



June 19, 2025

Project Name: Elfrida Lands – Urban Expansion Area OPA  
DOCA Project Number: 2024-0652  
Proponent: Elfrida Community Builders' Group

Dear Hatim Jafferjee,

This letter is to confirm receipt of the project-related correspondence sent by Delta Urban Inc. on behalf of Elfrida Community Builders' Group regarding Elfrida Lands – Urban Expansion Area Official Plan Amendment.

The Mississaugas of the Credit First Nation (MCFN) are the Treaty Holders of the land on which the project will take place – specifically, the Between the Lakes Treaty #3 (1792). The MCFN holds Indigenous and Treaty Rights specific to the project location and its environs, which may be adversely impacted by it. The Department of Consultation and Accommodation (DOCA) is designated by the MCFN to handle consultation matters on its behalf.

The DOCA consultation team has reviewed the project-related correspondence identified above, in addition to any associated documentation. The following DOCA Units have completed a review and their questions and comments have been included below.

### **Archaeology Unit**

Primary Reviewer: Adrian Blake, Archaeologist

#### Questions and Comments

- We have reviewed the Stage 1 archaeological assessment completed by ASI and are largely in agreement with the results and recommendations presented therein.
- However, the Stage 1 relies on an older assessment completed in 1989 by Mayer, Poulton, and Associates Inc. This assessment identifies three archaeological sites which were considered “clear” of further archaeological concern by 1989 standards: AhGw-72, AhGw-73, and AgGw-8. MCFN does not support this conclusion. MCFN expects that these three sites be subject to reassessment, along with the other three archaeological sites identified by ASI for reassessment. We suggest the protocol recommended by ASI within their Stage 1 report for this reidentification and reassessment.
- MCFN expects to be meaningfully engaged during the upcoming Stage 2 archaeological assessment, through in-field participation and report review. Please let us know when this assessment is scheduled to take place.



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## Environment Unit

Primary Reviewer: Lindsay Wong, Manager of Environment

### Questions and Comments

- It is very concerning to see such a large parcel being proposed to be taken up outside of the current urban boundaries of the City of Hamilton. We strongly disagree that the case has been adequately made that there is a need for this expansion.
- Even if all woodland and wetlands features were to be retained, they would lose all connectivity to the greenbelt. Areas adjacent to the greenbelt are very valuable to ensure the continued ecological integrity of those lands.
- While a rural area could be considered transit supportive, ultimately the location is so far out of Hamilton that people will mostly rely on cars. A bus route will not add much to the sustainability of the area.
- Given the long-term ecological implications of this urban expansion, we require the completion of a full environmental impact study for the overall urban boundary area. The EIS should evaluate the cumulative effects of urbanization, including loss of agricultural soil, stormwater impact, and habitat fragmentation.
- Are there any specific examples of what pilot projects and community energy plans might look like as mentioned in the ECCA report?

Until the questions, concerns, and/or interests identified in this letter have been satisfactorily addressed, the project must not receive approval or proceed with any ground-altering activities. We request a response to our feedback within two to three weeks' time.

DOCA expects to be notified of any and all future project updates and/or changes.

If you have any questions for the DOCA consultation team, please feel free to contact us.

Thank you,

*Megan De Vries*

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