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Our ref: 12639057

23 July 2026

Al Rose
Stalwood Homes
44 University Avenue West
Cobourg, Ontario K9A 2G5

GHD EIS Response to GRCA Comments

Dear Al Rose,

This response has been prepared to address comments provided by Ken Thajer of the Ganaraska Region Conservation Authority (GRCA) on June 19, 2026. It specifically responds to the notes and observations regarding the wetland and watercourse setbacks associated with the watercourse located in the southeast corner of the proposed subdivision ('Site'). These comments are represented in the attached Figure 1 below.

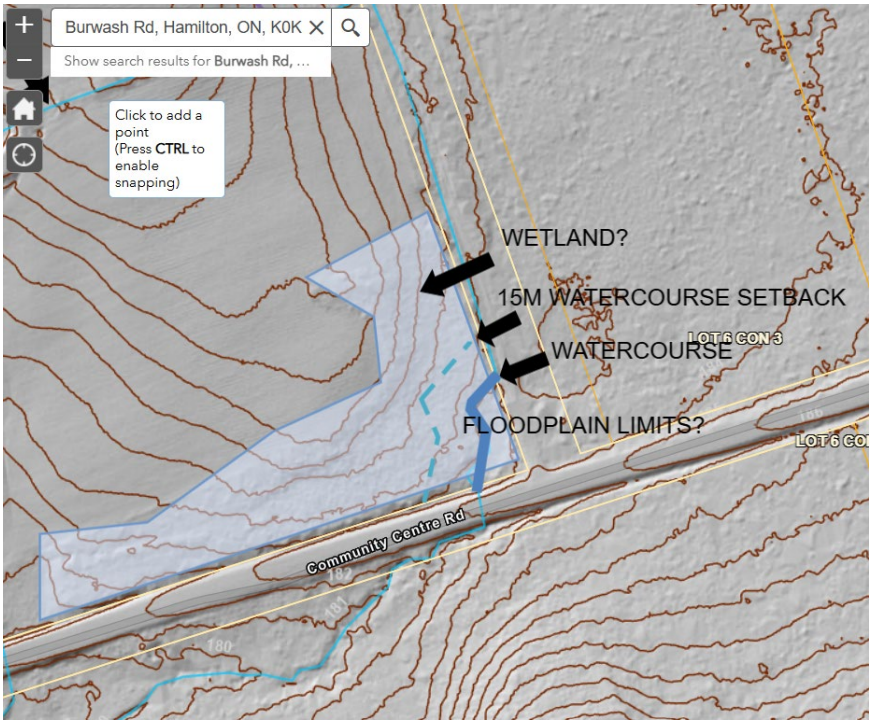

Figure 1 Wetland and Watercourse Setback for southeast corner of the proposed Burwash Subdivision

From the email received by Ken Thajer:

> *It is understood that this section of the property has had a wetland identified in the EIS. It has been confirmed that a watercourse exists in this area and would require a minimum setback for all development. Without the merit of a meander belt/erosion study, GRCA would generally assume a minimum 15m setback for all development inclusive of filling/grading. However, a greater setback may be recommended (such as 30m). The watercourse would also have an associated floodplain. GRCA does not have floodplain mapping for this feature. It would be recommended that a concept plan be provided showing all setbacks from the wetland and watercourse. GRCA may not require additional studies if all development is located outside the features, however, further discussion about development in this area will be warranted. To this end, a more detailed plan showing the boundaries of the features indicated about should be provided as well as the approximate location of SWM.*

GHD acknowledges and provides addendum information as follows:

Wetland Delineation

The area identified as wetland in the EIS report was based on the surficial vegetation observed at the time of the investigation, which was noted as being typical of wetland vegetation. The EIS did not specifically distinguish this area from the watercourse in the southeast corner of the property, nor did it account for the topography of the area.

The wetland boundaries identified in the EIS generally align with the wetland protection limits shown on the Township of Hamilton GIS resource. However, that GIS resource may also not have fully considered the local topography.

Since the initial investigation, removal of fence rows and surficial grubbing has exposed the underlying conditions in this area. This work confirmed that much of the vegetation was growing within elevated stone fence rows, rather than within ditches or low-lying wetland features. The originally identified wetland is now more representative of a damp coniferous community (FOC 4) with inclusion of riparian characteristics due to the watercourse and roadside ditch. The resulting setback from these fence rows also includes farmland that remains in active agricultural use.

Recommended Setback

Ken Thajer has indicated that, in the absence of additional information regarding floodplain boundaries, a minimum 15 m setback from the watercourse may be acceptable, although a greater setback of up to 30 m could be required. GHD agrees that a minimum 15 m setback from the high-water mark of the watercourse is appropriate, the setback would protect the form and function of the watercourse and avoid significant impacts to fish and fish habitat.

GHD further recommends that the setback extend, where necessary, to match the elevation of the top of asphalt on Burwash Road. This road elevation represents the maximum height to which the watercourse can rise in this area, and the lands south of Burwash Road are notably lower.

Accordingly, GHD recommends that the protected setback—and, by extension, the practical demarcation of the wetland limit—be defined as the greater of the following:

– 15 m from the watercourse; or
– the elevation corresponding to the top of asphalt on Burwash Road.

Should there be any additional comments, concerns, or a request for additional clarification on the content of GHD's reports, please reach out to our team.

Regards,

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