocarpa</i>), pin cherry (<i>Prunus pensylvanica</i>), black walnut (<i>Juglans nigra</i>), red maple (<i>Acer rubrum</i>)
Dense Japanese yew	NN	Canada yew (<i>Taxus canadensis</i>), Winterberry (<i>Ilex verticillata</i>), Fragrant Sumac (<i>Rhus aromatica</i>), Wintergreen (<i>Gaultheria procumbens</i>), Common juniper (<i>Juniperus communis</i>), Buffaloberry (<i>Shepherdia canadensis</i>)
Karl foerester feather reed grass	NN	Big bluestem (<i>Andropogon gerardi</i>), sideoats grama (<i>Bouteloua curtipendula</i>), Canada wild rye (<i>Elymus canadensis</i>), switch grass (<i>Panicum virgatum</i>), little bluestem (<i>Schizachyrium scoparium</i>), Indiangrass (<i>Sorghastrum nutans</i>)
Bigroot geranium	NN	Canada Anemone (<i>Anemonastrum canadense</i>), Foamflower (<i>Tiarella cordifolia</i>), Virginia Waterleaf (<i>Hydrophyllum virginianum</i>), Wild geranium (<i>Geranium maculatum</i>)
Silver dragon lilyturf	NN	Plantainleaf Sedge (<i>Carex plantaginea</i>), Wood Fern (<i>Dryopteris marginalis</i>), Christmas Fern (<i>Polystichum acrostichoides</i>), Barren Strawberry (<i>Waldsteinia fragarioides</i>), Big bluestem (<i>Andropogon gerardi</i>), sideoats grama (<i>Bouteloua curtipendula</i>), Canada wild rye (<i>Elymus canadensis</i>), switch grass (<i>Panicum virgatum</i>), little bluestem (<i>Schizachyrium scoparium</i>), Indiangrass (<i>Sorghastrum nutans</i>)
Eastern redcedar	Native	n/a
white pine	Native	n/a
Eastern hemlock	Native	n/a
Silver maple	Native	n/a
Canadian serviceberry	Native	n/a
Tulip poplar	Native	n/a



Species Specified on LP01/LP02	Native/Non-Native (NN)/Cultivar	Recommended native species alternative(s)
Accolade TM elm	Non native	American Elm 'Valley Forge' (<i>Ulmus americana</i> 'Valley Forge'), American linden (<i>Tilia americana</i>), White oak (<i>Quercus alba</i>), bur oak (<i>Quercus macrocarpa</i>), pin cherry (<i>Prunus pensylvanica</i>), black walnut (<i>Juglans nigra</i>), red maple (<i>Acer rubrum</i>)
Gray dogwood	Native	n/a
Ninebark	Native	n/a
American elderberry	Native	n/a

