

# Internal memo

Development Services Department



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**Date:** 14 July 2025

**To:** Andrew Pinnell, Kitchener Planning  
Laura Lawlor / Katherine Ryan, GHD  
Rebecca Egger / Brandon Flewwelling, GSP

**From:** Barbara Steiner, Senior Environmental Planner

**cc:** Chris Foster-Pengelly, Grand River Conservation Authority  
Carol Bacon / Josh Shea, Kitchener Parks and Trails  
Eric Riek, Kitchener Engineering

**Subject:** Draft Plan of Subdivision Application 30T-23201  
1700 Strasburg Road – Mill-Gate Holdings Inc.

*Amended Scoped Environmental Impact Study. 28 Mar 2025. GHD*  
*Arborist's Report and Vegetation Management Plan. 17 Mar 2025. GSP*  
*MECP Permit WC-C-006-23 under the Endangered Species Act (ESA). 28 Jan 2025*

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City Environmental Planning staff has reviewed the (environmental) supporting documentation noted above as well as relevant portions of:

- *Functional Servicing & Stormwater Management Report, Gateman-Milloy Inc. Strasburg Road Technology Business Park. WalterFedy. October 21, 2022.*

## **Subject Property and Environmental Policy Framework**

The subject property is adjacent to a Regionally Significant Woodland within the City-owned Huron Natural Area (HNA) to the west which also contains the Strasburg Creek Provincially Significant Wetland (PSW) Complex. Both features are part of the non-developable Kitchener Natural Heritage System (KNHS), and for which an Environmental Impact Study (EIS) is therefore required when development is proposed adjacent. In addition, a record of Blandings Turtle, a Provincially Threatened species, overwintering in a pond in the HNA means that an Overall Benefit Permit (under Section 17(1) and Clause 17 (2) (c) of the ESA) was required from the Province in order to remove some (potential) Category 3 habitat of the species on the subject property; conditions of this permit must be implemented through the development process. No permissions under the ESA were required by the Province for three Endangered bat species (presence not confirmed) due to the limited and low value of the roosting habitat on the subject property (one tree).

Despite the history of disturbance on the lands, through the field work for the EIS, habitat of some species of Special Concern was identified on the subject property for which conditions of approval are required in order that mitigation is implemented through the development process. These species are the Snapping and Midland Painted Turtle and the Grasshopper Sparrow. The presence and habitat of terrestrial Chimney Crayfish was confirmed, its habitat considered Significant Wildlife Habitat which will be incorporated in the created habitat Block 11 in the northwest corner of the property.

Mitigation measures to be implemented include: buffers / setbacks / enhancement planting adjacent to the woodland and wetland in the HNA to the west; temporary and permanent wildlife exclusion fencing; wetland and terrestrial habitat creation in Block 11 including protected turtle nesting and basking areas; the creation of a wildlife corridor in Block 12 including passage under the extension of McBrine Drive; timing restrictions on vegetation removal to protect Species at Risk and of Special Concern; awareness training for on-site contractors / construction workers; and stewardship and education of new industrial lot owners.

## **Comments and Conditions**

### **Natural Heritage System**

- 1. City Environmental Planning supports the Draft Plan of Subdivision. It is now supported by an updated *Amended Scoped EIS* (GHD 28 Mar 2025) and the Overall Benefit Permit under the Ontario Endangered Species Act in respect of (potential) habitat for Blandings Turtle has been issued by the Minister of Environment, Conservation and Parks (28 Jan 2025).**
2. The submission of the environmental supporting documents noted above meets the requirements for an Environmental Impact Study required by the Kitchener Official Plan, and responds thoroughly to City Environmental Planning's comments dated 12 December 2024. The submission of the Arborist's Report and Vegetation Management Plan also generally meets the requirements for a *General Vegetation Overview* (GVO) as required by Kitchener's Council-adopted *Tree Management Policy* (rev. 2001) with some caveats on methods and conclusions given below.
3. Southwest corner of Draft Plan, **Lots 8-10 abutting the NHA** – Different figures and drawings attached to the EIS or Permit WC-C-006-23 depict **permanent chainlink with attached wildlife exclusion fencing** in an **incorrect location**. This fencing is to be just onto (e.g. 12 inches) the created Block 11 which is to be conveyed into City ownership as an extension of the adjacent HNA. The setback/buffer is to be the subject of a detailed enhancement planting plan in the design stage after Draft Plan approval. The rear property boundary limit shape should be conducive to the installation / relocation of this fence / boundary marker system.
4. The removal of the herbaceous vegetation in the south field where there is potential for the nesting of the Grasshopper Sparrow should be delayed if possible to coordinate with the bat roost tree removal window at the end of September. Grasshopper Sparrows can be late nesters (even into September). Otherwise, nest sweeps as described in the EIS should be undertaken.

## Sequencing Plan for Site Works and Other Engineering Design Studies

5. The Sequencing Plan attached to the updated EIS and WalterFedy's drawings C2-1, C5-1, and C7.1-4 are acceptable in terms of demonstrating the order of development activities on-site. This does not constitute approval of the engineering details which will be reviewed as part of subdivision design after Draft Plan approval. Timing of these activities is obviously dependent on the date of Draft Plan approval and the several timing windows for wildlife species. Revised sequencing can be reviewed with the detailed design plans, phased for the habitat creation in Blocks 11 and 12 occurring first, and accomplished through normal pre-grading approval policy and methods.
6. The approach to carefully control Erosion and Sedimentation (ESC) is important here due to the sensitive receivers, including the created wetland / upland habitat Block 11 and wildlife corridor Block 12 whose construction is planned to precede grading and servicing of the rest of the subdivision (Lots 1-10 and roads and trail).

## Monitoring

7. Monitoring concepts outlined in the EIS and ESA permit are acceptable, and are, in addition to Provincial SAR staff, to be copied to GRCA, and City Parks and Environmental Planning staff. Separate monitoring of water management infrastructure, ESC etc. will be required by the City per: conditions of DP approval.

## Tree Management Policy

8. The Arborist's Report and Vegetation Management Plan (GSP) meet the requirements of a General Vegetation Overview supporting the DP application, and the detailed data collection for individual trees already completed can be used to complete the Detailed Vegetation Plan (DVP) required as part of the detailed design phase after DP approval. No trees may be removed until the grading (phased) and coordinated DVP (can be phased) is approved as part of normal pre-grading methods and approvals.
9. Further to 2 above, the priorities for tree retention or compensation are native trees in fair-excellent condition (Hackberry, Eastern Cottonwood), and/or trees identified as habitat for significant species or Significant Wildlife Habitat.
10. The DVP (after Draft Plan approval) must include as per the requirements of the *Tree Management Policy*:
  - a. The surveyed location and elevation of all woodland driplines, component trees of hedgerows, and individual trees retained for further analysis in the DVP;

- b. Permanent fencing and signage recommendations for the woodland / wetland;
- c. Buffer and enhancement area plantings and treatments for the woodland and wetland, and any wildlife habitat creation;
- d. Woodland Management Strategy per: Section 3.3.1.3 of the *Tree Management Policy* which should reference and reflect any approved Stewardship Plan; and
- e. Stewardship brochure for all residents of the subdivision per: Section 3.3.1.3 and Appendix J of the *Tree Management Policy* as discussed in any Stewardship Plan.

Conditions of DP Approval and for Subdivision Agreement

11. Such conditions have been provided directly into a document provided by Andrew Pinnell, under separate cover.

## Andrew Pinnell

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**From:** circulations@wsp.com  
**Sent:** Monday, February 27, 2023 12:48 PM  
**To:** Andrew Pinnell  
**Subject:** Draft Plan of Subdivision (30T-23201); McBrine Dr. & 1700 Strasburg Rd., Kitchener

2023-02-27

Andrew Pinnell

Kitchener

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Attention: Andrew Pinnell

**Re: Draft Plan of Subdivision (30T-23201); McBrine Dr. & 1700 Strasburg Rd., Kitchener; Your File No. 30T-23201**

To Whom this May Concern,

We have reviewed the circulation regarding the above noted application. The following paragraphs are to be included as a condition of approval:

“The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further agrees and acknowledges to convey such easements at no cost to Bell Canada.

The Owner agrees that should any conflict arise with existing Bell Canada facilities where a current and valid easement exists within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost.”

Upon receipt of this comment letter, the Owner is to provide Bell Canada with servicing plans/CUP at their earliest convenience to [planninganddevelopment@bell.ca](mailto:planninganddevelopment@bell.ca) to confirm the provision of communication/telecommunication infrastructure needed to service the development.

It shall be noted that it is the responsibility of the Owner to provide entrance/service duct(s) from Bell Canada’s existing network infrastructure to service this development. In the event that no such network infrastructure exists, in accordance with the Bell Canada Act, the Owner may be required to pay for the extension of such network infrastructure.

If the Owner elects not to pay for the above noted connection, Bell Canada may decide not to provide service to this development.

To ensure that we are able to continue to actively participate in the planning process and provide detailed provisioning comments, we note that we would be pleased to receive circulations on all applications received by the Municipality and/or recirculations.

We note that WSP operates Bell Canada's development tracking system, which includes the intake and processing of municipal circulations. However, **all responses to circulations and requests for information, such as requests for clearance, will come directly from Bell Canada, and not from WSP.** WSP is not responsible for the provision of comments or other responses.

Should you have any questions, please contact the undersigned.

Yours truly,

Juan Corvalan  
Senior Manager - Municipal Liaison  
Email: [planninganddevelopment@bell.ca](mailto:planninganddevelopment@bell.ca)

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## Andrew Pinnell

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**From:** Mike Seiling  
**Sent:** Friday, February 17, 2023 3:51 PM  
**To:** Andrew Pinnell  
**Subject:** FW: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)  
**Attachments:** Standard Agency Circ letter for OPA and ZBA\_McBrine.pdf

Building; no concerns

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**From:** Christine Kompter <Christine.Kompter@kitchener.ca>  
**Sent:** Friday, February 17, 2023 3:40 PM  
**To:** \_DL\_#\_DSD\_Planning <DSD-PlanningDivision@kitchener.ca>; Bell - c/o WSP <circulations@wsp.com>; Carlos Reyes <Carlos.Reyes@kitchener.ca>; Darren Kropf <Darren.Kropf@kitchener.ca>; Dave Seller <Dave.Seller@kitchener.ca>; David Paetz <David.Paetz@kitchener.ca>; Ellen Straus <Ellen.Straus@kitchener.ca>; Enova Power Corp. - Greig Cameron <greig.cameron@enovapower.com>; Enova Power Corp. - Shaun Wang <shaun.wang@enovapower.com>; Feds <vped@feds.ca>; GRCA - Planning (planning@grandriver.ca) <planning@grandriver.ca>; Greg Reitzel <Greg.Reitzel@kitchener.ca>; Hydro One - Dennis DeRango <landuseplanning@hydroone.com>; Jim Edmondson <Jim.Edmondson@kitchener.ca>; Justin Readman <Justin.Readman@kitchener.ca>; Katherine Hughes <Katherine.Hughes@kitchener.ca>; Mike Seiling <Mike.Seiling@kitchener.ca>; Ontario Power Generation <Executivevp.lawanddevelopment@opg.com>; Park Planning (SM) <Park.Planning@kitchener.ca>; Region - Planning <PlanningApplications@regionofwaterloo.ca>; Property Data Administrator (SM) <PropDataAdmin@kitchener.ca>; Robert Morgan <Robert.Morgan@kitchener.ca>; Steven Ryder <Steven.Ryder@kitchener.ca>; Sylvie Eastman <Sylvie.Eastman@kitchener.ca>; WCDSB - Planning <planning@wcdsb.ca>; WRDSB - Board Secretary (elaine\_burns@wrdsb.ca) <elaine\_burns@wrdsb.ca>; WRDSB - Planning <planning@wrdsb.ca>  
**Cc:** Andrew Pinnell <Andrew.Pinnell@kitchener.ca>  
**Subject:** Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Please see attached. Additional documentation can be found in AMANDA folder 23-102603 and [ShareFile](#) (external agencies). Comments or questions should be directed to **Andrew Pinnell**, Senior Planner ([Andrew.pinnell@kitchener.ca](mailto:Andrew.pinnell@kitchener.ca); 519-741-2200 x7668).

### Christine Kompter

Administrative Assistant | Planning Division | City of Kitchener  
200 King Street West, 6<sup>th</sup> Floor | P.O. Box 1118 | Kitchener ON N2G 4G7  
519-741-2200 ext. 7425 | TTY 1-866-969-9994 | [christine.kompter@kitchener.ca](mailto:christine.kompter@kitchener.ca)



Date: April 24, 2025  
To: Andrew Pinnell  
From: Eric Riek  
cc: Chris Spere  
Subject: Draft Plan of Subdivision Application 30T-23201  
Owner: 2140221 Ontario Inc.  
Site Address: McBrine Drive and 1700 Strasburg Road

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Conditions of Draft Plan Approval:

**PART 2      PRIOR TO AREA GRADING of the Subdivision:**

***Include all standard grading conditions 2.1-2.15***

**PART 3      PRIOR TO SERVICING of the Subdivision:**

- Engineering Approvals*      3.1      The SUBDIVIDER shall obtain all engineering approvals from the Ministry of the Environment, the Regional Municipality of Waterloo and the CITY and no servicing work shall commence except in accordance with engineering drawings approved by the CITY'S Director of Engineering Services.
- Securities*      3.3a)      The SUBDIVIDER shall deposit securities in an amount not less than 60 per cent of the estimated cost of the public services set out in Section 1.5, as determined by the CITY'S Director of Engineering Services to ensure satisfactory performance of the SUBDIVIDER'S obligations under this Agreement as they pertain to the public services.
- b) Said security shall be an irrevocable letter of credit or other form of security acceptable to the CITY Solicitor and the CITY'S Treasurer.
- c) The CITY may reduce these securities proportionately when part of the public services are accepted, provided, however, that the reduction shall not result in less than 110 percent of the cost of the following above ground works or \$5000.00 whichever is greater, not yet accepted in accordance with Section 3.3:
- surface course of asphalt, paved driveway ramps, curbs, gutters,

fences, boulevard landscaping including trees and required soil habitat, multi-use pathways, street name signs, traffic control signs, walkways and sidewalks.

*Warranty Period* 3.4 The SUBDIVIDER shall warrant and guarantee and hereby warrants and guarantees all works and services provided for in Section 1.5, against all defects of material and workmanship for a minimum period of 24 months from its completion and acceptance. Acceptance of all services set out in Section 1.5 shall be in writing by the CITY'S Director of Engineering Services or the Engineer of HYDRO under whose control and management the work falls. Underground works, up to and including the first course of asphalt, curb and gutter, may be accepted separately from above ground works. Each above ground work may be accepted on a street by street basis within each Stage.

*Warranty Securities* 3.6 Before release of the security set out in Section 3.3, the SUBDIVIDER shall provide securities in a form set out in Section 3.6 above in an amount equivalent to the value of fifteen percent of the value of works being considered for initial acceptance, or \$5,000.00 whichever is the greater, to support the warranty and guarantee as provided in Section 3.3.

*Administration Fee* 3.7 The SUBDIVIDER agrees to pay to the CITY'S Director of Engineering Services, an administration fee of a percentage amount of the value of the cost of the public services, as determined by the CITY'S Director of Engineering Services, for the approval of engineering drawings. The said percentage amount of the fee shall be as prescribed by Council from time to time. Fifty (50%) per cent of the fee is to be paid prior to the first submission of engineering drawings with the balance of the fee (50%) being paid prior to approval of the final set of engineering drawings.

*Contract/ Contractor Approval* 3.8 All servicing contracts between the SUBDIVIDER and any contractor for any work to be done pursuant to this Agreement shall be subject to the approval of the CITY'S Director of Engineering Services and without limiting the generality of the foregoing, every contract shall:

(a) be with a contractor acceptable to the CITY'S Director of Engineering Services;

(b) contain a provision binding the contractor to file performance and material and labour bonds and liability insurance satisfactory to the

CITY'S Director of Engineering Services, with in the case of liability insurance, the CITY named as an additional insured;

(c) provide that the work of the contractor shall at all times be subject to the inspection of the CITY or CITY'S consulting engineer and be performed in accordance with the terms of this Agreement;

(d) provide that the contractor shall co-operate with the inspectors and engineers at all times, submit materials used for any tests required and comply with any directions given by the inspectors and engineers, to ensure compliance with the plans and specifications;

(e) provide that the contractor shall supply a work schedule which may be updated as deemed necessary by the CITY, for the approval of the CITY'S Director of Engineering Services which work calendar shall provide for the work to be carried forward with reasonable expedition and which work calendar shall be adhered to so far as is reasonably possible;

(f) include an acknowledgment by the contractor that the contractor looks only to the SUBDIVIDER and not to the CITY for payment of this work.

*Staging/  
Phasing*

3.9 Staging and phasing shall be established to the satisfaction of the CITY'S Directors of Planning and Engineering Services. Any necessary facilities such as temporary roads, temporary emergency accesses, and temporary turning circles shall be shown on all engineering drawings for lands subject to this agreement, to the satisfaction of the CITY'S Director of Engineering Services in consultation with the Director of Transportation Services.

*Servicing  
Prior to  
Registration*

3.11 If the SUBDIVIDER wishes to proceed with the installation of services set out in Section 1.5 prior to registration of the Subdivision Plan, in addition to any other requirements set out in Part 3, the following shall also be required:

- (i) Final approval of any implementing zoning by-law;
- (ii) Approval of any required Detailed Vegetation Plans as set out in Section 2.10;
- (iii) Approval from the CITY'S Director of Planning of the draft subdivision plan showing the final Lotting for registration of those

lands being serviced. Such plan shall be submitted by the SUBDIVIDER and prepared in accordance with the plan modification required before registration and the approved Engineering drawings; and

- iv) Written authorization from the CITY'S Director of Engineering Services following the completion of clauses i), ii) and iii) above.

*Servicing Risk*      3.12      If the SUBDIVIDER receives authority to proceed under Section 3.11 it acknowledges and agrees that such servicing is done at its sole risk and the SUBDIVIDER agrees to indemnify the CITY with respect to any claim or loss which may occur as a result of the registration of a Plan of Subdivision other than that approved in clause 3.11 iii). The cost of rectifying any works carried out under Section 3.11 will be at the sole responsibility of the SUBDIVIDER.

*Decorative Street Signage and Lighting*      3.13      The SUBDIVIDER shall confirm whether decorative street signage and street lighting will be used for the subdivision to the satisfaction of the CITY'S Director of Transportation Planning and KW Hydro. Should these decorative elements be utilized, they shall be installed at the appropriate time frame and to the SUBDIVIDER'S cost, including the provision of 10% of the materials for future replacement/maintenance, to the satisfaction of the CITY'S Director of Transportation Planning, Kitchener Utilities, Director of Planning and KW Hydro.

## **PART 4      PRIOR TO APPLICATION OF ANY BUILDING PERMITS IN EACH STAGE**

*Lot Grading and Drainage Plan*      4.5      The SUBDIVIDER agrees:

- a) that a Lot Grading and Drainage Plan which shows foundation elevations and the location of the proposed building, street furniture, all municipal services and any other submission requirements shall be submitted to the CITY'S Chief Building Official with every application for a building permit. The site grading plan shall also show the elevation of the top of the foundation wall(s) of the proposed building, in conformance with the approved Lot Grading Control Plan;
- b) verification from the CITY'S consulting engineer shall be provided

that the site plan will comply with the approved Lot Grading Control Plan and Driveway Location Plan; and

*Temporary  
Access  
Roads*

- 4.12 The SUBDIVIDER agrees:
- a) to construct any required temporary access or temporary emergency access roads in the locations shown on the subdivision plan for the Stage or Phase to the satisfaction of the CITY'S Director of Engineering Services in consultation with the Director of Transportation Services at the cost of the SUBDIVIDER. The SUBDIVIDER hereby grants irrevocable licences to the CITY for access purposes on the lands on which such roads will be located, which the CITY will release when such roads are no longer required as determined by the CITY'S Director of Engineering Services; and
  - b) that the temporary access or temporary emergency access roads shall remain in place until a second permanent access to the lands being serviced by such temporary access or emergency access is available. No building permits shall be issued for any Lots or Blocks subject to the foregoing licences until the temporary access or emergency access roads on such Lot or individual parcel of land are no longer required, as determined by the CITY'S Director of Engineering Services, and are removed by the SUBDIVIDER to the satisfaction of the CITY'S Director of Engineering Services.

## **PART 6**

### **OTHER TIME FRAMES**

*Monu-  
mentation  
Certification*

- 6.3 The SUBDIVIDER will cause all necessary survey work to be done and all necessary survey stakes to be provided at its expense as and when required by the CITY'S Director of Engineering Services. Any standard iron bars, concrete monuments or monumentation of higher standards which are disturbed in the course of servicing or building shall be restored by and at the expense of the SUBDIVIDER. A certificate from an Ontario Land Surveyor or other evidence satisfactory to the CITY Solicitor shall be provided on a street by street basis, prior to the release of performance securities for this item to the SUBDIVIDER.

*Surveyor's  
Certificate*

- 6.4 The SUBDIVIDER shall submit to the CITY'S Chief Building Official a Surveyor's Certificate (Foundation Certificate) prepared by an Ontario Land Surveyor or professional engineer or certified engineering

technologist confirming that the elevation of the top of the constructed foundation wall(s), conforms, plus or minus six (6) inches, to the elevation shown on the site plan. The SUBDIVIDER agrees that no further construction of the building beyond the foundation will proceed until the Surveyor's Certificate has been received by the CITY'S Chief Building Official.

## Other Engineering Conditions:

1. All public right-of-ways and all services shall be designed and constructed to the standards specified in the City of Kitchener Standards, Development Manual, Regional Standards and other applicable Provincial Standards to the satisfaction of the Director of Engineering.
2. Detailed Geotechnical/Hydrogeological Investigation Report must be submitted to the City for review. This report must distinguish the suitability of soils to support the infiltration of roof water.
3. A detailed water servicing report is required to review the extent of lands that can be serviced by municipal water distribution network. A copy of this report should be directed to Engineering, Region of Waterloo and Utilities Division for approval.
4. Prior to Servicing or Registration which ever shall occur first, The SUBDIVIDER agrees to retain a qualified Engineering Consultant who shall prepare a detailed engineering design and report for the storm water management in accordance with the Strasburg Creek Master Watershed Plan, Huron Road Construction EIS Implementation Report: Stormwater Management and the City of Kitchener Integrated Stormwater Management Master Plan (ISWM-MP) volume retention policy (the most stringent policy will apply) to the satisfaction of the City's Director of Engineering Services in consultation with the Director of Operations, the Region of Waterloo and the Grand River Conservation Authority. The approved engineering design for Storm Water Management will include a maintenance program for a period of 2 years post 95% build out of the subdivision, which will ensure stormwater management facilities function as designed to the satisfaction of the CITY'S Director of Engineering. Any maintenance required during this period, prior to the municipality assuming the facilities, shall be at the sole expense of the SUBDIVIDER.
5. Prior to Servicing, the Subdivider agrees to retain a qualified Engineering Consultant who shall prepare a detailed engineering design to upgrade the storm water outlet under Strasburg Road to the existing SWM facility. The City's off-site works procedure is to be adhered to including posting of securities, signing agreements and the engineering consultant providing full-time inspection of works within City property. All off-site works are subject to a minimum two-year warranty period from the time of initial acceptance. The cost of outlet upgrade is at the sole expense of the Subdivider.
6. A detailed water balance is required to the satisfaction of the Director of Engineering.

7. Lot level infiltration galleries are required to the satisfaction of the Director of Engineering.
8. All SWM systems including infiltration requirements must meet City of Kitchener design standards and applicable Regional, GRCA and Provincial standards. A 15% oversizing of infiltration measures must be incorporated in the design.
9. Prior to Servicing, the subdivider agrees to provide a maintenance security that will form part of the Subdivider's Letter of Credit as the current City of Kitchener standards as this site will outlet into an existing stormwater management facility. The amount will be 100% of the Engineer's estimated cost to clean out the pond a total of two (2) times, proportionately reduced by a percentage which equals the contributing volume of the subject lands compared to the total contributing volume of the pond, to the satisfaction of the City's Director of Engineering Services.

Also, the subdivider will be required to add the estimated cost to flush the storm sewers up to the SWM facility one (1) time. This estimated cost will be based on the City's current sewer flushing rate per metre of pipe, to the satisfaction of the City's Director of Engineering Services.

10. Prior to Servicing, the Subdivider agrees to undertake a two (2)-year monitoring program of groundwater elevations to demonstrate the difference in elevation between the seasonally high groundwater table and the underside of footings to the satisfaction of the City's Director of Engineering Services.
11. Municipal authorization and alteration of the Environmental Compliance Approval (ECA) issued to the City of Kitchener from the MECP will be required for any alterations to the City of Kitchener Municipal Sewage Collection and/or Stormwater Management system (including addition, modification, replacement or extension).

#### Other Time Frames:

12. Prior to occupancy of each block, the Subdivider or subsequent owner agrees to construct at source infiltration galleries where soils permit, to the satisfaction of the City's Director of Engineering Services. Installation of infiltration galleries shall be supervised and certified by a qualified Geotechnical and or Engineering Consultant, at the Subdivider's or subsequent Owner's expense and to the satisfaction of the City's Director of Engineering Services through the Site Plan Approval Process.
13. Street A, B and C shall be constructed by the Subdivider to appropriate municipal standards and shall thereafter be dedicated to the City as public roads. In respect of these dedications, the Subdivider shall prepare and register any necessary reference plans and prepare all other documents required to complete the conveyances at the Subdivider's cost and expense. The dedications shall be free of all financial encumbrances to the satisfaction of the City's Solicitor.

# ***Internal memo***

*Development Services Department*



[www.kitchener.ca](http://www.kitchener.ca)

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A handwritten signature in blue ink, appearing to read "Eric Riek".

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Eric Riek, C.E.T.  
Project Manager, Development Engineering

S:\General\03-03-544 Subdivision Files\30Ts - 58M\30T-23201 Strasburg Industrial Lands\Correspondence\30T-23201 Revised Draft Plan Conditions-Engineering.doc

## Andrew Pinnell

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**From:** Cheng Lin <cheng.lin@enovapower.com>  
**Sent:** Wednesday, October 1, 2025 9:06 AM  
**To:** Andrew Pinnell  
**Cc:** Greig Cameron  
**Subject:** Re: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

You don't often get email from cheng.lin@enovapower.com. [Learn why this is important](#)

Hi Andrew,

This is to confirm the following statements are correct.

Please feel free to let me know if you have any more questions.

Kind regards,

**Cheng Lin, P.Eng, MBA** | Director of Engineering

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### Enova Power Corp

301 Victoria Street, Kitchener, ON N2G 4L2

Office: 226-896-2200 EXT 6197

Cell: 226-750-4211

[Cheng.Lin@enovapower.com](mailto:Cheng.Lin@enovapower.com) | [www.enovapower.com](http://www.enovapower.com)

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**From:** Andrew Pinnell <Andrew.Pinnell@kitchener.ca>  
**Sent:** Tuesday, September 30, 2025 5:19 PM  
**To:** Cheng Lin <cheng.lin@enovapower.com>  
**Cc:** Greig Cameron <greig.cameron@enovapower.com>  
**Subject:** FW: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Hi Cheng,

Are you able to assist in Shaun's absence? See below.

Thanks,

**Andrew Pinnell, MCIP, RPP**

Senior Planner | Development & Housing Approvals Division | City of Kitchener  
519-783-8915 | TTY 1-866-969-9994 | [andrew.pinnell@kitchener.ca](mailto:andrew.pinnell@kitchener.ca)



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**From:** Andrew Pinnell  
**Sent:** Tuesday, September 30, 2025 5:17 PM  
**To:** 'Shaun Wang' <shaun.wang@enovapower.com>  
**Cc:** 'Enova Power Corp. - Greig Cameron' <greig.cameron@enovapower.com>  
**Subject:** FW: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)  
**Importance:** High

Hi Shaun,

I'm just finalizing my report for this subdivision. I'll be including the following standard Enova comments (below). But note that I don't think I heard from Enova on this one (please forward me your comments if I'm incorrect).

Please confirm ASAP that the following standards conditions are sufficient to proceed with approval of this subdivision:

1. The SUBDIVIDER shall make satisfactory arrangements with Enova Power for the provision of permanent electrical services to the subdivision and/or the relocation of the existing services. Further, the SUBDIVIDER acknowledges that this may include the payment of all costs associated with the provision of temporary services and the removal of such services when permanent installations are possible.
2. The SUBDIVIDER shall make arrangements for the granting of any easements required for utilities and municipal services. The SUBDIVIDER agrees to comply with the following easement procedure:
  - a) to provide copies of the subdivision plan proposed for registration and reference plan(s) showing the easements to ENOVA, and telephone companies and the CITY, to the CITY'S Director of Planning.
  - b) to ensure that there are no conflicts between the desired locations for utility easements and those easement locations required by the CITY'S Director of Engineering Services for municipal services;
  - c) to ensure that there are no conflicts between utility or municipal service easement locations and any approved Tree Preservation/Enhancement Plan;
  - d) if utility easement locations are proposed within lands to be conveyed to, or presently owned by the CITY, the SUBDIVIDER shall obtain prior written approval from the CITY'S Director of Development and Housing Approvals and CITY'S Director of Engineering Services or, in the case of parkland, the CITY'S Director of Parks and Cemeteries; and
  - e) to provide to the CITY'S Director of Development and Housing Approvals, a clearance letter from each of ENOVA and telephone companies. Such letter shall state that the respective utility company has received all required grants of easement, or alternatively, no easements are required.

Thanks and I look forward to hearing from you at your earliest convenience.

**Andrew Pinnell, MCIP, RPP**

Senior Planner | Development & Housing Approvals Division | City of Kitchener  
519-783-8915 | TTY 1-866-969-9994 | [andrew.pinnell@kitchener.ca](mailto:andrew.pinnell@kitchener.ca)



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**From:** Christine Kompter <Christine.Kompter@kitchener.ca>

**Sent:** Friday, February 17, 2023 3:40 PM

**To:** \_DL\_#\_DSD\_Planning <DSD-PlanningDivision@kitchener.ca>; Bell - c/o WSP <circulations@wsp.com>; Carlos Reyes <Carlos.Reyes@kitchener.ca>; Darren Kropf <Darren.Kropf@kitchener.ca>; Dave Seller <Dave.Seller@kitchener.ca>; David Paetz <David.Paetz@kitchener.ca>; Ellen Straus <Ellen.Straus@kitchener.ca>; Enova Power Corp. - Greig Cameron <greig.cameron@enovapower.com>; Enova Power Corp. - Shaun Wang <shaun.wang@enovapower.com>; Feds <vped@feds.ca>; GRCA - Planning (planning@grandriver.ca) <planning@grandriver.ca>; Greg Reitzel <Greg.Reitzel@kitchener.ca>; Hydro One - Dennis DeRango <landuseplanning@hydroone.com>; Jim Edmondson

<Jim.Edmondson@kitchener.ca>; Justin Readman <Justin.Readman@kitchener.ca>; Katherine Hughes <Katherine.Hughes@kitchener.ca>; Mike Seiling <Mike.Seiling@kitchener.ca>; Ontario Power Generation <Executivevp.lawanddevelopment@opg.com>; Park Planning (SM) <Park.Planning@kitchener.ca>; Region - Planning <PlanningApplications@regionofwaterloo.ca>; Property Data Administrator (SM) <PropDataAdmin@kitchener.ca>; Robert Morgan <Robert.Morgan@kitchener.ca>; Steven Ryder <Steven.Ryder@kitchener.ca>; Sylvie Eastman <Sylvie.Eastman@kitchener.ca>; WCDSB - Planning <planning@wcdsb.ca>; WRDSB - Board Secretary (elaine\_burns@wrdsb.ca) <elaine\_burns@wrdsb.ca>; WRDSB - Planning <planning@wrdsb.ca>

**Cc:** Andrew Pinnell <Andrew.Pinnell@kitchener.ca>

**Subject:** Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Please see attached. Additional documentation can be found in AMANDA folder 23-102603 and [ShareFile](#) (external agencies). Comments or questions should be directed to **Andrew Pinnell**, Senior Planner ([Andrew.pinnell@kitchener.ca](mailto:Andrew.pinnell@kitchener.ca); 519-741-2200 x7668).

### Christine Kompter

Administrative Assistant | Planning Division | City of Kitchener

200 King Street West, 6<sup>th</sup> Floor | P.O. Box 1118 | Kitchener ON N2G 4G7

519-741-2200 ext. 7425 | TTY 1-866-969-9994 | [christine.kompter@kitchener.ca](mailto:christine.kompter@kitchener.ca)



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*<https://enovapower.com/disclaimer>*



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](http://www.grandriver.ca)

April 28, 2025

Andrew Pinnell  
Senior Planner  
City of Kitchener  
200 King Street West  
Kitchener ON N2G 4V6  
[andrew.pinnell@kitchener.ca](mailto:andrew.pinnell@kitchener.ca)

**Re: Draft Plan of Subdivision 30T-23201  
1700-1760 Strasburg Road, Kitchener  
2140221 Ontario Inc.**

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Dear Andrew Pinnell,

Grand River Conservation Authority (GRCA) staff have reviewed the re-submission for the above-noted applications for an industrial subdivision.

**Recommendation**

The GRCA recommends conditional draft plan approval of this application.

## **Documents Reviewed by Staff**

Staff have reviewed the following documents submitted with this application:

- Urban Design Brief (GSP, June 2023)
- Environmental Impact Study (GHD, March 2025)
- Functional Servicing Stormwater Management Report (WalterFedy, April 2023)
- Site Water Balance Analysis (GHD, February 23, 2024)
- Draft Plan (GSP, dated September 14, 2022)

This follows our July 15, 2024 comments on the previous submission.

## **GRCA Comments**

Our previous concerns have now been addressed at this stage in the subdivision process. As a result, we are now in a position to recommend draft plan approval with the following conditions:

1. Prior to any grading or construction on the site and prior to registration of the plan, the owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority.
  - a. A detailed stormwater management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual".
  - b. A detailed Environmental Impact Study.
  - c. A detailed Lot Grading, Servicing and Storm Drainage Plan.
  - d. An Erosion and Siltation Control Plan in accordance with the Grand River Conservation Authority's Guidelines for sediment and erosion control, indicating the means whereby erosion will be minimized and silt maintained on-site throughout all phases of grading and construction.
  - e. The submission and approval of a permit under the Prohibited Activities, Exemptions and Permits Regulation from the GRCA prior to construction and/or grading in a regulated area and/or construction of the stormwater management outlet in a regulated area.

We trust that the municipality will ensure the Subdivider's Agreement between the owners and the municipality contain provisions for the completion and maintenance of the works in accordance with the approved plans and reports noted in Condition 1) above. Once the above has been met, we can issue GRCA's clearance of the subdivision to the municipality.

We wish to acknowledge receipt of the remaining fees for this subdivision (\$6,648.38). Additional fees will be required for draft plan clearance, and a separate fee will be required for a GRCA permit.

We trust this information is of assistance. If you have any questions or require additional information, please contact me at 519-621-2763 ext. 2292 or [theywood@grandriver.ca](mailto:theywood@grandriver.ca).

Sincerely,



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Trevor Heywood  
Resource Planner  
Grand River Conservation Authority

## Andrew Pinnell

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**From:** Deeksha Choudhry  
**Sent:** Friday, May 12, 2023 10:13 AM  
**To:** Andrew Pinnell; Jessica Vieira  
**Subject:** Re: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Hi Andrew,

Yes, we don't have any heritage comments or issues.

I thought I had replied, but looks like I hadn't, apologies!

Kind Regards,

Deeksha Choudhry, **MSc, BES**  
Heritage Planner | Planning Division | City of Kitchener  
519-741-2200 ext. 7291 | TTY 1-866-969-9994  
deeksha.choudhry@kitchener.ca



Residents are encouraged to visit [kitchener.ca/covid19](https://kitchener.ca/covid19) for the most up-to-date information about City services.



**PERMIT UNDER subsection 17(1) in accordance with the criteria in  
clause 17(2)(c) of the ENDANGERED SPECIES ACT, 2007**

**Permit #: WC-C-006-23**

**Issued to:** 2140221 Ontario Incorporated  
270 Shoemaker Street  
Kitchener, Ontario  
N2E 3E1

**Term:** This permit comes into force on the date it is issued and expires after submission of a final report that meets the requirements of condition 35.

**Location:** PT LT 17 RCP 1471 Kitchener PTS 1 & 2, 58R6642, S/T 1004437; S/T 1487182 City of Kitchener  
and  
PT. LOT 1 RCP 1382, BEING PT. 8 ON 58R-12866, SAVE & EXCEPT PT. 1 ON 58R-15153 City of Kitchener  
in the area identified in Schedule B (the "**Site**").

**Project Description:** Construction of a 10-lot industrial subdivision, including grading and servicing, two (2) new roads, and an extension of McBrine Drive at the Site (the "**Project**").

- 1. Authority:** This permit is issued to 2140221 Ontario Incorporated (the "**Permit Holder**") under subsection 17(1) of the *Endangered Species Act, 2007* ("**ESA**") in accordance with the criteria in clause 17(2)(c) of that Act.
- 2. Application to Species:** This permit applies to Blanding's Turtles, which is a species listed as threatened in Ontario Regulation 230/08 "Species at Risk in Ontario List" (the "**SARO List**"), and its habitat.
- 3. Authorization:** This permit authorizes the Permit Holder to engage in the following activities at the Site that would otherwise be prohibited by subsections 9(1) and 10(1) of the ESA, for the purpose of carrying out the Project or fulfilling conditions of this permit:

- (a) harming, harassing, capturing, possessing, collecting, and transporting Blanding's Turtle;
  - (b) destroying up to 10.70 hectares of Category 3 Blanding's Turtle habitat; and
  - (c) damage up to 2.10 hectares of Category 3 Blanding's Turtle habitat.
4. **Conditions:** Pursuant to subsection 17(6) of the ESA, the authorizations in section 3 of this permit do not apply unless the Permit Holder complies with the requirements imposed by conditions in this permit.
5. **Compliance:** Section 36 of the ESA provides that non-compliance with the prohibitions in subsections 9(1) and 10(1) of that Act and any provision of this permit constitute offences.
6. **Schedules:** The following appendices form part of this permit:
- Schedule A: Conditions
  - Schedule B: Project Location and Impacts (the Site)
  - Schedule C: Mitigation Measures at the Site
  - Schedule D: Overall Benefit Activities at the Site

Pursuant to subsection 17(1) of the ESA and in accordance with the criteria in clause 17(2)(c) of the ESA, I hereby issue this permit authorizing the activities described above, subject to the conditions set out herein.



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Andrea Khanjin

Minister of the Environment, Conservation and  
Parks

Date of Issuance: 28/01/25  
(dd/mm/yy)

**From:** [Stewart, Catherine \(MECP\)](#)  
**To:** [Katherine Ryan](#)  
**Cc:** [Laura Lawlor](#)  
**Subject:** RE: Meeting Request RE Strasburg Road IGF  
**Date:** Tuesday, August 30, 2022 11:42:54 AM  
**Attachments:** [2022-06\\_Bat\\_Survey\\_Standards\\_MECP.pdf](#)  
[2021\\_Bats & Buildings\\_Exit & Roost Surveys\\_MECP.pdf](#)  
[2022-06\\_Bats & Treed Habitats\\_MaternityRoostSurveys\\_MECP.pdf](#)

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Hi Katherine,

Your proponent is now the landowner – great news for this project moving forward! I have vacation and other commitments that make the next available day I can call you likely next Wednesday, if still needed just let me know.

For Blanding's Turtle, the ministry's position remains that the property contains general habitat protected under the ESA 2007, and so, the proposed development will need to seek authorization (i.e. overall benefit C permit) under the Act prior to site alteration. Please submit a revised IGF and Avoidance Alternatives Form to [SAROntario@ontario.ca](mailto:SAROntario@ontario.ca) to begin the permit process.

For Tri-coloured Bat, the ministry accepts the conclusion in the IGF that the 1 potential tree has low likelihood of being used by the species, and so, no further authorization under the ESA 2007 is needed for this species. However, removal of this tree should be done outside the active season for Tri-coloured Bat (i.e. outside April 1 – September 30). Also, please see the attached updated SAR bat guidance documents, which GHD should use for applicable files moving forward.

Regards,

**Catherine Stewart**  
Management Biologist  
Permissions Section, Species at Risk Branch  
Ministry of the Environment, Conservation and Parks

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**From:** Katherine Ryan <Katherine.Ryan@ghd.com>  
**Sent:** August 30, 2022 9:00 AM  
**To:** Stewart, Catherine (MECP) <Catherine.A.Stewart@ontario.ca>  
**Cc:** Laura Lawlor <Laura.Lawlor@ghd.com>  
**Subject:** RE: Meeting Request RE Strasburg Road IGF

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hi Catherine,

Just following up on the email below. The coordination of a meeting is very timely for this project could you please call me at 289 795-5422.

Thank you,

**City of Kitchener**  
**Draft Plan of Subdivision Comment Form**

**Address:** McBrine Drive and 1700 Strasburg Road  
**Owner:** 2140221 Ontario Inc  
**Application:** Draft Plan of Subdivision 30T-23201

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Comments Of: Parks and Cemeteries  
Commenter's Name: Lenore Ross  
Email: Lenore.ross@kitchener.ca  
Phone: 519-741-2200 ext 7427

Date of Comments: August 2023

- I plan to attend the meeting (questions/concerns/comments for discussion)  
 No meeting to be held  
 I do NOT plan to attend the meeting (no concerns)
- 

**1. Documents Reviewed:**

I have reviewed the documentation noted below submitted in support of a business park subdivision containing 10 industrial lots, ranging in size from 0.67 to 3.01 hectares. McBrine Drive would be extended to connect with a new street ("Street A"). Street A would outlet to Strasburg Road. McBrine Drive would terminate at a new cul-de-sac bulb. Another cul-de-sac is proposed off Street A. A 3.86 hectare open space / wetland block adjacent to Huron Natural Area (HNA) is proposed. A second open space / wildlife corridor would provide wildlife passage from the HNA to a nearby stormwater management pond. Official Plan and Zoning By-law Amendments are not proposed.

1. A revised Functional Servicing and Stormwater Management Report - WalterFedy, dated April 18, 2023;
2. A letter prepared by WalterFedy, dated April 18, 2023, to the GRCA (Chris Foster-Pengelly) in response to the GRCA comments of March 13, 2023;
3. A letter from GHD in response to GRCA comments on the Scoped Environmental Impact Study, dated June 28, 2023 that includes a Feature-Based Water Balance Analysis
4. Revised Urban Design Report - GSP Group dated June 2023;
5. A Response Matrix to the Post-Circulation Comments - GSP Group dated July 2023

**2. Site Specific Comments & Issues:**

Parks and Cemeteries has no significant concerns with the proposed Draft Plan of Subdivision and can provide conditional support subject to the minor updates to submitted studies are noted below.

**PRELIMINARY SUBDIVISION CONDITIONS**

These preliminary comments will also include all Standard Conditions of Subdivision in their entirety, latest version, including the Condition requiring that the developer meet the latest revision of the Development Manual which is updated from time to time. All requirements noted below will be included as part of the subdivision agreement and at the cost of the developer.

**City of Kitchener**  
**Draft Plan of Subdivision Comment Form**

- .1 Grading Plan
- .2 Coordinated Utilities Plan
- .3 General Vegetation Overview/Detailed Vegetation Plan
- .4 Landscape Plans
  - a. Street Tree Planting Plan showing street trees along all proposed streets according to the relevant section of the latest Development Manual and Urban Forest Guidelines. All specified trees should be native species. Street tree plantings to be confirmed at Site Plan Application and any required compensation for deficiencies provided as CIL prior to final acceptance.
  - b. Open Space, SAR habitat creation / compensation, wetland Replacement/Restoration Plans, Wildlife Corridor Planting Plans as identified through the EIS. Plans to include plantings, temporary and permanent fencing including wildlife fencing at limits of development lots 1, 2, 3, 8, 9 and 10 as well as for the reconstructed wetland . Signage should be included
  - c. Trail Block Plans – trail design and landscape plantings
  - d. Construction of new/replacement habitat should occur and be functional prior to removal of existing habitat
  - e. Species relocation strategy
  - f. Signage for multi use trails and connections
- .5 Conveyance of Open Space, Natural Heritage Conservation and Trail blocks to the City
- .6 Construction / installation of required trails, multiuse pathways, street trees, Wetland replacement plantings, fencing, signage.
- .7 Management strategy and monitoring of invasive species for a period of 5 years from initial acceptance and SAR monitoring for a period of time as determined through EIS recommendations
- .8 Securities for all required works
- .9 **Parkland Dedication will be deferred at the Draft Plan of Subdivision application and taken as cash in lieu of land at each of the required site plan applications.** Dedication requirements are subject to the Parkland Dedication Bylaw and Policy current at the time of a formal Site Plan application.

**3. Comments on Submitted Documents**

The following comments should be addressed at this time .

**1) Urban Design Brief**

- a) Several site diagrams do not reflect the MUT and sidewalk locations as communicated by Transportation Services and Parks & Cemeteries e.g. pg 16 Concept Plan and pg 18 Priority Lotting.
- b) Pg 21 - “The intersection of Street ‘A’ and Strasburg Road will have entry features using local materials and complementary landscape features such as double row of planting beds and ornamental planting.” This should be clarified to indicate that all entry features will be located on the development blocks not within the public right of way.

**City of Kitchener**  
**Draft Plan of Subdivision Comment Form**

- c) Pg 22 – “Sidewalks will be provided at least on one side of the public streets” This should be revised to indicate that sidewalks will be provided according to Development Manual and Complete Streets standards.”
- d) Pg 22 #4 Landscape along Created Wetland/Stormwater Management Facility – GRCA has noted that “the proposed constructed wetland will be regulated by the GRCA. The GRCA does not support the creation of trails/walkways and seating areas within the wetland or wetland buffer.” The reference to walkways and seating should be clarified to indicate these new features will be outside of regulated areas.

**A revised Urban Design Brief is required.**

**4. Policies, Standards and Resources:**

- Kitchener Official Plan
- City of Kitchener Park Dedication Bylaw 2022-101 and Park Dedication Policy
- City of Kitchener Development Manual
- Cycling and Trails Master Plan (2020)
- Chapter 690 of the current Property Maintenance By-law
- Places & Spaces: An Open Space Strategy for Kitchener
- Multi-Use Pathways & Trails Masterplan
- Urban Design Manual

**5. Anticipated Fees:**

The Parkland dedication requirement **will be deferred** at the Draft Plan of Subdivision and assessed at future Site Plan Applications. Parkland dedication will be assessed based on the land use class(es) and required as a condition of Site Plan Approval as cash in lieu.

Dedication requirements are subject to the Parkland Dedication Bylaw, Policy and rates in effect. Please be advised that an updated Parkland Dedication Policy and By-law were approved by City of Kitchener Council on August 22 2022. This update includes but is not limited to changes to the classes of lands requiring Parkland Dedication, standard land assessment values for determining Parkland Dedication, Parkland Dedication exemption categories and transition provisions for in-progress applications. The Bylaw is under appeal. Further changes to the Bylaw may be required as a result of the Bill 23 – More Homes Built Faster Act.



PLANNING, DEVELOPMENT AND  
LEGISLATIVE SERVICES  
150 Frederick Street, 8<sup>th</sup> floor  
Kitchener Ontario N2G 4J3 Canada  
Telephone: 519-575-4400  
Fax: 519-575-4449  
www.regionofwaterloo.ca

Shilling Yip (226) 753-1064 (c)  
File: D18-20/23201

June 4, 2025

Andrew Pinnell, MCIP. RPP  
Senior Planner  
DSD – Planning Division  
City of Kitchener  
200 King Street W.  
Kitchener, ON N2G 4G7

Dear Mr. Pinnell:

**Post Re-circulation (2025) Comments  
Plan of Subdivision 30T-23201  
McBrine Drive & 1700 Strasburg Road  
CITY OF KITCHENER**

Regional staff has reviewed the above-noted re-circulation and provides the following comments for your consideration at this time. Comments were previously provided on March 28, 2023, September 19, 2023 and November 1, 2024. This latest re-circulation deals with an updated Scoped EIS, and related environmental matters. As these environmental matters are now the responsibility of the City of Kitchener, Regional staff has no further comments in this regard. The purpose of these comments is to identify the items pertaining to the Region's responsibilities that can be imposed as conditions of approval.

The draft plan (GSP, September 14, 2022) proposes 10 industrial lots ranging from 0.67ha to 1.22ha (1.65ac to 3.01ac) in size, an open space block, and an open space/wildlife corridor block, on full municipal services.

The lands are designated Urban Area, Delineated Built-Up Area and Core Environmental Feature on Maps 1, 2 and 6, respectively in the Regional Official Plan, and further designated Business Park Employment in the City's Official Plan.

The lands are zoned EMP-4 Service Business Park Employment in the City Zoning Bylaw 2019-051 which permits a broad range of industrial business park uses. Official Plan and Zoning By-law amendments are not proposed.

### Region Planning Fees

It has come to staff's attention that the applicant's cheque for the original subdivision application fee (\$14,150.00, Cheque #841 dated November 10, 2022) had become stale-dated before staff was able to deposit. As such, this cheque needs to be replaced. In addition, the Region's comments of September 19, 2023 indicated the Region's re-circulation fee applies (\$1,150.00). To staff's knowledge this fee remains outstanding. By copy of this letter, the applicant is asked to submit these fees to the Region (total \$15,300.00).

Subject to the above-noted comments, the Region's comments of March 28, 2023, September 19, 2023 and November 1, 2024 continue to apply.

### **Draft Plan of Subdivision Conditions**

The Region has **no objections** to draft approval of Plan of Subdivision 30T-23201, subject to receipt of the Regional planning review fees (total \$15,500.00), and the inclusion of the following conditions of draft approval set out below:

- 1) That this approval applies to Plan of Subdivision 30T-23201 for 2140221 Ontario Inc. in the City of Kitchener, Dwg File Name: dp18161f.dwg by GSP Group dated September 14, 2022 which shows the following:

Lots 1 to 10	Industrial
Block 11	Open Space
Block 12	Open Space / Wildlife Corridor

- 2) That prior to final approval, the Subdivider agrees to stage the development of this plan of subdivision in a manner satisfactory to the City of Waterloo and the Regional Municipality of Waterloo.
- 3) That prior to final approval, Streets A, B and C be named to the satisfaction of the City of Kitchener and the Regional Municipality of Waterloo.
- 4) That prior to final approval, the subdivision agreement be registered by the City of Kitchener against the land to which it applies and a copy of the registered agreement be forwarded to the Regional Municipality of Waterloo prior to final approval of the subdivision plan.
- 5) That prior to final approval, the Subdivider submit detailed engineering drawings which show the removal and proper disconnection of the existing 300mm water service stub that was previously installed near the stormwater sewer outlet to service this property, to the satisfaction of the Regional Municipality of Waterloo.

6) That prior to final approval, the Subdivider complete a detailed stormwater management report to the satisfaction of the Regional Municipality of Waterloo. The report must include:

- an assessment of whether the soils and the noted high water table can accommodate the infiltration volumes being proposed; and
- the oversizing of infiltration galleries by 15% to account for decreased performance and/or disconnection.

Furthermore, the Subdivider enter into a registered development agreement with the Regional Municipality of Waterloo to indicate that any future grading and drainage plan/SWM report submitted for site plan approval for Lots 1 to 10, all inclusive be in accordance with the approved Stormwater Management Plan for this subdivision, to the satisfaction of the Regional Municipality of Waterloo.

7) That prior to final approval, the Subdivider enter into a registered development agreement with the Regional Municipality of the Waterloo to require the completion prior to Site Plan approval, implement a Salt Management Plan for Lots 1 to 10, all inclusive, to the satisfaction of the Regional Municipality of Waterloo.

8) That prior to final approval, the Subdivider enter into a registered development agreement with the Regional Municipality of Waterloo to prohibit the installation of vertical open-loop and vertical closed-loop geothermal energy systems for Lots 1 to 10, all inclusive, to the satisfaction of the Regional Municipality of Waterloo.

9) That prior to final approval, the Subdivider enter into a registered development agreement with the Regional Municipality of Waterloo to prohibit Category A Land Uses (as described in Schedule B of the Regional Official Plan) for Lots 1 to 10, all inclusive, to the satisfaction of the Regional Municipality of Waterloo.

10) That prior to final approval, the Subdivider provide the Region sufficient funds for the future installation of two (2) 9.5m x 2m transit landing pads by the Region, to the satisfaction of the Regional Municipality of Waterloo. The cost of the landing pads to be determined based on the cost of construction at time of payment.

## **General Comments**

Any future development on the lands subject to the above-noted applications will be subject to the provisions of Regional Development Charges By-law 19-037 or any successor thereof.

Please accept this letter as out request for a copy of the decision pertaining to this application. Should you have any questions, please do not hesitate to contact me.

Yours truly,

Shilling Yip, MCIP, RPP  
Senior Planner

cc. Brandon Flewwelling, GSP Group (via email)

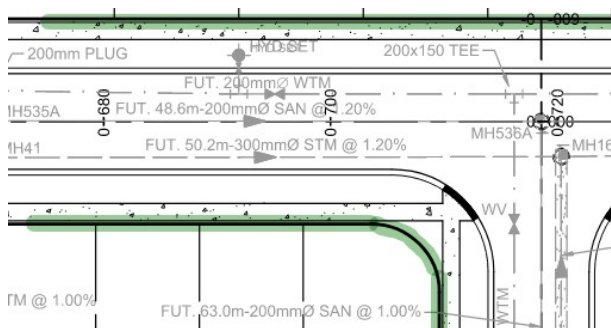
## Andrew Pinnell

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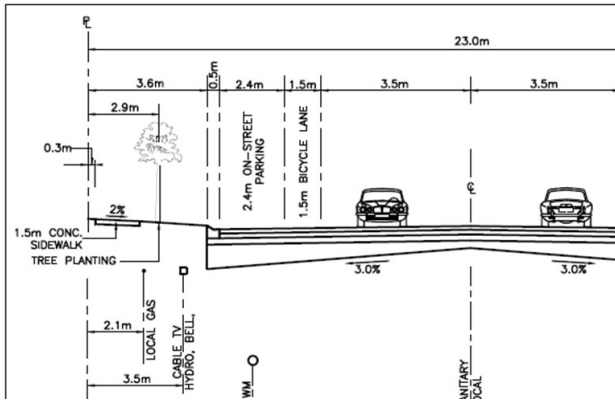
**From:** Dave Seller  
**Sent:** Friday, March 22, 2024 10:09 AM  
**To:** Eric Riek  
**Subject:** TS comments: 30T-23201, 1st Submission, (McBrine Drive & 1700 Strasburg Road Kitchener)  
**Attachments:** 2020 COK MUT standards.pdf

### General Comments

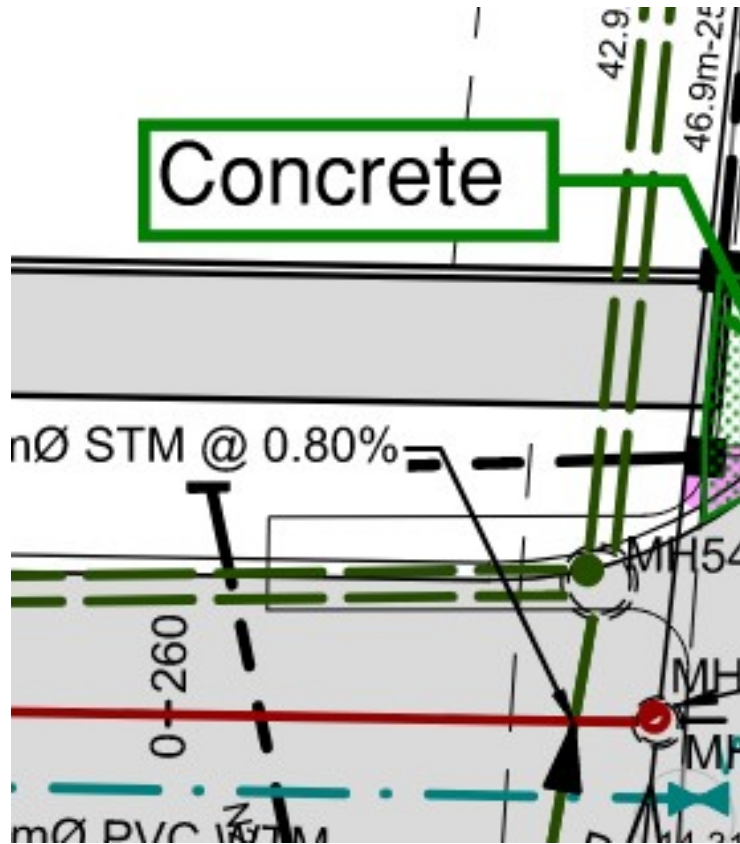
1. Multi-use Trail Sign and Pavement Marking Standards (attached) and OTM Book 18 be used in combination for submission.
2. Cycling/pedestrian signs and pavement markings to follow OTM Book 18 – Cycling Facilities June 2021. [OTM Book 18](#)
  - See page 157 of 387 (combined crossside to be in accordance with Figure 6.3)
  - See page 184 of 387 (Adjacent Crossing Intersection Approach with Multi-use Paths be in accordance with Figure 6.4)
3. A 0.30m offset be provided between back of sidewalk/MUT to property line.
4. Stop bars be increased to 0.60m.
5. Stop bars be offset a minimum 1.5m from back of sidewalk/MUT.
6. Vehicle travel - solid yellow centre lines at stop locations be a minimum of 15m in length.
7. Solid yellow center line width – 0.10m.
8. LED streetlighting is required.
9. Property lines must be identified more clearly on the plan and profile drawings. For example, see green highlights below, a solid black line was used.



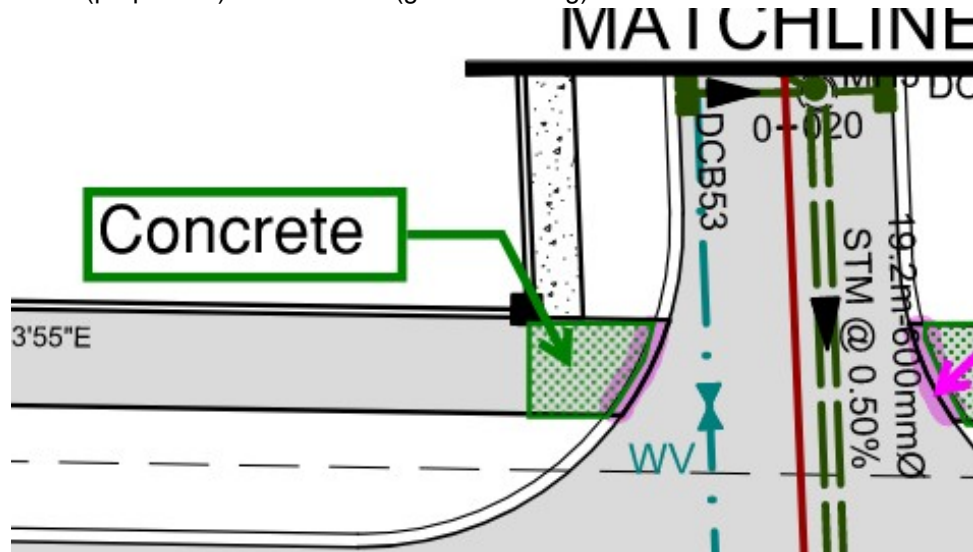
10. Below is an example of a right-of-way cross section that must be provided for each street.



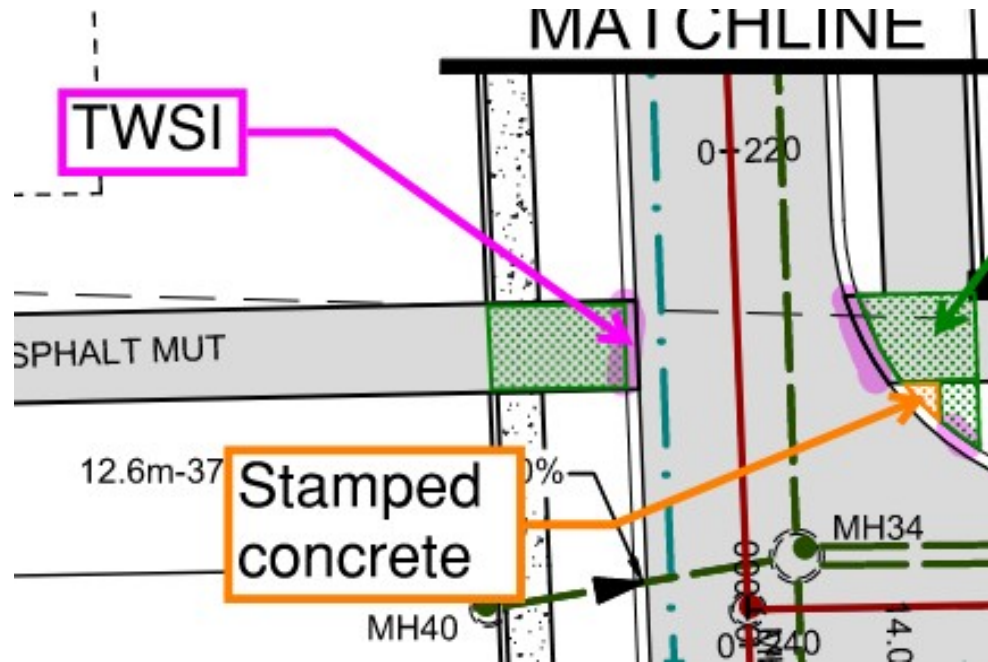
Drawing number	Comments
<p>C4-1 Plan &amp; Profile</p> <p>Street A</p>	<ul style="list-style-type: none"> <li>See below - existing MUT along Strasburg Road. Dimensioning of MUT at Street A must be noted on the plan.</li> </ul>  <ul style="list-style-type: none"> <li>Street A is a Major Collector roadway and based on the city's Geometric Standards for vertical curves, a K value of 20 be provided for a sag curve, rather than the K value of 12 noted on the plan. (LVC 65.77)</li> <li>Street A is a Major Collector roadway and based on the city's Geometric Standards for vertical curves, a K value of 15 be provided for a crest curve, rather than the K value of 12 noted on the plan. (LVC 41.74)</li> <li>Street A is a Major Collector roadway and should have a maximum 1.5% grade for a stop road at Strasburg Road. The distance should be measured 20 metres back from the pedestrian cross walk.</li> <li>Fully separated drop curbs/Tactile Walking Surface Indicator (TWSI) be provided at intersections and noted on the plan.</li> <li>TWSI (purple line) and concrete (green hatching) be installed for existing MUT along Strasburg Road. See below.</li> </ul>



- TWSI (purple line) and concrete (green hatching) be installed at Street B. See below.



- TWSI (purple line), concrete (green hatching) and stamped concrete (brown hatching) be installed. See below.

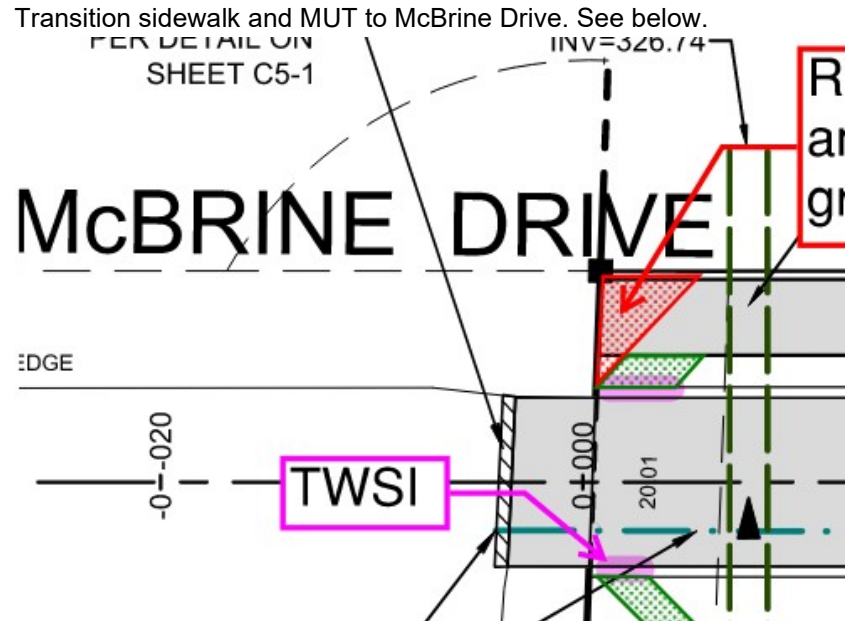


C4-2 Plan & Profile  
Street B

- Street B is a Minor Collector roadway and based on the city's Geometric Standards for vertical curves, a K value of 20 be provided for a sag curve, rather than the K value of 12 noted on the plan. (LVC 40.00)
- Street A is a Minor Collector roadway and based on the city's Geometric Standards for vertical curves, a K value of 15 be provided for a crest curve, rather than the K value of 8 noted on the plan. (LVC 33.20)
- Street B is a Minor Collector roadway and should have a maximum 1.5% grade for a stop road at Street A. The distance should be measured 20 metres back from the MUT.
- Fully separated drop curbs/Tactile Walking Surface Indicator (TWSI) be provided at intersections and noted on the plan.

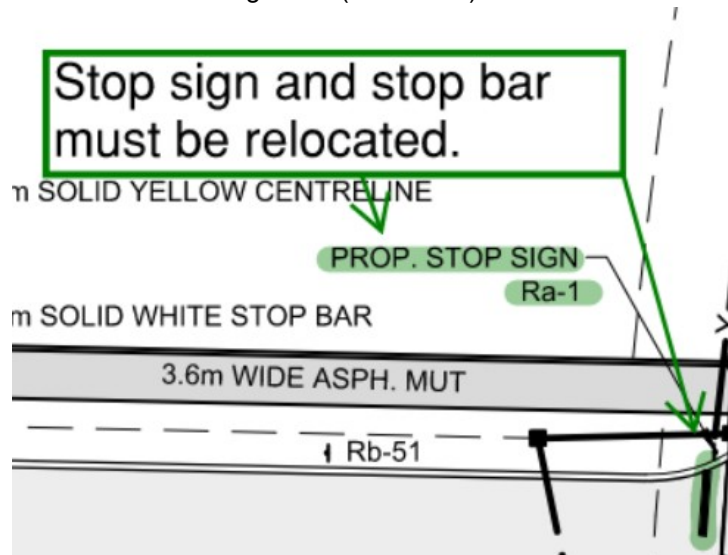
C4-3 Plan & Profile  
Street C

- Street C is a Minor Collector roadway and based on the city's Geometric Standards for vertical curves, a K value of 20 be provided for a sag curve, rather than the K value of 12 noted on the plan. (LVC 26.24)
- Fully separated drop curbs/Tactile Walking Surface Indicator (TWSI) be provided at intersections and noted on the plan.
- Transition sidewalk and MUT to McBrine Drive. See below.



Pavement Markings

- Street A at Strasburg Road (see below).

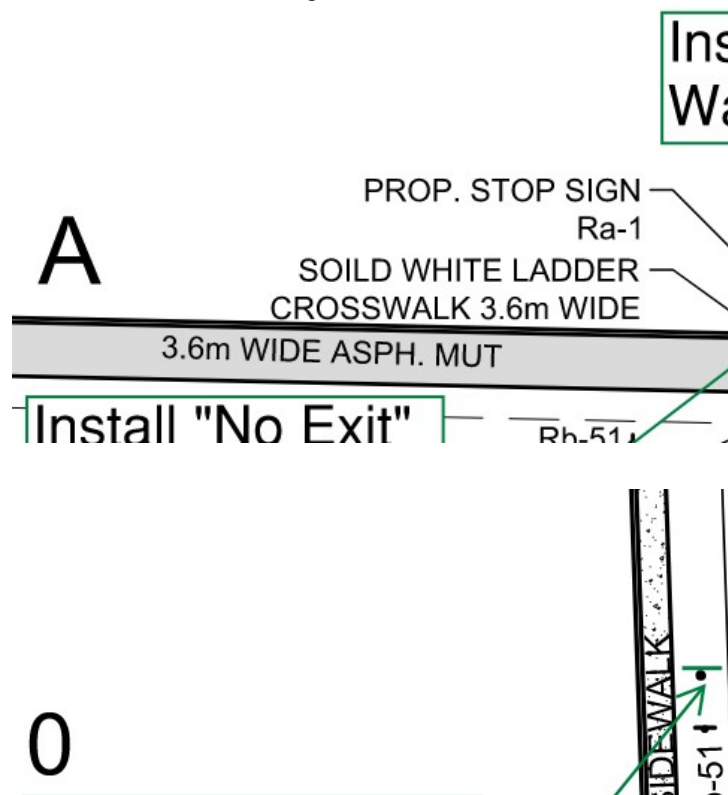


Signs

- All Rb-51's be removed from the plan.
- Install "No Exit" Wa-31 signs for Streets B & C. See below.

CB-1

Pavement Marking & Signage Plan



NO EXIT Sign



Wa-31

45 cm x 45 cm

**Dave Seller, C.E.T.**

Traffic Planning Analyst | Transportation Services | City of Kitchener  
519-741-2200 ext. 7369 | TTY 1-866-969-9994 | [dave.seller@kitchener.ca](mailto:dave.seller@kitchener.ca)

# City of Kitchener Comment Form

**Project Address:** McBrine/Strasburg Road – Industrial Subdivision

**Application Type:** Draft Plan of Subdivision

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Comments Of: Urban Design

Commenter's Name: Katey Crawford

Email: [Katey.Crawford@kitchener.ca](mailto:Katey.Crawford@kitchener.ca)

Phone: 519-741-2200 ext. 7157

Date of Comments: March 13th, 2024

- I plan to attend the meeting (questions/concerns/comments for discussion)
  - No meeting to be held
  - I do NOT plan to attend the meeting (no concerns)
- 

## 1. Documents Reviewed

- Urban Design Brief, prepared by GSP Group – dated October 2023

## 2. Site Specific Comments & Issues:

### **Urban Design Brief**

- Page 15. Update plan as per comments on page 18.
- Page 17. Update plan as per comments on page 18.
- Page 17. See mark-up provided with regards to terminating vista lots and revise.
- Page 18. See mark-up provided with regards to lots fronting Strasburg Road and revise.
- Page 18. Pavement marking and signage plans show additional sidewalk connection and MUT running up to Mcbrine Street. Coordinate and revise accordingly.
- Page 18. Sidewalk adjacent to Building F is shown within ROW on pavement marking and signage plans. Coordinate and revise accordingly.

Prior to draft approval the following is required:

- Updated Urban Design Brief

Urban Design conditions of draft approval:

The SUBDIVIDER agrees that the subdivision shall be developed in accordance with the endorsed Strasburg Technology Business Park Urban Design Brief and City of Kitchener Urban Design Guidelines for the huron trillium industrial employment area.

Prior to registration, pre-grading or pre-servicing as required, the SUBDIVIDER agrees to receive final approval of a Priority Lotting Plan and of Design Guidelines for Priority Lots to the satisfaction of the CITY'S Director of Planning.

Preliminary Comments

## Andrew Pinnell

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**From:** Planning <planning@wcdsb.ca>  
**Sent:** Thursday, March 9, 2023 4:43 PM  
**To:** Andrew Pinnell  
**Subject:** RE: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Good Afternoon Andrew,

The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comment(s)/condition(s):

A) That any Education Development Charges shall be collected prior to the issuance of a building permit(s).

If you require any further information, please contact me by e-mail at [Jordan.Neale@wcdsb.ca](mailto:Jordan.Neale@wcdsb.ca).

Thank you,

**Jordan Neale**

Planning Technician, WCDSB

480 Dutton Dr, Waterloo, ON N2L 4C6

519-578-3660 ext. 2355

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**From:** Christine Kompter <Christine.Kompter@kitchener.ca>  
**Sent:** Friday, February 17, 2023 3:40 PM  
**To:** \_DL\_#\_DSD\_Planning <DSD-PlanningDivision@kitchener.ca>; Bell - c/o WSP <circulations@wsp.com>; Carlos Reyes <Carlos.Reyes@kitchener.ca>; Darren Kropf <Darren.Kropf@kitchener.ca>; Dave Seller <Dave.Seller@kitchener.ca>; David Paetz <David.Paetz@kitchener.ca>; Ellen Straus <Ellen.Straus@kitchener.ca>; Enova Power Corp. - Greig Cameron <greig.cameron@enovapower.com>; Enova Power Corp. - Shaun Wang <shaun.wang@enovapower.com>; Feds <vped@feds.ca>; GRCA - Planning (planning@grandriver.ca) <planning@grandriver.ca>; Greg Reitzel <Greg.Reitzel@kitchener.ca>; Hydro One - Dennis DeRango <landuseplanning@hydroone.com>; Jim Edmondson <Jim.Edmondson@kitchener.ca>; Justin Readman <Justin.Readman@kitchener.ca>; Katherine Hughes <Katherine.Hughes@kitchener.ca>; Mike Seiling <Mike.Seiling@kitchener.ca>; Ontario Power Generation <Executivevp.lawanddevelopment@opg.com>; Park Planning (SM) <Park.Planning@kitchener.ca>; Region - Planning <PlanningApplications@regionofwaterloo.ca>; Property Data Administrator (SM) <PropDataAdmin@kitchener.ca>; Robert Morgan <Robert.Morgan@kitchener.ca>; Steven Ryder <Steven.Ryder@kitchener.ca>; Sylvie Eastman <Sylvie.Eastman@kitchener.ca>; Planning <planning@wcdsb.ca>; WRDSB - Board Secretary (elaine\_burns@wrdsb.ca) <elaine\_burns@wrdsb.ca>; WRDSB - Planning <planning@wrdsb.ca>  
**Cc:** Andrew Pinnell <Andrew.Pinnell@kitchener.ca>  
**Subject:** Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

**Caution** - External Email - This Message comes from an external organization. Do NOT click on unrecognized links or provide your username and/or password.

Please see attached. Additional documentation can be found in AMANDA folder 23-102603 and [ShareFile](#) (external agencies). Comments or questions should be directed to **Andrew Pinnell**, Senior Planner ([Andrew.pinnell@kitchener.ca](mailto:Andrew.pinnell@kitchener.ca); 519-741-2200 x7668).

**Christine Kompter**

Administrative Assistant | Planning Division | City of Kitchener  
200 King Street West, 6<sup>th</sup> Floor | P.O. Box 1118 | Kitchener ON N2G 4G7  
519-741-2200 ext. 7425 | TTY 1-866-969-9994 | [christine.kompter@kitchener.ca](mailto:christine.kompter@kitchener.ca)



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## Andrew Pinnell

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**From:** Brandon Coveney <planning@wrdsb.ca>  
**Sent:** Tuesday, March 14, 2023 10:47 AM  
**To:** Christine Kompter; Andrew Pinnell  
**Cc:** Planning  
**Subject:** Re: [Planning] Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

**March 14, 2023**

Re: Circulation for Comment - McBrine Drive & 1700 Strasburg Road (OPA/ZBA)

Municipality: Kitchener

Location: McBrine Drive & 1700 Strasburg Road

Owner/Applicant: 2140221 Ontario Inc.

Hello and apologies for the late response,

The Waterloo Region District School Board (WRDSB) has reviewed the above-noted application that proposes the development of a business park subdivision consisting of 10 industrial lots. The WRDSB offers the following comments:

### Student Transportation

The WRDSB supports active transportation, and we ask that pedestrians be considered in the review of all development applications to enhance safety and connectivity.

Strasburg Road is a primary access route for student transportation at Huron Heights Secondary School and it is imperative that it remain accessible and unencumbered throughout the construction process. We request that the City consider limiting construction vehicle traffic on Strasburg Road during arrival and dismissal times to ensure that active transportation pathways and bus routes are maintained.

### Noise and Debris

The proposed development is situated roughly 250m from Huron Heights Secondary School. The WRDSB asks that the appropriate debris containment and noise considerations are enacted to avoid negative school site impacts.

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The WRDSB requests to be circulated on any subsequent submissions on the subject lands and reserves the right to comment further on this application.

If you have any questions about the comments provided, don't hesitate to contact the undersigned.

Regards,



## Brandon Coveney

Senior Planner

**Waterloo Region District School Board**

51 Ardelt Avenue, Kitchener ON, N2C 2R5

Email: [brandon\\_coveney@wrdsb.ca](mailto:brandon_coveney@wrdsb.ca)

On Fri, Feb 17, 2023 at 3:40 PM Christine Kompter <[Christine.Kompter@kitchener.ca](mailto:Christine.Kompter@kitchener.ca)> wrote:

Please see attached. Additional documentation can be found in AMANDA folder 23-102603 and [ShareFile](#) (external agencies). Comments or questions should be directed to **Andrew Pinnell**, Senior Planner ([Andrew.pinnell@kitchener.ca](mailto:Andrew.pinnell@kitchener.ca); 519-741-2200 x7668).

### Christine Kompter

Administrative Assistant | Planning Division | City of Kitchener

200 King Street West, 6<sup>th</sup> Floor | P.O. Box 1118 | Kitchener ON N2G 4G7

519-741-2200 ext. 7425 | TTY 1-866-969-9994 | [christine.kompter@kitchener.ca](mailto:christine.kompter@kitchener.ca)





Six Nations of the Grand River Elected Council – Lands and Resources – Land Use Team  
Tel: 519-445-0330

1721 Chiefswood Road, Ohsweken ON N0A 1M0  
Fax: 519-753-3449

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October 15, 2025

To: City of Kitchener

Via: Email

Dear Garrett Stevenson and other relevant individuals,

Included are my environmental comments on behalf of Six Nations of the Grand River Elected Council (SNGREC) regarding the development at 1700 Strasburg.

### **Haldimand Tract and 1701 Nanfan Treaty Preamble**

Six Nations of the Grand River (SNGR) Territory is within the most highly urbanized land in Canada. Development has occurred on Six Nations' traditional territory without consultation or consent of SNGR. The cumulative effects of this intense development has contributed to significant environmental degradation and, as a result, Six Nations has experienced severe impacts on its ability to exercise Aboriginal and Treaty Rights that are not only set out in the treaties themselves but are also recognized and affirmed in Section 35 of the Constitution Act, 1982. These treaty lands are subject to unresolved litigation and any infringement upon our treaty rights must be fully mitigated by the proponent. The 1701 Nanfan Treaty guarantees SNGR's right to harvest and hunt on this property for perpetuity, but this proposal undermines those rights. SNGR must be accommodated to mitigate any harm to its treaty rights caused by the proponent.

### **SNGREC's Stance**

SNGREC is unsatisfied by this development. The Huron Natural Area is strongly valued by Six Nations of the Grand River (SNGR) members, who regularly advocate for expanded and enhanced protections. While any development near this culturally and environmentally sensitive territory is concerning, this proposal will result in impacts to Six Nations of the Grand River's Aboriginal and Treaty Rights. To be satisfied, SNGREC would need to see the implementation of the following mitigation and compensation measures.



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## **Next Steps**

### **Treaty Rights Compensation**

Further development of the land infringes on Six Nations Aboriginal and Treaty Rights by essentially guaranteeing land will not be returned to a natural state and by impacting the environment through emissions and use of resources. SNGREC requests that this development is paired with compensation for impacts to these rights and to the environment.

### **Regarding Wetland Creation**

SNGREC requests a wetland compensation areal ratio of 3:1 onsite or 4:1 offsite. Despite the manmade nature of the removed wetlands, they have had 30 years to develop and moving them will undo those 30 years. To compensate for throwing away that growth and succession time, risk of wetland failure, and negative effects of this development, SNGREC requires a much greater ratio than 1:1.

Please include SNGREC in consultation on the detailed design of the wetland area.

The presence of invasive plant species is also a threat to the success of the wetland. SNGREC requests the removal of invasive species from the property before wetland creation is finished and a thorough monitoring and management plan for invasive species on the property extending for a minimum of 5 years which resets if invasive species establish in this wetland.

What contingency plans will be prepared for the wetlands in case of habitat failure, and how much contingency funding will be allocated for these contingency plans?

### **Regarding wetland buffers**

SNGREC requests 41m buffers from all wetlands. This means extending HNA wetland buffers from 30 to 41m and increasing the 15m created wetland buffer. The 15m buffer afforded to the constructed wetland is frankly irresponsible. Created wetlands have high failure rates, and in the long run are intended to naturalize and be as functional as an existing, natural wetland. In this case the 15m buffer runs a high risk of water quality issues and habitat failure, especially with something as active as a roadway. This roadway will input salt and other pollutants while producing a great extent of disturbance due to vehicle traffic. SNGREC's proposed buffers are based on indigenous knowledge, experience, and perspectives paired with scientific research using studies such as Beacon Environmental's 2012 Ecological Buffer Guideline Review. Table 7 on page 88 is a potent summary of the effectiveness of various buffer sizes based on real world implementations.

### **Regarding Woodlot Buffers**

While HNA is given a 15m buffer, the woodlot around lots 8, 9, and 10 is only given a 10m buffer despite being



directly connected to HNA. SNGREC requests HNA and the adjacent woodlot are given 20m buffers to protect habitat function. SNGREC has had communication with the City of Kitchener that mentioned potential for this woodlot to be considered part of the HNA in the future, and thus it should be treated as part of HNA with regards to protection.

### **Regarding Turtle Nesting Areas and Buffers**

The three proposed turtle nesting areas are all proposed within the 15m buffer, meaning that the nesting areas themselves do not have their own buffers. SNGREC requests that turtle nesting areas are afforded a minimum buffer of 20m. Additionally, the 3 turtle nesting areas are insufficient relative to the estimated 7.8ha of turtle nesting area being removed. SNGREC requests a sizeable increase to created turtle nesting areas. Further, keeping a minimal size of turtle nesting areas increases the risk of encroachment by surrounding plant life, and thus these areas should be increased in size and count.

### **Regarding Exclusion Fencing**

While exclusion fencing is important to reduce road mortality, it also further restricts animal species, creating new hazards such as predatory choke points, reducing potential nesting and foraging, and reducing habitat connectivity. SNGREC requests that this is compensated for by reducing the scale of this development and improving habitat connectivity.

SNGREC requests that exclusion fencing includes access from the development side for small creatures in case they end up on the wrong side or travel from elsewhere.

### **Regarding the McBrine Drive Southerly Extension**

SNGREC requests the removal or deviation of the McBrine Drive southerly extension away from the created wetland. SNGREC acknowledges that the southerly extension is needed for emergency access, but requests the exploration of other options that could have reduced environmental impacts.

### **Regarding Landscaping**

SNGREC requests that native plant species are prioritized in landscaping efforts, and that invasive or potentially invasive species are completely avoided. Please provide SNGREC with a landscape plant list before procurement begins. The natural areas surrounding this development make plant selection even more important than for other sites. SNGREC requests that the proponent uses Kayanase Plant Nursery for procurement of plants if Kayanase's capacity allows.

### **Regarding Section 10.5 Ecological Corridors and Linkages: Native Shrub Planting**

SNGREC appreciates the City of Kitchener's commitment to replant any shrubs that do not survive.



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## Regarding Tree Compensation

SNGREC requests a 10:1 tree replacement ratio for all trees removed regardless of DBH and 1:1 for any dead trees/snags removed as these are an important habitat feature. A high tree replacement ratio helps to restore lost ecological function and considers time for regrowth and reduced survivability due to deer browsing and tree die-off. The goal of an increased tree replacement ratio is also to create habitat and strengthen ecological resilience.

Further, the higher tree replacement ratio better compensates for the long lasting, permanent impact of the development on the land that will no longer be able to be used by Indigenous people. The removal of or damage to the natural environment has an immense negative impact to Six Nations of the Grand River Aboriginal and Treaty Rights in this area. Planting additional trees and improving the environment helps make up for the negative impacts from development on these rights.

With the 750 proposed tree removals, this would require 7500 plantings as compensation. Despite being considered cultural environments, these trees should still be replanted fully. If this seems unfeasible, SNGREC suggests reducing the scale of development to remove fewer trees.

Planted trees must be site-specific native species and should be planted as close to the site as possible without impacting existing features and ecosystems.

The 10:1 ratio can be achieved by planting plugs or other earlier-growth trees, and they do not all need to be full street-tree size. Planting earlier-growth trees will require protection (i.e. herbivore browsing guards) and minor maintenance. SNGREC requires planting best practices are used and suggests collaboration with Kayanase Plant Nursery for recommendations and guidance.

Please be advised, as tree offset is not feasible onsite, SNGREC expects offset plantings to take place as close as reasonably possible to the impacted site. SNGREC encourages collaboration with the Grand River Conservation Authority, City of Kitchener, Region of Waterloo, RARE, or local property owners to achieve these offset plantings. Lastly, the Six Nations of the Grand River Environmental Levy may be considered should closer sites be unavailable. SNGREC expects that the tree replacement is paired with a robust and complete monitoring and maintenance plan complete with contingency actions to ensure successful establishment of the trees for long term success. Expanding upon the Huron Natural Area would be an excellent way to achieve this tree replacement ratio.

SNGREC requests that if plant species important to indigenous communities (see Six Nations Significant Plant List) are found and may be impacted, proponents contact Kayanase Restoration Company to collaborate on seed and plant collection and rescue. Contact details found later in this document.



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### **Regarding 12.1.4 Species at Risk and Wildlife Habitat – Bullet Point #31**

Please clarify what situations would require tree removal within the bird breeding and active bat season. SNGREC disapproves of this clause except for in hazardous situations such as trees that are expected to fall in a dangerous manner.

### **Regarding EIS Section 10.2 Wetlands – Strasburg Creek Provincially Significant Wetland Complex**

Please clarify, is silt fencing intended to be removed after construction? Silt fencing is designed to be removed after construction, and a more suitable exclusion fencing should be used for long-term fencing.

### **General Design Comment – Bird and Light Friendly Design**

SNGREC requests that the buildings and streetscapes are designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, and directing light downwards.

Please see the City of Toronto’s bird friendly practices for glass and for lighting as guidelines and implement them thoroughly across the entire design:

<https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf>

<https://www.toronto.ca/wp-content/uploads/2018/03/8ff6-city-planning-bird-effective-lighting.pdf>

### **References**

Beacon Environmental. (2012). Ecological buffer guideline review. Prepared for Credit Valley Conservation. Retrieved from <https://cvc.ca/wp-content/uploads/2021/06/Ecological-Buffer-Guideline-Review.pdf>

### **Kayanase Six Nations Native Plant Nursery and Restoration Company**

<https://www.kayanase.ca/>

**By Telephone:** 519-770-0013 or 519-732-6668 or 519-751-0568 to contact a Department Lead

**Nursery:** [sales@kayanase.ca](mailto:sales@kayanase.ca)

**Ecological Services:** [restoration@kayanase.ca](mailto:restoration@kayanase.ca)

**In Person:** Office Hours Monday to Friday: 8am to 4:30pm



Six Nations of the Grand River Elected Council – Lands and Resources – Land Use Team  
Tel: 519-445-0330

1721 Chiefswood Road, Ohsweken ON N0A 1M0  
Fax: 519-753-3449

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Thank you for taking my comments. I look forward to hearing and collaborating more on this project. Please do not hesitate to reach out if you have any questions or concerns.

Niá:wen (Thank you) and kind regards

Emmett Vanson, Land Use and Stewardship Technician  
Six Nations of the Grand River Elected Council