



- Page 25 speaks to surrendering of the licence but makes no comment to removal of the zoning. A plan to rezone the property back to Agricultural must be created.
- Page 29 and Traffic Study. The summary and the traffic study state that the recycling component will not add to the overall number of traffic trips, however no traffic is assigned to the topsoil component or other accessory traffic (i.e. for staff etc.) to and from the site.
- For a worst case scenario, assume that recycling component and topsoil operation will add to the overall number of traffic trips.
- Page 29, the number of truck trips is estimated to be about two per hour. This should be clarified to a total of about five truck trips with just over two in and two out per hour.
- Address the proposed agreement with the Township, with anticipation of proposed wording, when the improvements will take place, how costs will be paid to the Township for any works etc.
- Page 33 – Noise, does not take into account the dwelling on site, this assumes the owner of the property will reside in the dwelling. If the dwelling on site is to be rented then noise to the dwelling on site should be considered and addressed.
- Pg. 43 Cultural heritage. No report was submitted that in fact addressed the Township requirements of OPA 13. However, township staff has not required a Cultural Heritage study and acknowledge that the proposed pit and the area do not fall within any known or anticipated CHL's boundaries.
- Page 48 and 52, monitoring of noise and wells, copies of such monitoring should be provided to the Township, and copies of any complaints regarding noise and how they are addressed should also be sent to the Township. Amend the Operational Plan to ensure copies of these are sent to the Township on a regular basis.
- Page 52 – d) should probably read Phase 1 not Phase 2.
- Page 52 – recycling notes. Recycling of material should cease and be removed from the site prior to final rehabilitation.
- Provide a reasonable life expectancy for the extraction to take place with justification of this proposed life expectancy.

#### Environmental

- No issues, beyond those already identified and addressed through MNR and GRCA.

#### Traffic Study

- Page 7 – revise to note the tonnage limit of 150,000 tonnes not 150,000 to 200,000.
- Page 7 – a time frame of 8 to 10 years is proposed but it is not clear where this number comes from. With 839,500 tonnes of material, and if the maximum tonnage of 150,000 removed per year, then the minimum life of the pit is 5.6 years. From a traffic standpoint the worst case scenario is important to know the typical amount of traffic to be anticipated. However the report should also address the reasonable life expectancy for the choice of horizon date. Please provide justification for the estimation of the pit life, and note that the Township may be seeking to guarantee such a time frame in conditions of approval.

- Revise the cumulative impact to reflect changes in the Hunder Application traffic numbers and include any implications of the Capital Paving application.
- The subject report relies on a 220 day operation, however, other pits in the area are using 194 working days, explain the choice of 220 days.
- Page 29 of the Planning Summary comments to a 30 tonne truck, where the traffic study on page 7 refers to using a 25 tonne truck. Address the inconsistency and revise accordingly.
- Page 18, comments to the need for a right turn lane taper but does not address the issue further. Explain and address.
- Recommendations in the traffic study refer to road improvements. Identify a method to address how 'sustained efforts' will ensure dust is controlled, what are sustained efforts, how drivers will be reminded of safety issues, and how and when the re-grading will take place at Jigs Hollow and Northfield.

#### Visual

- Township staff remain concerned with the visual impacts (loss of view) at 110 and 114 Peel Street and with the visual impacts associated with the height of stockpiles.

#### Noise

- The rehabilitation plan and report identify that ongoing noise monitoring is to be performed twice annually, and should also include that the monitoring be completed when the operation is at peak levels (crushing).
- The plan and report should also reflect that copies of the monitoring be provided to the Township.
- In terms of the revised noise classification, the decision to maintain the one receiver in Golf Course at a Class 2 level is of a concern. The area of the Golf Course, although part of the settlement of Conestogo, would still appear to be in a rural area and recreational area (golf course), as this area: is separated from the main area of Conestogo, is separated from heavier traffic routes (i.e., Sawmill Road), and although the community as a whole is slightly over 1000 people the area of the Golf Course, being separate from the main portion of the community, has a much smaller population. The level of noise in the area, and from the measurements of the community would suggest that a Class 3 level may be more appropriate. Township staff will be discussing this issue with our peer review consultant to ensure the proper classification is applied.
- The limits of the Processing Area are not clear and need to be identified on the plan. The plans identify a 6 m high berm around an area close to the processing area. Is the entire processing area to be located inside the berm? If so is the berm height higher than the processing equipment?
- *Other comments will be addressed separately through the peer review process.*

#### Hydrogeological

- The report identified that the pit operation will not have a negative impact on the existing wells (25) around the pit (Neighbouring wells range in depth between 9.8 to 45.4 metres). The existing well locations assessed need to be identified on a

plan. There should be provisions outlined in the report to address what measures the developer will have to undertake if the private wells are negatively impacted.

- The Township Official Plan Section 11.11.9 identifies concerns with water resources and in accordance with this section, the Township shares and supports the comments/issues from the Region in this respect. As such the Township must be copied and such responses and also will need to be satisfied. Of key concern is the following:
  - That the high ground water levels versus depth of extraction have been addressed; and
  - Refueling area at the entrance is appropriately designed, and how refueling will be handled elsewhere in the operation (pit floor).

#### Dust/ Air Quality

- The studies and the revisions do not appear to take into account the topsoil operation. Please review and revise the studies and site plan as necessary to address this component.
- *Additional comments will be addressed separately through the peer review process.*

#### Aggregate Resources Inventory

- Test pits were completed in October of 2005 and do not necessarily show a high water table, although the monitoring wells placed in 2008 will provide more details. Please provide details with testing since 2008 to confirm the water table.

#### Proposed Zoning

- Provide details for the proposed zoning in terms of the temporary use for the topsoil component with respect to a maximum size, the need for the use, and locations to where the use will be restricted.
- The size of the topsoil operation needs to be addressed to ensure the use remains accessory in size. Provide a size and proposed area for the proposed topsoil operation.

#### Haul Route

- The proposed haul road entrance will require an Entrance Permit. A detail plan illustrating truck turning movements, sight lines, signage and grading information is required for the entrance.
- With respect to the detail plan and signage, provide signage to address the following:
  - applicable signage (i.e. advance truck turning, truck turning signage at entrance, directional arrow etc.). The signage is to be in accordance with the provincial regulations for mandatory uniform traffic control signage (M.U.T.C.).
  - Peel Street has an existing load restricted bridge to the east of the site. The developer is to provide additional signage on Peel Street to prohibit truck traffic from using this bridge.

- Revise the haul road entrance to Jigs Hollow Road with a minimum distance of 40 metres from the intersection with Peel Street. With the entrance location onto Jigs Hollow Road the pit operation will not impact Peel Street
- A daylight triangle at the intersection of Jigs Hollow Road and Peel Street and a 4.0 metre road widening along Peel Street is required. According to air photos the southeast corner at the intersection of Jigs Hollow Road and Peel Street the south radius of the road is on the subject property. Jigs Hollow Road has a 20 metre road allowance and Peel Street has a 12 metre road allowance.
- The township requires that the portion of the Township Road to be used for a haul route be paved to address the following issues:
  - This existing gravel section of Jigs Hollow Road currently experiences surface deterioration at the intersections with Northfield Drive and Peel Street and in the 90 degree bend in the road (i.e. washes boarding and potholes).
  - The soils report noted that the existing road structure varies between 450 to 700 mm of granular material and those sections of road in the lower elevations and the lane returning from the planned pit to Northfield Drive are more susceptible to degradation and will require replenishment of granular material and periodic regrading. With the additional heavy truck traffic the existing gravel roads will require additional frequent maintenance as supported by the soils report by Chung & Vander Doelen March 7, 2008.
  - The report also identified that intersection improvements are required at Northfield and Jigs Hollow with respect to turn lanes on Northfield Drive and regarding the approach on Jigs Hollow Road.
  - The Township's past experience with gravel pit operations have indicated that ongoing maintenance of Township roads by the pit owner is not always addressed in a timely manner relating to dust complaints and road restoration.

The haul route section to be paved would need to be 8.0 metres wide with two 50 mm lifts of HL4 asphalt.

- During the life of the pit the developer is required to ensure that the Township roads identified and used as a haul route to the pit are maintained in good condition. The developer is required to enter into an agreement with the Township addressing how the Township roads used for a haul route are to be maintained and to provide sufficient letters of credit/deposits for the same.

#### Rehabilitation

- Notes on page 3, Rehabilitation plan should note that all internal haul roads, fuel storage, weigh scale and signage should be removed as part of the rehabilitation.
- Rehabilitation of the pit will create a triangle at the southern tip of the property which will be a higher elevation as it is outside the area of extraction. From an agricultural perspective will this area remain part of the field and a usable portion of the farm? Explain. The same question is applicable to the 15 and 30 metre setbacks around the extraction area. If changes in elevation make these portions difficult for practical farming use, then address how rehabilitation could make the areas more useable.

- Rehabilitation plan uses a 3:1 slope along the edges of the property. The ability to farm this slope with farm equipment is questionable and must be demonstrated that the slopes can accommodate farm equipment movements (i.e., turns) etc. As rehabilitation of the slopes with 3:1 is a concern from a farming perspective, a 5:1 may be necessary.
- Match depths of restoration in the site plans and the report.
- The Rehabilitation Plan identifies that the pit will be restored with 15 to 20 cm of topsoil however the report identified that the topsoil restoration is to be 30 cm (pg 24 of Report).
- The Rehabilitation Plan is to identify the decommissioning of the scale house and truck entrance to the property (including the removal of the entrance culvert and restoration within the road allowance (i.e. ditch, road surface)).

#### General Comments

- Reports do not comment on the trail along Peel Street.
- Explain why two test pits were completed on the adjacent property across the road and no details provided of the same.
- Drawings should be revised to reflect the applicant's changed address.
- It is commented that a number of the test pits and the hydrogeological report show that significant material is below 1.5 metres above the water table. It should be noted that the proposed zoning if approved is likely to restrict the operation to an above water table extraction operation.
- Note 15 on drawing 2, should be revised to include that, at no point should the stockpile heights exceed the height of the berm along Peel Street to be visible from Peel Street.
- Note 18 on page 2, shall be revised to read "Aggregate washing: there will be no wash ponds associated with this licence or aggregate washing."
- Note 19 - Recycling of material should cease and be removed from the site prior to final rehabilitation.
- Note 20 – explain the scrap to be stored and why any needs to be stored on site.
- Noise Study, Note 8, on page 2, shall include reference to providing copies of the same to the Township.
- No notes are provided on the plan with respect to the topsoil operation, its functions, and when this operation shall cease. Provide notes with limitations of areas for the use, stockpile heights, and that the use shall cease once the aggregate on site has been depleted and/or the temporary use zoning has lapsed, whichever comes first.
- Sheet 4, Cross sections should show locations of test pits and/or monitoring wells as reference points.
- Provide and maintain silt fencing and erosion control measures around the proposed berms until vegetated. Temporary topsoil piles are also to have silt fencing around the base.
- The site plans are to ensure that existing drainage patterns external to the defined pit location are to be maintained.
- Table 2 in section 6.2 of the report is to be revised to read "Woolwich Township Official Plan Conformity".
- How will the gravel located below the proposed berms be extracted?

- The plan does not clearly identify what will happen with the existing two farm entrances and one field entrance to the property from Peel Street. Will these entrances be closed? The proposed haul road dissects the two farm entrances and if these entrances are to remain open they potentially could be used by trucks entering and exiting the site. These entrances would need to be closed to ensure that trucks do not use them.

It is also noted that although technical issues may be addressed to the extent possible that the Township staff will need to determine, whether and under what conditions (including cumulative impacts), we can recommend the application to Council.

If you have any questions or comments please feel free to send those in writing to the undersigned. Also, ensure that all comments to this letter and the peer reviews are sent to the Township, not the peer review consultants.

Yours truly,



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Senior Planner