
FW: Environmental Comments - 772082 Highway 10 - File No. 42-07-090-OPA-31 / OPA1-26

From Scott Taylor <[REDACTED]>
Date Wed 7/8/2026 3:53 PM
To Dafne Gokcen <[REDACTED]>; Adam Fiorini <[REDACTED]>
Cc Ken Melanson <[REDACTED]>; Victoria Mance <[REDACTED]>; Bill White <[REDACTED]>

 1 attachment (330 KB)
SNGRLREnvironmentalLevyPolicy Final060425.pdf;

FYI – see the below and attached from the Six Nations of the Grand River.

Scott Taylor, MCIP, RPP, (He/Him)
Director of Planning and Development
Phone: +1 548-877-0856



From: Colton Longboat <[REDACTED]>
Sent: July 8, 2026 3:38 PM
To: Scott Taylor <[REDACTED]>; Ken Melanson <[REDACTED]>
Cc: Peter Graham <[REDACTED]>
Subject: Environmental Comments - 772082 Highway 10 - File No. 42-07-090-OPA-31 / OPA1-26

You don't often get email from luast@sixnations.ca. [Learn why this is important](#)

[EXTERNAL EMAIL]

Dear Scott and Kenneth,

My name is Colton, and I am a Land Use and Stewardship Technician with the Consultation and Accommodation Process Team at the Six Nations of the Grand River Elected Council (SNGREC)'s Lands and Resources Department.

Included below are my comments on the proposed development at 772082 Highway 10, South Gate, Grey County.

Haldimand Tract and 1701 Nanfan Treaty Preamble

Haldimand Tract and the lands covered under the 1701 Nanfan Treaty are situated within Six Nations territory, where development has proceeded without the prior consent of Six Nations of the Grand River (SNGR). This has resulted in impacts on lands, waters, and ecological systems that are foundational to Haudenosaunee culture, subsistence practices, harvesting, and land-use rights. These

impacts occur within the context of unresolved land claims and the ongoing recognition of Aboriginal and Treaty rights, as affirmed under section 35 of the Constitution Act, 1982.

Six Nations of the Grand River Environmental Levy Policy

In accordance with the Six Nations Environmental Levy Policy, proponents are required to ensure that all project-related environmental impacts are appropriately avoided, minimized, and, where unavoidable, fully addressed through restoration, habitat replacement, monitoring, and other forms of compensation. These requirements are intended to ensure that ecological systems, including lands, waters, and species within Six Nations of the Grand River territory, are protected and sustained. Proponents are expected to incorporate these obligations into all stages of project planning, design, and implementation, and to engage in meaningful consultation to ensure that impacts to Six Nations of the Grand River rights and interests are appropriately recognized and addressed.

Please consult the attached SNGREC Levy Policy, approved by the Elected Council.

Woodland Removal and Tree Compensation

SNGREC requests that the proponent make every reasonable effort to retain existing trees through site design. This is especially important for mature trees and woodland edges, which provide habitat, support ecological connections, and contribute to the overall function of the natural heritage system.

Where tree removal cannot be avoided, SNGREC requests a 10:1 tree replacement ratio for all trees removed, regardless of diameter at breast height (DBH). SNGREC also requests a 1:1 replacement ratio for any standing snags or dead trees removed, as these features continue to provide valuable wildlife habitat.

A higher replacement ratio helps restore lost ecological functions, account for tree mortality, and support long-term ecological resilience. All replacement trees should be native, site-appropriate species and should be planted as close as reasonably possible to the impacted area.

If on-site planting is not possible, SNGREC requests that offset planting occur as close as reasonably possible to the development area. SNGREC also encourages the proponent to work with the Grand River Conservation Authority or the local Conservation Authority to identify suitable planting locations. If appropriate locations cannot be secured, SNGREC requests a cash-in-lieu contribution through SNGREC's Environmental Levy Policy to support tree planting and ecological restoration initiatives with equivalent environmental benefits. SNGREC will plant trees that are not full caliber, resulting in a cost of about \$35 per tree planted.

Inadequate Environmental Buffers

The proposed buffer widths do not meet SNGREC's environmental expectations and may not provide enough protection for the natural heritage features on site.

The Environmental Impact Study (EIS) proposes a 30-metre setback from the Provincially Significant Wetland and a 5-metre setback from portions of the Significant Woodland. SNGREC believes the proposed setbacks may not be sufficient to protect ecological functions, wildlife movement, and long-term ecosystem resilience.

In accordance with SNGREC's Environmental Levy Policy, SNGREC requests that the proponent increase ecological buffers around retained woodlands, wetlands, and other natural heritage features.

Specifically, SNGREC requests a minimum 41-metre buffer from the Provincially Significant Wetland to better protect the wetland and its associated ecological functions. Regarding the significant woodlands, SNGREC requests a minimum 15-metre fenced buffer or a 25-metre unfenced buffer to reduce edge effects, limit human disturbance, and maintain long term ecological integrity.

Wildlife Surveys and Habitat Use

SNRGEC has identified that the completed wildlife surveys are insufficient to fully understand wildlife use of the site and assess potential impacts to wildlife, habitat connectivity, and SNGREC Treaty Rights.

The concern is raised by the documented presence of the white-tailed deer and other wildlife species, as well as the proposed permanent removal of woodland habitat. The loss of wildlife habitat may affect wildlife movement, species availability, and long-term sustainability of resources relied upon for SNGREC cultural practices, including harvesting and hunting activities.

SNGREC requires additional information to better understand current wildlife use of the site and the potential impacts to wildlife movements. SNGREC requests that additional targeted surveys be completed, including mammal track surveys and trail camera monitoring.

Long-Term Monitoring

The EIS proposes restoration and mitigation measures; however, it does not include a clear framework for long-term monitoring studies. SNGREC recommends that the proponent complete multi-season, multi-year monitoring program for a minimum of 5 years to assess whether restoration areas, compensation plantings, and mitigation measures are working as intended. These studies should consider vegetation survival, invasive species, wildlife use, and overall habitat conditions following construction activities. SNGREC requests that the results be shared for review and used to determine whether additional mitigation, restoration, or compensation measures are needed.

I look forward to the proponent's response and clarification on these matters.

Nia:wen/Nya:wəh – Thank you,

Colton Longboat

Lands Use and Stewardship Technician

Six Nations of the Grand River (SNGR)

Lands and Resources

LUAST@sixnations.ca