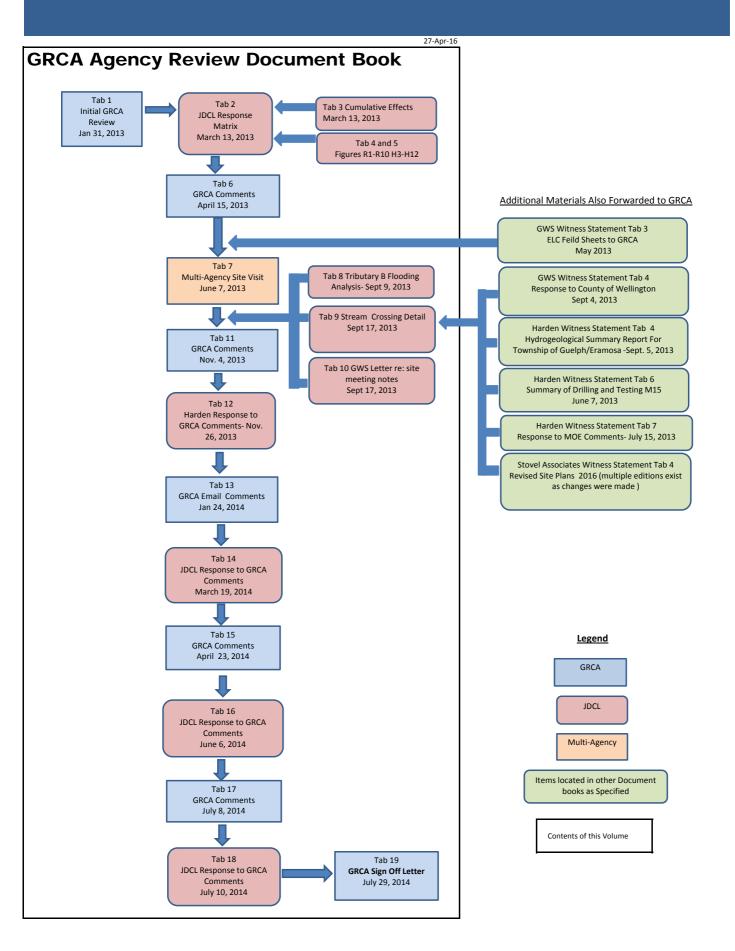
Evidence Book 5



Township of Guelph/Eramosa GRCA Agency Review Document Book Index

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RE:

400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

PLAN REVIEW REPORT: Township of Guelph Eramosa Janice Sheppard, CAO

DATE:January 31, 2013GRCA FILE:Wellington/GuelphEramosa/2012/ZC/C

YOUR FILE: ZBA09/2012

Application for Zoning By-Law Amendment 8352 Highway 7 Part lot 1, Concession 6, Township of Guelph/Eramosa 634745 Ontario Limited / James Dick Construction Limited

GRCA COMMENT: *

The Grand River Conservation Authority (GRCA) recommends deferral of this application. Our comments should be addressed and a site visit to be scheduled between the Township, GRCA Staff and the proponents at the appropriate time of year prior to our support of this application.

BACKGROUND:

1. Resource Issues:

Information currently available at our office indicates the lands to be rezoned contain Provincially Significant Blue Springs Creek Wetland Complex, a tributary of Blue Spring Creek, associated floodplain and the allowances to these features.

Please be advised that the subject lands also contain a significant woodland feature that has been identified as part of the Core Greenland System within the County of Wellington Official Plan.

2. Legislative/Policy Requirements and Implications:

A licence is required for aggregate extraction on private lands in areas designated under the Aggregate Resources Act. It is our understanding the entire property is to be licenced and the proponents will be applying for a Class A, Category 2 License for below ground water extraction.

3. Additional Information/Suggestions provided in an advisory capacity:

GRCA Staff have reviewed the above noted application along with the following documentation:

- Planning Report, prepared by Stovel and Associates Inc., Date September 2012;
- Site Plan Drawings, by Stovel and Associates Inc., dated September 21,2012:
 Page 1 of 5, Existing Features

- Page 2 of 5, Operations Plan
- Page 3 of 5, Quarry Phasing
- Page 4 of 5, Cross Sections
- Page 5 of 5, Cross Sections
- Level II Natural Environment Technical Report, Prepared by GWS Ecological & Forestry Services Inc., dated August 2012; and
- Level I and II Hydrogeological Investigation, prepared by Harden Environmental Services Ltd,. date September 2012.

We offer the following comments based on the reports submitted with this application as GRCA Staff have not been on-site.

- 1. As of January 2011, the GRCA is requesting that all below-water sand and gravel operations in priority subwatersheds conduct a cumulative effects assessment in accordance with *Cumulative Effects Assessment (Water Quality and Quantity) Best Practices Paper for Below-Water Sand and Gravel Extraction Operations in Priority Subwatersheds in the Grand River Watershed September 2010.* This document was jointly authored by the Ministry of Natural Resources, the Ontario Stone, Sand, and Gravel Association, the Ministry of the Environment, and the GRCA. While the assessment was not specifically intended to address quarry operations, it is in a priority subwatershed (the Eramosa River subwatershed). As such, we request that the Best Practices document be applied as part of this application.
- 2. We note that no mention is made of the floodplain mapped on this property in the Hydrogeological Investigation. Mapping available from GRCA's WebGIS outlines a 40m wide estimated floodplain along the Blue Springs Creek tributary (Tributary B) that passes through the property (20m on each side). Estimated floodplains were identified for rural areas having drainage areas of about 100 hectares or more, which, based on water course delineation provided on MNR mapping at the time of estimation (1995-2000) was the case for the subject property.

Since this tributary combines with another at Highway 7, just downstream of the property, there is a need to confirm the elevation of a backwater floodplain from that point and to demonstrate that the proposed excavation boundaries remain outside of the creek buffers. Please map this and confirm that excavation boundaries and proposed buffers are beyond this elevation. If this results in conflict, the boundaries can be moved accordingly or alternatively a hydrologic analysis may be carried out to generate a regulatory event runoff rate and volume. This can be compared to available storage stages and volumes within the landscape above Highway 7 in order to evaluate a possibly lower backwater elevation. The main concern here is that a severe storm of Hurricane Hazel's magnitude should not result in the tributary creating a new path into excavated areas that are proposed at much lower elevations than the nearby creek bed.

3. In the Natural Environment Technical Report, the limit of the creek and its associated floodplain that was identified in the report needs to be determined. A fluvial geomorphologic assessment is typically required by the GRCA to establish the meander belt width and setback requirements. This study

should also provide recommendations to minimize the impact associated with the proposed stream crossing.

- 4. According to the groundwater model in the Natural Environment Technical Report (see page 7), "the maximum magnitude of water level change in the bedrock aquifer is a decline of 1.8 metres at the northern Site boundary and a rise of 1.5 metres at the southern Site boundary. The magnitude of groundwater drawdown at the northwest wetland ranges from 1.1 to 1.9 metres for the maximum extraction scenario. The average drawdown value of 1.53 metres should be used to estimate the increase in groundwater flux beneath the wetland and area up-gradient of the proposed hydraulic barrier." This potentially represents a significant hydrologic impact that has not been fully assessed in the report and further details can be included in the updated EIS.
- 5. According to the groundwater model in the Natural Environment Technical Report (see page 7), "extraction of the north half of the west pond will result in a maximum predicted change of 0.7 metres at the northern property line, a maximum change of 0.35 metres below the northwest wetland and less than five centimeter change beneath the Rockwood Farm or Degrandis springs. The commencement of extraction in the north half of the west pond will allow for several years of monitoring to verify predicted impacts prior to extracting the south half of the west pond." We agree that monitoring is necessary and further suggest the need for groundwater triggers and contingencies to prevent significant adverse impacts before they occur. The impacts of the groundwater levels below the wetlands need to be assessed and the EIS updated accordingly.
- 6. Impacts on flow volume, peak rates, and water temperature along the intermittent creek (Tributary B) on site and other permanently flowing, cold water creeks further downstream are a major concern. On site measures to maintain or improve creek hydrology should be implemented in accordance with existing policy.
- 7. We note that groundwater will be monitored for water quality impacts resulting from quarry activities at one upgradient monitor and one downgradient monitor. Our recommendation is that the proponent considers additional monitoring locations.
- 8. It is requested that the limit of the PSW on this property be flagged at the appropriate time of year by the consultant and verified infield by the GRCA, using the protocols outlined in the Ontario Wetland Evaluation System, Southern Manual. It is also requested that the wetland boundary be surveyed and plotted on the Operational Plan.
- 9. It is proposed to remove 0.2 ha of artificially-created wetland. As indicated above, additional field review with GRCA staff is required to verify the limit of the PSW on this site and to confirm that wetland removal is in accordance with Section 2.1 of the *Provincial Policy Statement* and Section 8.4.5 of the GRCA's *Wetlands Policy*.
- 10. We agree that erosion, sediment, and dust control will be necessary on this site but suggest that the wetlands and intermittent stream would be more vulnerable than adjacent woodland areas.

Consequently, the retention of 30 m treed buffers adjacent to all wetlands and the intermittent stream is warranted for this reason alone.

- 11. The location of the proposed hydraulic barrier/silt curtain is questionable as it appears to traverse an existing wetland. It is suggested that the location be determined after the wetland boundaries have been verified in the field by the GRCA.
- 12. The use of forest inventory reporting standards and codes to describe vegetation communities is of limited use. The apparent lack of vegetation and soils information is especially problematic and provides only a limited understanding of the wetland communities on this site. The checklist of plant species in Appendix B provides information for the entire property and is also of limited use at the individual community level.
- 13. Were the soil descriptions contained in the Hydrogeological Assessment considered when classifying vegetation communities?
- 14. The Natural Environment Report confirms that the woodland on this site is approximately 33.5 ha in size, therefore is considered Significant Woodlands within the County of Wellington. The GRCA recommends that a site visit be scheduled with the County of Wellington and GRCA staff to verify the limit of the significant woodland on the subject property. The portions of the woodland that merit protection should be clearly distinguished from portions that will not be protected.
- 15. As noted in Section 7.1 of the Natural Environment Report "The woodland also lies in close proximity to other woodlands and wetlands north and east of the subject lands. As such, they provide an important linkage to these natural features." The author speculates, however, that "these functions will not be significantly affected by the proposed loss of conifer plantation from part of the site." Please provide details on how the woodlands and wetlands on adjacent lands will not be affected by the loss of the conifer plantation from the subject lands.
- 16. GRCA staff supports the retention of mature deciduous (FOD5-7) and mixed forest (FOM2-2 FOM4-2) stands on the subject property, but recommends the full retention of the mature cedar stand (FOC2-2), which currently buffers the intermittent stream. It is further suggested that plantation areas adjacent to the stream provide a buffer and wildlife corridor function, and should be retained and enhanced where practicable. Additional rationale should be provided to support the recommended 20-30 stream buffer width.
- 17. An intermittent creek and floodplain traverses the woodland area and ultimately connects two large natural areas offsite. According to the Significant Wildlife Habitat Technical Manual, animal movement corridors exist at different scales and encompass a wide variety of landscape features, including riparian zones, stream and river valleys, wetlands, and woodlands. Therefore, a wildlife movement corridor may exist across the subject property. It is recommended that the OMNR's Draft Ecoregion Criteria Schedules be consulted to determine whether or not the woodland provides significant wildlife habitat and the EIS updated accordingly.

- 18. The Natural Environment Report demonstrates that the following Significant Wildlife Habitat is present on the subject property:
 - a. Amphibian Woodland Breeding Ponds comprise a diverse frog community, formerly consisting of the provincially rare (S3) and nationally threatened Western Chorus Frog
 - b. Habitat for a Species of Conservation Concern breeding and foraging habitat for Snapping Turtle.
 - c. Breeding Habitat for area-sensitive bird species (i.e. Ruffed Grouse, Hairy Woodpecker, and Pileated Woodpecker)
 - d. Winter Habitat for Deer and Wild Turkey

The presence of these species indicates that the property contain a Significant Wildlife Habitat and the OMNR should be consulted regarding direct, indirect and induced impacts to the Significant Wildlife Habitat and the EIS updated accordingly.

- 19. We do not agree that "the subject property is not considered important for water protection as it does not represent a sensitive recharge, discharge or headwater area". Information in this office indicates that there are strong upward gradients on and adjacent to this site. A lowering of the groundwater table on this site could further reduce or eliminate groundwater inputs to these features and could potentially result in the loss of amphibian breeding areas. Please clarify what the context of this comment was indented to address.
- 20. The GRCA is supportive of the progressive and final rehabilitation plans (Section 7.6) and supports the recommended wetland restoration and enhancement plans for this site. Although the restoration or creation of additional marsh habitat on the site is supported, it will be necessary to demonstrate that the alteration of an existing wetland could be consistent with the GRCA *Wetlands Policy*.
- 21. Staff discourage the planting of ash species, which are increasingly susceptible to outbreaks of the Emerald Ash Borer.
- 22. A detailed assessment of potential impacts associated with the construction and maintenance of the proposed stream crossing and recommended mitigation measures are required. Additional detail regarding culvert length, diameter, depth, and type (CSP or box culvert) are required.
- 23. Figures 10, 11, and 12 are missing from the Level 2 report and should be forwarded to this office for our review.

As an Aggregate Act application will be submitted in conjunction with this Zoning By-law Amendment for review by GRCA Staff, the plan review fees for a *Below the Water Table* Aggregate Act Application with features of interest within 120 metres of license limit is \$35,000 and the applicant will be invoiced accordingly.

We trust these comments are of assistance. Should you have any further questions, please contact Heather Ireland 519-621-2763 ext. 2320.

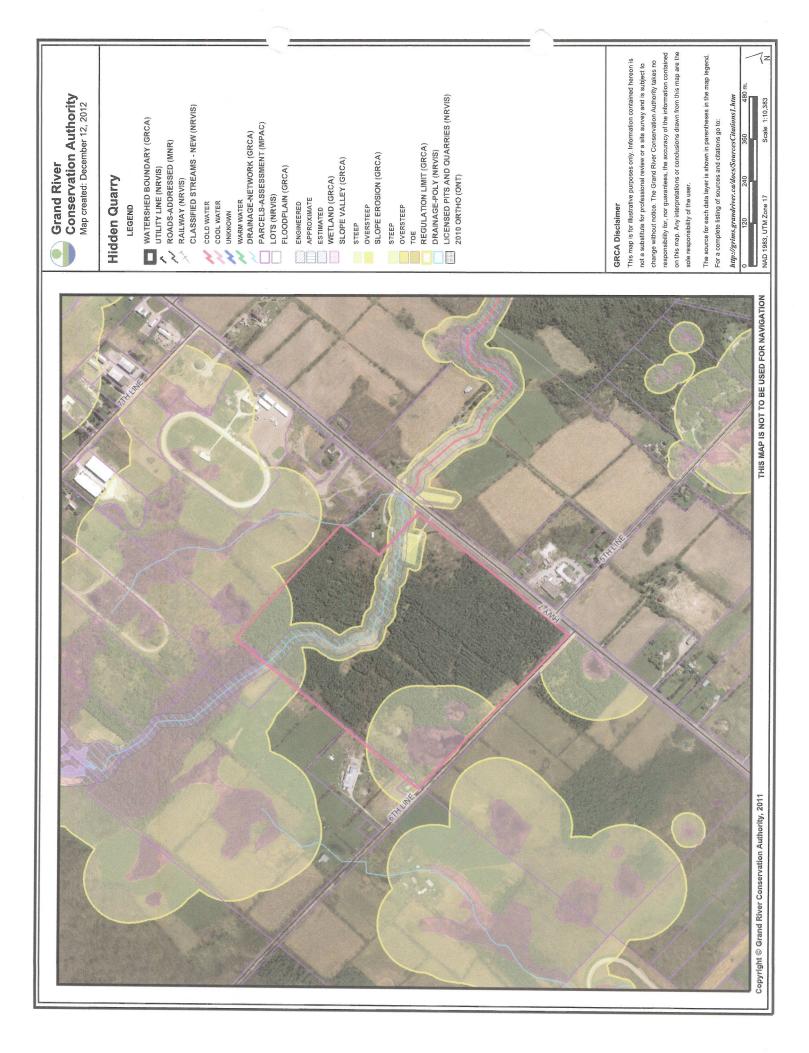
Yours truly,

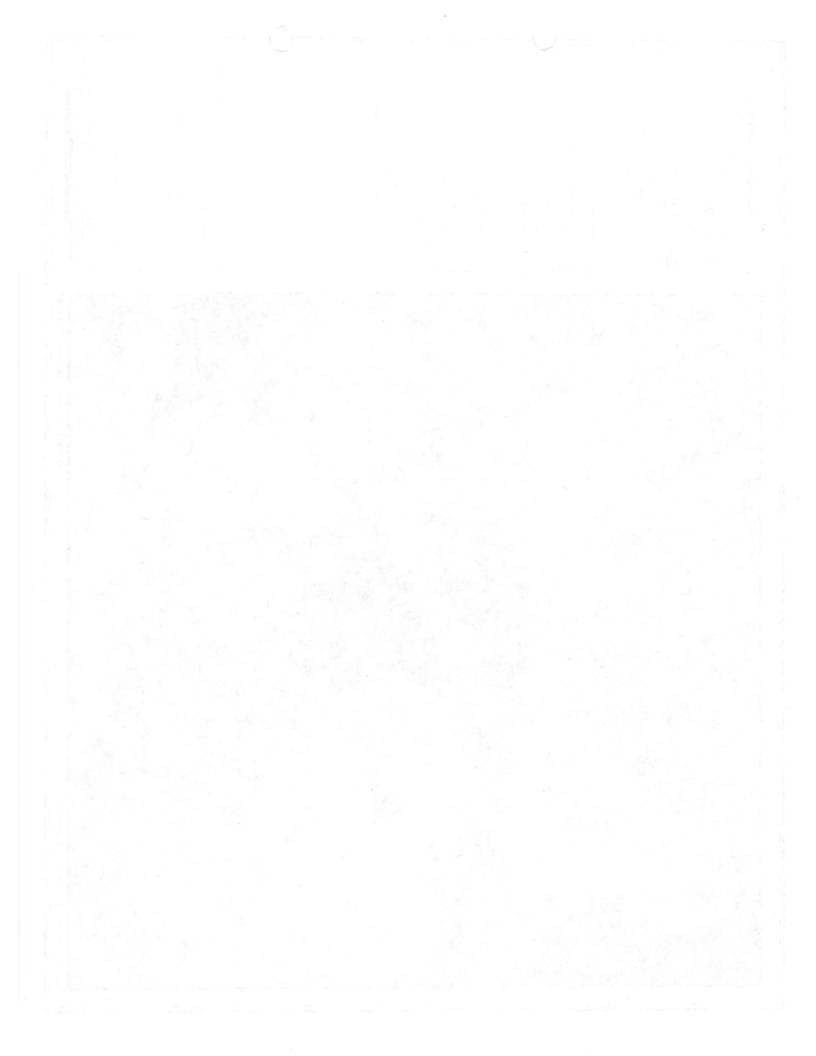
fr. Maglec

Fred Natolochny Supervisor of Resource Planning Grand River Conservation Authority FN/hi

• These comments are respectfully submitted to the Committee and reflect the resource concerns within the scope and mandate of the Grand River Conservation Authority.

cc: Gae Kruse, Township of Guelph/Eramosa Aldo Salis, County of Wellington Jackie Kay, RJ Burnside & Associates Limited (Guelph) Greg Sweetnam, 634745 Ontario Limited – Box 470, Bolton ON L7E 5T4 Mike Davies, Cuesta Planning Consultants (e-mail) Ministry of Natural Resources (Guelph District)





Hidden Quarry Comment Documentation

Agency	#	Comment	Response	Action Item	Who
	1	The drawings show that there possibly two entrance/exits off of the Sixth Line. 2 entrance permits would be required	Agree. The Southerly Entrance is the only entrance proposed for trucks. We would specify that only property maintenance use of northerly Entrance. North Entrance is existing.	Modify Site Plan-Truck Traffic only at south entrance Get entrance permits post approval.	Stovel
Public Works Guelph/Eramosa	2	Truck traffic on this road during ½ load season. The Public Works Department is concerned if the Sixth Line is structurally sound for truck traffic being a gravel road or should this road be rebuilt to Township Road Standards (minimum length of property) by the developer to permit the truck traffic?	Agree. Road from Highway 7 will be reconstructed to full load standard at JDCL expense subject to township approval.	Enter into road improvement agreement with Township	JDC Town
	3	The upward vertical slope of the road going northerly is quite severe and may pose problems for trucks going north from Hwy # 7 and also going south on Sixth Line approaching the stop sign at Hwy # 7.	Agree. Road from Highway 7 will be reconstructed as above and vertical alignments to be improved. Residents have also commented that there is an opportunity to improve current situation.	Provide draft vertical alignment profile to Township for comment.	Cole
	4	Details of private water and wastewater services required to service the scale house or Shop/Office/Lab building should be provide on the drawing showing location and size/footprint. CBO to confirm adequacy of services.	Agree.	PEng to provide conceptual Septic design	Keewatin
	5	A residential unit exists within the proposed site. Details regarding the intended use or removal of this residence and the associated services and entrance should be provided.	Agreed. The intention is to maintain the residential unit. The tennant will be employed as a site watchman. The residence will be maintained in a neat and tidy condition.	No Action Required	
	6	Details should be provided for the driveway apron and should adhere to Township Design Standards within the ROW. A high point at the property limit of the right of way should be provided in the	Agreed Agreed	A note will be added to the site plan to clarify this. Include in proposed road works in Comments 2 and 3 A note will be added to the site plan to clarify this.	Stovel Cole Stovel
	7	New Entrance/Exit to the site to ensure additional surface runoff is not being directed towards ath Line.		Include in proposed road works in Comments 2 and 3	Cole
	<u>8</u> 9	The proposed entrance to be paved from the scale house to the public road. Will the existing service entrance shown on the Operations Plan remain or be removed?	Agree. The existing service entrance located will be maintained as a field entrance for such activities as fence repair and monitoring.	Already noted. See note 13 page 2 of 5 of the Site Plan Entrances are shown on page 2 of 5 of the Site Plan. Note in Comment 1 to be added to clarify not a truck entrance	
Duranida Carranal	10	Fence/Gate geometry to be such that one full truck length can be off the travelled portion of the public road with the gate closed.	Agreed.	Show as detail or note on site plan.	Stovel
Burnside General Comments	11	Note 5 on the Operations Plan indicates that the existing property limits are fences although also indicates that fencing and repairs will be undertaken once extraction is initiated. An inspection of the existing fence condition is recommended to confirm the condition of existing fence and to establish the municipality's requirements in this regard.	Agreed	Inspection of existing fencelines will be conducted and existing condition of fences to be noted on site plan.	JDCL Stovel
	12	Top of rock elevation should be added to the Operations Plan.	Agreed	Bedrock elevations are currently shown on Page 3 of 5.	
	13	The Township's By-law Enforcement Officer should confirm the activities noted below conform to the Township's Noise Control by-law: extraction operations may occur between the hours of 7 a.m. and 7 p.m., Monday to Friday and 7 a.m. until1 p.m. on Saturday; hauling operations may occur between 6 a.m. and 6 p.m. Monday to Friday and 6 a,m, to 1 p.m. on Saturday; and, 6 a,m, to 1 p.m. on Saturday; and, drilling and blasting will occur between 8 a.m. and 5 p.m. Monday to Friday.	Agreed. Operations on site are restricted to after 7:00 am. Shipping hours are proposed to begin at 6:00 am. In the event shipping hours between 6:00 am and 7:00 am are found not comply, there are two remedies. 1. An exemption application can be made to council for permission to ship between 6 am and 7 am, this to be issued at council's discretion, or; 2. Shipping would be restricted to after 7:00 am. Shipping with commercal vehicles may be permitted under the by-law.	Contact Township By-Law Enforcement regarding the applicability of Noise By-Law to shipping with commercial vehicles.	JDCL
	14	It is understood that a small pond will be constructed for Wash water. Additional details should be provided on washing operations.	Agreed	Location of Wash water pond to be indicated on site plan	Stovel
	15	Additional details should be provided outlining how the stripped overburden will be dealt with.	Agreed	A note dealing with stripping and placement of overburden in screening berms and rehabilitation sites will be added to plans	Stovel Harden
Burnside Archaeological Comments	16	It is noted that a significant cultural heritage feature has been identified in the northwest portion of the site. The technical recommendations of the archaeologist (York North Archaeological Services) have been included on the site operational plan.	Agreed	No Action Required	
Comments	17	It is understood that a Stage III assessment will be undertaken prior to any works being completed on site. This assessment should be completed to the satisfaction of the Ministry of Tourism, Culture and Sport.	The Stage III Assessment only impacts areas depicted on the site plan. We have committed to doing this work, however, work may proceed on unaffected areas of the site prior to complation of Phase III Study. (Discussed Burnside Feb 1/13)	Complete Phase III on identified farmstead post approval.	YorkNorth
Air Quality Comments	18	The Emissions Summary and Dispersion Modelling (ESDM) as prepared by RWDI was reviewed. Although the documentation took some time to interpret, there was nothing in the ESDM to indicate that the site could not request and receive an Environmental Compliance Approval ("ECA").	Agreed	No Action Required	

		-		
	19	The Traffic Impact Study (TIS) for the proposed quarry was prepared by Cole Engineering Limited (2012) and generally considers traffic operations at the access onto the 6th Line as wellas the intersection of Highway 7/6th Line and Highway 7/Sth Line. Our comments in this regard are as follows:		
-	20	The TIS notes that 5th Line is under the jurisdiction of the Township of Guelph/Eramosa, however it is actually under the jurisdiction of the Town of Milton.	Agreed.We acknowledge that 5th Line should be labelled under the jurisdiction of the Town of Milton.	Cole Engineering to provide correction via addendum Cole
	21	Comments should be obtained from the Ministry of Transportation (MTO), for operations affecting Highway 7, and from the Town of Milton, for operations affecting 6th Line.	Agreed. We are awaiting comments from MTO at this time and will respond accordingly.	Respond to MTO commnets once recieved Cole
	22	No information is provided on the anticipated lifespan of the quarry, which would provide context into the potential for longer term impacts.	Agreed. Lifespan of Quarry is estimated to be 20 years.	No Action Required
	23	The forecast of background traffic is based on traffic counts taken in February 2012. The MTO clas.sifies Highway 7 as a commuter road, which is also confirmed by the strong directional distribution of traffic on a daily basis (i.e., high eastbound traffic in a.m. peak period and high westbound traffic in p.m.peak period). On a seasonal basis, MTO's commuter roads typically have 20 to 25% higher traffic volumes in the summer months, when compared to winter traffic (i.e., February counts). Traffic volumes should be increased to account for these seasonal variations.	Agreed. Cole has run an additional simulation (attached) which shows acceptable conditions at the peak seaonal level. The future (2022) total traffic is expected to operate with a volume to capacity ratio(v/c) of under 0.30. The shared southbound left-right turn lane at the Highway 7 / 6th Line intersection is expected to operate with levels of service of E and F (delay of 54 seconds) during the a.m. and p.m. peak periods, respectively; however, the volume to capacity remains well under 1.00, and as such, there is significant capacity remaining to complete this maneuver.	No Action Required
nside Traffic Impact Comments	24	The forecast of trip generation from the proposed quarry is based on data from a proxy site (i.e., Erin Pit). On a weekly basis, the calculation assumes consistent traffic over a Monday to Saturday period, inclusive. Information should be provided to confirm this assumption. The number of working days assumed for the critical month (i.e., August) also does not appear to take into account holiday period, or reduced operations due to weather, over the monthly period. Also the trip generation is based on average loads· which are typical of tractor trailers, whereas actual trip volumes may be higher if the fleet is comprised of higher numbers of tandem or triaxle trucks. Based on the above factors, the estimates for peak period traffic may be low.	Agree. Trip generation for the site was derived using information from the Erin Gravel pit and provides the number of vehicles per hour for the entire month of August (the peak month) and is provided in Appendix A for reference. The analysis in the April 2012 study assumed an average day during the peak month during both the a.m. and p.m. roadway peak periods. This would be typical of quarry operations. In addition to the trip calculations, the 33 tonne average load used to estimate the number of truck trips took into account tractor-trailers, tandem and tri-axle trucks expected to serve the site. During the busiest month of August 2011, there were 2,826 trucks that loaded at the quarry with the peak hour being 23 vehicles and represented 0.814% of the monthly traffic at the Erin Pit. Based on the 33 tonne per load figure and as documented in the April 2012 study, at the Eramosa Quarry, there will be a total of 21,213 trucks per year, of which there will be 2,989 trips during the peak month. Applying the 0.814% peak hourly factor results in a total of 24 trucks per hour or 1 truck every 2 minutes and 30 seconds. It should be noted that this assumption is based on a level of activity that will rarely take place and this calculation simply provides an upper limit of trips generated by the site. However, under this worst case scenario, trips added to the road network would still have minimal impact.	No Action Required
-	25	No analysis was provided on the requirements for turning lanes at the intersection of Highway 7/6th Line and at the intersection of Highway 7/6th Line. It is recommended that turning lane warrants and requirements be reviewed for these intersections.	Agree. Cole Engineering has provided an analysis (attached) showing that left hand turn lane is warrranted under the 2022 peak period condition. This condition is related to background traffic levels. The traffic generated by the quarry does not trigger the warrants. Eastbound Hwy. 7 to the 6th Line is a turning movement that will only rarely be performed by quarry traffic.	Review calculations with MTO once MTO comments received. Cole
	26	The TIS does not provide any review of the need to upgrade 6th Line to accommodate the increased truck traffic. It is recommended that a geotechnical study be provided to confirm the road base and road surface requirements. Road widths should also be reviewed, to confirm sufficiency to allow two lanes.	Agree. We met with the Township Engineering Consultant to confirm the timing of the preliminary design study and the Geotechnical study. We have directed a Preliminary Design Report and Geotechnical to proceed once the weather breaks, subject to township road superintendant granting occupancy permit.	Prepare Geotechnical study and Preliminary Design. Cole
	27	Analysis of stopping sight distances have been provided for the proposed access onto 6th Line, based on an assumed 50 km/h operating speed. However, since speeds are not posted, thelegal speeds on this rural road should be assumed to be 80 km/h, in accordance with the Highway Traffic Act. The required stopping sight distance should be revised accordingly.80 km/h, in accordance with the Highway Traffic Act. The required stopping sight distance should be revised accordingly.	Agree. We will propose that the posted speed limit be reduced to 50 km for the short section of the 6th line between the quarry entrance and Highway. Cole Engineering advises that road design improvements will increase sight lines to the appropriate design speed.	See Comment 26 above.
	28	The TIS does not analyze the available sight distances at the intersection of Highway 7/6tta Line. It should be confirmed that sufficient stopping sight distances and turning sight distances are available to accommodate the significant increase in truck turning movements at this location.	Agree. Cole Engineering has reviewed this and comments that Highway 7 is considered a straight road and we do not anticipate issues with sight distances. Photographs of the intersection confirm sight distances of over 500m in each direction.	No Action Item
	29	The visibility triangles (daylighting) are limited at the intersection of Highway 7/6th Line, by encroachment of existing trees. Considering the down gradient on the sth Line approach and the type of traffic (i.e., large trucks}, visibility triangles should be provided for the approaches, in accordance with the · requirements of the Geometric Design Manual for Ontario Highways.	Agree. Cole Enginnering adds that trees that limit visivbility can be removed as part of the road design.	See Comment 26 above.
	30	The design and placement of truck entrance warning signs should meet the requirements of the Ontario Traffic Manual, based on a design speed of 100 km/h on Highway 7 and 80 kmlh on 6th Line.	Agree, Cole Engineering's review (attached) of the OTM shows that truck entracnce warning signs should be placed 335 meters in advance of the intersection.	Include note on site plan that Truck Entrance Warning Signs be installed Stovel as per OTM.

	31	Development and site alteration are not permitted within a Provincially Significant Wetland ("PSW"). The boundary of the Eramosa River-Blue Springs Creek PSW should be staked in the field with the Ministry of Natural Resources ("MNR") or the Grand River Conservation Authority ("GBCA") with MNR's approvat. The report notes that the boundary wiU be staked at a later date but we strongly suggest that this exercise should occur prior to acceptance of the Level II report as it could have significant implications on the limit of extraction.		GWS to flag PSW boundary in spring and have GRCA confirm.	GWS
Burnside Natural	32	Development and site alteration are not permitted adjacent to a PSW unless it can be demonstrated that no negative effects will result. As such, additional information is required to confirm that the proposed quarry will not affect the hydrology of the wetland. Specifically, the Level II report notes that a hydraulic barrier will be required to prevent the loss of water from the wetland into the quarry bottom. However, there is no discussion of potential effects based on changes to the amount of water entering the wetland. Will the drainage area to the wetland be reduced as a result of the quarry?	Based on the topographic mapping provided in Figure 8 and our field observations, the 30 m buffer which is proposed adjacent to the PSW (MAS2-1) closely approximates the wetland's catchment area. Consequently, there should be no noticeable reduction in surface water input to this wetland. Groundwater will continue to flow into the wetland from the northwest at current rates. As a result, we do not anticipate any significant change in the amount of water entering the wetland.	No Action Required	
Environment Technical _ Report Comments	33	types of habitats have not been discussed or addressed: - According to Section 4.5.5 of the report, Little Brown	protection under the Endangered Species Act, 2007. We concur that discussions are required with MNR to identify the significant habitat for this species and the level of protection that is required.	Review endangered species habitat with MNR.	GWS

Burnside Hydrogeological Comments	34	"We raise some caution with respect to the water level information provided from standpipes installed in open pit excavations"	Agree. We concur that water levels obtained from test pit monitors are not ideal, however, where water levels are obtained, the pattern of seasonal variation appears to be reasonable in comparison to nearby monitoring wells installed with hydraulic seals. The test pit monitors without hydraulic seals include TP1, TP2, TP5 (removed), TP8 and TP9. Please find included a graph (Figure R1) of recent water levels obtained from TP1 and TP2 compared to nearby overburden drilled wells. The pattern and magnitude of change match very well suggesting that despite not having a seal, the standpipes provide a good representation of the water table.	No Action Required
Burnside Hydrogeological Comments	35	"TP9 has no description of the dolostone rock. Since the basal till layer has been removed, it is possible that the rock could be acting as an underdrain. Many intervals in the test pit logs do not include descriptions of soil colour and, as a result, it is not clear whether there was any evidence of colour changes associated with saturated conditions."	Agree. Please find below the requested detail. TP8 Depth- 3.8m Colour- 2.5Y5/4 Light olive brown TP8 Depth- 4.5m Colour 10YR6/2 light brownish grey TP8 Depth- 5.8m Colour 3.5 5/3 Light Olive Brown TP9 Depth-1m Colour 10YR6/3 Light olive brown TP9 Depth 4m Colour- 2.5 6/3 Light yellowish Brown TP9 Depth 4.6m Colour-2.5Y7/1 Light Grey (Rock) The basal till thickness was very thin at TP9, less than the length of the drive point (0.30 m). The excavation was made in February 2012, a time when infiltration should have been observed to perch on top of the till layer. I supervised the excavation and observed that there was no saturated soil above the till layer. The bedrock beneath the test pit was competent and did not break up as the teeth of the back hoe scraped along It is my opinion that if saturated conditions occur above the till in this area it is for a short duration.	No Action Required
Burnside Hydrogeological Comments	36	"Borehole logs for M5 to M10 were missing from the report."	Agree. There are no borehole records for these monitors. They are drive points installed from the ground surface.	No Action Required
Burnside Hydrogeological Comments	37	"It is noted that wells M1D to M4 do not include a surface seal and, as a result, the water levels reported may not be accurate."	Seals were installed above the screen in each of the monitors and although water may penetrate along the outside of the casing from the ground surface, the bentonite seals prevent movement to the screened portion of the well. At M1D, there is a consistent difference in hydraulic potential of approximately 1.5 metres between M1D and M1S. This suggests the hydraulic seal is working. AT M2, there is no saturated soil above the bedrock as confirmed at MW12. This monitor accurately reflects bedrock levels. At M3 there is a bentonite seal at the bedrock/overburden interface. Water levels verify that there is an unsaturated thickness of rock below the till. There is no indication from seasonal data that the absence of a full hydraulic seal is affecting static water levels. M4 has a seal to prevent water moving along the borehole annulus into the screened portion. There is no indication that seasonal infiltration events are affecting the water level in any of the bedrock wells.	No Action Required
Burnside Hydrogeological Comments	38	"Multi-level wells are located only on the west side of the site. The overburden geology changes from primarily sand at M3 to primarily silty sand till at M11. An understanding of the change in geology and variations in water levels between M3/M9 and M11 is needed so that the impacts of extraction on Tributary B can be fully understood."	No extraction will be occurring in the vicinity of M9, but at both M3 and M11 located at the edge of the proposed extraction, the entire thickness of overburden is unsaturated. Mini piezometers were installed beside Tributary B to determine whether or not there was any contribution of groundwater to Tributary B. As seen from MP3 and MP4, there is none along the northern property boundary. As seen from MP1 and 2, there is no groundwater contribution mid way through the site. Thus the proposed extraction cannot reduce water input to Tributary B ceases to flow from the site in late spring or early summer and thus every year when flow commences in early spring the hydraulic gradient between the dry bottom of Tributary B and the water table is at a maximum. As water exfiltrates from Tributary B, flow will take the path of least resistance and in the northern portion of the site, as evidenced at MP3 and MP4, the infiltration occurs nearly vertically. At MP1 and MP2 located midway through the site, there is evidence of lateral movement governed by sediments immediately below the streambed. As well, TP5 excavated within the water course has fine-grained material at the surface. However, at MW11 and M3 the overburden is unsaturated, indicating that this low permeability condition does not persist laterally from the stream. Not only will extraction remain a minimum of 20-30 metres away from Tributary B will be encountered. Other points for your consideration are; The hydraulic potential in the bedrock aquifer will rise in the southern halves of both the East and West Pond as a result of the hydraulic potential levelling effect of the open body of water. Therefore, there will be no greater hydraulic gradient between Tributary B and the potentiometric surface, post extraction. The Tributary has been altered significantly prior to JDCL ownership. Much of the Tributary is channelized to promote drainage. The flow in Tributary B is governed largely by the state of the berms at the edge of the De Grandi	No Action Required
Burnside Hydrogeological Comments	39	"Table C1 provides flow data. It is not clear from the table whether data with no values are due to no measurement being taken or whether flows were below the sensitivity of the flow meter. The data should be compared with precipitation data. This should be clarified. Continuous flow measurements would provide an additional level of understanding since spit flows are highly variable."	Blank cells indicate that no data was obtained. The intention of the streamflow data is to confirm the role that the site plays in terms of stream hydrology. It is clear Tributary B is a losing stream and that at no time does the streamflow at SW3 exceed that of SW4 indicating that even during spring freshet there is not a significant component of runoff from this site. A comparison of streamflow measured at SW4 to rainfall is provided in Figures R2 and R3. There is no recognizable correlation between monthly precipitation and the spot stream flow measurements. Although highly variable in magnitude, the relationship between streamflow upstream and downstream is consistently showing a loss of water through the site.	No Action Required

Burnside Hydrogeological Comments	40	"An in-situ hydraulic assessment was completed using falling head testing and using a pump to remove water at constant rate (M2, M4). Table D1 indicates that a falling head test was completed at M2 and a short term pumping test was completed in both M2 and M4. A comparison of hydraulic conductivity values obtained with the two methods at M2 should be provided."	Agreed. A copy of the t/t' data obtained for the pumping test at M2 is attached as Figure R4. The estimated transmissivity of the aquifer is 2.7 m2/day. M2 is essentially an open hole (filled with coarse sand) through the complete thickness of the dolostone aquifer approximately 42 metres. Using $k = T/b$ relationship, the estimated hydraulic conductivity is 7 x 10-7 m/s. This is not dissimilar to the slug test value of 1.8 x 10-6 m/s.	No Action Required
Burnside Hydrogeological Comments	41		Ageed. It is my opinion that the bentonite seal is preventing direct leakage through the borehole annulus into the screened portion of the well. It is possible in the fractured rock environment for vertical fractures to exist and thus allow for a connection to the borehole annulus above the seal through the aquifer around the hydraulic seal. This would provide a pathway from the test section to aquifer above the seal. If the borehole was the only vertical connection above the hydraulic seal, then the hydraulic conductivity measured in the test will be falsely higher than otherwise would occur. However, vertical fractures necessary to circumvent the hydraulic seal, if present, also have the potential to connect the test section to the aquifer above the seal and thus have the same effect as the unsealed borehole annulus.	No Action Required
Burnside Hydrogeological Comments	42	A good job was done in documenting wells near the site. The two nearby overburden wells are either no longer used (No. 6) or are used occasionally for cleaning purposes (No. 2). Well No. 2 is shallow (3.97 mbtoc) and should be monitored.	The adjacent land owner discharges water from his cooling system at the location of W2, thus monitoring this location will not provide useful information.	No Action Required
Burnside Hydrogeological Comments	43	Viewlog and Modflow were used to create a model of groundwater potentials for the bedrock aquifer	The model does not consider overburden at the site. Much of the site overburden is dry and where it is saturated, it is so because of relatively thin layers of lower permeable material. The overburden geology within the moraine is highly variable from layered silt, unweathered till, sand and gravel etc making accurate simulation of actual conditions very difficult. The model concentrates on more predictable geological conditions in the rock to address the potential impact on private wells which rely upon bedrock aquifer water and to estimate the area of influence of the quarry. The model is also used to estimate the potential gradients beneath the northwest wetland and this outcome is used in the water balance of the northwest wetland.	No Action Required
Burnside Hydrogeological Comments	44	 How does the model consider overburden at the site? Hydraulic conductivity values of 5.8 x 10-7 m/sec (M1D) and 4.0 x 10-7 m/sec (M13D). How were these lower k values utilized in the model? 	The final hydraulic conductivities used in the model were based on comparing model results with regional data . This included the pattern of northwest to southwest groundwater flow across the site. Ultimately, a hydraulic conductivity more than an order of magnitude greater than estimated at M1D and M13D was used. Lower hydraulic conductivity values in the bedrock also could simulate the heads, however, an unrealistically low recharge value would then be needed to mimic actual observed conditions. Thus, through the model calibration process, a value of hydraulic conductivity of greater value than observed at M1D and M13D was arrived at.	No Action Required
Burnside Hydrogeological Comments	45	- Appendix D does not contain any hydraulic conductivity data for M3 and the highest k value is 2.0 x 10-4 m/sec at MpN-1. What is the rationale for assigning a value of 1.8x10-4 m/sec to the bedrock and what is the thickness of this layer?	The rationale for this was that there is a bend in the regional groundwater flow pattern based on measured hydraulic heads from on-site wells and private wells (Figure R5). The only way to simulate this bending is to include a zone of higher hydraulic conductivity as shown. Brydson Spring occurs at the southern end of this zone and is a significant point discharge, confirming that enhanced permeability likely exists. This zone also accounts for the relatively low hydraulic potential observed at M3. In this same area, Tributary B and Tributary C both infiltrate indicating the ability of the bedrock unit to accept water as there is no discharge of water from the overburden in areas of lower elevation north or south of Hwy. 7 on the Brydson Farm.	No Action Required
Burnside Hydrogeological Comments	46		We included an area of slightly higher recharge where till was absent and closed depressions tend to enhance recharge. A value of 150 mm/year may be low given the estimated surplus water value of greater than 300 mm/year. The model is able to simulate the hydraulic head and pattern of groundwater flow to a reasonable degree. Altering small sections of the model to include depression focused recharge in small areas is unlikely to have a significant effect on this outcome. The purpose of the model is to provide an estimate of the gradients beneath the Northwest wetland and estimate the area of influence of the quarry such that potential impacts to natural heritage features and wells within that area of influence can be considered. It is my opinion that the model provides a reasonable estimate of gradients beneath the northwest wetland and area of influence.	No Action Required
Burnside Hydrogeological Comments	47		The direct recharge to the bedrock aquifer in the Harden Model will be somewhat lower than recharge on other models such as the Gartner Lee Model and the Aqua Resource Model in that the Harden Model does not model the overburden layer and thus does not have any active drains in the overburden as other models will have. We have observed and measured significant volumes of groundwater flow in Tributaries A, B and C that emerge from the overburden along the southern edge of the Paris Moraine. This groundwater will have originated as infiltration, encountered a layer of lower permeability and emerged along the flank of the moraine from overburden sediments. A portion of this water re-emerges between the original spring source and Blue Springs Creek and where this occurs near to the site, we have increased recharge along the Tributary corridor commiserate with the measured loss of streamflow.	No Action Required
Burnside Hydrogeological Comments	48		The calibration of hydraulic potentials is provided in our report on Figure H8, confirming a good correlation to observed water levels. The static water levels available from the water well data base were kriged and the result is shown on the attached Figure R6 for an area near to the site and on Figure R7 in a regional perspective. A similar pattern of groundwater flow occurs in the model simulation.	No Action Required

		- The model is used to predict changes in bedrock water levels as a result of extraction in two areas of the site. What will the impacts be in the overburden?	only. This allows for a prediction of the potential impact to nearby water supplies, all reliant upon the bedrock	No Action Required	
Burnside Hydrogeological Comments	49		 aquifer. The Paris Moraine upgradient of the site is an area of regional groundwater recharge. A lower water level in the bedrock aquifer may depress the water table in the overburden as well, depending on the permeability of sediments overlying the bedrock. The significant heritage features that are related to water levels in the overburden are the Northwest wetland, the Rockwood Farm spring and the De Grandis Spring. The potential impact to the Northwest Wetland is addressed in a detailed water balance and mitigation is provided by way of an hydraulic barrier. The groundwater model predicts changes to bedrock water levels beneath the perennial Rockwood Farm spring and the ephemeral De Grandis Farm spring. Our reason for suggesting that there will not be a significant change in spring discharge is that the evidence available suggests that the spring discharge originates from permeable moraine sediments and not the bedrock. The overburden features are isolated from the bedrock water by the presence of a persistent low permeability silt layer The evidence includes; Observations of groundwater seepage at the toe of slope on the Degrandis farm in an area of surficial silt till deposits. Observation of significant elevation rise in the source area of the Rockwood Farm spring attributed to increased thickness of overburden Observation of permeable surficial sediment conditions north of the De Grandis farm. Loss of streamflow in the Allen Wetland Presence of silt beneath Allen Wetland Relatively low hydraulic head measured in the Allen Farm house well proximal to the spring Permeable conditions measured in the De Grandis dug well Anecdotal descriptions of clay encountered during excavation of DeGrandis Pond. 		
Burnside Hydrogeological Comments	50	- Many of the figure do not have legends and as a result the significance of the colours used is not always apparent.		Include modified figures into report via addendum.	Harden
Burnside Hydrogeological Comments	51	 Tributary B is an ephemeral stream which was assigned a recharge value of 0.154 m/day. How was this value calculated? How was limited flow data for SW5/SW7 considered in the calculation? 	The loss of water in Tributary B has been documented and varies between zero and 24 L/s over the site. The recharge was modelled at a constant rate of 5 L/s for Tributary B. Essentially all of the flow in Tributaries A and C infiltrates and losses of 8.5 L/s for Tributary C and 10 L/s for Tributary A were assigned to these streams. Thus, the annual recharge to the aquifer was calculated and distributed equally over the year along the model area representing the losing portions of the streams. The more complete data set from SW4 and SW3 were used for this calculation.	No Action Required	
Burnside Hydrogeological Comments	52	- Burnside recommends that a thorough review of the model be completed by a groundwater modeller with experience in fractured rock geology.	There is limited potential for water level change in the bedrock let alone the overburden arising from the proposed mining activities. A maximum change of three metres can occur in the bedrock as there will be no dewatering of the site. The model uses an equivalent porous media model and not a fractured rock model in order to predict changes in the hydraulic potential of the bedrock aquifer. Complexities of a fractured aquifer are not considered in the model, and are not relevant to our analysis. To this end we have recommended a detailed water well survey prior to below water table extraction and ongoing monitoring in the nearby PSW's. Streamflow at RS1 will continue and if necessary a staff gauge in the De Grandis ponds will be added. Rather than undergoing a rigorous fractured rock modelling exercise, we have used a porous media model to project estimated changes in water levels. Ultimately, trends observed in monitoring data will be analysed and if it appears that an impact could occur to any natural heritage feature, mitigation of impacts including possible cessation of extraction could occur.	No Action Required	
Burnside Hydrogeological Comments	53	reasonable given the till layer overlying the bedrock. However, it is not clear if higher recharge rates in micro drainage area D7 would affect the interpretation of future impacts. Based on the 1m contours in Figure 3.4 it is also not clear why D5 and D6 are not considered as one micro-drainage area.	closed depression. Higher recharge rates could be used for micro drainage area D7. However, in the scale of the model, it will not affect the outcome.	No Action Required	
Burnside Hydrogeological Comments	54	The bedrock surface is shown in Figure 3.5. The proposed extraction area should be added to this map. It appears that there are few (if any) bedrock monitoring wells within the two extraction areas. Given the heterogeneity of the bedrock, it is recommended that monitoring wells be installed within the extraction areas.	The extraction area has been added to Figure 3.5 and attached. We do not recommend additional bedrock monitoring wells in the extraction area as the pattern of hydraulic potentials is reasonably straightforward.	No Action Required pending further discussion with Burnside	Harden
Burnside Hydrogeological Comments		The report indicates that in general the basal silt till is thin or absent above the bedrock near Tributary B. It is our opinion that there is insufficient information to conclude that the basal till is thin or absent near Tributary B. TP3, TP5 and TP11 did not encounter bedrock but did have finer grained materials. There is no discussion about the difference in effective "K" values between the till and the finer grained materials. This suggest that the water "lost" by Tributary B may be remaining in the overburden and may not reach the bedrock.	Monitoring Well MW11 is dry and is located 20 metres from Tributary B. Mini piezometers MP3 and MP4 are installed adjacent to Tributary B and have always been dry. Mini piezometers MP1 and MP2 have water in them and always indicate a losing stream. There are no fish in Tributary B and the flow of water in Tributary B is derived mainly from off-site sources. Tributary B has been channelized and originally did not flow from the site except under extreme flood conditions. Extraction will not occur within 20-30 metres of Tributary B and water loss by Tributary B is governed by the soils immediately below and adjacent to the Tributary. The only potential for loss will occur during the months that there is water in the tributary with the effect of causing the Tributary to cease flowing somewhat earlier than presently occurs. There is already a significant annual range in the period of time that Tributary B is dry.	No Action Required pending further discussion with Burnside	
Comments	56	It is noted in the report that the Brydon Spring likely represents discharge directly from the bedrock and can be considered to be the re-emergence of Tributaries B and C. There are limited bedrock wells on the proposed quarry site and there is no data that confirms that the tributary loses water to the bedrock. Tracer testing should be considered to confirm this statement.	The Brydson Spring emerges some 400 metres from the proposed quarry and downstream from areas of measured losses of streamflow in Tributaries B and C. All of the lands farther downgradient of the Brydson Spring have numerous exposures of bedrock. There are no springs emerging from the side slopes along Hwy 7 nor are there springs in the Tributary B watercourse other than Brydson Spring. The water level in the bedrock well at the residence beside Tributary B is below the bedrock overburden contact as is observed at M4. The water level in the private residence across from M7 is also below the overburden/bedrock contact observed at M4. M7 was installed to an elevation just above the bedrock/overburden contact observed at M4 and a water table has never been measured at that location. Thus, it is reasonable to assume that recharge occurring in Tributaries B and C contribute to the bedrock aquifer. There is no reason to verify this opinion with a tracer test as water levels at the Brydson Spring will increase if anything as a result of the quarry.	No Action Required pending further discussion with Burnside	

Burnside Hydrogeological Comments	57	It is indicated that some monitors have up to 17 years of records and provides groundwater potentials for overburden and bedrock in Figures 3.16 and 3.17There also appears to be limited data to support the contours between MW1 and M7. Similarly there does not appear to be sufficient data presented in the report to support the assertion that "groundwater occurring within the overburden does so above the silt till as a silt layer generally in the northern portion of the site and percolates into the bedrock within the southern portion of the site. An isopach map of silt thickness would assist in demonstrating the limit of the till unit.	We have attached a map of basal silt/till thicknesses derived from the same data as presented in the boreh and test pits logs. From this we conclude that a silt/ till layer generally occurs throughout the site, althoug absent at M2, M11 and M12. The hydraulic potential of water levels in the bedrock aquifer are greater that the elevation of the overburden/bedrock contact only at stations M13D, M14D and M1D. At all other statis the potentiometric surface in the bedrock aquifer falls below the overburden/bedrock contact. M7 was installed to address the potential for water perched above a till layer near to M4. The bottom of monitor M has an elevation of 349.42 m AMSL and the till observed at M4 has an upper elevation of 350.46 m AMSL. Thus, proximal to M4 along the southern property boundary, there is no indication of a saturated conditio above the bedrock. Also, monitors M11 and M12 installed to the top of the bedrock have never had wate them indicating that conditions allowing water to percolate into the bedrock exist at the site. The top of ro W1 is 347 m AMSL. Test pit TP7 was excavated to a depth of 348.2 m AMSL with dry sand and gravel overl a silty sand. Again, this provides limited opportunity for a saturated condition to occur above the bedrock.
Burnside Hydrogeological Comments	58	An estimate of hydraulic conductivity and transmissivity based on data collected during short term pumping tests and falling head tests is provided. Based on the mapping provided, it appears that none of the bedrock wells tested are within the two proposed extraction areas. Onsite in-situ testing was completed in wells with limited screened intervals. The lack of data within the extraction areas results in several concerns:	There is potential for areas of higher and lower hydraulic conductivity at this site as occurs throughout the dolostone bedrock aquifer in this area. The mandate of our study was to determine what the potential im of developing an open water body at this site has on nearby water wells and Provincially Significant Wetlar The maximum water level drawdown that can occur along the northern edge of the site is estimated to be three metres. This is based on a six metre overall difference in potentiometric elevation across the propor extraction area. The potential impact to the nearest water well is estimated to be 1.6 metres. Given that to neighbour is withdrawing 400 litres per minute and drawing down his well by some 40 metres, a change of metres will not have an effect on the nearest well's ability to obtain water from the bedrock. The groundw model uses a hydraulic conductivity at the higher end of the spectrum resulting in a greater area of predict impact than would occur with a lower hydraulic conductivity (see Freeze and Cherry, Figure 8.6). The maximum drawdown in a hydrostratigraphic unit will be approximately three metres at the edge of the qu There will not be a significant impact on any private water well.
		- Given the heterogeneity of the bedrock, is there the potential for zones of higher or lower k to be present. There are significant variations in flow (400 I/min at mushroom farm vs. 82 I/min at TW2	
Burnside Hydrogeological Comments	59	 The excavation will behave as a large diameter well open through the bedrock sequence. The onsite wells are screened over discrete intervals and hydraulic testing will not be representative of the entire bedrock sequence. 	The on-site testing suggests a range in hydraulic conductivity in the bedrock of almost two orders of magn and in general represents hydraulic conductivities that occur near to the bedrock/overburden contact. Th two wells that extend the full depth of the quarry (W1 and TW-2) as discussed in Section 3.6.2.1 of the rep do not suggest a zone of significant hydraulic conductivity. The fact that the 60 m deep neighbour's well ca only run intermittently at a rate of 400 litres per minute (88 imperial gallons per minute) indicates that a zo of high hydraulic conductivity is not present. The maximum drawdown from the extraction is in the order three metres at the edge of the quarry and will be less at the nearest wetland and water well. The water le in the wetlands are seasonally perched above and isolated from the bedrock water level by underlying silty soils.
Burnside Hydrogeological Comments	60	The Guelph/Eramosa Study used significantly higher hydraulic conductivity values. Since the bedrock is heterogeneous significant variations in hydraulic conductivity can be expected. Additional data from within the extraction areas is needed to confirm on-site conditions.	The Guelph Eramosa Study used the following values: Upper Amabel 1 x 10-5 m/s Production Zone 5 x 10-4 Lower Amabel 1 x 10-5 m/s This was based on model calibration and pumping tests indicating transmissivity of 1368 m2/day. This high level of transmissivity is not observed in on-site wells tested (M2, W1) nor TW-2 in adjacent lot. As dewate will not be occurring at this site, the presence/absence of heterogeneity in the bedrock aquifer is immateri
Burnside Hydrogeological Comments	61	Add stratigraphy to Figure 3.18	All monitors in this figure are drive points and as such, no stratigraphy is available. The geological informati from nearby TP5 suggests that the soils in this area are a silty sand. No significant permeability contrast occurred in TP5 until a depth of 348.68 m AMSL where a gravel layer was encountered. The Figure 3.18 in report shows graphically that there is a constant loss of water from Tributary B during both high and low w conditions.
Burnside Hydrogeological Comments	62	It is agreed that there does not appear to be any groundwater contribution to the Northwest wetland from the bedrock. The water level data in Fig. 3.19 and information in cross section B-B suggest that upward gradients in the overburden west of the wetland may provide discharge to the wetland in the spring when water levels are highest.	We concur that there is the potential for overburden groundwater to contribute water to the wetland duri spring conditions. It is our opinion that this will not change. Although the potential exists, the actual movement of water into the wetland may not be occurring. I have attached Figure R9 with newly obtaine water levels from the wetland and nearby monitors in 2012. The figure confirms that during the drought conditions, the water in the wetland was perched above the overburden groundwater in all directions. Th retention of water in the wetland must be facilitated by the presence of a lower permeability layer along the base of the wetland. This shows the independence of the wetland from the shallow overburden system. T even if minor changes in the shallow overburden system arise, an impact to the wetland will not necessaril occur.

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63	The same condition occurs at nearby on-site wells MW13D, MW14D and M1-D which have good geological profiles. The shallow wells adjacent to these deep wells confirm that a layer of lower permeability till or silt separate the bedrock from the overburden, allowing for saturated conditions to occur in the overburden. It is our interpretation that similar conditions occur at 6707545. The Rockwood Farm spring is located significantly closer to Well 6707545 than the De Grandis spring. Harden measured the water level at the Rockwood Farm well to be 354.80 m AMSL (slightly above the bedrock surface) and the elevation of the spring emergence is at approximately 361 m AMSL. This is more than a six meter difference in hydraulic potential over a relatively short lateral distance. Northward of the spring the ground elevation increases by almost twenty metres and the indication from nearby water well records is that this increase not reflected in the bedrock surface, thus the overburden thickness increases significantly north of the spring. Springs occur at the base of this topographical feature on both the De Grandis and Rockwood farm properties. It remains our opinion that the Rockwood Farm and De Grandis on obtaining a permit to dig her pond deeper as the water levels were abnormally low. According to Ms. De Grandis, over the years sediment buildup in the pond has decreased spring discharge into the pond. The GRCA investigated the site and upon presenting an application will grant a deepening of the De Grandis Fond. Ms. De Grandis was present during the excavation of the pond was dug into "clay" and only along the northern edge was a significant spring encountered. We asked if bedrock was encountered and she did not observe rock at the bottom of the ponds. There are very stony fields northerly of the De Grandis farmstead providing ample opportunity for recharge and southerly movement of water in the overburden the ponds.	No Action Required
64 if there was a conduit created through the till when the wells were constructed. The current level of information does not allow the following concerns to be addressed:	at a superior elevation than the farms and overland flow to M2 will not occur. The only reasonable source of nitrate is the adjacent farm. M3 is also located in a surface water catchment that derives surface water from	No Action Required
 If the elevated nitrate is currently present in only the shallow bedrock, excavation of the bedrock will create a vertical connection between the shallow and deep fracture systems. What will be the impact to nearby domestic well quality? 		No Action Required
- The final depth of extraction is not indicated. What are the impacts of mixing water from the underlying shale with the water from the dolostone?	The proposed quarry will be a minimum elevation of 320 m AMSL and shale was encountered in M2 at an elevation of 308.8 m AMSL, thus the bottom of the quarry will be at least 10 metres from the underlying shale unit. There will be no mixing of water from the shale unit arising from the proposed quarry activities.	No Action Required
6/		No Action Required
The construction of a hydraulic barrier along the downgradient side of the onsite wetland is proposed. - It is not clear from Fig. 4.2 how the location of the proposed barrier corresponds to the limits of micro drainage areas on	The hydraulic barrier is a buried feature and in itself will not affect surface water flow.	No Action Required
The addition of wells and water level data to Figure 5.1 along with observed lithology is needed to ensure that the barrier is placed at the optimal location 69	Figure 5.1 is a schematic diagram of the various hydrologic components considered in the development of the water balance of the wetland and is not intended to represent on-the-ground conditions. Lithology has been observed at MW1-S, MW13S, MW14S and TP2 and suggest similar geological conditions of sandy sediments overlying a silt or till. Construction of the barrier will be supervised to key the barrier into the top of the silt/till unit. It is proposed that the barrier be installed as shown on Figure 4.2 of the Hydrogeology report. The location of the barrier was discussed with the biologist and was located as near to the wetland as possible to maximize barrier effectiveness without physically altering conditions within the wetland.	No Action Required
70 Additional detail on how the width of the barrier was calculated should be provided.	restricted along the southern edge of the wetland. Based on discussions with an excavation contractor, a	No Action Required
 The statement that the creation of a waterbody will result in increased storage and will benefit downstream wells, springs, ponds or streams during drier conditions suggests that there is a connection between the bedrock beneath the site and downstream resources. As a result, any decrease in available water onsite or changes in water quality will potentially impact downgradient features. 	The quarry will create a vertical connection within the bedrock aquifer just as every bedrock well presently does. The water quality tested at W1 which penetrates the entire thickness of the proposed quarry suggests that vertically integrated water quality is good. The same good quality water was obtained from nearby wells TW-1 and TW-2 which also penetrated the entire thickness of the proposed quarry to be extracted. Significant changes in water quality and quantity are not expected to occur at this site and JDCL has committed to conducting a pre-quarry survey of water quantity and quality of neighbouring wells to obtain baseline conditions.	Conduct Water Well Survey post approval. Harden
	do not appear to be any bedrock wells in the vicinity of the De Grandis Property. If similar conditions exist on the De Grandis property, is there the potential that the maximum predicted drawdown of 0.6 m shown in Figure 4.3 could impact the Pond? 63 Elevated nitrate concentrations (> 5 mg/l) were present in samples from bedrock wells M2 and M3. Both M2 and M3 are the top of screen at M2 is about 7 m bedrock wells were and M2 is about 7 m bedrock wells were and M2 is about 7 m bedrock wells were constructed. The current level of information does not allow the following concerns to be addressed: 64 Elevated nitrate concentrations (> 5 mg/l) were present in samples from bedrock wells M2 and M3. Both M2 and M3 are bedrock/ull contact and the top of screen at M2 is about 7 m bedrow the wells were constructed. The current level of information does not allow the following concerns to be addressed: 64 Finder was a conduit create through the till when the wells were constructed. The current level of information does not allow the following concerns to be addressed: 7 What is the source of the nitrate? 8 Finder weak is the source of the nitrate? 9 The indicated is currently present in only the shallow bedrock, excavation of the bedrock well quality? 65 - The indicated of the nitrate? 7 The indicated of extraction is not indicated. What are the impacts of mixing water from the underlying shale with the water from the dolostone? 66 - The final depth of extraction is not indicated. What are the impacts of mixing water from the un	63 instrumentation of the source

[There is not sufficient information on the bedrock in the extraction areas to allow for a reliable prediction of drawdown to be	There will be no active dewatering at this site and the potential impact of 'lake leveling effect' and aggregate	No Action Required Pending Discussion with Burnside	Harden
		made. The vertical spacing and contribution of the water bearing fractures is not known and as a result, inflow into the pit may	removal from the site have been addressed in our report. There will be a dewatering of fractures near to the		
		result in temporary dewatering of shallow fractures. The length of time for water levels to stabilize is not estimated. There is also a potential that bedrock water quality will be affected if cascading occurs within the extraction area.	north quarry face and a depressurization of fractures within the area of influence of the quarry. The opposite will occur on the south face where water levels are expected to increase. This will be a small but permanent		
		also a potential that bearook water quality will be affected in cascading occurs within the extraction area.	change in the groundwater system. The change will occur over several years, increasing as the quarry expands		
	72		southward. There will be ample opportunity to observe and record water level changes in the bedrock aquifer,		
			northwest wetland and private wells. Once quarrying has ceased, the final lake level equilibrium will be		
			established within months. Extending the required monitoring for a period of one year will allow for		
			verification of water level changes.		
-		The report indicates that there is downgradient of the Northwest Wetland groundwater flow in the silty sand layer and sand	See Till Isopach Map response. It is our opinion that any water occurring above the till/silt layer near the	No Action Required	
		and gravel layer ceases and there is only groundwater found in the bedrock. There are no overburden monitoring wells	southern portion of the site, does so intermittently. There are no natural heritage features or water wells		
	73	downgradient of M1S/D and as a result, there is no evidence to confirm that there is no water in the overburden.	reliant upon a perched water table.		
l t		Northwest Wetland water balance should address the following:	On a year over year basis, our observation over almost two decades is that there is little water remaining in the	No Action Required	
			wetland by September/October. Thus, a water balance prepared for the wetland should not show a year over		
Burnside Hydrogeological			year increase or decrease of water. Starting with observed hydraulic gradients, measured water levels and		
Comments			hydraulic conductivities obtained from wetland monitors, a water balance representing the aforementioned		
			observation was prepared. The groundwater flux for the saturated sand and gravel upgradient of the wetland		
	74		is somewhat different than down gradient of the wetland due to differences in hydraulic conductivity.		
			Upgradient of the wetland, the hydraulic conductivity is estimated to be 5 x 10-5 m/s and downgradient it is		
			estimated to be 3 x 10-5 m/s. These small differences are the main reason for groundwater flux differences in		
			the water balance.		
-	75	- There is a difference between the flux of groundwater upgradient and downgradient of the wetland			
-	, ,	 Is the increase unsaturated thickness due to variations in the elevations of the top of the till or is it a result of contribution 	There is some variation in the elevation of the top of the till near to the wetland. The top of till elevation north	No Action Required	
		by the wetland?	of the wetland is 352.18 m AMSL at M13, 351.59 m AMSL at M14 and 351.64 m AMSL at M1. Thus the top of		
			the till layer is approximately 0.5 metres higher north of the wetland resulting in lesser saturated thickness of		
	76		sand and gravel to the north and greater thickness of saturated sand and gravel to the south of the wetland.		
			The ground elevation south of the wetland rises and the elevation of the water table falls, thus there is an		
			increase in the unsaturated thickness south of the wetland.		
	77	- The design k of the barrier 1x10-7 m/s is Section 5.1.1.2 which is different than the value of 5 x 10-8 m/s in section 4.2.1.	The design hydraulic conductivity is 1 x 10-7 m/s. The statement in Section 4.2.1 is incorrect.	Correct Section 4.2.1 via Addendum	Harden
		The predicted water level change in the aquifer for the nearest well will be 1.6 m. However, there are no wells within the	There will be no dewatering at this site and thus the potential change in water level at the quarry will not be	No Action Required	
		proposed extraction areas that penetrate to the proposed depth of the quarry. As a result, the potentials for a connection with	significant. The estimated water level change at the nearest water well is based on the model using a hydraulic		
	78	nearby domestic wells is not known.	conductivity of 1 x 10-5 m/s. Groundwater monitors M13D and M14D are located between the extraction area		
			and the nearest neighbour. These monitors will be used to verify changes in the hydraulic potential.		
-		The extraction of the bedrock has the potential to connect shallow fractures with deeper fractures and as a result, there is the	Every water well constructed in the bedrock presently connects shallow aquifer water with deep aquifer water.	No Action Required	
	79	potential to cause changes in water quality in nearby domestic wells. Please comment.	The water sample obtained from the on-site well (W1) shows that the water quality, integrated over the		
			proposed depth of the quarry, is good.		
		There are no wells that provide an indication of water levels in the bedrock within the extraction areas. The monitoring	There are six groundwater monitors on the site that provide water levels in the bedrock aquifer. The	Establish Trigger Levels for specific monitors	Harden
			potentiometric surface behaves in a predictable manner (northwest to southeast flow). Overburden water		
		provide a better understanding of where the significant water bearing fractures occur in the bedrock. We concur with the need			
		to compete a well survey. Contingency measures should be tied into trigger levels for both water levels and water quality.	overburden. The potentiometric surface of the bedrock is also above the overburden/bedrock contact in those		
	80		wells where there is water in the overburden. This is not the case for M4 or W1 and the fact that M7 is always		
			dry and no water was observed at TP7 indicates that there is unlikely to be water above the bedrock in those		
			areas. M4 is located immediately downgradient of the proposed extraction area and will be used as a long term monitor. Trigger levels with respect to water levels and water quality will be established.		
	01	Wells in test pits not accurate	See response to Comment 34.	No Action Required	
-	81	Additional water levels in overburden south of wetland	There are no natural heritage features or wells associated with overburden water south of the wetland and	No Action Required	
	0.2		there is no indication from existing monitoring network, testpit program, geological sampling that a significant		
	82		amount of water exists in the overburden. See section on Till isopach.		
		Significant Water Bearing Features in Bedrock	We understand that the Gasport Aquifer can have have significant permeability differences and thus there may	No Action Required	
-			be differences in the response in the bedrock aquifer to the 'lake-levelling' effect on the hydraulic potential in		
			be differences in the response in the bedrock addien to the lake-leveling effect on the hydraulic potential in		
-			the aquifer. The maximum change in hydraulic potential is approximately three metres at the quarry edge and		
	83		the aquifer. The maximum change in hydraulic potential is approximately three metres at the quarry edge and		
	83		the aquifer. The maximum change in hydraulic potential is approximately three metres at the quarry edge and even if there are significant water bearing fractures, the maximum impact will not be greater than three metres		
	83		the aquifer. The maximum change in hydraulic potential is approximately three metres at the quarry edge and even if there are significant water bearing fractures, the maximum impact will not be greater than three metres at the quarry edge. We understand that if this were a pumping well or a dewatered quarry that there could be		

GRCA Comments	84	1. As of January 2011, the GRCA is requesting that all below-water sand and gravel operations in priority subwatersheds conduct a cumulative effects assessment in accordance with Cumulative Effects Assessment (Water Quality and Quantity) Best Practices Paper for Below-Water Sand and Gravel Extraction Operations in Priority Subwatersheds in the Grand River Watershed- September 2010. This document was jointly authored by the Ministry of Natural Resources, the Ontario Stone, Sand, and Gravel Association, the Ministry of the Environment, and the GRCA. While the assessment was not specifically intended to address quarry operations, it is in a priority subwatershed (the Eramosa River subwatershed). As such, we request that the Best Practices document be applied as part of this application.		Provide Best Practices as new Appendix to Report	Harden
GRCA Comments	85	2. We note that no mention is made of the floodplain mapped on this property in the Hydrogeological Investigation. Mapping available from ORCA's WebGIS outlines a 40m wide estimated floodplain along the Blue Springs Creek tributary (Tributary B) that passes through the property (20m on each side). Estimated floodplains were identified for rural areas having drainage areas of about 100 hectares or more, which, based on water course delineation provided on MNR mapping at the time of estimation (1995-2000) was the case for the subject property. Since this tributary combines with another at Highway 7, just downstream of the property, there is a need to confirm the elevation of a backwater floodplain from that point and to demonstrate that the proposed excavation boundaries remain outside of the creek buffers. Please map this and confirm that excavation boundaries and proposed buffers are beyond this elevation. If this results in conflict, the boundaries can be moved accordingly or alternatively a hydrologic analysis may be carried out to generate a regulatory event runoff rate and volume. This can be compared to available storage stages and vol umes within the landscape above Highway 7 in order to evaluate a possibly lower backwater elevation. The main concern here is that a severe storm of Hurricane Hazel's magnitude should not result in the tributary creating a new path into excavated areas that are proposed at much lower elevations than the nearby creek bed.	The elevation of Tributary B where it crosses beneath Hwy 7 is approximately 351 m AMSL. The elevation of Tributary B where it leaves the Hidden Quarry site is approximately 357 m AMSL similar to the elevation of Hwy 7. On the Hidden Quarry site, the top-of-bank elevation along Tributary B ranges from 359 to 360 m AMSL. Thus, in the extreme event, water will flow over Highway No. 7 prior to overtopping natural banks on the Hidden Quarry site.	No Action Required	Harden
GRCA Comments	86	3. In the Natural Environment Technical Report, the limit of the creek and its associated floodplain that was identified in the report needs to be determined. A fluvial geomorphologic assessment is typically required by the GRCA to establish the meander belt width and setback requirements. This study should also provide recommendations to minimize the impact associated with the proposed stream crossing.	We believe that this feature can be discussed during the site visit with GRCA.	Meet with GRCA in Field to discuss requirement for Fluvio Assessment.	Harden
GRCA Comments	87	4. According to the groundwater model in the Natural Environment Technical Report (see page 7), "the maximum magnitude of water level change in the bedrock aquifer is a decline of 1.8 metres at the northern Site boundary and a rise of 1.5 metres at the southern Site boundary. The magnitude of groundwater drawdown at the northwest wetland ranges from 1.1 to 1.9 metres for the maximum extraction scenario. The average drawdown value of 1.53 metres should be used to estimate the increase in groundwater flux beneath the wetland and area up-gradient of the proposed hydraulic barrier." This potentially represents a significant hydrologic impact that has not been fully assessed in the report and further details can be included in the updated EIS.	recommended that a hydraulic barrier be installed downgradient of the wetland. The barrier will decrease the	No Action Required	
GRCA Comments	88	5. According to the groundwater model in the Natural Environment Technical Report (see page 7), "extraction of the north half of the west pond will result in a maximum predicted change of 0.7 metres at the northern property line, a maximum change of 0.35 metres below the northwest wetland and less than five centimeter change beneath the Rockwood Farm or Degrandis springs. The commencement of extraction in the north half of the west pond will allow for several years of monitoring to verify predicted impacts prior to extracting the south half of the west pond ." We agree that monitoring is necessary and further suggest the need for groundwater triggers and contingencies to prevent significant adverse impacts before they occur. The impacts of the groundwater levels below the wetlands need to be assessed and the EIS updated accordingly.	The potential impact to groundwater levels beneath the wetland have been detailed in the Level I and II Hydrogeology Report and have not been fully replicated in the EIS document prepared by GWS Ecological and Forestry Services. We concur with the need for groundwater triggers and the many years of data provide an opportunity to set trigger levels on a seasonal basis.	Establish Trigger levels as per comment 80	Harden
GRCA Comments	89	6. Impacts on flow volume, peak rates, and water temperature along the intermittent creek (Tributary B) on site and other permanently flowing, cold water creeks further downstream are a major concern. On site measures to maintain or improve creek hydrology should be implemented in accordance with existing policy.	Data from more than a decade of streamflow measurements confirm that there is a loss of water in Tributary B as it passes through the Hidden Quarry site, therefore all of the flow in Tributary B originates from the area upstream from the Hidden Quarry site and flow conditions will not change. There will be no discharge of water from the site and thus peak flow rates will not change. There are no groundwater contributions to Tributary B from the site, thus temperatures will not be affected.	No Action Required	

	90	7. We note that groundwater will be monitored for water quality impacts resulting from quarry activities at one upgradient monitor and one downgradient monitor. Our recommendation is that the proponent considers additional monitoring locations.	The greatest potential for water quality changes will occur in the quarry pond. The quarry pond will be excavated southwards from the northern edge of the quarry. Presently there are no suitable groundwater monitors downgradient of the proposed ponds other than located along the southern property boundary. not unreasonable to install two additional groundwater quality monitoring wells between the quarry pond the southern property boundary. These wells will act as sentry wells in regards to water quality changes ir aquifer. The groundwater flow direction through the site is southeasterly, thus dedicated groundwater quarmonitors can be installed in the Tributary B corridor and south of the East Pond. These are shown on Figur
GRCA Comments	91	8. It is requested that the limit of the PSW on this property be flagged at the appropriate time of year by the consultant and verified infield by the GRCA, using the protocols outlined in the Ontario Wetland Evaluation System, Southern Manual. It is also requested that the wetland boundary be surveyed and plotted on the Operational <i>Plan</i> .	8. The boundary of the Provincially Significant Wetland (PSW) will be staked/flagged by GWS staff in the sp after the leaves have flushed. Subsequent to GRCA field verification the wetland boundary will be surveye and plotted on the Operational Plan.
GRCA Comments	92	9. It is proposed to remove 0.2 ha of artificially-created wetland. As indicated above, additional field review with GRCA staff is required to verify the limit of the PSW on this site and to confirm that wetland removal is in accordance with Section 2.1 of the Provincial Policy Statement and Section 8.4.5 of the GRCA's Wetlands Policy.	
GRCA Comments		10. We agree that erosion, sediment, and dust control will be necessary on this site but suggest that the wetlands and intermittent stream would be more vulnerable than adjacent woodland areas. Consequently, the retention of 30 m treed buffers adjacent to all wetlands and the intermittent stream is warranted for this reason alone.	10. Treed buffers 30 m in width have been recommended adjacent to the PSW and the southern portion of intermitted stream. However, in the northern reach of the intermittent stream and adjacent to the unevalumeadow marsh (MAM3-2), a 20 m buffer was considered sufficient for the following streams.
			 The small wetland feature has not been previously mapped as part of the PSW and it does not exhibit any characteristics that would warrant its inclusion. Many PSWs on other development sites have been effectiv protected by buffers less than 30 m in width (i.e. 10 to 25 m) and the subject wetland is not a PSW.
	93		• Although the entire catchment area of the wetland has not been retained the resulting loss of surface run is considered minimal. Furthermore, the wetland does not receive any significant input of groundwater because the water table is about 2 m below the elevation of the streambed during the growing season. The moisture regime in the wetland is therefore mostly maintained by spring snowmelt, precipitation and peric inputs of surface water from the stream, all of which will be maintained in proposed post development conditions.
			• The land adjacent to the northern reach of the intermittent stream is mostly densely forested with gentle moderate slopes. There is no protective advantage in extending the from 20 m to 30 m. In our experience, intermittent warm/cool water streams do not warrant a setback of more than 15 m, even when they occur open, non-forested habitats. The proposed 20 m treed buffer already exceeds the normal requirements of Conservation Authorities and municipalities. We feel a site meeting with GRCA staff will help to resolve this concern. (GWS)
GRCA Comments			
GRCA Comments	94	11. The location of the proposed hydraulic barrier/silt curtain is questionable as it appears to traverse an existing wetland. It is suggested that the location be determined after the wetland boundaries have been verified in the field by the GRCA.	11. The proposed location for the hydraulic barrier/silt curtain appears to traverse a wetland feature accord to GRCA mapping. This area is actually an opening in a conifer plantation (CUP3-12b) and this will become evident during the site meeting with GRCA staff.
GRCA Comments	95	12. The use of forest inventory reporting standards and codes to describe vegetation communities is of limited use. The apparent lack of vegetation and soils information is especially problematic and provides only a limited understanding of the wetland communities on this site. The checklist of plant species in Appendix B provides information for the entire property and is also of limited use at the individual community level.	12. The subject property is almost entirely forested and this tree cover was established for forestry purpose and is currently managed for forestry purposes. It would therefore have been inappropriate to have descril
GRCA Comments	96	13. Were the soil descriptions contained in the Hydrogeological Assessment considered when classifying vegetation communities?	13. The vegetation communities were classified according to the surface soil conditions encountered during GWS fieldwork. Soil descriptions based on ELC procedures and the Field Manual for Describing Soils (OIP, 1 do not always correspond to the terminology used to describe soil materials in hydrogeological investigation of the terminology used to describe soil materials in hydrogeological investigation.
GRCA Comments	97	14. The Natural Environment Report confirms that the woodland on this site is approximately 33.5 ha in size, therefore is considered Significant Woodlands within the County of Wellington. The GRCA recommends that a site visit be scheduled with the County of Wellington and GRCA staff to verify the limit of the significant woodland on the subject property. The portions of the woodland that merit protection should be clearly distinguished from portions that will not be protected.	We agree that a site visit with GRCA and County staff would be most helpful to verify the limit of retained woodland on the property and also discuss the proposed buffer to be applied to the stream. As recomment on page 64 it was our intention to flag and/or stake the limits of natural features to be retained and protect and this can be done in advance of the required site meeting in order to facilitate the review process.
GRCA Comments	98	15. As noted in Section 7.1 of the Natural Environment Report- "The woodland also lies in close proximity to other woodlands and wetlands north and east of the subject lands. As such, they provide an important linkage to these natural features." The author speculates, however, that "these functions will not be significantly affected by the proposed loss of conifer plantation from part of the site." Please provide details on how the woodlands and wetlands on adjacent lands will not be affected by the loss of the conifer plantation from the subject lands.	15. The woodland to the north of the site is a narrow extension from the northeastern corner of the subject lands. Connections to this area will be maintained with the retention of the setback along the eastern prop line and the riparian corridor along the creek. Similarly, linkage to the eastern property will be maintained i the setback along this boundary. The setback at the southern end of the eastern extraction parcel will allow wildlife access to the deciduous forest and riparian corridor along the watercourse.
GRCA Comments	99	16. GRCA staff supports the retention of mature deciduous (FOD5-7) and mixed forest (FOM2-2 FOM4-2) stands on the subject property, but recommends the full retention of the mature cedar stand (FOC2-2), which currently buffers the interm ittent stream. It is further suggested that plantation areas adjacent to the stream provide a buffer and wildlife corridor function, and should be retained and enhanced where practicable. Additional rationale should be provided to support the recommended 20-30 stream buffer width.	Wish to discuss this with GRCA staff based on site visit. The Amabel is a provincially significant aggregate resource. Its use needs to be balanced with preservation of the onsite features. We agree that a site visit v GRCA and County staff would be most helpful to verify the limit of significant woodland on the property an also discuss the proposed buffer to be applied to the stream. As recommended on page 64 it was our inten to flag and/or stake the limits of natural features to be retained and protected and this can be done in adva of the required site meeting in order to facilitate the review process.

er /. It is id and in the juality ure 7.	Add two Water Quality Monitoring Locations to site plan and Monitoring Plan.	Harden Stovel
spring yed	Stake wetland prior to GRCA visit.	GWS
r ice of	Review Wetland enhancement proposal in the old pit area in the field with GRCA Staff	GWS
of the aluated ny tively	Review areas where 20m buffer is proposed with GRCA staff in the field.	GWS
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ording e	As per comment 91 this issue will be resolved during site visit.	GWS
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pendix may ular		
ing , 1985) tions.	No Action Required	
d ended ected	Stake limits of natural features to be retained in advance of site meeting with GRCA staff.	GWS
ect roperty d in ow	No Action Required	
t with and ention lvance	See Comment 97 .	

	100	17. An intermittent creek and floodplain traverses the woodland area and ultimately connects two large natural areas offsite. According to the Significant Wildlife Habitat Technical Manual, animal movement corridors exist at different scales and encompass a wide variety of landscape features, including riparian zones, stream and river valleys, wetlands, and woodlands. Therefore, a wildlife movement corridor may exist across the subject property. It is recommended that the OMNR's Draft Ecoregion Criteria Schedules be consulted to determine whether or not the woodland provides significant wildlife habitat and the EIS updated accordingly.	According to the draft eco-regional criteria, significant animal movement corridors exist only for amphibia and white-tailed deer. Significant corridors for deer are to be identified only if significant wildlife habitat f been identified for deer wintering areas. The intermittent creek and floodplain do not support significant amphibian populations and therefore no significant corridor function should be ascribed to this area. The on-site and adjacent marshes do support significant amphibian breeding populations. The buffers that will be established around these will suffice protect the upland habitat requirements of these species. The eco-regional criteria are in draft form and went through the EBR process in 2012. As a result of that re it was determined that the thresholds for significance were too low for many of the criteria. Consequently thresholds for significance will have to be updated (John Boos, pers. comm. to A. Sandilands, 2012), but the not occurred yet. Mr. Boos is the Renewable Energy Field Advisor for MNR and was in charge of developin eco-regional criteria. Given that the final thresholds for significance are unknown, the eco-regional criteri cannot be used at present. The Natural Heritage Reference Manual states on page 84 that the finalized eci regional criteria will provide additional information, but that the Significant Wildlife Habitat Technical Gui (SWHTG) "is still the authoritative source for the identification and evaluation of significant wildlife habitat Under these circumstances, the eco-regional criteria as they exist now should not be used and the SWHTG should be used to define significant wildlife habitat. In deciding which habitats should be considered signific the SWHTG uses a representative approach and recommends designating the best 2 or 3 examples of a particular habitat within a planning jurisdiction as significant wildlife habitat. For habitats that are poorly represented in a planning area, all examples of habitats may be considered significant, but only the best examp
GRCA Comments			that has been taken within the EIS.
GRCA Comments	101	18. The Natural Environment Report demonstrates that the following Significant Wildlife Habitat is present on the subject property: a. Amphibian Woodland Breeding Ponds- comprise a diverse frog community, formerly consisting of the provincially rare (S3) and nationally threatened Western Chorus Frog b. Habitat for a species of Conservation Concernbreeding and foraging habitat for Snapping Turtle. c. Breeding Habitat for area-sensitive bird species (i.e Ruffed Grouse, Hairy Woodpecker, and Phieated Woodpecker) d. Winter Habitat for Deer and Wild Turkey The presence of these species indicates that the property contain a Significant Wildlife Habitat and the OMNR should be consulted regarding direct, indirect and induced impacts to the Significant Wildlife Habitat and the EIS updated accordingly.	 18. We agree that there is significant habitat on the subject lands for breeding amphibians and snapping 1 and have considered them within the EIS. We are of the opinion that there is no significant habitat present for area-sensitive breeding birds within th site. Low numbers of species and pairs were present and there are certainly better examples of habitat for sensitive breeding birds within the township and county. This is one of the more poorly done eco-regional criteria as the threshold is a mere 3 pairs of area-sensitive birds to qualify as significant wildlife habitat. The same threshold is applied throughout Eco-regions 6 and 7. Consequently, the same threshold for significant used for heavily forested areas such as the Norfolk Sand Plain, Niagara Escarpment, Bruce Peninsula, and Manitoulin Island as for sparsely forested areas such as Essex and Chatham-Kent. If the original threshold significance were applied to these areas, virtually every woodland in the heavily forested areas would quas significant wildlife habitat while many significant woodlands in the sparsely forested areas would quas because the threshold may be too high in some of these cases. This eco-regional criterion for area-sensitiv breeding birds will have to be revised significantly before it is useful. We disagree that there is significant winter habitat for deer. According to the SWHTG, all significant deer wintering areas are identified by the MNR. Given that MNR has not identified any significant deer wintering areas are identified by the MNR. Given that MNR has not identified any significant way be conside absent. The site also does not support significant Wild Turkey winter habitat. Winter wildlife habitat may be conside absent. We concur that the OMNR will review the EIS with respect to impacts on significant wildlife habitat.

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	19. We do not agree that "the subject property is not considered important for water protection as it does not represent a	There are three multi-level groundwater monitors on the site and all three have downward hydraulic gradients	No Action Required
			No Action Required
	and adjacent to this site. A lowering of the groundwater table on this site could further reduce or eliminate groundwater inputs	losing stream throughout the site confirmed by streamflow measurements and groundwater monitors installed	
	control reaction and ended to address.	not have any 'flowing' wells registered in the vicinity of the site. The report Integrated Water Budget Report,	
		Grand River Watershed prepared by Aqua Resources, 2009 identifies the area around this site as a recharge	
		area (Figure 8). Thus, there are no upward gradients at this site let along strongly upward gradients at this site.	
		Based on this evidence, the site is not an area of sensitive groundwater discharge. Groundwater recharge	
		occurs at the site, however, other than along the Tributary B corridor which will not be altered, groundwater	
	102	recharge at this site is not significant relative to the surrounding area. In addition, the creation of an excavation	
		will result in the continued recharge of the bedrock aquifer. Thus there is no change in hydrologic function in	
		regards to groundwater recharge. The site is not located in the headwater area of Blue Springs Creek. Blue	
		Springs Creek originates several kilometers to the east of this site. Tributaries A, B and C near to the Hidden	
		Quarry Site contribute runoff to Blue Springs Creek during the spring freshet and this function of the tributaries	
		will not change as a result of the quarry activities. Thus, it is our conclusion that the site does not represent a	
		sensitive recharge, discharge or headwater area.	
GRCA Comments			
	20. The GRCA is supportive of the progressive and final rehabilitation plans (Section 7.6) and supports the recommended	Agree. The wetland area which is proposed to be altered is entirely the result of past aggregate extraction and	See Comment 92 GWS
	wetland restoration and enhancement plans for this site. Although the restoration or creation of additional marsh habitat on the	we believe the site meeting with GRCA staff will help to clarify this matter, particularly with respect to Section	
	103 site is supported, it will be necessary to demonstrate that the alteration of an existing wetland could be consistent with the	6.2.7.5 of the GRCA's Wetland Policy.	
GRCA Comments	GRCA Wetlands Policy.		
	21. Staff discourage the planting of ash species, which are increasingly susceptible to outbreaks of the Emerald Ash Borer.	21. We agree that ash trees should not be used for replanting purposes due to anticipated future mortality	Remove Ash from Site Plan Notes Stovel
GRCA Comments	104 21. Start discourage the planting of ash species, which are increasingly susceptible to butbleaks of the Emerald Ash Boler.	caused by Emerald Ash Borer. This species will be deleted from the Site Plan notes.	
	22. A detailed assessment of potential impacts associated with the construction and maintenance of the proposed stream	22. To facilitate aggregate extraction from the east side of the property it is necessary to install a culvert in the	Prepare culvert detail for review by GRCA staff and subsequent inclusion Stovel
	crossing and recommended mitigation measures are required. Additional detail regarding culvert length, diameter, depth,	stream. To minimize potential aquatic impacts, culvert installation must be carried out when there is no flow in	onto site plan.
	and type (CSP or box culvert) are required.	the stream which typically occurs during late summer/early fall. Silt screen and/or straw bales should	
	105	nonetheless be installed on the downstream side prior to culvert installation in order to prevent possible	
		downstream sedimentation caused by a flash flood during a major storm event. Detail will be provided for	
GRCA Comments		review by GRCA staff.	
	106 23. Figures 10, 11, and 12 are missing from the Level 2 report and should be forwarded to this office for our review.	Agree - the Figures mentioned in the Natural Environment Report are the Site Plans Pages 2,3,4 - which	No Action Required
GRCA Comments	100	accompany the submittal package but are not in the Level 2 report.	



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

Our File: 9506

Date: March 13, 2013

Grand River Conservation Authority, 400 Clyde Road PO Box 729 Cambridge ON, N1R 5W6

Attention: Heather Ireland, Resource Planner

Dear Ms. Ireland:

Re: Response to GRCA comments regarding Hidden Quarry Guelph-Eramosa File ZBA09/2012 Cumulative Effects Assessment Issues

We are pleased to respond to the comment made by the GRCA in your letter of January 31, 2012 in regards to the applicability of the document: *Cumulative Effects Assessment (Water Quantity and Quality) Best Practices Paper for Below Water Table Sand and Gravel Extraction Operations in Priority Subwatersheds in the Grand River Watershed- September 2010.*

Our comments on the pertinent aspects of this paper are as follows:

Section 2.1: Initial Assessment

1) Proximity to other licenced pits and quarries, evaporation, surface water drainage and water balance.

The proposed Hidden Quarry is several kilometers from the nearest licenced pit or quarry and there are no other licensed pits or quarries in the Blue Springs Creek subwatershed (Figure 1). There is no potential for the overlapping of areas of influence between the proposed Hidden Quarry and the nearest licenced pit or quarry.

The development of two lakes at the Hidden Quarry site will result in an increase in evaporation from the Blue Springs Creek subwatershed. The estimated increase in evaporation is estimated to be 18,765 m³/year. The Blue Springs Creek subwatershed has an approximate area of 44 km². The estimated evapotranspiration rate from this watershed is 517 mm/y resulting



in a total evapotranspiration volume of 22,800,000 m³. Thus the increase in evapotranspiration expected to occur at the quarry represents a 0.08% increase in loss of water from the watershed annually. This is an insignificant increase being neither measureable nor problematic to flora and fauna in the watershed.

As discussed in Section 4.4 of the Hydrogeology Report, runoff from small portions of microdrainage areas D1 and D2 will be reduced. Drainage from micro-drainage area D1 reports to Tributary C, an intermittent stream and drainage from micro-drainage area D2 reports to Tributary B. There are no other pits or quarries on these streams thus cumulative impacts cannot occur.

2) Proximity to other proposed pits and quarries

There are no other proposed pits or quarries in the Blue Springs Creek subwatershed and thus cumulative impacts cannot arise.

3) Level of Existing Environmental Degradation

According to the Eramosa River Blue Springs Creek Watershed Study (Beak, 1999) the watershed has high quality aquatic communities and there is no indication that the water quality is deteriorating. The report identifies four main areas of potential stress to the watershed being;

- Species introductions,
- Ponds and weirs (interpreted as on-line features),
- Channel alterations and
- Riparian vegetation loss.

The proposed Hidden Quarry will not have any effect on any of these stress factors. Thus, the proposed quarry will not exacerbate the condition of any existing degraded environment in the watershed. Although the site development will result in two large ponds, there is a significant distance between the ponds and Blue Springs Creek or its tributaries to negate any thermal impact.

4) Potential Impact on "Stress" Assessment of Eramosa River/Blue Springs Creek

The most current stress assessment for the Blue Springs Creek Subwatershed is *moderate*. The moderate stress assessment is mainly due to the surface water taking by the City of Guelph at their Arkell facility. The stress level is determined by the **demand** for water-calculated from Permitted water takings (from PTTW's), **water supply**-calculated from the median flow in the Eramosa River at Watson Road and the **water reserve**-calculated as the 90th percentile of



monthly median flow (i.e. flow which is exceeded 90% of the time) in the Eramosa River at Watson Road.

The proposed Hidden Quarry will neither require a Permit to Take Water (therefore no increase in demand) nor diminish flow in the Eramosa River as measured at Watson Road (therefore no change in supply or reserve). Thus, the quarry will not affect the stress level of the Eramosa River.

5) Proximity to Municipal Water Wells

The nearest active municipal well is TW3/02 located 2.2 km from the site. Municipal Well TW2/02 is located approximately 1000 m from the site and is presently inactive. The wells are shown on Figure 2 of this response. The proposed quarry is not within the well head protection area of either well and will not affect the vulnerability of either well. Neither well obtains water from the bedrock aquifer beneath the quarry.

6) Vulnerability of Groundwater Resources

Figure 3 is obtained from the Guelph Eramosa Regional Groundwater Characterization and Well Head Protection Study (2004) and Figures 4 and 5 are sourced from the Aqua Resources 2010 Final Groundwater and Surface Water Vulnerability Report prepared for the City of Guelph. The bedrock aquifer on the proposed Hidden Quarry site and surrounding areas are overwhelmingly classified as having a high vulnerability. The quarry will not increase the vulnerability status of the aquifer.

7) Local Scale Cumulative Effects

The local scale cumulative effects are clearly described in the Level 1 and Level II Hydrogeology Report prepared by Harden Environmental. There are no other nearby extractive operations and therefore there will be no local scale cumulative effects.

8) Section 2.3 Watershed / Subwatershed Scale Cumulative Effects

Figure 1 clearly shows that there are no other extractive operations within the Blue Springs Creek subwatershed and therefore, cumulative effects need not be considered at this time.



Section 3.1 Data Collection

Quantity

James Dick Construction Ltd. is committed to detailed data collection around the quarry and will be able to detect potential interference with private wells, alteration of the position of the water table, quantity of water discharging to or recharging from ponds, streams, wetlands and springs. The monitoring program will allow for the evaluation of the effect of below-water-table extraction, creation of ponds and the effect of permanent surface ponds on surface water and groundwater quantity.

The monitoring program described in Section 6.1 of the Hydrogeology Report will be used to determine if there are any changes to water levels and stream flows in the area of influence of the quarry.

Quality

An annual water quality testing program has been recommended. It will take several years for the removal of the sand and gravel resources and several more years for the quarry to grow to an appreciable size. The below water table extraction will commence in the northern portion of the quarry, the farthest away from downgradient wells. Thus there will be several years of water quality testing prior to the quarry approaching the southern property boundary.

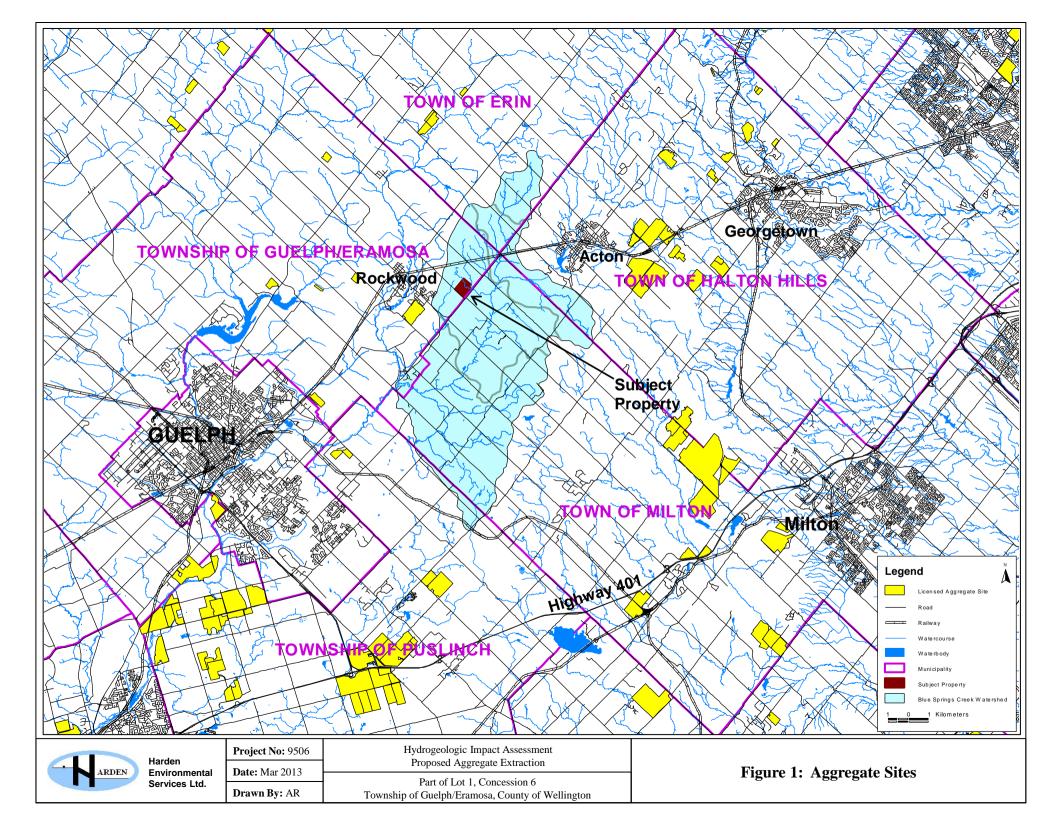
We trust that this letter adequately confirms that the proposed Hidden Quarry complies with all aspects of the document: *Cumulative Effects Assessment (Water Quantity and Quality) Best Practices Paper for Below Water Table Sand and Gravel Extraction Operations in Priority Subwatersheds in the Grand River Watershed- September 2010.*

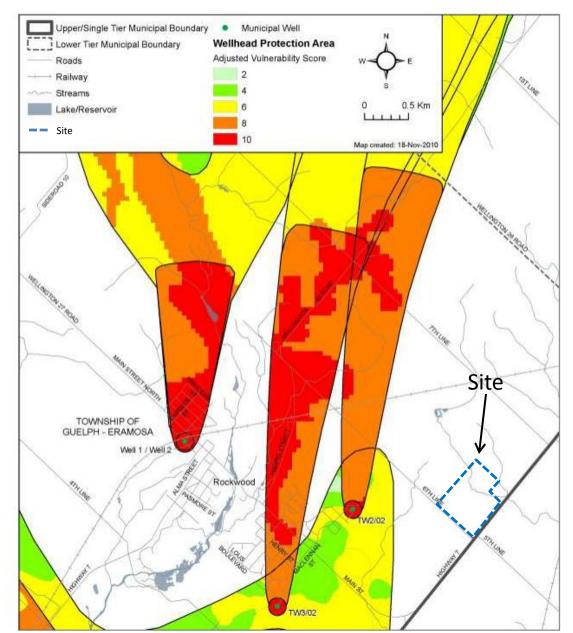
Please do not hesitate to contact Stan Denhoed (519) 826-0099 or Greg Sweetnam (905) 857-3500 if any additional information regarding cumulative effects assessment is required.

Sincerely,

Harden Environmental Services Ltd.

Stan Denhoed, P.Eng., M.Sc. Senior Hydrogeologist





Map 7-49: Rockwood Water Supply Wellhead Protection Area Final Vulnerability

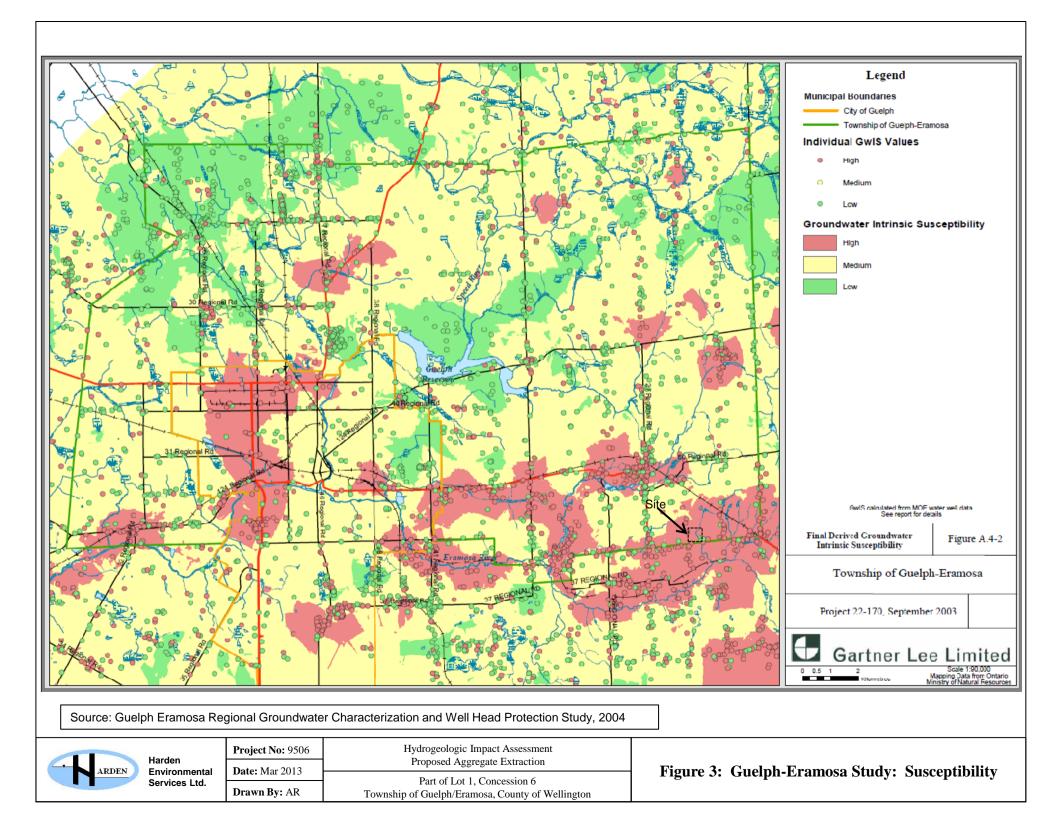
Source: Grand River Source Protection Area, Approved Assessment Report, August 16th, 2012

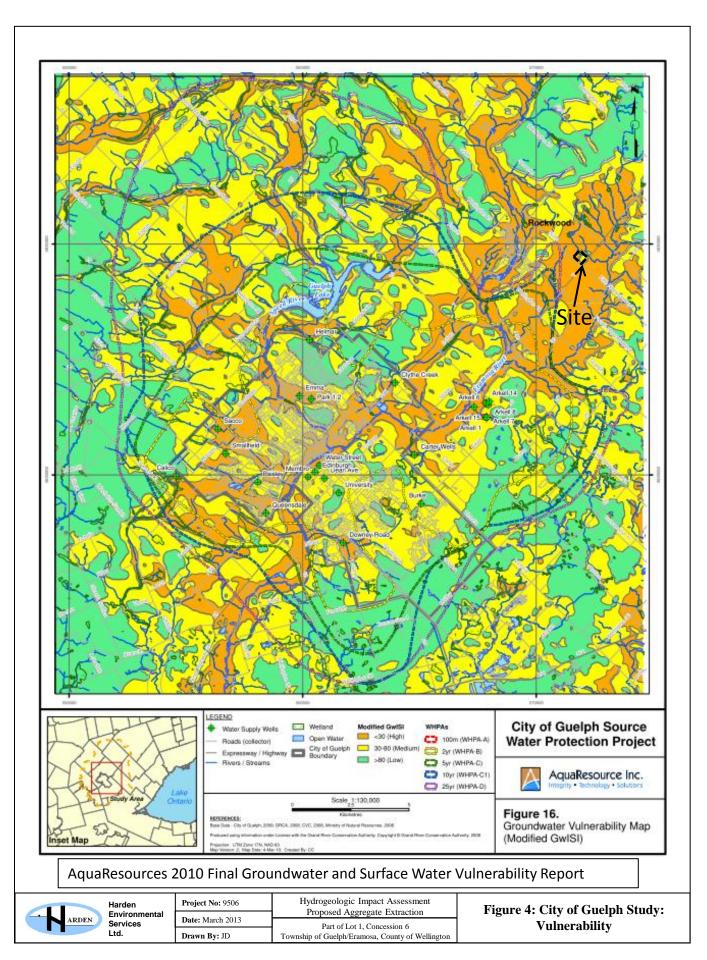


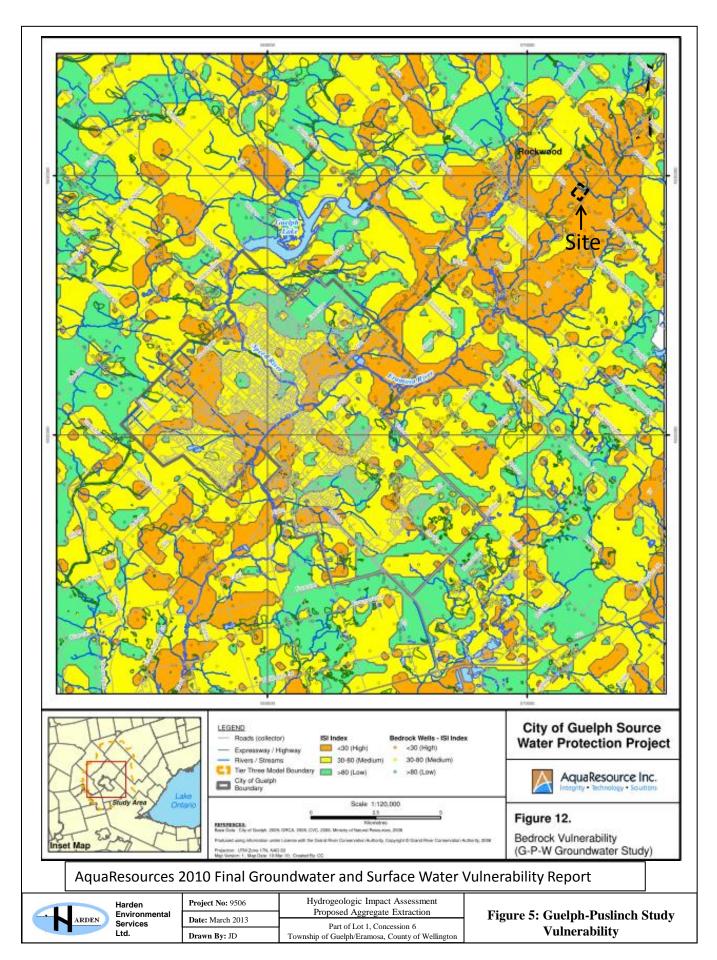
Harden	Project No: 9506
Environmental Services	Date: March 2013
Ltd.	Drawn By: JD

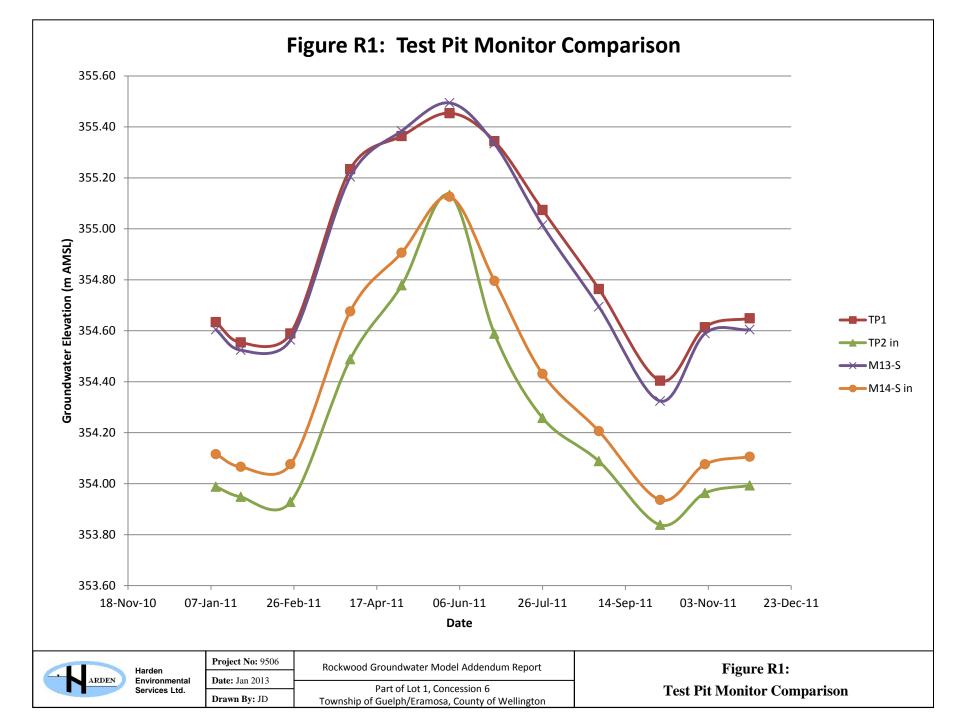
Hydrogeologic Impact Assessment Proposed Aggregate Extraction
Part of Lot 1, Concession 6 Township of Guelph/Eramosa, County of Wellington

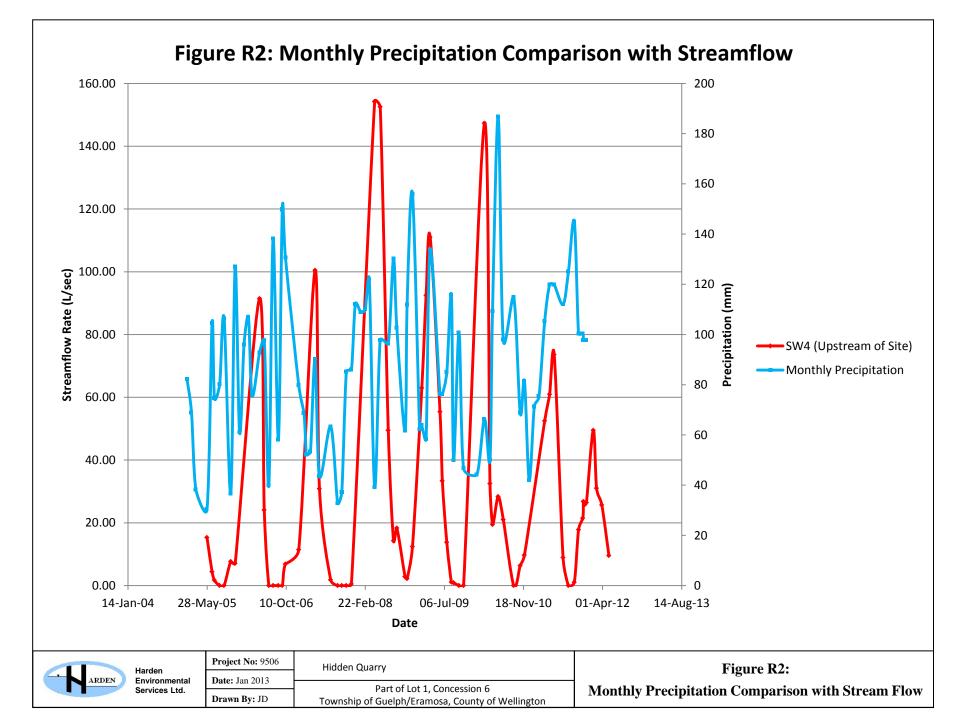
Figure 2: Rockwood Wells

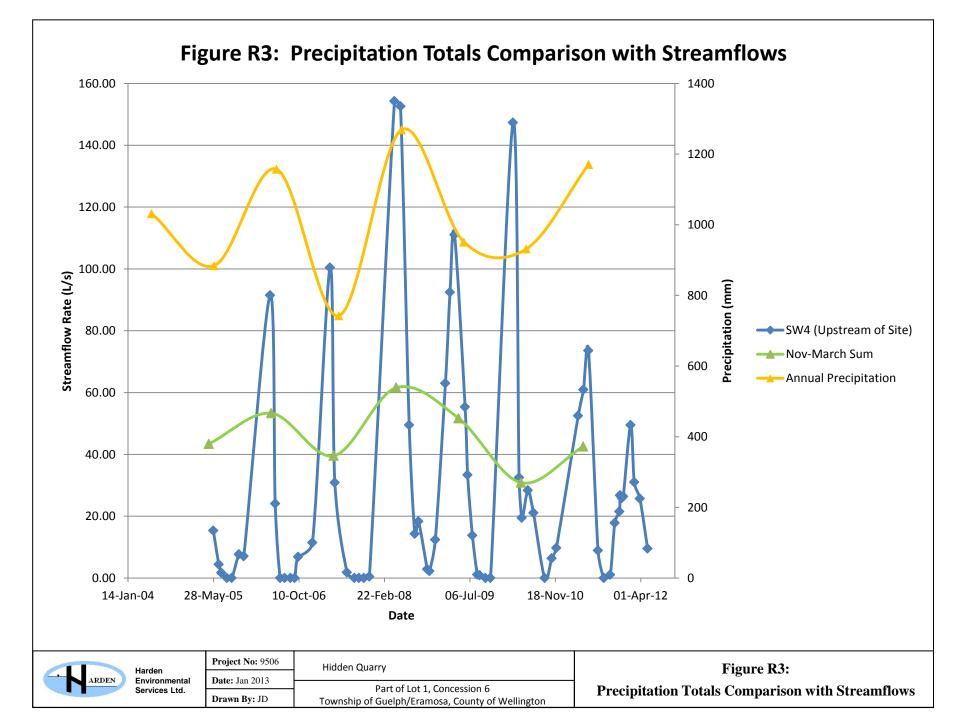


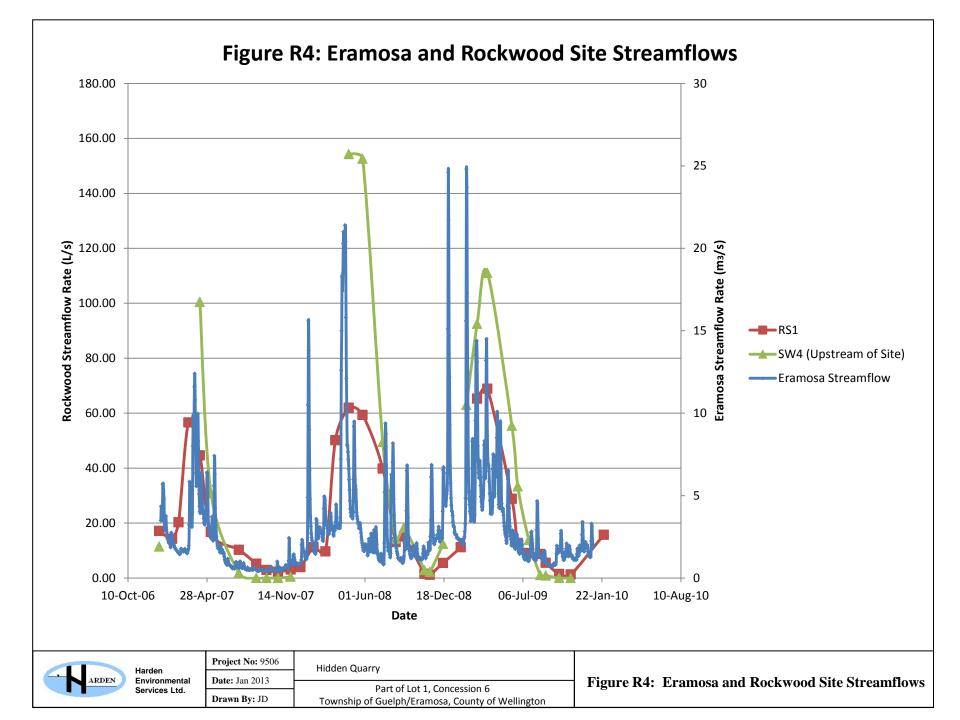


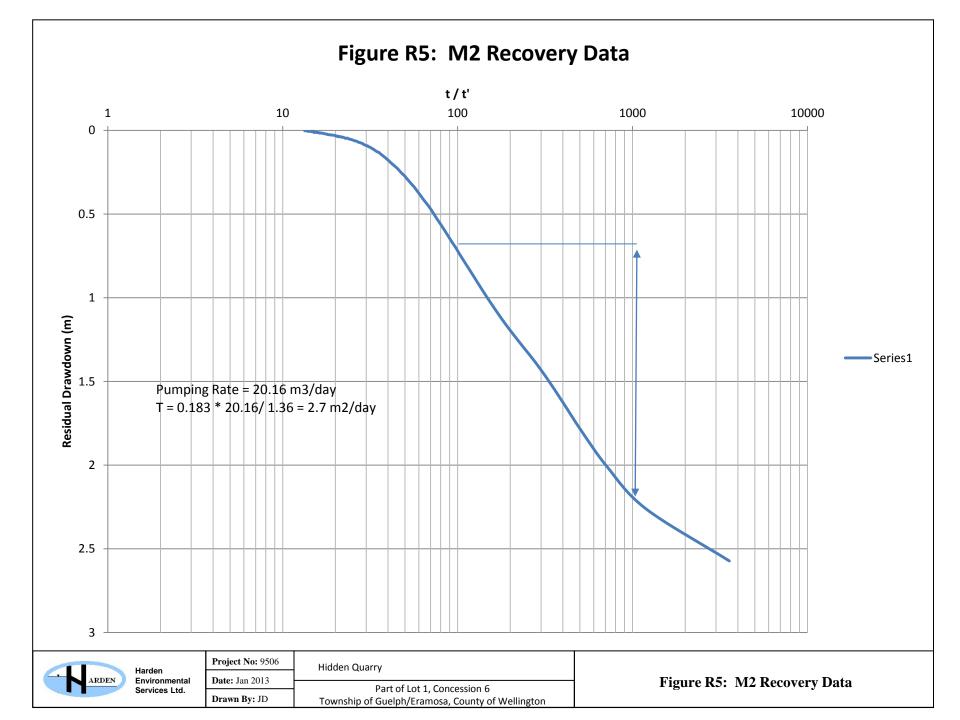


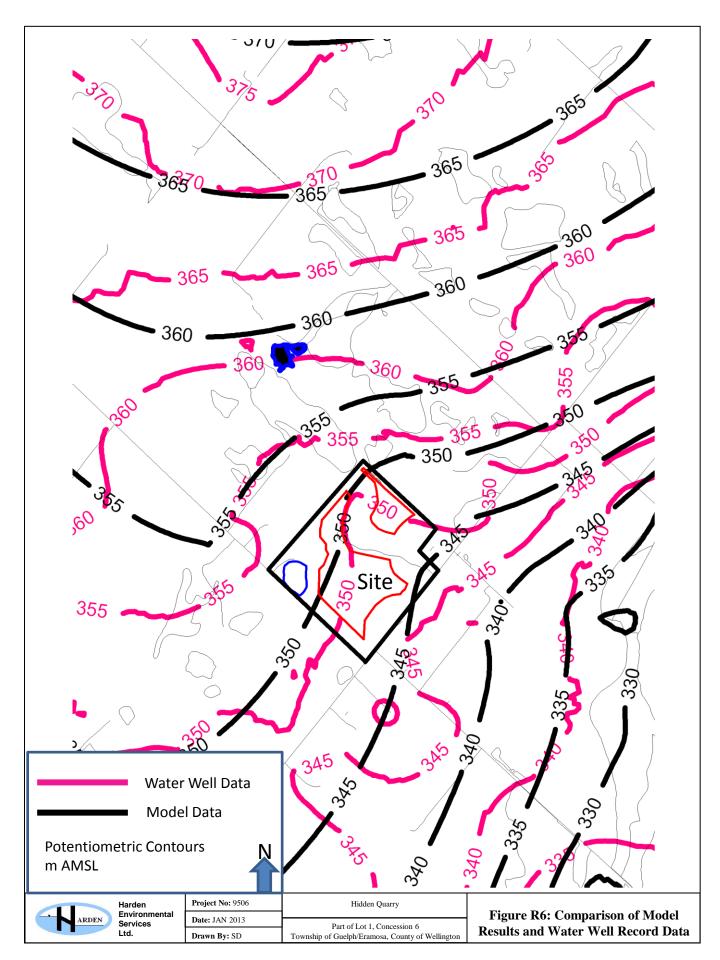


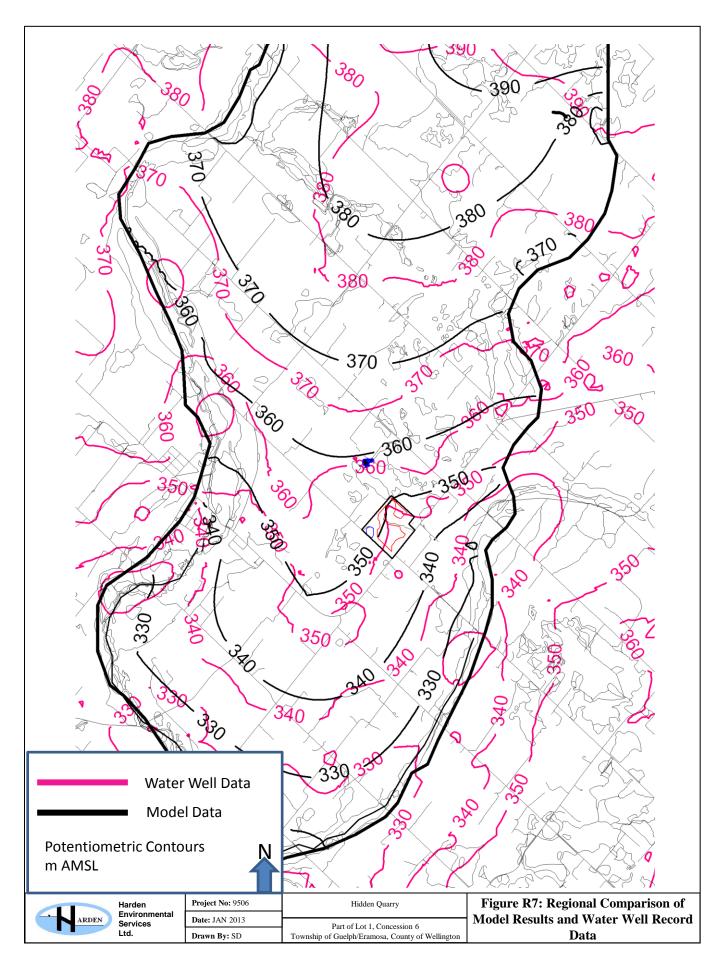


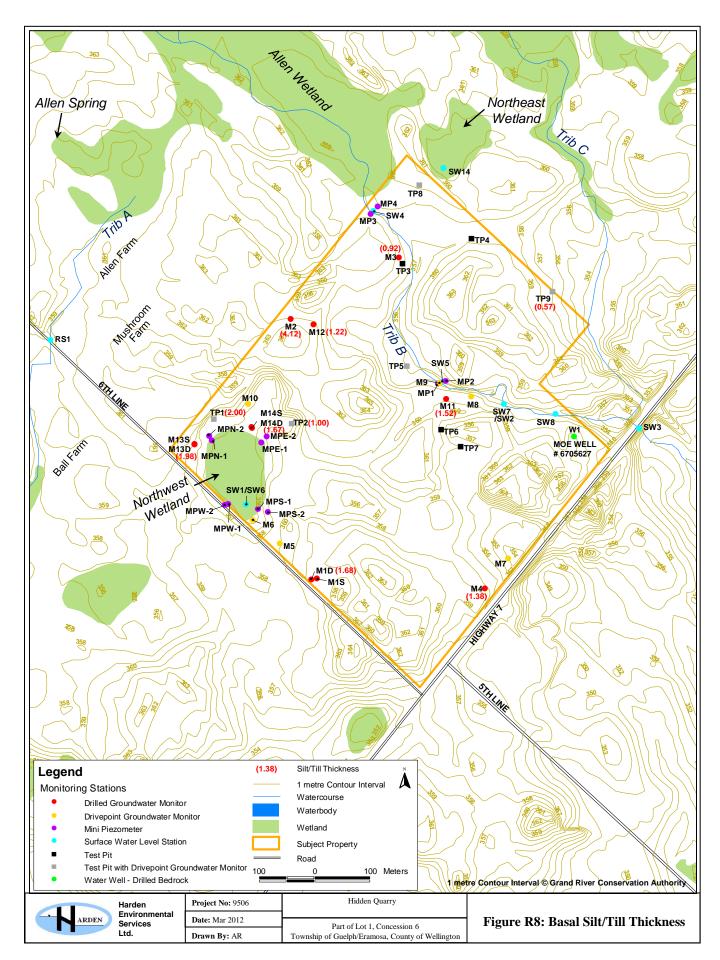


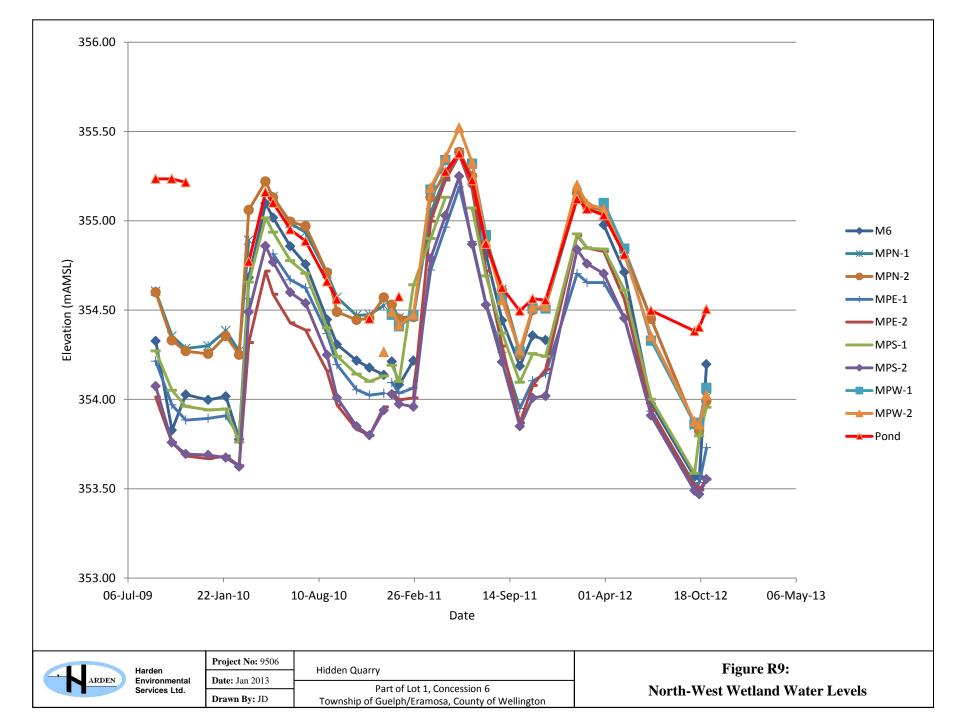


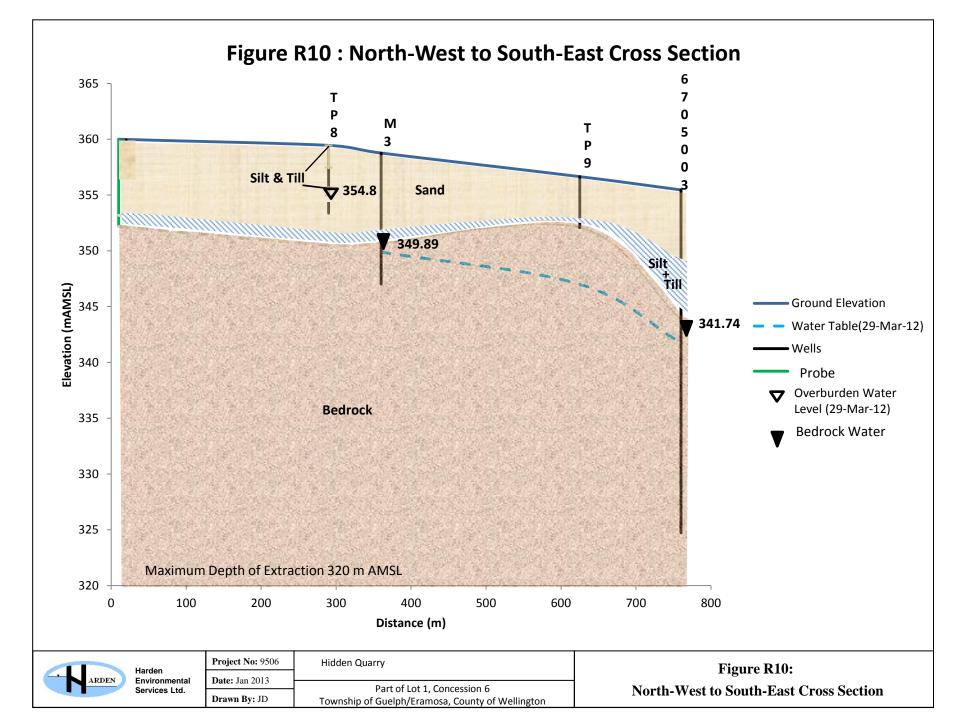


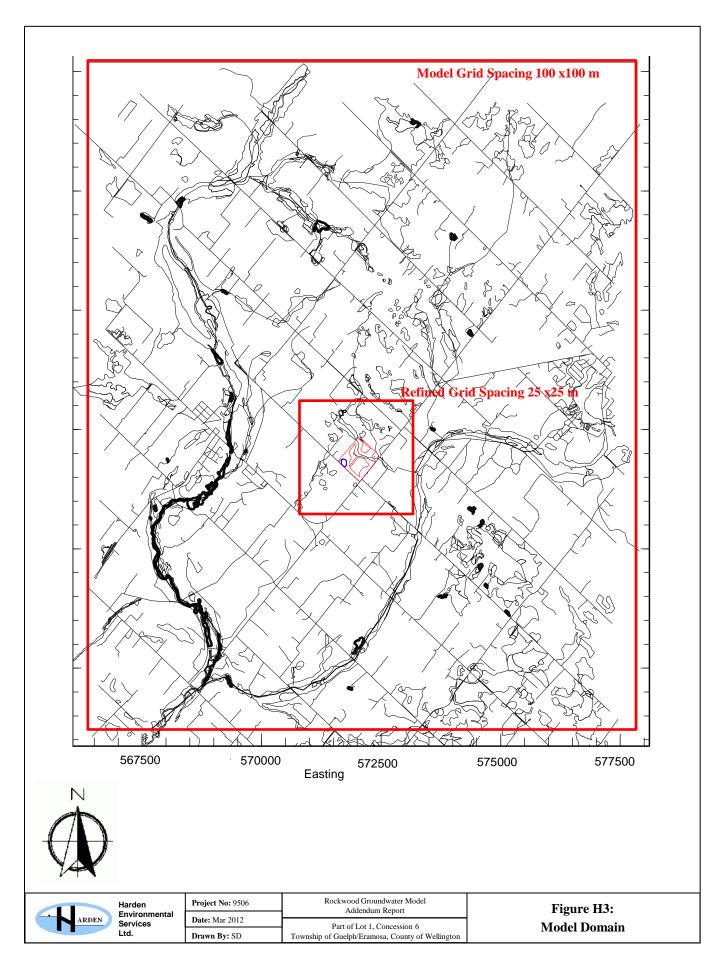


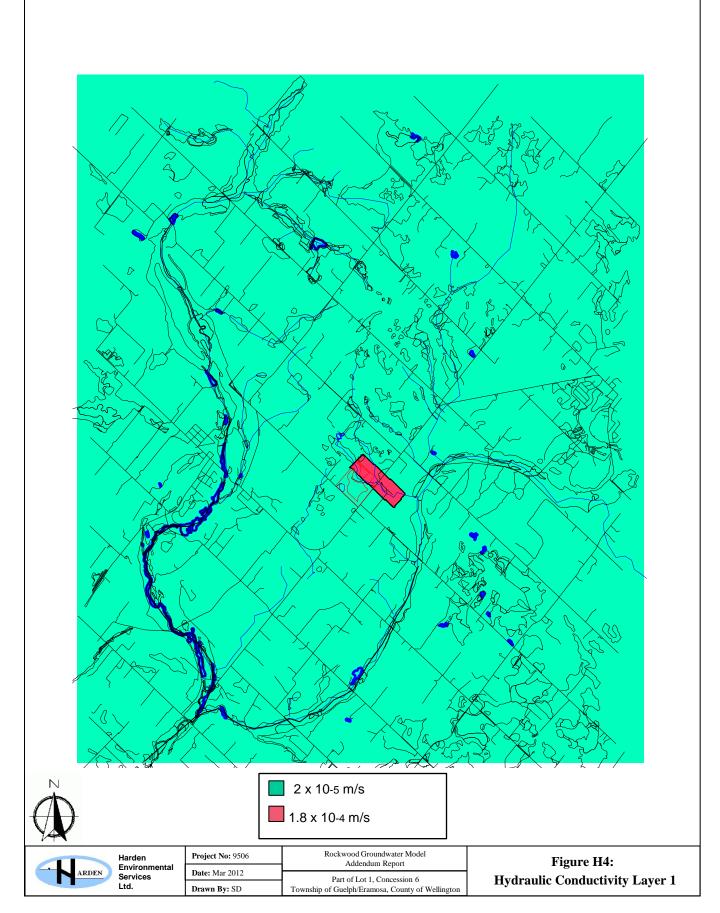


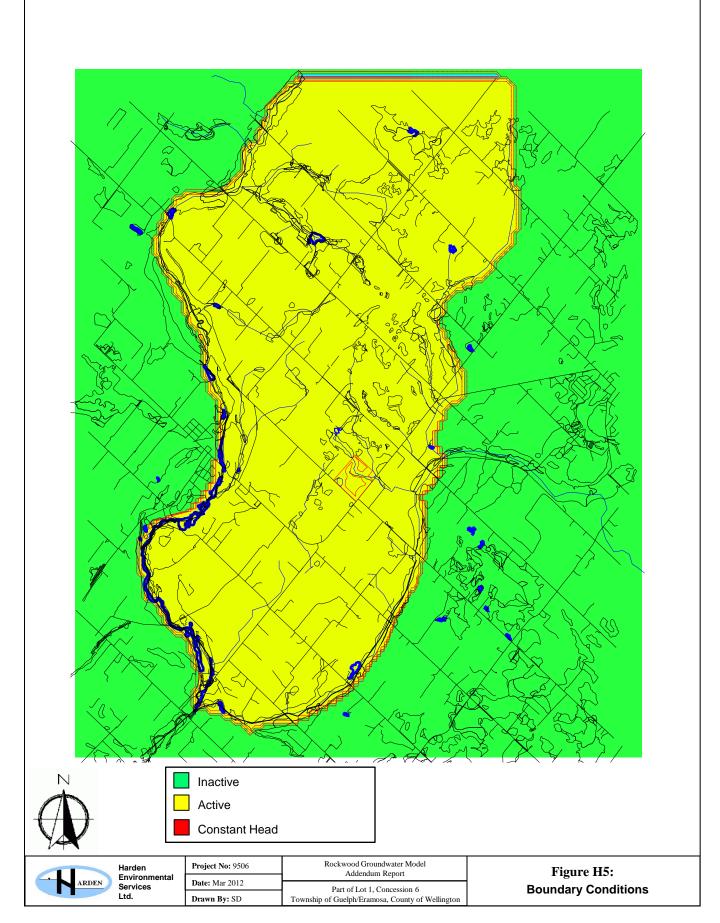


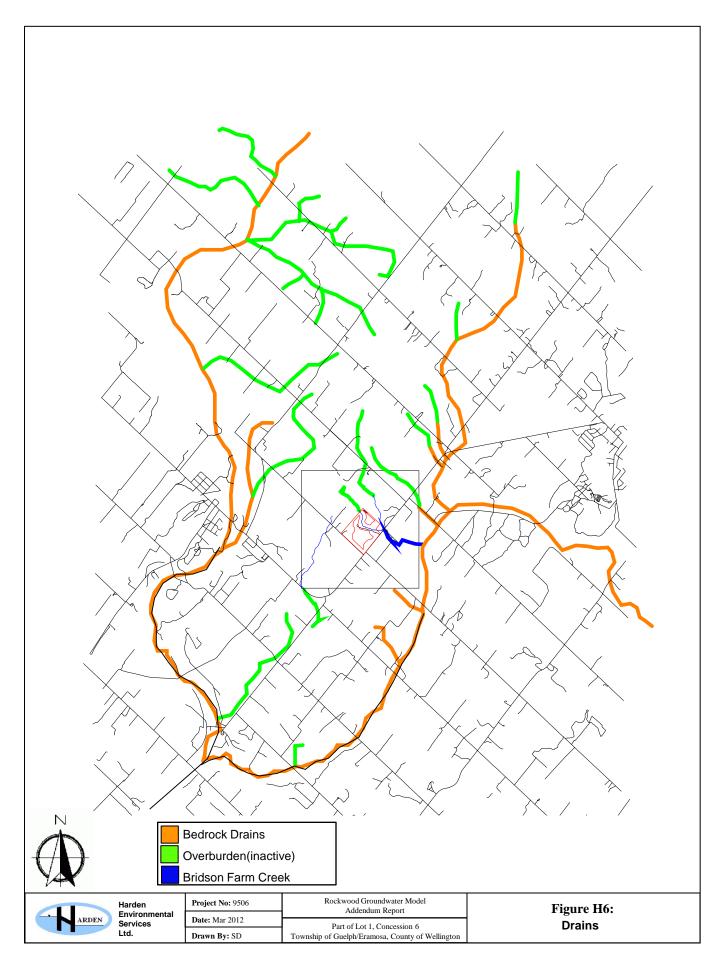


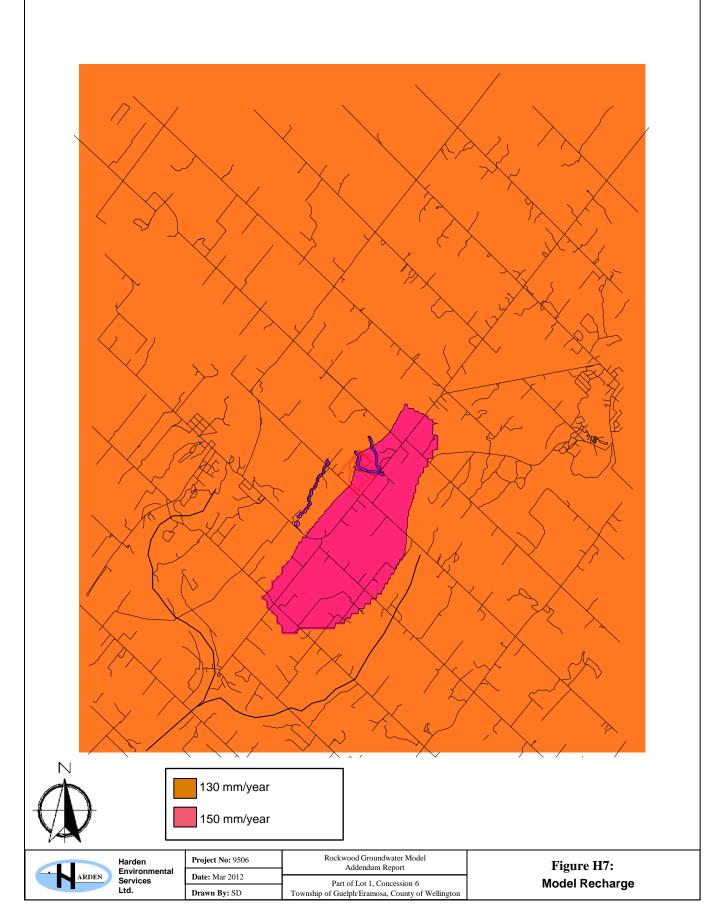








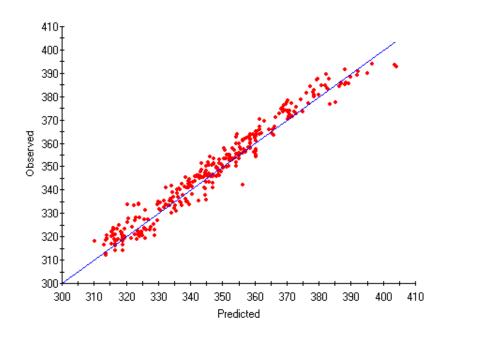




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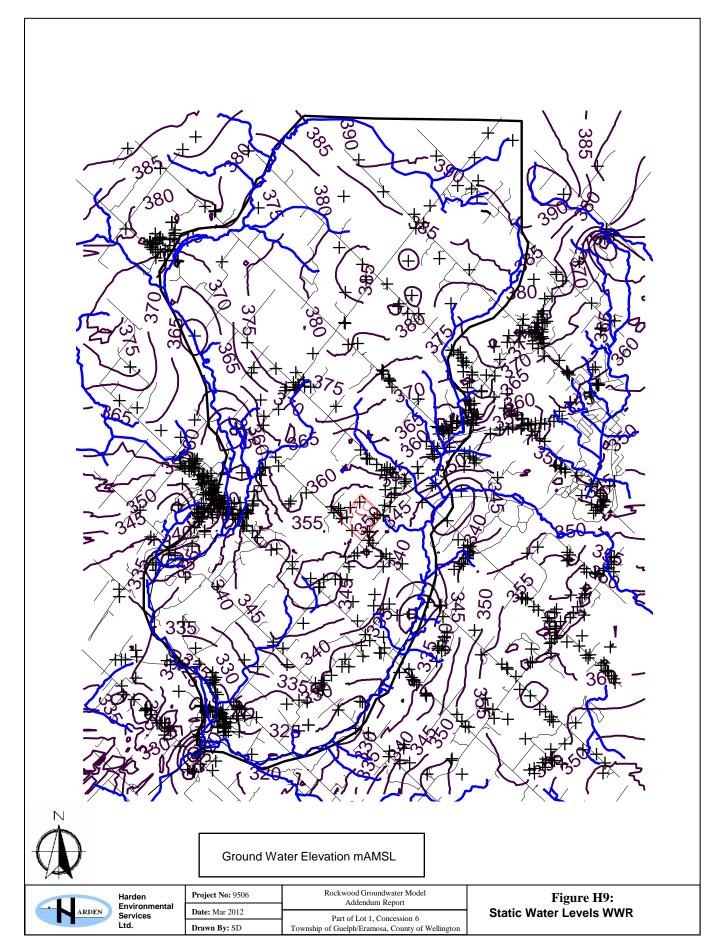
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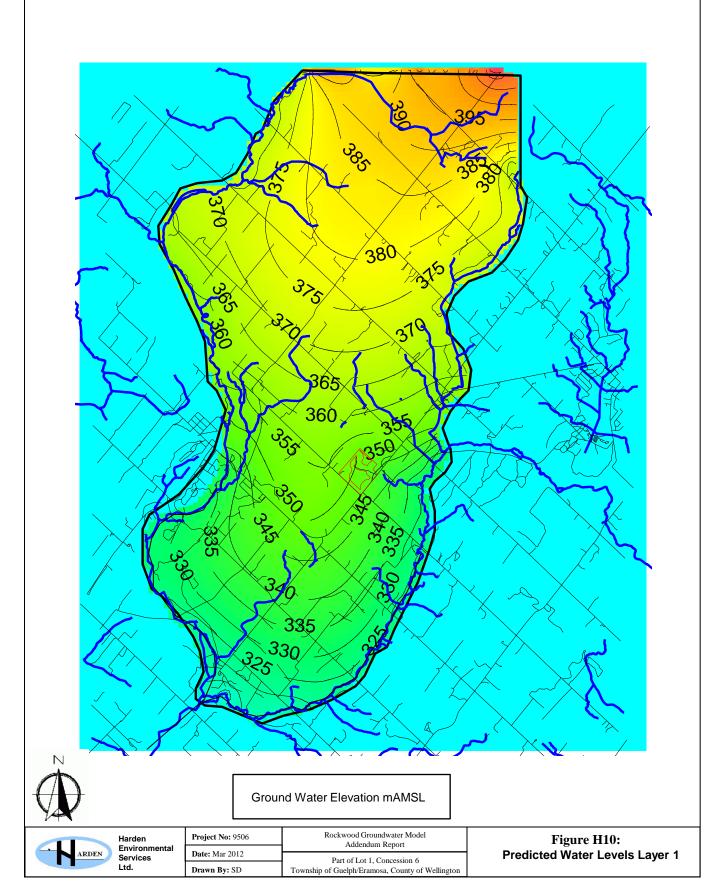


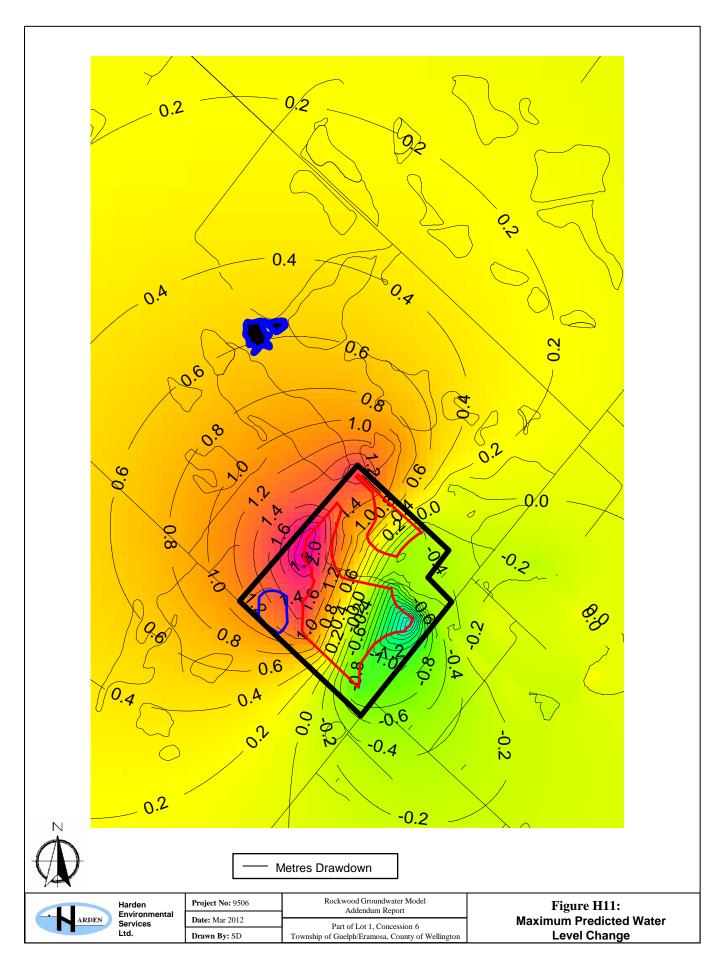


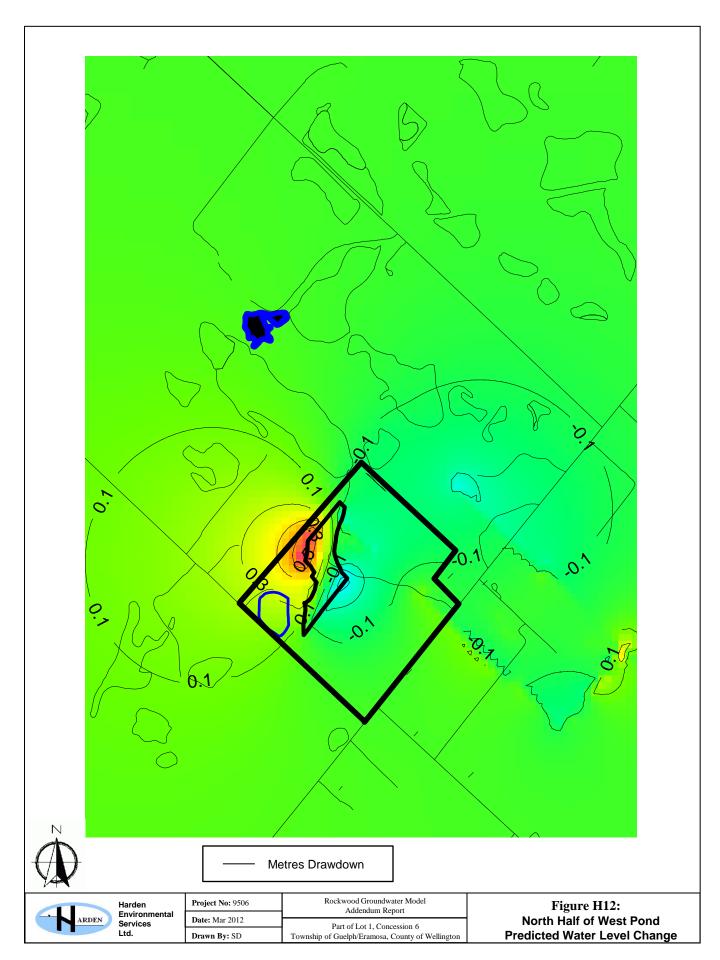
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Harden Environmental Services Ltd.	Project No: 9506	Addendum Report	Figure H8: Calibration Statistics	
	Date: Mar 2012	Part of Lot 1, Concession 6 Township of Guelph/Eramosa, County of Wellington		
	Drawn By: SD			









400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6



Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

April 15, 2013

Jason McLay Ministry of Natural Resources 1 Stone Road West Guelph, Ontario N1G 4Y2

Attention: Jason McLay

 Re: Proposed Hidden Quarry - 634745 Ontario Limited (James Dick Construction) Class A, Category 2 Pit and Quarry License and Zoning By-law Amendment Application ZBA 09/12 (Hidden Quarry) Lot 1, Concession 6, Former Township of Eramosa 8352 Highway 7, Township of Guelph/Eramosa

Grand River Conservation Authority staff are in receipt of an ARA application for a Category 2 Class A Pit and Quarry license. We have previously provided comments dated January 31, 2013 regarding a zoning by-law amendment application, the purpose of which is to change the zoning of the subject property from "A" Agricultural to "M3" Extractive Industrial to allow for an aggregate extraction operation. GRCA recommends deferral of the ARA application and zoning by-law amendment until our comments have been addressed and GRCA Staff are provided an opportunity to conduct a site visit to be scheduled between County Staff, GRCA Staff, OMNR and the proponents at the appropriate time of year prior to our support of this application.

GRCA staff are currently reviewing the GRCA Cumulative Effects Paper prepared by Harden Environmental and will provide comments upon completion of review.

Technical Staff had the opportunity to review the Comment Matrix Cuesta March 12, 2013 and Figures 10, 11 & 12. We can provide the following comments on the response matrix and plans:

- 1. Harden Environmental Services Ltd has satisfactorily addressed GRCA comments regarding confirmation of backwater elevations flood plain through response #85. Please update plans to demonstrate that excavation boundaries and proposed buffers are beyond this elevation.
- 2. With respect to response #86, the proponent and GRCA will discuss on-site the requirements for a fluvial geomorphologic assessment to establish the meander belt width and setback requirements.
- 3. Given the cold water fish habitat classification downstream of the proposed quarry site, the required completion of the fluvial geomorphologic assessment and given our concerns regarding a potential drawdown in the headwater reaches of this unnamed tributary of Blue Springs Creek, an appropriate extraction setback from the intermittent Tributary B on the subject property still needs to be determined.

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- 4. With respect to responses #87 & 88, the GRCA's principal concern is wetland hydroperiod, which would include the depth, duration, and extent of ponding or flooding within wetlands both on and off the subject property. The proponent should examine if there is an increased downward gradient during extraction and provide results for review to the GRCA.
- 5. The silt barrier will only serve to prevent lateral groundwater flow out of the wetland. According to Figure 3.10 of the hydrogeological assessment (Harden 2012), the bedrock groundwater levels are just below the bottom of the southwest wetland. Figure 5.1 further suggests that there is groundwater flow out of both wetlands under existing conditions. How was the location of the silt barrier chosen? Will shallow groundwater movement into the southwest wetland be maintained? Again, we suggest that the location and design details be discussed at the site meeting and after the wetland boundaries have been verified in the field by the GRCA.
- 6. With respect to response #89, there is some concern that flows further downstream along Tributary B will be reduced further as a result of the maximum predicted drawdowns within the headwater wetland upstream of the site (see Harden 2012, Figure 4.3). The streamflow data for the last decade is for on-site conditions of the Tributary B only. The impacts downstream should be examined and results provided for review by the GRCA.
- 7. The context of the comment was clarified with the response #102; however, what are the implications to Tributary B within its surface catchment area? Will the surface water and shallow ground water movement be sufficiently maintained?
- 8. With respect to response #90, a pizemoeter would need to be installed upstream of the subject lands in order to monitor water levels and temperatures of the creek entering the site to be used for baseline measurements. Updated site plan and monitoring plan to reflect the two additional Water Quality monitoring locations and upstream monitoring locations should be submitted to our office for review.
- 9. Page 2 of the Operations Plan provides technical recommendations for the monitoring plan. Staff suggests that monthly measurements of groundwater levels, surface water levels, surface water flow will not provide a sufficient level of precision. Continuous monitoring using data loggers is recommended and should be submitted to the MNR (Guelph District).
- 10. The primary objectives of the requested site visit will be to verify wetland and creek boundaries on the subject property and to review setbacks from these features. The unevaluated 0.2 ha wetland situated along the creek corridor is located within 750 m of a portion of the Provincially Significant Eramosa River Blue Springs Creek Wetland Complex. Given the apparent hydrological connection, we suggest that the wetland complexing rules outlined in the Ontario Wetland Evaluation Manual be applied to this unevaluated wetland and that OMNR provide comment directly on this point.

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- 11. Page 2 of the Operations Plan currently provides for a 30 m setback from the southwest wetland but also suggests that a reduced 20 m setback may be established pending the outcome of archaeology review and clearance. The GRCA supports the 30 m setback illustrated on the plans. Rationale needs to be provided in writing to GRCA staff for a reduction in the 30 m setback and the areas examined in detail on-site.
- 12. The wetland boundary and development buffers confirmed by GRCA staff should be plotted on the Operational Plans.
- 13. With respect to response #95 & #96, we respectfully request a copy of the ELC data sheets as this would help support the ELC mapping information presented in the Level 2 report.
- 14. With respect to responses #97-99, the woodland on this site exceeds the County's size threshold for significance. Therefore, the GRCA recommends that this woodland be assessed for significance and any linkages with nearby woodlands in accordance with the County and Provincial guidance and be forward to the GRCA and County for review. County and GRCA to verify the limit of the significant woodland on the subject property in correlation with the Natural Environmental Report.
- 15. The limits of Significant Woodlands and development buffers confirmed by GRCA and County staff should be plotted on the Operational Plans.
- 16. The GRCA is satisfied with the response regarding the identification and protection of Significant Wildlife Habitat on this site but requests that the MNR be consulted regarding the potential presence of Little Brown Bat, which was recently listed as an Endangered species in Ontario and is currently afforded protection under the Endangered Species Act.
- 17. Generally, the GRCA is supportive of the progressive and final rehabilitation plans (Section 7.6) and supports the recommended wetland restoration and enhancement plans for the site. It is necessary to demonstrate that the alteration of an existing wetland could be consistent with the GRCA's Wetland Policy and demonstrated through an EIS addendum.
- 18. Proponent to provide culvert details of the proposed stream crossing for review by GRCA staff and details to be included on the site plan. The placement of the structure will result in the loss of stream habitat. This should be addressed in an addendum to the RIS.

The application fees are still outstanding. Invoice No. 2264 was forward to the applicant for a *Below the Water Table* Aggregate Act Application with features of interest within 120 metres of license limit, in conjunction with this Zoning By-law Amendment, being reviewed by GRCA staff.

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Please contact Heather Ireland at 519-621-2763 ext. 2320 to schedule a site visit between the County, GRCA staff, OMNR and the proponents.

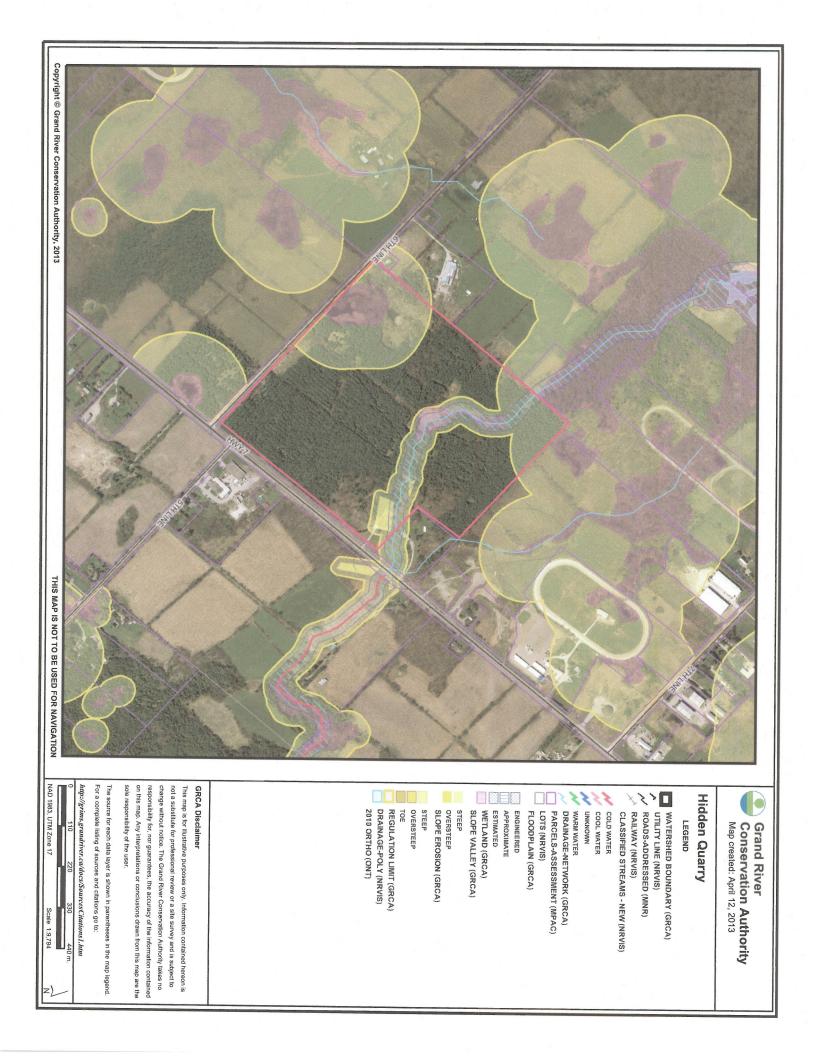
Yours truly,

A. Matsberg

Fred Natolochny MCIP RPP Supervisor of Resource Planning Grand River Conservation Authority FN/hi

 cc. Township of Guelph-Eramosa c/o Janice Sheppard County of Wellington c/o Aldo Salis Regional Municipality of Halton c/o Adam Huycke Burnside c/o Carley Dixon Cuesta Planning Consultants Inc. c/o Mike Davis – 978 First Avenue West, Owen Sound ON N4K 4K5 James Dick Construction c/o Greg Sweetnam & Leigh Mugford – Box 470 Bolton ON L7E 5T4

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Hidden Quarry Site Meeting Notes for June 7 @ 1:00 PM

In Attendance: GRCA-Fred Natolochny, Tony Zammit Wellington County- Peter Williams, Williams Forestry Services Township of Guelph Eramosa- Domenique Evans and Don McNaulty, RJ Burnside Ministry of Natural Resources- Steve May James Dick Construction Limited- Greg Sweetnam, Leigh Mugford Stan Denhoed, Harden Environmental Rob Stovel, Stovel Associates Greg Scheifele, GWS Ecological and Forestry Services

All in attendance by 1:15. Brief welcome and site orientation. Generally the site walk started at the on site contemporary home, proceeded to the west along the woodland border, crossed the creek and followed the woodland border to the east property limit. Then the group walked the east watercourse limit to the north property boundary, crossed the creek and proceeded down the west creek boundary to the central wetland. The wetland boundary was viewed and the group returned to their cars. The walk reconvened in the old gravel pit in the northwest corner of the site. The boundary of the MAS 2-1 wetland was walked and the location of the berms and hydraulic buffer was pointed out. Details of discussions of various features are listed below. All had left the site by 4:15 pm.

<u>The notes below were written by L Mugford James Dick Construction Ltd, with</u> <u>additional content below that from GRCA and Wellington County.</u>

- 1. <u>Woodland Boundary south east area-</u>Identify and flag the limits of the woodland areas to be retained and removed and review linkages with off property areas.
- The group was led around the flagged limits by GWS. Discussion regarding saving large mature maple as a seed source in the vicinity of HQ 1. This was agreed to by JDC subject to monitoring of the condition of the tree as it will likely naturally decline over the coming decade.
- JDC also agreed that where there was a steep slope down into the extraction area it would not make sense to disturb the vegetation on the existing westerly slope of FOM 2-2.
- 2. <u>Tributary B and MAM3-2 Wetland-</u>Identify the limit of Tributary B including the MAM3-2 wetland area, the associated floodplain, set back requirements (20m vs 30m) and whether the services of a geomorphologist are required for this task.

- The setbacks from the stream and wetlands were staked and viewed in the field. There appeared to be a general agreement that the setbacks were appropriately staked.
- GRCA advised that as long as the floodplain was within the setbacks the services of a geomorphologist were not required.
- The installation of silt fence to protect the creek should be located inside the extraction area rather than inside the setback zone. All areas on the setback side of the silt fence as well as a 2m buffer outside the silt fence designated as 'no touch' areas. Stovel to provide design cross section.

3. Clarify GRCA April 15 2013 comment #10 regarding the 'unevaluated' wetland (MAM3-2) and application of the complexing rules from the Ontario Wetland Evaluation Manual?

• MNR written comments indicated that "Given that the MAM3-2 wetland is less than 0.5 Ha and in accordance with the OWEM and MNR policy the MNR has commented that this wetland feature will not be considered part of the Eramosa River- Blue Springs Creek PSW."

4. Identify whether the cedar stand (FOC2-2) beside Tributary B can be trimmed to a 20m setback.

- After review in the field with GRCA and the Professional Forester hired by Wellington County, no objections were raised regarding the staking locations as laid out in the field.
- 5. Discuss Tributary B crossing requirements.
- Discussion with the GRCA explored the use of a CSP type crossing with footing on either side, leaving the stream bed intact, constructed in the dry period. JDC will provide a design detail. GRCA advised to leave a low area on one side of the culvert in case of flooding or culvert blockage and install a steel or stone wing wall to protect the creek from erosion.
- 6. Burnside comment regarding the thickness of basal silt till near Tributary B and the effective "k" values that will affect where the water from Tributary B is going.
- Discussion with Stan Denhoed clarified evidence of basal silt layer in borehole logs on a monitor by monitor basis as each monitor was passed during the site walk.
- 7. <u>PSW and Other Wetlands- North West Area</u>-Flag, stake the limits of the PSW (MAS2-1).

- The boundary of the wetland was flagged and walked by GRCA and GWS and general consensus was reached.
- 8. Identify the adjacent wetland boundaries to be enhanced and removed (0.2Ha of the man-made wetland area is proposed to be removed) and the proposed enhancement proposal in relation to meeting GRCA Wetlands Policy.
- Discussion around the merits of the enhancement versus leaving the wetland in its current condition resulted in agreement to preserve the wetland enhancement part of the project and preserve the man-made current condition with small area of the manmade wetland to be removed.
- 9. Review the proposed location for the Hydraulic Barrier proposal as there may be a mapping issue. Also may discuss the need for the Barrier as an optional belt and suspenders approach. Is there groundwater flow out of the wetland etc.
- JDC agrees that the hydraulic buffer would be relocated slightly to underlie the acoustic berm in order to minimize the overall disturbance of vegetation and wetland.

Feedback to Notes from GRCA 7/15/2013 Fred Natolochny:

Thank you for providing the minutes from our site meeting for the Hidden Quarry. I hope you wouldn't mind distributing the comments below as appropriate/required.

We have reviewed the minutes and Tony Zammit has identified a couple of points where modification of the minutes may be warranted.

Point #1 - GRCA is satisfied with the boundary along the ridgeline, but in other areas the line seemed arbitrary. This was conveyed to GWS. Furthermore, I do not recall that we reviewed or discussed linkages with off-site property areas.

Point #2 - Agreement/approval of setbacks was not an objective of the site visit. A buffer analysis is required prior to approval of extraction limits.

Point #7 - Although mapped by GWS in his Level 2 Natural Environment Report, the boundary of the man-made wetland was not staked in the field and thus was not verified by the GRCA, this should be noted.

The intent of the on-site inspection was to become familiar with the features and to review the staking/limits of the features and proposed limits in the field. We would expect that rational for the woodland area and review of linkage to offsite areas would be provided in a written response. The buffer analysis should be provided in response to our prior comments and the in-field findings.

Trusting these comments are helpful, and looking forward to a response to our prior comments when they are available.

Feedback from Wellington County – July 18, 2013 from Aldo Salis

Please find attached the comments provided by our consultant, Peter Williams, Williams & Associates Forestry Consultants Ltd., regarding the proposed Hidden Quarry application.

Williams & Associates was retained by this office to assist with the review of the woodlands on the subject property. As you know, Mr. Williams attended the site meeting on June 7, 2013 together with representatives from the municipality and the other public agencies. While Mr. Williams was generally in agreement with the results of the woodlands assessment, he did request additional information. If you have any questions with this request or the attached report, please contact me.





Website <u>www.forestar.ca</u> Email <u>forstar@execulink.com</u>

June 13, 2013

Aldo Salis, Planner Wellington County, Planning and Development Department, 74 Woolwich St. Guelph, Ont N1H 3T9

Re: Hidden Quarry (Rockwood) Site Meeting, June 7

At the County's request, I reviewed the documentation sent and other materials regarding the Hidden Quarry proposal near Rockwood and attended a site meeting. The material was mainly technical reports from the proponents and material in my files regarding forests and natural areas in the vicinity.

On June 7, 2013, I attended a site meeting and tour hosted by the proponent and their consulting team. Representatives from the Grand River Conservation Authority and Ministry of Natural Resources were also in attendance. My understanding is that the County wanted my presence at the site meeting to review/confirm that the woodland boundaries were satisfactorily represented in the proponent's assessment and to report on other aspects of the woodland evaluation conducted by the proponent.

I reviewed the technical reports regarding the vegetation and wildlife on the site and found that the survey and inventory work was professionally done and represents the existing conditions of the subject property. While not all of the woodlands on the property are currently mapped as Core Greenlands or Greenlands in the County Official Plan, in my opinion the woodlands appear to meet the size requirements of the Official Plan policies, contribute to local forest cover, provide linkage to neighbouring woodlands, and provide important ecological connection to the nearby natural areas (i.e. Eramosa/ Blue Springs Creek corridors).

In my view, the technical reports provide inadequate discussion as to the importance of the woodlands on the property relative to nearby natural areas, and incorrectly suggested negligible linkages to the Blue Springs Creek to the south. They justify the lack of connectivity because the property is cut off by Highway 7, and limited linkages to other woodlands to the north and west. I disagree with this assessment and suggest that with the exception of the proximity of urban areas associated with Rockwood, the complex of natural areas and agricultural land is well-connected. The natural areas between the Eramosa River and Blue Springs Creek channels become more important closer to their confluence around Rockwood and Eden Mills. With the high proportion of natural areas between the subject property and the confluence of two waterways, I believe that the woodlands on the subject property provide important connectivity to surrounding natural areas.

Notwithstanding the preceding discussion, it is my opinion that the proposed project would have limited negative impacts on the functions discussed above. While these woodland functions would be temporarily affected by the project, I believe that the basic linkages can be maintained by the vegetative corridors on the north and east side of the property and stream channel as proposed. The affects on connectivity can be further mitigated through other operational considerations such as retaining the current vegetation until just prior to extraction, expeditious restoration back to natural cover and enhancing tree/natural vegetation along the 6^{th} Line would help maintain these connections.

I trust that this information is helpful. Please contact me if you have any questions.

Sincerely,

Ret William

Peter A. Williams, M.Sc., R.P.F. Consulting Forester/Arborist





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

Our File: 9506

September 9, 2013

James Dick Construction Ltd. Box 470 Bolton, Ontario, L7E 5T4

Attention: Mr. Greg Sweetnam Vice President – Resources

Dear Mr. Sweetnam:

Re: Flooding Issues within Buffer around Tributary B – Hidden Quarry

We are pleased to provide an analysis of historical flood levels in Tributary B at the Hidden Quarry. We have been monitoring the surface water levels in Tributary B since 1998 and therefore have a reasonably long record of the naturally occurring water levels. In addition, tenants at the site have periodically dammed the tributary resulting in unnaturally high water levels. Nonetheless, we have used the highest recorded water levels in the tributary for this analysis.

The values used in this analysis are as follows;

Station	High Water Level (m AMSL)	Date
SW4	359.37	April 2008
SW5	356.37	April 2001
SW7	356.2	April 2008

Elevations along the 20 metre and 30 metre buffer along Tributary B were determined from the 1 m contour data set available from the Grand River Conservation Authority and spot elevations determined by Harden Environmental Services Ltd.

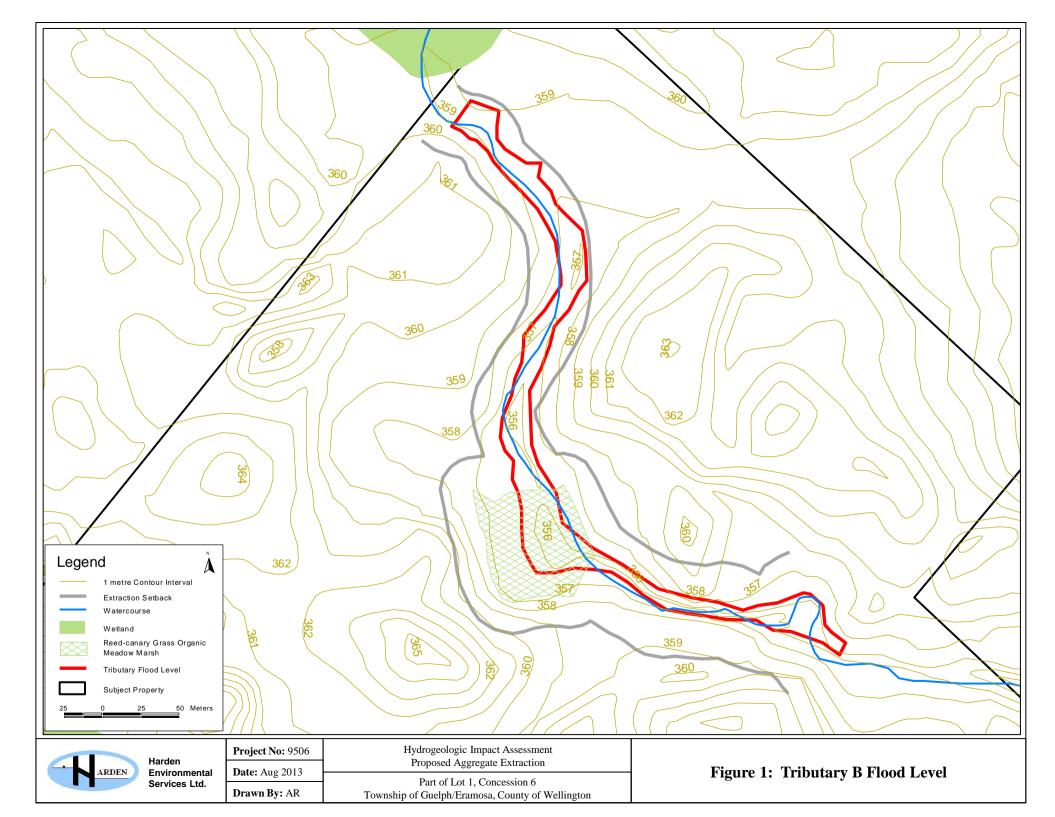
Comparing flood levels in Tributary B to ground elevations results in the flooding of areas shown on Figure 1. It can be seen that when at historical flood levels, Tributary B will remain confined within the proposed buffer. This analysis was done by comparing kriged ground elevation data and kriged surface water level data within the Viewlog[™] geospatial data analytical software package.

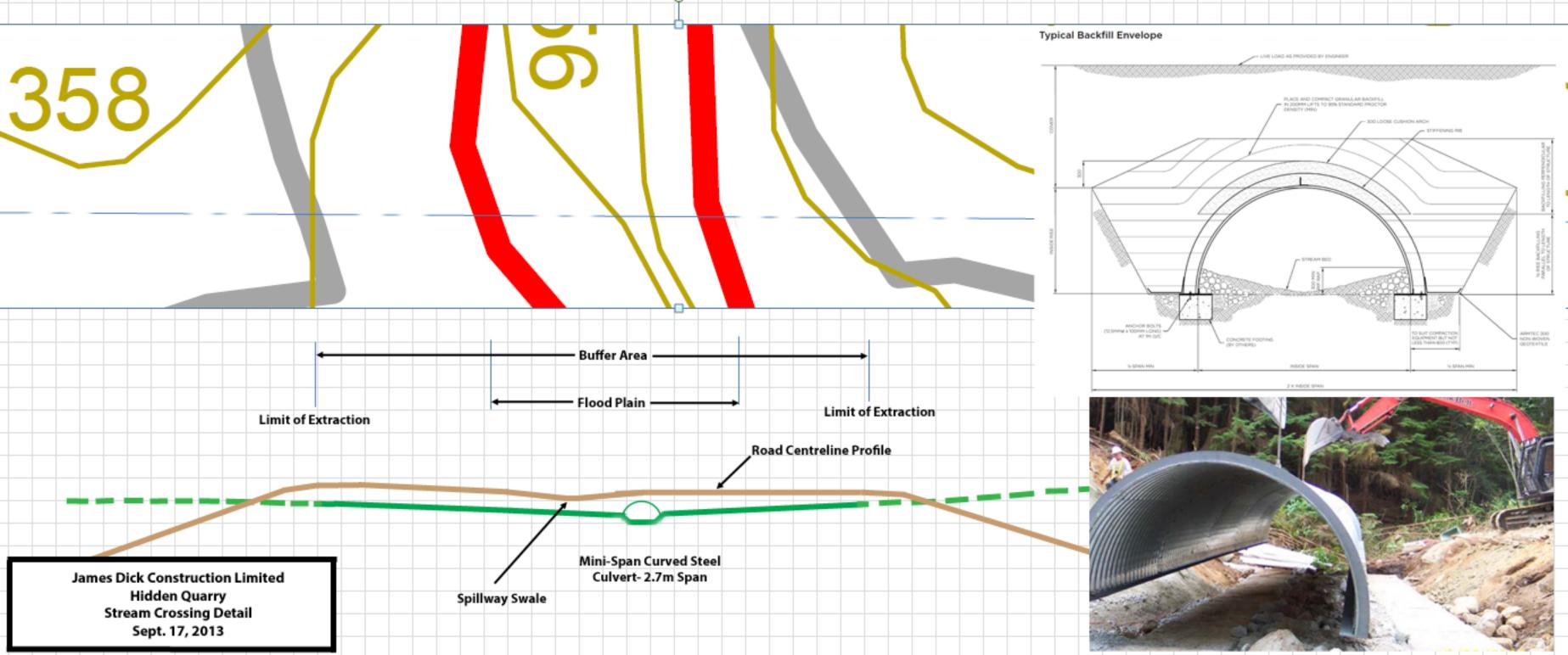
September 9, 2013 Page 2

Sincerely,

Harden Environmental Services Ltd.

Stan Denhoed, M.Sc., P.Eng. Senior Hydrogeologist







File: 3028 By: Email & Mail

September 17, 2013

Grand River Conservation Authority 400 Clyde Road P.O. Box 729 Cambridge, Ontario N1R 5W6

Attention: Mr. Fred Natolochny, MCIP, RPP Supervisor of Resource Planning

Dear: Mr. Natolochny

Re: Hidden Quarry Site Meeting Notes

We have reviewed your July 15, 2013 comments on the June 7th Site Meeting Notes and offer the following explanations to the concerns raised by your staff. At this time we will also respond to any outstanding GRCA comments that we feel have not been fully addressed in previous correspondence. Our responses are consistent with the numbering sequence used in the Meeting Notes.

Point #1 – The boundary of the woodland area to be retained in the southeast corner of the site was based on the maturity of forest stands, terrain considerations and a blasting setback of 165m from the existing off-site residences, particularly the house located northeast of FOM2-2 and southeast of FOD5-7. As indicated at our site meeting, this boundary was shifted further westward to the base of the steep slope that forms the most westerly limit of FOM2-2. It was also agreed to shift the boundary in FOD5-7 further northward to protect a mature sugar maple tree, assuming the tree remains reasonably healthy at the time when tree clearing commences in Phase 2. In any event, virtually all of the mature mixedwood and deciduous forest stands (FOM 2-2 and FOD 5-7) will be retained, as well as most of the mature upland cedar stand (FOC 2-2) and portions of the conifer plantation CUP3-12a and CUP3-12d. The cedar stand is mostly being retained due to the 165m setback required from the off-site residence and the 20 to 30m setbacks recommended from the stream.

With respect to linkages to off-site natural areas, this issue was not discussed at our meeting but it was raised by Peter Williams on behalf of the County. We have attached our response to Mr. Williams concerns for your review.

Point #2 - We understand that agreement/approval of proposed setbacks was not an objective of the site visit from your perspective. Rationale supporting the recommended setbacks from Tributary B and Wetland MAM3-2 was previously provided by GWS and Harden Environmental as shown in #93 of the Comment Matrix assembled by James Dick Construction (JDC). In addition, Stan Denhoed has confirmed that over the past 15

years flooding in the stream valley would not exceed the proposed setback elevations as discussed in his September 9, 2013 correspondence (attached). It is therefore concluded that flood waters will always be confined to the area within the residual stream valley. If you still have concerns with these setbacks please clarify your position with specific details so we may better understand the concern.

Point #7&8 – The boundaries of the man-made wetland MAM2-5 and SWT2-2 within the former wayside pit were not staked or flagged in advance of the site meeting because 0.2 ha of this wetland is proposed for removal to accommodate quarry development while the balance of the area is proposed for enlargement and deepening, particularly in the area now occupied by a gravel stockpile that is to be removed. Since the boundaries of the residual wetland will change when the gravel stockpile is removed there was little merit in trying to precisely identify the future wetland area. Furthermore, this area will be within the protected zone as shown on the Operations and Rehabilitation Plans. In any event, GRCA staff concluded there was no need to enhance the wetland area which they felt should simply be maintained in its current condition. JDC agreed not to carry out any wetland enhancement work other than the removal of the gravel stockpile.

We trust the above information adequately addresses the comments received to date.

Yours truly,

GWS Ecological & Forestry Services Inc.

Greg W. Scheifele, M. A., R.P.F. Principal Ecologist/Forester

cc: Greg Sweetnam, James Dick Construction Limited Leigh Mugford, James Dick Construction Limited

Leigh Mugford

From:	Jason Wagler <jwagler@grandriver.ca> November-06-13 4:46 PM</jwagler@grandriver.ca>
10:	jsheppard@get.on.ca; jason.mclay@ontario.ca
Cc:	aldos@wellington.ca; Leigh Mugford; Greg Sweetnam; adam.huycke@halton.ca; mike@cuestaplanning.com; carley.dixon@rjburnside.com
Subject: Attachments:	Hidden Quarry - GRCA Comments Hidden Quarry - GRCA Comments Nov 4, 2013.pdf

Hi Janice and Jason:

Attached are GRCA's comments for the Hidden Quarry applications based on the submission of revised materials. Please let me know if you have any questions. Thank you.

Jason

Jason Wagler, MCIP, RPP Resource Planner Grand River Conservation Authority 400 Clyde Rd, Cambridge ON N1R 5W6 (519) 621-2763 x2320 www.grandriver.ca







400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

November 4, 2013

Ms. Janice Sheppard Township of Guelph/Eramosa 8348 Wellington Road 124 P.O Box 124 Rockwood, ON N0B 2K0 Mr. Jason McLay Ministry of Natural Resources 1 Stone Road West Guelph, ON N1G 4Y2

Dear Ms. Sheppard & Mr. McLay:

 Review of Revised Materials and Response to GRCA Site Meeting Comments Proposed Hidden Quarry - 634745 Ontario Limited (James Dick Construction) Class A, Category 2 Pit and Quarry License Application and Zoning By-law Amendment Application ZBA 09/12 (Hidden Quarry) Lot 1, Concession 6, Former Township of Eramosa 8352 Highway 7, Township of Guelph/Eramosa

Grand River Conservation Authority staff has reviewed the following revised materials and/or supplementary materials provided in support of the proposed Hidden Quarry:

- Hidden Quarry Site Meeting Notes Response to July 15, 2013 GRCA Site Meeting Comments, prepared by GWS, dated September 17, 2013
- Hidden Quarry Response to County Comments, prepared by GWS, dated September 6, 2013
- Flooding Issues within Buffer around Tributary B Hidden Quarry, prepared by Harden Environmental Services Ltd., dated September 9, 2013
- Stream Crossing Detail, prepared by James Dick Construction Ltd., received October 10, 2013
- Hydrogeological Summary Report for the Township of Guelph Eramosa, prepared by Harden Environmental Services Ltd., dated September 5, 2013
- Cumulative Effects Assessment Issues, prepared by Harden Environmental Services Ltd., dated March 13, 2013
- Summary of Drilling and Testing of M15 at Hidden Quarry Site, prepared by Harden Environmental Services Ltd., dated June 7, 2013
- Response to MOE Comments Hidden Quarry, prepared by Harden Environmental Services Ltd., dated July 15, 2013
- Revised Operational Plans and Progressive Rehabilitation Plan, prepared by Stovel & Associates, dated October 23, 2013

Based on our review of the above listed materials, GRCA staff recommends that the subject applications are deferred until the following comments are addressed:

1. A key conclusion of the hydrogeology assessment is that "there will be no off-site impact to any wetland, water well, spring or stream from the active removal of rock beneath the water table." It is further noted that the proposed revised location of the hydraulic barrier will not lessen its

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effectiveness. GRCA staff note that the assessment of potential hydrologic impacts has focused on groundwater contributions to wetlands and tributaries on and off the subject property. It is our understanding that a portion of the wetland surface catchment will be removed during extraction. The impact of a reduced surface catchment area on surface water flow toward the riparian wetland and intermittent watercourse needs to be assessed. Please assess whether the 20 to 30 m setback is sufficient to maintain surface flows to the riparian wetland and creek.

Also, the revised location of the hydraulic barrier should be illustrated in a cross section through the PSW and smaller, man-made wetland since the latter is expected to undergo some changes as a result of the construction of the hydraulic barrier. The proposed changes to the man-made wetland should be noted on Drawings 4 and 5.

2. The proposed monitoring plan for surface water bodies (i.e., wetlands and intermittent creek) lacks detail. It is generally recommended that wetland hydrology be monitored continuously and concurrently using data loggers and that the sampling frequency be increased in order to be able to detect seasonal variations in surface water levels, Nitrate concentration, temperature, pH, and dissolved oxygen, and conductivity.

We recognize that there will be continuous monitoring of the bedrock aquifer. Under bullet 2 of Section 3.0 - Contingency Measures within the revised monitoring plan there is no mention of a time frame for evaluating data to determine whether quarry impacts are responsible for changes to water levels/quality. It would be useful to state a suitable time frame for data review.

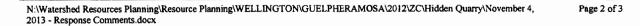
Section 3.1 of the revised monitoring plan states that manual measurements will be taken on a monthly basis for most of the monitors; consideration is warranted as to whether this is frequent enough given the susceptibility of groundwater levels to more significant fluctuations in the initial extraction phase. Daily measurements may be more appropriate prior to extraction and during the initial extraction phases.

3. Seasonal trigger levels should be established for the Northwest Wetland. GRCA staff had indicated previously that additional monitors were necessary in order to understand and assess impacts on other portions of the Provincially Significant Wetland. Therefore, trigger levels should be established for the Northeast Wetland and the Allen Wetland as well. Contingency measures should also be established and tied to the trigger levels.

With regard to the trigger levels for the bedrock aquifer, it would be useful to establish the warning level such that there is sufficient time to invoke contingency measures if the trigger level is exceeded.

Section 3.1 of the revised monitoring plan states "If any trigger level is breached..." This should clarify the warning level or trigger level as stated in Table 1.

4. All wetlands verified by the GRCA and extraction setbacks from these features should be plotted and clearly labelled on all site plans.



- 5. Drawing 4 (Progressive and Final Rehabilitation Plans) includes the following wording under the section "Created Wetlands": "The site plans illustrate areas on the property where wetlands can be created." We recommend a slight revision to the wording to ensure that wetlands "will be created".
- 6. Vegetation species that area considered appropriate for the created wetland communities are not currently listed on the site plan. Please revise the site plan to include species appropriate for the wetland communities.
- 7. GRCA comment #90 from the comment matrix previously provided by Cuesta Planning Consultants Inc. in March 2013 has been addressed by the proponent proposing to install 2 additional groundwater monitoring wells. During a recent site visit, Harden Environmental Services Ltd. indicated that only 1 monitor had been installed. The Revised Monitoring Plan indicates that two monitors had been installed: M15 and M16; however this is contradictory to the site visit and should be clarified.
- 8. From review of the Revised Monitoring Plan, the well that was installed (M15) appears to be located within the extraction footprint of the West Pond. It would be useful to clarify this location.
- 9. As requested by GRCA staff, a basic cumulative effects assessment has been submitted by the proponent, which has addressed the potential for cumulative effects from the proposed quarry.

Fees

We wish to acknowledge that the GRCA application review fees for a *Below the Water Table* Aggregate Act Application with features of interest within 120 metres of license limit were paid on July 25, 2013.

Please contact Jason Wagler at 519-621-2763 ext. 2320 if you have any questions or require clarification of the above.

Yours truly,

AMatter y

Fred Natolochny MCIP RPP Supervisor of Resource Planning Grand River Conservation Authority FN/jw

 cc. Township of Guelph-Eramosa c/o Janice Sheppard County of Wellington c/o Aldo Salis Regional Municipality of Halton c/o Adam Huycke Burnside c/o Carley Dixon Cuesta Planning Consultants Inc. c/o Mike Davis – 978 First Avenue West, Owen Sound ON N4K 4K5 James Dick Construction c/o Greg Sweetnam & Leigh Mugford – Box 470 Bolton ON L7E 5T4

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Page 3 of 3

Member of Conservation Ontario, representing Ontario's 36 Conservation Authorities - - The Grand - A Canadian Heritage River



Harden Environmental Services Ltd. 4622 Nassagaweya-Puslinch Townline Road 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

Our File: 9506

November 26, 2013

Grand River Conservation Authority 400 Clyde Road PO Box 729 Cambridge ON N1R 5W6

Attention: Fred Natalochny Supervisor of Resource Planning

Dear Mr. Natalochny:

Re: Review of Revised Materials and Response to Site Meeting Guelph-Eramosa File ZBA09/2012

This letter concerns the eight comments from the GRCA as addressed by Harden Environmental Services, Stovel and Associates or GWS Ecological and Forestry Services.

We are pleased to provide a response to the comments as follows;

GRCA Comment 1a

a) A key conclusion of the hydrogeology assessment is that "there will be no off-site impact to any wetland, water well, spring or stream from the active removal of rock beneath the water table." It is further noted that the proposed revised location of the hydraulic barrier will not lessen its effectiveness. GRCA staff note that the assessment of potential hydrologic impacts has focused on groundwater contributions to wetlands and tributaries on and off the subject property. It is our understanding that a portion of the wetland surface catchment will be removed during extraction. The impact of a reduced surface catchment area on surface water flow toward the riparian wetland and intermittent watercourse needs to be assessed.

Harden Response to Comment 1a

Riparian Wetland

The riparian wetland adjacent to Tributary B presently has a catchment area that includes a portion of the proposed excavation area. Thus, if



approved, the quarry will decrease the size of the surface water catchment area of the riparian wetland. Groundwater monitoring confirms that there is no groundwater contribution from the proposed quarry to the riparian wetland, thus the only potential hydrological impact that can arise is through the reduction of the surface water catchment area.

The present day surface water catchment area of the riparian wetland is shown on Figure 1. The catchment area is $570,917 \text{ m}^2$. The potential reduction in surface water catchment area from the proposed quarry is $19,095 \text{ m}^2$. The reduction in area represents 3.3% of the total catchment area of the riparian wetland. It is our opinion that this reduction is insignificant relative to the remaining contributing area. In addition, annual variability in precipitation rate is much greater than 3.3% and therefore the wetland is already accustomed to significant variability in support hydrology. Also, we have been on the site over one hundred and fifty times since 1995 and other than possibly in the spring, we have not observed overland flow from the upland forest into the wetland. This is due to the relatively low slope, heavy tree cover and relatively high permeability of surficial soils.

Tributary B (Intermittent Stream)

The total catchment area of Tributary B upstream from the southern edge of the proposed quarry is $585,156 \text{ m}^2$ (Figure 2). The catchment area reduction of $19,095 \text{ m}^2$ represents 3.3 percent of the total catchment area and will not significantly affect the hydrological function of the stream.

GRCA Comment 1b

b) Please assess whether the 20 to 30 m setback is sufficient to maintain surface flows to the riparian wetland and creek.

Harden Response to Comment 1b

Based on the analysis that there will be a maximum loss of 3.3% of the surface water catchment area of the riparian wetland and stream, the proposed buffer varying from 20 to 30 metres in width along Tributary B is adequate to safeguard the hydrological functions of the stream and the wetland.

There is no groundwater discharge component of support hydrology for either the wetland or the stream, therefore, the 20/30 metre setback will not affect groundwater support for the wetland or stream. In addition to the 20/30 metre setback, there will be a 2:1 slope in the excavation providing an additional 40 to 60 metres separation between below-water-table extraction and the riparian wetland or the stream. Our observations of groundwater conditions along the stream (M3 and M11) clearly show that there is no



groundwater above the bedrock and therefore hydrologic conditions in the wetland or the stream cannot be affected.

GRCA Comment 1c

c) Also, the revised location of the hydraulic barrier should be illustrated in a cross section through the PSW and smaller, man-made wetland since the latter is expected to undergo some changes as a result of the construction of the hydraulic barrier. The proposed changes to the man-made wetland should be noted on Drawings 4 and 5.

Stovel and Associates Response to Comment 1c

A cross-section through the PSW and smaller man-made wetland has been prepared and attached to this submission. The proposed changes to the man-made wetland are noted on revised site plan Drawings 4 and 5 also attached.

GRCA Comment 2a

a) The proposed monitoring plan for surface water bodies (i.e., wetlands and intermittent creek) lacks detail. It is generally recommended that wetland hydrology be monitored continuously and concurrently using data loggers and that the sampling frequency be increased in order to be able to detect seasonal variations in surface water levels, Nitrate concentration, temperature, pH, and dissolved oxygen, and conductivity.

Harden Response to Comment 2a

Note: A revised monitoring program is provided in Appendix A.

Monitoring of the Northwest Wetland

As suggested by the GRCA, JDCL has agreed to continuous water level monitoring in the Northwest Wetland. A data logger will be installed at SW6 within the wetland to measure and record the surface water level of the open water portion of the wetland. Water levels will be recorded every four hours. We feel that measurements at SW6 are appropriate because in the eighteen years of monitoring this site, other than a two month period in 2007, there has always been a small open water area within the wetland at station SW6. Monthly water level monitoring has already been recommended and included in the monitoring plan for all eight mini piezometers located within and adjacent to the wetland. This will provide sufficient data to observe seasonal variations and detect potential anthropogenic influences on water levels.

The chemical water quality of the Northwest Wetland will be determined on an annual basis for nitrate, pH, dissolved oxygen, temperature and conductivity. There is little risk





of chemical change in the wetland as there will be no quarrying activity within the catchment area of the wetland. Initially there will be berm construction at the edge of the catchment area, however this activity is unlikely to affect the chemical quality of the wetland water as the source area is mainly northwest of the site. Once construction activities have ceased, it is our opinion that provided that water levels do not change, the water quality will not change. We therefore recommend that the water quality testing be limited to the first three years following the approval of the quarry or to the completion of construction activities within the wetland catchment area whichever is the longer. The water quality samples will be obtained in September when water levels are lowest in the wetland.

Monitoring of Tributary B

The flow in Tributary B is almost entirely (97%) from upgradient sources. Harden has recommended monthly streamflow monitoring and water level monitoring in Tributary B. In addition, based on comments made by the GRCA, James Dick Construction Ltd. will install continuous water level monitoring devices in Tributary B at the northern and southern property boundary. These will be located at the SW4 and SW8 locations as shown on Figure 3. Water levels will be obtained every four hours as well as temperature.

Water quality testing in Tributary B has not been recommended as quarry activities will remain outside of the catchment area of the stream.

Monitoring of the Allen Wetland

The Allen Wetland receives no support hydrology from the proposed quarry site. As seen on Figure 1, the upgradient watershed is quite large. We have observed significant flow originating on the De Grandis farm entering the wetland and Tributary B loses water throughout the southern two thirds of the wetland. The lands within and around the wetland have formerly been drained to facilitate farming, indicative of surface water drainage issues (i.e. poor drainage with water retention at the ground surface). The soils we tested beneath the wetland are a silty till resulting in the poor drainage. Based on our observations, the wetland is supported from surface water inflow from the north, shallow overburden groundwater flowing into the wetland along the northern wetland boundary and direct precipitation. The wetland is not supported by groundwater from the bedrock or groundwater from south of the wetland.

With respect to potential groundwater contributions, we have attached Figure 3.20 from our original December 2012 report. This is a cross section through the Allen Wetland (location shown on Figure 2). It can be seen that it is not possible for groundwater to contribute to the wetland given the superior elevation of the wetland compared to low ground elevations to the east and west. Ground elevations to the south also decrease. In addition, the nearest groundwater monitors being M2 (bedrock) and TP8 (overburden) on



the Hidden Quarry site have groundwater elevations of approximately 352 and 354 m AMSL respectively. The wetland elevation is approximately 360 m AMSL. This six to eight metre difference clearly shows that the wetland is not groundwater dependent.

It is our opinion that the bedrock groundwater levels are not associated with the hydroperiod of the wetland. Figure 5 shows the date that Tributary B was first observed to be dry (on an annual basis) compared to the bedrock groundwater level on that date as observed in groundwater monitor M2. If bedrock groundwater levels were a significant influence on wetland conditions, one would find that the creek would dry up when groundwater was below a certain elevation. Figure 5 shows that Tributary B becomes dry over a wide range of bedrock ground water levels, suggesting other factors determine streamflow (e.g. antecedent rainfall, storage in the De Grandis ponds).

The technical justifications for why the Allen Wetland is not dependent on groundwater from the site are;

- 1) The site is downgradient and there is a four to six meter elevation difference between groundwater levels along the northern site boundary and the elevation of the Allen Wetland.
- 2) The Allen Wetland has an elevation superior to elevations found east, west and south, therefore only groundwater from the north can potentially contribute to the wetland. The proposed quarry is to the south.
- 3) There is no correlation between the date of Tributary B becoming dry and bedrock groundwater levels. This indicates that other factors determine flow in Tributary B and by association, the hydro period of the Allen Wetland.

Therefore, monitoring groundwater levels directly beneath the Allen Wetland will not necessarily be indicative of the saturation conditions at the ground surface that create the wetland environment. It is our opinion that the passage of surface water through the wetland is a better measure of surface water conditions in the wetland.

Therefore, we recommend improving streamflow measurements of Tributary B at the north end of the proposed Hidden Quarry site. This is coincident with the southern edge of the Allen Wetland.

We recommend installing a weir in Tributary B along with a continuous water level recording device. The weir will be installed at location SW4 on Figure 3. A rating curve for the weir will be developed and outflow from the Allen Wetland will be determined accurately. The flow volume and observed groundwater conditions at M2 as an indication of whether or not groundwater levels have changed will be used to determine if surface water level changes in the wetland have occurred as a result of quarry activities.



In regards to a threshold value for the streamflow measurements, the earliest historical observed date of Tributary B being dry at the southern edge of the Allen Wetland in a given year is June 22. Other observed dates of flow cessation are July 6, August 15, August 29, August 31, September 17 and October 5. There has also been at least one year in which flow did not cease in Tributary B. We suggest using the cessation of flow by June 22 as a trigger mechanism to invoke contingency measures.

We also suggest that a warning flow rate of less than 25 L/s in the month of May be used to initiate the evaluation of causes of the low flow occurrence prior to the threshold level being breached. Based on past experience, this will provide approximately 30 days of review before the threshold value is breached.

Monitoring of the Northeast Wetland

A review of surface water levels in the Northeast Wetland (SW14) and groundwater levels in groundwater monitor TP8 located 25 metres away show that there is approximately four metres of elevation difference. This proves that the Northeast Wetland is not associated with the water table and is a perched wetland. The catchment area of the Northeast Wetland within the JDCL property boundary has been determined and is shown as D3 on the attached Figure 3.4 of the Harden 2012 report. The entire catchment area of the Northeast Wetland is outside of the proposed extraction area and will not be affected. Therefore, it is our opinion that monitoring of the Northeast Wetland is not warranted with continuous monitoring or to have associated warning and trigger levels. JDCL has agreed to monitoring the water level at station SW14, located in the Northeast Wetland, at the same frequency as groundwater levels which are monthly between April and November and once in February.

GRCA Comment 2b

b) We recognize that there will be continuous monitoring of the bedrock aquifer. Under bullet 2 of Section 3.0 - Contingency Measures within the revised monitoring plan there is no mention of a time frame for evaluating data to determine whether quarry impacts are responsible for changes to water levels/quality. It would be useful to state a suitable time frame for data review.

Harden Response to Comment 2b

We recommend a seven day period to evaluate the data and follow up with agencies.

GRCA Comment 2c

c) Section 3.1 of the revised monitoring plan states that manual measurements will be taken on a monthly basis for most of the monitors; consideration is warranted as to whether this is frequent enough given the susceptibility of groundwater levels to more significant



fluctuations in the initial extraction phase. Daily measurements may be more appropriate prior to extraction and during the initial extraction phases.

Harden Response to Comment 2c

The monitoring program presently states the following:

Automatic Daily Measurement in M1D, M2, M3, M4, M15, M16 for year prior to and year following bedrock extraction with re-evaluation of monitoring frequency after 1st year of bedrock extraction.

We have also recommended weekly water levels for the first three months of belowwater-table extraction for the monitoring wells nearest to the initial sinking cut. However, we agree that daily water level observations are appropriate and propose to add a staff gauge in the sinking cut that will be monitored on a daily basis with surrounding groundwater levels monitored weekly. This visual aid will be installed such that the operator can monitor the water level in the sinking cut as it is being excavated and a benchmark will clearly show the minimum allowable water level. JDCL has committed to a maximum water level change of 2.54 metres in the sinking cut.

GRCA Comment 3a

a) Seasonal trigger levels should be established for the Northwest Wetland. GRCA staff had indicated previously that additional monitors were necessary in order to understand and assess impacts on other portions of the Provincially Significant Wetland. Therefore, trigger levels should be established for the Northeast Wetland and the Allen Wetland as well. Contingency measures should also be established and tied to the trigger levels.

Harden Response to Comment 3a

We have attached a hydrograph with proposed seasonal trigger levels (Figure 7) for the Northwest Wetland. We are recommending three trigger levels, winter, spring and summer/fall. The trigger levels have been assigned as follows;

Winter Trigger Level - lowest water level observed between December 1 and March 1 Spring Trigger Level - lowest water level observed between March 2 and June 15 Summer/Fall Trigger Level - lowest water level observed between June 16 and November 30.

The trigger levels and warning levels for the Northwest Wetland have been established based on historical monitoring. These values are summarized in Table 2 of the monitoring program as copied below.



	Table 2. Trigger Levels for the Surface Water Features						
Station	Winter		Spring		Fall		
	Warning	Trigger	Warning	Trigger	Warning	Trigger	
Northwest	354.35	354.20	354.48	354.33	354.38	354.23	
Wetland							
(SW6)							
Allen Wetland	The warning level will be a flow rate of less than 25 L/s occurring						
(SW4)	in May and the trigger level will be cessation of flow prior to June						
	22.						

Table 2:	Trigger l	Levels for	the Surface	Water Features
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The warning level has been established as 0.15 m above the trigger level and represents at least a two week period of time before the trigger level will be reached.

In regards to trigger values for the Northeast Wetland, please see Harden Response to Comment 2a.

GRCA Comment 3b

b) With regard to the trigger levels for the bedrock aquifer, it would be useful to establish the warning level such that there is sufficient time to invoke contingency measures if the trigger level is exceeded.

Harden Response to Comment 3b

We agree that there should be sufficient time between the warning level and trigger level. Under proposed warning and trigger levels, the time between warning level and trigger level is at least four weeks.

GRCA Comment 3c

c) Section 3.1 of the revised monitoring plan states "If any trigger level is breached ..." This should clarify the warning level or trigger level as stated in Table 1.

Harden Response to Comment 3c

Section 3.1 is referring to the trigger level. In the event that a warning level is breached there is a period of increased frequency of monitoring.



GRCA Comment 4

All wetlands verified by the GRCA and extraction setbacks from these features should be plotted and clearly labelled on all site plans.

Stovel and Associates Response to Comment 4

The requested wetlands and setbacks have been plotted and labelled on the attached revised site plans.

GRCA Comment 5

Drawing 4 (Progressive and Final Rehabilitation Plan) includes the following wording under the section "Created Wetlands": "The site plans illustrate areas on the property where wetlands can be created." We recommend a slight revision to the wording to ensure that wetlands "will be created".

Stovel and Associates Response to Comment 5

The requested wording change has been made to Drawing 4. The revised site plan is attached.

GRCA Comment 6

Vegetation species that area considered appropriate for the created wetland communities are not currently listed on the site plan. Please revise the site plan to include species appropriate for the wetland communities.

Stovel and Associates and GWS Ecological and Forestry response to Comment 6

The site plan has been revised to include species appropriate list. The revised site plan is attached.

GRCA Comment 7

GRCA comment #90 from the comment matrix previously provided by Cuesta Planning Consultants Inc. in March 2013 has been addressed by the proponent proposing to install 2 additional groundwater monitoring wells. During a recent site visit, Harden Environmental Services Ltd. indicated that only 1 monitor had been installed. The Revised Monitoring Plan indicates that two monitors had been installed: M15 and M16; however this is contradictory to the site visit and should be clarified.



Harden Response to Comment 7

James Dick Construction Ltd. has committed to the installation of two long term groundwater quality monitoring wells as recommended by the GRCA. M15 has been installed and was also used to address issues raised by the MOE and the consultants for the Township of Guelph Eramosa. M16 will be installed in the location shown on Figure 3 as a condition of the license approval.

GRCA Comment 8

From review of the Revised Monitoring Plan, the well that was installed (M15) appears to be located within the extraction footprint of the West Pond. It would be useful to clarify this location.

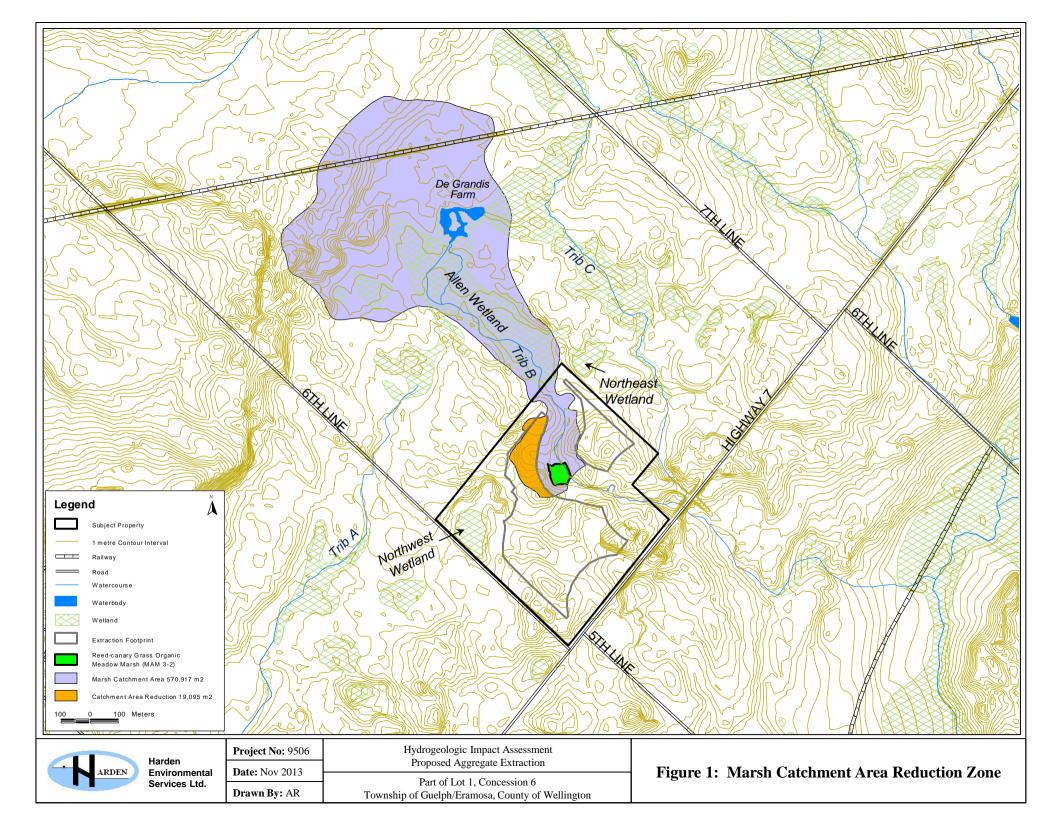
Harden Response to Comment 8

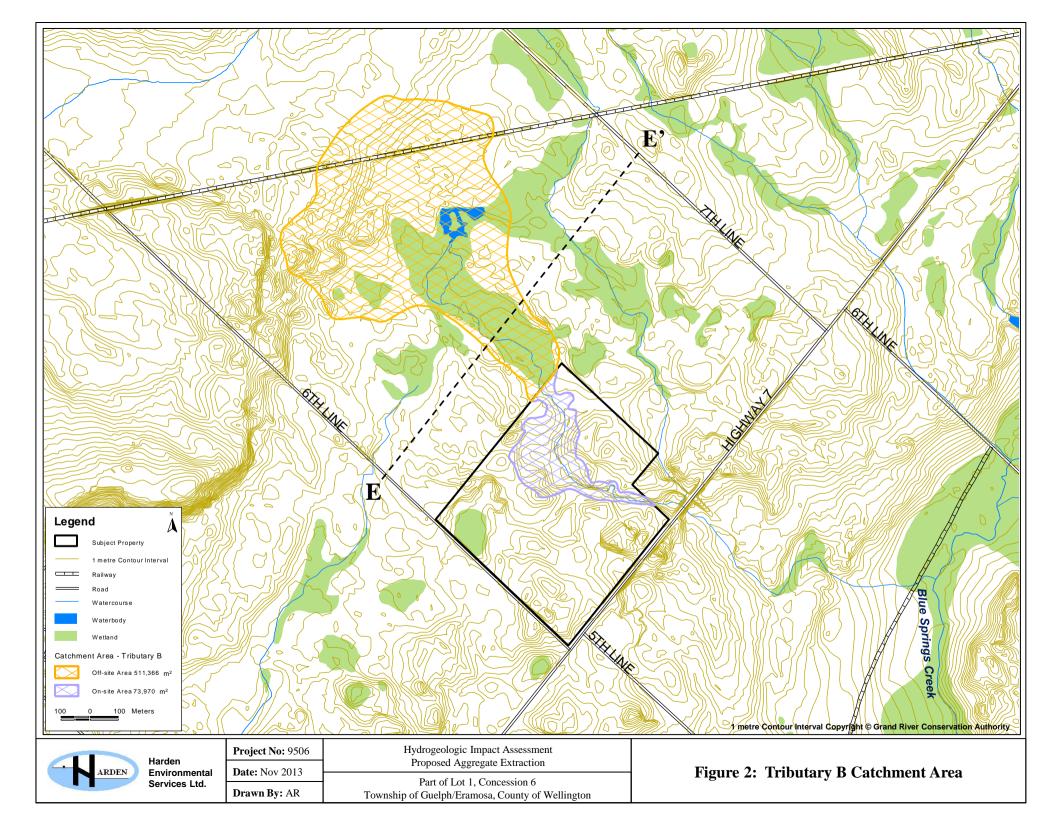
M15 is located in the footprint of the proposed extraction area. There was criticism from private groups and the consultants of the township of Guelph Eramosa that little data was available from within the footprint of the proposed extraction area. M15 serves this purpose and was used for verification of geology, fracture density, vertical water sources and water quality. M15 will be converted to a multi-level monitor and used to monitor the effects of a proposed pumping test in the Rockwood Municipal Well TW2. M15 will be used to monitor water levels and water quality until such time as it is necessary to remove the bedrock at that location. A replacement well will be drilled within 10 metres of M15 and outside of the extraction area.

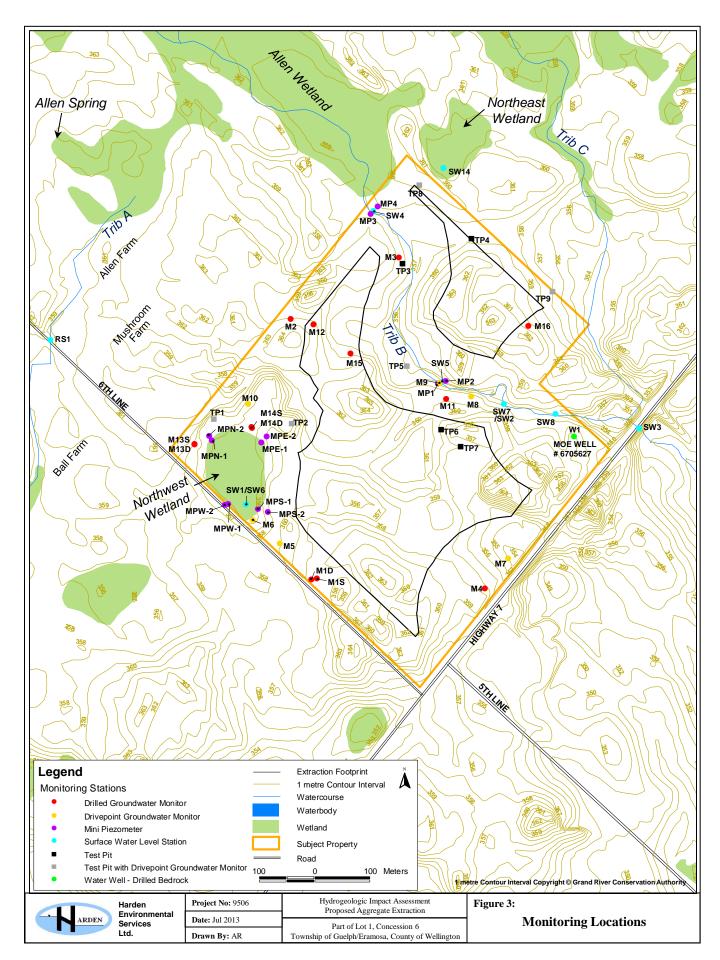
Sincerely,

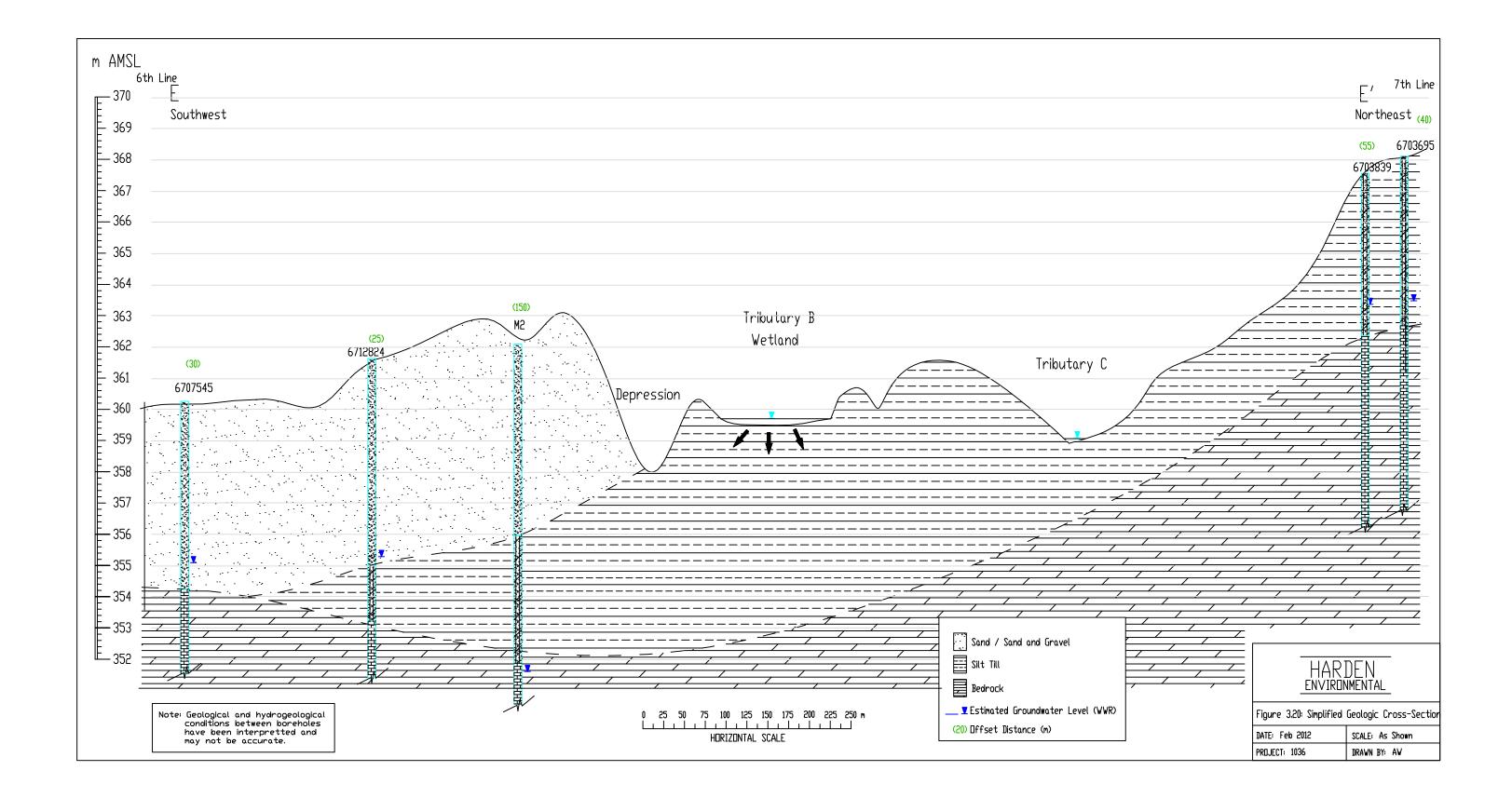
Harden Environmental Services Ltd.

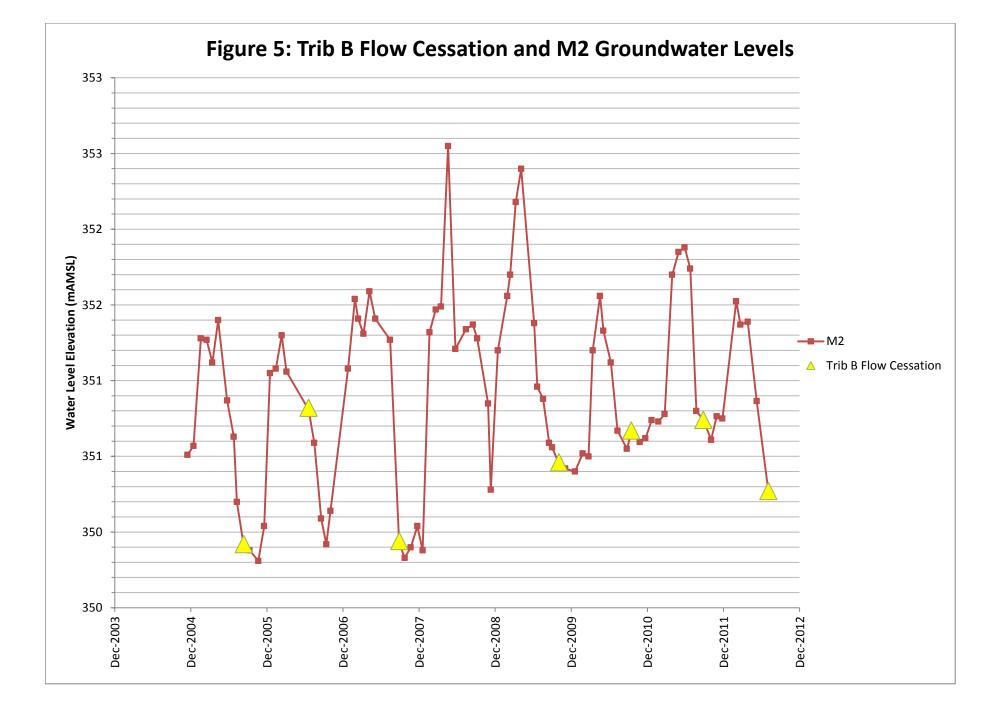
Stan Denhoed, P.Eng., M.Sc. Senior Hydrogeologist

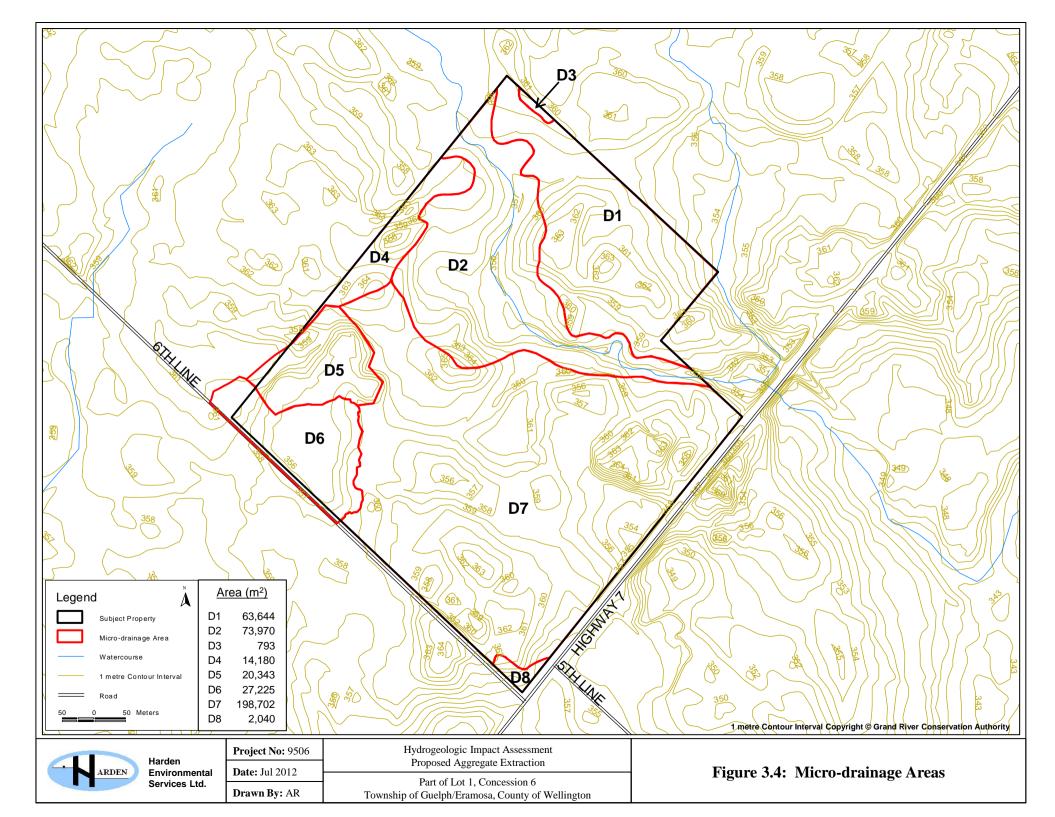


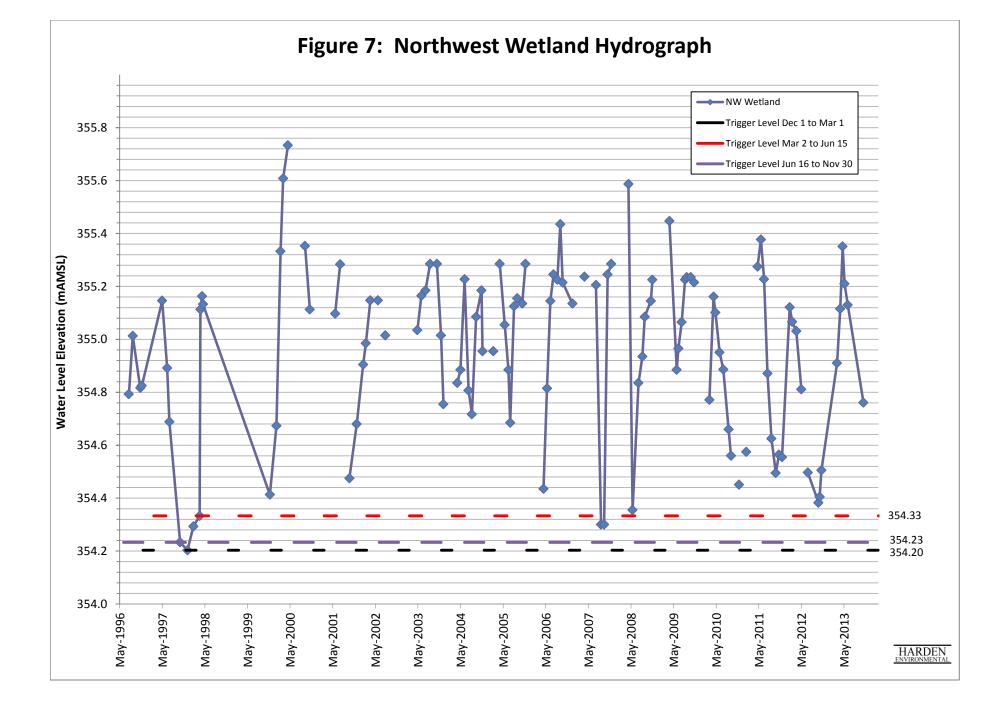












Appendix A

Revised Monitoring Program And Contingency Measures





Groundwater Studies

Geochemistry

Phase I / II

Regional Flow Studies

Contaminant Investigations

OMB Hearings

Water Quality Sampling

Monitoring

Groundwater Protection Studies

Groundwater Modelling

Groundwater Mapping

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

HIDDEN QUARRY

REVISED MONITORING PROGRAM AND CONTINGENCY MEASURES (NOV 26, 2013)

1.0 ON-SITE MONITORING PROGRAM

Monitoring has been taking place at this site since 1995. An extensive database of background groundwater and surface water elevations and flow measurements has been developed. A detailed monitoring program will continue to ensure that sensitive features and surface water flows are maintained. The monitoring program is designed to identify trends towards unacceptable impacts early on to allow for time to implement contingency measures.

The monitoring program for this proposed pit/quarry involves the following activities:

- measuring groundwater levels,
- obtaining water quality samples,
- monitoring water levels in the on-site wetland and stream, and
- stream flow measurements.

We recommend the following monitoring program.



Parameter	Monitoring Locations	Frequency		
	M16	bedrock extraction with re-evaluation of monitoring frequency after 1 st year of bedrock extraction.		
Groundwater Levels	M2, M3, TP1, M13S/D, M14S/D, M15, M16	Weekly during first 3 months of extraction		
Surface Water Level	Sinking Cut	Daily		
Surface Water Level	SW14	Manually Monthly April to November, February		
		Coincident with groundwater monitoring		
Surface Water Levels	SW6, SW4, SW8	Automated Water Level Readings (4 hour interval)		
Surface Water Flow	SW4, SW8, SW3	Monthly April to November *coincident with groundwater monitoring		
Groundwater Quality	M2, M4, M15, M16	Semi-Annually		
Surface Water Quality	West Pond, East Pond, Northwest Wetland	Annually		



Monitoring locations are shown on Figure C1.

2.0 TRIGGER LEVELS

Groundwater and surface water monitoring will be used at this site to a) verify that predictions of water level change in the bedrock aquifer do not exceed those predicted and b) verify that the hydro-period of the Northwest Wetland does not change. The water level measurements obtained as part of the monitoring program will be used to trigger contingency measures that may be necessary for the mitigation of a low water level in the Northwest Wetland, a lower than expected water level in the bedrock aquifer or an anomalous low flow level in Tributary B.

2.1 Trigger Levels for the Bedrock Aquifer

The greatest water level change in the bedrock aquifer is expected to occur to the north and northwest of the site. Water levels obtained from bedrock monitors M1D, M13D, M14D and M2 will be used to verify that actual water level changes do not exceed the predicted water level change. A warning level of 75% of the predicted change will be used to initiate bi-weekly manual measurements from the groundwater monitors.

Monitor	Historical Low	Predicted Change	Warning Level	Trigger Level
M1D	350.58	0.8	349.98	349.78
M2	349.81	2.0	348.31	348.08
M13D	352.68	1.4	351.63	351.28
M14D	353.48	1.5	352.36	351.98

 Table 1: Trigger Levels for the Bedrock Aquifer

The historical water levels, warning level and trigger level are presented in Figures C2, C3, C4 and C5.

2.2 Trigger Level for Northwest Wetland and Allen Wetland

Water levels from Station SW6 will be used to trigger contingency measures for the Northwest Wetland. Historical monitoring has shown that the water level in the wetland is somewhat independent from adjacent groundwater levels and therefore any potential change in the hydro-period is best determined by the surface water level in the wetland.

Trigger levels and warning levels have been determined for three periods as follows:

Winter Trigger Level - lowest water level observed between December 1 and March 1



Spring Trigger Level - lowest water level observed between March 2 and June 15

Summer/Fall Trigger Level - lowest water level observed between June 16 and November 30.

A warning level is established 0.15 metres higher than the trigger level. The warning and trigger levels relative to historical water levels are shown on Figure C6.

 Table 2: Trigger Levels for the Surface Water Features

Station	Winter		Spring		Fall	
	Warning	Trigger	Warning	Trigger	Warning	Trigger
Northwest	354.35	354.20	354.48	354.33	354.38	354.23
Wetland (SW6)						
Allen Wetland	The warning level will be a flow rate of less than 25 L/s occurring in					
(SW4)	May and the trigger level will be cessation of flow prior to June 22.					

Manual water level measurements will increase to bi-weekly if the warning level is exceeded.

3.0 CONTINGENCY MEASURES

3.1 Groundwater Levels and Northwest Wetland

If any trigger level is breached, the following measures will be taken;

- 1) Confirmation of water level within 24 hours.
- 2) Evaluation of precipitation, groundwater monitoring data and quarry activities to determine if quarry activities are responsible for the low water level observed.
- 3) If quarry activities are found to be responsible, the following actions will be considered and a response presented to the GRCA and the Township of Guelph-Eramosa.
 - increase the length and/or width of barrier
 - decreased rate (or stopping) subaqueous extraction
 - change in configuration of mining or decrease in mining extent
 - alter timing of extraction to coincide with high seasonal groundwater levels.



3.2 Groundwater Quality

Groundwater Monitors and the East and West Pond

The parameters that will be included in the semi-annual monitoring (summer) will be general chemistry, bacteria, TKN, ammonia, DOC, pH, temperature, anions and metals. In the event that there is an increasing trend in the concentration of one or more elements or compounds, a study will be conducted to determine the source of the water quality change. If the quarry is found to be responsible and if there is a potential for impact to downgradient wells, James Dick Construction Ltd. will commence with the following actions;

1) Semi-annual testing of the water quality of private wells that could potentially be impacted by the quarry.

2) In the event that a water quality issue related to the quarry occurs, James Dick Construction Ltd. will remedy the issue by either providing the appropriate treatment in the home or drilling a new well and isolating the water supply to the deeper aquifer

Northwest Wetland

The Northwest Wetland water will be analyzed annually in September for nitrate, dissolved oxygen, temperature, conductivity and pH for a period of three years or upon completion of construction activities in the surface water catchment area of the northwest wetland whichever is longer.

4.0 PRE-BEDROCK EXTRACTION WATER WELL SURVEY

We recommend that a detailed water well survey be completed prior to the commencement of the extraction of bedrock resources. This survey will as a minimum include all wells in the shaded area shown on Figure C7. The well survey will include the following;

- construction details of the well (drilled, bored, sand point etc..)
- depth of well and depth of pump
- location of well relative to septic system
- static water level



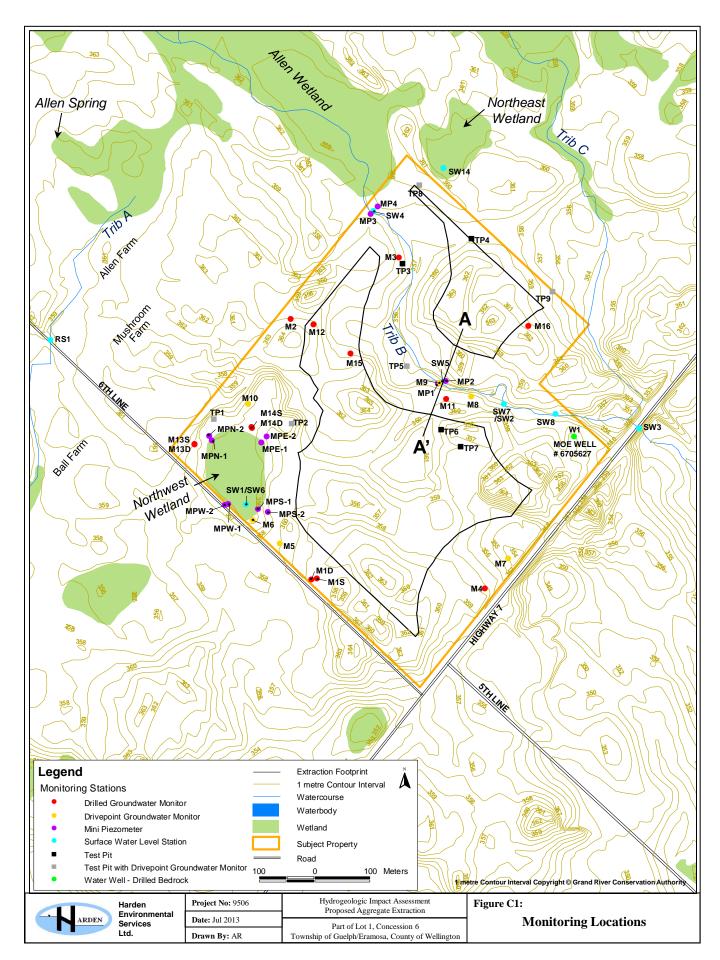
- history of water quantity or quality issues
- comprehensive water sample including bacteriological analysis, general chemistry, anions and metals
- one hour flow test

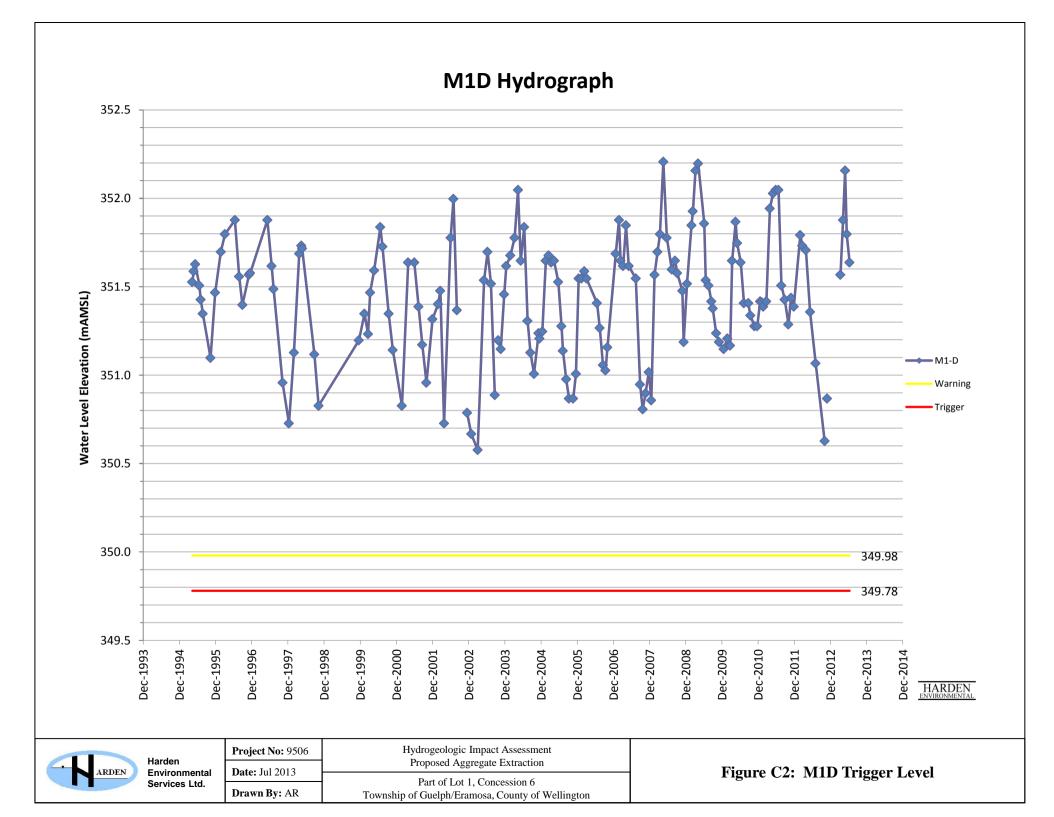
The purpose of the survey is to have a baseline evaluation of both water quality and water quantity in nearby water wells. Should an issue arise with a local water well, the baseline data can be used as a reference against future measurements.

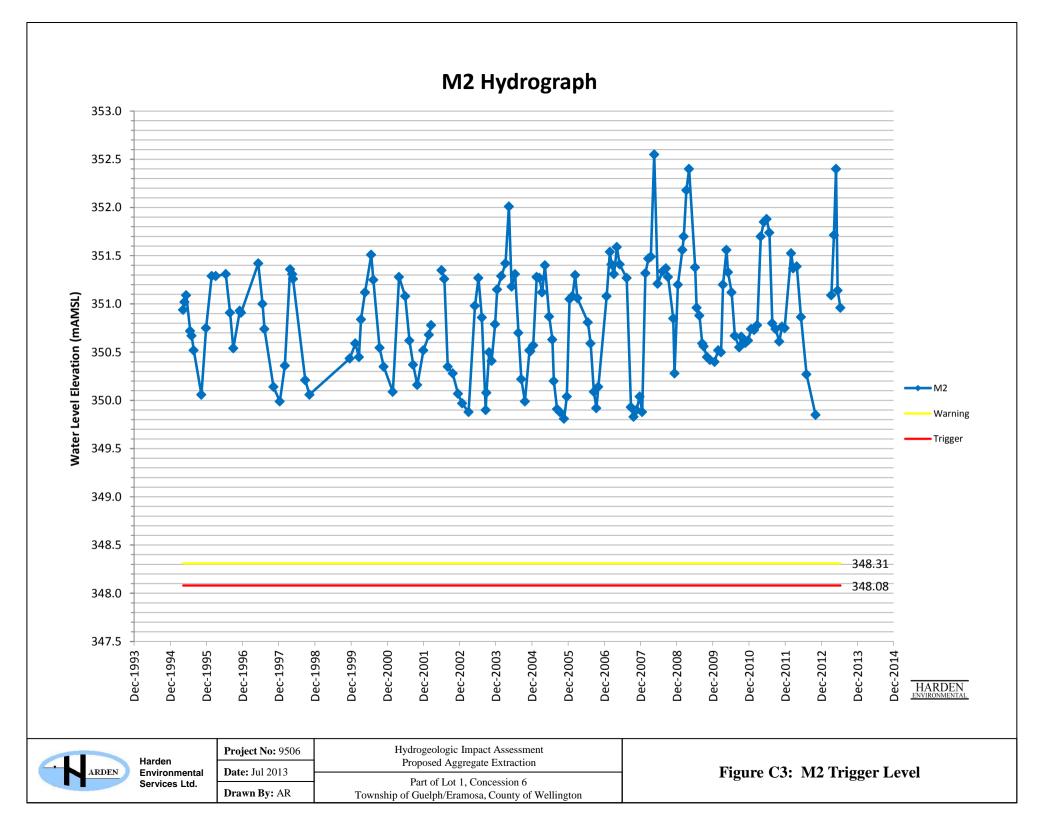
5.0 ANNUAL MONITORING REPORT AND INTERPRETATION

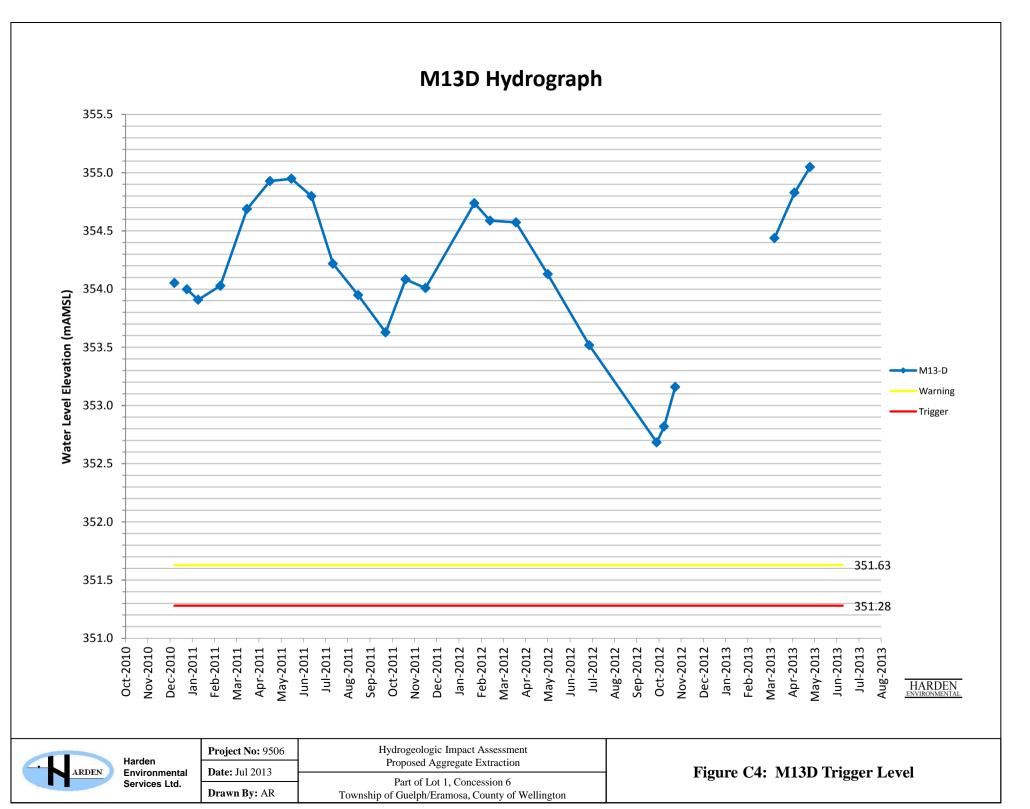
An annual report will be prepared and submitted to the Ministry of the Environment and the Ministry of Natural Resources on or before March 31st of the following calendar year. The report will be prepared by a qualified professional, either a professional engineer or a professional geoscientist.

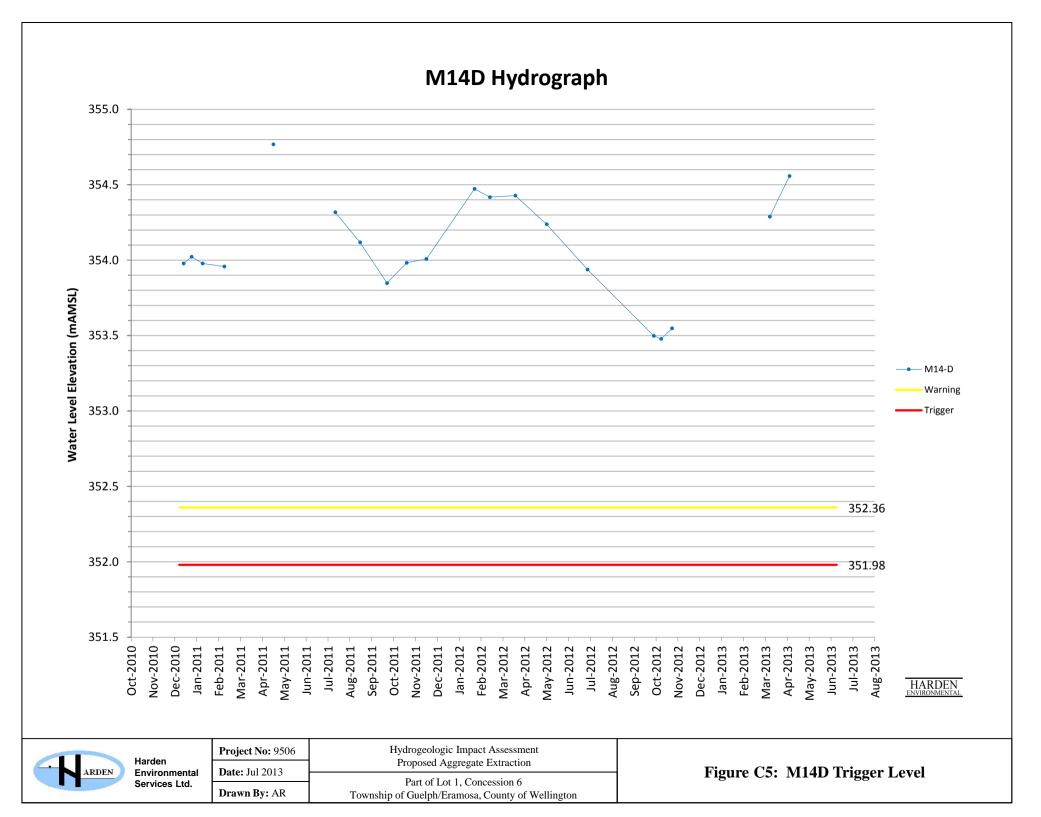
The monitoring report will include all historical monitoring data and an interpretation of the results with respect to potential impact to the quality and quantity of bedrock groundwater, hydro-period of the Northwest Wetland and streamflow loss from Tributary B.

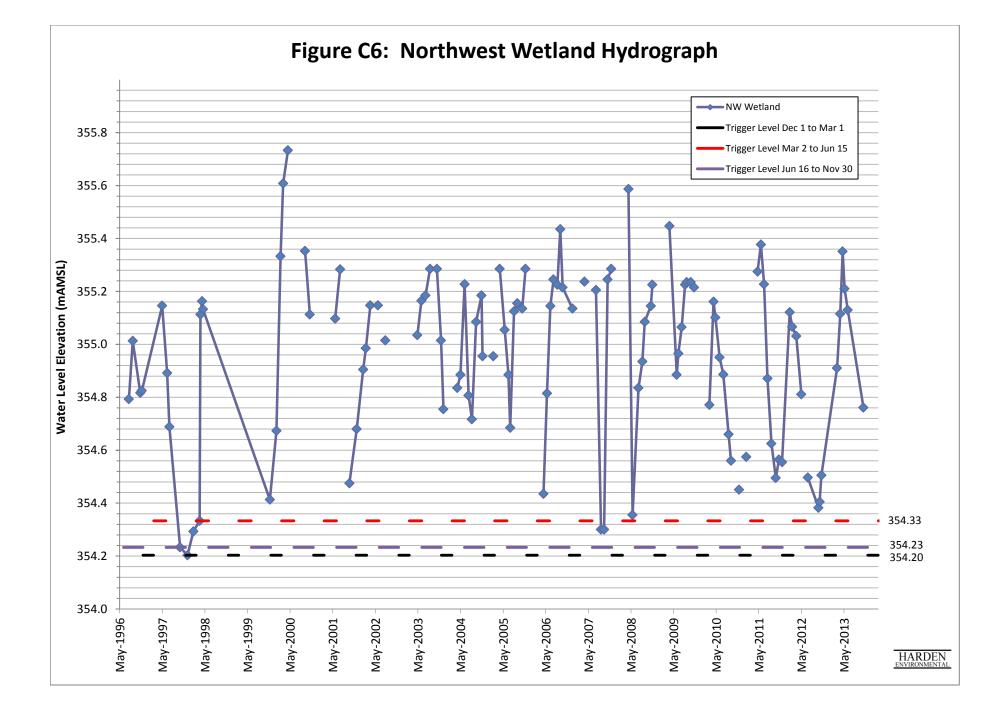


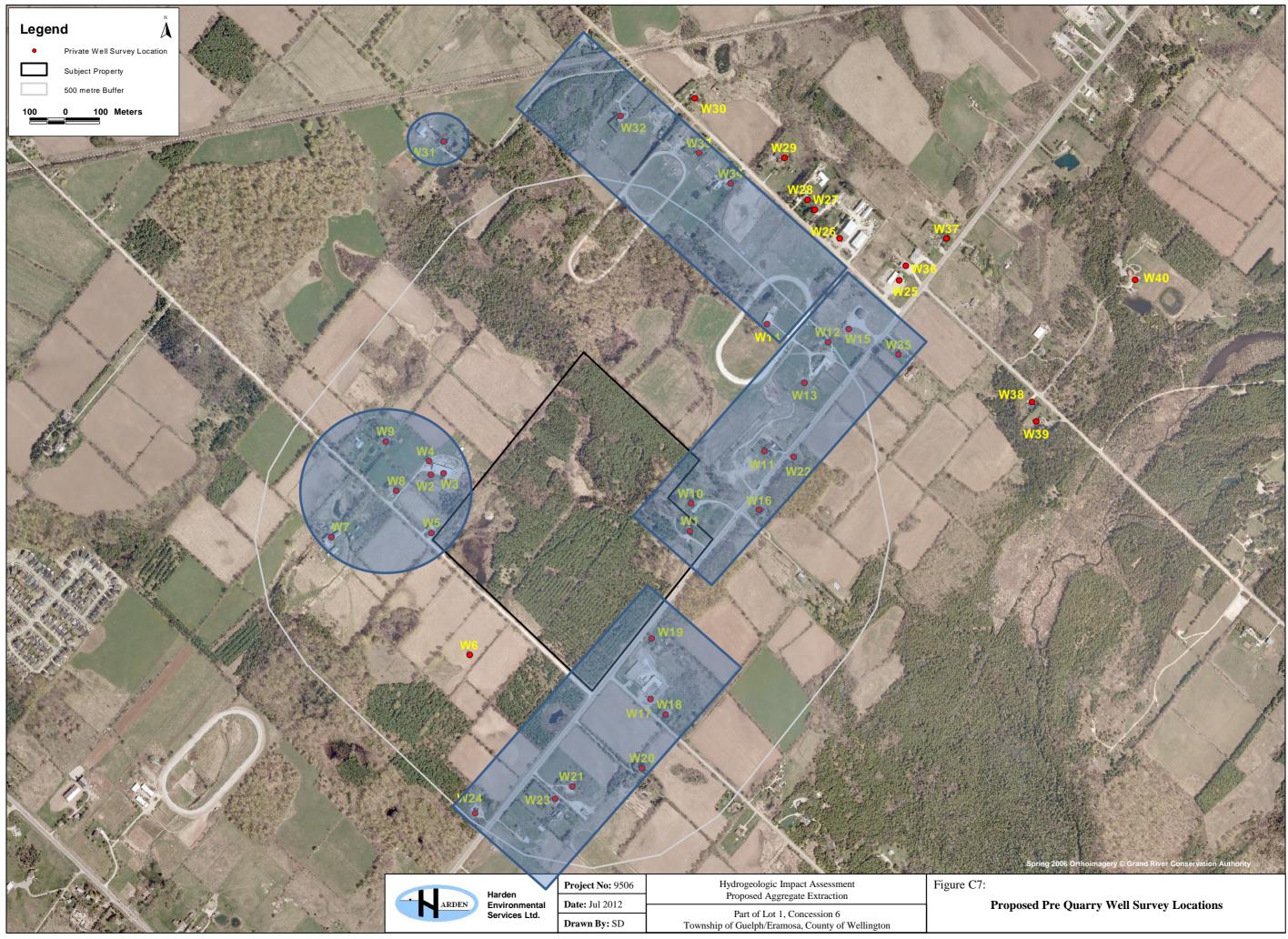












Leigh Mugford

From: ent: To: Subject: Jason Wagler <jwagler@grandriver.ca> January-24-14 1:08 PM Leigh Mugford; sdenhoed@hardenv.com RE: site plans latest version

Good Afternoon Leigh and Stan,

We have just completed our review of the response letter issued by Harden Environmental dated November 26, 2013 and the related attachments and site plans submitted on December 5, 2013. Overall, the response has adequately addressed our previous comments and concerns regarding water balance and hydrogeology. The monitoring plan has been revised based on GRCA's input, includes warning and action trigger levels and contingencies, and will involve annual reports to the MOE and MNR. The following two remaining comments are offered:

- 1. There is no indication that the riparian wetland shown on the drawings accurately represents what we observed during our site visit in June 2013. Please provide additional confirmation that the riparian wetland shown the plan is based on a survey of the staked wetland boundary that was verified in the field by the GRCA on June 7, 2013.
- 2. With respect to the section entitled "wetland creation" on Page 4 of 5, we question whether the wetland side slope should be allowed to naturally regenerate. We note that a minimum of 100 mm of topsoil will be applied to this area, which will remain unstable until vegetation becomes established. Colonization by invasive species could also jeopardize the rehabilitation plan unless an aggressive planting plan is developed and implemented. Therefore, it is strongly recommended that the site be actively managed to ensure the establishment of a diverse wetland community consisting of the species listed on this plan.

Based on the remaining comments, I suggest sending revised plans and a response letter addressing the above noted comments via email. Once the comments are addressed, we can provide formal correspondence to both the November 26, 2013 submission and the revised plans in one letter.

I trust this comments are of assistance. Please let me know if you have any questions.

Regards,

Jason Wagler, MCIP, RPP Resource Planner Grand River Conservation Authority 400 Clyde Rd, Cambridge ON N1R 5W6 (519) 621-2763 x2320 www.grandriver.ca

From: Leigh Mugford [mailto:lmugford@jamesdick.com] Sent: December-09-13 2:42 PM To: 'sdenhoed@hardenv.com'; Jason Wagler Subject: RE: site plans latest version

Please see the attached revised site plan page 5 – the copy I sent last week was not the last version – please replace with this one

Sorry for the confusion.

1

Leigh

From: Leigh Mugford Sent: December-05-13 3:16 PM To: <u>sdenhoed@hardenv.com</u> Subject: site plans latest version

Leigh Mugford Quality Control & Project Manager James Dick Construction Ltd Imugford@jamesdick.com office 905-857-3500 cell 416-579-9426 fax 905-857-9085







MAIL: P.O. Box 470, Bolton, Ontario. L7E 5T4 COURIER: 14442 Regional Road 50, Caledon, Ontario. L7E 3E2 TELEPHONE: (905) 857-3500 FAX: (905) 857-9085

March 19, 2014

Jason Wagler Resource Planner GRCA jwagler@grandriver.ca

Re: Hidden Quarry Revised Site Plans March 2014

In response to your message dated January 24, 2014 we have made additional notes to the Hidden Quarry site plans to address the two points in the message.

In order to satisfy point 1 from your message please find the following note on the site plan pages 1,2 and 4:

The riparian wetland boundary and the PSW boundary were flagged by GWS staff and verified in the field by the GRCA on June 7, 2013.

To address point 2 please find the following note on page 4:

To help accelerate the natural process of plant succession the following wetland species will be randomly planted in small clusters at a 0.5 to 1.0m spacing along the shoreline of the quarry ponds: northern water plantain, broadleaf arrowhead, etc.

If these are satisfactory I expect you will be able to respond to the November 26, 2013 submission and the site plans in one letter as indicated in your message.

Yours truly,

eigh Muglad

Leigh Mugford Quality Control and Project Manager James Dick Construction Ltd



400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

April 23, 2014

Ms. Kimberly Wingrove Township of Guelph/Eramosa 8348 Wellington Road 124 P.O Box 124 Rockwood, ON N0B 2K0

Mr. Jason McLay Ministry of Natural Resources 1 Stone Road West Guelph, ON N1G 4Y2

Dear Ms. Sheppard & Mr. McLay:

Re: Review of Revised Materials Proposed Hidden Quarry - 634745 Ontario Limited (James Dick Construction) Class A, Category 2 Pit and Quarry License Application and Zoning By-law Amendment Application ZBA 09/12 (Hidden Quarry) Lot 1, Concession 6, Former Township of Eramosa 8352 Highway 7, Township of Guelph/Eramosa

Grand River Conservation Authority staff has reviewed the following revised materials provided in support of the proposed Hidden Quarry:

- Response to GRCA Comments, prepared by James Dick Construction Limited, dated March 19, 2014
- Page 1 of 5, Existing Features, prepared by Stovel & Associates, dated March 11, 2014
- Page 2 of 5, Operations Plan, prepared by Stovel & Associates, dated March 11, 2014
- Page 4 of 5, Progressive Rehabilitation And Final Rehabilitation, prepared by Stovel & Associates, dated March 11, 2014

In light of our review, we suggest that the subject applications are deferred until the following comments are addressed:

Monitoring Plan

We note that the monitoring program outlined by Harden Environmental in a letter report dated November 26, 2013 has not been accurately reflected on the Operations Plan (Page 2). We suggest that the following monitoring components be corrected on the drawing (as underlined) or added to this plan (as underlined):

- Surface Water Levels SW6, SW4, SW8 <u>Automated Water Level Readings (4 hour interval)</u>
- Surface Water Level Sinking Cut Daily monitoring location is not clear
- Surface Water Flow SW4, SW8, SW3 <u>Monthly</u> (a higher frequency vs semi-monthly) April to November *coincident with groundwater monitoring
- Surface Water Quality West Pond, East Pond, Northwest Wetland

It is also suggested that the locations of all groundwater and surface water monitors illustrated on Figure C1 of Harden's letter report be plotted on Page 1 (Existing Conditions) for clarity.

We also note that the monitoring plan appears to be limited to a consideration of planting success rates only. A monitoring plan that assesses the efficacy of proposed habitat rehabilitation objectives is also recommended. General indicators of rehabilitation success include measures such as species diversity, plant density, and the percentage of native species. Specific monitoring methods include the following:

- Photographic inventories to document changes over time
- Surveys of final ground elevations to determine the degree of compliance with design criteria
- Groundwater and surface water measurements to determine if the desired or suitable hydrologic conditions have established in rehabilitated wetland areas
- Assessment of vegetation characteristics including species density, distribution, percent cover, floristic quality, etc.
- Biological surveys of target conservation priority species
- Water quality monitoring to assess nutrient levels (nitrate and phosphorus), pH, dissolved oxygen, and alkalinity and potential impacts on target fish species and other aquatic flora and fauna.

Rehabilitation Plan

GRCA's previous recommendation to actively managing the site's natural rehabilitation has been addressed. We agree with the statement in the response letter that northern water plantain and broadleaf arrowhead should be planted in order to accelerate the wetland rehabilitation plan. We also recommend that other species listed on the rehabilitation plan (i.e. blueflag, pickerel weed, Bebb's sedge, stipitate sedge, soft rush, fowl mana grass, Virginia wild rye, rice cut-grass, woolgrass, dark-green bulrush, softstem bulrush, broad-leaf cattail, white water-lily, water smartweed, sago pondweed, floating pondweed, or other suitable species that are available) be planted to avoid competition by non-native, invasive species. Substrates may vary from bare bedrock to parent mineral material (sand, gravel, cobble) to organic substrates. Hydrophytic emergent cover should exceed 25% and be dominated by grasses, sedges, and rushes. Water levels within shallow marsh areas should not exceed 2 metres.

In contrast to the aquatic, wetland, and terrestrial rehabilitation plans, details regarding the cliff face rehabilitation as proposed in Section 7.6 Environmental Enhancement – Progressive and Final Rehabilitations Plan of the Level II Environmental Technical Report are lacking in the 'Notes' section of the rehabilitation plan. The creation of landforms such as cliffs, talus, crevices and caves should be considered and implemented where practical. It is generally recommended that quarry faces be designed so as to mimic those that occur naturally, though it is also recognized that most active quarries now being closed apparently have avoided steep rock faces owing to safety concerns. If this option is pursued, the plan should follow the habitat characteristics outlined by the Ecological Land Classification System for Southern Ontario (Lee et al. 1998) and details should be provided in the notes. Further detail regarding the creation of provincially significant habitat types and habitat for species at risk can found in the "Best Practice Guidelines for Aggregate Rehabilitation Projects", which was developed in 2008 by Savanta Inc., et. al.

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Please contact Jason Wagler at 519-621-2763 ext. 2320 if you have any questions or require clarification of the above.

· Yours truly,

Jason Wagler MCIP RPP Resource Planner Grand River Conservation Authority

 MSH Planning c/o Liz Howson County of Wellington c/o Aldo Salis Regional Municipality of Halton c/o Adam Huycke Burnside c/o Carley Dixon James Dick Construction c/o Greg Sweetnam & Leigh Mugford – Box 470 Bolton ON L7E 5T4

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JAMES DICK CONSTRUCTION LIMITED



MAIL: P.O. Box 470, Bolton, Ontario. L7E 5T4 COURIER: 14442 Regional Road 50, Caledon, Ontario. L7E 3E2 TELEPHONE: (905) 857-3500 FAX: (905) 857-9085

June 6, 2014

Jason Wagler MCIP RPP Resource Planner Grand River Conservation Authority

Re: Response to GRCA letter dated April 23, 2014 regarding revised materials Hidden Quarry

We have reviewed your letter and have implemented the suggestions on our site plans as requested. We will send a copy of the revised site plans for your review. We trust they will be satisfactory.

Monitoring Plan

- On Page 2 we have included the most up to date version of the water monitoring plan which includes the list of additions in your letter.
- The location of the sinking cut monitoring is added to Page 3 the quarry operations page identified as Sinking Cut Water Level Monitoring Location.
- All groundwater and surface water monitors from Figure C1 have been added to Page 1 as requested.
- As requested additional information has been added to the 'Monitoring' section on page 4 taking into account the suggestions made by the GRCA.

Rehabilitation

- Edits have been made to the Notes on Page 4, in the Wetland Creation section to address the additional species that can be planted. An additional point has been added to include details suggested in the GRCA letter.
- On page 4 the Quarry Face section is now called Cliff and Talus Slope Rehabilitation, which has been rewritten using the sources suggested by the GRCA letter.

Yours truly,

eightund

Leigh Mugford Quality Control & Project Manager James Dick Construction Ltd Imugford@jamesdick.com office 905-857-3500 cell 416-579-9426 fax 905-857-9085





400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

July 8, 2014

Ms. Kimberly Wingrove Township of Guelph/Eramosa 8348 Wellington Road 124 P.O Box 124 Rockwood, ON N0B 2K0

Mr. Jason McLay Ministry of Natural Resources 1 Stone Road West Guelph, ON N1G 4Y2

Dear Ms. Sheppard & Mr. McLay:

Re: Review of Revised Materials

Proposed Hidden Quarry - 634745 Ontario Limited (James Dick Construction) Class A, Category 2 Pit and Quarry License Application and Zoning By-law Amendment Application ZBA 09/12 (Hidden Quarry) Lot 1, Concession 6, Former Township of Eramosa 8352 Highway 7, Township of Guelph/Eramosa

Grand River Conservation Authority staff has reviewed the following revised materials provided in support of the proposed Hidden Quarry:

- Response Letter to GRCA Comments, prepared by James Dick Construction Limited, dated June 6, 2014;
- Page 1 of 5, Hidden Quarry Site Plans, prepared by Stovel & Associates, dated June 6, 2014.

In light of our review, we suggest that the subject applications are deferred until the following comments are addressed:

Page 2 (Operations Plan)

The notes indicate that culvert installation should occur in the summer months when there is no flow in the stream. In the event that there is summer base flow, we recommend that the notes be revised to indicate that no in-water work occurs during the warm water fisheries timing window (April 1 to July 31).

The wording under "Contingency Measures" is subject to broad interpretation. We recommend that the established trigger levels for the various groundwater monitoring wells be added to this plan under this section. If groundwater levels drop below the trigger level in any of the monitoring wells, then one or more of the following contingencies shall be implemented (rather than "could be considered"):

Page 4 (Progressive & Final Rehabilitation Plan)

White Ash is still listed as a species to be planted on Page 4. Because of its susceptibility to emerald ash borer, this species should be replaced with another suitable species. It is also recommended that no vegetation clearing take place during the bird breeding period (May 15 - July 31). Additional wildlife mitigation measures (i.e. exclusion fencing, timing windows) should be implemented as necessary during operational and progressive rehabilitation stages.

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Page 1 of 2

Please contact Jason Wagler at 519-621-2763 ext. 2320 if you have any questions or require clarification of the above.

Yours truly,

Jason Wagler MCIP RPP Resource Planner Grand River Conservation Authority

 cc. MSH Planning c/o Liz Howson County of Wellington c/o Aldo Salis Regional Municipality of Halton c/o Adam Huycke Burnside c/o Carley Dixon James Dick Construction c/o Greg Sweetnam & Leigh Mugford – Box 470 Bolton ON L7E 5T4

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MAIL: P.O. Box 470, Bolton, Ontario. L7E 5T4 COURIER: 14442 Regional Road 50, Caledon, Ontario. L7E 3E2 TELEPHONE: (905) 857-3500 FAX: (905) 857-9085

July 10, 2014

Jason Wagler Resource Planner GRCA jwagler@grandriver.ca

Re: Hidden Quarry Revised Site Plans July 10, 2014

In response to your message dated July 8, 2014 we have made additional notes to the Hidden Quarry site plans to address the points in your letter.

In order to satisfy point 1 regarding the timing of Culvert construction, please know that we have adopted your suggested wording. This can be found in the fifth bullet under Level II Natural Environment Technical notes on page 2 of 5.

To address point 2 regarding Trigger levels and contingency measures, we have included a table entitled Trigger Levels and Contingency Measures on Page 4 of 5. This table is also referred to on Page 2 of 5 the Operations Plan. The table summarizes Trigger Levels as requested and provides Contingency Measures that shall be implemented.

Point 3 concerning White Ash has been addressed by removing reference to Ash. It was included on the species list in reference to the ELC Community list for Carbonate Treed Cliff Ecosite.

Point 4 concerned adding a note to eliminate vegetation clearing during the bird breeding season. Please see note 26 on page 2 of 5 that adopts the language requested.

Finally, we have added a note concerning Tree Protection Silt Fencing on Page 4 of 5 entitled Sediment and Erosion Control, as well as adding the fence on page 2 of 5, the Operations Plan.

We trust that these modifications to the site plan address all of the outstanding concerns of the GRCA. Kindly reply to us at your earliest convenience.

Yours truly,

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Leigh Mugford Quality Control and Project Manager James Dick Construction Ltd



400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519.621.2761 Toll free: 866.900.4722 Fax: 519.621.4844 Online: www.grandriver.ca

July 29, 2014

Ms. Kimberly Wingrove Township of Guelph/Eramosa 8348 Wellington Road 124 P.O Box 124 Rockwood, ON N0B 2K0

Mr. Jason McLay Ministry of Natural Resources 1 Stone Road West Guelph, ON N1G 4Y2

Dear Ms. Wingrove & Mr. McLay:

Re: Review of Revised Materials

Proposed Hidden Quarry - 634745 Ontario Limited (James Dick Construction) Class A, Category 2 Pit and Quarry License Application and Zoning By-law Amendment Application ZBA 09/12 (Hidden Quarry) Lot 1, Concession 6, Former Township of Eramosa 8352 Highway 7, Township of Guelph/Eramosa

Grand River Conservation Authority (GRCA) staff has reviewed the following revised materials provided in support of the proposed Hidden Quarry:

- Response Letter to GRCA Comments, prepared by James Dick Construction Limited, dated July 10, 2014;
- Pages 1 to 5, Hidden Quarry Site Plans, prepared by Stovel & Associates, dated July 14, 2014.

Based on the submission of the above noted materials, our comments dated July 8, 2014 have been addressed as follows:

1. The notes on the revised Operations Plan now include the appropriate fisheries timing window for the culvert construction.

2. The established Trigger Levels and Contingency Measures have been added to the plans under a single table on Page 4.

3. We note that reference to White Ash species has been removed from the plans. We also note that tree protection fencing has been added under the Sediment and Erosion Control section and a note has been added to the Operations Plan indicating that no tree removals will take place during the bird breeding period of May 15-July 31.

At this time, GRCA has no further comments on the application. As such, GRCA has no objection to the application being taken forward for consideration.

GRCA would be open to review and comment on any additional information circulated by the Township.

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Please contact Jason Wagler at 519-621-2763 ext. 2320 if you have any questions or require clarification of the above.

Yours truly,

Jason Wagler MCIP RPP

Resource Planner Grand River Conservation Authority

 cc. MSH Planning c/o Liz Howson County of Wellington c/o Aldo Salis Regional Municipality of Halton c/o Adam Huycke Burnside c/o Carley Dixon James Dick Construction c/o Greg Sweetnam & Leigh Mugford – Box 470 Bolton ON L7E 5T4

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