

Our ref: 11210029

12 January 2026

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2374868 Ontario Inc.
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N3C 2V4

**Response to Review of Temporary Use by-Law Amendment Application
Ecology Technical Comments – 6678 Wellington Road 34, Puslinch, Ontario**

Dear Frank

GHD Limited (GHD) has prepared this letter to provide responses to comments to a Dougan Ecology Letter dated October 31, 2025 on the provided documents for the above-referenced Application. For convenience, each comment has been copied in italics below and our response follows the comment.

The Applicant/GHD notes that the proposed operation is located within a larger area that is zoned and operates in accordance with an Aggregate license issued by the Ontario Ministry of Natural Resources (MNR). As such, potential ecology items are addressed by the aggregate zoning and the associated MNR approved Rehabilitation Plan for the area. The Rehabilitation Plan includes specific woodlands and ponds which have been in place for a number of years and are maintained as required by the Plan.

Comment 1

Response to previous ecology comments #1 and 9 (March 14, 2023).

Response Letter Page 2 states “As the proposed temporary use for a portion of the Site is the same as the permanent use as previously proposed, policy compliance as discussed in the EIA (GHD, August 2022) remains the same.” Dougan’s previous comments #1 and #9 (March 14, 2023) requested a clear demonstration of policy compliance with the County’s Greenlands and Core Greenlands policies, which were not addressed in the Response Letter. We request a formal response to these comments (noted below) demonstrating the proposal is compliant with the County’s natural heritage policy:

- *The Wellington County Official Plan (OP) - Schedule A7 Puslinch - designates the Subject Lands as “Greenlands”. Section 5.6.1 of the OP, Permitted Uses, does not allow Commercial Uses in the Greenlands designation and under Section 5.6.4, Zoning, it suggests Greenlands be given a restrictive zoning by a municipal council. Please demonstrate how the proposed Zoning Amendment is compatible with the portions of the site designated as Core Greenlands.*

Response 1

A review of Schedule B7 Puslinch within the current County of Wellington Official Plan (November 2025) designates the majority of the Subject Lands as “Secondary Agriculture” with a small “greenlands” designation jutting into the Subject Lands and directly adjacent along the eastern property boundary. Greenlands as outlined in Section 5.5 of the County of Wellington Official Plan (2025) are designated as *habitat, areas of*

natural and scientific interest, streams and valleylands, woodlands, environmentally sensitive areas, ponds, lakes and reservoirs and natural links. Section 5.6.7 of the County of Wellington Official Plan outlines the mapping identifying core greenlands and greenlands on various schedules to this Plan may need to be refined by more detailed mapping on individual sites. Where more detailed mapping is available, minor adjustments may be made without an amendment to this Plan and the land use policies of the adjacent designation will apply as determined by Council.

The greenlands boundary to the east was confirmed and refined in the field by GHD biologists and was found to follow the existing woodland boundary which was outside of the proposed Operational Area.

Core greenlands as identified in Section 5.4 of the County of Wellington Official Plan (2025) include provincially significant wetlands, all other wetlands, habitat of endangered or threatened species and fish habitat and hazardous lands. Based on the above definition no core greenlands were identified within the proposed Operational Area. The Operational Area was comprised of disturbed area as detailed in the EIA (GHD, 2022). The Operational Area subject to the Zoning By-Law Amendment is outside of the field verified greenlands designated feature, however portions are within the adjacent lands (within 30 meters). The EIA (GHD, 2022) outlines mitigation measures including a 10-meter buffer from the eastern woodland and silt fencing which will provide protection to the greenlands feature (woodland). No negative impacts are anticipated as a result of the hydrovac operations as demonstrated by the EIA (GHD, 2022) and therefore the proposed use will be in compliance with Sections 5.6.1 and 5.6.4 of the Wellington County Official Plan (2025). The hydrovac operation historically operated for many years without documented impacts to the surrounding areas including the adjacent woodland. In fact, the Applicant has provided support for the eastern woodland operations over the years as a good neighbour.

- ***Greenland System features identified in the EIA include: environmentally sensitive areas and significant woodlands. Floodplain and wetlands are also present on abutting lands owned by the County. Please review and demonstrate compliance with all of the applicable policies in Part 5 of the County Official Plan (i.e. 5.4.1, 5.4.3, 5.5.4, 5.5.5).***

The proposed use of a hydrovac facility is in compliance with the policies in Part 5 of the County Official Plan (i.e. 5.4.1, 5.4.2, 5.4.3, 5.5.1, 5.5.2, 5.5.4, 5.5.5). In accordance with Section 5.4.1 no wetlands were identified within the Subject Lands, Operational Area or adjacent lands (within 30 meters) therefore the hydrovac use is in compliance with Section 5.4.1 of the County of Wellington Official Plan (2025).

Section 5.4.2 identifies no development or site alteration allowed within significant habitat of endangered or threatened species. The hydrovac Operational Area will not be located within significant habitat of endangered or threatened species. Potential habitat for endangered or threatened species was identified on the Subject Lands and included potential roosting habitat for Species at Risk bats and bobolink (*Dolichonyx oryzivorus*) habitat. The potential roosting habitat was located outside of the Operational Area and within the south-western forest (FOD5). No tree removal is proposed as part of the continued use of the Subject Lands as a hydrovac business and the 5 cavity trees (determined to be low quality habitat) will not be negatively impacted as a result of the continued use. Bobolink habitat was identified within the agricultural fields as described in the EIA (GHD, 2022). The agricultural fields were located outside of the Operational Area and approximately 100 meters north. This area will continue to be farmed with no negative impacts to bobolink as a result of the proposed hydrovac operations. As demonstrated in the EIA (GHD, 2022) no negative impacts are anticipated on the habitat of threatened and/or endangered species as a result of the hydrovac operations therefore in compliance with Section 5.4.2 of the County of Wellington Official Plan (2025).

Section 5.4.3 of the County of Wellington Official Plan (2025) identifies hazardous lands as those subject to flooding hazards and erosion hazards or unsafe for development or site alteration due to naturally occurring hazards. No hazardous land designations were identified within the Operational Area, nor do any lands within the Operational Area meet the definition as identified within the Wellington County Official Plan (2025) therefore the proposed hydrovac use is in compliance with Section 5.4.3 of the County of Wellington Official Plan (2025).

Section 5.5.1 identifies development and site alteration shall not be allowed in significant wildlife habitat [SWH] unless it's been demonstrated that there will be no negative impacts on the habitat or ecological functions. The EIA (GHD, 2022) identified five potential and/or confirmed SWH within the Subject Lands (Woodland Area-Sensitive Bird Breeding Habitat, Amphibian Breeding Habitat (Woodland), Special Concern and Rare Wildlife Species, Deer Winter Congregation Areas and Bat Maternity Colonies). No SWH was identified within the Operational Area and as demonstrated in the EIA (GHD, 2022) no negative impacts to SWH are anticipated and, therefore, the proposed operation will be in compliance with Section 5.5.1 of the Wellington Official Plan (2025).

Section 5.5.2 identified both provincially and regionally significant Areas of Life Science or Earth Science Natural and Scientific Interest [ANSI] will be protected from development or site alteration which would have a negative impact on the natural features or its ecological function. The regional ANSI boundary was determined to follow the eastern woodland boundary/greenlands boundary. As demonstrated in the EIA (GHD, 2022), the ANSI will be protected by the 10-meter buffer and silt fencing. No negative impacts will occur to the ANSI or its ecological functions. The Operational Area is outside of the ANSI boundary and therefore is in compliance with Section 5.5.2 of the County of Wellington Official Plan (2025).

Section 5.5.4 of the County of Wellington Official Plan identifies criteria for significant woodlands. One woodland within the Study Area was considered significant woodland (eastern woodland) and was included in the greenlands system. The proposed Operational Area is outside of significant woodland, with a 10-meter buffer and silt fencing implemented for protection. As demonstrated in the EIA (GHD, 2022) no development or site alteration is proposed within this woodland and no negative impacts will occur on the woodland or its ecological functions as a result of the hydrovac use therefore in compliance with section 5.5.4 of the County of Wellington Official Plan (2025). The hydrovac operation historically operated for many years without documented impacts to the surrounding areas including the adjacent woodland. In fact, the Applicant has provided support for the eastern woodland operations over the years as a good neighbour.

Section 5.5.5 of the County of Wellington Official Plan defines Environmentally Sensitive Areas as those areas determined by the County from previous studies and included in the greenlands system. No Environmentally Sensitive Areas were identified within the Operational Area and, therefore, the proposed operation will be in compliance with Section 5.5.5 of the County of Wellington Official Plan (2025).

Comment 2

End use Restoration/Enhancement Plan capturing proposed woodland edge enhancements noted in the addendum and additional strategies, as applicable.

Response 2

GHD will complete a Restoration/Enhancement Plan once the zoning application is approved and the Applicant proceeds to Site Plan Approval. The Restoration/Enhancement Plan will identify seeding/planting locations, application timing and topsoil requirements.

Comment 3

Performance Monitoring Plan for silt/exclusion fencing to ensure mitigations (silt/exclusion fencing, barriers) are functioning as intended and repaired where required.

Response 3

A Performance Monitoring Plan for silt/exclusion fencing will be completed to ensure mitigations are functioning as intended and repaired where required once the zoning application is approved and the Applicant proceeds to Site Plan Approval. The Performance Monitoring Plan will identify timing and frequency of the required monitoring, qualifications on personnel undertaking the monitoring and the location of the monitoring.

Should you have any questions, please contact the undersigned.

Regards



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