



CAPITAL PAVING INC.

Quality Construction by Quality People

P.O. Box 815 Guelph, Ontario N1H 6L8

October 23, 2020

Dr. Emil Frind, Ph.D., P.Eng. &

Michael Frind, M.Sc., P.Eng.

Department of Earth & Environmental Sciences

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Delivered VIA email

Dear Messrs Frind & Frind,

Capital Paving (Capital) is in receipt of your review, dated October 12, 2020, regarding Capital's Shantz Station Pit application and more specifically, a review of the Level 1 and Level 2 Hydrogeological Investigation prepared by Capital's consultant MTE Consultants Inc.(MTE) in support of the pit application. Your review was provided to us by Township of Woolwich staff since Capital was not copied.

We note that your review does not include contact information, a statement of whether or not you have been retained as an independent expert on behalf of a group or individual or whether you are acting on your own behalf. The review is also not signed. Furthermore, it is a general practice for experts among the professional community to advise their peers they will be undertaking a review of their reports. MTE was not advised a review of its hydrogeology report was going to be undertaken by you.

The review references only the MTE Level 1 and Level 2 Hydrogeological Investigation completed in May 2019 as the basis of your review. However, since that time to the present, there has been additional hydrogeological work completed and numerous correspondence between agencies and municipal peer reviewers which has resulted in clearance letters for hydrogeology from the Grand River Conservation Authority as well as the Region of Waterloo's independent peer reviewer, BluMetric Environmental Ltd. (Blumetric).

All of the above noted correspondence and additional work can be found on Capital's dedicated website www.shantzstationpit.com or alternatively on the Township of Woolwich's website www.woolwich.ca. This has been available for some time. If you were not aware of the additional information or have not been advised by anyone who may have retained you, I encourage you to review the materials on the website which may address many or all of your concerns.



MTE's hydrogeological investigation was prepared in accordance with the Region of Waterloo's guidelines for hydrogeological studies to the satisfaction of BluMetric, which also assisted the Region in the development of those guidelines. The teams at both MTE and BluMetric have extensive knowledge and expertise in the aggregate industry and have both worked on a number of aggregate applications as well as acted as peer reviewers for aggregate applications on behalf of municipalities.

Many of the recommendations outlined in section 15 of your review go well beyond standard industry practice or public policy and are not substantiated by evidence to warrant the recommendations being given. Your review did not include curriculum vitae for either of the authors so we are unaware of the level of expertise or experience as it relates to aggregate extraction.

With respect to groundwater monitoring, Capital can confirm that groundwater levels have been monitored regularly, with continuous dataloggers, and the company has proposed to continue monitoring until the pit is depleted and rehabilitated. The groundwater monitoring data will be compiled into an annual groundwater monitoring report and submitted to the Ministry of Natural Resources & Forestry as well as the Region and Township.

Your review also questions the ability of the lands to become productive farmland post rehabilitation. Capital has extensive experience in agricultural rehabilitation and has successfully completed rehabilitation to quality farmland at a number of our locations. In support of the application, Capital submitted an Agricultural Impact Assessment (AIA) which addresses rehabilitation requirements to the satisfaction of the Region's agricultural peer reviewer, Colville Consulting Inc. The AIA study, peer review and correspondence can all be found on Capital's Shantz Station Pit website.

Once again, I encourage you to visit our website at www.shantzstationpit.com and review the additional information and correspondence. We trust the review of this additional information will satisfy your concerns regarding the Shantz Station Pit.

Yours truly,



George Lourenco, P.Eng
Resources Manager
Capital Paving Inc.
2020 Chair of the Board, Ontario Stone Sand & Gravel Association

C.C Jeremy Vink, Township of Woolwich
 David Welwood, Region of Waterloo