



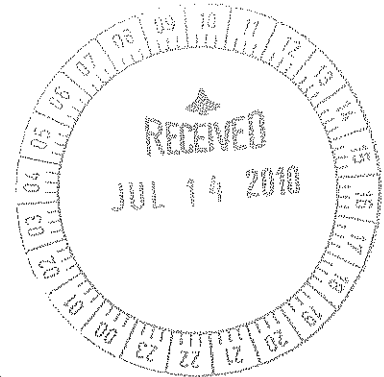
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July 12, 2010

Jeremy Vink
Senior Planner
Township of Woolwich
24 Church St. West, P.O. Box 158
Elmira, ON N3B 2Z6



Dear Mr. Vink:

**Re: Zone Change Application 3/2009- UPDATED COMMENTS
2167534 Ontario Inc.
125 Peel Street
TOWNSHIP OF WOOLWICH**

Hydrogeology

WESA Inc. (WESA) was retained by the Regional Municipality of Waterloo (Region) to conduct a technical review of the hydrogeological aspects of the proposed Jigs Hollow sand and gravel pit located on Peel Street within the Township of Woolwich. Our initial comments were passed on to the proponents in a letter from the Region dated February 2nd. These comments were addressed by Mitz & Associates Ltd. (MA) on behalf of the proponent in a letter dated April 5, 2010 and accompanied by a letter from IBI Group dated May 19, 2010. WESA has reviewed the MA material and offers the following comments. The numbered points are in keeping with the Region's letter and MA's reply.

1. Utilizing topographic survey information to determine the elevation of the monitoring wells does not provide a high degree of accuracy as stated by MA. We are in agreement with MA's indication that the well elevations will be properly surveyed-in as part of the spring monitoring.
2. MA has indicated that the thickness of the sand and gravel unit where extraction is proposed has been determined and replacement wells have been drilled in 2009. This information should be supplied to the Region for review.
3. MA has indicated that water level data has been taken regularly with the most recent monitoring in December 2009. This information should be provided to the Region for review.
4. No in-situ hydraulic conductivity data has been provided. WESA's previous comments related to wells installed within test pits. Presumably the replacement wells drilled in 2009 were not drilled within test pits and therefore in-situ testing should be possible, representative and should be conducted.
5. No information on a door-to-door survey of private wells in the vicinity of the proposed pit has been provided. MA has indicated that physical inspections have been conducted on the closest residents. This information has not been provided. It is not known how many residences are in

the area and whether the monitoring of the three closest wells prior to beginning operations is sufficient.

6. MA has indicated agreement to geochemical sampling twice a year but they have not specifically stated whether petroleum hydrocarbons will be included in this sampling as required by the Region's Guidelines.
7. No comment required.
8. The original MA report concluded that nearby wells are generally completed in deep confined aquifers. The reply from MA discusses confined conditions for the area. Are the "nearby" wells the same as the 3 closest wells referred to by MA in their reply? No detailed information on the wells in the immediate vicinity of the site has been provided. Are the closest wells to the property completed in the deep overburden or bedrock?

The two points shown below a) and b) from the original WESA comments have not been addressed:

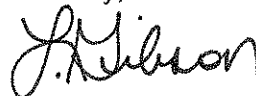
- a) The IBI Operational Plan presents differing refueling recommendations. Fuel would be stored near the site entrance and mobile equipment would refuel at that location. Semi portable equipment would be refueled by a fuel truck. However, the MA report recommends refueling on an impermeable pad. Presumably this pad is in reference to the fuel tank near the entrance but it is not known if any sort of pad has been designed or taken into consideration for the fuel storage area.
- b) The IBI Operational Plan also states that recycled asphalt and concrete will be stored within 2.0 m of the established groundwater surface. Will the recycling area be predetermined so that excavation does not proceed to within 1.5 m of the groundwater surface or will soil material be added to the pit floor to raise the floor 0.5 m?

General Comments

The owner/applicant should also be advised that any issuance of a building permit for future development on the subject lands will be subject to provisions of Regional Development Charge By-Law 09-024 or any successor thereof.

Please accept this letter as our request for a copy of the decisions and minutes pertaining to the zoning application noted above. Should you require Regional Staff to be in attendance at the meeting or have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Laurel Gibson, M.PL
Planner

cc: Diane Schwier, MNR