



Comment Summary - CBM Aberfoyle South Pit

Consultant	Comments
County of Wellington Planning	See letter attached
GM BluePlan	See letter attached
Township Hydrogeologist	See letter attached
Township Ecology Consultant	See letter attached
Township Traffic Consultant	The applicant is to provide a terms of reference for the Transportation Impact Study for review to ensure that the study is addressing the various comments previously provided by the Township and its consultants.
Township of Puslinch Fire Department	Puslinch Fire and Rescue Services have no concerns with the CBM Aberfoyle proposal as outlined in the proposal documentation and presented by the CBM delegation
Township of Puslinch Building Department	Are the existing barn/shed and house to be removed as part of the expansion? If yes, a demolition permit is required before removing the buildings.
Township of Puslinch By-law Enforcement	By-law has no comments are concerns at this time.
Township of Puslinch Public Works	Concur with comments from GM Blue Plan, County of Wellington Planners and Township Traffic Consultant



Source Water	See letter attached
GRCA	See letter attached
Rob Stovel – Township Planning Consultant	See letter attached



COUNTY OF WELLINGTON

PLANNING AND DEVELOPMENT DEPARTMENT

Aldo L. Salis, BES, M.Sc. MCIP, RPP Director of Planning and Development

TEL: (519) 837-2600

FAX: (519) 823-1694

1-800-663-0750

ADMINISTRATION CENTRE

74 WOOLWICH STREET

GUELPH, ONTARIO

N1H 3T9

September 8th, 2023

Township of Puslinch
7404 Wellington Road 34
Guelph, ON N0B 2J0

Dear Ms. Lynne Banks:

**Re: Pre-consultation Request – New Aggregate Operation (Lake Pit – Concession 2)
6947 Concession Road 2**

Thank you for circulating the request for pre-consultation comments for the above-noted property. We understand that an Official Plan Amendment and a Zoning By-law Amendment application will be required for the subject development.

As part of the pre-consultation, we have reviewed the following submitted items:

- Application and Submission Proposal
- Context Plan
- Application Update Letter (dated July 26th, 2023)

Based on our review of the above information and the information provided at the July 27th 2023 meeting with the applicant, we offer the following County planning comments for consideration and list of studies to be submitted as part of a Complete Application for an Official Plan Amendment:

Proposal:

- Below the water table pit and a Class 'A' License under the ARA
- Site is approximately 88.5 ha
- Licensed boundary proposed to be approximately 44.8 ha
- Limit of extraction proposed boundary approximately 27.5 ha
- One new entrance is proposed for access and the site is intended to be operated as a "Feeder Pit" with materials being brought to the Aberfoyle South Pit for processing.
- No on-site processing or washing is proposed.

General Comments – Key Items from Pre-consultation Meeting:

- It is understood that:



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- Stockpiling, on-site processing or blending are not proposed to take place on-site.
- Anticipated life of the pit is 7-8 years based on an annual tonnage of 1.25 million tonnes.
- The intent is to submit the ARA application and the *Planning Act* applications concurrently.
- It is understood that there are archeological features on-site and the Ministry is considering a phased approach for the assessment of these features. Additional discussion regarding this approach will likely be required.
- Source Water Protection staff have identified that this area is a Significant Ground Water Recharge Area.

General Comments:

- It is our practice to request that the ARA Site Plans and associated studies be submitted as part of a complete application. It is further noted that the County continues to issue standard “Letters of Objections” as part of the ARA process.
- The applicant may want to consider if additional public engagement is required and how the ARA public engagement process and the *Planning Act* public engagement process will be coordinated.
- The Township may wish to comment on any additional safety protocols for entrances and trucks on-site and the need for on-site weight scales.
- The Township may also wish to consider if they are amendable to allowing the Zoning By-law Amendment to be submitted concurrently with the Official Plan amendment, due to Bill 109 changes.
- It is noted that the license boundary extends to a portion of the site that is not intended to be extracted. Consideration should be given if this area should form part of the license or if the license should solely include the extraction area. It is further noted that the license area excludes the natural features, which we agree is an appropriate approach.
- **Provincial Policy Considerations:**
 - *Provincial Policy Statement (2020)*
 - Lands are partially within the Prime Agricultural designation.
 - Conformity with the PPS is required, including assessing Section 2.5.4 Extraction in Prime Agricultural Areas.
 - *Growth Plan*
 - Entire site is subject to the Natural Heritage System.



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- The Agricultural System identifies mainly “candidate area” with some prime agricultural lands identified.
 - Consistency with the Growth Plan is required, including assessing Section 4.2.3, 4.2.4 and 4.2.8.2.
 - Due to the lands being within the Prime Agricultural Areas an Agricultural Impact Assessment is required.
- *Greenbelt Plan*
 - Located outside of the Greenbelt Plan; however, please be aware that the Greenbelt has previously been proposed to be expanded but appears to be on hold.
- **County of Wellington Official Plan:**
 - Designation – the subject lands are currently designated as:
 - Primarily Secondary Agricultural with some Prime Agricultural designation on-site.
 - Core Greenland System due to the presence of Floodplain, Provincially Significant Wetland and locally significant wetlands
 - Greenland System due to the presence of an Environmentally Sensitive Area (ESA) and Significant Woodlands
 - The ESA is known as the Galt Creek and Forest
 - Identified as a source for maintaining hydrological balance; includes rare plant species, unique to the expansive area it covers, and highly probably it is susceptible to negative impacts.
 - Will need to demonstrate that the development will not negatively impact the feature or its function.
 - The shared peer review ecologist will need to be satisfied these policies are addressed.
 - The following policies will also need to be assessed:
 - Mineral Aggregate Areas:
 - 4.9.5.9 Mineral Aggregate Resources
 - 5.6.6 Mineral Aggregate Areas
 - Subject to 9.9.10.2 (if in Greenbelt)
 - 6.6.5 New or Expansions
 - 6.6.8 Rehabilitation



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- 6.6.9 Mining Below Water Table
 - Rehab back to agricultural uses non requirement if demonstrates policies of this section
- A portion of the site is identified as being subject to the Paris Galt Moraine Policies. Section 4.9.7 will need to be addressed and it will need to be demonstrated that groundwater and surface water functions will be maintained and where possible enhanced.
- Mill Creek Watershed – Section 4.10.1
 - Demonstrate development does not impact the existing function or recharge and discharge
- Source Water Protection:
 - Portion of Paris Galt Moraine
 - SGRA groundwater recharge area
 - A Source Water Protection Screening Form is required
- An Official Plan Amendment is required to identify these lands as a Mineral Aggregate Area on Schedule A and to add to the Mineral Resource Area (Schedule C) as tertiary materials are not identified in the Official Plan.
 - Study and testing utilized to determine material quality and quantity is to be submitted as part of a complete application.
- **County Application Required:**
- *Official Plan Amendment*
 - Amendment to Mineral Aggregate Areas on Schedule A7
 - Identify the minerals in schedule C

It is understood that an associated Zoning By-law amendment application will also be required. The County will review in our capacity as a commenting agency.

Submission Requirements for Official Plan Amendment:

Included below is a preliminary list of potential supporting studies that are required. The list of studies/assessments identifies minimum requirements.

- Planning Justification Report and amendment By-law for OPA
- Environmental Impact Study
 - Township, County and GRCA to be circulated on Terms of Reference



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- The Township has retained Aboud and Associates – the County will rely on their expertise to address the County and Provincial policy requirements.
 - To address Provincial and Official Plan policies
- Traffic Impact Assessment
 - This is specifically Terms of Reference to be reviewed by the Township.
 - Comments on traffic will be provided by the Township.
 - The County may want to review and access any potential impacts to the County Road, if applicable.
- Hydrogeological Assessment (Cumulative Impact Assessment)
 - Also address the Paris Galt Moraine policies
- Noise Impact Assessment
 - Include the dwelling being retained.
- Dust Impact Study & Mitigation Plan
- Archaeological/Cultural Heritage Assessment
- Agricultural Impact Study
- Visual Impact Study
- Geological Report and associated testing prepared to determine materials, type and quantity.
- Copies of the ARA Site Plan Submission and the studies submitted through the ARA process.

These comments are preliminary and may change as the development progresses and as more details are provided.

I trust these comments will be of assistance if you have questions, please contact the County of Wellington Planning and Development Department.

Yours truly,



Meagan Ferris, RPP MCIP

Manager of Planning and Environment



August 8, 2023
Our File: 121006-036

Township of Puslinch
7404 Wellington Road 34
Guelph, ON N0B 2J0

Attention: Ms. Lynne Banks

Re: Pre-Consultation for Proposed Pit Expansion
CBM Aggregates
6947 Concession #2
Cambridge, ON, N3C 2V4

Dear Ms. Banks,

The first Pre-Consultation meeting for the proposed Pit Expansion was on September 28, 2021. The proponent subsequently updated their application, and a second Pre-Consultation meeting was held on July 37, 2023. The first Pre-Consultation meeting was an introduction to the proposal and included a conceptual plan. There were no formal engineering comments prepared at that time in 2021. Submission documents for the proposed pit expansion were received from the Township on July 7 and July 26, 2023.

The following documents were received and reviewed as part of the proposed pit expansion application:

- Pre-Consultation Request received July 7, 2023.
- Figure No 1, Context Plan, prepared by MHBC, dated October 2022.
- CBM Aberfoyle South Pit Expansion Application Update, prepared by MHBC, dated July 26, 2023.

On July 27, 2023, a Pre consultation meeting was held at the Puslinch Community Center, to review the proposed pit expansion with Township staff, Township review consultants, representatives of CBM Aggregates and their Consulting team.

Based on our review of the provided documents, and discussions from the July 27, 2023, Pre-Consultation meeting we provide the following comments regarding the submission for expansion of the South Aberfoyle Pit.

Deficiencies/Outstanding Matters

Item No.	Matter / Requirement	Drawing / Document Reference	Date Issue Identified	Comment
1.	Access to Concession 2	Concept Plan	July 27, 2023	It was noted by the Director of Public works that the site will be permitted the existing residential entrance and 1 new entrance for the proposed pit. Location of Pit entrance to take into consideration the distance from the Conc 2 / Sideroad No 20 intersection. Proponent to provide a copy of the traffic study and consider the requirement for an accelerator lane for loaded trucks entering Concession No 2

Item No.	Matter / Requirement	Drawing / Document Reference	Date Issue Identified	Comment
2.	Existing Condition of Concession 2	Pre-Consultation discussion	July 27, 2023	Township staff confirm that Concession 2 has only a single lift of asphalt west of the existing MacMillan pit entrance. Proponent to investigate the existing road structure and provide a geotechnical investigation and identify any required upgrades to support the increased use of the gravel hauling trucks, from the MacMillan entrance to the proposed site access
3.	Existing Bridge Structure 2012	Pre-Consultation discussion	July 27, 2023	The Township noted that the new pit location will increase the loading on the existing bridge on Conc 2 just west of SDR 20. Township will review the most recent OSIM inspection report and advise of any concerns
4.	Site Entrance paving	Pre-Consultation discussion	July 27, 2023	New entrances onto Concession No 2 are to be paved 20m before the edge of travelled lane to reduce debris tracked onto Concession 2.
5	Road Maintenance	Pre-Consultation discussion	July 27, 2023	Proponent to include a maintenance plan for Concession No 2, to address dust mitigation and mud / debris cleanup.
6	Entrance Permit	Pre-Consultation discussion	July 27, 2023	Township staff confirmed that the new site entrance will require an entrance permit
7.	Feeder Pit to Processing Pit	Pre-Consultation discussion	July 27, 2023	Township staff noted a potential concern with overloaded gravel haulers between Feeder to Processing pits; this will limit lifecycle of road and bridge
8	Traffic Study	Pre-Consultation discussion	July 27, 2023	The Proponent noted that a traffic study has been prepared, please provide a copy of the traffic study for review by the Township.

Additional Commentary

Item No.	Additional Commentary
1.	Please provide review comments as received by the GRCA.
2.	The bridge on Concession No. 2 is referenced in the Township OSIM records as Structure 2012.

Completed/Approved

Item No.	Matter / Requirement	Drawing / Document Reference	Date Issue Identified	Date Issue Cleared	Comment

If you have any questions or require additional information, please do not hesitate to contact us.

Yours truly,

GM BLUEPLAN ENGINEERING

Per:



Steve Conway, CET, rcsi, PMP
Senior Project Manager



Harden Environmental Services Ltd.
4622 Nassagaweya-Puslinch Townline
Moffat, Ontario, L0P 1J0
Phone: (519) 826-0099 Fax: (519) 826-9099

Hydrogeological Assessment

Geochemistry

Phase I / II ESA

Regional Flow Studies

Contaminant Investigations

OLT Hearings

Water Quality Sampling

Groundwater & Surface Water
Monitoring

Groundwater Protection
Studies

Groundwater Modelling

Groundwater Mapping

Permits to Take Water

Environmental Compliance
Approvals

Designated Substance Surveys

Our File: 2340

August 8, 2023

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

Attention: Lynne Banks
Development and Legislative Coordinator

**Re: Pre-Consultation Comments
CBM Aberfoyle South Expansion, Puslinch, Ontario**

Dear Lynne,

Harden Environmental Services Ltd. (Harden) is pleased to provide these preliminary hydrogeological comments on the zoning by-law amendment application for the CBM Aberfoyle South expansion site located at 6947 Concession Road 2 in Puslinch, Ontario (the Site). CBM Aggregates (CBM), a division of Votorantim Cimentos, plans to submit an application for site expansion to the Ministry of Northern Development and Mines (NDMNRF) for a Class "A" licence (below water table pit) under the Aggregate Resources Act (ARA).

The Site is approximately 88.5 hectares, which includes 27.5 ha of proposed extraction area within a proposed licensed boundary of 44.8 ha. The Site is currently zoned as Greenlands and Core Greenlands, and is outside of the mapped primary and secondary sand and gravel resource areas designated by the Mineral Aggregate Resource Overlay (Schedule "C" of the Wellington County Official Plan). The Site also encroaches on and may cross into a portion of the Paris-Galt Moraine at the west side of the Site (Schedule B7 of the Wellington County Official Plan).

Harden attended a pre-consultation meeting with the proponent and planning staff on July 27, 2023. In addition to our meeting notes, we have reviewed the following documents as part of this review:

1. Golder. 2021. Technical Memorandum: Terms of Reference for Natural Environment and Water Resources Technical Studies for the CBM Aberfoyle South Pit Expansion, Township of Puslinch, Ontario. Project No. 1791470, dated October 12, 2021.
2. MHBC. 2023. Re: CBM Aggregates Proposed Aberfoyle South Pit Expansion – Application Update. File Y321AB, dated July 26, 2023.

Harden provides the following comments:

1. The western portion of the Site encroaches on or may cross into the Paris Galt Moraine Policy Area under Schedule B7 of the County of Wellington Official Plan and the Section 4.9.7 Policies and Objectives may apply. It is recommended that this be verified by planning staff due to the proximity of the Paris Galt Moraine area.
2. The Mill Creek Aggregates site (operated by Dufferin Construction) has a lengthy history of water level and water quality data from the local area surrounding the Site. We understand from the proponent's hydrogeologist (George Schneider) that WSP has a copy of a former annual monitoring report. We encourage WSP to review the information and consider the impacts that could occur to water levels in monitors in their program. There are well-established threshold limits that Mill Creek Aggregates must adhere to, including maintaining hydraulic gradients to Mill Creek. These requirements should be reviewed and the proposed works' impact on them evaluated.
3. Harden has sent George Schneider (WSP) an updated database of water levels obtained from the Puslinch Groundwater Monitoring Network. Historical monitoring data are available at www.hardenv.com.
4. Mill Creek runs along the eastern and southern extents of the Site, and a tributary of Mill Creek runs through the Site. Provincially Significant Wetland (PSW) areas of the Mill Creek Puslinch Wetland Complex also surround the proposed extraction area on the Site. We understand that Mill Creek has a vibrant fishery in the area west of the Mill Creek Aggregates site and groundwater upwells into the stream. Mill Creek is a cold-water stream dependent on groundwater inputs; as such, any groundwater discharge function of the Site to the wetlands and Mill Creek must be maintained. Any monitoring program proposed for the Lake Pit should include stations that will confirm that this condition will not change. We are aware that the landowner immediately west of Mill Creek, on the north side of Concession Road 2, has historically had concerns about Mill Creek as it passes through/alongside their property. The applicant should be prepared to address the landowner's concerns.

5. Thermal impacts downgradient of the pit will have to be addressed with verification monitoring proposed during and post extraction.
6. Water level changes in the upgradient areas and downgradient areas may affect wetlands. Appropriate monitoring of wetland hydroperiods prior to, during and post extraction will be required with appropriate contingency and mitigation measures included in the monitoring plan.
7. The former conceptual mining plan presented to the Township of Puslinch did not represent the final rehabilitation as one lake on the Site. The former conceptual plan was a series of isolated mining areas designed to minimize groundwater level changes across the Site. The proposed final rehabilitation to one lake introduces greater potential for impact to water levels upgradient and downgradient of the pit. It is well known that water levels will decrease in the upgradient area and increase in downgradient area of the proposed lake. The potential impacts of this type of water level change were presented during the hearing for the Mill Creek Aggregates site and potential impacts were identified early on in the application process. Our comment is that potential impacts to groundwater discharge in the area upgradient of the proposed pit will have to be well evaluated and robust monitoring proposed for verification with adequate contingency plans for mitigating the effects.
8. Considering the described modeling domain, it appears that all below-water-table extractive activities in the Concession Road 2 area are captured. This will make it possible to address the cumulative impact issue raised by the County of Wellington. We recommend that equivalent pumping rates for the 1.25 million tonne extraction rate be used for this site and the equivalent pumping rate based on maximum allowable tonnage be used for the other sites. Based on the response provided in the meeting, we understand that this site will be mined below the water table at the same time as Neubauer, Lanci and ongoing extraction in Mill Creek Aggregates.
9. The model should identify the zone of influence from water level changes to a minimum change of 10 cm during and post extraction. Acceptable water level changes will have to be determined with the Township ecologist.
10. The report should identify contingency plans and mitigation plans in the event that water level changes are unacceptable.
11. The potential public use/beneficial flood control use/fisheries benefits of this site post-extraction should be explored and presented. The Snyder's Flats recreational area, located in the floodplain of the Grand River near Waterloo, was provided as an example during the July 2023 pre-consultation meeting.

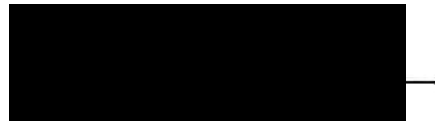
12. In addition to a Hydrogeological Study and Groundwater and Surface Water Impact Assessment, the proponent should retain a qualified geoscientist or engineer to prepare an Aggregate Resources Assessment for the Site. The report should include the locations, types, quality, and quantity of aggregate resources located on the Site.
13. The quality and quantity of aggregate is of concern to the Township. Like the issues raised in the Neubauer Application, the ultimate fate of silty material can have an impact on groundwater flow in the Mill Creek area. Appropriate licensing, ecological evaluations and hydrogeological evaluations will be necessary to verify that silt deposition is not having an impact and that the ultimate size of silt deposition areas are identified on site plans having had the appropriate level of evaluation for a major site plan amendment.
14. Harden is concurrently involved in a conflict between the Township and the proponent for the proposed processing location for the Site (Aberfoyle South Pit, License #5497 and adjacent License #5520) due to infilling of pond areas with silt that are neither identified on the approved site plans nor evaluated with respect to potential ecological impacts. We anticipate that the same conflict will affect the current zoning application for the Site unless a resolution can be reached prior to application submission.
15. We understand that the proponent will be providing the applicable studies/reports prior to submission of the application to allow for preliminary comments. We look forward to the opportunity to review the hydrogeological study and groundwater and surface water impact assessment, as well as the groundwater model and aggregate resources assessment for the Site.

We appreciate the opportunity to provide these comments. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Harden Environmental Services Ltd.

A black rectangular redaction box covering the signature of Angela M. Mason.

Angela M. Mason, M.Sc., P.Geo., QP_{ESA}
Senior Hydrogeologist

A black rectangular redaction box covering the signature of Stan Denhoed.

Stan Denhoed, P.Eng., M.Sc.
President and Senior Hydrogeologist



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EDGE MANAGEMENT PLANS
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NATURALIZATION PLANS
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CONTRACT ADMINISTRATION

ENVIRONMENTAL STUDIES
SUBWATERSHED STUDIES
ENVIRONMENTAL IMPACT
STATEMENTS
ECOLOGICAL LAND
CLASSIFICATION
WETLAND EVALUATION
VEGETATION ASSESSMENT
BOTANICAL INVENTORIES
WILDLIFE SURVEYS
MONITORING

LANDSCAPE ARCHITECTURE
MASTER PLANNING
RESIDENTIAL COMMUNITIES
COMMERCIAL/INDUSTRIAL
HEALTHCARE AND EDUCATION
STREETSCAPES
PARKS AND OPEN SPACES
TRAIL SYSTEMS
GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION
LPAT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

August 17, 2023

Our Project #: AA21-049A-004C

Sent by email: jbrotherston@puslinch.ca
lbanks@puslinch.ca

Justine Brotherston, Deputy Clerk
Township of Puslinch
7404 Wellington Rd. 34
Puslinch, ON N0B 2J0

**Re: CBM Aberfoyle South Pit Expansion, Township of Puslinch
Ecological Constraint Review, Pre-Consultation request (R1)**

Dear Ms. Brotherston:

Aboud & Associates Inc. has been retained by the Township of Puslinch to complete an Ecological Constraint Review of the 2023 pre-consultation documents for the proposed Expansion of the Aberfoyle South Pit. We have reviewed the following documents as part of our assessment:

- Pre-Consultation request, entry #9075, CBM aggregates.
- Aerial photography of the subject site, Google satellite imagery, SWOOP 2015,
- Wellington County Official Plan (June 2022, consolidation), including Section 5.0 Greenlands Systems policies,
- Township of Puslinch Comprehensive Zoning Bylaw No. 023-18 (May 2021 consolidation) Schedule A,
- The Provincial Policy Statement, Ministry of Municipal Affairs and Housing, 2020,
- A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 office consolidation,
- Wellington County Draft Natural Heritage System Mapping, accessed July 2023,
- GRCA mapping (accessed June 2023) of natural heritage features and
- Natural Heritage Information Center, Make-a-Map, accessed June 2023.

Our review has identified the following regarding the presence of ecological constraints or concerns, as they relate to the proposed Aggregate extraction expansion.

Legislation	Policy constraint present	Study Requirement
Fisheries Act, 1985	Watercourses (Mill Creek and an unnamed tributary) are identified as present within 120m of the property	Aquatic habitat assessment, fish community sampling
Species at Risk Act, 2002	Watercourses, regulated under SARA, are present within 120m of the study area. However, aquatic species at risk are unlikely to occur per the background review.	Determine presence/absence of any SARA listed species.
Endangered Species Act, 2007	<ul style="list-style-type: none"> Our Species at Risk review of the NHIC 1km squares, Ontario Reptile & Amphibian Atlas, Ontario Breeding Bird Atlas, and Atlas of the Mammals of Ontario, determined that habitat for several Species at Risk is likely to occur within the proposed expansion area and adjacent lands. This list includes the following species with regulated habitat protection: Eastern Meadowlark (NHIC) Bobolink (NHIC) Blanding's Turtle (ORAA) Jefferson's Salamander (ORAA) Bank Swallow (OBBA) <p>Species at risk should be considered to ensure compliance with the ESA should any Natural features, trees or buildings be removed.</p>	Candidate habitat is present, and surveys should be conducted to confirm presence/absence of SAR species with candidate habitat.
Provincial Policy Statement, 2020	<ul style="list-style-type: none"> The MNRF Natural Heritage System mapping and the Wellington County Draft Natural Heritage System mapping includes the proposed Pit Expansion lands. The wetland and woodland are identified as a Deer Wintering Area (Stratum 2), which requires discussion with the MNRF to determine requirements. Species of Special Concern and rare species were identified in our background review, and due consideration for these species and 	Significant woodlands, significant wetlands, candidate significant wildlife habitat and surface water features are present in the study area and should be studied and considered.

	their habitat should be considered under Significant Wildlife Habitat.	
A Place to Grow, Growth Plan for the Greater Golden Horseshoe, 2020	The site is within the boundaries of the Growth Plan for the Greater Golden Horseshoe and include lands within the Natural Heritage System identified as Key Hydrologic Features. Key Hydrologic Features are described as the following: <i>Permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs, and wetlands.</i>	Lands identified as Key Hydrologic Features are present in the study area and should be studied and considered.
Ontario Regulation 150/06	GRCA regulated habitat is present within the proposed extraction area and adjacent lands, including Floodplain, the Mill Creek Puslinch Provincially Significant Wetland, and Mill Creek.	Studies to determine impacts to wetlands, surface water, and hazard lands are required.
Wellington County OP, June 2022 Consolidation	The Wellington County Official Plan Schedule A7 identifies that the entirety of the site is Core Greenland and Greenland, including hazard lands throughout most of the site.	Studies to determine impacts to hazard lands, Core Greenland, Greenland, quality and quantity of surface and groundwater, are required.
Township of Puslinch Comprehensive Zoning By - Law No. 023-18	Per the Township of Puslinch Zoning By-law, the subject property is within lands designated as Environmental Protection Overlay and Natural Environment with a small area of Agriculture.	Development within the Environmental Protection Zone overlay is not permitted unless it has been demonstrated to the satisfaction of the township that there will be no negative impacts on the habitat or ecological function of the natural heritage feature. Studies to identify all natural heritage features and determine appropriate setbacks and mitigation are required.

In conclusion, as identified in our 2021 review of the pre-submission documents and background information, we have determined that significant natural heritage resources and the potential for significant negative impacts to sensitive resources are present within and adjacent to the proposed development, based on the scale and expected impacts of the proposed development.

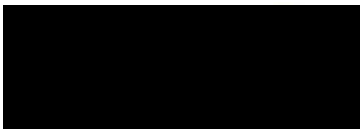
A meeting to discuss the proposal occurred on July 27, 2023, which included a review of planning, natural heritage and hydrological concerns related to the project. Per the results of the discussion, a revised ToR is to be submitted in response to the previous ToR review provided to the Township in 2021. We would like to ensure the following studies continue to be included in the natural heritage and hydrological studies:

- feature based water balance assessment of the wetlands present on/adjacent to site (TRCA wetland water balance risk evaluation (2017), or equivalent), discussion of impacts to the wetland due to any proposed changes to the quality or quantity of water should be included in the report,
- Review the Mill Creek Subwatershed study, determine if any additional requirements are identified,
- Headwater drainage feature assessment (TRCA, 2014 guideline),
- Breeding bird survey,
- Herptile surveys (including Salamander visual egg mass surveys of any present vernal pools, amphibian call count surveys, and visual surveys for snakes and turtles (following the MNRF Blanding's Turtle protocols),
- 3 season botanical study,
- Ecological Land Classification,
- Woodland dripline survey,
- Updated Wetland Limit survey and confirmation with GRCA,
- Species at Risk Habitat Assessment, (including species specific surveys for any species with candidate habitat on site),
- Significant Wildlife Habitat Assessment,
- Linkage and connectivity assessment,
- Aquatic Habitat Assessment,
- Fish community sampling,
- Pre, during and post development comprehensive monitoring plan, which includes adaptive management and appropriate triggers for additional investigation,
- Restoration plan, and buffer enhancement/planting plan.

A revised Terms of Reference should be provided prior to submission of the Natural Heritage Study. Please contact the undersigned should you require additional information or discussion of the above.

Yours truly,

ABOUD & ASSOCIATES INC.



Cheryl-Anne Ross, B. Sc. F.W.T.
Ecology Lead & Wildlife Ecologist



3-5 Edinburgh Road South
Guelph . Ontario
N1H 5N8

519.822.6839

info@aboudtng.com

www.aboudtng.com

URBAN FORESTRY
ARBORIST REPORTS
MANAGEMENT PLANS
TREE PRESERVATION PLANS
TREE RISK ASSESSMENT
GIS TREE INVENTORIES
TREE APPRAISALS
MONITORING

ECOLOGICAL RESTORATION
NATURAL SYSTEMS DESIGN
HABITAT RESTORATION
EDGE MANAGEMENT PLANS
RAVINE STEWARDSHIP PLANS
NATURALIZATION PLANS
INTERPRETIVE DESIGN
MONITORING
CONTRACT ADMINISTRATION

ENVIRONMENTAL STUDIES
SUBWATERSHED STUDIES
ENVIRONMENTAL IMPACT
STATEMENTS
ECOLOGICAL LAND
CLASSIFICATION
WETLAND EVALUATION
VEGETATION ASSESSMENT
BOTANICAL INVENTORIES
WILDLIFE SURVEYS
MONITORING

LANDSCAPE ARCHITECTURE
MASTER PLANNING
RESIDENTIAL COMMUNITIES
COMMERCIAL/INDUSTRIAL
HEALTHCARE AND EDUCATION
STREETSCAPES
PARKS AND OPEN SPACES
TRAIL SYSTEMS
GREEN ROOFS
CONTRACT ADMINISTRATION

EXPERT OPINION
LPAT TESTIMONY
LEGAL PROCEEDINGS
PEER REVIEW
RESEARCH
EDUCATION

August 17, 2023

Our Project #: AA21-049A-004C

Sent by email: jbrotherston@puslinch.ca
lbanks@puslinch.ca

Justine Brotherston, Deputy Clerk
Township of Puslinch
7404 Wellington Rd. 34
Puslinch, ON N0B 2J0

**Re: CBM Aberfoyle South Pit Expansion, Township of Puslinch
Ecological Constraint Review, Pre-Consultation request (R1)**

Dear Ms. Brotherston:

Aboud & Associates Inc. has been retained by the Township of Puslinch to complete an Ecological Constraint Review of the 2023 pre-consultation documents for the proposed Expansion of the Aberfoyle South Pit. We have reviewed the following documents as part of our assessment:

- Pre-Consultation request, entry #9075, CBM aggregates.
- Aerial photography of the subject site, Google satellite imagery, SWOOP 2015,
- Wellington County Official Plan (June 2022, consolidation), including Section 5.0 Greenlands Systems policies,
- Township of Puslinch Comprehensive Zoning Bylaw No. 023-18 (May 2021 consolidation) Schedule A,
- The Provincial Policy Statement, Ministry of Municipal Affairs and Housing, 2020,
- A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 office consolidation,
- Wellington County Draft Natural Heritage System Mapping, accessed July 2023,
- GRCA mapping (accessed June 2023) of natural heritage features and
- Natural Heritage Information Center, Make-a-Map, accessed June 2023.

Our review has identified the following regarding the presence of ecological constraints or concerns, as they relate to the proposed Aggregate extraction expansion.

Legislation	Policy constraint present	Study Requirement
Fisheries Act, 1985	Watercourses (Mill Creek and an unnamed tributary) are identified as present within 120m of the property	Aquatic habitat assessment, fish community sampling
Species at Risk Act, 2002	Watercourses, regulated under SARA, are present within 120m of the study area. However, aquatic species at risk are unlikely to occur per the background review.	Determine presence/absence of any SARA listed species.
Endangered Species Act, 2007	<ul style="list-style-type: none"> Our Species at Risk review of the NHIC 1km squares, Ontario Reptile & Amphibian Atlas, Ontario Breeding Bird Atlas, and Atlas of the Mammals of Ontario, determined that habitat for several Species at Risk is likely to occur within the proposed expansion area and adjacent lands. This list includes the following species with regulated habitat protection: Eastern Meadowlark (NHIC) Bobolink (NHIC) Blanding's Turtle (ORAA) Jefferson's Salamander (ORAA) Bank Swallow (OBBA) <p>Species at risk should be considered to ensure compliance with the ESA should any Natural features, trees or buildings be removed.</p>	Candidate habitat is present, and surveys should be conducted to confirm presence/absence of SAR species with candidate habitat.
Provincial Policy Statement, 2020	<ul style="list-style-type: none"> The MNRF Natural Heritage System mapping and the Wellington County Draft Natural Heritage System mapping includes the proposed Pit Expansion lands. The wetland and woodland are identified as a Deer Wintering Area (Stratum 2), which requires discussion with the MNRF to determine requirements. Species of Special Concern and rare species were identified in our background review, and due consideration for these species and 	Significant woodlands, significant wetlands, candidate significant wildlife habitat and surface water features are present in the study area and should be studied and considered.

	their habitat should be considered under Significant Wildlife Habitat.	
A Place to Grow, Growth Plan for the Greater Golden Horseshoe, 2020	The site is within the boundaries of the Growth Plan for the Greater Golden Horseshoe and include lands within the Natural Heritage System identified as Key Hydrologic Features. Key Hydrologic Features are described as the following: <i>Permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs, and wetlands.</i>	Lands identified as Key Hydrologic Features are present in the study area and should be studied and considered.
Ontario Regulation 150/06	GRCA regulated habitat is present within the proposed extraction area and adjacent lands, including Floodplain, the Mill Creek Puslinch Provincially Significant Wetland, and Mill Creek.	Studies to determine impacts to wetlands, surface water, and hazard lands are required.
Wellington County OP, June 2022 Consolidation	The Wellington County Official Plan Schedule A7 identifies that the entirety of the site is Core Greenland and Greenland, including hazard lands throughout most of the site.	Studies to determine impacts to hazard lands, Core Greenland, Greenland, quality and quantity of surface and groundwater, are required.
Township of Puslinch Comprehensive Zoning By - Law No. 023-18	Per the Township of Puslinch Zoning By-law, the subject property is within lands designated as Environmental Protection Overlay and Natural Environment with a small area of Agriculture.	Development within the Environmental Protection Zone overlay is not permitted unless it has been demonstrated to the satisfaction of the township that there will be no negative impacts on the habitat or ecological function of the natural heritage feature. Studies to identify all natural heritage features and determine appropriate setbacks and mitigation are required.

In conclusion, as identified in our 2021 review of the pre-submission documents and background information, we have determined that significant natural heritage resources and the potential for significant negative impacts to sensitive resources are present within and adjacent to the proposed development, based on the scale and expected impacts of the proposed development.

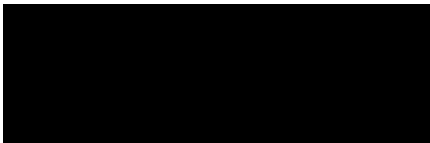
A meeting to discuss the proposal occurred on July 27, 2023, which included a review of planning, natural heritage and hydrological concerns related to the project. Per the results of the discussion, a revised ToR is to be submitted in response to the previous ToR review provided to the Township in 2021. We would like to ensure the following studies continue to be included in the natural heritage and hydrological studies:

- feature based water balance assessment of the wetlands present on/adjacent to site (TRCA wetland water balance risk evaluation (2017), or equivalent), discussion of impacts to the wetland due to any proposed changes to the quality or quantity of water should be included in the report,
- Review the Mill Creek Subwatershed study, determine if any additional requirements are identified,
- Headwater drainage feature assessment (TRCA, 2014 guideline),
- Breeding bird survey,
- Herptile surveys (including Salamander visual egg mass surveys of any present vernal pools, amphibian call count surveys, and visual surveys for snakes and turtles (following the MNRF Blanding's Turtle protocols),
- 3 season botanical study,
- Ecological Land Classification,
- Woodland dripline survey,
- Updated Wetland Limit survey and confirmation with GRCA,
- Species at Risk Habitat Assessment, (including species specific surveys for any species with candidate habitat on site),
- Significant Wildlife Habitat Assessment,
- Linkage and connectivity assessment,
- Aquatic Habitat Assessment,
- Fish community sampling,
- Pre, during and post development comprehensive monitoring plan, which includes adaptive management and appropriate triggers for additional investigation,
- Restoration plan, and buffer enhancement/planting plan.

A revised Terms of Reference should be provided prior to submission of the Natural Heritage Study. Please contact the undersigned should you require additional information or discussion of the above.

Yours truly,

ABOUD & ASSOCIATES INC.



Cheryl-Anne Ross, B. Sc. F.W.T.
Ecology Lead & Wildlife Ecologist



August 24, 2023

Memorandum

To: Lynne Banks - Development and Legislative Coordinator, Township of Puslinch

Cc: Meghan Ferris - Manager of Planning and Environment, Wellington County

From: Kim Funk - Source Protection Coordinator, Wellington Source Water Protection

Reviewed by: Kyle Davis - Risk Management Official, Wellington Source Water Protection

RE: 6947 Concession 2, Township of Puslinch – Pre-consultation

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. Pursuant to the *Clean Water Act*, there is no Notice required for this proposal.

Based on our review of the submitted documents, WSWP requests the following information be submitted as part of the mandatory pre-consultation process:

1. That the owners or their agents submit the following plans, reports and/or documentation to the satisfaction of the Township Risk Management Official:
 - Documentation of any Provincial Approvals (ECA, PTTW, ARA etc.) or applications for approval subject to the proposal;
 - Documentation of the decommissioning of on-site water wells not in use in accordance with *Ontario Regulation 903*;
 - Documentation of any transport pathway proposed for the development.
 - Circulation of hydrogeological, water resources, geological characterization and groundwater modelling reports
2. It is understood that the applicant has developed a groundwater model based on the City of Guelph Tier 3 model, further discussion may be required, once the modelling report is submitted, with the applicant, the Township's Hydrogeologist, Wellington Source Water Protection and the City of Guelph to understand the modelling completed and how it relates to the current Tier3 model and future updates. We expect this discussion should occur during the mandatory pre-consultation process for the *Planning Act* applications or during the public consultation for the ARA approvals.

The property is not located within a Wellhead Protection Area (WHPA) for quality or quantity but is located within a Significant Groundwater Recharge Area (SGRA). In addition, the majority of the property is in an area with a medium Intrinsic Vulnerability score. There are no applicable Source



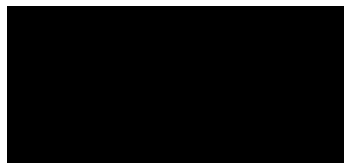
Protection Plan policies regarding SGRAs in the Grand River Source Protection Plan. Therefore, consideration, and if necessary, protection of the SGRA and the recharge function, is subject to the *Planning Act*. The Provincial Policy Statement (PPS) restricts development in or near sensitive groundwater features. The definition of development in the PPS includes “change of use”. Section 6.6.9 of the Wellington County Official Plan states that extraction below the water table only be allowed if impacts on the quality and quantity of water are minimal. It is recommended that impacts to the SGRA be considered in the approval of this Licence. It is requested that the Township hydrogeologist comment on this proposal, as it relates to how recharge could be affected in an area of significantly higher recharge.

Although the property is located outside of a quantity WHPA (WHPA-Q), it is located within 500m of the City of Guelph draft WHPA-Q with a significant risk level. Additional water taking occurring at the property or changes to the Permit To Take Water applications at nearby properties may impact the delineation of the WHPA-Q. If the boundary of the WHPA-Q is adjusted and encompasses the subject property, Source Protection Plan policies will apply including policies applicable to Aggregate Resources Act applications (ARA).

WSWP will continue to review subsequent applications for this file, including Aggregate Resources Act applications, and provide support to Township staff and consultants.

For more information, please contact the undersigned.

Sincerely,



August 24, 2023

Kim Funk, Source Protection Coordinator
519-846-9691 ext 283
kfunk@centrewellington.ca



Aug 24, 2023

Kyle Davis, Risk Management Official
519-846-9691 ext 283

Township of Puslinch
c/o Wellington Source Water Protection
Risk Management Office, 1 MacDonald Square, Elora, ON. NOB 1S0
1-844-383-9800 sourcewater@centrewellington.ca wellingtonwater.ca



kdavis@centrewellington.ca

Attachments: Drinking Water Threats Screening Form
WHPA Maps

Source_Protection_Comments_Concession2_6947

Final Audit Report

2023-08-24

Created:	2023-08-24
By:	Kim Funk (kfunk@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7rL3JbsCk5beLPW5WH3Gtea3qIZnFtlm

"Source_Protection_Comments_Concession2_6947" History

-  Document created by Kim Funk (kfunk@centrewellington.ca)
2023-08-24 - 3:24:02 PM GMT
-  Document emailed to Kyle Davis (KDavis@centrewellington.ca) for signature
2023-08-24 - 3:25:28 PM GMT
-  Email viewed by Kyle Davis (KDavis@centrewellington.ca)
2023-08-24 - 6:01:10 PM GMT
-  Document e-signed by Kyle Davis (KDavis@centrewellington.ca)
Signature Date: 2023-08-24 - 6:01:57 PM GMT - Time Source: server
-  Agreement completed.
2023-08-24 - 6:01:57 PM GMT

Drinking Water Source Protection Screening Form

Office Use Only

Roll Number: _____

File Number: _____

Submission Date: _____

WHPA, IPZ, ICA: _____

Vulnerability Score: _____

Find out if you live in a vulnerable drinking water area at www.wellingtonwater.ca

For assistance in completing this form, please refer to the “Explanatory Guide” beginning on page 6.

Please note that you may still need to contact the applicable Conservation Authority, as this is not considered correspondence on their behalf.

1. Property Information

Municipal Address of Subject Property: _____

Assessment Roll Number of Subject Property: _____

Property Owner: _____

2. Proposal (Please check all that apply to this application):

Building	
<input type="checkbox"/>	New Structure
<input type="checkbox"/>	Expansion or Conversion of an Existing Structure
<input type="checkbox"/>	New Septic System
<input type="checkbox"/>	Replacement Septic System
<input type="checkbox"/>	Geothermal System (Transport Pathway)
<input type="checkbox"/>	Change of Use

Planning	
<input type="checkbox"/>	Minor Variance
<input type="checkbox"/>	Official Plan Amendment
<input type="checkbox"/>	Consent Application
<input type="checkbox"/>	Zoning By-law Amendment Application
<input type="checkbox"/>	Subdivision/Condominium Application
<input type="checkbox"/>	Site Plan Application

Brief Description of the Proposed Use of Land, Proposed Buildings or Structures. If constructing a geothermal, please provide construction details including depth, vertical or horizontal, closed loop or open loop.

3. Potential Threat Activities Associated with the Application

Please check all applicable activities that may be associated with the development proposal:

3.1 Fuel Handling and Storage greater than 250 litres

	Existing	Proposed	Greater than 2,500L	Underground Storage Tank	Aboveground Storage Tank	Inside Home	Outside Home
Liquid Fuel (i.e. gasoline or diesel)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Fuel oil (home heating)	<input type="radio"/>	<input type="radio"/>					<input type="radio"/>
Waste oil (heating)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		

3.2 Chemical Handling and Storage

		If Yes, please indicate the type(s) of chemicals if known:		If Yes, please estimate the total amount
		3.2.1 Dense Non-Aqueous Phase Liquids (DNAPLs), including chlorinated solvents	3.2.2 Organic Solvents	
Paints and other coatings (including stains, enamels, lacquers, rust paint)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Dry cleaning chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Automotive repair/maintenance and/or industrial manufacturing and processing (e.g. degreasers, automotive fluids, oils, furniture stripping products, chemical solvents, adhesives)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Solvent based degreasers or liquids for washing metal parts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

3.3 Road Salt Application and/or Outdoor Storage

	Covered	Uncovered	Estimated Volume Stored on Property (m ³)	Estimated Application Area (m ²) including private roads, parking lots, and sidewalks
Road Salt Storage	<input type="radio"/>	<input type="radio"/>		
Road salt application (private roads, parking lots, sidewalks, etc.)				

3.4 Snow Storage (see guide)

	Above Grade	Below Grade (buried)	Approximate Storage Area greater than:		
			0.01 ha (double driveway)	0.5 ha (1 soccer field)	1 ha (2 soccer fields)
Snow Storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.5 Waste Storage or Disposal (see guide)

	Yes
3.5.1 Storage and/or application of raw, untreated liquids and solids that are pumped out of septic systems and holding tanks (not including septic tanks)	<input type="radio"/>
3.5.2 Storage and/or disposal of oils (does not include restaurant oil or grease); hazardous waste; liquid industrial waste; industrial and commercial waste; or PCB waste	<input type="radio"/>

3.6 Storm Water Management/Industrial Sewage

	Yes
Stormwater management facility (treatment, retention, infiltration, recharge or control of stormwater)	<input type="radio"/>
Car or truck washing facility	<input type="radio"/>
Oil and Water Separator	<input type="radio"/>
Sediment control (i.e. Stormceptor)	<input type="radio"/>

3.7 Septic Systems

	Existing	Proposed	
		New	Replacement
Septic system for residential or small-scale commercial/industrial/institutional use (Ontario Building Code)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Septic system (Greater than 10,000 litres per day) for commercial/industrial/institutional use (note an Environmental Compliance Approval would be required)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.8 Water Taking

	Proposed	Existing	If Existing, please provide the following:			
			Drilled	Dug	Well Not In Use*	Approx. Construction Date
3.8.1 Private Well (<i>*Please note that if there is an existing well that is not in use, Section 3.9 must also be checked</i>)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
3.8.2 Greater than 50,000 litres per day of water being used (note a Permit to Take Water may be required)	<input type="radio"/>	<input type="radio"/>				

3.9 Transport Pathway (see guide)

	Yes
Creation of aggregate pits, geothermal systems, non-residential or large residential caissons/building piers, or utilities/excavation within fractured bedrock and underground parking garages	<input type="radio"/>
Existing private well not in use	<input type="radio"/>

3.10 Recharge Reduction

	Yes
Creation of impervious surfaces (including large roofed areas, pavement, etc.) – only applies within Town of Erin	<input type="radio"/>

3.11 Agricultural

	Application	Storage	Product Name(s)
3.11.1 Fertilizers	<input type="radio"/>	<input type="radio"/>	
3.11.2 Pesticides	<input type="radio"/>	<input type="radio"/>	
3.11.3 Agricultural source material (i.e. manure)	<input type="radio"/>	<input type="radio"/>	
3.11.4 Non-agricultural source material (i.e. biosolids, commercial food wastes, etc.)	<input type="radio"/>	<input type="radio"/>	

	Yes	Estimated Number of Animals	Type of Animals
3.11.5 Grazing and Pasturing of livestock	<input type="radio"/>		
3.11.6 Outdoor Confinement Yard	<input type="radio"/>		
3.11.7 Nutrient Management Plan or Strategy, NASM Plan applies to or is registered for the property	<input type="radio"/>		
Environmental Farm Plan	<input type="radio"/>		

3.12 None of the above are applicable

Check off this box only if none of the above sections have been checked	<input type="radio"/>
---	-----------------------

4. Declaration (Owner or Applicant) or Person Engaged in Activity

Owner

I, _____, declare that the information contained in this application and all attached documentation is true to the best of my knowledge.

Date

Signature

Applicant or Authorized Agent

I, _____, declare that the information contained in this application and all attached documentation is true to the best of my knowledge.

Date

Signature

Information is collected pursuant to the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56 and the *Clean Water Act*, 2006, S.O. 2006, c. 22 for the administration and enforcement of the *Clean Water Act*. Please note that business identity information is not considered personal information pursuant to the *Municipal Freedom of Information and Protection of Privacy Act*.

For any inquiries about the collection of this information, please contact the Risk Management Official, Wellington Source Water Protection, 7444 Wellington Road 21, Elora, ON, N0B 1S0, 519-846-9691 ext. 362.

Explanatory Guide for Completing the Drinking Water Source Protection Screening Form

Your property is located within a municipal well head protection area or intake protection zone and therefore may be subject to the *Clean Water Act*, 2006. The Wellhead Protection Area (WHPA) is the area around a municipal well where land use activities have the potential to affect the quality and quantity of water that flows into the wellhead. For more information, refer to www.wellingtonwater.ca or contact 1-844-383-9800.

To assist staff in determining whether your property and/or application is subject to the Act, the Drinking Water Source Protection Screening Form is completed to inventory the activities that are proposed on your property. The following sections explain the form.

Section 1 – Property Information:

Please fill out the municipal address and property owner for the subject property.

Section 2 – Proposal:

Please check all that apply to the application and provide a brief explanation of the proposed development and/or construction details if construction a geothermal (such as depth, vertical r horizontal, closed loop or open loop).

Section 3 – Potential Threat Activities Associated with Proposed Application:

Within this section please fill out all that apply to your application. If there is a circle provided in the table, please provide a check mark; if there is a blank space in the table please write in the applicable information.

3.1 Liquid Fuel Handling and Storage:

Fill out this section if on the property there is liquid fuel storage or handling greater than 250 litres (1 gal = 3.785 L). This can be located in land uses for residential, agricultural, gas, commercial, industrial or institutional purposes and includes gasoline, diesel or home heating oil. It does not include propane or natural gas.

3.2 Chemical Handling and Storage:

Fill out this section if the application is regarding one of the listed chemical handling or storage activities on the form.

3.2.1 Known DNAPLs:

Fill out this section only if applicant is aware of a Dense Non-Aqueous Phase Liquid (DNAPLS) on the property. DNAPLs are chemicals that are denser than water and therefore have the ability to contaminate the groundwater easily. The specific DNAPLs that pose a potential threat are poly-aromatic hydrocarbons (PAHs), 1, 4-dioxane, trichloroethylene, tetrachloroethylene or perchloroethylene (PCE or PERC) and Vinyl Chloride.

- **Vinyl Chloride:** Used to make polyvinyl chloride (PVC) pipes, wire coatings, vehicle upholstery and plastic kitchen ware
- **PAHs:** Used in wood preservatives, pharmaceuticals, dyes and asphalt products.

- **1,4-dioxane:** Used as a degreasing solvent or solvent stabilizer in various manufacturing processes.
- **Tetrachloroethylene** (PCE or PERC): Used in dry cleaning, metal cleaning and as an intermediate in manufacturing processes.
- **Trichloroethylene** (TCE): Mainly used for degreasing of metal parts in the automotive and metal industries and also found in some household products such as adhesives, paint removers, paints, rug cleaning fluids, and metal cleaners.

3.2.2 Known Organic Solvents:

Fill out this section if the applicant is aware of Organic Solvents on the property. Organic Solvents are liquid organic compounds with the ability to dissolve solid, gases or liquids and therefore have the ability to contaminate drinking water sources. Organic Solvents that are of potential concern include Carbon Tetrachloride, Chloroform, Dichloromethane and Pentachlorophenol (PCP).

- **Carbon Tetrachloride:** Once used widely in fire extinguishers, as a cleaning agent, in the manufacture of refrigerants as well as an industrial solvent and metal degreasing agent is a banned substance in Ontario since 1999. The only permitted uses of the chemical are in research laboratories or in the manufacturing process where the product is converted to an alternative product which does not contain a class of ozone-depleting substances.
- **Chloroform:** commonly used in a laboratory setting, and in the production of pharmaceuticals, dyes and pesticides.
- **Dichloromethane** (also known as methylene chloride): used as a solvent in paint strippers and removers. It is used as a process solvent in the manufacture of drugs, pharmaceuticals and film coatings. It is also used as a metal cleaning and finishing solvent in electronics manufacturing, aerosol propellant and as an agent in urethane foam blowing.
- **Pentachlorophenol** (PCP): used as an herbicide, insecticide, fungicide, algicide and disinfectant, and as an ingredient in antifouling paint. Its use has significantly declined due to its high toxicity. Today it is used industrially as a wood preservative and is not manufactured in Canada.

3.3 Road Salt Application, Handling and Storage:

Fill out this section if there will be road salt storage on the property or road salt application on a private road, parking lot, or sidewalk located on the property. Please provide estimates in m³ for volume and m² for area.

3.4 Snow Storage:

Fill out this section if there will be snow storage (above or below grade) on the property and indicate whether the storage will be greater than 0.01 hectare (0.03 acre or 10 metres by 10 metres), greater than 0.5 hectares (1.24 acres or 50 metres by 50 metres), or greater than 1 hectare (2.5 acres or 100 metres by 100 metres). For reference, 0.01 hectare is roughly the size of a double driveway, 0.5 hectares is roughly the size of one soccer field, and 1 hectare is roughly the size of two soccer fields.

3.5.1 Waste Storage or Disposal - Septic Tank Pump outs

Fill out this section only if application is involved in the pumping out or disposal/treatment of raw sewage or septage, porta potties or holding tanks.

3.5.2 Waste Storage or Disposal - Storage and/or Disposal of Hazardous Waste:

Fill out this section if there is hazardous waste or liquid industrial waste stored on the property including waste oil, solvents, and automotive fluids. Please note storage or disposal of oil does not include restaurant oil or grease. Storage of hazardous waste or liquid industrial waste includes wastes requiring registration with the Ontario Hazardous Waste Information Network (HWIN), if applicable. Disposal of waste on site includes landfilling and incineration. Typically, this will only be at commercial or industrial properties.

3.6 Storm Water Management/Industrial Sewage:

Fill out this section if one of the listed storm water management or industrial sewage activities is planned or present. For reference, a storm water management facility may include a retention or detention pond (wet or dry), catch basins, sediment control, recharge systems (such as infiltration galleries), swales and ditches.

3.7 Septic Systems:

Fill out this section if the property will be serviced by a septic system. Please indicate whether the septic system is existing or proposed. If the existing or proposed septic system has a design capacity of less than 10,000 litres, it is regulated under the Ontario Building Code (OBC). A building permit, obtained through the municipality, is required by the OBC for installation of a new septic system and for the repair/replacement of an existing system. If the existing or proposed septic system has a design capacity of greater than 10,000 litres a day, a provincial Environmental Compliance Approval may be required under the Ontario Water Resources Act. Please contact the local Ontario Ministry of the Environment and Climate Change office for more information.

3.8.1 Water Taking - Private well installed:

Fill out this section if there is an existing well present or a new well being installed on the property. This includes private drinking water wells, environmental test wells, geotechnical wells, irrigation wells, etc. Please indicate whether the well is proposed or existing, and fill out the rest of the section (dug or drilled as well as the approximate construction date) for existing wells only.

3.8.2 Water Taking - Greater than 50,000 litres per day

Fill out this section if more than 50,000 litres per day is being withdrawn from a well or a water body (1 gal = 3.785 gal).

3.9 Transport Pathway

Transport pathways are human constructed pathways through soil and bedrock that may increase the vulnerability of groundwater to certain contaminants.

Please check the first circle if your application will be installing a vertical geothermal system, installation of caissons or building piers for a non-residential application or for a large residential application, aggregate project, or installation of utilities or excavation within fractured bedrock. A road occupancy permit application could indicate when fracture bedrock excavation occurs. If geothermal, please provide construction details including depth, vertical or horizontal, closed loop or open loop in the space provided in Part 2 (on the first page of this document). A large residential application includes multi-story, multi-unit residential developments.

Please check the second circle if there is an existing private well that is not in use. Private wells include environmental and / or geotechnical monitoring wells and domestic wells. If you filled out Section 3.8.1 as private well not in use, Section 3.9 should also be completed.

3.10 Recharge Reduction:

Fill out this section if there is going to be an increase in impervious surfaces on the property. For example, asphalt (driveways and parking areas) and covered areas (roofs, decks and structures). If building within current building envelope then it is not an increase. Please note this box only applies within the Town of Erin.

3.11.1 Fertilizers and/or 3.11.2 Pesticides:

Fill out this if there is storage or use of fertilizer or pesticides for agricultural or commercial use. Do not fill out this section if used only for personal use.

3.11.3 Agricultural - Application, handling and storage of agricultural (i.e. manure) and/or 3.11.4 non-agricultural source material (bio solids):

Fill out this section if there is application, handling or storage of Agricultural Source Material (ASM) (manure) or Non-Agricultural Source Material (NASM) on the property. ASM and NASMs include; manure (ASM) and biosolids, commercial food waste, etc. For more information on NASMs and ASMs please look at fact sheet number 4, available on our website, www.wellingtonwater.ca

3.11.5 Agricultural - Grazing and pasturing of livestock:

Fill out this section if there is any grazing, pasturing or housing of one or more livestock on the property excluding household pets. Livestock can include cows, horses, sheep, goats and other animals. If unsure, please contact Wellington Source Water Protection for clarification. Please give an estimation of the number of animals, as well as the type of animal(s).

3.11.6 Outdoor Confinement Yard:

Fill out this section if there are any livestock including cows, horses, sheep, goats and other animals housed in an outdoor confinement yard on the property. If unsure, please contact Wellington Source Water Protection for clarification. Please give an estimation of the number of animals, as well as the type of animal(s).

3.11.7 Prescribed Instruments

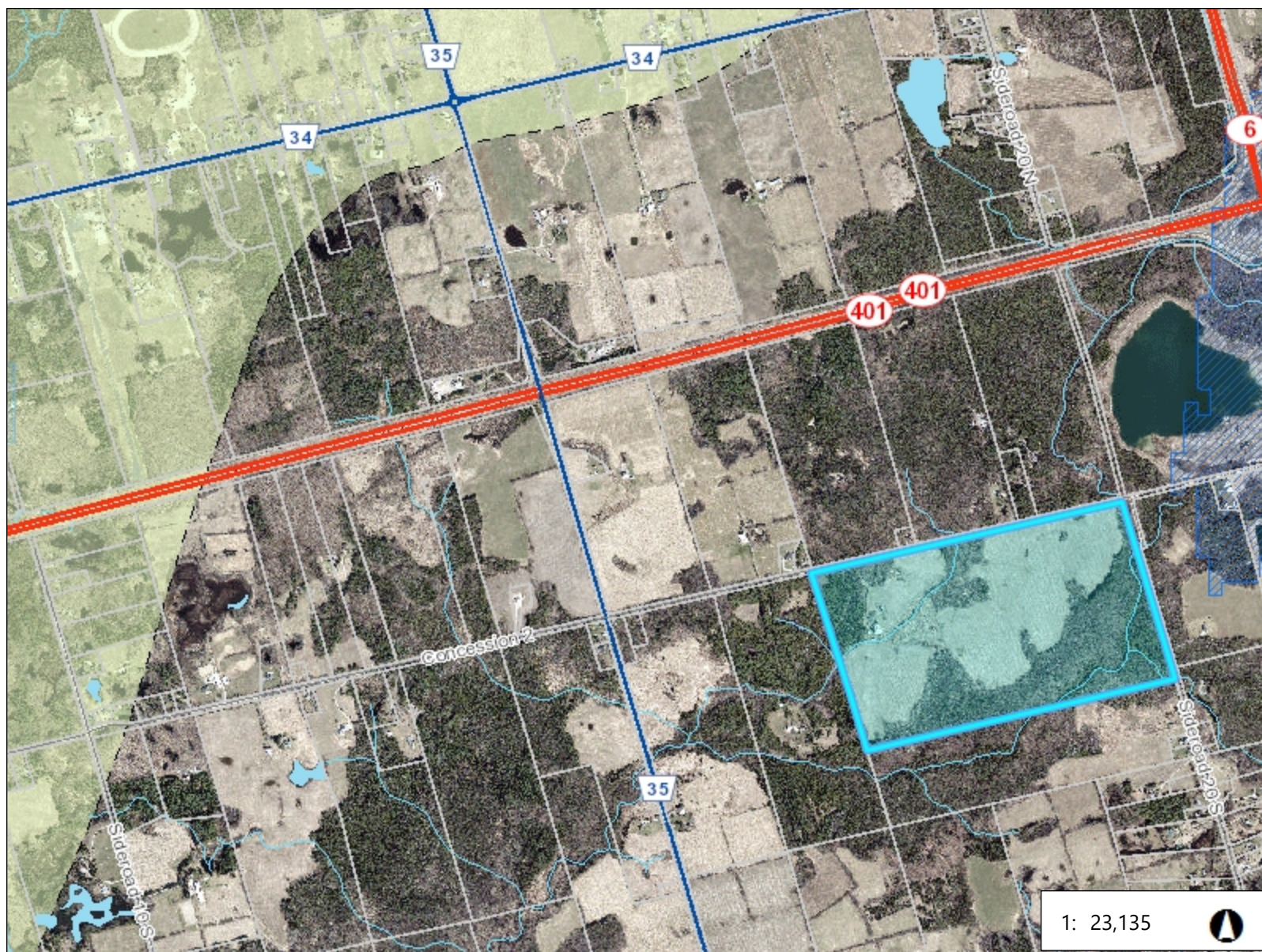
Fill out this section if there are any provincially prescribed instruments that apply to or are registered for the property. This includes Nutrient Management Strategies, Nutrient Management Plans and Non-Agricultural Source Material Plans.

3.12 None of the above are applicable:

Check that none of the above sections in Part 3 are applicable to the application. This section should only be checked if none of the other sections have been checked.

Section 4 - Declaration:

Either the owner or the applicant must sign and date the form.

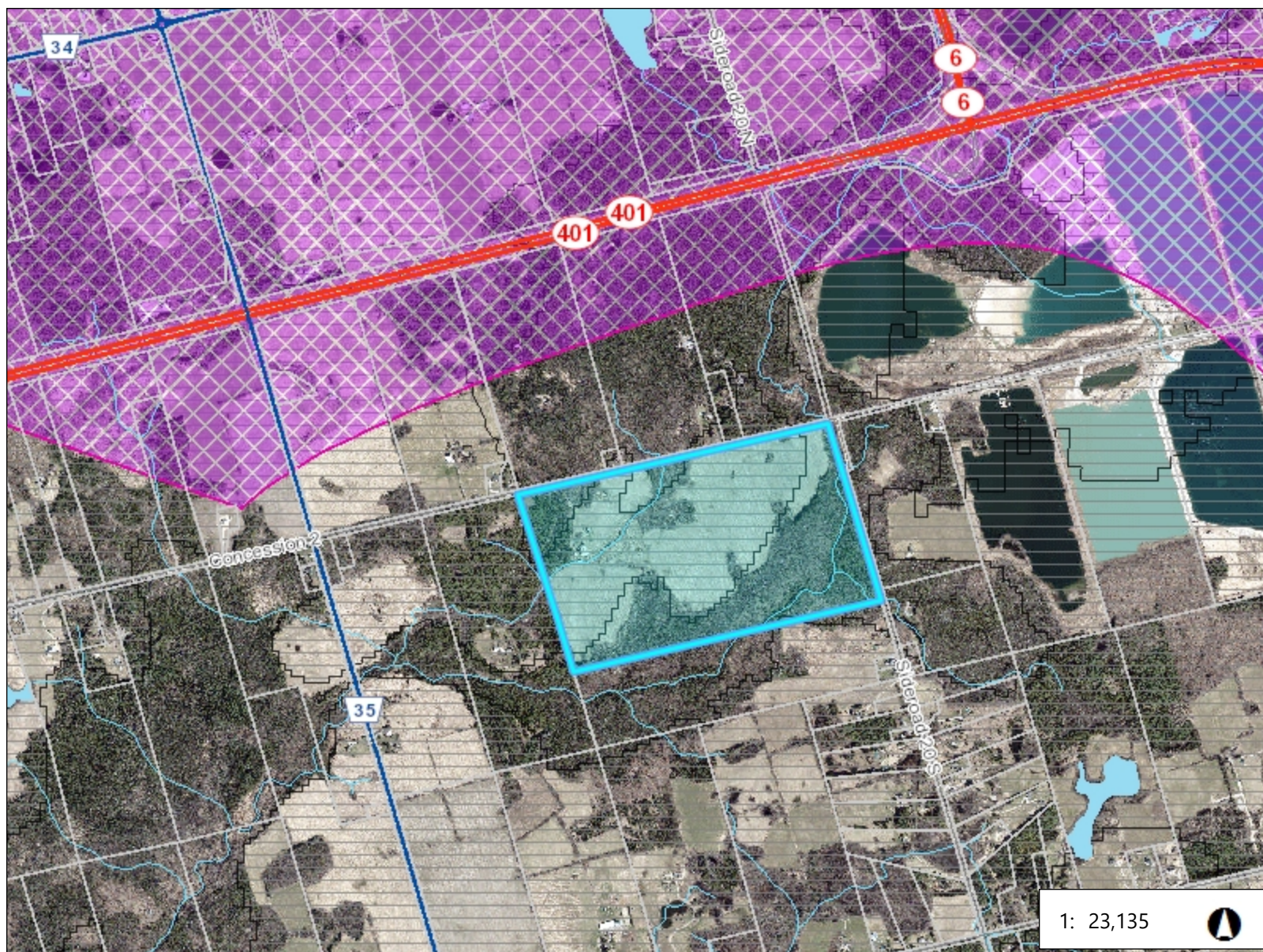


Legend

- Parcels
- Roads - Small Scale**
 - Local Road
 - County Road
 - Highway
- Waterbodies
- Watercourses
- Well Locations**
 - Existing
 - Proposed
- Issue Contributing Area**
 - Chloride
 - Nitrate
 - Sodium
 - TCE
- Wellhead Protection Area**
 - A
 - B
 - C
 - D
- Vulnerability Score**
 - 10
 - 8, D; 8; 8, C
 - 2, 4, 6 (A, B or C)
 - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA

1.2 0 0.59 1.2 Kilometers

Notes



Legend

- Parcels
- Roads - Small Scale
 - Local Road
 - County Road
 - Highway
- Waterbodies
- Watercourses
- Well Locations
 - Existing
 - Proposed
- WHPA Q1_Q2_Boundary
 - Approved
 - Draft
- SGRA
- RoadsLookup

1.2 0 0.59 1.2 Kilometers

Notes



To: Township of Puslinch/County of Wellington
From: Fred Natolochny Grand River Conservation Authority
cc. Neal DeRuyter, MHBC
Date: September 28, 2021
Re: CBM Aberfoyle South Pit pre-consultation comments

Comments:

- The site contains Mill Creek and a wetland to the south, and an unnamed tributary to Mill Creek and wetlands to the north and northwest of the proposed extraction area. Mill Creek is a cold water system with sensitive cold water fish community. This site contains both brook trout and brown trout with confirmed spawning areas on the subject lands. Baseline habitat and fish community assessments would be required. The Mill Creek Subwatershed Study should be referenced for studies background. Site contains portions of Mill Creek Provincially Significant Wetland Complex. The wetland/woodland is zoned Core Greenlands in Official Plan. Floodplain covers the majority of the site. Terms of reference/study outlines are requested for the technical reports to be prepared.
- Almost the entirety of the planned excavation extent is in the floodplain. The proponent should determine what impact (if any) the proposed site changes will have on flood elevations onsite, and upstream/downstream.
- Monitoring should be designed to assess the pre-extraction function of the wetlands and streams (groundwater versus surface water supported) and groundwater gradients on a seasonal basis. A detailed analysis should be provided as to how their function and gradients will be maintained both during and post extraction. Technical studies should demonstrate how the proposed development will protect and maintain the sites water balance and contributions to the wetland, woodlands, and watercourses through both surface and groundwater contributions.
- Monitoring and evaluation should also assess thermal impacts to wetlands/watercourses prior to (ie baseline), during, and post extraction.
- The additive impacts to Mill Creek and Provincially Significant Wetlands from below water table aggregate extraction (ie. Changes to groundwater flow and temperature) should be assessed in relation to other water takings and extraction operations in the area as identified in: Cumulative Effects Assessment (Water Quality and Quantity) Best Practices Paper for Below-Water Sand and Gravel Extraction Operations in Priority Subwatersheds in the Grand River Watershed September 2010

[Microsoft Word - CW-11-10-107 - Cumulative Effects Assessment for Below-Water Aggregate Operations, etc..docx \(grandriver.ca\)](#)

Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

October 25, 2023

Attn: Lynne Banks
Development and Legislative Coordinator
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON
N0B 2J0

**RE: Pre-Consultation for Proposed Pit Expansion
CBM Aberfoyle South Pit
6947 Concession Road 2
Township of Puslinch
County of Wellington**

Dear Ms. Banks:

Stovel and Associates Inc. (SAI) has reviewed the submission materials provided by the applicant's consultant, MHBC Planning Limited ("MHBC"). The documentation package included the following:

- Figure No. 1, Context Plan, prepared by MHBC, date October 2022.
- Figure No. 2, Proposed Haul Route, prepared by MHBC, date January 2022.
- CBM Aberfoyle South Pit Expansion Application Update and Related Plans (Existing Features and Rehabilitation Plan), prepared by MHBC, dated July 26, 2023.

It is understood that the County of Wellington has prepared a letter to the Township of Puslinch (Correspondence from M. Ferris to L. Banks, September 8, 2023). We have tried to minimize the overlap between our comments and the County's comments.

Planning Applications and Site Plan (ARA)

The planning applications and Site Plan under the Aggregate Resources Act (ARA) should be based on a Legal Plan of Survey (OLS). Given the irregular shape of the proposed Licence and Extraction limits, a legal survey is needed to ensure the accuracy of the Site Plan and the implementing planning documents (i.e., OPA/ZBA).

There is a portion of the site, in the northwest corner, that is included in the Licence limits but not in the Extraction limits. The rationale for including this area needs to be explained in the Planning Justification Report/Summary Statement ("PJR"). Given the proximity of this area to adjacent natural heritage features, the inclusion of this area should be

evaluated by the ecological consultant. A potential concern is that the area could be extracted in the future, via a site plan amendment.

As part of the submission to the Township, the applicant should provide a copy of the deed and, if relevant, a copy of the agreement with the landowner to permit extraction at the site.

Archaeology

It is noted that three archaeological resource features are shown within the Licence Limits and two of these archaeological resources are shown within the proposed Extraction Limits of the Site Plan. I understand that Stage 3 investigations have been completed. Should additional studies be required, the timing of these additional studies should be documented in the submission. The PJR will need to address the rationale for including known archaeological resources within the proposed Extraction Limits of the pit.

Quality and Quantity of Aggregate Resources

The volume of aggregate resources and the quality of aggregate resources need to be documented in the submission. Copies of test pit logs, gradations, and laboratory analysis (physical properties) should be included. The report should be prepared under the supervision of a P.Eng. or P.Geo. Of note, this assessment should address material specifications and volumes both above and below the established water table.

Consultation with Indigenous Communities

The applicant should include copies of correspondence with Indigenous Communities.

Agricultural Impact Assessment (AIA)

An AIA should be submitted with the application. The AIA would address the requirements of the County of Wellington Official Plan and the provincial guidelines for AIAs (draft). The AIA should also provide documentation of the volume of topsoil, subsoil and overburden available at the site. This information should be used to create a soils budget for the site development (i.e., soil to be used for the establishment of acoustic berms and visual barriers).

Documentation of Intent to Import Excess Soil, Aggregate/Concrete/Asphalt for Recycling and Re-use Purposes

The Site Plan and the PJR should note whether the following materials will be imported to the site: excess soil (to establish berms or enhance rehabilitation), aggregate for blending, concrete/asphalt for recycling and re-use. It is understood that the subject pit proposal is focused on the extraction of mineral aggregate resources for a related pit in the local area. Therefore, it is not anticipated that importation of any of these materials will be necessary. However, if these materials are proposed to be imported, the PJR should justify the need for these materials and the Traffic Impact Assessment should include the relevant truck trips for importation. The implementing zoning bylaw should also include provisions to ensure that these activities are of an interim nature and will

cease once the onsite materials have been depleted.

I trust that these comments are of assistance to the Township. Should you have any concerns or questions, please do not hesitate to contact me.

Yours truly,

A solid black rectangular box used to redact the signature of Robert P. Stovel.

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P. Ag.