

September 29, 2025 – 7504 McLeans Road

	Drawing/Document	Comment
CONVERSATION AUTHORITY – Grand River Conservation	1. 8368 - Site Development Documents - September 2025 - Submission 2	See Attached.
Trace Associates Inc /XCG– Thomas Kolodziej, P. Eng.	2. 8368 - Site Alteration Permit - Schedule & Timing Letter	The updated documents submitted in support of the site alteration permit application address Trace's comments provided in the letter dated April 30, 2025. Trace has no additional comments.
Grit Engineering Inc.	3. 8368 - Major Site Alteration Permit Requirement Checklist, Control Plan, and Details - 7504 McLean Road, Puslinch, ON	
Ecologist - Dougan Ecology Christina Olar	4. 8368 - Soil Investigation & Characterization Report - 7504 McLean Road, Puslinch, ON	Requested documents have been provided. Comments have been prepared as part of the 2nd SPA submission (separate circulation).
Township of Puslinch – Andrew Hartholt, Chief Building Official	5. 7504 McLean Rd - Haul Route Permit FINAL	No comments.
Township of Puslinch – Mike Fowler, Director of Public Works, Parks and Facilities	6. 8368 - Site Alteration Permit - Owner QP Declaration 7. DDRA- 7504 McLean - Report - FINAL - revised	Public works has no concerns or comments at this time.



September 25, 2025
via email
GRCA File: Site Alteration Permit- 7504 McLean Road E

Olive Zhang
Township of Puslinch
7404 County Road 34
Puslinch, Ontario, N0B 2J0

Dear Olive Zhang,

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 of the site alteration application, the GRCA requires clarification about the extent of the floodplain delineated on the property. Please see our detailed comments below.

Documents Reviewed by Staff

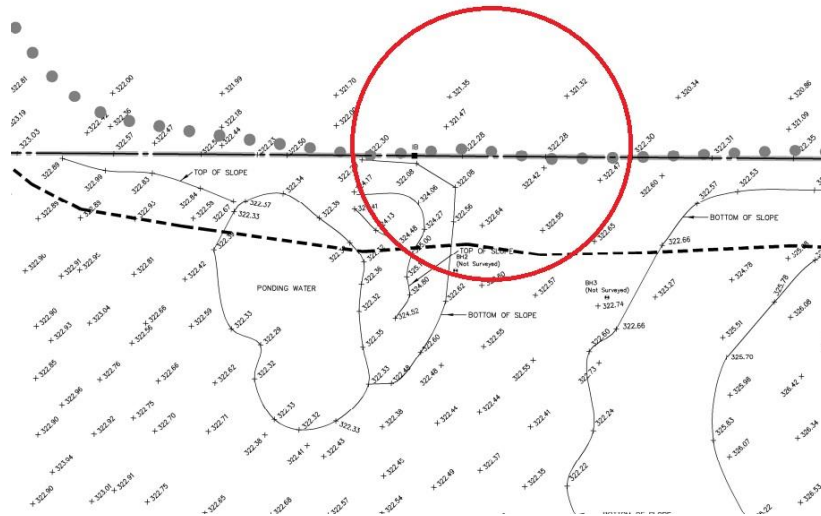
Staff have reviewed the following documents submitted with this application:

- Site Development Plan, prepared by MTE Engineers, Scientist, Surveyors, revised September 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.

The Regulatory flood elevation (RFE) at this property is 322.3 m (CGVD28). We understand that that the floodplain and the GRCA regulated area are added on the site plan. However, based on our review of the survey, the floodplain still appears to extend onto the property in several locations. Some elevations along the west boundary of the property (e.g., 322.08 m) are below the regulatory floodplain line. Therefore, it is unclear whether the floodplain elevation has been accurately delineated on-site, and whether the proposed development activity is appropriately setback from the floodplain.

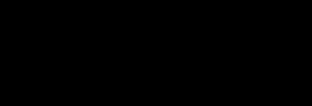


Drawing C1.1: Original Conditions Plan

Please provide clarification regarding the extent of the floodplain in the area shown above. Based on the current delineation, additional survey points may be required and should be shown on the plans. Please kindly review and revise as necessary.

Should you have any questions, please contact me at 519-621-2761 extension 2231 or iezorlu@grandriver.ca

Sincerely,



Ismet Esgin Zorlu
Resource Planner
Grand River Conservation Authority

Copy: Gagandeep Dhinsa, owner – (via email)



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

September 25, 2025

Township of Puslinch
7404 Wellington Rd. 34
Puslinch, Ontario
N0B 2J0
Attn. Monika Farncombe

RE: 7504 McLean Rd. E. - 2nd Submission Ecology Comments

Dear Monika,

Dougan Ecology has completed a review of the 2nd submission Site Plan Application documents for 7504 McLean Rd E, including:

1. Scoped Environmental Impact Study (NRSI, May 2025)
2. Landscape Plan (MHBC, 29 July 2025)
3. Tree Preservation Plan (NRSI, 5 September 2025)
4. Comment Response Matrix (April 2025)

We offer the following comments, structured according to the Township's request.

1. Determination of Completeness

Complete.

2. Additional Requirements

n/a

3. Application Support - If the application can be deemed complete, then are you in support of the application?

Yes.



4. If you support the application - What condition(s) of approval are required to be included in the site plan agreement?

Enhancement/Restoration Plan for lands on the proponent's property following the direction provided in Section 7.6 of the scoped EIS, and as conceptualized on EIS Map 4.

5. If you cannot support the application - why?

n/a

6. Are there any technical items required to support the application?

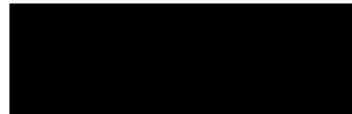
All technical comments on the 1st submission have been adequately addressed in the applicant's comment response matrix and revised materials. For continuity purposes, comment responses are included in Appendix A.

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



APPENDIX A. COMMENT RESPONSE MATRIX

Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
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 (<i>Asclepias syriaca</i>) 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 7.6 in the EIS report has been updated to include enhancement recommendations, including seeding with a native species mix including Common Milkweed in the cultural meadow ecosites.	Addressed.
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	NRSI maintains that the subject property should not be considered a candidate SWH for turtle nesting, but can increase to Possible within the Subject Property to match the Study Area. No evidence of turtle nesting has been observed at the site and similar to the exclusion of road shoulders or embankments, man-made parking areas are not suitable to be significant wildlife habitat areas. It is possible that the occasional turtle may try to nest in the area, therefore mitigation has been provided.	Addressed.



Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
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.	<p>Map 3 shows locations of sediment/turtle exclusion fencing as provided by MTE's ESC plan.</p> <p>Section 7.4.3 of the EIS report updated to specify that sediment fencing should be established prior to grading activities.</p> <p>NRSI provides a SAR/SCC (Wildlife) encounter protocol for any herpetological SAR/SCC encounters that occur on site in an appendix included in the updated EIS.</p>	
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	Site assessment by NRSI arborist only identified one tree adjacent to but outside of the subject property at potential risk. NRSI prepared a brief TPP.	Addressed. The TPP is acceptable.



Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
where possible.” A Tree Preservation Plan should be prepared		
Section 7.4.1 - Please show the recommended Erosion & Sediment Control/Wildlife Exclusion Fencing on an EIS figure.	NRSI provides sediment and exclusion fencing locations as a layer within Map 3 of the EIS report.	Addressed.
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 <i>Asclepias syriaca</i> - Monarch host plant, which was documented in the Cultural Meadow proposed to be impacted).	NRSI includes a conceptual enhancement plantings area in an attached map (Map 4), and includes Common Milkweed within a list of species to be included in a native seed mix for the cultural meadow ecosite. Section 7.6 in the EIS report updated to include enhancement recommendations.	Addressed. Enhancement/Restoration Plan required for lands on the proponent’s property following the direction provided in Section 7.6 of the scoped EIS, and as conceptualized on EIS Map 4.
Section 8.0 - a summary of enhancement recommendations should be included in addition to the mitigation measures.	NRSI updated Section 8 to include details for the proposed enhancement plantings.	Addressed.
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	NRSI updated Significant Wildlife Screening Table Appendix to include Woodland Area- Sensitive Bird Breeding Habitat	Addressed.



Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
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	Jefferson Salamander requires fishless wetlands or vernal pools for breeding and deciduous or mixed forest for overwintering and foraging. They will travel through a variety of habitats to reach breeding or overwintering areas. The wooded natural area adjacent to the subject property may provide suitable habitat for this species. Movement through the subject property is unlikely given the nature of the site (open, exposed, etc.) and would likely be limited to nighttime hours during warm, rainy nights in March-April and September-October. Sediment and erosion control fencing encircling the work area is considered sufficient mitigation to prohibit salamanders from	Addressed.



Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
	<p>entering the work area.</p> <p>NRSI included Jefferson's Salamander within the Species at Risk (SAR) Encounter Protocol and provided avoidance and mitigation recommendations in the event that the species is observed within the work area or adjacent lands.</p>	
<p>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).</p> <p>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.</p>	<p>NRSI updated Map 2 to include a revised natural feature buffer that amalgamates the 10m woodland and 30m PSW buffer to show the greatest buffer extent along the natural feature. Section 6.0 of the EIS reported updated to provide rationale for the revised buffer.</p>	<p>Addressed.</p>
<p>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</p>	<p>Where applicable, non-native cultivars have been replaced with equivalent native counterparts.</p>	<p>Addressed.</p>



Dougan Ecology 1 st Submission Comment (May 12, 2025)	NRSI Response	Dougan Ecology Response (Sept. 26, 2025)
<p>the species list is revised to replace non-native/cultivars with suitable native species to maintain and enhance biodiversity.</p> <p>Suggestions for native replacement species are included in Table 1</p>		

