



December 4, 2025

Justine Brotherston
Director of Corporate Services/Municipal Clerk
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0

Meagan Ferris, RPP MCIP
Manager of Planning and Environment
County of Wellington Planning & Development
74 Woolwich Street
Guelph ON N1H 3T9

Dear Justine and Meagan:

**RE: CBM Aberfoyle South Lake Pit
Response to Township and County Comments
6947 Concession Road 2, Township of Puslinch
OUR FILE Y321AB**

The purpose of this letter is to provide an update on the CBM Aberfoyle South Lake Pit application (formerly known as the Aberfoyle South Pit Expansion), respond to the comments received to date through the Township of Puslinch and County of Wellington, and request that the Township and County deem the Zoning By-law Amendment and Official Plan Amendment applications complete.

By way of background, the following provides a brief chronology of relevant actions undertaken for the Aberfoyle South Lake Pit application:

Date	Action
December 18, 2019	CBM notified Township Council of its intent to move forward with pit application
January 27, 2021	CBM submits terms of reference for Traffic Study
August 24, 2021	CBM submits pre-consultation meeting request to Township and County
September 28, 2021	Pre-consultation meeting held with Township, County and GRCA
October 12, 2021	CBM submits terms of reference for Natural Environment and Water Resources Studies
December 17, 2021	CBM provides update to Township Council on status of application
June 14, 2023	CBM submits request for second pre-consultation meeting

July 26, 2023	CBM provides update to Township and County on status of application
July 27, 2023	Second pre-consultation meeting held with Township, County and GRCA
September 7, 2023	CBM submits updated terms of reference for Natural Environment and Water Resources Studies
October 31, 2023	CBM provides update to Township and County on timing for application submission. Township provides CBM with "Comment Summary" from July 27, 2023 pre-consultation meeting.
November 29, 2023	CBM submitted County Official Plan Amendment application and moved forward with Step 2 of the Township's Pre-Consultation Process. The same studies and application materials were provided to both the County and Township*. In conjunction, CBM also submitted Class A Licence Application under Aggregate Resources Act to MNR.
December 22, 2023	MNR deems ARA Licence Application complete
January 19, 2024	County issues Acknowledgement of Application and assigns file number (OP-2023-03).
January 30, 2024	CBM responds to County's Acknowledgement of Application and provides proof of notice sign posting.
March 27, 2024	CBM submits Visual Impact Assessment to Township and County
March 28, 2024	CBM initiates notification and consultation process under ARA
April 29, 2024	Township provides comments on the "2 nd submission" of the application which included detailed comments from the County, peer reviewers and internal departments.
May 8, 2024	CBM hosts ARA Public Information Session
May 10, 2024	Township submits objection to ARA application
May 27, 2024	County submits objection to ARA application
June 6, 2024	Bill 185 receives Royal Assent which repealed the Bill 109 fee refund framework and removed the requirement to consult with municipalities before submitting planning applications
June 5, 2025	Bill 17 receives Royal Assent which made changes to how complete applications are determined

*Nov 2023 application materials included Planning Report & Aggregate Resources Act Summary Statement Report, Natural Environment Report, Water Report (Level 1 and 2), Maximum Predicted Water Table Report, Stage 1 and 2 Archaeological Assessment, Stage 3 Archaeological Assessments, Noise Assessment Report, Transportation Impact Assessment, Best Management Practices Plan for the Control of Fugitive Dust, Agricultural Review, Aggregate Resource Evaluation, ARA Site Plan, County OPA Application Form and Fee (\$57,380), Public Consultation Strategy, Source Water Protection Screening Form, Ownership Information, and MCM Acceptance Letter.

As noted in the chronology above, CBM submitted a Class A Licence application to MNR in conjunction with the planning applications. The same technical studies and site plan were submitted as the

planning applications. MNR deemed the Licence application complete on December 22, 2023. CBM is in the consultation stage of the Licence application and is in the process of responding to comments received under the ARA.

On April 29, 2024, the Township provided comments on the "2nd submission" of the application which included detailed comments from the following reviewers:

- County of Wellington
- GM Blue Plan Engineering
- Harden Environmental Services Ltd.
- Aboud & Associates Inc.
- Stovel and Associates Inc.
- Salvini Consulting
- Valcoustics Canada Ltd.
- Wellington Source Water Protection
- Grand River Conservation Authority
- Township of Puslinch Departments

In total, there were over 70 pages of comments provided on the application including the technical studies and site plan.

As a result of the comments received, CBM and its project team have undertaken additional investigations and studies, and have proposed changes to the application in response to these comments. In summary, CBM has made the following key changes to the application:

- In response to confusion surrounding the name of the original proposal as a pit expansion, CBM has renamed the proposed pit "Aberfoyle South Lake Pit". The application continues to be assessed as a new pit application under the ARA.
- Development of a Hydrological and Ecological Monitoring Plan.
- Additional mitigation measures to protect adjacent natural features and surrounding lands including flood and groundwater uplift mitigation, enhanced visual screening and pit entrance improvements.
- Additional groundwater and surface water monitoring locations.
- Geotechnical requirements for haul route.
- Additional noise restrictions and conditions on pit operating equipment.
- Incorporation of specific rehabilitation targets and thresholds for tree planting areas.

The following additional studies and responses are being provided to the Township and County in response to the April 29, 2024 comments:

1. Natural Environment and Water Report Terms of Reference Concordance Cross-Check, January 27, 2025, WSP
2. Response to GM Blue Plan Engineering and Salvini Comments, February 5, 2025
3. Revised Transportation Impact Study, February 2025
4. Flood Mapping – Technical Memorandum, August 12, 2025, WSP

5. Supplemental Assessment of Potential Impacts to Baseflow in Mill Creek and Tributary 3, October 21, 2025, WSP
6. Supplemental Assessment of Potential Impacts to Provincially Significant Wetlands, October 21, 2025, WSP
7. Supplemental Assessment and Mitigation of Post-Rehabilitation Groundwater Uplift, October 21, 2025, WSP
8. Hydrological and Ecological Monitoring Plan, October 21, 2025, WSP
9. Headwater Drainage Feature Assessment, October 22, 2025, WSP
10. Response to Harden Environmental Comments, October 22, 2025, WSP
11. Response to GRCA Comments, October 22, 2025, WSP
12. Response to Wellington Source Water Protection Comments, October 22, 2025, WSP
13. Response to Aboud & Associates Comments, October 22, 2025, WSP
14. Response to GM Blue Plan Engineering Comments, October 22, 2025, WSP
15. Response to Stovel Comments, October 22, 2025, WSP
16. Response to Valcoustics Comments, October 31, 2025, WSP
17. Response to Comments on Site Plan and Planning Report, November 26, 2025, MHBC
18. Revised Aggregate Resources Act Site Plan, November 2025, MHBC

These materials can be downloaded from the following link: [CBM Aberfoyle South Lake Pit - Response to Township and County Dec 2025](#)

Please note that the changes made to the Site Plan since submission in November 2023 are identified in redline.

Within the Sharepoint link, we have also included the studies and materials included with the November 2023 submission.

In accordance with the Township requirements, these materials and the Zoning By-law Amendment application form will be uploaded to CloudPermit.

On November 25, 2025, CBM submitted a cheque to the Township for the Zoning By-law Amendment application fee (\$80,000). The Township received the cheque and advised on December 2, 2025 that the cheque for the Zoning By-law Amendment application had been processed.

The application fee for the County Official Plan Amendment application was previously submitted to the County as part of the November 2023 submission.

We would note that the changes made by the Province through Bill 185 removed the requirement for mandatory pre-consultation as well as the application fee refund framework and Bill 17 changed the complete application requirements including deeming provisions for completeness based on reports completed by prescribed professionals.

Notwithstanding the extensive pre-consultation discussions that have occurred on this project, CBM has provided the prescribed information, materials and fees along with other information requested by the Township and County in accordance with the requirements of the Planning Act. Therefore,

CBM is requesting that the County and Township deem the Official Plan Amendment application and Zoning By-law Amendment application complete, respectively.

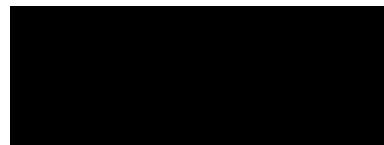
If you have any questions, please let us know.

Yours truly,

MHBC



Yara Elmahdy, BES



Neal DeRuyter, BES, MCIP, RPP

*cc. Courtenay Hoytfox, Township of Puslinch
Rob Stovel, Stovel and Associates Inc.
Andreanne Simard / Stephen May, CBM
Jonathan Kahn, Blake, Cassels & Graydon LLP*

Encl.