

## Instructions

### Instructions for Applicants under the *Aggregate Resources Act*

If there are any outstanding comments with respect to an application for an aggregate licence or an amendment to lower the depth of extraction from above to below the water table, after the applicant's attempt to address them, the applicant shall serve a summary of outstanding comment(s), a summary of the applicant's attempts to address the comment(s), and the applicant's recommendations to address the comment(s), on Part 1 of this form to any person who submitted a comment and has not withdrawn their comment. The applicant shall complete Part 1 of this form and send a copy to [ARAapprovals@ontario.ca](mailto:ARAapprovals@ontario.ca), or, if email is not available, Aggregates Section, Ministry of Natural Resources and Forestry, 300 Water Street, Peterborough ON K9J 3C7.

The Objection Form shall be served on commenters by courier, registered mail, personal delivery, or, by email if consented to by the commenter. Applicants that provide their email address on Part 1 of this form consent to the commenter returning the completed form by email.

### Instructions for Commenters

You have received this form because you submitted a comment to the applicant for an aggregate licence or for an amendment to lower the depth of extraction from above to below the water table and the Ministry of Natural Resources and Forestry during the consultation period and you have not withdrawn your comment. If you wish to file an objection to the application, you are required to complete Part 2 of this form and serve it on the applicant by courier, registered mail, personal delivery, or by email (if the applicant provided their email in Part 1), within 20 days of receiving the form. Send a copy of the completed form to the ministry. If there is not enough space provided, please attach a separate page with additional comments and recommendations. Any previous comments that have been submitted on an application are considered withdrawn if an objection form is not completed and sent within the 20-day deadline to both the applicant and the Ministry.

Please be aware that the Ministry of Natural Resources and Forestry may refer the application and outstanding objections to the Ontario Land Tribunal (OLT) for a decision. As an objector, you will be expected to participate in OLT case management conferences, mediation and/or hearings. Before filing an objection, you should understand the roles, responsibilities and expectations that may be placed on you by the OLT. The OLT may dismiss a proceeding without a hearing if they find the matter to be frivolous, vexatious or commenced in bad faith.

Please review the information on Part 1 and complete Part 2.

Return this Form to **both the Applicant** (at the address listed on Part 1) and send a copy to: [ARAapprovals@ontario.ca](mailto:ARAapprovals@ontario.ca) **or if email is not available, Aggregates Section, Ministry of Natural Resources and Forestry, 300 Water Street, Peterborough ON K9J 3C7.**

If you have questions, please contact:  
Ministry of Natural Resources and Forestry,  
Natural Resources Information and Support Centre (NRISC)  
300 Water Street  
Peterborough ON K9J 3C7  
Toll free: 1-800-667-1940

Fields marked with an asterisk (\*) are mandatory.

## Part 1: To be completed by the Applicant

Last Name *		First Name *		Middle Initial
May		Stephen		
Name of Business/Organization/Affiliation				
CBM Aggregates, a division of St. Marys Cement Inc				
Telephone Number		Mobile Number	Email Address	
647-637-6707 ext.			stephen.may@vcimentos.com	
<b>Mailing Address of Applicant</b>		<input checked="" type="checkbox"/> Canada <input type="checkbox"/> USA		
Unit Number	Street Number *	Street Name *		PO Box
	55	Industrial Street		
City/Town/Municipality *		Province *	Postal Code *	Country
Toronto		Ontario	M4G 3W9	Canada

Applicant Physical Address is same as above

### Proposed Aggregate Site / Existing Aggregate Site Location \*

(e.g. by lot and concession, local municipality, county or regional municipality, geographic township or territorial district)

6947 Concession 2, Puslinch, ON  
 Lot 18-20, Concession 1, Township of Puslinch, Wellington County

Application for a \*  pit  quarry  both  amendment (insert licence number)

### 20-Day Response Period

Start Date (yyyy/mm/dd) \* End Date (yyyy/mm/dd) \*

2026/02/24 2026/03/16

### Commenter Information

Last Name *		First Name *		Middle Initial
Hoytfox		Courtenay		
Name of Business/Organization/Affiliation				
Township of Puslinch				
Telephone Number		Mobile Number	Email Address	
519-763-1226 ext. 227			choytfox@puslinch.ca	
<b>Address</b>		<input checked="" type="checkbox"/> Canada <input type="checkbox"/> USA		
Unit Number	Street Number *	Street Name *		PO Box
	7404	Wellington Road 34		
City/Town/Municipality *		Province *	Postal Code *	Country
Puslinch		Ontario	NOB 2J0	Canada

**Table 1:** In the table below, please document the outstanding comment(s), one per row, your attempts to address them, and your recommendations to resolve them.

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
1. Concern that appropriate designation and zoning are not in place	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	Amendment applications have been submitted to the County and Township to redesignate and rezone the site to permit the pit operation. The applications have been deemed complete by the County and Township. Formal circulation and review of the planning applications is ongoing.

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
2. Concerns of consideration of application as a pit expansion	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	CBM has renamed the proposed pit to “Aberfoyle South Lake Pit”. The application continues to be assessed as a new pit application under the Aggregate Resources Act.
3. The effect of the operation of the pit on the natural environment	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	Changes made to site plan to incorporate additional mitigation measures for adjacent wetlands and significant natural features. A combined hydrological and natural environment monitoring plan has been developed which includes trigger thresholds and potential mitigation measures to address any unanticipated adverse impacts that may occur on the natural environment. Specific rehabilitation targets and thresholds for tree planting areas, and an increase in the area of wetlands being created through pit rehabilitation have been incorporated to the site plan.
4. The effect of the operation of the pit on the nearby residents	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	The proposed pit has been designed to minimize impacts on nearby residents in accordance with applicable standards and regulations. The proposed haul route from the site to the existing Aberfoyle South Pit includes only one house which is located adjacent to existing pit operations. The closest residences to the proposed pit were considered in the noise and visual impact assessments as well as the Dust Best Management Practices Plan. The site will be screened from public view due to the location of the extraction area, setbacks, berms and additional tree and vegetation screenings along Concession 2.
5. The suitability of the final rehabilitation plans for the site	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	The creation of a pond (26 ha), new wetlands (0.8 ha) and tree planting areas (6.7 ha) is suitable for the area and compatible with surrounding land uses including Mill Creek and nearby wetlands and woodlands.

<p style="text-align: center;"><b>A</b></p> <p style="text-align: center;"><b>Outstanding Comment(s) *</b></p>	<p style="text-align: center;"><b>B</b></p> <p style="text-align: center;"><b>Previous Attempt(s) to Address Comment(s) *</b></p>	<p style="text-align: center;"><b>C</b></p> <p style="text-align: center;"><b>Final Recommendation(s) to Address Comment(s) *</b></p>
<p>6. The possible effects on ground and surface water, including the potential impacts on Mill Creek and the associated provincially significant wetland</p>	<p>Refer to December 4, 2025 response package and responses through review of Planning Act applications.</p>	<p>The effects on groundwater are largely confined to the licence area and surrounding CBM owned property. An Enhanced Hydrological Monitoring Plan has been developed in response to comments received to verify that no unanticipated adverse impact occurs to groundwater, including trigger thresholds, and identifying potential corrective actions.</p> <p>The technical studies demonstrate that with the proposed mitigation measures, i.e. setbacks from the natural features and ongoing monitoring, there are no anticipated adverse impacts to Mill Creek. The Department of Fisheries and Oceans (DFO) has been consulted on the application relative to potential impacts to watercourses and fish habitat and have determined that the application is in compliance with the Fisheries Act.</p>
<p>7. The potential for impacts on adjacent agricultural operations</p>	<p>Refer to December 4, 2025 response package and responses through review of Planning Act applications.</p>	<p>The subject land is an isolated farm parcel that is primarily located within a floodplain. The subject lands are not identified as a prime agricultural area in the County's Official Plan. Truck traffic from the pit will be limited to using a 2 km stretch of Concession 2 which contains existing truck traffic.</p>
<p>8. The potential for impacts on the proposed haul route, including the provision for road improvements and a mechanism to ensure maintenance of the haul route as a result of gravel truck traffic on the municipal road network</p>	<p>Refer to December 4, 2025 response package and responses through review of Planning Act applications.</p>	<p>As agreed to through the Township's peer reviewer, a geotechnical investigation of Concession 2 and the Mill Creek culvert will be undertaken prior to pit operations in conjunction with the Township's planned improvements to Concession 2. The proposed haul route is limited to travelling east on Concession 2 from the proposed pit approximately 2 km to the processing plant.</p>

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
9. The determination of the quantity of aggregate on the site	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	Approximately 5.5 million tonnes of sand and gravel resources are found on the site. Testing of on-site sand and gravel resources has been conducted and confirmed that these materials can be used to produce granular products, and coarse and fine aggregates used in hot-mix asphalt paving and concrete production.
10. A comprehensive rehabilitation plan for licensed pits operated by the applicant (or its sister companies) in the local area	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	<p>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 Lanci 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>
11. The applicant's history of compliance with this Act and the regulations	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	CBM remains open to further discussions with the Township regarding compliance at its other licensed sites. Changes have been made directly in response to Township concerns.
12. Concern for depth of extraction	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	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 of no lower 285 masl. This approach optimizes the retrieval of resource along an irregular bottom surface.

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
13. Concern for the use of ecology and traffic studies older than 5 years in 2025	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	In response to comments received, additional and updated technical studies were undertaken including a Revised Transportation Impact Study, and assessments of potential impacts to adjacent natural features. Monitoring plans and mitigation measures have been developed to verify no adverse impacts occur to natural features, including trigger thresholds and identifying potential corrective actions; and to protect adjacent natural features.
14. Concern for flooding of site	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	Perimeter grading at a higher elevation of the final pit pond around the boundary of the extraction limit and a tile drain have been proposed to minimize potential flooding concerns. The Ministry of Environment, Conservation and Parks (Groundwater and Surface Water Branches) has reviewed the application and updated materials and has no remaining concerns with the project.
15. Concern of a virtual public meeting	Refer to December 4, 2025 response package and responses through review of Planning Act applications.	A virtual public meeting is permitted under the Aggregate Resources Act. CBM will consider the use of in-person public meetings for future ARA applications in the Township.

**Part 2: To be completed by the Commenter**

**Table 2:** In the table below, document any outstanding comment(s) and your recommendations for resolving it. If there is not enough space provided, please attach a separate page with additional comments and recommendations.

A Outstanding Comment(s)	B Recommendation for Addressing Comment
Please see attached letter.	

A Outstanding Comment(s)	B Recommendation for Addressing Comment

**Commenters note:** If you choose to participate in the *Aggregates Resources Act* notification and consultation process, all personal information you provide may be subject to the *Freedom of Information and Protection of Privacy Act* (FIPPA), whether provided to the Applicant and/or the Ministry of Natural Resources and Forestry at any point during the consultation process. The ministry collects your personal information under the authority of the *Aggregate Resources Act* and maintains it for the purposes of ensuring consultation and other requirements under the Act are met. Under the authority of subsection 11(2) or 13.1 (3) of the *Aggregate Resources Act*, your name and address will form part of the public record and will appear with your objection, unless you request in your submission that your name and address be kept **confidential**. If you have any questions about the collection and use of your personal information, please contact Ministry of Natural Resources and Forestry, Natural Resources Information and Support Centre (NRISC), 300 Water Street, Peterborough ON K9J 3C7. Toll free: 1-800-667-1940.

I hereby request that my name and address be kept confidential.

By signing and returning this form to the applicant and the Ministry of Natural Resources and Forestry, you acknowledge the following.

- I understand that, in submitting this form, I will be considered a formal objector to this application for a licence or to this amendment to lower the depth of extraction from above to below the water table. \*
- I understand that this application may be referred to the OLT and, as an objector, I will be required to participate in case management conferences, mediation and/or hearings held by the OLT. \*
- I understand that, if this application is heard by the OLT, some of my personal information may become public under the *Tribunal Adjudicative Records Act* (TARA). \*

Signature of Objector

Date (yyyy/mm/dd)

2026-03-16

2026-03-16 14:59:02 EDT

**Part 2: To be completed by the Commenter**

**Table 2**

<p style="text-align: center;"><b>A</b> <b>Outstanding Comment(s)</b></p>		<p style="text-align: center;"><b>B</b> <b>Recommendation for Addressing Comment</b></p>
<p><b>1.</b></p>	<p>Concern that appropriate designation and zoning are not in place</p>	<p>Amendment applications (OPA and ZBA) were recently deemed complete but there has been no public meeting scheduled for these applications and a decision on the merits of the applications has not been rendered by the respective councils at this stage. Additional technical review is required by the Township and the County.</p>
<p><b>2.</b></p>	<p>Concerns of consideration of application as a pit expansion</p>	<p>The applicant has acknowledged that this is not a pit expansion but rather a new pit application. The Township has no concerns with the proposed name of the pit – Aberfoyle South Lake Pit.</p>
<p><b>3.</b></p>	<p>The effect of the operation of the pit on the natural environment</p>	<p>Significant concerns have been expressed by the Township hydrogeologist with respect to impacts on the groundwater table. Additionally, the Township ecologist has identified several technical concerns that remain outstanding regarding potential impacts to the natural environment. These include uncertainty regarding groundwater impacts to Mill Creek and the Provincially Significant Wetland, limitations in the spatial extent of ecological field investigations, uncertainty in wetland and fish habitat impact assessments, potential loss of hydrologic functions associated with headwater drainage features, and insufficient justification for several ecological conclusions. Additional concerns have been noted by the Township ecologist regarding monitoring commitments, mitigation measures and the adequacy of baseline ecological data. Concerns from the Township engineer regarding offsite flooding and the proposed mitigation plan to control flooding have been expressed and remain unresolved.</p>
<p><b>4.</b></p>	<p>The effect of the operation of the pit on the nearby residents</p>	<p>Concerns remain with respect to the potential for impacts on the nearby residents. These impacts include negative effects on private lands with treed swamps and associated wildlife habitat. In</p>

		addition, the potential for flooding nearby private lands has been identified as a concern.
<b>5.</b>	The suitability of the final rehabilitation plans for the site	Concerns regarding the suitability of the rehabilitated site (a lake) have been expressed by the Township development review team. Concerns have been raised regarding the long-term mitigation required to minimize flooding on neighbouring property. Concerns have been raised regarding the permanent drawdown of the water table in the area north and northeast of the proposed lake and increase in water table south and southwest of the lake.
<b>6.</b>	The possible effects on ground and surface water, including the potential impacts on Mill Creek and the associated provincially significant wetland	Significant concerns have been expressed by the Township hydrogeologist with respect to impacts on the groundwater table. The Township ecologist has raised concerns regarding the groundwater modelling results and their implications for Mill Creek, tributaries, and the associated Provincially Significant Wetland. Concerns include potential groundwater level changes across different areas of these systems, possible baseflow alterations, lack of field data across the full area of predicted groundwater influence, and uncertainty regarding how wetland hydrologic changes may influence downstream flows and fish habitat. Additional concerns have been noted by the Township ecologist regarding monitoring commitments, mitigation measures and the adequacy of baseline ecological data. Concerns from the Township engineer regarding offsite flooding and the proposed mitigation plan to control flooding have been expressed and remain unresolved.
<b>7.</b>	The potential for impacts on adjacent agricultural operations	Agricultural impacts have not been fully examined through an Agricultural Impact Assessment that conforms to the County of Wellington Official Plan policy 4.6.5 and incorporates relevant analysis and impact assessment as set out in OMFA Publication 861 (AIA Guidelines).
<b>8.</b>	The potential for impacts on the proposed haul route, including the provision for road improvements and a mechanism to ensure maintenance of the haul route as	The Township remains concerned that the proposed haul route will be negatively impacted by the Aberfoyle South Lake Pit. A portion of the proposed haul route is not a truck route, and a geotechnical

	a result of gravel truck traffic on the municipal road network	investigation is required to be completed by the applicant to determine existing pavement and base structure and condition and determine recommendations for required upgrades. In addition, structural testing/inspection of a culvert located along the proposed haul route is to be completed to confirm if it is suitable for the anticipated loads as is, or what upgrades would be necessary to have it meet the future required level of service. A comprehensive structural investigation including soil bearing capacity testing, concrete and rebar testing, and bridge deck inspection, is required. Sightline analysis is required for each proposed access.
<b>9.</b>	The determination of the quantity of aggregate on the site	The Township's development review team remains concerned that the determination of the quantity of aggregate does not coincide with the extraction limits in depth of the proposed pit.
<b>10.</b>	A comprehensive rehabilitation plan for licensed pits operated by the applicant (or its sister companies) in the local area	The Township remains concerned with the status of several existing licenced pits operated by the applicant. Several of these pit licences show little progress with rehabilitation and the rehabilitation plans for these sites are not coordinated. CBM has not requested a meeting with the Township to address these concerns.
<b>11.</b>	The applicant's history of compliance with this Act and the regulations	There are concerns with the anticipated silt load at the receiving Pit (McNally Licence No. 5497 – "McNally") and the noncompliance with the McNally site plans that are anticipated should this (and other proposed pits in the immediate vicinity) be approved. See the covering letter, Schedule "A" for an itemized summary of some of the Township's primary compliance concerns.
<b>12.</b>	Concern for depth of extraction	The Township's development review team remains concerned that the determination of the quantity of aggregate does not coincide with the extraction limits in depth of the proposed pit.
<b>13.</b>	Concern for the use of ecology and traffic studies older than 5 years in 2025	This remains a concern. The Township ecologist notes that several baseline studies have not been updated since being originally completed in 2018 and the supporting technical data may no longer reflect current conditions. Where these

		uncertainties exist, these studies should be updated to ensure the impact assessment is based on current conditions.
<b>14.</b>	Concern for flooding of site	The proposed mitigation plan to control flooding is not satisfactory to the Township. Potential for offsite impacts on the Natural Environment and private lands remains a concern. In particular, the Township ecologist notes that the downstream receiving waterbody and associated tributary system have not been adequately assessed to determine how changes in drainage patterns and flow contributions resulting from the proposed flood mitigation may affect channel stability, hydrology, and associated fish habitat. Additional evaluation is required to demonstrate that the proposed flood mitigation measures will not result in unintended downstream impacts to the aquatic system. Preliminary operational grading plans and associated flood maps need to be provided to better demonstrate how perimeter grading and berms will mitigate flooding. Additional modelling of the proposed tile drain is required to better demonstrate long term impacts of groundwater and surface water both on and offsite. There are also concerns about the long-term operation and maintenance of the tile drain, which need to be addressed.
<b>15.</b>	Concern of a virtual public meeting	Resolved.
<b>16.</b>	Visual Impact concerns	A detailed landscape plan/details has not been provided by the applicant at this time. A scaled cross-section of Concession 2, berm, and remediation plantings should be provided to visually demonstrate the extent of visual impact mitigation
<b>17.</b>	Air quality concerns	No specific air quality study or assessment was completed for the application. Typically, an air quality study would be submitted, and the results of the air quality study would include the detailed Dust BMPP.



March 16, 2026

Canada Building Materials (CBM) Aggregates, a Division of St. Marys Cement Inc. (Canada)  
Aggregates Division  
55 Industrial Street  
Toronto, ON M4G 3W9  
Attn: Stephen May, Lands Manager – Western Region  
Attn: Andreeanne Simard, Director of Lands, Resources and Environment  
EMAIL: [stephen.may@vcimentos.com](mailto:stephen.may@vcimentos.com); [andreeanne.simard@vcimentos.com](mailto:andreeanne.simard@vcimentos.com)

Ministry of Natural Resources and Forestry  
Aggregates Section  
300 Water Street  
Peterborough, ON K9J 3C7  
EMAIL: [ARAapprovals@ontario.ca](mailto:ARAapprovals@ontario.ca); with a copy to: [Jason.mclay2@ontario.ca](mailto:Jason.mclay2@ontario.ca)

(delivered by email)

RE: Objection Letter to Canada Building Materials (CBM) Aggregates, a Division of St. Marys Cement Inc. (Canada) regarding the proposed Aberfoyle South Pit Expansion, Part of Lots 18-20, Concession 1, Township of Puslinch, County of Wellington, *Aggregate Resources Act* Licence Application #626630

Dear Mr. May, Ms. Simard, and Mr. McLay:

The Township of Puslinch (“the Township”) maintains its Objection to the Class A Licence application for a proposed Licence at Part of Lots 18-20, Concession 1 in the Township of Puslinch, now proposed to be named the CBM Aberfoyle South Lake Pit. The Township recommends that this matter be referred to the Ontario Land Tribunal unless the Township advises the MNR that the applicant has satisfactorily addressed the issues that remain outstanding of the date of this letter.

This letter is being provided by email in accordance with the direction provided in the Objection Form approved by the Ministry of Natural Resources and Forestry (“Ministry”) and in response to the application serving Part 1 on the Township on February 23, 2026. Hard copies will follow by courier. As the comment period has now closed, the Township respectfully requests that the Environmental Registry posting be updated to include the



Township's objection letter and appended comments for the public record. The Township's formal responses on the Objection Form (Part 2, Table 2) are enclosed herewith, together with peer review comments that are available as of this date. As the Township's peer reviewers are also engaged on the parallel *Planning Act* applications, which were only just deemed complete on January 21, 2026, certain updated peer review comments are not available on the truncated timelines required by the ARA approvals process.

In its review (including peer reviews) of the updated documentation provided by the applicant, the Township has identified numerous outstanding concerns with the application. The application in its current form does not have appropriate regard for the matters listed in section 12 of the *Aggregate Resources Act* ("Act"). Primarily the Township's Development Review Team has identified concerns related to the following:

- a) The effect of the operation of the pit on the natural environment: In particular, the proposed pit is surrounded by Provincially Significant Wetlands, as well as Mill Creek and tributaries, which are cold water streams. The applicant has not yet demonstrated how impacts (including cumulative impacts) on these systems can be appropriately mitigated;
- b) The effect of the operation of the pit on the nearby residents: Water table increases are proposed to be contained by a berm and tile drain, which will require perpetual maintenance to prevent significant flooding events to private property;
- c) The suitability of the final rehabilitation plans for the site, including concerns about permanent lowering of the water table in the north-northeast vicinity of Mill Creek, with flooding concerns to the south/west of the site;
- d) The possible effects on ground and surface water, including the potential impacts on Mill Creek and the associated provincially significant wetland;
- f) The potential for impacts on the proposed haul route, including the provision for road improvements and a mechanism to ensure maintenance of the haul route as a result of gravel truck traffic on the municipal road network;
- g) The quality and quantity of aggregate on the site (and the land of justification that enough high-quality aggregate exists to justify the substantial permanent alteration to the water table);
- h) The applicant's history of compliance with this Act and the regulations (as further detailed below); and
- i) A lack of comprehensive rehabilitation plan for licensed pits operated by the applicant (or its related companies) in the local area.



The details of how and why the above noted criteria have not been satisfied at this time are outlined in further detail in the enclosed Table 2 response, with fulsome discussion in the peer review reports enclosed herewith and available as of the filing deadline for this objection.

Without limiting the generality of the foregoing, the Township has identified the following concerns, which are briefly summarized below, and should not be construed as in any way limiting the scope of the responses in Table 2 enclosed, and as further detailed in the comprehensive peer review reports that the Township has received from its consultant team:

1. The excavation plan is deeper than the extraction depth as reported in the WSP Aggregate Resource Evaluation;
2. The proposed licensed area is larger than necessary for the extraction, vehicle access/locating and associated mitigation features (berms). In particular, it is unclear why the proposed licensed area extends toward Concession Road 2 in the northwest portion of the proposed licence;
3. Certain data provided by the applicant remains outdated as of 2026 and needs to be updated, including baseline ecological survey data;
4. The significant potential for the site pond to flood and the mitigation method proposed to resolve flooding requires perpetual maintenance. Concerns remain with respect to the proposed tile drain and confirmation is required that the downstream receiving watercourse has been evaluated to ensure it can accommodate the projected increase in flow without resulting in channel instability, excessive erosion, or downstream impacts;
5. The potential for groundwater draw down from the proposed extraction to impact significant wetlands and fish habitat, particularly with respect to Brook Trout;
6. There will be permanent increases to water levels on private property between the proposed Pit and Mill Creek, and permanent decreases in water levels north of Concession 2, the impacts of which have not been adequately addressed;



7. Likewise, the impacts to Mill Creek, the surrounding Provincially Significant Wetland, and associated significant wildlife habitat have not been adequately addressed at this time;
8. The impact of silt load on the receiving pit McNally Licence #5497 (“McNally”) that is proposed to facilitate all processing from the proposed Lake Pit requires further analysis (including capacity analysis for silt at McNally);
9. The Township’s consulting engineer (GEI) has identified the need to do a detailed geotechnical investigation of Concession Road 2, from the entrance of the proposed Lake Pit easterly to the proposed processing (receiving) McNally Pit, including investigation of an existing culvert. GEI requires further information on how truck weights will be determined in the absence of a weigh scale to prevent overloading of the road/pavement and culvert along the haul route;
10. Cumulative impacts of the myriad of pits along and adjacent to Concession Road 2 have not been considered, nor has comprehensive rehabilitation been considered by the applicant as per 4.5.3.2 of the Provincial Planning Statement, 2024 where there is a concentration of aggregate operations;
11. Agricultural impacts have not been fully explored through an Agricultural Impact Assessment that conforms to County of Wellington Official Plan policy 4.6.5 and incorporates relevant analysis and impact assessment as set out in Ontario Ministry of Agriculture and Food (“OMAF”) Publication 861(AIA Guidelines);
12. The Site Plan operational notes should preclude importation of fill other than as necessary for berm construction. The applicant should document the volume of available soil onsite that could be used for berm construction before any excess soil is permitted to be imported. Further, no excess soil should be permitted to be imported to assist in the progressive or final rehabilitation of the pit as the pit is proposed to be returned to a lake with ecological features;
13. In terms of the Act s.12(j) criterion (history of compliance), the Township has identified various ongoing concerns at other CBM pits in the immediate vicinity along Concession Road 2 as well elsewhere in the Township (as detailed in the enclosed



Schedule “A” to this letter). To date, despite raising these concerns with the Ministry, no substantive response has been received as to how the applicant or Ministry is addressing these compliance concerns;

14. The Site Plans contain no proposal for truck weigh scales, leading to concerns about how annual tonnage is calculated and reported to TOARC;
15. The Township remains concerned about the quality and quantity of the aggregate material, as compared to the extraordinary permanent impacts on the natural environment that will result from extraction, as well as the permanent loss of high quality agricultural lands. As presently proposed, the benefits of extraction are significantly outweighed by the negative effects on the environment and surrounding community; and
16. The applicant’s noise study requires further elaboration to explain how impacts will be mitigated.

The Official Plan Amendment and Zoning Bylaw Amendments for the application have not been approved and, more to the point, these related applications have only recently been deemed complete and the *Planning Act* process, including public participation and a statutory Public Meeting, will not be scheduled before the two-year time limit on the ARA process having been concluded.

Effectively, the Township has been placed in a disadvantageous position by the timing of the ARA proposal. At this stage, the Township considers the proposition of a pit at the subject location to be premature and in its current form, does not constitute good planning and is not in the public interest, consequently, it should not be approved at this time.

Please note that the concerns outlined in this letter represent the results of the review completed thus far by the Township’s Development Review Team. It is anticipated that, prior to the hearing, the applicant will present additional studies, including additional field work. The Township reserves the right to identify further concerns, to provide more detail, and to provide additional recommendations for the resolution of any concerns identified as the review of this application continues.



Should you have any questions, please contact the undersigned

Sincerely,

Courtenay Hoytfox  
CAO  
Township of Puslinch

Cc: Meagan Ferris Manager of Planning and Environment, County of Wellington  
Neal DeRuyter, MHBC  
SmithValeriotte Law Firm LLP, external legal counsel for the Township

Encl.

1. Completed Objection Form
2. Harden Environmental Comments, dated March 3, 2026
3. GEI Comments, dated March 6, 2026
4. Valcoustics Comments, dated March 11, 2026
5. Landmark Environmental Group Limited Comments, dated March 10, 2026
6. Vooren Air Quality Management Services Inc. Comments, dated February 12, 2026
7. Aboud & Associates Inc. Comments, dated March 16, 2026



## SCHEDULE "A"

### Ongoing Compliance Issues at other CBM Pits

#### License 5491 (McNally)

- Site note 9 states there shall be no offsite discharge of water. The processing plant is discharging water to another licence.
- There is an ongoing site plan contravention as the silt pond is not located operationally where identified on the site plan.
- The site license speaks to blending in site note 9, further listing crushing and blending as two separate permissions along with several other operations.
- Site note 9 it further indicates that material from other sites may be used for blending but does not reference crushing or the other permitted uses mentioned earlier. This reinforces that that blending is a stand alone activity that was not intended to permit the importation of raw material from other sites to be crushed/washed, etc.,
- CAR report from 2023 indicates importing of material for processing, contrary to site plan permissions for blending
- No extraction is occurring, but no indication of if/when site closure and final rehabilitation will occur, undermining premise of extraction being an 'interim' land use.
- Aerial imagery shows a trench around the primary silt pond. While the Township is supportive of this revision to the site plan and installation, it is understood that the MNR has not yet approved this site plan amendment and is awaiting certain MECF approvals. Notwithstanding this pending amendment, CBM has moved ahead with trench installation.

#### License 5520 (Aberfoyle)

- The silt ponds are located where ponds are indicated on site plan / operational plans both north and south of HWY 401.
- The operation plan indicates disturbed areas where the ponds are located on north portion of licence. The operational plans show disturbed area south of the 401 where the ponds exist and shows ponds where satellite imagery shows silt ponds.
- Site Plan note 9 identifies blending as a separate permission from crushing and processing.
- Site Plan note 13 indicates off site material may be used for blending or custom products, does not list the similar permissions in site note 9 making crushing and/or washing not permitted.



#### License 5737 (McMillan)

- Fish hatchery containers located within 30 meters of the pond – not in compliance

#### License 17600 (Mast)

- Site Notes refer to wash plant. Water will be circulated on site is not be exported to McNally for processing. This site is out of compliance if exporting.
- Site note 16 states material may be brought in for blending only. Liberal use of blending to process aggregate from neighbouring sites
- Importation of fill is permitted to obtain a 3:1 slope only, MNRF has not responded to confirm that no excess soil is being brought in.
- West face remains to be rehabilitated. Deferral premised on 'Big Lake project', which is not a project, but a decades-old high-level proposal that has never been actively pursued.

#### License 129817 (Mast-Snyder)

- Satellite imagery does not match site plan.
- The site is out of compliance if it does not have a processing plant and all material is being shipped off site, which was not considered when licence was approved.

#### License 625189 (Roszell)

- The Township has significant concerns with this pit that resulted in extraction activities ceasing for a period of time.
- The concerns raised by the Township Hydrogeologist have not been adequately addressed by the pit operator nor has adequate enforcement action been taken by the MNRF.
- Silt barrier is not working as designed.
- No processing equipment on site, so it is unclear where the 750 000 tonnes are being processed?



Harden Environmental Services Ltd.  
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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

March 3, 2026

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

Attention: Monika Farmcombe  
Development and Legislative Coordinator

**Re: Review of 3<sup>rd</sup> Submission  
CBM Aberfoyle South Expansion, Puslinch, Ontario**

Dear Monika,

We continue to have several broad issues with the information provided. Our issues remain as originally stated in italics and we have updated our comments immediately following.

#### **Silt Deposition at Aberfoyle Main Pit (South of Hwy 401)**

*The proposed operations include aggregate processing at the McNally Pit (License 5497) with deposition of fine-grained material possibly into the Aberfoyle Main Pit (5520). The area designated for silt deposition in the Aberfoyle Main pit also is used for deposition of silt from the Neubauer and Lanci Expansion. CBM has a history of depositing silt in areas not designated for silt ponds at this location. A detailed analysis of ongoing and future sediment deposition needs must be prepared, and the appropriate areas designated for sediment disposal. Potential hydrogeological and ecological impact assessments for the areas designated for silt disposal below the water table must be made, verification monitoring undertaken and mitigation measures identified unless deposition is done in a hydrologically benign manners, such as creating an island within an existing body of water.*

We note that attachment #1 was prepared in January 2024 and this the first time it has been introduced to Harden Environmental. We look forward to evaluating this report along with any major site plan amendment required for the McNally Pit to allow for the proposed changes.

## **Cumulative Impact of Multiple Aggregate Operations and Major Groundwater Abstractions**

*A cumulative impact assessment of ongoing aggregate extractive activities in this area of intensive aggregate operations has not been prepared or presented. A cumulative impact assessment including all groundwater abstractions from Permitted water taking, aggregate extraction from below-the-water-table and deposition of sediment below the water table must be included. The cumulative impact assessment must also include a detailed water balance of the cumulative impact of increased evaporation in this area from converting farmland to open bodies of water. Mill Creek should not be assumed to be a hydrologic boundary to the effects of below water table extraction, particularly when up to four metres of drawdown are being predicted.*

Considering the proposed Safarik Pit has already prepared a groundwater model to the east of Mill Creek and the Aberfoyle South Pit model includes areas north and west of Mill Creek, we recommend that the models be combined to allow for a wholistic look at below water table extraction in this area. We recommend that the model boundaries be extended southward to where Fletcher and Spencer Creek emerge along the base of the Galt Moraine.

### **Localized Impact to Private Property**

*The proposed pit is surrounded by private property as shown on Figure 1. It is clear throughout the reporting that there will be impacts on both groundwater movement and groundwater elevations beyond the applicant's property lines. For example, all groundwater movement from the CBM property will cease between the proposed lake and Mill Creek along a 1600 m stretch of Mill Creek as shown in the particle tracking exercise. Groundwater levels beneath properties north and south of the CBM owned lands will decrease (east half of site) and groundwater levels beneath properties south and west of the CBM lands will increase (west half of site). There is also the potential for annual seasonal overland flow from the proposed lake onto private lands. The concerns of the private landowners must be addressed. A significant portion of both Mill Creek and Tributary 3 that could be impacted are on private property. To our knowledge no assessment has been made on these private lands.*

The proposed drain along the west side of the pit may improve the flooding in the neighbouring property, however, this needs verification monitoring. This is also a permanent solution requiring perpetual maintenance. Additional water will be flowing down Tributary #3 from the drain and impacts will have to be assessed both ecologically and engineering (e.g. culvert sizes downstream). There will be a permanent increase in water levels on private property between the proposed pit and Mill Creek (Zones 3 and 4 of PSW mapping). There will be permanent decreases in water levels north of Concession II Road in PSW zones 1 and 5 and between. We rely on the Township's ecology consultants to confirm assess the potential impact on these private properties.

### **Direct Impacts to Mill Creek Within the Area of Influence of the Pit**

*There is a significant reach of Mill Creek that will either have reduced or eliminated groundwater discharge from the west and or north shore because of the proposed below water table mining. South and west of where Mill Creek passes beneath Concession 2 Road, approximately 1600 metres of shoreline will have between 92% and 100% of natural groundwater discharge diverted from Mill Creek to the proposed lake. This area of Mill Creek is an important fishery as we have learned through the work commissioned by the Department of Fisheries and Oceans and work done for the Grand River Conservation Authority. The direct impact of this groundwater flow reduction to Mill Creek has not been adequately described, other than in a general way calculated as a percentage of total upstream baseflow reduction.*

We are not satisfied with the Attachment #3 as this only addresses the cumulative change in baseflow downstream of the proposed pit. Groundwater flow to Mill Creek through PSW Zones 1 and 2 will cease. This is not quantified in the reports.

### **Impacts to the Mill Creek Puslinch Provincially Significant Wetland**

*The reporting provided in Appendix G, Groundwater Model of the Water Report clearly identifies areas where there will be both temporary and permanent groundwater level reductions and groundwater level increases. These extensive areas are not identified in the Natural Heritage Report assessment. There are three main areas where the Natural Heritage Report hydrological assumptions do not correlate to the findings of the Groundwater Model.*

- 1) The Natural Heritage report states that there will be no groundwater level impact beyond 120 m whereas the Groundwater Model indicates impacts occurring at a distance greater than 720 m.*
- 2) The Natural Heritage report states that there will be up to 489 mm/year of additional groundwater discharge to the Mill Creek Puslinch Provincially Significant Wetland south of the proposed lake whereas the model shows that the PSW in Zone 2 will have a significant decrease in groundwater discharge. This is the same area that groundwater flow will be eliminated.*
- 3) The Natural Heritage report states that that the rise in water levels in the southwest area will not change water availability to the wetland. The groundwater model predicts a rise of up to 0.9 m in the southwest corner of the site significantly reducing the thickness of the unsaturated zone and greatly increasing the volume of groundwater discharge. There will be a significant increase in water availability in this area that has not been addressed. The final estimated lake level of 302 m AMSL does not represent the highest possible seasonal water level. With ground surface elevations of 302 m AMSL and no mitigation measures shown on the site*

*plans, the lake will overflow every year resulting in excess surface flow onto the adjacent private lands.*

We are relying Aboud and Associates to comment fully on the wetland impacts. We have created Table 1 based on information provided that was provided to us and this summarizes changes in total hydrological support as well as just groundwater support.

### **Impacts to On-Site Tributary 3**

*The surface water catchment area for Tributary 3 will be reduced. There will also be a permanent decline in groundwater levels beneath Tributary 3 leading to a reduction in baseflow. It is estimated that there will be a permanent 52% reduction in baseflow to Tributary 3. A referral to the DFO has been made and we recommend that our detailed comments and those of Aboud and Associates are also sent to the DFO. The groundwater model only simulates a steady state solution calibrated to, presumably, an average condition and drought conditions will result in even lower levels of the water table adjacent to and beneath Tributary 3. It is known that the flow in Tributary 3 varies considerably seasonally, but generally has baseflow throughout the year. The flow in Tributary 3 should be evaluated in a holistic manner including seasonal surface water and groundwater inputs in order to assess long term impacts.*

We have made Aboud and Associates aware of the potential changes in hydrological support to Tributary #3 which includes less groundwater discharge in the upper reaches near to Concession Road II, permanent discharge of water from the drain, and in general more water in downstream reaches.

### **Flood Control**

*The potential for flood control will be reduced at the site because of the creation of a large single pond. The pond will allow for instantaneous transfer of hydraulic potential from upstream end of the site to downstream edge. The proposed lake level (302 m AMSL) at the downstream edge will already be very close to, if not above the original ground surface. The site plans show a wetland at 301 m AMSL in very close proximity to the proposed lake in the southwest area. The groundwater model is calibrated to an average condition, not a high level or low-level condition. Therefore, assuming similar fluctuations in the pond level as observed at other nearby pit ponds, the water level in the spring of the year, could be 0.5 to 0.75 higher and overflow from the lake will be an annual event under normal conditions, let alone flood conditions. This has implications for adjacent wetland hydrology and private properties.*

We refer flood control to GEI Consultants to comment.

## Groundwater Model

*There are numerous concerns with the applicability, accuracy and total reliance upon results of the groundwater model as indicated in the following section of this report.*

*For these reasons, it is our opinion that the information provided is not sufficient to be accepted for a complete application.*

*We have the following specific comments on the technical reports. Given the integration of the natural heritage discipline and hydrogeology, we have provided comments on the natural heritage report where hydrogeology is mentioned.*

Our detailed comments are found in the attached response table. It is our recommendation that CBM take the opportunity to create one model for the Aberfoyle South Lake Pit and the Safarik Pit to evaluate cumulative hydrological impacts from all extractive operations along Concession 2 Road.

## Closure

We have attached our detailed comments in table form and will provide an excel spreadsheet with the comments upon request.

We appreciate the opportunity to provide these comments. Other comments may arise as additional information about the site is provided. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully Submitted,

Harden Environmental Services Ltd.



Stan Denhoed, M.Sc., P.Eng.  
Senior Hydrogeologist  
(519) 826-0099  
[sdenhoed@hardenv.com](mailto:sdenhoed@hardenv.com)



Encl:  
Figures 1 to 3  
Table 1  
Comment Table

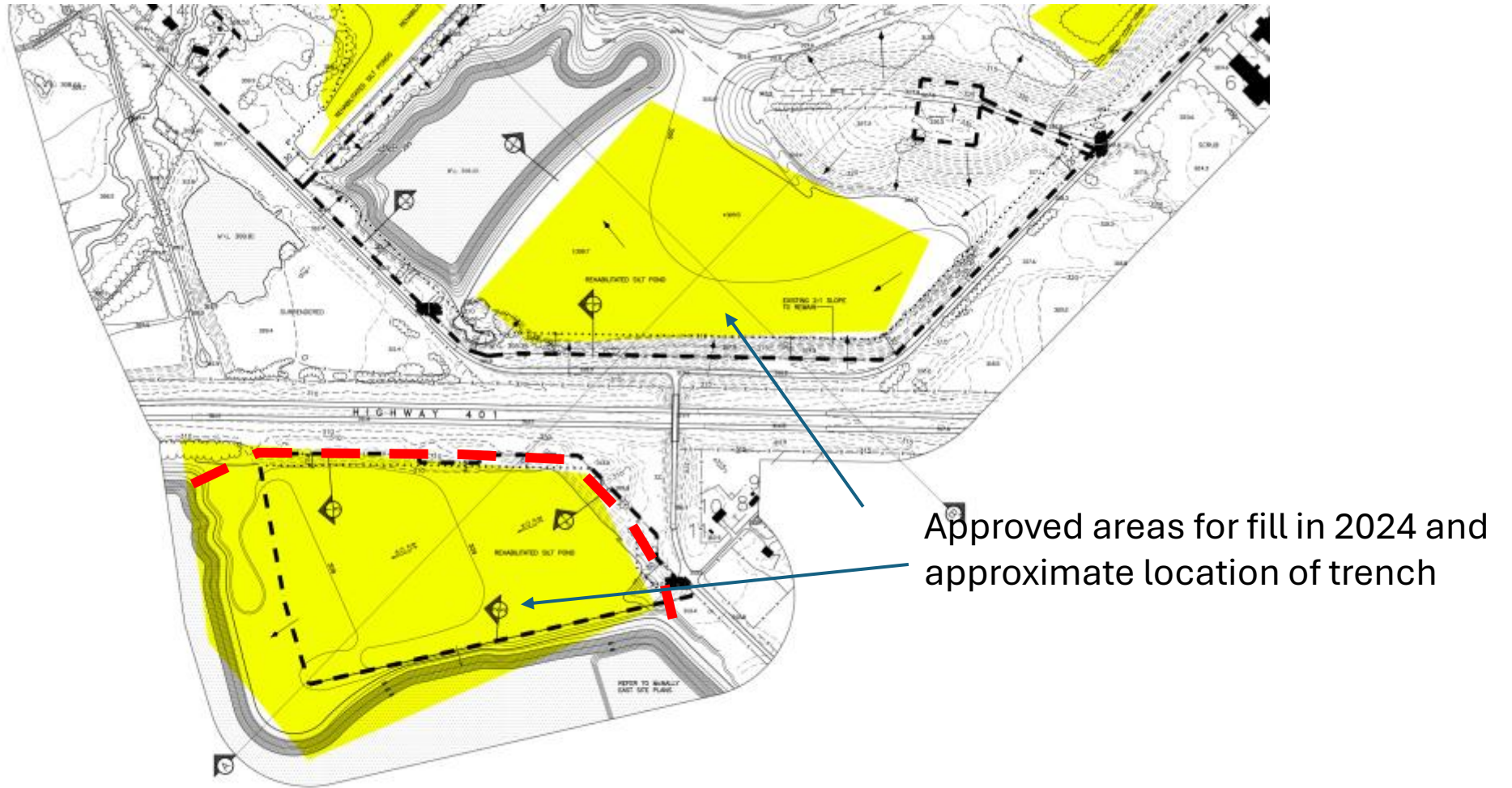
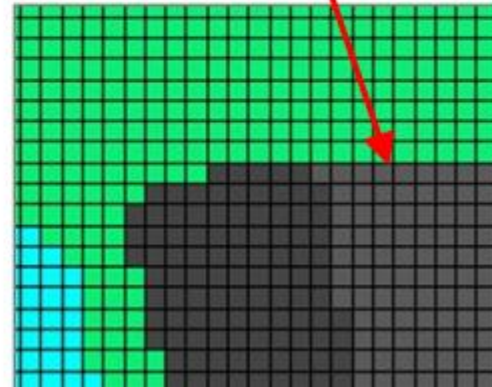


Figure 1



Figure 2

McNally Pond  
Silt Zones



Source:

## Potential Effects of Silt Deposition in the McNally Pond on Mill Creek Baseflow

*CBM McNally Pit - Aberfoyle Operations*

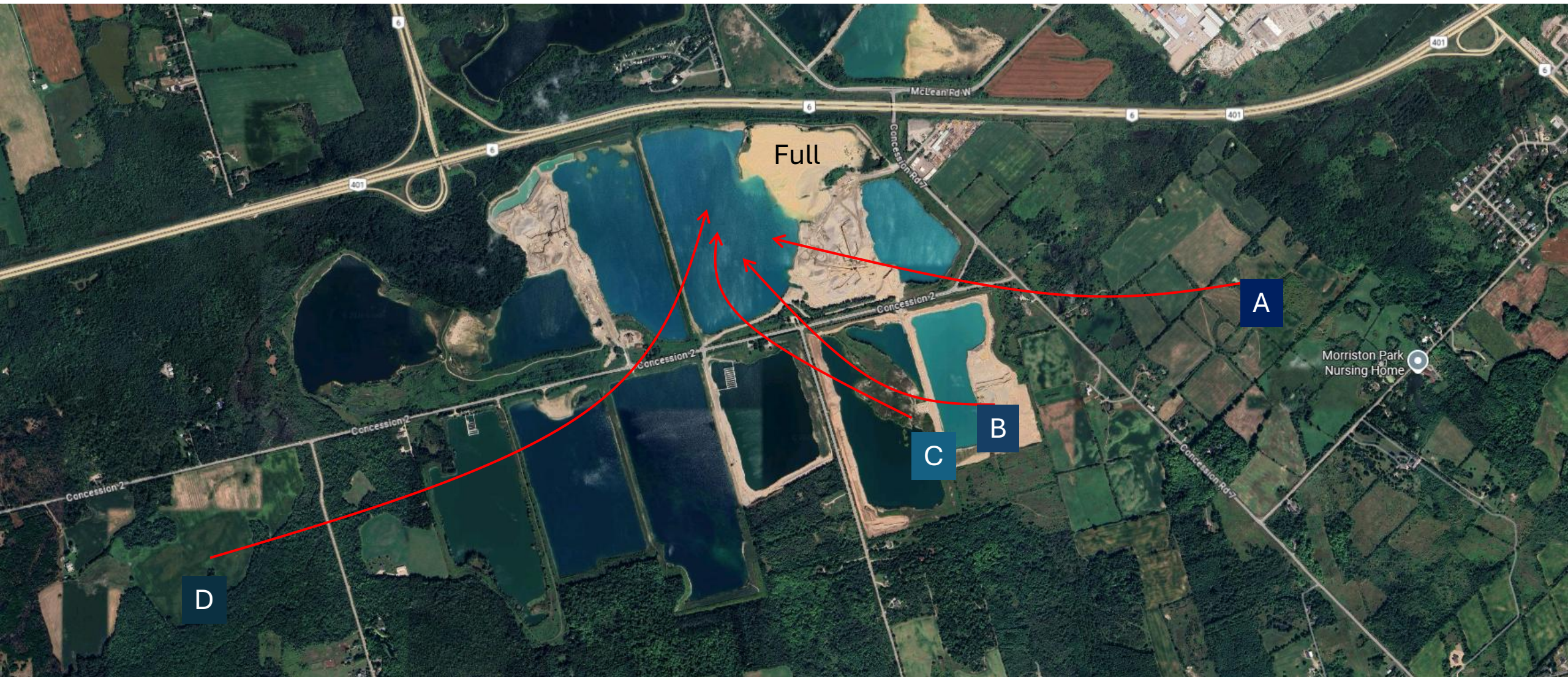


Figure 3

Zone	Pre Pit Gw Discharge (mm/year)	Pre Pit Surplus (mm/year)	Pre Pit Total Input (mm/year)	Post Pit GW Discharge (mm/year)	Post Pit Surplus (mm/year)	Post Pit Total (mm/year)	% Change in Groundwater Discharge Pre to Post	% Change in Total Contribution Pre to Post
1	164	276	440	65	276	341	-60	-23
2	266	276	542	155	276	431	-42	-20
3	142	276	418	311	276	587	119	40
4	413	276	689	671	276	947	62	37
5	174	276	450	0	276	276	-100	-39
6	768	276	1044	885	276	1161	15	11
7	816	276	1092	1326	276	1602	63	47
	a	b	a + b	c	b	c + b	$(c - a) / c * 100$	$(c + b) / (a + b) * 100$

a Source October 21, 2025 #4 Supplemental

b Source: Table 15 Water Report November 2023- Forested Swamp

c Source October 21, 2025 #4 Supplemental

This analysis does not include runoff entering the wetland from adjacent lands. Where no extraction is occurring, this will not change. Where extraction is occurring, any runoff from the extraction area will cease. This may affect zones 2,3,5 and 6 which have lands adjacent to the pit.

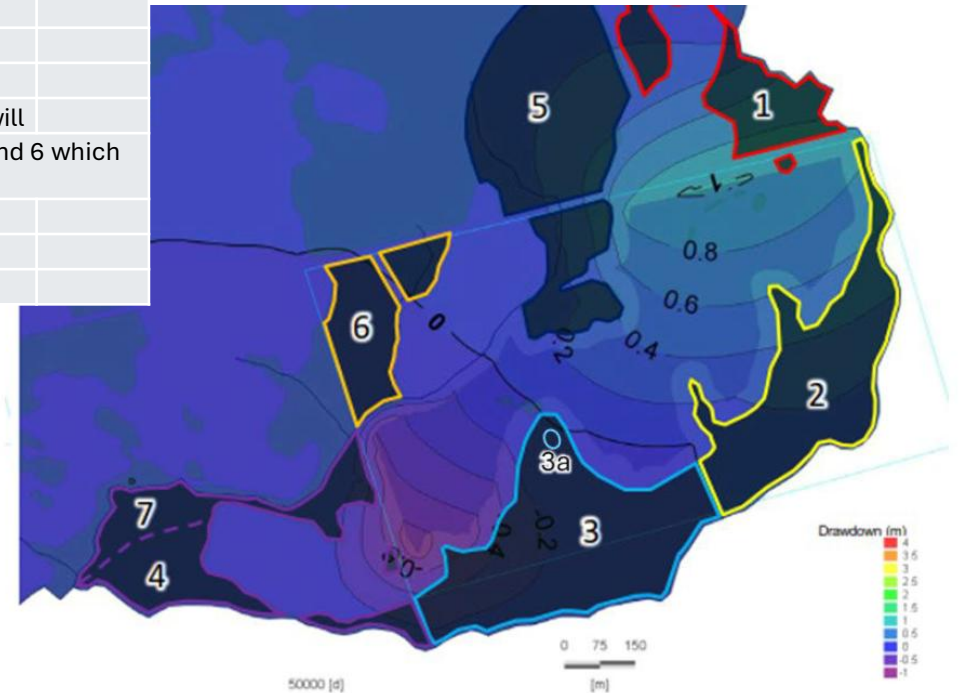


Table 1

Comment	Response March 2026	Issue
2	We disagree. This site, and other aggregate extractions adjacent to Mill Creek represent the greatest potential hydrologic impact to Mill Creek. All other takings from deeper aquifers (including that of the former Blue Triton Well, the increased taking in the Cambridge East Wells and increased taking by the City of Guelph) are farther away, do not take directly from the water table aquifer and yet are also shown to have an indirect impact to Mill Creek. The creek is shown time and time again to have a healthy population of brook and brown trout, two species sensitive to water quality and quantity. This is particularly true for the reach of the creek adjacent to this site, upgradient of this site (in the halo of the area of influence) and downgradient of this site. The Township is presently in discussions with Wellington County Source Water Protection to convene a water resources group to discuss the overall cumulative impact to Mill Creek from all sources. It is imperative that we understand where the proposed impact to Mill Creek by this extraction fits into that larger cumulative picture.	Cumulative Impact
33	We disagree. This site, and other aggregate extractions adjacent to Mill Creek represent the greatest potential hydrologic impact to Mill Creek. All other takings from deeper aquifers (including that of the former Blue Triton Well, the increased taking in the Cambridge East Wells and increased taking by the City of Guelph) are farther away, do not take directly from the water table aquifer and yet are also shown to have an indirect impact to Mill Creek. The creek is shown time and time again to have a healthy population of brook and brown trout, two species sensitive to water quality and quantity. This is particularly true for the reach of the creek adjacent to this site, upgradient of this site (in the halo of the area of influence) and downgradient of this site. The Township is presently in discussions with Wellington County Source Water Protection to convene a water resources group to discuss the overall cumulative impact to Mill Creek from all sources. It is imperative that we understand where the proposed impact to Mill Creek by this extraction fits into that larger cumulative picture.	Cumulative Impact
52	We are of the opinion that a cumulative impact assessment is necessary to address the multiple below water table extractive operations, the multiple permits to take water in the Aberfoyle area and those of the Region of Waterloo and The City of Guelph. A model representing the south side of Mill Creek was presented in support of the Safarik Pit application. A model for the infilling of the McNally pit was presented in Attachment 1 of this report. WSP has many of the elements required to holistically look at this area. This pit alone will have permanent local impacts to groundwater flow to Mill Creek let alone during active extraction.	Cumulative Impact
64	See response to Comment 2.	Cumulative Impact
7	We defer to GEI for their input on the flooding issue and defer to GEI to comment.	Flooding
14	We understand that berms will be used to contain flood waters.	Flooding
17	We understand that a sub drain will be used to mitigate flooding of neighbours property. Verification monitoring is necessary. What effect does drain have on proposed final lake level?	Flooding
25	We defer to GEI for their input on the flooding issue.	Flooding
36	We will defer to GEI regarding flood mitigation measures.	Flooding
62	We understand berms will be used to address flooding issue and the drain will address underflow from the lake to the neighbouring property. We defer to GEI on this matter.	Flooding
88	We defer to GEI for discussion on flooding matters.	Flooding
95	For discussion with GEI regarding flood control measures.	Flooding
3	There are three areas of concern in relation to water level changes and adjacent private properties. <b>Northeast</b> There is up to a one metre permanent water level change predicted for the northeastern area of the site. This water level change extends off site beneath the neighbouring property to the north. Attachment #4 and our personal observations shows that some of this property is inundated because of beaver dams on Mill Creek. The groundwater model, used to determine off-site water level changes, is a) recognized to be conservative by using a Drain function for Mill Creek (one way groundwater flow to Mill Creek) and b) recognized as not being able to simulate all of the hydrological processes. Therefore as water levels decline in this area, firstly water held in storage will decline followed by decreased runoff as this will be used to compensate for unsaturated soils and thirdly, reversal of groundwater flow from Mill Creek to the wetland area. Perhaps, all of these processes occur simultaneously. All of this complicated by seasonal flooding and beaver activity. Our comment is that the predicted impact occurs on private property north of 2nd Concession Road. This impact was not recognized by the Natural Heritage evaluation in the original submission. <b>South</b> The redistribution of groundwater discharge to Mill Creek results in a reduction/loss of groundwater flow in the area of Zone 2 wetland. This has been characterized as a minor change in the hydrology, however has also been characterized as having only a minor contribution of groundwater to the hydrological support. Groundwater presently flowing from north to south through Zone 2 will cease. Presently this north to south flowing groundwater prevents water from Mill Creek from entering the wetland. Will the future wetland be supported by direct precipitation and reverse flow from Mill Creek? Attachment #3 confirms the redistribution but does not discuss actual impact of the redistribution. <b>SouthWest</b> The potential flooding of private lands is proposed to be mitigated through the installation of a subsurface drain designed to capture the excess water and divert it northward into Tributary 3. A total of 220m <sup>3</sup> /day is estimated to be diverted through the drain into Tributary 3. Figure 4 of the October 21, 2005 Groundwater Uplift Report shows the neighbour's house to be almost surrounded by wetlands including those along Tributary 3. Does this affect hydroperiod of the wetlands or affect use of the neighbour's property in any way? What does drain do to the final lake level estimate? Confirmatory monitoring is recommended to validate the model results.	General Water Level Changes
11	There are upward gradients on-site and regionally, Mill Creek is a groundwater discharge zone.	Groundwater Flow System Characterization
12		Groundwater Flow System Characterization
13		Groundwater Flow System Characterization
15	OK	Groundwater Flow System Characterization
20	Response Noted	Groundwater Flow System Characterization
35	This site is located at the termination of a large groundwater flow system. The wetlands surrounding this site and the cold water fisheries are indications of regional groundwater discharge. Licensing the site to a blanket elevation of 285 m AMSL where Figure 2 clearly shows many areas onsite that do not have resource below 290 m AMSL and where there are geological layers that isolate lower hydrogeological systems from shallower systems should be offered as much protection as possible. We are fully onboard with maximizing the resource, it is our opinion that greater detail to depth of extraction to minimize impacts and disruption of groundwater flow beneath confining layers should be obtained.	Groundwater Flow System Characterization
38	We disagree that the water level in MW18-05 represents the water table given the difference in chemistry and hydrograph. We maintain that mining through finer grained geological layers may affect the upward gradient at stations such as MW18-05. The depth to the bottom of resource at MW18-05 is approximately 294 m AMSL. There is no need to license to 285 at this location.	Groundwater Flow System Characterization
39	Noted	Groundwater Flow System Characterization

Comment	Response March 2026	Issue
40	We maintain that there are artesian conditions show at MW18-05 and licensing should be limited to the depth of known resource in this area and not a blanket 285 m AMSL.	Groundwater Flow System Characterization
41	This is a sensitive hydrogeological area at the end of a regional groundwater flow system. As such, the greatest impact to hydrologically sensitive areas such as wetlands and cold water streams occurs in this area and demands better definition of hydrogeology such that the model can better simulate potential changes. We are not satisfied with the level of calibration for the groundwater model.	Groundwater Flow System Characterization
54	It is our opinion that the scaling methodology used is subject to influences not accounted for in the scaling method.	Groundwater Flow System Characterization
56	It is unclear what the value of bedrock elevation is at the bullseye around MW18-05.	Groundwater Flow System Characterization
59	This site is located at the termination of a large groundwater flow system. The wetlands surrounding this site and the cold water fisheries are indications of regional groundwater discharge. Licensing the site to a blanket elevation of 285 m AMSL where Figure 2 clearly shows many areas onsite that do not have resource below 290 m AMSL and where there are geological layers that isolate lower hydrogeological systems from shallower systems should be offered as much protection as possible. We are fully onboard with maximizing the resource, it is our opinion that greater detail to depth of extraction to minimize impacts and disruption of groundwater flow beneath confining layers should be obtained.	Groundwater Flow System Characterization
66	Water Report section 5.7.3 mentions upward gradients with respect to Mill Creek, Tributary #3 and PSW's. It is our opinion that referring to this site as an area of downward hydraulic gradients is not inaccurate given the on-site observations.	Groundwater Flow System Characterization
67	See Response to Comment #35	Groundwater Flow System Characterization
68	See Response to Comment #35	Groundwater Flow System Characterization
69	See Response to Comment #35	Groundwater Flow System Characterization
70	See Response to Comment #35	Groundwater Flow System Characterization
71	Groundwater levels at MW18-05 are different because of the geological make up of the site. These localized layers have not been captured in the model and yet are important to the local groundwater regime feeding water to local wetlands and Mill Creek. There is not sufficient detail in the geological investigation nor the proposed mining plan to allow for appropriate mitigation (through mine depth reduction e.g.) to maintain this local groundwater flow system.	Groundwater Flow System Characterization
72	Nonetheless localized artesian conditions are indicated by the water levels in MW18-05 and confirmed by water quality.	Groundwater Flow System Characterization
77	Noting that onsite and near site observations include many instances of upward hydraulic gradient, discharge conditions that are susceptible to change from mining impacts both from equivalent pumping rate of extraction and physical removal of geological layers.	Groundwater Flow System Characterization
78	Noting that onsite and near site observations include many instances of upward hydraulic gradient, discharge conditions that are susceptible to change from mining impacts both from equivalent pumping rate of extraction and physical removal of geological layers.	Groundwater Flow System Characterization
79	Noting that onsite and near site observations include many instances of upward hydraulic gradient, discharge conditions that are susceptible to change from mining impacts both from equivalent pumping rate of extraction and physical removal of geological layers.	Groundwater Flow System Characterization
8	See our Responses to Comments 40-58	Groundwater Model
37	Response noted.	Groundwater Model
42	We concur that a groundwater divide may well exist, but this does mean perpendicular groundwater flow from the divide. Much of the Paris Moraine is a groundwater divide, but flow from the divide is not perpendicular to the crest.	Groundwater Model
43	This site is located at the termination of a large groundwater flow system. The wetlands surrounding this site and the cold water fisheries are indications of regional groundwater discharge. Artesian conditions occur in specific areas within wetlands or Mill Creek according to the hydrogeological constraints, such as till layers. This area has developed specialized flora and fauna, somewhat based on groundwater discharge conditions. The pit will remove, not only sand and gravel, but also silt layers that direct or redirect groundwater flow. This model, as a tool, can provide general impacts, but lacks the detail, needed to address direct impacts to specific areas within Mill Creek or the wetlands.	Groundwater Model
44	Acknowledged.	Groundwater Model
45	As a tool, the model cannot represent conditions such as those observed at SP18-03 or MW18-05, nor the impacts of removal of fine grained layers at the site.	Groundwater Model
46	Detailed hydrogeological investigation of the bedrock beneath the site was not conducted, leaving the model to infer conditions from offsite sources.	Groundwater Model
47	It remains our opinion that the model is not a very accurate representation of water level changes in the surface water features, and includes features that do not exist. We understand from the response that the initial head is defined as the ground surface in the wetlands and drawdown is calculated from that initial head to the model computed heads.	Groundwater Model
48	Acknowledged.	Groundwater Model
49	Acknowledged.	Groundwater Model
51	Response noted.	Groundwater Model
53	Acknowledged, the head loss across the lake was not otherwise mentioned.	Groundwater Model
57	In an hydrogeological regime where centimeters of water level change may make a difference to hydroperiods and volume of groundwater discharge, a discrepancy of one metre is significant. All but one of the predicted values skew below the theoretical regression line for on-site targets, all located in a small elevation section of the overall calibration. This suggests a localized issue with the model. There is an under prediction of water levels at the site and it is unclear to us how this affects predictions related to final water levels, flooding, baseflow reduction in upgradient areas of Mill Creek etc...	Groundwater Model
58	See Response to Comment 57.	Groundwater Model
61	Noted that final lake level fluctuations will be about 0.3 metres. It is not clear that the proposed drain has been included in the final rehabilitation model.	Groundwater Model
63	Detailed hydrogeological investigation of the bedrock beneath the site was not conducted, leaving the model to infer conditions from offsite sources.	Groundwater Model
74	No change in our comment. Figure 14A should be presented with a smaller contour interval, say 0.1 m.	Groundwater Model
4	It is noted that there is no overall reduction in groundwater discharge, however Zone 1,2 and 5 wetlands will have reduced groundwater discharge as will Mill Creek. We were looking for confirmation that biologists were satisfied that this is not problematic for the flora and fauna of the wetlands and Mill Creek.	Reduced Groundwater Discharge to Wetlands/Streams
5	Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. I have asked Aboud and Associates to weigh in on significance of groundwater input reductions and overall reductions. Also, where groundwater increases we have asked for Aboud to comment.	Reduced Groundwater Discharge to Wetlands/Streams
6	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced?	Reduced Groundwater Discharge to Wetlands/Streams
9	The natural heritage report does not acknowledge the potential for water level decline beyond the 120 m distance and should be revised to evaluate whether or not the projected impacts from the model are problematic for the wetland. If so, either the pit design must change, mitigation considered or monitoring considered. Attachment #4 provides a qualitative assessment of impacts to the PSW's. The impacts have been described as minor or minimal. Our concerns have been expressed to Aboud and Associate for further comment.	Reduced Groundwater Discharge to Wetlands/Streams
10	The seeps identified by the biologists may be significant for flora and fauna. Do the biologists recognize that these seeps are in the zone of groundwater flow reversals and will this impact on the flora and fauna. Where is this evaluation of the impact of flow reversal stated? Figure 15 in Appendix G of the Water Report clearly shows large section of Mill Creek that will no longer have groundwater discharge.	Reduced Groundwater Discharge to Wetlands/Streams

Comment	Response March 2026	Issue
16	Attachment #3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced?	Reduced Groundwater Discharge to Wetlands/Streams
18	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced?	Reduced Groundwater Discharge to Wetlands/Streams
19	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant overall reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced? Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
21	Attachment 3 does not address individual areas of loss of groundwater discharge. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
22	Attachment 3 does not address individual areas of loss of groundwater discharge. Will discuss with Aboud and Stovel in regard to magnitude and relevance. Not sure agree with assessment that groundwater input is only 9% of flow, what is it during dry months, what is the effect of cool water from groundwater presently? Need to review Monitoring.	Reduced Groundwater Discharge to Wetlands/Streams
23	Attachment 3 does not address individual areas of loss of groundwater discharge. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
24	Good discussion on redistribution. Can the Township be made aware of the DFO comments?	Reduced Groundwater Discharge to Wetlands/Streams
26	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced? Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
28	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced? Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
29	The increases in groundwater discharge to the wetlands is noted and we rely on the NH specialists to comment.	Reduced Groundwater Discharge to Wetlands/Streams
30	We are asking the Natural Heritage report to reflect the predicted impacts from the Water Report.	Reduced Groundwater Discharge to Wetlands/Streams
31	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced? Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
32	Attachment 3 does not assess the loss of flow to Zones 1,2 and 5. We concur that overall there is no significant reduction in groundwater discharge to Mill Creek or Tributary 3, but what happens in those areas where groundwater flow is greatly reduced? Attachment 4 is a qualitative assessment. Based on values in Attachment 4 and from the Water Report I have prepared Table 1 attached. Aboud and Associates are aware of our concerns.	Reduced Groundwater Discharge to Wetlands/Streams
34	None of the reports including the 2025 attachments acknowledge the expected drawdown beneath the wetlands beyond the 120 m study zone. We do not agree that a qualitative assessment is reasonable approach. It must be made clear that the NH specialists have considered the drawdown beyond 120 m and agree that the impact is acceptable.	Reduced Groundwater Discharge to Wetlands/Streams
50	The baseflow analysis provided in Attachment #3 confirmed that downgradient, there is no overall change but does not address localized reductions in baseflow.	Reduced Groundwater Discharge to Wetlands/Streams
55	The baseflow analysis provided in Attachment #3 confirmed that downgradient, there is no overall change but does not address localized reductions in baseflow.	Reduced Groundwater Discharge to Wetlands/Streams
73	Attachment #3 does not address local reductions in groundwater flow.	Reduced Groundwater Discharge to Wetlands/Streams
75	Three metres or more of drawdown is not insignificant in an area where wetlands and streams rely on groundwater discharge.	Reduced Groundwater Discharge to Wetlands/Streams
76	Year over Year reduction in baseflow to both Mill Creek and Tributary # 3 confirmed.	Reduced Groundwater Discharge to Wetlands/Streams
81	The planning report understates the extent of the water table drawdown.	Reduced Groundwater Discharge to Wetlands/Streams
82	The planning report understates the extent of the water table drawdown.	Reduced Groundwater Discharge to Wetlands/Streams
83	See Response #3. The water level changes are not insignificant and have impacts off-site.	Reduced Groundwater Discharge to Wetlands/Streams
85	The planning report understates the extent of the water table drawdown.	Reduced Groundwater Discharge to Wetlands/Streams
86	The planning report does not include the permanent impacts to the water table, permanent reduction in groundwater flow to reaches of Mill Creek and Tributary #3.	Reduced Groundwater Discharge to Wetlands/Streams
87	The planning report does not include the permanent impacts to the water table, permanent reduction in groundwater flow to reaches of Mill Creek and Tributary #3.	Reduced Groundwater Discharge to Wetlands/Streams
1	This is the first time that Harden was presented with the January 2024 model report. I have attached three figures to facilitate this discussion. Regarding the Harden Letter of February 11, 2024 the letter clearly refers to Schedule E which shows limited siltation infill in the Aberfoyle South pit area south of Hwy 401(Figure 1). This is the area designated Zone A (Figure 2)in the January 2024 WSP report. The image attached shows that Zone A is now completely full of silt and there are four feeder pits proposed to continue to supply silt, designated A through D on the attached Figure 3. The McNally pit will soon be, if not already out of compliance with the agreed to siltation areas from the 2024 OLT (Figure 1). The trench was a suggested mitigation to the noncompliant deposition of silt in Zone A and was not a blanket mitigation for any other infill. The Township expects that amendments to the McNally Pit license will be necessary to allow for continued silt deposition.	Silt at McNally
60	This is the first time that Harden was presented with the January 2024 model report. Regarding the Harden Letter of February 11, 2024 the letter clearly refers to Schedule E which shows limited siltation infill in the Aberfoyle South pit area south of Hwy 401. This is the area designated Zone A in the January 2024 WSP report. The image attached shows that Zone A is now completely full of silt and there are four feeder pits proposed to continue to supply silt, designated A through D on the attached figure. The McNally pit will soon be, if not already out of compliance with the agreed to siltation areas from the 2024 OLT. The trench was a suggested mitigation to the noncompliant deposition of silt in Zone A and was not a blanket mitigation for any other infill. The Township expects that amendments to the McNally Pit license will be necessary to allow for continued silt deposition.	Silt at McNally
80	See our Response #1.	Silt at McNally
27	Show mitigation barrier on site plans (similar to Tikal Pit) and invoke if necessary without need to amend site plans. Contingent on water levels obtained east of Mill Creek. Need to read attachment as to why it is ok to eliminate groundwater flow to Mill Creek from the pit side.	Site Plan
84	Error noted.	Site Plan
89	Site Plan standards change noted, however, the link between site plan elevations from Geo Optic and those surveyed levels has not been provided.	Site Plan
90	Noted	Site Plan

Comment	Response March 2026	Issue
91	Addition of flow arrows noted.	Site Plan
92	Correction noted.	Site Plan
93	Correction noted.	Site Plan
94	Seasonal lake level variability noted.	Site Plan
65	Noted. A limited scope well survey may well be warranted at this stage given the presence of dug wells.	Well Survey

March 6, 2026

GEI Project No. 2402577 – 125006-036

VIA CLOUDPERMIT: Township of Puslinch  
Township Application No. D14-CBM

Monika Farncombe  
Township of Puslinch  
7404 Wellington Road 34  
Puslinch, ON NOB 2J0

**Re: ZBA 1<sup>st</sup> Formal Submission  
6947 Concession Road 2 (CBM Aberfoyle South Lake Pit)  
Puslinch, ON**

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed first formal submission documents for a Zoning By-Law Amendment application in support of a proposed aggregate extraction site on the subject lands located at 6947 Concession Road 2 in the Township of Puslinch. The submission was received from the Township on December 10, 2025, and January 23, 2026. CBM Aggregates refers to the proposed operation as “Aberfoyle South Lake Pit” and has applied for a Class A Licence under the Aggregate Resources Act with the Ministry of Natural Resources.

It is our understanding that the overall property is 85 ha in size, the area to be licensed is 44 ha, and the extraction limit is 27 ha. We understand that aggregate extraction will begin above the water table in the west-central portion of the extraction area and proceed westward towards the western edge. Extraction by dragline will then begin below the water table in the westernmost part of the extraction area and proceed in an easterly direction. Above and below water table extraction will then generally proceed concurrently in an eastward direction until extraction is complete. Raw aggregate will reportedly be temporarily stockpiled onsite to allow pore water to drain back to the emerging pit pond, before transportation offsite for processing. Rehabilitation following the anticipated 6 to 10 year extraction period will result in a permanent pond with naturalized shoreline.

The subject lands currently have four accesses to Concession Road 2. The most western of these accesses would be the operational entrance for pit trucks, and the easternmost access would be a right-turn-only exit for pit trucks. Trucks will travel east along Concession Road 2 to the existing Aberfoyle South Pit (a left turn from Concession Road 2) where processing would occur. We understand that trucks leaving the subject lands will not go to other processing plants or directly to market.

An initial meeting for the proposed pit was held on September 28, 2021, but no formal engineering comments were prepared at that time. The proponent subsequently updated their application, and a pre-consultation meeting was held on July 27, 2023, with comments provided in our review letter dated August 8, 2023. A resubmission was received on November 30, 2023, with comments provided in our review letter dated February 6, 2024.

## **1. Documents Received**

All plans and studies required from an engineering perspective to support the zoning bylaw amendment application have been submitted.

The following documents were received and reviewed by GEI as part of this submission:

- Response to Township and County Comments (Cover Letter), prepared by MHBC, dated December 4, 2025.
- Responses to Comments on Site Plan, prepared by MHBC, dated November 26, 2025.
- Response to Transportation Comments and revised Transportation Impact Study, prepared by TYLin, dated February 5, 2025.
- Responses to GM Blue Plan Review, prepared by WSP, dated October 22, 2025.
- Maximum Predicted Water Table Report, prepared by WSP, dated November 2023.
- BMPP for the Control of Fugitive Dust, prepared by WSP, dated October 2023.
- Water Report Level 1/2, prepared by WSP, dated November 2023.
- Natural Environment and Water Report Terms of Reference Concordance Cross-Check, prepared by WSP, dated January 27, 2025.
- Flood Mapping, prepared by WSP, dated August 12, 2025.
- Supplemental Assessment of Potential Impacts to Baseflow in Mill Creek and Tributary 3, prepared by WSP, dated October 21, 2025.
- Supplemental Assessment of Potential Impacts to Provincially Significant Wetlands, prepared by WSP, dated October 21, 2025.
- Supplemental Assessment and Mitigation of Post-Rehabilitation Groundwater Uplift, prepared by WSP, dated October 21, 2025.
- Headwater Drainage Feature Assessment, prepared by WSP, dated October 22, 2025.
- Site Plan drawings, prepared MHBC, dated November 2025.

The following documents were received as part of this submission and will be reviewed by Township staff and other consultants:

- Land Transfer of Ownership Receipt, dated March 15, 2018.
- Stage 1 and 2 Archaeological Assessment, prepared by WSP, dated August 28, 2023.
- Stage 3 Archaeological Assessment, prepared by WSP (Location 3), dated June 1, 2023.

- Stage 3 Archaeological Assessment, prepared by WSP (Location 5), dated June 1, 2023.
- Agricultural Considerations Review, prepared by MHBC, dated September 8, 2023.
- Natural Environment Report, prepared by WSP, dated November 2023.
- Noise Impact Assessment, prepared by WSP, dated November 2023.
- Planning Report and ARA Summary Statement, prepared by MHBC, dated November 2023.
- Review and Entry into the Ontario Public Register of Archaeological Reports, prepared by Ministry of Citizenship and Multiculturalism, dated November 10, 2023.
- Application to Amend the County Official Plan, dated November 20, 2023.
- Public Consultation Strategy, dated November 20, 2023.
- Drinking Source Water Protection Form, dated November 20, 2023.
- Planning Act Applications Letter, dated November 29, 2023.
- Aggregate Resource Evaluation, prepared by WSP, dated November 2023.
- Hydrological and Ecological Monitoring Plan, prepared by WSP, dated October 21, 2025.
- Responses to Aboud and Associates Inc., prepared by WSP, dated October 22, 2025.
- Responses to GRCA, prepared by WSP, dated October 22, 2025.
- Responses to Harden, prepared by WSP, dated October 22, 2025.
- Responses to Stovel and Associates Inc., prepared by WSP, dated October 22, 2025.
- Responses to Wellington Source Water Protection, prepared by WSP, dated October 22, 2025.
- Response to Valcoustics Canada Ltd., prepared by WSP, dated October 31, 2025.

## 2. Additional Documents Required

All plans and studies required from an engineering perspective to support the zoning bylaw amendment application have been submitted and additional documents are not required at this time. We are in support of this application being deemed complete.

## 3. Technical Comments

No.	Matter	Document	Comment
1.	Existing Condition of Concession Road 2 and Culverts	Transportation Impact Study	<p>We have been advised that it is not possible to defer the geotechnical and structural investigations of Concession Road 2 and Bridge Structure 2012 to detailed design as a condition of approval. The nature of required off-site road improvements are required to be identified at the zoning bylaw amendment stage.</p> <p>As such, we ask that to support the zoning bylaw amendment application, a geotechnical investigation of Concession Road 2, from the Aberfoyle South Pit West Access west to the proposed Aberfoyle South Lake Pit access,</p>

No.	Matter	Document	Comment
			<p>be completed to determine existing pavement and base structure and condition, and recommendations for required upgrades to the road in order for it to be considered the proposed haul route. Concession Road 2 is considered to be a truck route between Sideroad 25S and Sideroad 20S but is not a truck route west of Sideroad 20S. However, it would be beneficial to investigate the entire haul route and provide necessary upgrade recommendations. This can then facilitate further discussion with the Township.</p> <p>Similarly, we ask that structural testing/inspection of the culvert over Mill Creek, located approximately 120 east of the site on Concession Road 2 (Bridge Structure 2012), be completed to confirm if it is suitable for the anticipated loads as is, or what upgrades would be necessary to have it meet the future required level of service. A comprehensive structural investigation including soil bearing capacity testing, concrete and rebar testing, and bridge deck inspection, is required. Again, the conclusions and recommendations of the structural investigation would facilitate further discussion with the Township about next steps.</p>
2.	Sightline Analysis	Transportation Impact Study	<p>A topographical survey of the Concession Road 2 centreline in several hundred metres each direction (distance to be determined by the analysis) is required to be completed for each entrance/exit to support the sightline analysis.</p>
3.	Road Signage	Site Drawings	<p>Per the TIS and Township's Traffic Consultant, signage is required to restrict trucks from turning left out of the site driveway onto Concession Road 2 and also from continuing westbound on Concession Road 2 beyond the site access. There should also be signage placed at the Sideroad 20S and Sideroad 25S intersections with Concession Road 2, prohibiting trucks from making either an eastbound right turn or a westbound left turn. Please note/show signage on the Operational Site Plan.</p>
4.	Rumble Bars	Site Drawings	<p>The TIS recommends rumble bars be installed at the pit's operational exit to slow down trucks merging onto Concession Road 2. These will also mitigate mud and debris tracking onto Concession Road 2. Please show on the Operational Site Plan.</p>
5.	Oversize Loads	-	<p>Please provide a written procedure outlining how proper weighing of trucks will be implemented using a calibrated scale, to prevent oversize loads of raw aggregate being hauled to the Aberfoyle South Pit, potentially putting the Township Road and culvert structure at risk of accelerated degradation over the long-term.</p>

No.	Matter	Document	Comment
6.	Grading Plans	Site Drawings	<p>Please provide preliminary operational grading plans for each phase of the planned extraction. Currently detailed grading is only provided on the rehabilitation plan, and while we acknowledge that the rehabilitation plan is progressive, it is difficult to review the impacts of the perimeter grading and berms as they are constructed over the operational period.</p>
7.	Flood Potential	Flood Mapping Memo	<p>The Flood Mapping memo concludes that to minimize the potential for flooding, the ground surface around the perimeter of the Site will be graded to a design elevation (up to 304.6m per the Memo), and berms will be installed to ensure flood waters do not move to lower lying areas outside of the extraction area or onto adjacent lands. Flood waters will be permitted to enter the pit at the northeast corner of the site. As noted above, preliminary grading plans for each operational phase should be provided. Based on these plans, please provide additional flood mapping showing how far the floodplain will extend, for each storm event, including the regional storm, during existing conditions, during each phase of operations, and after full rehabilitation, based on proposed grading. The impacts of the flooding on the Site and neighbouring properties during the 6-10 operational period and post-rehabilitation need to be better understood. Do the HEC-RAS cross-sections for Tributary 3 or Mill Creek need to be updated due to alterations to the floodplain?</p> <p>The tables in the Flood Mapping memo provide water surface elevations for a regional storm, but a flood elevation map has not been provided for the regional storm. Please provide this for the next submission. It appears that a regional storm in 1982 has been modelled – please provide details. Is there a reason that Hurricane Hazel was not used?</p>
8.	Proposed Tile Drain	Post-Rehabilitation Groundwater Uplift Memo	<p>The potential flooding of private lands is proposed to be mitigated through the installation of a 350 m long, 200-300 mm diameter, subsurface drain at an invert elevation of approximately 301.25 m, located in the 30 m setback area, and designed to capture excess groundwater water during high water table periods post-rehabilitation, and divert it northward to Tributary 3. It is estimated that a total of 212 m<sup>3</sup>/day would be diverted post-rehabilitation through the drain into Tributary 3. We recommend that the drain be added to the groundwater model to better demonstrate the long-term impacts on groundwater and surface water on the Site and neighbouring properties. Per the Township Hydrogeologist, confirmatory monitoring is recommended to validate numerical model results and document impacts.</p> <p>Please show the maintenance setback for the tile drain, taking into account the depth of the drain and a suitable cut</p>

No.	Matter	Document	Comment
			<p>ratio based on soil type. Please discuss long-term operation and maintenance of the drain beyond pit operations. Who will be responsible for monitoring, inspection and repairs in the long term? There is concern that because the drain is located in the 30 m setback area, any failure of the drain requiring replacement would result in significant impacts to vegetation and potentially adjacent wetland.</p> <p>The toe of the tile drain will terminate at Tributary 3 on a rip-rap outfall apron. Please show the rip-rap apron on the Site Drawings and demonstrate that it is sized and designed adequately to prevent erosion. Please assess the impacts of increased flows to Tributary 3 downstream of the drain inlet, including on culvert sizes downstream on neighbouring properties.</p>
9.	Submission Format	Various Memos and Reports	For future submissions, it would be helpful to reviewers if the various technical memos provided with this submission were incorporated into a cohesive report.

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

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.  
Project Engineer

March 11, 2026

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

Attention:           Monika Farncombe  
[mfarncombe@puslinch.ca](mailto:mfarncombe@puslinch.ca)

**VIA E-MAIL**

**Re:   Peer Review of Response Letter to Noise Impact Study Peer Review  
Aberfoyle South Pit Expansion  
Puslinch, Ontario  
VCL File: 123-0460**

Dear Ms. Farncombe:

We have completed our review of a letter regarding “Response to Valcoustics Canada Ltd. Peer Review of the Noise Study Completed in Support of the Aggregate License Application for the Proposed CBM Aberfoyle South Lake Pit”, dated October 31, 2025, prepared by WSP Canada Inc. (WSP).

Our comments are outlined herein.

- a)    WSP should confirm that the movement of aggregate material to the existing Aberfoyle South Pit will not result in additional off-site noise impacts due to increased truck activity.
- b)    In the Road Traffic Noise Prediction (Attachment 2), what do these items represent?
  - a.   Road grade mode of 2?
  - b.   Leq of 0.00 dBA for Highway 401 (4<sup>th</sup> column on page 19 of the pdf)?
  - c.   Reference Leq of 63.60 for Highway 401 (15<sup>th</sup> column on page 19 of the pdf)?
  - d.   Leq of 54.85 for Highway 401 (16<sup>th</sup> column on page 19 of the pdf)?
  - e.   Av?
  - f.   Hs?
  - g.   Heff?
  - h.   Ad?
  - i.   Af?

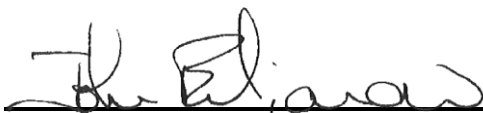
- j. Ap?
- k. Ah?
- c) The ORNAMENT road traffic noise prediction model is not recommended for source to receiver distances greater than 500m. How was the calculation to predict Highway 401 traffic noise, with a source to receiver distance of more than 1,000 m done?
- d) The response to comment e) refers to commitments intended to reduce equipment noise under the best practices on the Site Plans. Where is this included?
- e) The source table in response f) a indicates truck sound power level of 102 dBA. However, response f) a (2) states that a sound power level of 103 dBA was used for the trucks. Review of the sample calculations in Attachment 1 indicate a sound power level of 102 dBA was used for the trucks. Further clarification is needed.
- f) Response f) a (7) states that sound power levels of the line source are based on the truck's speed. What speed was used to model the truck movements?
- g) One of the recommendations of the noise study is that prior to operations commencing, sound measurements of the equipment to be used on site be undertaken to confirm maximum emission levels are not exceeded. The response to f) a (8) is that the sound power levels in the table are average sound power levels. What are the maximum sound power level limits that the recommended measurements are to be compared against?

Based on our review of the noise study prepared in support of the Aberfoyle South Pit Expansion, there are a few items, as outlined above, that require further clarification.

If there are any questions, please do not hesitate to call.

Yours truly,

**VALCOUSTICS CANADA LTD.**

Per:   
**John Emeljanow, P.Eng.**

JEV  
2026-03-11 Peer Review V2.0.docx



606-55 Cedar Pointe Drive,  
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Web: [www.LEGroupLtd.com](http://www.LEGroupLtd.com)

March 10, 2026

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

Attention: Monika Farmcombe, Development and Legislative Coordinator

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RE: Landscape Architecture Peer Review of CBM Aberfoyle South Lake Pit Expansion  
Zoning By-law Application,  
Site Address: 6947 Concession Road 2, Puslinch, ON  
Our File: LA 1092-26

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Dear Monika,

Landmark Environmental Group Ltd (LEGroup) is in receipt of your email of request of January 23, 2026 for peer review comments regarding a Zoning By-law Amendment application for a proposed Aggregate Pit Expansion (extraction) application by CBM Aggregates, located at 6947 Concession Road 2, Puslinch Township. CBM has applied for a Class A License through the Aggregate Resources Act and refers to the application as the Aberfoyle South Lake Pit.

We understand that the extraction area under application is approximately 27.5 ha (67 acres) within the licensed area of 44 ha (110 acres) of the subject site. We also understand that the pit extraction will take place both above and below the ground water table. The Operation Plan includes four (4) phases as illustrated on the Aberfoyle South Lake Pit Plans (ARA Site Plans) prepared by CBM Aggregates and MHBC.

Our services will include review of the landscape features to be installed for progressive rehabilitation of the pit, including buffer/screening, tree shrub replacement species, size and whether the plant material specified are native and indigenous, given its proximity to environmentally sensitive woodlands and wetlands.

We will also comment on the Visual Impact Assessment Report, prepared by MHBC to review sightlines into the extraction area between adjacent residents and public roads adjacent to the site and comment on the proposed mitigation/buffering to reduce the visual impact.

Documents received and reviewed for preparation of our review by Landmark Environmental Group (LEGroup) as part of Mary's this submission:

- Planning Report & Aggregate Resources Act (ARA) Summary Statement by CBM Aggregates dated November 2023;
- ARA Plans (Dwg 1-5) by CBN Aggregates, dated November, 2023;
- Noise Impact Assessment by WSP Canada, dated November 2023;
- Natural Environmental Report by WSP Canada, dated November 2023;
- CBM Aggregates Proposed Aberfoyle South Pit Expansion by MHBC, dated November 29, 2023;
- Visual Impact Assessment by MHBC dated March 27, 2024;
- Hydrological/Ecological Monitoring Plan-CBM Aberfoyle South Lake Pit by WSP Canada, dated October 21, 2025;
- Stovel and Associates Inc. (SAI) Review Comments by WSP Canada, dated October 22, 2025;
- Aboud and Associates Inc./Township Comments Review by WSP Canada, dated October 22, 2025;
- Headwater Drainage Feature Assessment-CBM Aberfoyle South Lake Pit by WSP Canada, dated October 22, 2025;
- Valcoustics Peer Review Responses by WSP Canada, dated October 31, 2025;
- ARA Plans w. Agency & Public Redline Comments (Dwg 1-5) by CBN Aggregates, dated November 2025;
- MHBC Response to County/Township Comments on Aberfoyle South Lake Pit Application, dated November 26, 2025;
- Response to Township/County Comments for CBM Aberfoyle South Lake Pit by MHBC, dated December 4, 2025;

### Technical comments

The following are the peer reviewer's observations and comments on the proposed landscape features to be installed for progressive rehabilitation of the pit treatment at the subject site and review of the Visual Impact Assessment Report:

Num ber	Topic	Section	LEGroup Comment
1	ARA Plans November 2025	General	As part of the Aberfoyle Lake Pit Rehabilitation Plan that has been submitted, we note that a dedicated Landscape Plan and Details has not been provided. Pls submit Landscape Plan/Details for review and as set out in comments below.
2	ARA Plans November 2025	Drawing 1 of 5 Existing Features Plan	No Comment

LANDMARK ENVIRONMENTAL GROUP LTD.

Landscape Architecture, Consulting Arboriculture & Urban Forestry Services

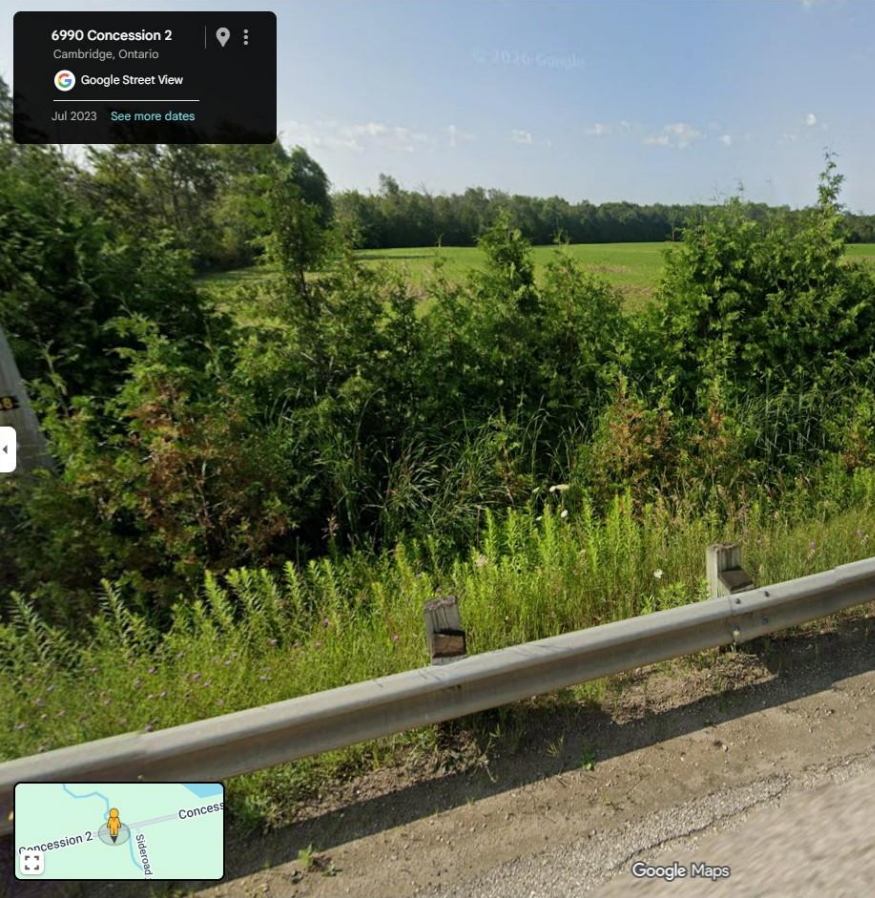
#606-55 Cedar Pointe Drive, Barrie, Ontario L4N 5R7 •Office: 705.796.1122 [www.LEGroupLtd.com](http://www.LEGroupLtd.com)

Number	Topic	Section	LEGroup Comment
3	ARA Plans November 2025	Drawing 2 of 5 Operational Plan	<ul style="list-style-type: none"> <li>○ Show native species, height and calipre sizes, planting density, quantity, layout of plant material in naturalized configuration on Optional Storage Berms (Planting Plan, Plant List, etc)</li> <li>○ Provide the buffer planting design on the Landscape Plan using native conifer, 1.6m height trees along the Acoustic 'North Berm' in a naturalized configuration to demonstrate effective screening that meet the intent of the Acoustic Report;</li> <li>○ Provide approved planting details for trees, shrubs, ground cover;</li> <li>○ Provide Typical Berm Detail enlargement on a Landscape Detail page;</li> <li>○ Revise Optional Storage Berm on the east side of the Entrance/Exit to Concession Road #2, to provide visual screening for Phase 4 Plan.</li> </ul>
4	ARA Plans November 2025	Drawing 3 of 5 Operational Notes	<ul style="list-style-type: none"> <li>○ F4-Seed mix stated has Kentucky Bluegrass seed in mix, not considered native. Pls consider another mix such as OSC 8225 Native Slope and Hillside or approved equal, applied by hydroseed slurry method;</li> <li>○ F7-Add Operational Note F regarding tree planting along Concession 2 berm on the Landscape Plan, with an appropriate density of planting;</li> <li>○ L2a) ii) Provide similar notation on the Landscape Plan regarding the Migratory Birds Convention Act and dates to avoid removal;</li> <li>○ L2e) v) Provide for a monitoring of plant material installed on the 'North Berm' for guarantee and warrantee purposes. Provide note on the Landscape Plan advising the same;</li> <li>○ L8 Visual Impact Assessment Report-see No. 7 below.;</li> </ul>
5	ARA Plans November 2025	Drawing 4 of 5 Rehabilitation Plan	<ul style="list-style-type: none"> <li>○ D1a)c) Proposed vegetation for the Nodal Planting Detail requires a wide variety of native plant material, labelled planting plan/plant list, installation details, approximate scaling and dimensioned nodal separation of plantings;</li> <li>○ D1d) recommends a 1,200 trees per/ha target density to be shown on the Landscape Plan and 70% of the planted species as coniferous. Norway Spruce (<i>Picea abies</i>) is non-native, drought intolerant and should not be specified for replanting at this site;</li> <li>○ D2c) Provide a scaled Nodal Planting Detail such that installers can verify the spacing needed between plantings within the node and distance between nodal areas;</li> <li>○ D3 Provide details on the types of native non-invasive ground covers;</li> <li>○ Wetland Area Detail-provide native emergent herbaceous vegetation in accordance with the Detail;</li> <li>○ Shoreline Area Detail-Consideration of supply and install emergent planting on the Landscape Plan/Details/Plant List, as shown in the Shoreline Area Detail, enhancing pond for fish and amphibians.</li> </ul>
6	ARA Plans November 2025	Drawing 5 of 5 Cross Sections Plan	<ul style="list-style-type: none"> <li>○ Provide a schematic detail, showing the Progressive Rehabilitation Plan sequence for a typical Phase.</li> </ul>
7	Visual Impact Assessment Report	Sections 1.0, 2.0, 3.0, 4.0, 5.0 & 6.0	<ul style="list-style-type: none"> <li>○ 3.0 Visual assessment completed by MHBC during leaf-off condition to inventory/analysis of visual and landscape character of the subject site and identification of areas of visual impact;</li> <li>○ The Visual Impact Assessment included the Identification of public views and adjacent residence views that will impact views due to the extraction activities;</li> <li>○ 4.0 Views into the site were described in the Report, due to the partially open nature of the frontage of the subject site;</li> <li>○ 4.3 Visual impacts took into account only views of adjacent residence and private driveways and not from all possible public views along Concession Road 2;</li> <li>○ Mitigation measures to be considered include berm and native coniferous tree planting and ground cover, where required;</li> </ul>

## LANDMARK ENVIRONMENTAL GROUP LTD.

Landscape Architecture, Consulting Arboriculture &amp; Urban Forestry Services

#606-55 Cedar Pointe Drive, Barrie, Ontario L4N 5R7 •Office: 705.796.1122 [www.LEGroupLtd.com](http://www.LEGroupLtd.com)

Number	Topic	Section	LEGroup Comment
			<ul style="list-style-type: none"> <li>○ Visual characterization appears to be slight elevated at Concession 2 but otherwise, with generally open views from the Concession to the proposed extraction areas;</li> <li>○ 5.1 no photos were taken at the Concession 2/Sideroad 20 South just west of the intersection, (see Google Streetmap photo below) that shows leaf-on visual from Concession Rd 2 (where there is no residence driveways) toward the subject site, which shows an open visual from the roads. This location is close to the operational entrance, which shows an Optional Storage Berm. It is recommended that this Optional Storage Berm be revised to a 4.0m Acoustic Berm with planting on the Landscape Plans. This location is the extraction at Phase 4 and would be closest to the Concession 2;</li> </ul>  <ul style="list-style-type: none"> <li>○ The Report concludes that although there is high to medium potential views to the extraction site, (mostly view potential from driveways at residences adjacent to the site), from the residences, there is an overall low visual impact;</li> <li>○ Report should provide a scaled cross-section of Concession 2, berm and remediation planting of the proposed Landscape Plan for review to visually demonstrate extent of mitigation.</li> </ul>
8	MHBC Response to County/Township comments	SAI ARA Site Plan Comment #9	<ul style="list-style-type: none"> <li>○ 9. Agree with comments that a schematics and vegetation plan that visually buffers and provides aesthetic appeal to the entrance area could be considered which can be implemented into the Site Plan/Landscape Plan to the County's and Township's satisfaction;</li> </ul>

If there are any additional queries regarding our comments, please feel free to contact our office.

Regards,

A handwritten signature in black ink, appearing to read 'JH', enclosed in a light gray rectangular box.

Jim Hosick MSc(PI), OALA, RPP  
Principal-Landscape Architect  
ISA Certified Arborist ON-1098A  
Registered Professional Forester #2673 (Provisional)  
Registered Consulting Arborist (RCA) #783  
**Landmark Environmental Group Ltd.**



Vooren Air Quality Management Services Inc.

February 12, 2026

Monika Farncombe  
Planning and Corporate Services Coordinator

Township of Puslinch  
7404 Wellington Rd. 34,  
Puslinch, ON, N0B 2J0

Dear Monika

**Re:** Air Quality Peer Review  
Rezoning Application for CBM Aggregates, Division of St. Marys Cement Inc.  
Proposed Aberfoyle South Pit Expansion

The Township of Puslinch received an application to permit aggregate extraction under the Township of Puslinch (the "Township") Zoning By-law and the County of Wellington Official Plan. The application pertains to lands located at 6946 Concession Road 2, Part of Lots 18, 19 and 20, Concession 1 in the Township of Puslinch (the "Site"). We ("VAQMS") were retained to undertake peer review of the air quality aspects of the application. The application was filed by CBM Aggregates ("CBM"), Division of St. Marys Cement Inc. for the Proposed Aberfoyle South Pit Expansion.

The VAQMS Peer Review considered the following reports and correspondence provided as part of the submission:

1. Best Management Practices Plan for the Control of Fugitive Dust at Aberfoyle South Pit Expansion, prepared by WSP Canada Inc., dated October 2023 ("Dust BMPP");
2. Noise Impact Assessment for Aberfoyle South Pit Expansion, prepared by WSP Canada Inc., dated November 2023 ("Noise Report");
3. Response to Valcoustics Canada Ltd., Peer Review of the Noise Study Completed in Support of the Aggregate Licence Application for the Proposed CBM Aberfoyle South Lake Pit, prepared by WSP Canda Inc., dated October 31, 2025 ("Noise Comments");
4. Planning Report & Aggregate Resources Act Summary Statement, CBM Aggregates, a Division of St. Marys Cement Inc. (Canada), Proposed Aberfoyle South Pit Expansion, by MacNaughton Hermesen Britton Clarkson Planning Limited (MHBC), dated November 2023 ("Planning Summary Statement");
5. Responses to Township of Puslinch and County of Wellington Comments on Aberfoyle South Pit Application, prepared by MHBC Planning, Urban Design & Landscape Architecture, dated November 26, 2025 ("MHBC Response Comments"); and,

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Puslinch CBM Aberfoyle SL Pit - Air Quality Peer Review Feb 6 2026 Rev 1.docx

## VAQMS

6. Site Plans for Aberfoyle South Lake Pit, by MHBC Planning, Urban Design & Landscape Architecture, dated for application submission, November 2025 ("Site Plans").

The critical air quality aspects of the proposed pit are:

1. No material processing at the site. Processing, including screening and crushing, are often very significant sources of dust emissions requiring significant dust mitigation. No processing is proposed for the site.
2. 95% of the extraction is underwater. Excavating and handling of dry materials is often a major source of dust emissions. Given the wet nature of the materials being excavated at the proposed site, the dust emissions from handling the aggregate will be insignificant.
3. Limited equipment on site. The proposed operation includes two loaders and an excavator/backhoe. Up to 14 trucks per hour are anticipated at the site. The loading, moving and truck traffic can be a source of dust emissions. The major sources of dust that could occur from the equipment would be loading of dry materials and dust emissions from the on-site haul routes. The application proposes to control these specific dust emissions through the Dust BMPP.
4. Control of possible track out. The Site Plans show a 20 m paved entrance to the pit. The paved entrance will help minimize track out of mud and silt to the Concession 2 Road, but the paved section must also be maintained to avoid dust emissions from materials deposited on the paved entrance section.

No specific air quality study or assessment was completed for the application. Neither the Township of Puslinch or the County of Wellington have a specific requirement to provide an air quality study as part of an Aggregate Resources Act submission. Even without specific submission requirements, typically, an air quality study would be submitted, and the results of the air quality study would include the detailed Dust BMPP.

The only reference to air quality impacts is found in the Planning Summary Statement, indicating that *"subject to the implementation of the proposed mitigation measures regarding water quality, noise, dust and traffic, there are no anticipated impacts to the agricultural system"*. No further discussion is provided on potential air quality impacts to neighbouring residents. Though we find the lack of an air quality study unusual, our experience does let us conclude that with a properly executed Dust BMPP, the air quality impacts of the proposed operation should be minimal.

Our review of the application documents found the following:

1. The Dust BMPP is dated October 2023 and is based on the November 2023 Site Plans. Through discussions and comments, CBM updated their site plans (November 2025) to include a 20 m paved entrance to the site from Concession 2 Road. The Dust BMPP does not include the paved entrance as a source of fugitive dust emissions in Table 2 (page 5), Table 4 (page 7), Table 6 (page 8) or Appendix A (Risk Ranking). Table 3 (page 6) does mention mitigation for paved roadways, but the significance is not discussed nor are further details provided. The paved entrance will be subject to track-out of mud and silt from the site and if not well cleaned and maintained can become a major dust source. **The Dust BMPP must be updated to provide a**

**better discussion concerning paved roads and best practices mitigation for the on-site paved entrance road. The Dust BMPP update should also include appropriate tracking logs for mitigation activities on the paved entrance.**

2. Even with the inclusion of a paved entrance, track-out of silt and mud can still occur to Concession 2 Road. The current BMPP does not consider cleaning or managing potential track-out from the site. In the MHBC Response Comments (response to GM BluePlan Engineering, Comment 5), MHBC indicates, in response to road cleaning that *"Details related to the maintenance of Concession 2 would need to occur directly with the Township"*. The Township By-Law 2023-058, "A By-law To Regulate Road Activity", clearly requires the site operator to maintain any haul route (Clause 18 in the By-Law). The By-Law requires the applicant to obtain a Haul Route Permit to ensure the roads are maintained as required. **The Dust BMPP must be updated to include the required mitigation for Concession 2 Road, including at a minimum, the requirements stipulated by By-Law 2023-058.**
  
3. The proposed site operations will not be subject to Ministry of the Environment, Conservation and Parks ("MECP") permissions. With no major material processing on site, the proposed operations would not require any air quality permits from MECP. The Dust BMPP will therefore only be enforced through the Ministry of Natural Resources Aggregate licence. As is typical, the full details of the Dust BMPP are not included on the Site Plans. The Dust BMPP is referenced on Drawing 3 of 5, Site Plan Notes, L Report Recommendations, Item 7 as *"Dust: "Best Management Practices Plan for the Control of Fugitive Dust at Aberfoyle South Pit Expansion" October 2023 (Source: WSP) The purpose of this plan is to document the Best Management Practices for the control of fugitive dust emissions from activities taking place at the pit. The licensee shall follow these Best Management Practices including preventative procedures and reactive control measures e.g. sweeping and/or watering to reduce vehicle track-out at paved pit entrance, limiting on-site vehicle speeds, reduce material handling during high wind conditions, etc. An inspection of the conformity with the BMPs will be documented monthly and a watering log must be maintained to record dust control activity. The BMPP shall be reviewed periodically and updated if required."* (underline added for emphasis). We note the Site Plan notes have now included some proposed mitigation for the paved entrance, not included in the Dust BMPP, but offers no further details. The Site Plan note and the Dust BMPP (under "Version Control") allow for a periodic review and update of the Dust BMPP if required. In stating that the Dust BMPP can be revised, enforcement by MNR would require MNR to review and inspect against any future unapproved Dust BMPP. **We recommend that any periodic review and update to the Dust BMPP should require the new Dust BMPP to be filed with MNR (ideally as a Site Plan amendment) to ensure that the Site Plans and MNR enforcement follow the most recent Dust BMPP.**
  
4. The Dust BMPP (page 7) states *"Hours of operation will be restricted during any period in which a wind warning for the area has been issued by Environment and Climate Change Canada and during any time where weather, traffic and unusual events would compromise the ability of Site alteration activities to be conducted in a safe and environmentally sound manner with due consideration of the public."* While this is an appropriate action, there is no specific detail on

how this will be managed at the site. Environment Canada issues Yellow, Orange or Red Wind alerts. **The Dust BMPP must be updated to be specific with regards to actions that are to be taken at the site for each level of Environment Canada wind alert and indicate who takes on-site responsibility for the changes in on-site operations and activities.**

5. The Dust BMPP provides a procedure for monthly inspections and maintaining a log of when unpaved roads are watered (Section 4.3 page 8 and Appendix E). It is only in the monthly dust inspection form that the question is asked "*is visible dust observed from any section of roadway?*". A monthly observation of a dust plume from on-site traffic is totally inadequate. Watering the unpaved areas must occur when dust plumes are noticeable behind the trucks. It is important to apply water immediately to mitigate emissions. The frequency and extent of watering must be determined by visible plumes extending from the trucks and not done on an arbitrary watering schedule.

Watering for mitigation is listed in Table 3 (page 6) of the Dust BMPP but lacks necessary detail. The procedure indicates applying at least 1 litre/m<sup>2</sup> of water after 24 hours of dryness. No frequency is provided nor is "dryness" defined. **The Dust BMPP must be updated to include the use of visible dust plumes from haul traffic and operations as a trigger for mitigation. The procedure for using visible dust plumes and triggering mitigation must also be included in the responsibilities section (Section 3.0 page 3) and the training section (Section 4.2.1 page 8) of the Dust BMPP.**

6. The Dust BMPP does not address dust emission management for soil removal, placement during rehabilitation and surface stripping. Soils are very high silt content resulting in very high dust emission potential when dry; especially in hot, dry summer months. **The Dust BMPP should be updated incorporate an appropriate mitigation strategy to address soil handling.** The strategy would build on the recommendations for visible dust plume management stated in Comment 5 above or recommend limiting soil handling during wetter months.
7. No details are provided, in either the Dust BMPP or the Site Plans, if CMP intends to have a dedicated water truck on site. The watering log provided in Appendix D implies that a contractor will be used. **We recommend that given the immediate requirement of watering when dust plumes are noticeable on-site, CMP maintain an on-site watering truck and operator.**

Similar considerations for timing of mitigation will need to be developed for the paved entrance and Concession 2 Road. While it is not anticipated that CMP would maintain an appropriate sweeper at site, it is important that CMP commit to ensuring any contracted sweeping, for both the paved entrance and Concession 2 Road, be available on a quick response contract. **Further details on contracted sweeping response times and requirements should be included in the Dust BMPP.**

8. The Dust BMPP does not include any discussion on handling complaints. Moreover, the Dust BMPP is silent on providing publicly visible on-site contact information (e.g. phone number,

email address) should there be off-site dust impacts. It would be appropriate for the Dust BMPP to include appropriate methods for the public to lodge a complaint, should an issue arise at the site or off-site as a result of the operations. As well, the Dust BMPP should include a procedure for handling complaints, including appropriate documentation (i.e. complaint form), notifying the MECP Spills Action Centre, carrying out additional mitigation and developing a corrective action to avoid the source of the increased dust emissions in the future. **We recommend that the Dust BMPP and the Site Plan be updated to include an appropriate complaint response procedure.**

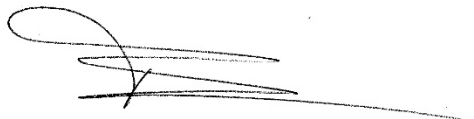
## Conclusions and Recommendations

The proposed Aberfoyle South Pit Expansion can be operated with minimal air quality impacts to the surrounding area if the operations at the site are well controlled to minimize dust emissions. A detailed Dust Best Management Practices Plan is required to ensure appropriate and timely mitigation of dust emissions. The current BMPP, which would be enforced through the Site Plans, is not sufficiently detailed nor does it include all potential dust emission sources.

Until an updated Dust BMPP is provided, it would be premature to conclude that the Aberfoyle South Pit will be operated to minimize air quality impacts.

Please contact us, if you have any further questions or require further clarification.

Yours truly,



Tony van der Vooren Ph.D., P.Eng.  
President  
Vooren Air Quality Management Services Inc.



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ENVIRONMENTAL IMPACT  
STATEMENTS  
ECOLOGICAL LAND  
CLASSIFICATION  
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GREEN ROOFS  
CONTRACT ADMINISTRATION

#### EXPERT OPINION

OLT TESTIMONY  
LEGAL PROCEEDINGS  
PEER REVIEW  
RESEARCH  
EDUCATION

March 16, 2026

Our Project #: AA21-049A-004D

Sent by email: [planning@puslinch.ca](mailto:planning@puslinch.ca)  
[mfarncombe@puslinch.ca](mailto:mfarncombe@puslinch.ca)

Monika Farncombe  
Township of Puslinch  
7404 Wellington Rd. 34  
Puslinch, ON N0B 2J0

**Re: Responses to About & Associates Inc. / Township of Puslinch  
Review Comments - Proposed CBM Aberfoyle South Lake Pit  
(Prepared by: WSP Canada Inc., October 22, 2025)  
Peer Review – Ecology OPA submission documents**

Dear Ms. Farncombe:

About & Associates Inc. (AA) has been retained by the Township of Puslinch to complete a Peer Review of the Natural Environment Report (NER) and the Site Plans for the proposed Aberfoyle South Pit Expansion, Puslinch, ON. WSP Canada Inc. has issued a Technical Memorandum and several supplemental attachments in response to the Technical Peer Review completed by AA, dated February 8, 2024. This letter provides a review of the additional information submitted, including the following:

- Responses to About & Associates Inc. / Township of Puslinch Review Comments - Proposed CBM Aberfoyle South Lake Pit
- Attachment 1:
  - o Table 2 (Weather Conditions and Staff Qualifications)
  - o Table 3 (Amphibian Call Count Data)
  - o Table 4 (Breeding Bird Survey Breeding Evidence)
- Attachment 2: Fish Community Survey
- Attachment 3: HDF Assessment
- Attachment 4: MECP Correspondence
- Attachment 5: Natural Environment and Water Report Terms of Reference Concordance Cross-Check
- Attachment 6: Updated Figure 2
- Attachment 7: Supplemental Assessment of Potential Impacts to Provincially Significant Wetlands

Based on our review of the provided information, AA provides the following comments:

### **Methodology**

The Peer Review was completed based on company experience and knowledge, standards for Environmental Impact Assessments in Wellington County and the GRCA, and the requirements of provincial and municipal policy documents. The review also cross-references the work completed with the accepted Terms of Reference, AA's comments on the Terms of Reference (dated October 26, 2021), and AA's comments on the Pre-Consultation Request (dated August 17, 2023) to ensure all requirements of the ToR have been met.

Our review has been broken down by outstanding comments pertaining to the NER and supplemental attachments provided in the Technical Memorandum. The following sections provides a brief summary of any primary concerns or comments for each document.

### **Natural Environment Report**

AA acknowledges receipt of the supplemental information provided in the form of a comment response matrix and supporting attachments. Based on our review, the additional information provided addresses several of AA's original comments and has improved the clarity of the assessment. However, a significant number of comments are outstanding or require further clarification.

### **Study Area**

The study area for the Natural Environment Report was defined as the proposed excavation limits and the area within 120 m of these limits. However, the groundwater modelling indicates that predicted changes to groundwater conditions will extend beyond 120 m from the excavation area. At present, the Natural Environment Report relies primarily on field data collected within the 120 m study area to inform the impact assessment and does not fully evaluate the potential for effects beyond this boundary.

In addition, field investigations appear to have been largely limited to lands owned by the proponent. In areas where private property restricted access, observations were made from roadside locations or from areas where access was permitted. While this approach is understandable from an access perspective, it introduces the potential that sensitive habitats or vegetation communities beyond the accessible areas may not have been fully documented, which may reduce the overall confidence in the impact assessment.

Given that the groundwater modelling predicts potential changes extending beyond the defined study area, it is recommended that the impact assessment be revisited to consider the broader area of predicted groundwater influence. Expanding the evaluation in this manner would help ensure that any potential effects to natural heritage features beyond the 120 m boundary are appropriately identified and assessed.

### ***Groundwater***

The primary outstanding concern relates to the assessment of potential impacts to Mill Creek, the surrounding Provincially Significant Wetland (PSW), and associated wildlife habitat. The portion of Mill Creek within the study area is located along the eastern boundary, where groundwater modelling predicts a reduction in groundwater elevation. However, Mill Creek flows westward through an area where the modelling indicates an increase in groundwater elevation. At present, it appears that the evaluation of impacts for Mill Creek reflect only the groundwater conditions on the eastern portion, rather than the full range of predicted changes.

Given the spatial variability in projected groundwater conditions across the site and surrounding landscape, AA recommends that the impact assessment be revisited to address these differing groundwater influence zones. This review should consider whether the potential effects to Mill Creek, the PSW, and associated habitats may differ between areas of predicted groundwater decrease and increase. Where sections of Mill Creek or associated features fall outside the areas previously surveyed or where information is limited, supplemental field observations should be undertaken to ensure that baseline conditions are adequately characterized in all areas and that the assessment appropriately reflects the full spatial extent of potential groundwater-related effects. Further, the proposed ecological monitoring plan should account for these variations and include monitoring locations within both decreased and increased groundwater influence zones for fisheries, amphibian, and wetland receptors.

### ***Tile Drain implementation***

The third matter relates to the proposed tile drain along the western boundary, discharging into Tributary #3. This design is anticipated to increase baseflow contributions beyond existing conditions. Confirmation is required that the downstream receiving watercourse has been evaluated to ensure it can accommodate the projected increase in flow without resulting in channel instability, excessive erosion, or downstream impacts. In addition, a private driveway crossing is located downstream within Tributary #3. Clarification should be provided to confirm that this structure has been assessed for hydraulic capacity under the proposed flow regime and to determine whether upgrades to the culvert may be required.

Further to the above, AA has concerns regarding the proposed location of the tile drain within the 30 m buffer setback from the PSW. While the current land use within this area is agricultural and installation of a tile drain under existing conditions is unlikely to result in direct impacts to the PSW, the tile drain represents long-term infrastructure that will require periodic maintenance, repair, and eventual replacement. As currently proposed, the tile drain is shown to be buried within the buffer and beneath a berm. A detailed plan should be prepared outlining the extent of excavation required for the installation of this structure to evaluate the potential for adjacent impacts and demonstrate that it can be installed without encroaching the dripline and wetland limit. Future access for repair or replacement would require excavation and disturbance within what is intended to function as a restored natural heritage buffer. Over time, this buffer area is intended to naturalize and become part of the PSW's ecological protection zone. Locating permanent infrastructure within this setback is therefore not appropriate from a long-term natural heritage planning perspective. Consideration should be given to relocating the tile drain outside of the buffer to avoid future potential impacts.

AA acknowledges that a Letter of Advice (LOA) has been issued by Fisheries and Oceans Canada (DFO). However, clarification is requested to confirm that the tile drain design and anticipated baseflow changes to Tributary #3 were included as part of the submission reviewed by DFO, as these elements were introduced later in the review process. Further discussion regarding fisheries is provided below as part of the Attachment 2: Fish Community Survey review.

### ***Cumulative Impacts***

Since the original submission of the Natural Environment Report, several additional technical studies and assessments have been completed and circulated as part of the review process. While these documents address previous data gaps and provide important information regarding anticipated impacts, it is currently unclear whether the anticipated effects identified across these studies have been evaluated collectively from a broader, cumulative perspective.

Given the interrelated nature of the potential impacts to hydrology, groundwater, surface water features, wetlands, and associated ecological receptors, AA recommends that a cumulative impact assessment be undertaken. This assessment should summarize the findings of the various supporting technical studies and clearly demonstrate how the predicted changes interact spatially and functionally across the site and surrounding natural heritage features.

AA further recommends that a revised Natural Environment Report be prepared and resubmitted with the incorporated additional technical information that demonstrates how the combined effects have been considered within the overall impact assessment.

Subject to the above outstanding concerns, the supplemental information has largely advanced the assessment and resolved many of the initial technical concerns identified during the first round of review.

**Attachment 1: Table 2 (Weather Conditions and Staff Qualifications)**

AA does not have any major concerns relating to this supplemental document, which has supported the resolution of previous comments.

**Attachment 1: Table 3 (Amphibian Call Count Data)**

There are several assumptions made in the analysis of data that are not technically correct per the SWH criteria. While ‘wetland’ amphibian breeding habitat is typically >120m from a woodland, this is not a requirement for candidacy, and several of the amphibian stations could be considered both woodland and wetland candidate habitat and should be assessed under both types. For example, the assessment for station 3 notes that the wetland must be >120m from a woodland to be considered candidate ‘wetland’ amphibian breeding SWH, however, this distance is not a requirement for candidacy. In addition, several surveys note that the habitat did not meet the abundance threshold, however, in past communication with MNR staff, they have noted that it is a cumulative total of individuals of all species, not an individual total per species.

Given the assessment for Significant Wildlife Habitat (SWH) and impact assessment in the NER was based on several incorrect assumptions, these conclusions should be reviewed and updated, where appropriate.

**Attachment 1: Table 4 (Breeding Bird Survey Breeding Evidence)**

AA does not have any major concerns relating to this supplemental document, which has supported the resolution of previous comments.

**Attachment 2: Fish Community Survey**

The methodology of the fish community survey appears to be appropriate. However, the conclusion that salmonids are absent from Tributaries #2, #3, and #5 appears to be largely based on the survey results. To confirm that this conclusion is appropriate, clarification is required regarding the specific location and length of reaches sampled, as well as the level of sampling effort expended (e.g., catch per unit effort) in each reach. Justification should be provided to demonstrate that the level of sampling effort was sufficient to reasonably conclude the absence of these species. Additionally, it may

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not be appropriate to conclude the absence of salmonids from these tributaries based on only one sampling event, particularly considering the connectivity of the watercourses and migratory nature of salmonids to access spawning habitats.

Additional clarification is required regarding the rationale for excluding sampling within Mill Creek. The proponent indicates that sufficient background fish community information is available, including documented occurrences of Brook Trout (*Salvelinus fontinalis*). However, Brook Trout appear to have been excluded from the impact assessment on the basis that Brown Trout are the dominant salmonid species and that Brook Trout may be restricted to smaller coldwater tributaries. In the absence of recent, site-specific fish community sampling conducted within Mill Creek, this conclusion is not sufficiently supported. Furthermore, available ARA survey point data document the presence of Brook Trout within Mill Creek upstream of the site.

While the potential for impacts to the Mill Creek fishery has been determined to be low, insufficient information has been presented to justify excluding Brook Trout from consideration within the Mill Creek fish community. It is noted that the fish habitat assessment lacks observations for the majority of Mill Creek within the area of predicted groundwater changes. Therefore, supplemental fish habitat assessments and salmonid spawning surveys should be performed within the entire length of Mill Creek and tributaries in order to confidently rule out impacts.

Additionally, it is recommended that Brook Trout be used as the baseline species for impacts to ensure the most sensitive species has been considered, including during the development of the ecological monitoring plan. This should include implementation of salmonid redd spawning surveys, to verify continued use of the system and to detect any changes in reproductive activity over time. Where appropriate, clearly defined monitoring thresholds and adaptive management triggers should be established based on Brook Trout life history requirements, including thermal tolerances and spawning habitat needs.

### **Attachment 3: HDF Assessment**

The field methodology applied in the Headwater Drainage Feature (HDF) Assessment is considered appropriate and consistent with the *Ontario Stream Assessment Protocol (OSAP), Section 4 Module 11 – Unconstrained Headwater Sampling* and the *CVC/TRCA Evaluation, Classification, and Management of Headwater Drainage Features Guideline*. However, AA does not agree with several aspects of the feature classification and the resulting management recommendations.

In particular, several components of the classification appear to be under-represented, resulting in lower overall feature rankings than would be anticipated based on the documented field observations. Evidence of standing water during late summer survey conditions, amphibian breeding activity, and the presence of wetland or scrubland riparian communities collectively suggest a stronger hydrological and ecological function than reflected in the final classifications. These observations indicate that certain features function, at least in part, as groundwater discharge (upwelling) areas and provide demonstrated habitat value.

While AA recognizes that the aforementioned guidelines allow for the application of modifiers and professional discretion to account for adjacent agricultural land use activities, the extent to which modifiers have been applied appears excessive and not well justified, resulting in a substantial downgrading of feature classification and management recommendations. In several instances, the rationale for modifiers does not appear fully supported by aerial imagery or field context, particularly where features retain intact riparian vegetation and are not actively cropped through. The cumulative application of modifiers in this case has the effect of minimizing the ecological and hydrological importance of these features.

Additional justification is required in order to accept the conclusion that these features do not warrant formal protection designation within the context of the proposed extraction limit. Given the apparent groundwater discharge function of certain HDFs and their demonstrated contribution to downstream flows, the recommended management approach of “Maintain Recharge” is not considered sufficient in the case of HDF-1 and HDF-2. This recommendation is typically applicable to features functioning primarily in infiltration; it does not adequately address features that contribute baseflow through groundwater upwelling. The assessment should include further discussion regarding how the proposed removal of these HDFs may influence downstream hydrology, including potential changes to baseflow contributions to the receiving tributaries and ultimately Mill Creek. It is currently unclear whether the modelled changes in baseflow incorporate the potential loss of these HDF functions, or whether these effects would need to be incorporated as part of the broader cumulative impact assessment discussed above.

Additional justification should be provided to demonstrate how the hydrological function, flow contribution, and associated habitat values of these features will be maintained during and following extraction.

**Attachment 4: MECP Correspondence**

AA does not have any major concerns relating to this supplemental document, which has supported the resolution of previous comments.

**Attachment 5: Natural Environment and Water Report Terms of Reference  
Concordance Cross-Check – Proposed CBM Aberfoyle South Lake Pit**

AA does not have any major concerns relating to this supplemental document, which has supported the resolution of previous comments.

Confirmation should be provided from the proponent that all reviewing parties of the Terms of Reference (TOR) have provided acceptance. This was requested in Comment #50 and remains outstanding.

**Attachment 6: Updated Figure 2**

AA does not have any major concerns relating to this supplemental document, which has supported the resolution of previous comments.

**Attachment 7: Supplemental Assessment of Potential Impacts to Provincially  
Significant Wetlands – Proposed CBM Aberfoyle South Lake Pit**

The supplemental wetland assessment appears to be largely qualitative in nature and introduces a significant degree of uncertainty regarding the magnitude of potential impacts to the PSW complex. The assessment identifies several zones that are expected to experience hydrologic changes; however, the discussion appears to understate the potential for these changes to result in negative ecological impacts.

The presentation of plant community data is also insufficient to support independent review. Species composition and community structure are not clearly organized or linked to specific wetland communities, making it difficult to determine which species are present within each community type. As a result, it is challenging from a peer-review perspective to independently evaluate the potential ecological impacts or verify the conclusions presented in the assessment.

The wetland assessment further suggests that a reduction in overall water surplus may result in decreased drainage to downstream watercourses. It is unclear whether these potential reductions in wetland outflow have been considered within the broader fisheries and hydrologic impact assessments. Clarification is required regarding whether these changes have been incorporated into the modelling of downstream baseflow conditions and these effects would need to be incorporated as part of the broader cumulative impact assessment discussed above.

Additionally, the assessment largely focuses on the ability of the wetland vegetation communities to persist under conditions where precipitation becomes the primary water source. This approach does not adequately address potential impacts to other ecological functions of the wetland, including vernal pools and amphibian breeding habitat that may be supported by the existing shallow groundwater table.

Several species with CC value greater than 6 are identified within the botanical species list in the NER, including one species with a CC of 10, species with a high CC value have a high degree of fidelity to specific habitats and a low tolerance to changes in their environment and site disturbance. These species should be discussed and considered as part of the assessment of impacts resulting from a change in groundwater to the wetland communities. Several communities also had a significant number of obligate wetland species, and impacts to those communities should be considered and discussed specifically when it comes to changes in groundwater levels.

Lastly, the assessment assumes that the organic-rich wetland soils will continue to provide adequate water retention under altered hydrologic conditions. However, this assumption does not sufficiently consider the potential impacts of seasonal drought. Prolonged drying of organic soils can lead to irreversible structural changes that reduce their water-holding capacity. The potential role of the current shallow groundwater table in maintaining soil moisture during periods of limited precipitation should therefore be more thoroughly evaluated.

## **Conclusion**

In conclusion, our review of the submitted documents indicates that several outstanding concerns remain that require clarification and additional justification to demonstrate that potential impacts have been fully considered. While the supplemental responses and supporting information have addressed a number of the previously identified data gaps, further information and, where necessary, supplemental field investigations are recommended to ensure that the impact assessment has been completed at an appropriate level of detail. At this stage, AA is unable to fully confirm that all potential impacts to surrounding natural heritage features have been adequately characterized.

Given the number of supplemental technical memoranda and assessments prepared since the original submission of the Natural Environment Report, it is recommended that these materials be consolidated and resubmitted as part of a single comprehensive report and include an updated NER that integrates all responses to comments from all submissions. This would ensure that all findings are clearly integrated and that potential effects are evaluated collectively within the overall impact assessment framework.

Several comments remain regarding the implementation of mitigation measures and the scope of the proposed ecological monitoring plan, which require revision. To ensure that potential impacts to the surrounding natural environment are effectively mitigated, it is recommended that a more comprehensive and quantitative ecological monitoring plan be developed. At a minimum, this plan should include defined monitoring commitments for wetland vegetation plot monitoring, soil moisture readings, floristic quality assessment, amphibian monitoring, and salmonid redd spawning surveys. Monitoring should be conducted multiple times per year and across spring, summer and fall to ensure a comprehensive picture of baseline conditions and adequately captures changes that may be seasonal in nature. These surveys directly monitor the sensitive receptors identified in the impact assessment and should form the foundation of the monitoring framework.

Pre-extraction surveys throughout the limits of the groundwater impact area should be completed to establish clear baseline existing conditions. In addition, well-defined trigger thresholds and corresponding adaptive management measures should be clearly outlined and formally committed to. The monitoring program should be implemented annually throughout the active extraction phase and continue for an appropriate period following site restoration to evaluate potential long-term effects. One year of post-restoration monitoring is not sufficient to evaluate long-term impacts, given that the most significant impact is expected post-restoration (permanent change to groundwater availability). For the post-restoration phase, a reduction in monitoring frequency may be appropriate only once monitoring results demonstrate that no adverse impacts have occurred.

Please contact the undersigned should you require additional information of the above.

Yours truly,

**ABOUD & ASSOCIATES INC.**



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