

Safarik Pit – 1st Submission Comment Summary

April 28, 2026

Consultant	Comments
Source Water	See attached letter
Township Planning Consultant – Joe Nethery	See attached letter
Dougan Ecology	See attached letter
GEI Engineering	See attached letter
GRCA	See attached letter
Township Air Quality Consultant - VAQMS	See attached letter
Township Building Department	No further comments
Township Fire Department	No comments
Traffic Consultant – Salvini Consulting	See attached letter
Noise Consultant	See attached letter
Township Public Works	No comments
Hydrogeology – Harden	See attached letter
Township Bylaw	No comments
MTO	See attached letter



02/09/2026

Memorandum

To: Monika Farncombe - Planning and Corporate Services Coordinator

From: Keira Martinson - Source Protection Coordinator, Wellington Source Water Protection

Reviewed By: Kyle Davis - Risk Management Official, Township of Puslinch

**RE: Safarik Pit, 4275 Concession 7, Township of Puslinch
Zoning Bylaw Amendment**

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. This property is located within a vulnerable area and our review was completed to ensure the activities at this property meet the requirements of relevant Source Protection Plan and County of Wellington Official Plan policies.

Clean Water Act Section 59 Notice & Risk Management Plan:

A Section 59 Notice and Risk Management Plan are not required for this proposal at this time.

Land Use Planning:

WSWP request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official:

1. A Drinking Water Threats Disclosure Report and associated Management Plans as required by the County Official Plan policy 4.5.9.4. This report shall include, but is not limited to:
 - a. Winter maintenance activities including snow and salt management
 - b. Liquid fuel handling and storage
 - c. Chemical handling and storage
 - d. Waste handling, storage and disposal
 - e. Spill response proceduresPlease see attached Appendix C - Guidance Documents for additional information.
2. Documentation that any unused wells are decommissioned as per *Ontario Regulation 903* once the monitoring program is finalized. If no unused wells are present on the property, please confirm this in a future submission.
3. Confirmation whether a Permit to Take Water will be required for the site.
4. WSWP will comment on the ARA Approval License and Site Plan once posted on the ERO.



For more information, please contact sourcewater@centrewellington.ca.

Sincerely,



Feb 9, 2026

Keira Martinson
Source Protection Coordinator
519-846-9691 ext 283
kmartinson@centrewellington.ca

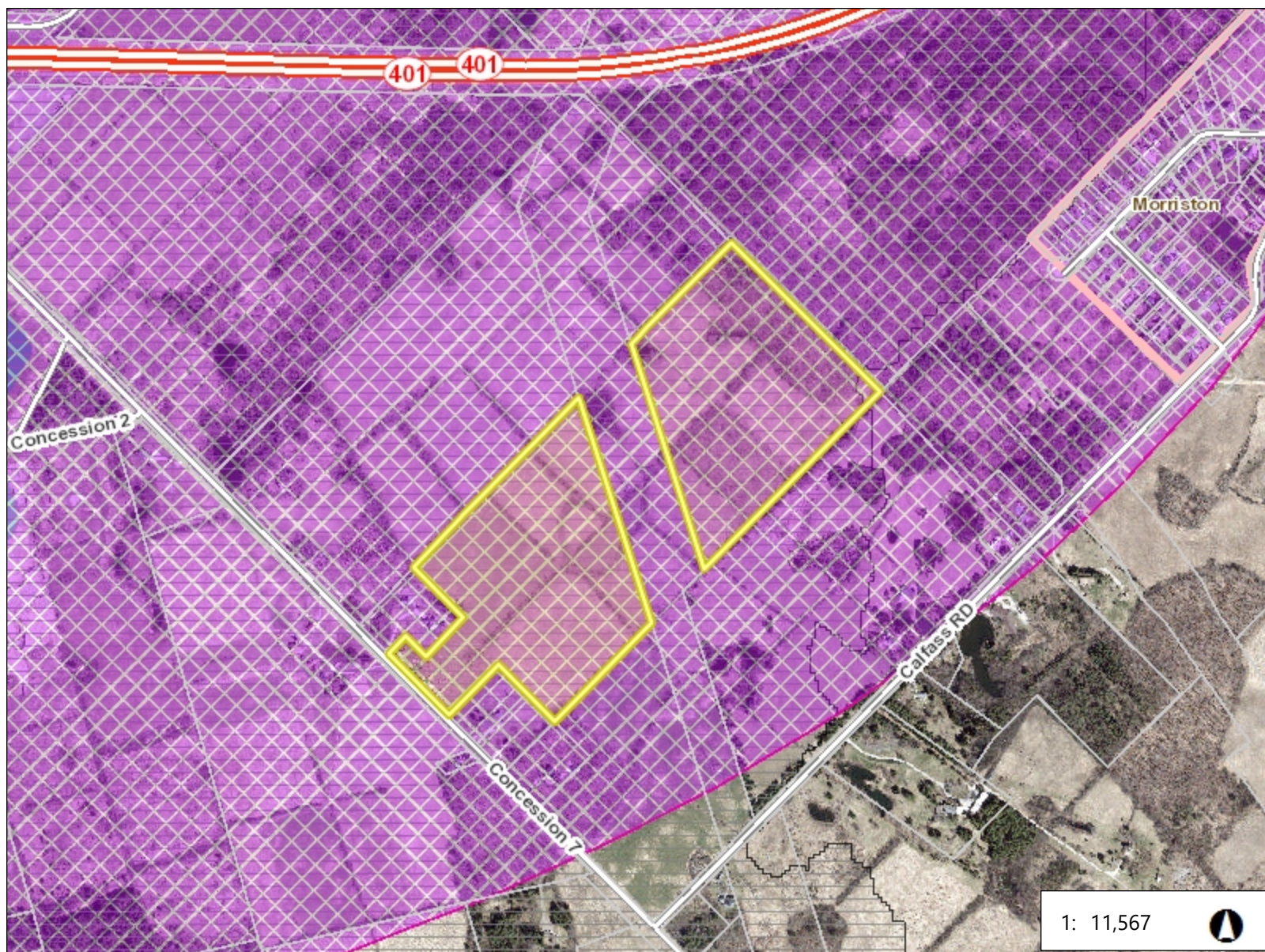


Feb 9, 2026

Kyle Davis
Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachments: Vulnerable Area Maps

Resources: [Appendix C: Guidance Documents](#)



Legend

- Parcels
- Roads
 - Local Road
 - County Road
 - Highway
- Urban Centres and Hamlets
- Municipalities
- RoadsLookup
- WHPA Q1/Q2 Boundary
 - WHPA Q1/Q2
 - Approved
 - Draft
- SGRA
- Intake Protection Zone Q
- Prime Agriculture

0.6 0 0.29 0.6 Kilometers

Notes

April 27, 2026

Monika Farncombe
Township of Puslinch
4704 Wellington Road 34
Puslinch, ON N0B 2J0

**Re: Zoning By-law Amendment Application – Safarik Pit
4275 Concession 7, Puslinch
Township File No.: D14-CBM**

Dear Monika and Justine,

Nethery Planning, on behalf of the Township of Puslinch, has received and reviewed a Zoning By-law Amendment application from CBM Aggregates on January 7, 2026, via the Township's CloudPermit portal. This is the first submission for a new Aggregate Pit located at 4275 Concession 7, Puslinch.

The proposal contemplates the establishment of a new aggregate extraction pit operation over approximately 27.6 hectares of the above noted subject property. This pit would function as a feeder pit to the nearby McNally Pit and would not host any on-site processing.

The following comments are provided for consideration through the review of the application:

1. 2024 PPS Policy 4.5.2.2 requires that extraction minimize social, economic, and environmental impacts. The application has not yet demonstrated that impacts have been minimized to an acceptable level as per peer reviewer comments by Harden Environmental, GEI Consultants, VAQMS, SCI, and Dougan & Associates.
2. The proposal includes extraction below the water table, which must satisfy Wellington County's Official Plan Section 6.6.9. While hydrogeological studies have been completed, peer review (Harden Environmental) identifies the site as a highly permeable hydrogeologic setting, raising concerns regarding groundwater vulnerability. It has not yet been clearly demonstrated that groundwater quality and quantity will be protected without adverse impacts.
3. Relatedly, the hydrogeological assessment remains dependent on modelling assumptions and does not yet provide sufficient certainty regarding long-term groundwater behaviour. Additional clarification is required regarding predicted drawdown, long-term water level conditions, and contingency measures, consistent with 2024 PPS Policy 4.5.3.

4. The lands are adjacent to features identified within the Natural Heritage System. Part 5 of the Wellington County Official Plan requires that development demonstrate no negative impacts and, where possible, enhancement of ecological function. Peer review (Dougan & Associates) identifies the need for more robust policy analysis, restoration planning, and monitoring commitments, which are not yet sufficiently developed.
5. The stormwater management approach remains conceptual. Peer review (GEI Consultants) notes that additional detail is required regarding containment, treatment, and infrastructure design, including liner systems and temporary works. The current submission does not yet demonstrate that water resources will be adequately protected under all operating conditions.
6. A key outstanding issue relates to water and sediment movement between sites. Peer review by Harden Environmental has identified this as a material concern, and the current submission does not yet fully resolve the potential for off-site impacts associated with silt-laden runoff or groundwater interaction.
7. A geotechnical investigation has been identified through peer review as necessary to support the proposed works. Without this information, it is not possible to confirm subsurface conditions, slope stability, or the feasibility and performance of proposed engineered controls.
8. The site is located in proximity to rural residential dwellings and active agricultural uses. While supporting studies have been prepared, additional clarification is required to demonstrate land use compatibility over the life of the operation, including cumulative impacts related to noise, dust, and traffic (PPS Policies 3.5 and 4.5.2.2).
9. The Noise Impact Assessment requires further refinement. Peer review (Valcoustics) identifies the need to assess worst-case operational scenarios and cumulative impacts with nearby aggregate operations, which have not yet been fully addressed.
10. The application does not yet demonstrate that rehabilitation will result in a landform that is compatible with surrounding agricultural uses, as required by PPS Policy 4.3 and Wellington County Official Plan Section 6.6.8(e). The proposed rehabilitation plan remains conceptual and lacks a clear implementation strategy, timelines, and measurable outcomes, contrary to PPS Policy 4.5.3.
11. The application does not clearly establish how source water protection requirements will be addressed, particularly given the site's location within a vulnerable aquifer area. In addition, the relationship between the Planning Act approvals and other required

approvals, including potential Environmental Compliance Approval (ECA) requirements, has not been clearly articulated.

12. The Heritage Impact Assessment speaks to annual inspections “should” occur. Cultural heritage resources should be conserved to demonstrate conformity with the County Official Plan (broadly in Section 4.1.5) and the status should be increased to a required inspection on the proposed site plan notes. The mechanism and workflow for such inspections can be discussed.
13. The proposal is for all processing to occur at the McNally operation (ARA #624864). Is it appropriate to amend that site’s ARA Licence to recognize this potential new feeder operation? Additional to technical comments raised, are there enough notations in the Site Plan notes to prohibit operations vehicles from hauling materials between the sites? Appropriate reference and regard needs to be given to the [Township’s Road Activity By-law 2023-058](#).

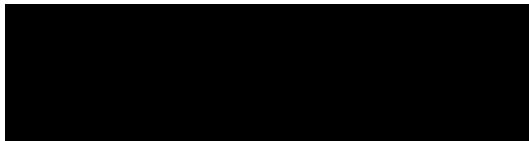
Conclusion

The submitted materials represent a substantial body of technical work; however, several key matters remain unresolved. These issues—particularly related to groundwater protection, hydrologic function, natural heritage, land use compatibility, and rehabilitation—are fundamental to determining consistency with the 2024 Provincial Planning Statement and conformity with the Wellington County Official Plan.

These matters may be addressed through updated technical studies and further refinement of the proposal. We look forward to reviewing additional materials as the application progresses.

The Township reserves the ability to provide additional comments and request further clarification or documentation as part of subsequent submission reviews, should new information or revised materials warrant further evaluation.

Yours sincerely,



Joe Nethery, MCIP, RPP
President

Encl.



3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

February 11, 2026

Township of Puslinch
7404 Wellington Rd. 34
Puslinch, Ontario
N0B 2J0
Attn. Monika Farncombe, Planning and Corporate Services Coordinator

**RE: 4275 Con Rd 7 ZBA - D14-CBM - 2301000005144000000- 4275 Concession 7 -
1st technical review**

Dougan has reviewed the Zoning Bylaw Amendment (ZBA) submission completed by CBM Aggregates in support of the proposed aggregate pit at 4275 Con. Rd. 7 in Puslinch, ON.

A Natural Environmental Report (NER) prepared by WSP (2025) has been submitted as part of the application, which aims to also satisfy any requirement for an Environmental Impact Study (EIS) as required by the Township and Conservation Authority. Based on initial review, it is our understanding that no pre-consultation or terms of reference (TOR) development with the agencies has been completed at this time.

As requested, our comments are provided below, structured as follows:

- Application Support - are there any technical concerns arising from your review of the reports submitted with the application?
 - Please itemize the concerns in a letter, using a numbered list identifying the issue (include a page # and section reference/citation) and any technical items required to clarify or resolve the issue.
1. Application Support - are there any technical concerns arising from your review of the reports submitted with the application?

Response: Not supported - There are technical concerns arising from the review of the reports submitted with the application. Details of comments are provided below.



General Comments:

Based on a review of the submitted materials, the following general comments are provided highlighting gaps in the provided submission, as well as issues with conclusions and assumptions within the provided NER:

- Mapping and documentation of existing tree cover on and within 120 metres of the proposed licensed area, to the level required by the ARA Site Plan Standards has not been provided (*Tree Inventory, Arborist report, and Tree Preservation Plan*);
- The NER relies on qualitative statements that wetland water regimes will remain “similar,” but does not evaluate seasonal hydroperiod sensitivity, despite acknowledging that wetlands depend on limited seasonal runoff. Please provide a seasonal (e.g., monthly) hydroperiod or water balance proxy for wetlands, comparing pre- and post-development conditions. Identify assumptions and limitations, and include a brief confidence/uncertainty statement;
- Several conclusions within the NER rely on assumed regulatory outcomes (ESA compliance, CA permitting, agency jurisdiction) without formal confirmation. Provide written confirmation from relevant agencies (e.g., MECP, Conservation Authority) where conclusions rely on regulatory interpretation. Where confirmation is pending, clearly qualify conclusions and identify conditions precedent to site alteration;
- The NER relies on multiple assumptions related to wetland hydrology, SAR habitat sufficiency, and wildlife movement, without explicitly acknowledging uncertainty or outlining how assumptions will be validated. Please include a brief confidence/uncertainty statement summarizing where conclusions are based on indirect evidence or professional judgment, and identify how monitoring, adaptive management, or regulatory review will be used to confirm assumptions over time;
- Identification and details of proposed tree screens and vegetated berms relied upon as mitigation, including their location, composition, and maintenance has not being provided within the submission;
- Drawings or plans that clearly illustrate the spatial extent and phasing of progressive and final rehabilitation plantings, including forest cover, wetlands, pollinator habitat, and naturalized ponds (*conceptual mitigation only has been provided in the Natural Environment Report*).



The materials circulated to date do not clearly demonstrate that these requirements have been met. Additional technical comments are provided below.

Technical Comments:

1. **Section 2.0, Page 2** - The Wellington County Forest conservation Bylaw 5115-09 may be applicable to portions of the site and should be reviewed in the context of the proposed application.
2. **Section 2.9, Page 7** - The NER indicates that Conservation Authority permits are not required due to the applicability of the Aggregate Resources Act (ARA). However, under the current Conservation Authorities Act and associated regulations, ARA licensing does not automatically exempt a proponent from Conservation Authority permitting requirements. The revised report should demonstrate, through mapping and written confirmation, whether any portion of the site or proposed works falls within a regulated area (e.g., wetlands, watercourses, floodplains, hazardous lands) as defined by the applicable Conservation Authority regulation. Until such confirmation is provided, it cannot be concluded that a Conservation Authority permit is not required.
3. **Section 4.3, Page 9 - Table 1** - Please provide survey start and end times for BBS, Turtle Basking, and Bat exit surveys.
4. **Section 4.3, Page 9 - Table 1** - Please confirm if bat habitat assessment surveys on May 13, 2022 included snag density plot surveys, and if surveys were completed during leaf-off conditions.
5. **Section 4.3, Page 9 - Table 1** - The third ACC visit was conducted on June 8, 2022 with a noted air temperature of 16°C, dropping to 15°C at some sites. The BSC 2008 guidelines for Marsh Monitoring Protocols states that air temperature during this window should be 17°C or higher. Please provide clarification on why surveys were completed in this window instead of waiting until conditions were potentially more suitable.
6. **Section 4.3.2, Page 11** - It is stated that monitoring station ACC-10 was added after the first round of surveys were completed. Please provide clarification on why this site was added to the survey program.
7. **Section 4.3.3, Page 11** - It is noted that cavities for red-headed woodpecker were noted during field surveys. Please clarify if assessment of suitable snags and cavities for Pileated Woodpecker (nests protected under MBCA) was also completed.
8. **Section 5.4.3.1, Page 22** - It is noted that the hedgerow and cultural thickets on site are not likely to have suitable trees for roosting bats. As per Table 3, the hedgerow contains several mature bitternut hickories and sugar maples, both species which may contain suitable snag features for SAR bats as well as



woodpecker nests protected under the MBCA. Complete a targeted tree assessment for trees proposed for removal, including evaluation of maternity roost potential (leaf-off assessment where appropriate). Document tree condition, cavity presence, exfoliating bark, and snag density.

9. **Section 6.1, Page 28-29** - The NER notes that ESA registration or further confirmation for species such as bobolink and eastern meadowlark will occur at a later stage, yet concludes no negative impacts. Please clarify that conclusions for these species are preliminary pending ESA confirmation. Provide a summary table identifying each SAR, current status of habitat confirmation, and required regulatory steps prior to site alteration.
10. **Section 6.3, Page 30** - Please clarify if unevaluated wetlands on the site were delineated by a staff certified by Ontario Wetland Evaluation System (OWES) to confirm the extent and size of wetland features.
11. **Section 7.1, Page 37** - Conclusions regarding negligible impact on SAR habitat rely on qualitative statements that removals represent a small proportion of available habitat, without quantifying tree removals or retained habitat. The revised report should quantify tree removals by species, size class, and roost suitability, compare removals to retained habitat within the relevant landscape context, and confirm whether an Information Gathering Form (IGF) submission to MECP is required.
12. **Section 7.2, Page 38** - The NER concludes that wetlands will not be impacted because they are surface-fed and located approximately 10 m above the groundwater table. However, the assessment does not explicitly evaluate how changes to site grading, pit excavation, berming, or internal drainage patterns may alter surface runoff pathways or contributing catchment areas that sustain these wetlands. Provide a wetland-specific assessment of surface water inputs, including mapping of contributing catchment areas and runoff pathways under pre- and post-development conditions. Demonstrate that pit development will not reduce, redirect, or delay surface runoff contributions to individual wetland pockets.
13. **Section 7.4.1, Page 40** - Several conclusions regarding SAR bats assume compliance based on avoidance timing and general mitigation, without formal regulatory confirmation. Please clearly outline the ESA compliance pathway for bats (e.g., confirmation of non-habitat, IGF submission, Notice of Activity, or permitting). Where confirmation is outstanding, qualify conclusions regarding "no impact."
14. **Section 7.0 - Impact Assessment & Section 8.0 - Rehabilitation/Mitigation/Monitoring** - Amphibians and reptiles are known to use adjacent wetlands and uplands, but the NER does not adequately assess construction mortality risk or the potential for the pit to function as a long-term population sink. The revised report should evaluate mortality risk during construction and operation, and identify mitigation measures such as wildlife



exclusion fencing, controlled access points, escape features, or eco-passages, as appropriate.

15. **Section 8.1, Page 44-45** - Buffers, linkages, revegetation, and enhancement measures are described throughout the NER but are not consolidated into a single, implementable framework. Please provide a consolidated mitigation and enhancement table identifying each measure, location, timing, performance objectives, and responsibility. Provide a corresponding map clearly illustrating buffers, screens, linkages, enhancement areas, and rehabilitation phasing.
16. **Section 8.2, Page 45** - Wildlife mitigation measures are described conceptually but are not consistently shown on drawings or tied to construction sequencing. Show all wildlife protection measures on site plans and phasing drawings. Incorporate requirements into construction notes and contractor obligations.
17. **Section 8.3, Page 46** - Despite multiple assumptions regarding wetland function, SAR habitat sufficiency, and edge effects, the NER does not recommend ecological monitoring. Please prepare an Ecological Monitoring and Adaptive Management Plan addressing wetlands, buffers, SAR habitat use, amphibians/reptiles, and invasive species. Include monitoring frequency, reporting requirements, and clear adaptive management triggers.
18. **Section 8.3, Page 46** - Given reliance on inferred hydrologic relationships rather than direct measurement, the absence of wetland-specific monitoring limits the defensibility of the “no negative impacts” conclusion. There should be a commitment to post-construction wetland monitoring (e.g., water levels, vegetation condition, invasive species). A monitoring plan should also identify thresholds and adaptive management triggers should monitoring indicate unanticipated change.
19. **Appendix F, Page F-3** - It is noted in the Significant Wildlife Habitat (SWH) assessment that no turtle nesting habitat is present. However, turtles are known to be within the wetlands on site and will frequently nest in cleared edges or even within portions of agricultural fields. Please provide details on why targeted turtle nesting surveys were not completed.

Until the above items are addressed, the conclusion that the proposed development will result in **no negative impacts to natural heritage features or Species at Risk** is not fully supported. The requested information is necessary to demonstrate policy conformity, regulatory compliance, and long-term protection of significant features and functions.

Please do not hesitate to contact the undersigned with any questions on the above.



Sincerely,



Summer Graham, BSc, Eco Mgmt Tech, ISA
Ecologist - Restoration



Todd Fell, OALA, CSLA, CERP
Principal, Manager of Landscape
Architecture



February 12, 2026

GEI Project No. 2501655 – 125006-013

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

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

Re: ZBA 1st Submission
4275 Concession Road 7 (CBM Safarik Pit)
Puslinch, ON

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed first submission documents for a Zoning By-Law Amendment application received on December 5, 2025, and January 23, 2026, in support of a proposed aggregate operation on the subject lands located at 4275 Concession Road 7 in the Township of Puslinch. CBM Aggregates refers to the proposed aggregate operation as “Safarik Pit” and has applied for a Class A Licence under the Aggregate Resources Act (ARA) with the Ministry of Natural Resources (MNR).

It is our understanding that the proposal is for a below water table aggregate extraction pit accessed from three entrances on Concession Road 7. A hydro corridor bisects the property, and regulated wetlands and woodland are located on the subject lands. The future Highway 6 bypass is adjacent to the subject lands.

1. Documents Received

All plans and studies required from an engineering perspective have been submitted.

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

- Cover Letter, prepared by MHBC, dated November 27, 2025.
- Plan of Survey, prepared by Delph & Jenkins North, dated February 17, 2023.
- BMPP for the Control of Fugitive Dust, prepared by WSP, dated October 2025.
- Level One and Two Water Report, prepared by WSP, dated October 2025.
- Maximum Predicted Water Table Report, prepared by WSP, dated October 2025.

- Site Plan drawings by MHBC dated November 2025:
 - 1 – Existing Features Plan
 - 2 – Operational Plan
 - 3 – Operational Notes Plan
 - 4 – Rehabilitation Plan
 - 5 – Cross Sections Plan

We defer detailed review of the following documents to Township staff and other consultants (a high-level review has been completed by GEI to ensure consistency between documents and drawings):

- Parcel Register for PIN dated October 2024.
- Confirmation of Ownership Letter, prepared by St. Mary's Cement, dated November 2025.
- Cultural Heritage Report, prepared by WSP, dated July 2025.
- Traffic Impact Study, prepared by T.Y. Lin, dated August 2025.
- Stage 1 and 2 Archaeological Assessment, prepared by WSP, dated September 2025.
- Natural Environment Report, prepared by WSP, dated September 2025.
- Heritage Impact Assessment, prepared by WSP, dated October 2025.
- Noise Assessment Report, prepared by WSP, dated November 2025.
- Planning Report & ARA Summary Statement, prepared by MHBC, dated November 2025.
- Source Water Protection Screening Form, dated November 24, 2025.

2. Additional Documents Required

All plans and studies required from an engineering perspective have been submitted and additional documents are not required to support the zoning bylaw amendment application.

3. Technical Comments

No.	Matter	Document	Comment
1.	Sightline Analysis	Traffic Impact Study	A topographical survey of the Concession Road 7 centreline in several hundred metres each direction (distance to be determined by the analysis) is required to be completed for each entrance to support the sightline analysis.
2.	Haul Route	Traffic Impact Study	Concession Road 7 from Concession Road 2 south to Concession Road 1 is Township Asset ID #114. It has a single 60 mm lift of HL4 and is noted as a class 4 road in the Puslinch Road Management Plan and not a truck route. Therefore, the length of Concession Road 7 from the Operational Entrance/Exit north to Concession Road 2 will

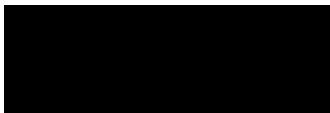
No.	Matter	Document	Comment
			need to be upgraded to a truck route. As identified by the Township Transportation Consultant, a geotechnical investigation will be required as part of this zoning bylaw amendment application to determine what improvements need to be made to Concession Road 7 to accommodate trucks between the site and the McNally pit and to extend the haul route to serve the site. Off-site road improvements need to be identified and secured through the Zoning By-law Amendment process. In addition, per the Township Transportation Consultant, regulatory signage should be identified as part of this application that would restrict trucks from using roads not identified as a haul route (for example a left turn restriction for trucks out of the site).
3.	Acoustic Berms	Noise Assessment Report	Section 8.0 of the Noise Impact Assessment states that a 7.5 m high, 237 m long L-shaped berm is to be installed west of Area A. This berm is actually to be located west of Area B. The location on the drawings and Note L on Drawing 3 of 5 is correct. The Noise Impact Assessment also refers to windrow berms 4.5 m high to be used during below water extraction within Operation Control Area 2. Is the Optional Storage Berm shown on Drawing 2 of 5 an example of a windrow berm for acoustical mitigation purposes? If so, can it be labelled as such?
4.	Dripline Setback	Site Plans	The typical berm detail on Drawing 2 of 5 should be updated to show the minimum 5 m setback from the dripline of trees to protect the critical root zone.
5.	Hydro Corridor	Site Plans	How will the hydro corridor be accessed during the rehabilitation phase? Can you show a suitably wide and graded access route around the lake in Area B? Has Hydro One been consulted yet? When available please provide their conditions for operations and rehabilitation in the vicinity of their infrastructure.
6.	Barn and Farmhouse	Heritage Impact Assessment	The Heritage Impact Assessment recommends that a structural assessment be conducted on the barn and farmhouse to identify and address any deficiencies or deteriorations compromising the structural integrity of each structure, and that yearly inspections be conducted on the barn and farmhouse to prevent demolition by neglect. Please provide inspection results to the Township on an ongoing basis, as available.

No.	Matter	Document	Comment
7.	Mud Mats or Alternatives	Site Plans	Please show mud mats, grizzly bars, or similar alternatives at all operational exits, to prevent mud tracking on the municipal right of way. Please provide a detail for the chosen mitigation.
8.	Sediment and Erosion Control	Site Plans	Please provide a detail for the sediment and erosion controls to be installed around the wetlands and woodlands for ecologist approval.
9.	Significant Wildlife Habitat Hedgerows	Site Plans	The site plans show significant wildlife habitat in hedgerows that are to be removed as part of the operations. The Natural Environment Report discusses when clearing and grubbing can occur but doesn't appear to discuss compensatory plantings for the operation period in detail. Is there a need for restoration and plantings around the margins of the extraction area during operations.
10.	Feature Based Water Balance	Natural Environment Report and Level One and Two Water Report	As further described by the Township Hydrogeologist and Township Ecologist, a feature-based water balance considering the surface water catchment area for each wetland feature is required. Further details will be found in the hydrogeology and ecology comments.

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



February 18, 2026

Via email

Monika Farncombe
7404 Wellington Road 34
Puslinch, ON N0B 2J0

Dear Monika Farncombe,

Re: D14-CBM Safarik Pit – Zoning By-law Amendment
4275 Concession 7, Township of Puslinch
CBM Aggregates

Grand River Conservation Authority (GRCA) staff have reviewed the above-noted Zoning By-law Amendment application which proposes to re-zone the lands from Agricultural and Natural Environment to Extractive Zone while maintaining the Natural Environment Zone and the Environmental Protection overlay on the subject property. The proposed zoning would facilitate the future below water table aggregate extraction use.

GRCA staff are aware that a future Aggregate Resources Act application and County of Wellington Official Plan amendment will be required to facilitate the development.

Recommendation

Grand River Conservation Authority (GRCA) staff have now had the opportunity to review the information circulated with the above-noted application. Based on our review of the materials provided, we recommend that additional information be provided prior to approval of the proposed Zoning By law Amendment, as detailed in our comments below.

Documents Reviewed by Staff

Staff have reviewed the following documents submitted with this application:

- Cover Letter Proposed Safarik Pit, prepared by MHBC Planning, November 27, 2025)Planning and Justification Report & Aggregate Resources Act Summary Statement, prepared by MHBC Planning, November 2025
- Natural Environment Report, prepared by WSP Canada Inc., September 26, 2025
- Level One and Two Water Report, prepared by WSP Canada Inc., October 10, 2025
- Existing Conditions, Operation, and Rehabilitation Plans, prepared by MHBC Planning, December 2025

GRCA Comments

GRCA has reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the *Planning Act* as per our CA Board approved policies.

Information currently available to this office indicates that the subject property contains wetlands and their associated allowance areas.

Due to the presence of the above-noted features the subject property is regulated by the GRCA under Ontario Regulation 41/24 – Prohibited Activities, Exemptions and Permits Regulation. Any future development activity or other alteration within the regulated area will require prior written approval from the GRCA in the form of a permit pursuant to Ontario Regulation 41/24. A copy of GRCA's resource mapping is attached.

Please note that Ontario Regulation 41/24 does not apply to activities approved under the Aggregate Resources Act (Conservation Authorities Act, RSO 1990, C. 27, 28(10)). As such, any development activity approved under the Aggregated Resources Act and occurring within the identified regulated areas will not require a permit from the GRCA under Ontario Regulation 41/24.

It is our understanding that the application proposes to amend the Township of Puslinch's Zoning By-law to permit an Extractive Zone on the property. The proposal will facilitate a future below water table pit. No processing or water-taking activities are currently proposed on-site.

GRCA staff request the following comments be addressed:

1. The proposed Rehabilitation Plan cross-sections (Drawing No.4 & 5) appear to show that proposed rehabilitated pond side slopes (below water level [WL] +/- 309.2) have 2:1 slope. In general, stable slopes should likely have slopes of 3:1 otherwise it may be prone to erosion. The consultant may need to clarify potential erosion impacts.
2. Wetland boundaries within 30 m of the proposed extraction limits should be delineated (flagged or staked) when site conditions are appropriate (i.e. typically between May 1 and October 15). A site visit should be scheduled so that the GRCA can verify staked wetland boundaries. Verified wetland boundaries should be surveyed by WSP or a qualified Ontario Land Surveyor. A digital file depicting surveyed wetland boundaries should be forwarded to the GRCA for review.
3. Operational and rehabilitation plans should be revised, as necessary, based on the results of the wetland delineation exercise.
4. Please provide a monthly, features-based water balance assessment for the wetlands contained within the site. The water balance assessment suggests that annual and seasonal surface runoff volumes will be reduced by approximately 70% during the extraction period and that this reduction will persist after rehabilitation. According to the Level 2 Water Report, "adverse impacts to the local wetland features is not predicted" (Section 4.2.2, page 19). The basis for this assertion is unclear. A features-based water balance assessment is recommended to determine the degree to which the wetlands are currently sustained by and could be adversely impacted by a reduction in surface runoff.
5. The proposed 10 m extraction setback from the wetlands is likely not sufficient to maintain wetland hydrology and hydroperiods. The requested features-based water balance is needed to quantify hydrologic impacts at the catchment scale and to demonstrate no adverse impact on the form or function of the adjacent wetlands. If the annual water balance within sub-catchments cannot be maintained, then a monthly water balance analysis should be completed for all affected wetlands. Tabular results and wetland hydrographs are recommended.
6. The monitoring plan outlined in the Level 2 Water Report is supported. We recommend that water levels within all wetlands within or immediately adjacent to the licenced area be monitored continuously, that trigger levels be established prior to below water

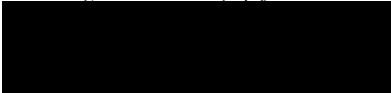
extraction, and that appropriate measures be implemented when necessary to mitigate impacts within the adjacent wetlands.

7. The placement of noise berms within the recommended 10 m setback is not supported as this would restrict runoff toward the wetlands.
8. We recommend that heavy-duty fencing be placed along the recommended 10 m wetland setback instead of at the wetland dripline. As discussed above, this setback should be increased where necessary to maintain surface flow toward the wetlands. Please revise note 2b on Sheet 3.
9. Because the final, effective setbacks from the wetlands could be greater than 10 m in some areas, we further recommend that the entire width of the wetland buffer zone within the licensed area be restored or enhanced, where warranted, with suitable vegetation.
10. Please include a comment response letter, detailing how each comment has been addressed.

Consistent with GRCA's 2023-2025 approved fee schedule, this application is considered a Below Water Table Aggregate Application. GRCA staff acknowledge receipt of the fee amount of \$42,850 for the GRCA's review of this application.

Should you have any questions, please contact Brandon Henderson at 519-621-2763 ext. 2327 or bhenderson@grandriver.ca.

Sincerely,



Chris Foster-Pengelly, M.Sc.
Supervisor of Planning and Regulations
Grand River Conservation Authority

Enclosed: GRCA Mapping

Copy: CBM Aggregates (owner), MHBC Planning (agent)



Grand River Conservation Authority

Date: Dec 18, 2025
Author: Ismet Esgin Zorlu

4275 Concession 7

Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)
 - Engineered
 - Estimated
 - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
 - Steep
 - Oversteep
 - Toe
- Slope Valley (GRCA)
 - Steep
 - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Conservation Area Boundary (GRCA)

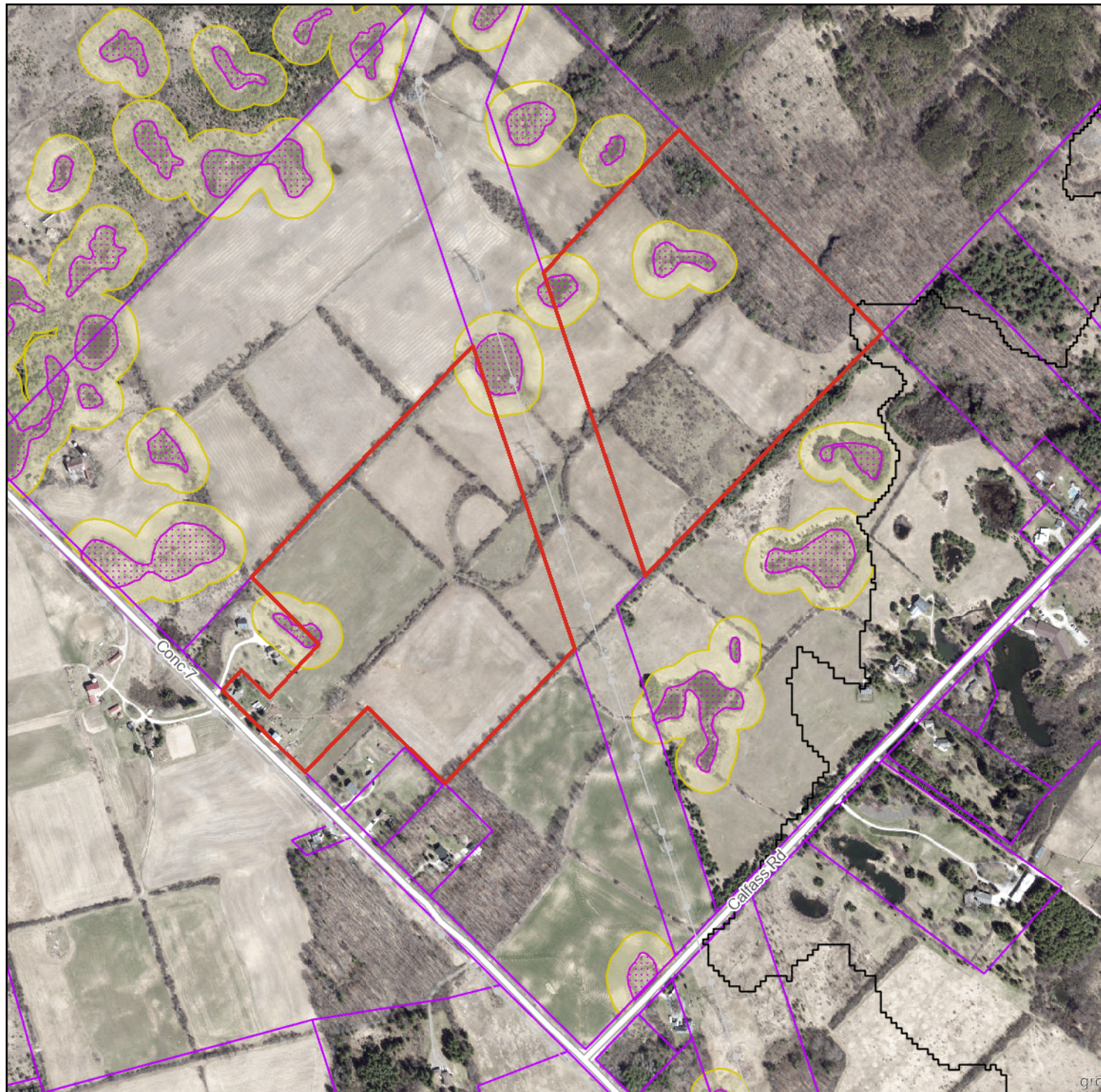
Copyright Grand River Conservation Authority, 2025.

Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.

The source for each data layer is shown in parentheses in the map legend. See [Sources and Citations](#) for details.

Scale 1:8,055

NAD83 UTM zone 17 (EPSG:26917)



March 20, 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 Safarik Pit

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 Part of Lot 29, Concession 7 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 Safarik Pit.

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 Safarik Pit, prepared by WSP Canada Inc., dated October 2025 ("Dust BMPP");
2. Noise Assessment for Proposed Safarik Pit, prepared by WSP Canada Inc., dated November 2025 ("Noise Report");
3. Planning Justification Report & Aggregate Resources Act Summary Statement, CBM Aggregates, a Division of St. Marys Cement Inc. (Canada), Safarik Pit, by MacNaughton Hermesen Britton Clarkson Planning Limited (MHBC), dated November 2025 ("Planning Report");
4. Cover Letter To Justine Brotherston, Director Corporate Services, Township of Puslinch from MHBC, CBM Aggregates, A Division of St. Marys Cement Inc. (Canada), Proposed Safarik Pit, Township of Puslinch Zoning By-Law Amendment, dated November 27, 2025 ("Cover Letter"); and,
5. Site Plans for Safarik Pit, by MHBC Planning, Urban Design & Landscape Architecture, for Submittal to MNR, dated November 2025 ("Site Plans").

Vooren Air Quality Management Services Inc.
17 Christman Court
Markham, ON, L3P 3C7, Canada
289-242-5086

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. 40% of the aggregate resources is located below water. 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 a dragline. 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.

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 references to air quality impacts are found in the Planning Report, indicating that *"This area of the County and Township is characterized by higher levels of aggregate activities; surrounding agricultural uses are accustomed to the operational procedures associated with mineral resource extraction"* and *"The review concluded that, subject to the implementation of the proposed mitigation measures regarding water quality and quantity, noise, dust, and traffic, there are no anticipated impacts to the agricultural system as a result of the proposed pit"*. 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.

We do recommend that in future, applications for aggregate pits include an air quality study, or at minimum an opinion by a qualified air quality consultant indicating the anticipated dust impacts.

Our review of the application documents found the following:

1. Control of possible silt and mud track-out. The Site Plans do not show a paved entrance to the pit. A paved entrance would help minimize track-out of mud and silt to the Concession Road 7. **We recommend that CBM include a paved section at the operational exit to the proposed pit to minimize track-out from the Site.**

2. 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, Table 4, Table 6 or Appendix A (Risk Ranking). Table 3 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 also be updated should also include appropriate tracking logs for mitigation activities on the paved entrance.**
3. Even with the inclusion of a paved entrance, track-out of silt and mud can still occur to Concession Road 7. The current BMPP does not consider cleaning or managing potential track-out from the site. 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 track-out on Concession Road 7, including at a minimum, the requirements stipulated by By-Law 2023-058.**

The Dust BMPP must be updated to provide a discussion concerning paved roads and best practices mitigation for the recommended on-site paved operational exit and surface cleaning maintenance of Concession Road 7. The Dust BMPP update should also include appropriate tracking logs for mitigation activities on the paved surfaces.

4. 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 Safarik Pit" October 2025 (Source: WSP Canada Inc.)* The Site Plan indicates a specific version by date, of the Dust BMPP. The Dust BMPP does not indicate any options or process for revisions to the Dust BMPP. As a result, any revisions to the Dust BMPP would establish a new date for the Dust BMPP and as a result, require a Site Plan amendment to reflect the revised Dust BMPP. This approach is an appropriate mechanism for manage any updates of the Dust BMPP and should not be changed.
5. The Dust BMPP 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 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.**

6. In Sections 3.1.3 and Section 4.4 of the Dust BMPP it is indicated that site personnel and/or contractors should monitor dust emissions/generation on a daily basis, and records of dust observations shall be noted on the Dust Control Inspection Form in Appendix C. The Dust Control Inspection form states that it is for weekly inspections, not daily. As well, it is only in the weekly dust inspection form that the question is asked “*is visible dust observed from any section of roadway?*”. A weekly 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 of the Dust BMPP but lacks necessary detail. The procedure indicates applying at least 1 litre/m² of water after 24 hours of dryness. No frequency is provided nor is “dryness” defined. **Section 3.1.3 and Section 4.4 of 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) and the training section (Section 4.3.1) of the Dust BMPP.**

7. The Dust BMPP has a Dust Control Inspection Form, Weekly Inspection for “Concrete Cutting and Grinding” in Appendix C. There is no other discussion of concrete cutting and grinding in the Dust BMPP or Noise Report. The form is likely a left over from a previous version of a dust BMPP for another location. **We recommend this form be removed from the Dust BMPP.**
8. 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. **Given the immediate requirement of watering when dust plumes are noticeable on-site, CMP must maintain an on-site watering truck and operator.**

The watering truck must also be capable of spraying and cleaning tracked materials on the paved entrance section (see 3 above).

As well, since material will be stockpiled and subject to drying, the watering truck must me equipped with a water cannon to water the stockpiles if dust plumes are noted during material handling.

Similar considerations for timing of mitigation will need to be developed for the recommended paved entrance and Concession Road 7. While it is not anticipated that CMP would maintain an

appropriate paved road sweeper at site, it is important that CMP commit to ensuring any contracted sweeping, for both the recommended paved entrance and Concession Road 7, be available on a quick response contract. **Further details on contracted sweeping response times and requirements should be included in the Dust BMPP.**

9. The Dust BMPP provides a procedure for handling complaints in Section 4.3.2.. The Dust BMPP and Site Plans are 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. **We recommend that the Dust BMPP and the Site Plans be updated to include appropriate signage and mechanisms for complaints to be received.**

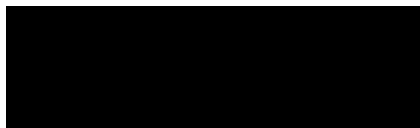
Conclusions and Recommendations

The proposed Safarik Pit can be operated with minimal air quality impacts to the surrounding area if the emissions from the operations at the site are well controlled. A detailed Dust Best Management Practices Plan is required, and must be adhered to, to ensure appropriate and timely mitigation of dust emissions. The current Dust BMPP, which is 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 is premature to conclude that the Safarik 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.

Cc : Joe Nethery - Nethery Planning



SALVINI
CONSULTING
Transportation Engineering and Planning

Salvini Consulting Inc.
Kitchener, ON
519-591-0426
julia@salviniconsulting.com

March 16, 2026

Monika Farncombe
Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Road 34
Puslinch, ON · N0B 2J0

Re: 4275 Concession 7
2377482 Ontario Inc. (CBM Aggregates, a division of St. Marys Cement Inc. (Canada))
Zoning By-law Amendment Application, 1st Technical Review
Township Transportation Peer Review Comments

Dear Monika,

I have reviewed the application for the Zoning By-law Amendment for the subject site and the Traffic Impact Study (TIS) that was submitted with the application. A TIS was prepared by TYLin and dated August 2025. The following comments are provided as my first technical review of the application.

1. Base traffic data at the study area intersections was collected in June 2024 and is acceptable.
2. Background traffic volumes were calculated by adding background growth to through volumes on CR7, CR2 and McLean Road and also adding traffic from a proposed CBM feeder pit on CR2 west of the McNally pit. Background growth should be added to all traffic other than turning traffic at the pit entrances. In addition, the background traffic from the CR2 pit was improperly applied through the study area and results in additional traffic along CR7.
3. Site traffic was estimated at 14 truck trips in and out in both peak hours based on the capacity of the loader at the subject site. The consultant should confirm if there is additional traffic related to other site activities and staff in the weekday peak hours. The trip distribution and assignment are acceptable.
4. The assessment includes a review of the warrant criteria for left turn lanes at the entry to the McNally pit (northbound left turn from CR7) and at the entry to the subject site (southbound left turn from CR7). Adjustments were made for truck traffic. It appears the advancing volumes in the PM peak hour at the McNally pit were not calculated correctly. In addition, although the numbers on the warrant graphs are (mostly) correct, the lines are not shown in the correct location on the graphs. It does not appear that correcting the volumes in the PM peak hour at the McNally pit or moving the lines on

the graphs will change the outcome of the assessment, however, with a resubmission of the TIS, the assessment should be updated.

5. As previously commented, the sightline analysis has not been completed correctly. New driveway connections are required to provide left turn from stop intersection sight distance in both directions in accordance with guidance in the TAC Geometric Design Guide for Canadian Roads. Diagrams illustrating how the required sightlines are provided for the appropriate design vehicles need to be included both in plan and in profile for both proposed driveways. The design vehicles should include both a passenger car and the design truck – whatever the largest truck is that is regularly in use at the site. Separate diagrams will be required for the passenger car and the design truck because the required distance and the eye height are different for both. The consultant is welcome to reach out to me to discuss the sightline analysis in more detail if they would like further information.
6. The study indicates that CR7 is a haul route. My understanding is that CR7 is a haul route north of CR2A, but that south of CR2A it was recently reconstructed with a single lift of asphalt and is not designated as a haul route. A geotechnical investigation will be required as part of this application to determine what improvements need to be made to CR7 to accommodate trucks between the site and the McNally pit and to extend the haul route to serve the site. Regulatory signage should be identified as part of this application that would restrict trucks from using roads not identified as a haul route (for example a left turn restriction for trucks out of the site). Off-site road improvements need to be identified and secured through the Zoning By-law Amendment process.

I am not yet prepared to support the application from a transportation perspective. An updated Traffic Impact Study is required to address the comments above.

Please let me know if you have any further questions about my preliminary review of the application.

Sincerely,

[Redacted Signature]

Julia Salvini MEng, PEng, FITE
President

Cc: Mike Fowler, Justine Brotherston, Township of Puslinch
Joe Nethery, Nethery Planning
Andrea Reed, GEI Consultants



February 18, 2026

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

Attention: Monika Farncombe
mfarncombe@puslinch.ca

VIA E-MAIL

**Re: Peer Review of Noise Assessment Report
Proposed Safarik Pit
Puslinch, Ontario
VCL File: R257210.0084**

Dear Ms. Farncombe:

We have completed our review of "*Report - Noise Assessment Report, Proposed Safarik Pit, CBM Aggregates (CBM), a division of St. Marys Cement Inc. (Canada)*", dated November 2025, prepared by WSP Canada Inc. (WSP).

To assist with the review of the Noise Assessment Report, the following were also referred to:

- "*Traffic Impact Study, CBM Safarik Pit*", dated August 2025, prepared by T.Y. Lin International Canada Inc. (TYLin).
- ARA Site Plans, dated November 2025, prepared by MHBC Planning, Urban Design & Landscape Architecture.

Our comments are outlined herein.

- a) The Noise Impact Study (NIS) has appropriately applied the Ministry of Environment, Conservation and Parks (MECP) noise guidelines. All of the noise sensitive receptors are deemed to be in a Class 3 area. The Class 3 exclusion limit has been applied at all of the receptors. This is considered appropriate.
- b) The NIS should also discuss the requirements of the Township of Puslinch Noise By-Law No. 5001-05 and confirm those requirements are also met.
- c) There are a few items that require some additional clarification before we can agree with the findings and recommendations of the noise impact study:
 - a. Both above and below water extraction can occur concurrently. How were the worst-case extraction locations determined? In particular, how were the concurrent extraction locations determined to ensure the predictable worst-case sound levels were determined by the noise impact assessment.

- b. The way Table 1: Site Noise Source Summary currently reads, two draglines would be permitted to operate on the site simultaneously. Review of the notes on the Site Plans, the description in the NIS and the sample calculations seem to indicate that only one dragline would operate at any time. Clarification is needed.
- c. The paragraph below Table 1 in the NIS states that the sound power level does not account for adjustments that were included in the modelling. Details of these adjustments need to be outlined in the NIS.
- d. Table 2: Points of Reception in the NIS has a heading Noise Limit Daytime/Nighttime (dBA). However, only the daytime exclusion limit for a Class 3 area is provided in the table. The evening/nighttime limit should be added to the table.
- e. Section 6.1.1 of the NIS states that the analysis was completed using CadnaA 2025 which relies on ISO 9613 (part 2). ISO 9613-2 was updated in 2024. Reference to the version of ISO 9613-2 used to complete the assessment is needed.
- f. Section 6.1.2 of the NIS outlines “some of the assumptions” used to complete the assessment. What other assumptions were made to complete the assessment?
- g. The first bullet in Section 6.1.2 of the NIS states that the sound emission levels for equipment used for construction and rehabilitation are expected to meet the limits in MECP NPC-115. This should be included as a noise control recommendation.
- h. In the sixth bullet in Section 6.1.2 of the NIS, it is not clear what “or acoustically equivalent” means in the context of the equipment list and the sound power limits provided in Table 1. Clarification is needed.
- i. The noise mitigation recommendation for Operation Control Area 2 in Section 6.1.3 of the NIS requires the loader for below water table extraction to operate east of a 4.5 m barrier. The NIS should also provide the recommended length of barrier along with the maximum distance from the barrier to the loader.

The executive summary refers to 4.5 m high windrow barriers. Is the 4.5 m barrier recommended for Operation Control Area 2 the same as the windrow barriers? If not, where are the windrow barriers to be located? These should be shown on the Site Plans.

- j. Section 6.1.4 of the NIS defers the completion of the haul route noise analysis to until after the proposed pit has been approved and just before the commencement of operations. This is not considered appropriate. The results of the haul route noise impact assessment are needed to allow the Township to understand all of the potential noise impacts resulting from the proposed undertaking. Thus, the omission of the haul route noise impact assessment makes the NIS incomplete.
- k. Regarding Section 8.0 Site Plan Noise Control Notes of the NIS:

- (1) The first bullet/recommendation should be reworded to clearly state the limits referred to are the maximum number of each equipment type and the maximum sound power level. Both must not be exceeded.
 - (2) To be consistent with the second bullet, B. Hours of Operation note 2 on the Site Plans should be revised to state construction and rehabilitation are not permitted on statutory holidays.
 - (3) The recommendation in the fourth bullet should be revised as per the comments in a) i. above.
 - (4) The recommendation for a noise audit is that it be done once below water extraction is occurring in Area B. Below water extraction in Area B is the last phase of operations at the proposed pit. Since the worst-case sound levels at POR001 and many of the other receptors are relatively uniform over the life of the pit (Table 5), it is recommended that the audit be done as soon as possible after the extraction operations have commenced at the pit.
 - (5) If there are any changes to operations or mitigation at the pit, the Township should also be made aware of the changes. This will help to respond to any concerns that may be raised regarding the pit operations.
 - (6) Since the amount of sound level reduction provided by the working face is dependent on the face height and the distance the equipment operates from the working face, a recommendation is needed that states the minimum first lift face height, the maximum distance the equipment can operate from the pit face and the direction this screening is to be provided. The notes currently only state the loader is to be within 30 m of the working face.
- I. There is an existing residential dwelling located on the gravel pit site that appears as though it will remain in place over the life of the gravel pit operation. Why was this dwelling not included as a POR?

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.



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

Groundwater Studies
Geochemistry
Phase I / II
Regional Flow Studies
Contaminant Investigations
OMB Hearings
Water Quality Sampling
Monitoring
Groundwater Protection
Studies
Groundwater Modelling
Groundwater Mapping

File: 2527

February 26, 2026

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

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

Attention: Monika Farncombe

Re: ZBA 1st Submission 4275 Concession Road 7 (CBM Safarik Pit)
Puslinch, ON

Dear Ms. Farncombe:

Documents Reviewed:

- 1) Maximum Predicted Water Table Report, WSP, October 2, 2025
- 2) CBM Safarik Pit ARA Site Plans MHBC November 2025
- 3) Safarik-Level 2 Water Report_WSP - 10Oct2025_

Our specific comments are as follows:

- 1) We do not have significant concerns with the proposed below water table extraction with respect to private water well use. The below water table extraction is unlikely to impact on either the quantity or quality of nearby private water well use. The applicant has offered to monitor three downgradient wells with a data logger. We suggest that homeowners accept that offer if they have concern about their water level, otherwise, it is our opinion that the on-site monitoring will be adequate and less disruptive.
- 2) Additional detail is required on the extent of surface water catchment reductions for the on-site and near site wetlands. Feature based water balances that evaluate the reduction in surface capture area should be prepared.
- 3) We have no concerns with the Maximum Predicted Water Table Report.

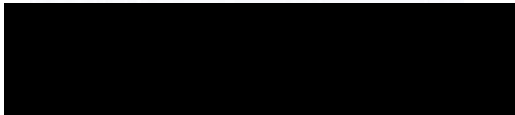


- 4) We have concerns related to the deposition of silt at the McNally Pit. The siltation areas approved through the 2024 Ontario Land Tribunal hearing have now been filled. A January 2024 modeling report on the filling of additional areas of the McNally Report has been presented to the Township with the Aberfoyle South Lake Pit supporting documentation. To our knowledge, this report has not been submitted to the Township or Ministry of Natural Resources and Forestry in support of an amendment for the McNally Site. For this reason, a letter of objection to the issuance of a license for this pit should be sent by the Township to the Ministry of Natural Resources and Forestry.
- 5) The site is located at an intermediate part of the groundwater flow system (neither head water nor discharge). The main hydrologic function of the pit is groundwater recharge, given the hummocky terrain. This function will not change.
- 6) There will be no aggregate processing at this site thus no permit to take water is being proposed or considered.
- 7) We are recommending that the applicant evaluate the cumulative impact of 1) the below water table extraction and 2) increased surface water coverage (increase in evaporation) in this reach of Mill Creek.
- 8) We have no concern related to thermal impacts on groundwater from this pit.
- 9) This site proposes an additional one million tonnes of aggregate removal from below the water table. We recommend that CBM take the opportunity to put the three active groundwater models (Lake Pit, McNally Silt Filling and Safarik) together to evaluate the impacts of below water table extraction at all of their pits in the Aberfoyle mining area as well as the infilling of McNally Pit with silt. The model for the Safarik Pit ignores existing mining in the Neubauer, Puslinch PQA, McNally, Lanci and Dufferin's Mill Creek Aggregates. This can easily be done to address cumulative impacts from all the active pits including this one and the proposed Lake Pit. There is clearly an issue with the model calibration where all the predicted water levels are higher than measured. The use of constant head boundaries along the crest of the moraine (subwatershed boundary) diminishes the usefulness of the model. We recommend extending the model boundary to the downgradient edge of the Galt Moraine, where Fletcher Creek and Spencer Creek emerge from the base of the moraine.
- 10) We recommend that the Township consider requesting the applicant to stay above the water table at the Safarik Pit until below water table mining is completed in the Lanci, Puslinch and Neubauer Pits. This is related to the cumulative impact of several below water table extractive operations mining at the same time. Potentially, there could be the Aberfoyle South Lake Pit, Dufferin's Mil Creek pit, Lanci Pit, Puslinch CBM Pit, Neubauer and McNally pits operating below the water table at the same time.



- 11) Details of groundwater monitoring should be put onto the site plan. This is Table 10 of the Water Report.

Respectfully Submitted,
Harden Environmental Services Ltd.



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





Outlook

MTO comments Feb 10, 2026

From HCMS@ontario.ca <HCMS@ontario.ca>**Date** Wed 4/1/2026 9:38 AM**To** Planning <planning@puslinch.ca>

The Ministry of Transportation (MTO) has completed a cursory review of the municipal file D14/CBM(Safarik Pit) for property located 4275 Concession 7, in the Township of Puslinch. The files has been considered in accordance with the *Public Transportation and Highway Improvement Act* (PTHIA), MTO's Highway Corridor Management Manual (HCMM) and all related guidelines and policies. The following outlines our comments:

MTO has no objections with the proposed ZBA for the subject property to rezone the the proposed Safarik Pit from an Agriculture (A) and Natural Environment (NE) to Extractive (EXI) and Natural Environment (NE). However, please advise the proponents of the following comments:

The owner should be aware that a portion of the subject property falls (A) within the MTO's Permit Control Area (PCA) due to the approved future Highway 6 By-pass project located to the east of the property. As a result, MTO permits may be required prior to any demolition, grading, construction, or alteration taking place on the site. In accordance with the Ontario Building Code, municipal permits may not be issued until such time as all other applicable requirements (i.e.: MTO permits/approvals) are satisfied. As a condition of MTO permit(s) MTO will require the following for review approval:

- MTO requires an off set of 30m of the MTO property limit all pits and quarries activities.
- MTO may require enhanced offsets or additional requirements once the Highway 6 design team has completed a comprehensive review.

The Ministry of Transportation (MTO) reserves the right to provide additional comments, conditions, or requirements once a comprehensive review is completed.

Thank you,

O'Neil Nembhard
Corridor Management Planner
Highway Corridor Management
Ministry of Transportation of Ontario