Monika Farncombe

From: Summer Graham <sgraham@dougan.ca>
Sent: November 13, 2026 8:29 AM
To: Monika Farncombe
Cc: Todd Fell
Subject: RE: 30 Winer Road - Site Alteration Permit Application

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Good morning, Monika,

We have reviewed the addendum provided by Cambium and don't see a need for further revisions. We have no further natural heritage comments, subject to implementation of the EIS and addendum recommendations. Note that the additional snake protection measures should be carried forward into the construction requirements.

Please let me know if you have any additional questions, and have a great weekend!

best,

Summer

Summer Graham (she/her), B. Sc., Eco. Mgmt. Tech., ISA
Manager of Ecology

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3 - 7 Edinburgh Rd S, Guelph, ON N1H 5N8
P 519-822-1609 sgraham@dougan.ca

From: Monika Farncombe <mfarncombe@puslinch.ca>
Sent: Tuesday, November 10, 2026 1:40 PM
To: Summer Graham <sgraham@dougan.ca>
Cc: Todd Fell <tfell@dougan.ca>
Subject: FW: 30 Winer Road - Site Alteration Permit Application

Hi Summer,
See attached for review and comments on P11-RAN – 30 Winer Rd. Can you please provide comments back by Nov 24th?
Thank you,

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November 10, 2026

Township of Puslinch
7404 Wellington Road 34
Puslinch, Ontario N0B 2J0

Attn: Monika Farncombe, Planning and Corporate Services Coordinator

Re: EIS Addendum – Response to Technical Comment 7 (SWH Screening)
30 Winer Road, Township of Puslinch (P11-RAN)
Cambium Reference: 02635851.000

Dear Ms. Farncombe:

Cambium Inc. (Cambium) was retained by Randhawa Property Inc. (the Client) to prepare an Environmental Impact Study (EIS) in support of a Major Site Alteration Permit application for 30 Winer Road in the Township of Puslinch (the Site). The EIS was first submitted on September 24, 2026 and was revised and resubmitted with a Comment Response Matrix on October 23, 2026 in response to the ecology comments provided by Dougan on October 6, 2026.

Dougan's second-round review (November 4, 2026) confirmed that all previous key and technical comments have been satisfactorily addressed, with the exception of Technical Comment 7 regarding the screening of candidate Significant Wildlife Habitat (SWH). Dougan recommended that this comment be addressed through a brief letter addendum, noting that a further revision to the EIS is not considered necessary provided the addendum demonstrates that the conclusions of the EIS remain valid and that no substantive changes to the proposed works or recommended mitigation measures are required. This letter provides that addendum and should be read in conjunction with the revised EIS (October 23, 2026).

OUTSTANDING COMMENT – TECHNICAL COMMENT 7

> *"The revised SWH screening has addressed most of our previous concerns. However, additional clarification is required regarding the exclusion of candidate terrestrial crayfish habitat and snake hibernacula. The EIS identifies swamp communities that may provide*

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> *suitable habitat for terrestrial crayfish, while potential snake hibernacula may occur in a variety of habitat types where suitable overwintering features are present. Please provide the site-specific rationale for screening out these habitat categories or, where potential habitat cannot reasonably be excluded, consider them as candidate SWH in the impact assessment." – Dougan, November 4, 2026*

RESPONSE

Candidate SWH is identified where the ecosites and/or habitat features listed in the Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E (MNRF, 2015) are present; confirmation would require species-specific surveys during the appropriate season. As such, the EIS used a habitat-based approach supported by the September 2, 2026 field investigation, and targeted spring or fall surveys for terrestrial crayfish and snake hibernacula were not completed. Both habitat types have therefore been examined based on site conditions documented by Cambium and our understanding of the proposed activities.

TERRESTRIAL CRAYFISH

Candidate habitat in Ecoregion 6E includes meadow marsh, shallow marsh, thicket swamp, and deciduous or mixed treed swamp (MAM1-6, MAS1-3, SWT, SWD, SWM), as well as cultural meadow containing marsh or swamp inclusions. The listed species are Chimney (Digger) Crayfish (*Fallicambarus fodiens*) and Devil (Meadow) Crayfish (*Cambarus diogenes*), and confirmed SWH requires one or more individuals or their chimneys. The criteria schedule notes that Canadian populations are limited to southwestern Ontario.

Four communities on and adjacent to the Site correspond to candidate ecosites: Willow Mineral Thicket Swamp (SWT2-2; Community 1), White Birch–Poplar Mineral Deciduous Swamp (SWD4-3; Community 2), Silver Maple Deciduous Swamp (SWD3-2; Community 4) and Cattail Mineral Shallow Marsh (MAS2-1; Community 8). Communities 1, 2, and 4 form part of the Mill Creek Puslinch Provincially Significant Wetland (PSW) along the northern limit of the Site, and

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Communities 1 and 8 also occupy the low-lying depression to the southeast delineated by Cambium (EIS Section 4.4.2; Figure 2). The site-specific considerations are:

- No records of either species were identified through the background information review (EIS Section 3.1, Table 2).
- No crayfish chimneys were documented during the September 2, 2026 field investigation, which included wetland boundary delineation and hand-auger soil sampling along the wetland edges. A single late-summer visit is not sufficient to rule out presence, as chimneys are most reliably detected in spring.
- The area of soil removal (Communities 5 and 6) is elevated, placed granular and soil fill within an active industrial yard. It lacks the saturated, fine-textured soils and shallow water table needed by burrowing crayfish and is not a candidate ecosite.

Determination: Because candidate ecosites are present and targeted surveys were not completed, Communities 1, 2, 4 and 8 are conservatively identified as Candidate Terrestrial Crayfish SWH. Candidate habitat is limited to these wetland communities and does not extend into the area of soil removal.

Impact assessment: All candidate habitat lies outside the area of soil removal and the limit of erosion and sediment control (ESC) measures (see EIS Figure 3). As described in Section 5.1 of the EIS, no clearing, grading, filling or drainage modification is proposed within wetland habitat, and no dewatering, water taking or alteration of surface drainage is proposed. The saturated soil and groundwater conditions on which burrowing crayfish depend will therefore be maintained. A double row of silt fence with straw bale reinforcement along the wetland interface will prevent sediment deposition and encroachment. No direct impact or habitat fragmentation is anticipated. Fill removal adjacent to this habitat represents a temporary, indirect disturbance, and the subsequent restoration will improve habitat function and buffering over the long term. Adverse effects on candidate

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terrestrial crayfish habitat are therefore not anticipated, provided mitigation measures outlined in the EIS are implemented.

REPTILE HIBERNACULUM (SNAKES)

Candidate snake hibernacula in Ecoregion 6E may occur in any ecosite other than very wet ones where there are features with openings extending below the frost line. These include broken or fissured bedrock, burrows, rock piles or slopes, old stone fences and crumbling foundations. Candidate hibernacula may also occur in some wetlands (conifer or shrub swamps and swales, poor fens, or depressions in bedrock terrain with sphagnum or sedge hummock ground cover). Confirmed SWH requires five or more individuals of a species, snakes of two or more species, or a Special Concern species observed near a potential hibernaculum during spring or fall.

For the purposes of this assessment, the proposed disturbance area corresponds to the restoration area shown on Figure 3 of the EIS, which encompasses the area of soil removal (0.24 ha) and the limits of ESC measures, together with the 0.0331 ha woodland edge. The following site-specific conditions indicate that suitable hibernation features are not present within this area:

- **Historical and Ongoing Disturbance:** The area of soil removal consists of fill placed and reworked since approximately 2010 within an active industrial yard used for transport truck parking and storage. Snakes show strong fidelity to hibernacula and typically rely on long-standing, stable subsurface features (e.g., fissured bedrock, settled rock voids, decayed root channels and established burrow systems). Recently placed and frequently disturbed fill does not provide this type of persistent structure.
- **Frost Penetration:** The fill surface is compacted by vehicle traffic and is largely unvegetated or sparsely vegetated, with limited leaf litter or insulating ground cover. These conditions allow deeper frost penetration than in the adjacent woodland, reducing the likelihood that any voids within the fill extend below the frost line.

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- **Slope Stability and Orientation:** The northern fill slope is actively eroding through rill and gully erosion (EIS Photo 13). The slope surface is continually reshaped, so any shallow openings that form are short-lived and unsuitable as recurring overwintering sites. The slope is also predominantly north-facing, toward the wetland, and provides limited solar exposure for basking at emergence and ingress.
- **Field Observations:** No bedrock outcrops, talus, rock piles, stone fences, foundations or mammal burrows were documented within the proposed disturbance area. The surface materials present, including precast concrete barriers, tires and wooden debris, rest on the compacted surface and do not provide access below the frost line. No snakes were observed during the field investigation, although it is recognized targeted surveys were not completed.
- **Footprint Size:** The 0.0331 ha woodland edge proposed for alteration is located immediately below the fill slope and consists of young to mid-aged, early successional trees. Given the small footprint, this area was examined in detail during the field investigation, and no burrows, stump or root cavities, rock or debris piles, or other potential hibernation features were identified.

In contrast, conditions within the retained woodland (Communities 3 and 10) beyond the disturbance area and the thicket swamp (Community 1) are more favourable for overwintering snakes.

Determination: Snake hibernacula are considered absent within the proposed disturbance area (restoration area and woodland edge). The retained woodland (Communities 3 and 10) and thicket swamp (Community 1) on the Site and adjacent lands are conservatively identified as Candidate Snake Hibernacula SWH.

Impact assessment: Candidate habitat is located outside the proposed disturbance area, within retained woodland and wetland communities. These communities will be protected by the tree protection fencing specified in the TIPP and by the ESC measures along the woodland and wetland interface, and no grading, clearing or equipment access is proposed within them. The woodland

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alteration is limited to 0.0331 ha of disturbed edge habitat, which is less than 0.01% of the approximately 401 ha contiguous woodland, and does not extend into interior woodland or wetland habitat. Restoration activities will replace exposed fill with native vegetation adjacent to the retained woodland, which is expected to improve edge conditions over time.

Hibernacula are not expected within the disturbance area. However, snakes may move through or shelter in the work area during the active season, so the following precautionary measures are recommended to avoid harm to individuals:

- Trees within the woodland edge are to be removed during the inactive bat window (December 1 to March 14) by cutting at or near grade. Stumps and root systems are to be left in place. Fill removal within the woodland edge is to be limited to placed fill above the original ground surface, with no grubbing or excavation into native soils. Retaining stumps will also help stabilize soils and support restoration plantings. If stump removal or excavation into native soils within the woodland edge is unavoidable, that portion of the work is to be deferred to the snake active season (generally May 1 to September 30), when snakes have left their overwintering sites.
- Before works begin, tree protection fencing and ESC measures are to be installed as specified. No equipment access, grading or stockpiling is to occur within the retained woodland and wetland communities where candidate hibernacula may occur.
- Surface materials within the area of soil removal (tires, pallets, concrete barriers and stockpiled debris) rest above the frost line and do not provide overwintering conditions, so they may be removed during the winter works. Each item should still be lifted and checked before removal.
- If a dormant snake is uncovered during the works, work in that location is to stop. The snake is to be left in place and covered to protect it from exposure, and a qualified ecologist is to be contacted for direction before work resumes in that area. Species at risk observations are to be reported as outlined in Table 6 of the EIS.

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- If works extend into the snake active season (generally mid-April onward), the contractor is to complete a visual sweep of the work area at the start of each work day, and any snakes encountered are to be allowed to leave the work area on their own. If five or more snakes of one species, or snakes of two or more species, are observed congregating near a ground feature during spring or fall, works near that feature are to stop and a qualified ecologist is to be contacted to determine whether further mitigation is required.

Table 1 Summary of Revised SWH Screening

SWH Type	EIS: Appendix D (Oct. 23, 2026)	Revised Screening (November 9, 2026)	Relationship to Proposed Works
Terrestrial Crayfish	Absent	Candidate – Wetland Communities 1, 2, 4 and 8 on Site and adjacent lands; absent within the area of soil removal.	Outside the area of soil removal and ESC limits; no wetland encroachment, drainage alteration or dewatering. No adverse effects anticipated.
Reptile Hibernaculum (Snakes)	Absent	Candidate – Retained woodland (Communities 3 and 10) and thicket swamp (Community 1); absent within proposed disturbance area.	Outside the proposed disturbance area; protected by TIPP fencing and ESC. Precautionary timing and construction measures to be applied. No adverse effects anticipated.

CONCLUSION

Based on the site-specific review above, terrestrial crayfish habitat and snake hibernacula have been reviewed as candidate SWH types. No confirmed SWH has been identified. Both candidate habitat types are confined to retained wetland and woodland communities outside the proposed disturbance area, and the proposed works are unchanged. The mitigation measures outlined in the EIS remain appropriate, including the ESC measures, tree protection measures, seasonal timing windows, and restoration plantings. These measures are supplemented by the precautionary snake measures described above, which do not change the proposed works.

The conclusion of the EIS that significant adverse impacts to the form or function of SWH are not anticipated therefore remains valid. We respectfully request that Technical Comment 7 be considered resolved.

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November 10, 2026

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned if you have any questions or require further information.

Best regards,

Cambium Inc.

Signed by:

[redacted]

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Camden Jermey, B.Sc., Can-CISEC
Project Manager / Senior Ecologist

CJ

Encl. *Statement of Qualifications & Limitations*

Copies: *Randhawa Property Inc.*
Summer Graham and Todd Fell, Dougan & Associates

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