



November 26, 2025

Stephen May
CBM Aggregates - Lands Manager - Western Region
7366 McLean Rd. R.R.#22
Cambridge, ON N3C 2V4

Dear Steve:

**RE: Responses to Township of Puslinch and County of Wellington Comments on Aberfoyle South Lake Pit Application
OUR FILE Y321AB**

The following tables provide responses to the comments received through the Township of Puslinch and County of Wellington on April 29, 2024 as it relates to the Planning Report and Aggregate Resources Act Site Plan prepared by MHBC.

Township of Puslinch Building Department

Comment #	Township Building Department Comment	MHBC Response
1.	<p>Please clarify the intent and use of the buildings that remain on the site?</p> <p>If the plan is to demolish the buildings, we require demolition permits. If any of the buildings are being used for office spaces or any use other than the original use of the building, a "change of use" permit will be required.</p>	<p>The buildings on site will continue as currently used. It should be noted that the buildings are outside of the proposed licence area of the pit and are not proposed to be rezoned.</p>

County of Wellington Comments

Comment #	County of Wellington Comment	MHBC Response
1.	<p>It is noted that this proposal was submitted with a concurrent application to the County of Wellington (Official Plan Amendment). An acknowledgement letter was provided to the applicant dated January 19th, 2024 and requires a</p>	<p>Notice signs were posted both along Concession Road 2 and Sideroad 20 frontages in March 2024.</p> <p>CBM looks forward to receiving the notice of complete application for the Official Plan Amendment application.</p>

Comment #	County of Wellington Comment	MHBC Response
	<p>notice sign to be posted in order to deem the application complete.</p> <p>Once complete, a Notice of a Complete application for the OPA will be circulated to all agencies and the Township. All technical comments for the Township will assist in the review and consideration of the proposed Official Plan Amendment.</p> <p>Detailed County planning comments will be provided through the review of the Official Plan Amendment and shared with the Township.</p>	
2.	<p>A pre-consultation meeting for this proposal took place on July 27th, 2023. As part of that meeting the County identified several studies and followed up in written format via a letter dated September 8th, 2023. A series of studies were identified to be submitted most of which appear to have been provided, except for a Visual Impact Study. The applicant has confirmed this study will be provided by April 1st, 2024. Once received, the Township may wish to consider having this study peer reviewed.</p>	<p>The Visual Impact Assessment was submitted to the County and Township on March 27th, 2024.</p> <p>Please note that a pre-consultation meeting with the County, Township and GRCA also took place on September 28th, 2021.</p>
3.	<p>The application refers to this proposal as an “expansion”; however, its unclear why it is being characterized this way. Based on the proposal, applying Section 4.2.8.2 c) of the Growth Plan does not appear to be appropriate. Additional discussion and assessment of the policies in Section 4.2.8.2 are required.</p>	<p>As a result of comments received on this matter, CBM has decided to rename the proposed pit to “Aberfoyle South Lake Pit” to avoid confusion with the expansion terminology. It should be noted that the Growth Plan was repealed in October 2024 and is no longer in effect.</p>
4.	<p>Please be aware that the County continues to issue Objection Letters to new and expanding aggregate operations submitted under the Aggregate Resources Act.</p>	<p>The County’s objection letter was received on May 27, 2024.</p>
5.	<p>The County Official Plan identifies the land use designations on-site as Greenland System due to natural</p>	<p>Acknowledged.</p>

Comment #	County of Wellington Comment	MHBC Response
	<p>features on-site, which includes floodplain, PSW, locally significant wetlands, significant woodlands, and an Environmentally Sensitive Area (Galt Creek and Forest).</p> <p>As the subject lands are located within the Greenland System, as identified in the Official Plan, the ecological peer reviewer will need to be satisfied that the subject development is also consistent with Part 5 of the Official Plan; that the associated ecological assessment also addresses Section 4.6.2 Environmental Impact Assessment of the Official Plan; and consistency with Provincial policy.</p>	
6.	<p>As these lands are not part of the Greenbelt Plan, the Provincial Agricultural System mapping is not yet in effect on the subject lands. Based on the former Township Official Plan, the underlying land use designation appears to be Secondary Agricultural Area.</p> <p>The applicant has submitted an Agricultural Consideration Letter dated September 8th, 2023 and indicates within their letter that the review utilized the draft Provincial Agricultural Impact Assessment to assess the impacts of the use. The letter and conclusion of said letter also need to confirm compliance with the Official Plan and Section 4.6.5 Agricultural Impact Assessment within the Official Plan. Additional comments regarding this letter may be provided through the Official Plan amendment review.</p>	<p>As a result of the repeal of the Growth Plan, the Provincial Agricultural System mapping only remains in effect for the Protected Countryside of the Greenbelt for which this site is not located. The site is not designated Prime Agricultural in the County's Official Plan.</p> <p>The site is also not designated Secondary Agricultural based on a review of Schedule B7 of the County's Official Plan. The former Township of Puslinch Official Plan is not in effect and has no bearing on this application.</p>
7.	<p>The current zoning appears to be Natural Environment (NE) Zone, with the Environmental Protection Overlay, and some small area identified as Agriculture (A) Zone.</p>	<p>The draft Zoning By-law Amendment included with the application proposes to rezone the 30 m setback from adjacent natural features to the NE Zone and EP Overlay.</p>

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	<p>It is understood that the applicant intends to rezone the subject lands to an Extractive (EXI) Zone, refine the Natural Environment (NE) Zone and apply the Environmental Protection Overlay. It is generally encouraged that the 30 m setback from the adjacent natural features be placed in the NE Zone and subject to the Environmental Protection Overlay.</p>	
8.	<p>It is noted that there is a dwelling on-site that will be retained but is currently being utilized as an office. It appears that the dwelling is not included in the noise study for that reason.</p>	<p>The dwelling is currently used as a farm office and is not proposed to change as a result of this application.</p>
9.	<p>Detailed comments on the zoning are to be prepared by the Township's planning consultant (Stovel and Associates) and the zoning should align with any resulting Official Plan schedule, if approved.</p>	<p>Acknowledged.</p>

GM BluePlan Engineering Comments

Comment #	GM BluePlan Engineering Comment	MHBC Response
4.	<p><u>GMBP Comment (July 27, 2023)</u> New entrances onto Concession No 2 are to be paved 20m before the edge of travelled lane to reduce debris tracked onto Concession 2.</p> <p><u>Response (November 30, 2023)</u> Site Plan drawings provided.</p> <p><u>GMBP Comment (January 31, 2024)</u> Extent of pavement at the proposed entrance does not appear to be indicated in the drawings.</p>	<p>The extent of the 20-metre paved entrance has been added to the proposed truck entrance on the revised ARA Site Plan.</p>
5.	<p><u>GMBP Comment (July 27, 2023)</u> Proponent to include a maintenance plan for Concession No 2, to address dust mitigation and mud / debris cleanup.</p> <p><u>Response (November 30, 2023)</u></p>	<p>Details related to the maintenance of Concession 2 would need to occur directly with the Township as is the case on other sections of the roadway with CBM.</p>

Comment #	GM BluePlan Engineering Comment	MHBC Response
	<p>Best Management Practices Plan for the Control of Fugitive Dust provided.</p> <p><u>GMBP Comment (January 31, 2024)</u></p> <p>The provided report includes plans for the entrance and internal roadways but not Concession 2. Please provide a maintenance plan for the paved roadway, including inspection and mud / debris cleanup.</p>	
8.	<p>The water level of the lake in rehabilitated conditions is predicted to be “±302m,” suggesting uncertainty and that the water level could end up higher. Contours show that ground elevations are close to 302m along the lake at the southwest end, which could result in the lake spilling over without flood control measures.</p> <p>Please show additional contours outside the proposed lake, including Mill Creek. Provide two additional cross-sections showing the water levels of the proposed lake and Mill Creek: one for the northeast corner of the lake, cutting across Mill Creek and Sideroad 20; and another for the southwest corner, cutting across the proposed wetland and Mill Creek (refer to the attached drawing). Include flood control measures if necessary.</p>	<p>The ARA Site Plan has been revised to address this concern based on updated technical information and mitigation measures including the incorporation of perimeter grading to act as a flood control measure. Please refer to WSP Technical Memo on Flood Mapping dated August 12, 2025.</p>

Stovel and Associates Inc. Comments

Comment #	Stovel Comment	MHBC Response
ARA Site Plans		
1.	Page No. 1	The proposed licence limits are irregular in shape. SAI requests a copy of the digital survey file for the licence and extraction limits and clarification as to how these limits were determined. Given the irregular shape of the proposed licence and extraction limits, it is important to

Comment #	Stovel Comment	MHBC Response
	<p>ensure that the limits can be replicable in the field and on the Site Plan.</p> <p><i>Question/Comment: How were the licence limits established? Were the proposed limits surveyed?</i></p>	<p>operation should not be included in the licence. The extraction limits will be marked in the field by a surveyor prior to start of pit operations.</p>
2.	<p>Page No. 1</p> <p>It is noted that the proposed pit licence does not include the existing residential structure, yet a small agriculture field (that includes the archaeological resource area AiHb-374) is included within the proposed licence limits. Clarification of the rationale for the proposed licence limits should be provided.</p> <p><i>Question/Comment: Explain why the house was not included in the licence. Explain the future use of the house.</i></p>	<p>The house on the property is currently used as an office for the farm use and is not proposing to change. It is not included in the licence as it is not directly related to the proposed pit operation.</p>
3.	<p>Page No. 1</p> <p>If no extraction or processing is proposed for the lands surrounding AiHb-374, why is this area included in the Licence?</p> <p><i>Question/Comment: Explain why this resource was included in the licence.</i></p>	<p>Archaeological resource area AiHb-374 is located within the licensed area at the northern edge of the subject lands that is not proposed for extraction or any aggregate-related activities as identified on the site plan. This land would remain under licence to ensure the protection of the identified archaeological resources and to provide potential additional lands for natural enhancement if required.</p>
4.	<p>Page No. 1</p> <p>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.</p> <p><i>Question/Comment: Monitoring stations are included on lands owned by the applicant beyond the licence</i></p>	<p>See WSP response #1 in Response to Stovel Review Comments (October 22, 2025).</p> <p>As occurs on other licensed sites, monitoring can occur beyond licence limits and is still enforceable under the ARA in accordance with the corresponding site plan notes and conditions. MNR has not raised this as an issue on this application.</p>

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	<p><i>limit. Explain why. Also, will the ARA requirements ensure that wells located beyond the licence limits are monitored properly and maintained/abandoned under the control of the ARA?</i></p>	
5.	<p><i>Question/Comment: Is the applicant seeking two entrances to the proposed pit?</i></p>	<p>Only one new entrance is proposed to access the proposed pit. The second entrance is an existing entrance used to access the house and farm. Pit trucks will not be permitted to use the existing entrance. This is identified on the site plan.</p>
6.	<p><i>Question/Comment: It is unclear how the vegetation limits shown on the Site Plan were demarcated. Do these limits reflect the surveyed dripline limits for adjacent woodlands and trees?</i></p>	<p>The on-site wetlands were field verified by WSP in consultation with GRCA. Other features identified on the Existing Features Plan are from base mapping and airphoto interpretation.</p>
7.	<p><i>Question/Comment: The depth of extraction extends deeper than the aggregate deposit shown in geological cross-sections. Recommend revising extraction depth.</i></p>	<p>See WSP responses #4 and #7 in Response to Stovel Review Comments (October 22, 2025).</p>
8.	<p>It is recommended that the applicant consider the use of a scale to ensure proper truck weights before entering the municipal road. The scale will also assist the applicant in tracking volumes being shipped from the proposed pit.</p> <p><i>Question/Comment: Recommend that the applicant include a scale to ensure that all trucks are scaled before they enter the municipal road.</i></p>	<p>Consistent with other nearby CBM feeder pits, a scale would not be required as extracted materials are weighed and tracked through loaders that load highway trucks.</p>
9.	<p>Additional vegetative plantings and sculpted berms are measures that could be considered. The Landscape Architect should develop schematics and a vegetation planting concept that can be implemented in the Site Plan. If the berms are to be seeded with grass mixture, it is</p>	<p>Additional tree screening has been added to the revised ARA Site Plan. CBM is open to further enhancements to berm design and landscaping and is willing to discuss this with the Township and County.</p>

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	<p>recommended that berm sloping should be made gentler to ensure that the berms can be mowed and maintained. The preference would be to have a landscaped entrance that is aesthetically appealing, especially in areas immediately adjacent to existing rural residences.</p> <p><i>Question/Comment: Entrance enhancements are recommended.</i></p>	
10. Page No. 2	<p>The proposed pit entrance is in proximity to residential receptors north of Concession Road 2. SAI reviewed the VIA. The results of the VIA are that sight lines into the proposed pit are evident in both the private and public realms. The VIA report concludes that proposed berms and tree plantings provide for screening of the operation.</p> <p>SAI recommends that the applicant seek the assistance of a Landscape Architect to improve the visual characteristics of this entrance and the sight lines along the municipal road. Additional vegetative plantings and sculpted berms are measures that could be considered. The Landscape Architect should develop schematics and a vegetation planting concept that can be implemented in the Site Plan. If the berms are to be seeded with grass mixture, it is recommended that berm sloping should be made gentler to ensure that the berms can be mowed and maintained. The preference would be to have a landscaped entrance that is aesthetically appealing, especially in areas immediately adjacent to existing rural residences.</p> <p><i>Question/Comment: Additional input from a Landscape Architect is recommended to assist in creating an</i></p>	See response to comment #9.

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	<p><i>aesthetically appealing sight line from the municipal road.</i></p>	
11.	<p>Page No. 2</p> <p>The berm schematic illustrates a berm height of 1.5 m yet the acoustic berms require a height of 4 m. A revised schematic should be presented to illustrate how the berm will be developed within the 30 m setback. As previously noted, revised side sloping along the municipal road may be required to allow for regular maintenance. Conversely, input from a Landscape Architect may be needed to ensure that the berms are aesthetically appealing and vegetated in a manner that effectively blends into the surrounding landscape. It is recommended that the authors of the VIA provide clarification concerning the potential sight lines into the pit from 6927 Concession Road 2. What sight lines are visible into the pit from this adjacent property? Will equipment be visible and from where?</p> <p><i>Question/Comment: Recommend that the schematic be revised to illustrate a 4 m high berm (as recommended by the acoustic engineer) and a gentler slope next to the municipal road to ensure that it can be maintained/mowed.</i></p>	<p>The typical berm schematic provided in the bottom left corner of Page 2 (Operational Plan) illustrates a minimum berm height of 4 m, not 1.5 m. The sloping of the berms is in accordance with standard requirements under the Aggregate Resources Act.</p> <p>The VIA erroneously indicated that 6927 Concession Road 2 is located north of the road whereas it is situated south of the road and the house is approximately 575 m from the road. Views from the house towards the site are restricted due to topography and intervening mature vegetation which is illustrated on Photo 24 of the VIA.</p>
12.	<p>Page No. 2</p> <p>In reviewing the Operations Plan, it was noted that as extraction proceeds to the final phase, the area for stockpiling/loading and extraction will be reduced to a point where there appears to be limited room left for the operation of equipment. It would be beneficial to provide a schematic illustrating in greater detail how the final phase will be operated given that there appears to be limited room to extract, then stockpile, then load and scale trucks before exiting</p>	<p>This is not atypical for below water extraction operations. Detailed schematics are not required for final extraction phases. This was not required for other recent CBM below water applications nor has MNR requested such information as part of their review of the ARA Site Plan.</p>

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	<p>the pit. The truck turnaround area should be shown with safe operating distances between the dragline excavator, loaders, and trucks. Sufficient room must be provided to ensure that truck queuing on the municipal road does not occur. SAI requests that this detailed schematic be provided to illustrate how the final phase will be extracted.</p> <p><i>Question/Comment: This is the final phase of the pit. It is recommended that a detailed phasing diagram illustrate how the final stages of this phase will be extracted.</i></p>	
13.	<p><i>Question/Comment: It is not clear what other licences will receive the aggregate from this site for processing, or if aggregate will be shipped to market without processing. It is recommended that this note be revised to specify which licences will receive aggregate from this proposed pit and that a scale be installed at this pit.</i></p>	<p>As stated in the Planning Report and Transportation Impact Study, the existing McNally Pit (Licence #5497) will receive aggregate from the proposed pit for processing. No material from the proposed pit will be shipped to market without processing.</p>
14.	<p>If this structure remains, site-specific zoning will be required to recognize the use of this building. We understand that the Township's acoustic consultant has identified a potential concern about the existing house not being included in the assessment.</p> <p><i>Question/Comment: What is the adjacent residential use? Is the applicant considering using the existing house as a residence? If not, remove this variation. If yes, the acoustic analysis will need to be updated to include this house as a receptor.</i></p>	<p>The house on the property is currently used as an office for the farm use and is not proposing to change. It is not inhabited and this will not change as a result of this application. This site plan variation has been removed on the revised ARA Site Plan.</p>
15.	<p><i>Question/Comment: The depth of extraction extends deeper than the aggregate deposit. Recommend revising related notes.</i></p>	<p>See WSP responses #4 and #7 in Response to Stovel Review Comments (October 22, 2025).</p>

Comment #	Stovel Comment	MHBC Response
16.	<p>Page No. 3</p> <p><i>Question/Comment: It is not clear if this note should be inserted into the Site Plan as the recommendation deals directly with the municipal road which is beyond the jurisdiction of the MNRF and ARA, and the Transportation Impact Study is not a documentation requirement of the ARA.</i></p>	<p>The MNR has not raised this as an issue on this application. The recommendations also include conditions that would apply to on-site activities including internal notice signs and entrance requirements.</p>
17.	<p>Page No. 3</p> <p>It is understood that the applicant prepared and submitted a BMPP for fugitive dust emissions. An Air Quality/Dust Emissions Study typically precedes the preparation of the BMPP. Regardless, the key recommendations of the BMPP should be recorded on the Site Plan.</p> <p>Similarly, the complaint protocol should be included (and address complaints related to water, trucking, dust, and noise).</p> <p><i>Question/Comment: Include these notes on the Site Plan.</i></p>	<p>The existing Site Plan notes ensure that CBM is required to operate in accordance with the Dust BMPP. However, key recommendations of the BMPP have been added to the revised ARA Site Plan.</p>
18.	<p>Page No. 3</p> <p><i>Question/Comment: Protocol to address noise and trucking complaints, not just water. Include the complaint protocol on the Site Plan.</i></p>	<p>For their other nearby operations, CBM has best management practices and protocols for dealing with such complaints. These procedures would also be utilized at this site.</p> <p>CBM is also willing to commit to a Public Liaison Committee for this site to promote regular, defined and open communications, and is willing to discuss this further with the Township and County.</p>
19.	<p>Page No. 4</p> <p><i>Question/Comment: Recommend removing the notes related to the importation of fill.</i></p>	<p>The MECP through Excess Soil Regulations determined that pits and quarries are acceptable sites to receive excess soils. This is carried forward with specific requirements outlined in O. Reg. 244/97. Allowing some importation of excess soil will help facilitate rehabilitation and the construction</p>

Comment #	Stovel Comment	MHBC Response
		of the proposed flood control measures.
20.	<p><i>Question/Comment: The depth of extraction extends deeper than the aggregate deposit shown in geological cross-sections.</i></p> <p><i>Recommend reducing the depth of extraction and the rehabilitated contours.</i></p>	See WSP responses #4 and #7 in Response to Stovel Review Comments (October 22, 2025).
21.	<p>Site Plan Modifications</p> <p>We have reviewed the comments from the Township's Ecological and Hydrogeological Peer Review consultants. Concerns were expressed related to the following (amongst others):</p> <ul style="list-style-type: none"> • Are the setbacks next to natural heritage features sufficient? • Should berms be located close to adjacent natural heritage features? • Is the depth of extraction justified given that boreholes were terminated 5 m above the proposed pit floor? • 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. <p>Modifications to the Site Plan may be required to address these types of concerns.</p>	<p>Please refer to WSP's response to Aboud's comments (October 21, 2025).</p> <p>The Site Plan has been revised taking into account these comments.</p>
Agricultural Considerations Report		
1.	It is our understanding that the County has determined that the subject property has an underlying designation of Secondary Agriculture. We also note that the County has	As a result of the repeal of the Growth Plan, the Provincial Agricultural System mapping only remains in effect for the Protected Countryside of the Greenbelt for

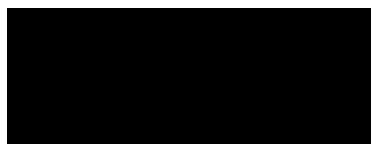
Comment #	Stovel Comment	MHBC Response
	<p>requested that the applicant address the Agricultural Impact Assessment provisions (4.6.5) set out in the County of Wellington Official Plan. In reviewing the assessment criteria, the <i>"potential interference with the movement of agricultural machinery on roads"</i> has not been documented in the Agricultural Considerations Report. Consultation with adjacent horse operations should also occur to determine the use (if any) of Concession 2 for horse-riding activities.</p>	<p>which this site is not located. The site is not designated Prime Agricultural in the County's Official Plan.</p> <p>The site is also not designated Secondary Agricultural based on a review of Schedule B7 of the County's Official Plan.</p>
Planning Report and Aggregate Resources Act Summary Statement		
2.	<p>It is understood that the Planning Report is reliant, to some extent, on the findings of other technical reports. Given this fact, an update of the Planning Report may be required following technical report updates that are the result of the peer reviews completed by the Township's Planning and Development Review Team.</p>	<p>This can be discussed with the Township and County.</p>
3.	<p>As previously noted, the applicant should clarify the rationale for the proposed licence limits in proximity to the existing house and the irregular licence boundary.</p>	<p>Please see response to Site Plan Comments #1 & #2.</p>
4.	<p>Also, the rationale for the use of the term "Expansion" should be provided, as there are policy implications with interpreting the proposal to be a pit expansion.</p>	<p>As a result of comments received on this matter, CBM has decided to rename the proposed pit to "Aberfoyle South Lake Pit" to avoid confusion with the expansion terminology. It should be noted that the Growth Plan was repealed in October 2024 and is no longer in effect.</p>
5.	<p>At this stage, it is recommended that a Holding Bylaw be required to implement considerations related to the haul route. A Development Agreement with the municipality will be required.</p>	<p>Please refer to the GM BluePlan comments dated February 6, 2024. This can be further discussed with the Township however road considerations can be dealt with</p>

Comment #	Stovel Comment	MHBC Response
		separately from the rezoning application.
6.	The future Zoning Bylaw Amendment ("ZBA") will need to address the use of the existing house and other structures. The use of these structures may need to be recognized in the ZBA.	The existing house and structures are located outside of the proposed license area. These will remain zoned Agriculture (A) and are not subject to the proposed ZBA.
7.	The delineation of the proposed site-specific Natural Environment – XXX zone may need to be revised based on the outcome of the Natural Heritage and Hydrogeological concerns set out in the Township's peer review comments.	Acknowledged.
8.	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 see response to Site Plan comment #19.
9.	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	See WSP responses #4 and #7 in Response to Stovel Review Comments (October 22, 2025).

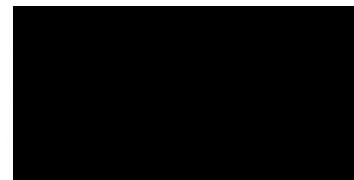
Comment #	Stovel Comment	MHBC Response
	reported in the WSP Aggregate Resource Evaluation. It is recommended that the proposed pit floor depths be adjusted to an elevation that has been substantiated by borehole results and suggested by WSP.	
10.	It is understood that the future intended rehabilitated end use for the site is a small lake with ecological enhancements. Will the rehabilitated property remain in private ownership, or will the lands be deeded to the municipality, should the Township want the lands?	This would be premature to determine at this time. However, should the Township be interested, CBM would be open to discussing this with them.
11.	In terms of future consultation, it is recommended that the applicant copy the Township with communications with the Department of Fisheries and Oceans and Indigenous communities.	CBM is required to undertake consultation with Indigenous communities in accordance with the delegated procedural aspects of duty to consult. Please contact MNR for further information. Communications with the Department of Fisheries and Oceans can be provided to the Township upon request.
12.	It is understood that geotechnical work needs to be scheduled on the municipal road. It is recommended that the applicant contact the Township directly to arrange for this work program, including the preparation of a borehole map and schedule. The details of this program can be worked out with municipal staff.	This has been addressed through TyLin and GMBP.
13.	Page 32 of the Planning Report indicates that: " <i>Best management practices and a spills protection plan will be in place for on-site fuel storage</i> ". The Site Plan indicates that there will be no fuel storage onsite (Page 3 of 5, Note J-1). This should be clarified. The applicant should be advised that the Township will require a copy of the Best	The Planning Report is incorrect in this matter. As indicated on the site plan, mobile fuel trucks will be used for fuelling of equipment and there will be no fuel storage on site. In addition, all fuel handling on site shall be done in accordance with applicable Technical Standards and Safety Authority ("TSSA") Standards and CBM's Best

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	Management Plans for Spills Control and Fueling Activities.	Management Practices. CBM has previously provided their Spills Control Plan to the Township but can do so again if required.
14.	It is also recommended that the applicant consider a Trucking Policy. This policy would address concerns related to truck movements and complaints from the public. A copy of the Trucking Policy should be provided to the municipality.	CBM has utilized similar policies in other situations and is open to developing such a policy for this application.
15.	The Planning Report should address the following policy of the PPS, 2020: <i>'2.5.3.2 Comprehensive rehabilitation planning is encouraged where there is a concentration of mineral aggregate operations.'</i>	<p>This is addressed through the details and conditions included on the Rehabilitation Plan. The proposed final landform takes into account surrounding land uses as well as approved rehabilitation plans for the other licences. Rehabilitation has occurred and continues to occur on other CBM licences along Concession 2 e.g. surrendered McMillan Pit, rehabilitation at Lenci Pit and McNally Pit, etc.</p> <p>CBM would like to meet with the Township to engage in discussions regarding future landforms and coordinated rehabilitation. This topic had previously been discussed at a high-level and CBM would like to re-engage on these discussions if the Township is open to it.</p>

Yours truly,
MHBC



Yara Elmahdy, BES



Neal DeRuyter, BES, MCIP, RPP