



TECHNICAL MEMORANDUM

DATE October, 22, 2025

Project No. CA-GLD-1791470A

TO Andreanne Simard - Director of Lands, Resources and Environment
Stephen May - Lands Manager, Western Region
CBM Aggregates

CC Craig DeVito, Warren Aken, Daniel Eusebi - WSP; Neal DeRuyter - MHBC

FROM George Schneider, Paul Menkvel

EMAIL george.schneider@wsp.com

RESPONSES TO STOVEL AND ASSOCIATES INC. REVIEW COMMENTS – PROPOSED CBM ABERFOYLE SOUTH LAKE PIT

The table below provides WSP's responses to review comments made by Stovel and Associates Inc. (Stovel) (Harden) on April 19, 2024 and received by MHBC Planning from the Township of Puslinch on April 29, 2024 related to the ARA licence application for the proposed CBM Aberfoyle South Lake Pit.

If you have any questions about the responses, please contact us at your earliest convenience.

WSP Canada Inc.

Paul Menkvel, M.Sc., P.Eng.
Hydrogeological Engineer

George Schneider, MSc, PGeo
Senior Geoscientist

PGM/GWS/CVD/rk

Distribution: Stephen May, Bill Marquardt - CBM Aggregates
Craig DeVito, Warren Aken, Daniel Eusebi - WSP; Neal DeRuyter - MHBC

Attachments: Table 1 – WSP Responses to Stovel / Township of Puslinch Review Comments
Figure 1 – Base of Resource Elevation
Attachment 1 - Flood Mapping – Proposed Aberfoyle South Lake Pit

[https://wsponline.sharepoint.com/sites/gld-21291g/deliverables/01_agency_comments/01_township_of_puslinch_\(objection_letter_and_9_sets_of_comments\)/06_stovel/final/1791470a-tm-rev0-cbm_aberfoyle_south_lake-stovel-responses_22oct2025.docx](https://wsponline.sharepoint.com/sites/gld-21291g/deliverables/01_agency_comments/01_township_of_puslinch_(objection_letter_and_9_sets_of_comments)/06_stovel/final/1791470a-tm-rev0-cbm_aberfoyle_south_lake-stovel-responses_22oct2025.docx)

TABLES

**Table 1 – WSP Responses to Stovel /
Township of Puslinch Review
Comments**

Table 1 – WSP Responses to Stovel Review Comments

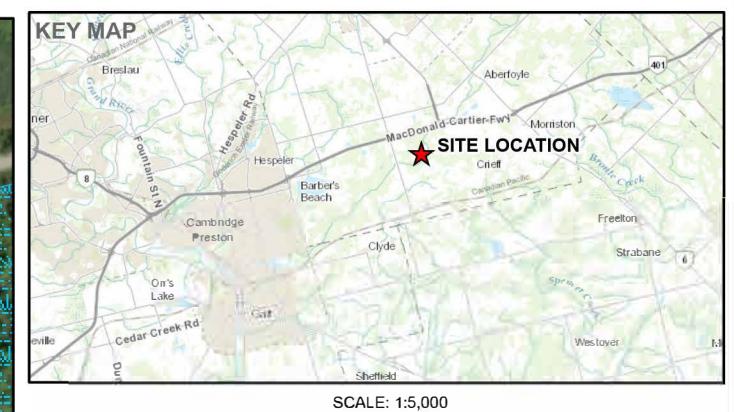
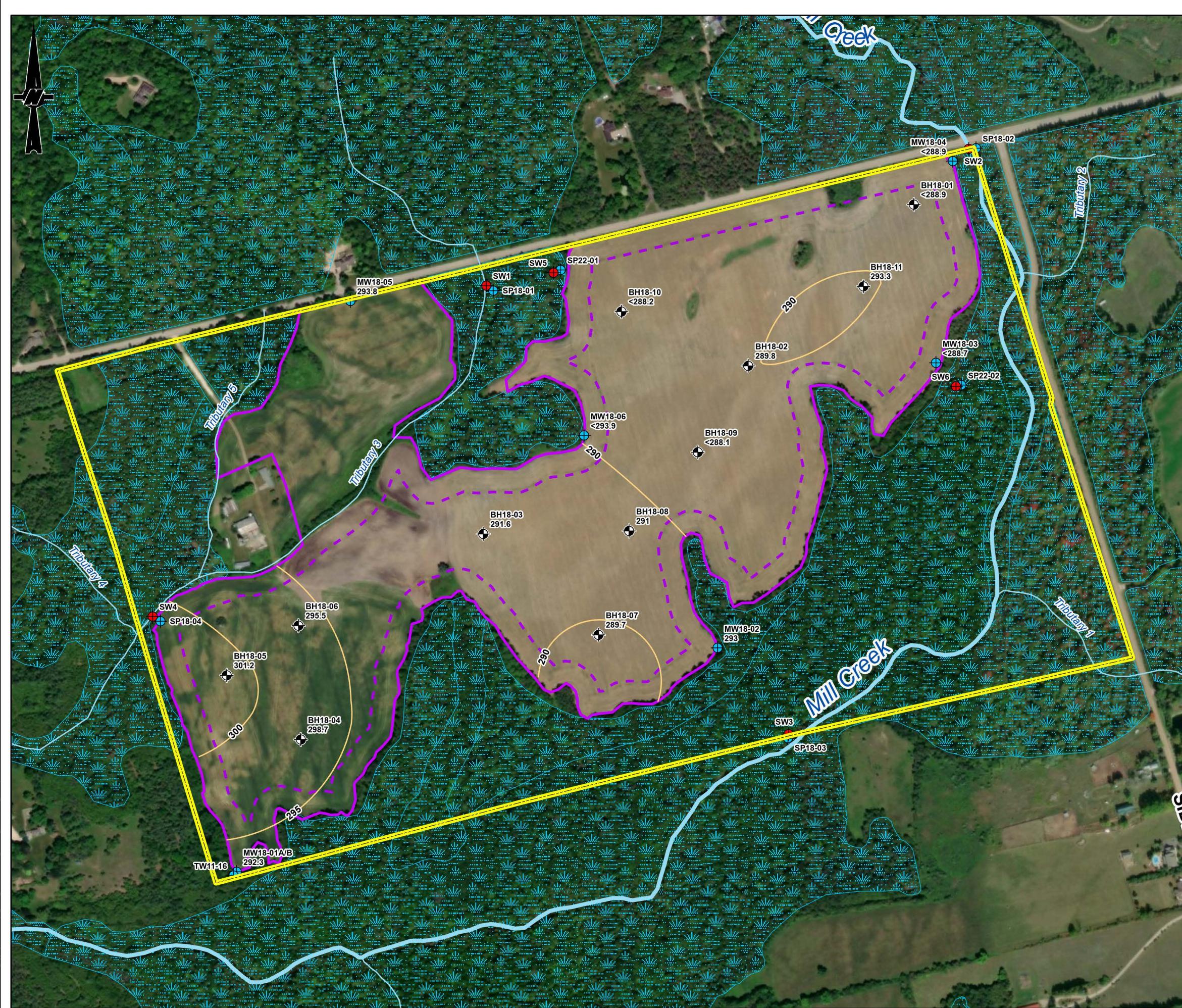
Num	Topic	Section	Stovel Comment	WSP Response
1	Water Rpt / Site Plan	General	The Site Plan illustrates water monitors located beyond the proposed licence limits. These monitors are referenced in the Hydrogeological Technical Recommendations. Monitors located beyond the proposed licence limits may need to be incorporated into a monitoring program implemented via a Development Agreement.	The monitoring stations shown on the Site Plans beyond the proposed licence limits are on lands owned by the Applicant. It is MNR's current practice that significant natural features that are not proposed to be extracted should be removed from licence boundaries. Monitoring often occurs with such natural features. CBM is aware of many examples of monitoring wells located outside licence limits which are still included and regulated under the ARA Site Plan.
2	Water Rpt / Site Plan	General	We have reviewed the comments from the Township's Ecological and Hydrogeological Peer Review consultants. Concerns were expressed related to the following (amongst others): <ul style="list-style-type: none"> • Are the setbacks next to natural heritage features sufficient? 	A 30 m setback is assigned to the natural heritage features at the site consistent with the buffers often recommended by the GRCA for Provincially Significant Wetlands. The buffer is suitable for the site conditions as the area is topographically flat and currently used for agricultural practices. The proposed buffer provides a better setback from current anthropogenic activities. As noted in the NETR, the buffer will be reforested as part of the rehabilitation plan, with seventy percent of the planted species being coniferous, which are effective at reducing anthropogenic noise. The setbacks are considered appropriate as they result in a vegetated buffer that provides increased protection for the wetland, compared to an unvegetated or sparsely vegetated buffer. The similarity in structure between Mill Creek-Puslinch PSW / significant woodland and the reforestation area will create a soft edge at the interface, which will ecologically improve the existing hard edge between the Mill Creek-Puslinch PSW/significant woodland and the adjacent agricultural crop field (MNR 2011b). The buffer also helps control sediment transport from the site into the feature, and 30 m is a well-documented industry standard supported by regulatory agencies, particularly on sites with observed topographically flat conditions. In addition, based on the impact assessment presented in the Water and Natural Environment reports, and supplemental information provided to the Township's Peer Review consultants, the setbacks proposed to natural heritage features are sufficient.

Num	Topic	Section	Stovel Comment	WSP Response
3	Water Rpt / Site Plan	General	• Should berms be located close to adjacent natural heritage features?	The rehabilitation plan has been updated to adjust grading along the edge of the pit pond to control flood waters, as described in the revised Floodplain Assessment (see attached Technical Memorandum – Attachment #1) and on the updated Site Plans.
4	Water Rpt / Site Plan	General	• Is the depth of extraction justified given that boreholes were terminated 5 m above the proposed pit floor?	The proposed extraction plan for the Site recommends extraction to the base of the resource (where till is expected to be encountered) or to an elevation no lower than 285 masl. Observations of the base of resource elevation are presented on Figure 1 (attached). It is noted that the elevation of the base of the resource varies across the Site from 301 masl (at BH18-05) to below 288 masl (at BH18-09) and in places exceeds the depth of the test boreholes drilled. The proposed extraction approach is to limit the maximum depth of the extraction to the bottom of the sand and gravel / top of till. This approach will optimize the retrieval of resource along an irregular bottom surface and maintain a near undisturbed till layer beneath it.
5	Water Rpt / Site Plan	General	• Will the future pond overflow its banks and flood adjacent land and environmental features? A detailed topographic survey may be required to determine the existing elevations between the proposed extraction area and the adjacent natural heritage features. Modifications to the Site Plan may be required to address these types of concerns.	A more in-depth floodplain assessment has recently been completed (see Technical Memorandum, Attachment #1) to further evaluate the potential for flooding. Perimeter grading will be installed in the southwest corner of the property to address this concern and ensure floodplain elevations for the regional storm are maintained within the pit. Flood waters will be permitted to enter the pit at the northeast corner of the site.
6	Agg Resource Rpt / Site Plan	General	The Planning Report should address the need for imported fill/excess soil. Also, a volume estimate of existing soil resources that would be stripped from the proposed extraction area should be prepared. A soil budget that compares existing available soil resources versus soil needed for rehabilitation should be prepared. In general, given that the pit is to be extracted below the water table, there appears to be sufficient onsite resources available for rehabilitation and this proposed pit would not represent a good candidate for imported fill/excess soil and it is recommended that the notes related to the importation of fill/excess soil be removed from the Site Plan.	Please refer to MHBC's response to this comment.

Num	Topic	Section	Stovel Comment	WSP Response
7	Agg Resource Rpt / Site Plan	General	<p>An estimated volume of the mineral aggregate resource was provided by the applicant's consultant and summarized in the Planning Report. The volume calculations should be reviewed based on the proposed extraction plan, given that the depth of the proposed pit is to the elevation of 285 masl. This represents a 20 m depth of extraction; however, an extraction depth of 12.5 m was reported in the WSP Aggregate Resource Evaluation. It is recommended that the proposed pit floor depths be adjusted to an elevation that has been substantiated by borehole results and suggested by WSP.</p>	<p>See response to comment #4.</p> <p>Note that the Aggregate Resource Report does not recommend a 12.5 m extraction depth. Section 6 notes that an average thickness of the resource is 12.5 m, below a surficial layer up to 3 m thick, and that the estimate is limited by the depth of boreholes where the bottom of the resource was not encountered.</p>

FIGURES

**Figure 1 – Base of Resource
Elevation**



LEGEND

- RESOURCE EVALUATION BOREHOLE
- GROUNDWATER MONITOR
- SURFACE WATER MONITOR
- WATERCOURSE
- LICENSED BOUNDARY
- CONTOURS
- PROPOSED EXTRACTION AREA
- SITE BOUNDARY
- PROVINCIAL SIGNIFICANT WETLAND (EVALUATED)

9

0 60 120 180 240 320
1:5,000 METRES

CLIENT
CBM AGGREGATES, A DIVISION OF ST. MARYS CEMENT INC.
(CANADA)

CANADA
PROJECT
ABERFOYLE SOUTH LAKE PIT

TITLE

CONSULTANT	YYYY-MM-DD	2025-04-10
	DESIGNED	SO
	PREPARED	AP
	REVIEWED	GWS
	APPROVED	GWS
PROJECT NO.	CONTROL	REV.
CA GLD 1791470A	0001	0
		FIGURE
		1

ATTACHMENT 1

**Flood Mapping – Proposed
Aberfoyle South Lake Pit**



TECHNICAL MEMORANDUM

DATE August 12, 2025

Project No. 1791470A

TO David Hanratty
CBM Aggregates, a division of St. Mary's Cement Inc. (Canada)

CC George Schneider

FROM Mohsin Siddique; Craig DeVito

EMAIL craig.devito@wsp.com

FLOOD MAPPING – PROPOSED ABERFOYLE SOUTH LAKE PIT

1.0 INTRODUCTION

In November 2023, CBM Aggregates (CBM), a division of St. Marys Cement Inc. (Canada), submitted a Class A Pit Below Water licence application under the *Aggregate Resources Act (ARA)* at the proposed Aberfoyle South Lake Pit located at 6947 Concession Road 2, in the Township of Puslinch, County of Wellington, Ontario (referred herein as Property). WSP Canada Inc. (WSP), has been retained by CBM to complete an assessment of various return period event flood elevations from Mill Creek on the Property, as requested from the Grand River Conservation Authority (GRCA) during their review of the Terms of Reference for the ARA licence application.

The Property is approximately 85 hectares (ha) in size and is located at 6947 Concession Road 2, in the Township of Puslinch, County of Wellington, Ontario. Of this Property, approximately 44 ha are proposed for licensing under ARA (referred herein as Site) and the extraction area within the Site is approximately 27 ha in size (Figure 1.1). The Property is comprised of approximately 50% agricultural fields which are flanked by three wooded areas in the northwest, north-central and southeast portions of the Property and an unoccupied residence in the western portion of the Property (Figure 1.1).

The predominant surface water features in the vicinity of the Site include Mill Creek and its tributaries. Mill Creek flows from north to south along the eastern and southeastern portion of the property (Figure 1.1), exits the Property along the southern boundary, and then flows westward approximately 150 m to the south of the Property boundary. There are five small tributaries to Mill Creek proximal to the Property (Figure 1.1), referred to as Tributary 1, 2, 3, 4 and 5. Tributaries 1, 3 and 5 originate off-Property but then flow onto the Property and join Mill Creek, while Tributaries 2 and 4 are located entirely off-Property.

2.0 OBJECTIVE

The primary objective of this technical memorandum is to assess floodplains of Mill Creek and Tributary 3 and provide the results in terms of storm flood elevations and floodplain maps for 5-year, 10-year, 25-year, 50-year and 100-year storm floods, noting that considering the layout of Site and extraction area, and the overall drainage pattern, floodplains of Tributaries 1, and 5 were not assessed. Flood elevation data was not provided for a 2-year

storm flood, however typically a 2-year flood will be contained within the creek channel and will not overtop the top of channel and therefore not enter the site.

3.0 METHODOLOGY

To assess the floodplain of the study area, hydraulic modeling was conducted using HEC-RAS software (version 6.3.1). Two (2) one-dimensional steady flow HEC-RAS models: (1) Mill Creek and (2) Tributary 3, were used. The models of Mill Creek and Tributary 3 are based on GRCA's HEC-RAS models for the regional flood (provided by GRCA) and uses Canadian Geodetic Vertical Datum of 1928 (CGVD28) / North American Datum (NAD) of 1983 of the Canadian Spatial Reference System (NAD83(CSRS)). Note that for floodplain mapping, flood elevations were converted to CGVD2013 / NAD1983 using GPS.H tool (Government of Canada, 2024).

The calibration parameters and associated values in both models were assumed unchanged from their respective regional flood models. Upstream and downstream boundary conditions in the models included storm inflows (for 100-year, 50-year, 25-year, 10-year and 5-year storm floods), extracted from GRCA's respective HEC-2 models, along the reaches and downstream channel bed slopes. Note that the 2-year storm flow data were not provided by GRCA and hence these were not included in the assessment. Tables 1 and 2 provide input boundary conditions (storm inflows for 5-year to 100-year storm floods) for HEC-RAS models along the reaches of Mill Creek and Tributary 3, respectively.

4.0 RESULTS

The results of the HEC-RAS modeling based on CGVD2013 / NAD1983 are presented as storm flood elevations (Tables 3 and 4) and the floodplain maps (Figures 1.2 through 1.6) along the reaches of Mill Creek and Tributary 3. The summary of results is as follows:

- **Mill Creek:**
 - Floodplain boundaries of 100-year and 50-year storm floods, were found to overlap the Site boundary at the northeastern corner of the Property, however, floods were not found to extend beyond the extraction area limit. No flooding was observed in the other parts of the Site due to Mill Creek. Flood due to 2-year storm (being relatively lower than 5-year storm) is expected to be contained within the creek channel and not enter the Site boundary.
 - Storm flood elevations at the northeast corner of the Property, where the Mill Creek flood water is found to enter the Property (Section 14551), ranged from 303.61 metres above sea level (masl) for 100-year storm flood to 303.17 masl for 5-year storm flood.
- **Tributary 3:**
 - Floodplain boundaries of all storm floods were found to overlap the Site boundary, however, only the 100-year and 50-year storm floods were found to extended beyond the extraction area limit. Note that the extraction area is located on the southern side of the Tributary 3. Flood levels due to 2-year storm (being relatively lower than 5-year storm) is expected to be contained within the tributary channel and not extend beyond the banks.

- Storm flood elevations at the northern corner of the Property, where the Tributary 3 flood water is found to enter the Property (Section 1600.1), ranged from 302.8 masl for 100-year storm flood to 302.61 masl for 5-year storm flood.

5.0 POTENTIAL IMPACTS TO SURFACE WATER

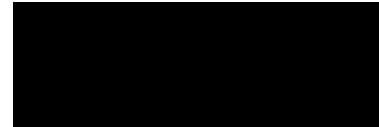
- Due to the overlapping of floodplain and the extraction area, flood water is expected to enter the Site and extraction area, however, in general, the flooding due to 2-year storm event is expected to be contained within the creek channel. It is expected that the pits in the extraction area would act as storage area and provide additional temporary storage capacity for the flood water in comparison to the current conditions, which would help reduce the effects of flooding downstream from the Site. By extension, the retention of runoff and reduction to peak flows would lead to the potential for lower rates of sediment erosion / transport.
- It is expected that the large flood events would result in a temporary stoppage in operations, depending on the elevation of the flood waters. If pit access or the safe operation of equipment is at risk, operations will be stopped. This stoppage is expected to be short-lived, as flood waters are expected to recede in a matter of days and the potential for significant damage to the site infrastructure would be minimal.
- Pit operations will be planned to limit the risks of flood water being conveyed through the pit pond(s) and short circuiting of the creek channel. This will be achieved through perimeter grading up to an elevation of 304.6m to control flood water bypassing the channel and extraction planning. Figure 1.7 shows the location of proposed perimeter grading. Note that even with the additions of perimeter grading that increases ground elevations in some areas, the pit extraction will still have an overall benefit to flood volumes in the area as the pit would provide additional storage for water if the flood reached the extraction limit at the northeast corner of the property. The site plans have been updated to address flood risk potential and the comments received so the pit pond can provide flood storage without short circuiting. Updated site plans are provided in the attachments.

6.0 CLOSURE

We trust that this technical memorandum meets your current needs. If you have any questions or require clarification, please contact the undersigned at your earliest convenience.

WSP Canada Inc.


Mohsin Siddique, PhD, PEng
Water Resources Engineer



Craig DeVito, PEng
Water Resources Engineer

MS/CDV/ld

Attachments: **Tables:**

- Table 1: Storm Inflows along Mill Creek
- Table 2: Storm Inflows along Tributary 3
- Table 3: Water Surface Elevations of Storm Floods along Mill Creek
- Table 4: Water Surface Elevations of Storm Floods along Tributary 3

Figures:

- Figure 1.1: Site Location and Cross Sections
- Figure 1.2: Storm Flood Elevation Map for 100-year Storm Flood
- Figure 1.3: Storm Flood Elevation Map for 50-year Storm Flood
- Figure 1.4: Storm Flood Elevation Map for 25-year Storm Flood
- Figure 1.5: Storm Flood Elevation Map for 10-year Storm Flood
- Figure 1.6: Storm Flood Elevation Map for 5-year Storm Flood
- Figure 1.7: Perimeter Grading Location Map

<https://wsponline.sharepoint.com/sites/gld-21291g/deliverables/4000 5000 hydrogeology level 1 and 2/10 floodplain assessment/1791470a-tm-revx-cbm lake flood assessment-23june2025.docx>

REFERENCES

Government of Canada (2024). GPS.H tool. Available at: <https://webapp.csrs-scrs.nrcan-rncan.gc.ca/geod/tools-outputs/gpsh.php>

TABLES

Table 1: Storm Inflows along Mill Creek

Cross-section ID	Storm Inflow (m ³ /s)					
	Regional Flood (1982)	100-year	50-year	25-year	10-year	5-year
19380	127	15	12.5	9.8	6.2	4.1
16101	165	18.4	16	13.3	9.2	6.2
12200	165	16	14.2	12.5	9.2	6.4
8901.4	165	14.6	13.3	11.5	8.5	6
8886.3	153	n/a	n/a	n/a	n/a	n/a
4560	141	13.2	12	10.5	7.8	5.6

n/a: not applicable

Table 2: Storm Inflows along Tributary 3

Cross-section ID	Storm Inflow (m ³ /s)					
	Regional Flood (1982)	100-year	50-year	25-year	10-year	5-year
1600.4	15.3	2.4	1.9	1.4	0.8	0.5

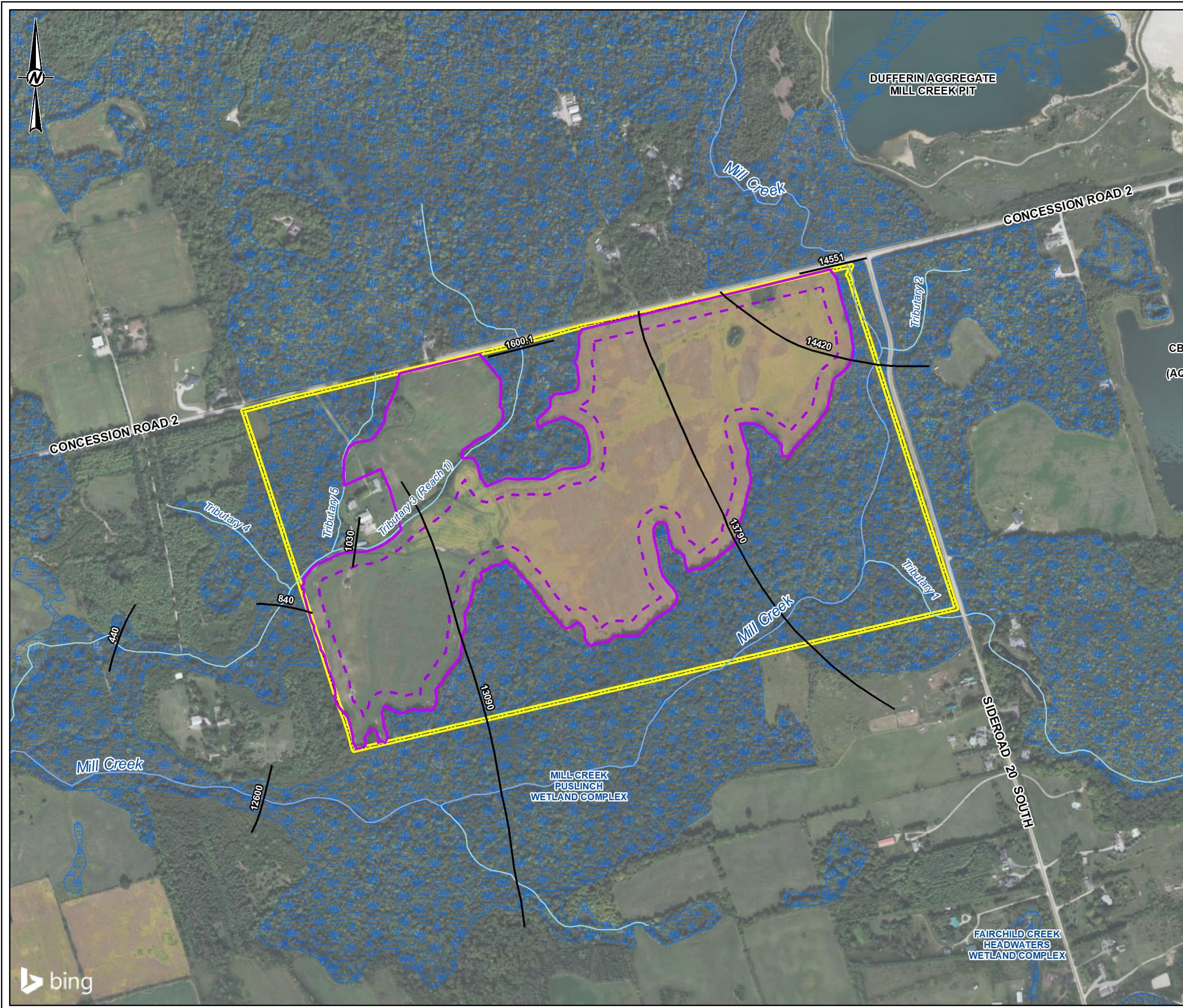
Table 3: Water Surface Elevations of Storm Floods along Mill Creek

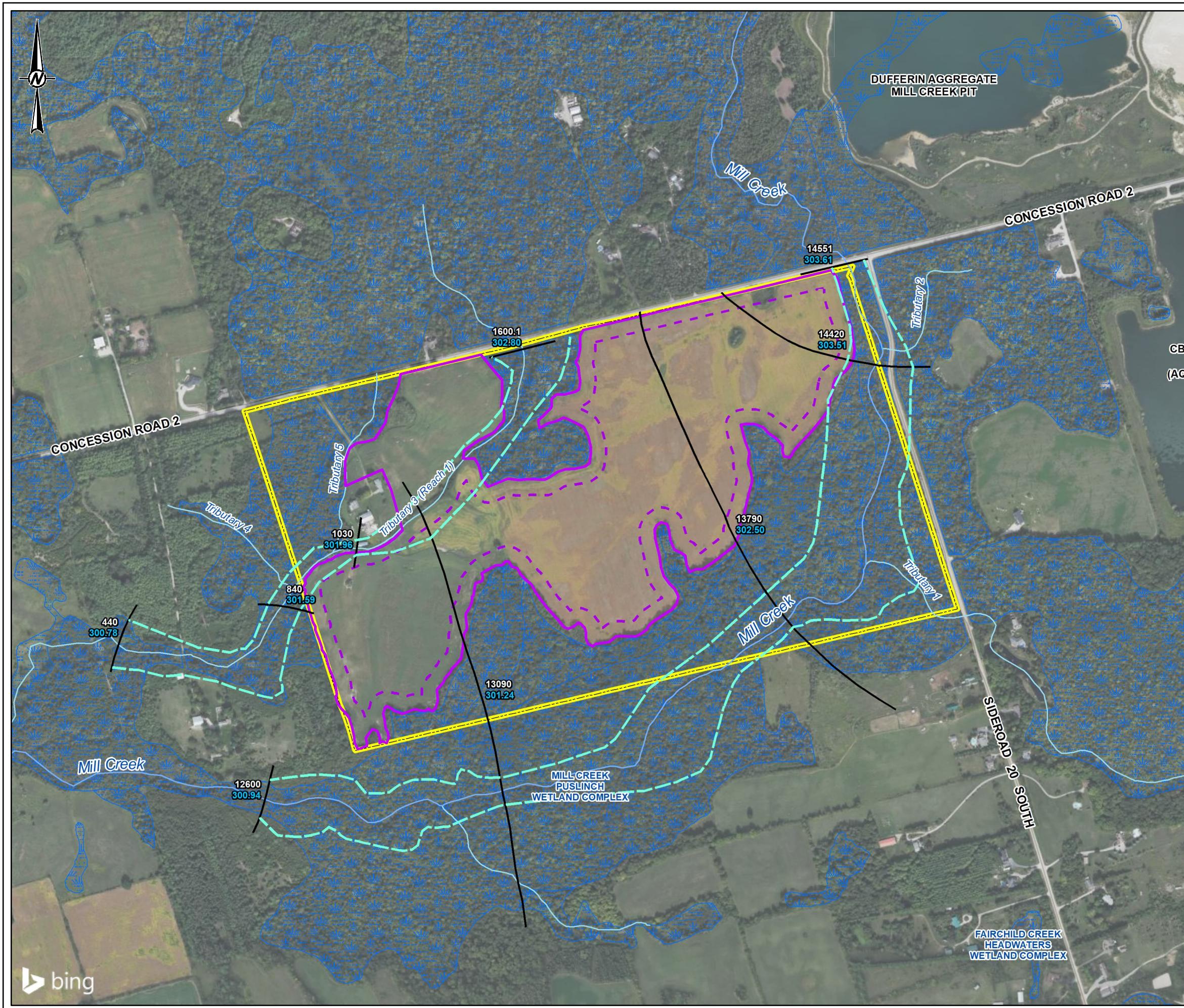
Cross Section ID	Storm Flood Elevations (masl)					
	Regional Flood (1982)	100-year	50-year	25-year	10-year	5-year
14551	304.55	303.61	303.55	303.48	303.33	303.17
14420	304.48	303.51	303.45	303.37	303.19	303.01
13790	303.75	302.50	302.43	302.34	302.18	302.03
13090	303.27	301.24	301.17	301.08	300.91	300.76
12600	302.80	300.94	300.86	300.77	300.59	300.41

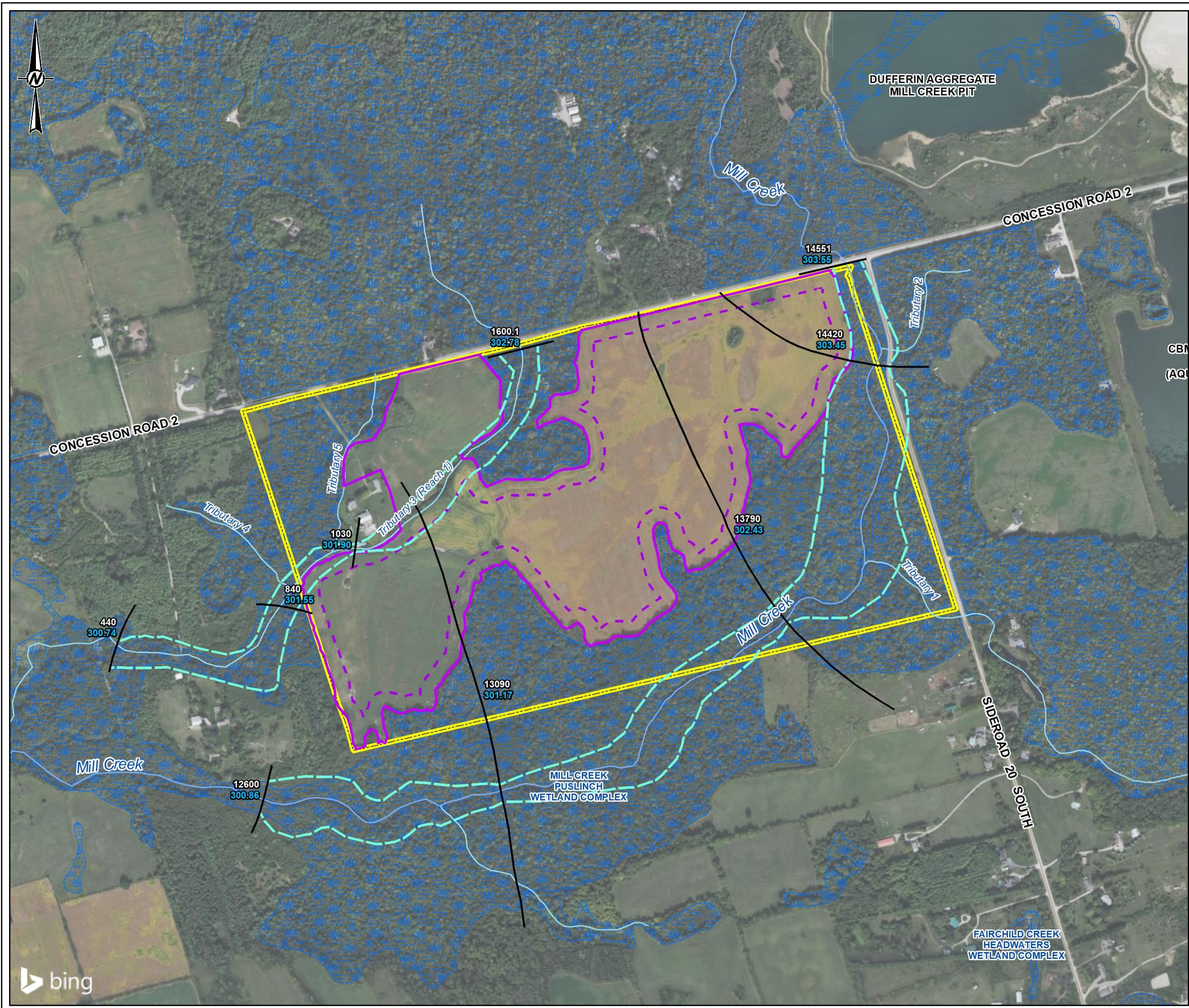
Table 4: Water Surface Elevations of Storm Floods along Tributary 3

Cross Section ID	Storm Flood Elevations (masl)					
	Regional Flood (1982)	100-year	50-year	25-year	10-year	5-year
1600.1	303.19	302.80	302.78	302.74	302.65	302.61
1030	302.55	301.96	301.90	301.84	301.86	301.79
840	302.03	301.59	301.55	301.50	301.21	301.14
440	301.66	300.78	300.74	300.71	300.65	300.61

FIGURES







LEGEND

- CROSS-SECTION
- FLOODPLAIN EXTENT
- WATERCOURSE
- ROAD
-  PROVINCIAL SIGNIFICANT WETLAND (EVALUATED)
-  PROPERTY BOUNDARY
-  LICENCE BOUNDARY / SITE BOUNDARY
-  PROPOSED EXTRACTION AREA

CLIENT
CBM AGGREGATES, A DIVISION OF ST. MARYS CEMENT INC.
(CANADA)

PROJECT
ABERFOYLE SOUTH LAKE PIT

TITLE

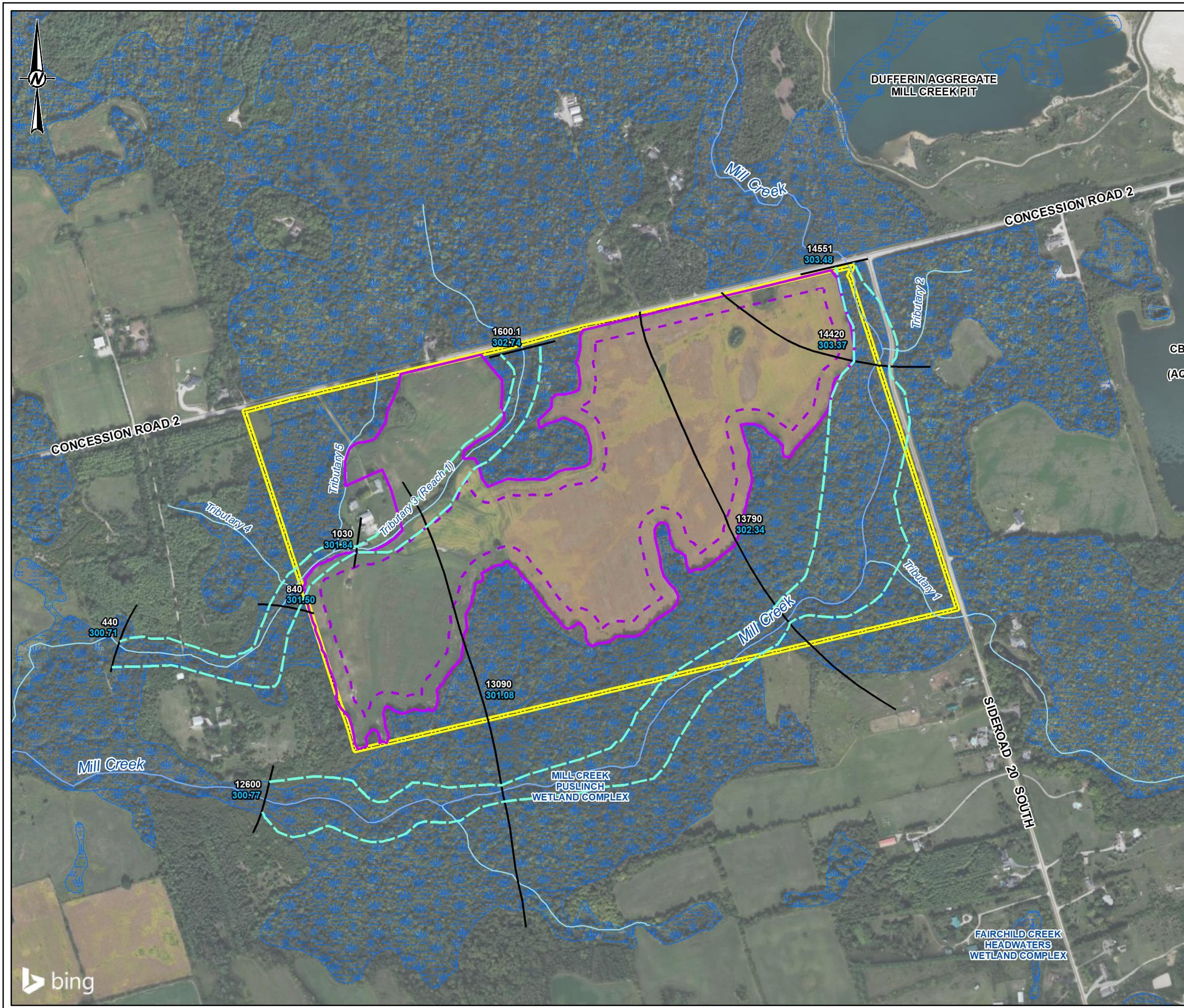
**STORM FLOOD ELEVATION MAP - 50 - YEARS FLOOD LEVELS
(CGVD2013)**

CONSULTANT	YYYY-MM-DD	2025-01-23
DESIGNED	ST	
PREPARED	KP	
REVIEWED	AS	
APPROVED	HM	

PROJECT NO.	CONTROL	REV.	FIGURE
1791470	0017	0	1.3

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FIGURE 1.3



LEGEND

- CROSS-SECTION
- FLOODPLAIN EXTENT
- WATERCOURSE
- ROAD
- PROVINCIAL SIGNIFICANT WETLAND (EVALUATED)
- PROPERTY BOUNDARY
- LICENCE BOUNDARY / SITE BOUNDARY
- PROPOSED EXTRACTION AREA

0 100 200 300 400
1:7,500 METRES

REFERENCE(S)

- BASEDATA: MNRF LIO, OBTAINED 2024
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- © 2025 MICROSOFT CORPORATION © 2025 MAXAR ©CNES (2025) DISTRIBUTION AIRBUS DS IMAGE SEPTEMBER 2016
- PROJECTION: TRANSVERSE MERCATOR DATUM: NAD 83 COORDINATE SYSTEM: UTM ZONE 17N

CLIENT
CBM AGGREGATES, A DIVISION OF ST. MARYS CEMENT INC.
(CANADA)

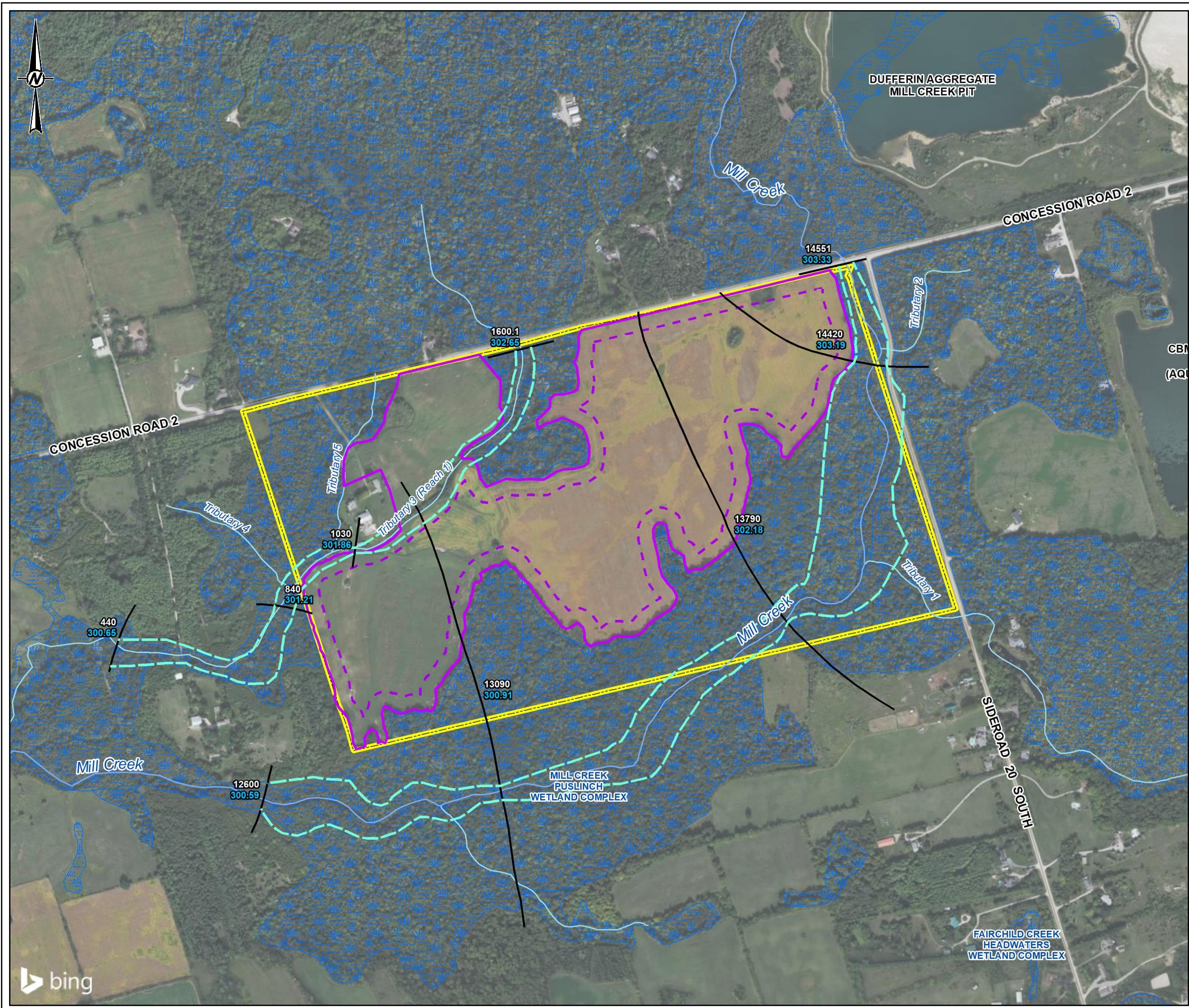
PROJECT
ABERFOYLE SOUTH LAKE PIT

TITLE
**STORM FLOOD ELEVATION MAP - 25 -YEARS FLOOD LEVELS
(CGVD2013)**

CONSULTANT	YYYY-MM-DD	2025-01-23
DESIGNED	ST	
PREPARED	KP	
REVIEWED	AS	
APPROVED	HM	

PROJECT NO. 1791470 CONTROL 0017 REV. 0 FIGURE 1.4





LEGEND

- CROSS-SECTION
- FLOODPLAIN EXTENT
- WATERCOURSE
- ROAD
-  PROVINCIAL SIGNIFICANT WETLAND (EVALUATED)
-  PROPERTY BOUNDARY
-  LICENCE BOUNDARY / SITE BOUNDARY
-  PROPOSED EXTRACTION AREA

0 100 200 300 400
1:7,500 METRES

CLIENT
CBM AGGREGATES, A DIVISION OF ST. MARYS CEMENT INC.
(CANADA)

PROJECT
ABERFOYLE SOUTH LAKE PIT

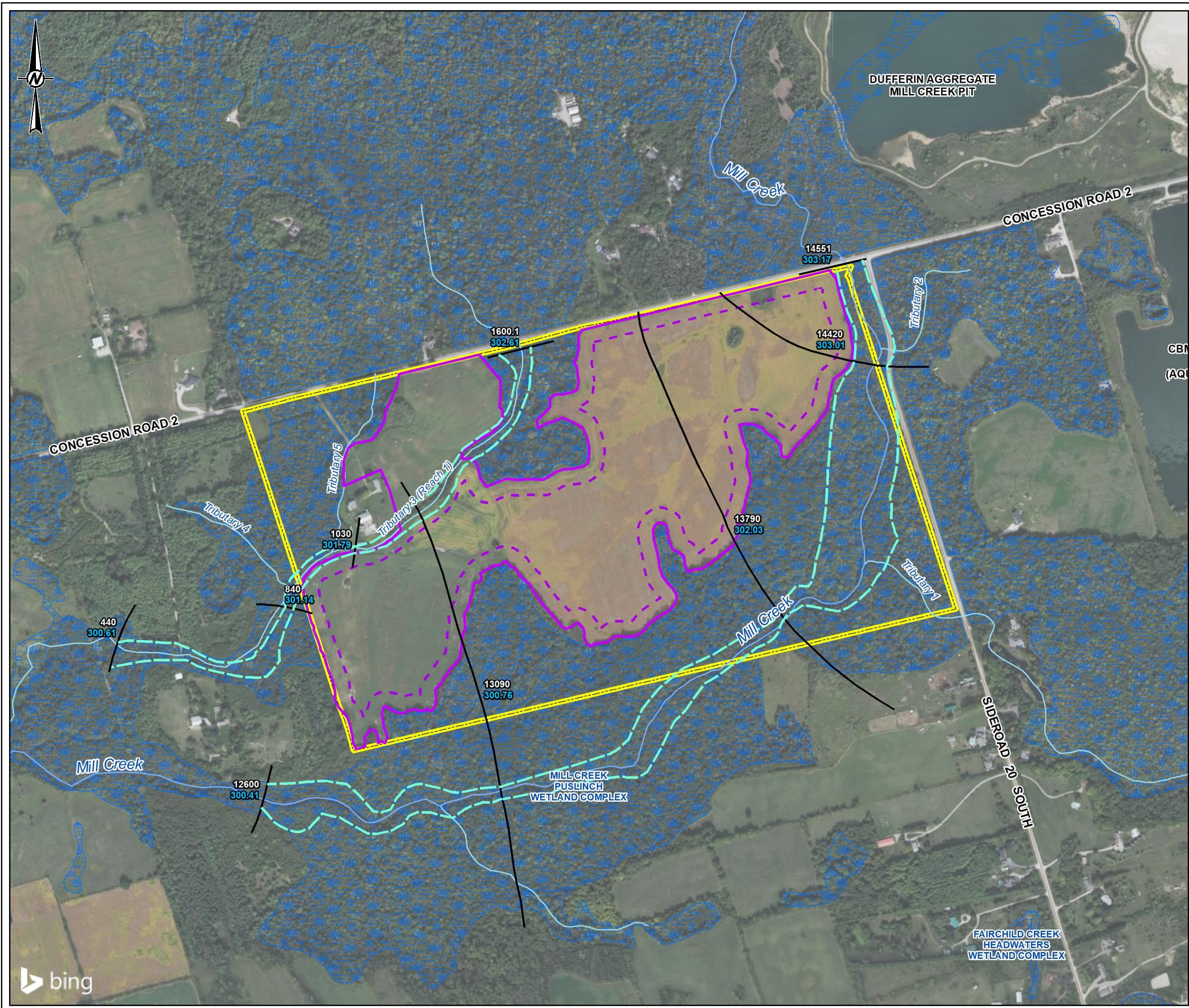
TITLE

**STORM FLOOD ELEVATION MAP - 10 - YEARS FLOOD LEVELS
(CGVD2013)**

CONSULTANT	YYYY-MM-DD	2025-01-23
DESIGNED	ST	
PREPARED	KP	
REVIEWED	AS	
APPROVED	HM	

PROJECT NO.	CONTROL	REV.	FIGURE
1791470	0017	0	1.5

FIGURE 1.5



LEGEND

- CROSS-SECTION
- FLOODPLAIN EXTENT
- WATERCOURSE
- ROAD
-  PROVINCIAL SIGNIFICANT WETLAND (EVALUATED)
-  PROPERTY BOUNDARY
-  LICENCE BOUNDARY / SITE BOUNDARY
-  PROPOSED EXTRACTION AREA

0 100 200 300 400
1:7,500 METRES

CLIENT
CBM AGGREGATES, A DIVISION OF ST. MARYS CEMENT INC.
(CANADA)

PROJECT ABERFOYLE SOUTH LAKE PIT

TITLE

**STORM FLOOD ELEVATION MAP - 5 - YEARS FLOOD LEVELS
(CGVD2013)**

CONSULTANT	YYYY-MM-DD	2025-01-23
DESIGNED	ST	
PREPARED	KP	
REVIEWED	AS	
APPROVED	HM	

PROJECT NO. CONTROL REV. FIGURE
1791470 **0017** **0** **1.6**

FIGURE 1.6

