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SENT ELECTRONICALLY AND BY REGULAR MAIL

February 4, 2016

Stovel and Associates Inc.
297 Briarhill Drive
Stratford, ON
N5A 7T1

ATTENTION: Robert Stovel

Dear Mr. Stovel:

RE: Aggregate Resources Act Application - Peyton Pit
Part of Lots 3 & 4, Concession 15 & 16
Geographic Township of Egremont
Township of Southgate (Hustonville Sand and Gravel Limited)

Further to the Saugeen Valley Conservation Authority (SVCA) letter dated November 30, 2012, pertaining to the proposed Official Plan Amendment and Zoning By-law Amendment, and the supplemental letter of December 13, 2012, and comment letter of June 20, 2014, and site meeting of December 14, 2015, revised plans dated January 13, 2016 and comment email of January 29, 2016 to the revised plans the SVCA offers the following supplementary comments on the proposed Peyton Pit. Authority staff conducted a site inspection of the properties on November 26, 2012 and June 17, 2014. A response to SVCA comments of December 13, 2012 were also reviewed associated with this proposal from both Stovel and Associates Inc. and ARL Groundwater Resources Ltd.. The following supporting documents were reviewed for matters that are relevant to the SVCA:

- *Summary Statement* prepared by The Murray Group Limited, dated June 2014
- *Water Table Assessment prepared by ARL Groundwater Resources Ltd.,* dated July 2012
- *Natural Environment Level 1 & 2 Report* prepared by Rob Stovel and Associates Ltd., dated March 10, 2014 (NER)
- *Planning Opinion Letters* prepared by Rob Stovel and Associated Ltd., dated July 31, 2012
- *Site Plans* prepared by Stovel and Associates Inc. dated March 6, 2014 and January 13, 2016.

The Authority offers the following comments on the proposed aggregate extraction:

1. Phase 1 of the proposed extraction operation requires a watercourse crossing over the Beatty Saugeen River. The Beatty Saugeen River and adjacent lands are subject to the Saugeen Valley Conservation Authority's Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation (Ontario Regulation 169/06). This Regulation requires that a person obtain the written permission of the SVCA prior to any “development” in a Regulated Area or “alteration” to

a wetland or watercourse. Details for this watercourse crossing have not been provided to the SVCA and, therefore, the probability of the SVCA issuing a Permit under Ontario Regulation 169/06 is unknown at this time. You have decided to proceed through the application process without Phase 1 lands included in the application. Should this phase be proposed as a site plan amendment, or should this plan get reintroduced there are a number of outstanding items to be addressed in the opinion of SVCA staff.

2. In the opinion of SVCA staff, the proposed Phase 2 processing area north of the treed ridge is located within the floodplain of the Beatty Saugeen River. As the proposed processing areas would occupy the floodplain, it must be demonstrated to the SVCA that neighbouring properties will not experience additional flooding under the Hurricane Hazel Flood event. The SVCA is not clear if extraction is proposed in this area. Potentially if extraction is proposed in this area a 'cut fill analysis' may clear up this matter. The SVCA understands at a minimum topsoil will be removed from the area which would result in a 'cut' of material from the area which could offset processing material brought to the area.

3. Section 5.3 (p. 42) of the Natural Environment Report (*NER)* pertains to Significant Forests. The report did not investigate the woodlands southeast of Phase 3; however, they are located within 120 metres of the extraction boundary. According to the Grey County Official Plan, these woodlands are considered significant. Please investigate this feature and identify potential impacts and any mitigative measures that may be required. Please indicate how you have addressed this feature.

4. More details to the proposed reforestation is needed associated with species composition survival, and required planning controls to be applied upon the return of the pit lands to agriculture.

5. Section 5.5 of the NER indicates that tree clearing on site should not occur during the breeding bird season and that a note be put on the operation plan should clearing be proposed in this time to avoid impacts via qualified personnel being onsite. Please transfer this note to the plan.

6. A topsoil berm is proposed in the phase 2 lands more than 90 metres north of the existing barn on site. This berm would be located in the floodplain and would impact the floodplain. Email correspondence of January 29, 2016 indicates this berm will be adjusted to extend only 80 metres north of the barn's northern wall. This would satisfy the SVCA as the floodplain would be avoided.

7. No Buildings or structures are currently proposed within the EP zone. An operational note should be included in the plans to confirm this for the life of the Pit.

8. Both Agricultural access lanes ways shall be allowed to remain at Phase 3's south and to the north west of Phase 2 lands. Should changes be proposed to these access lanes within the SVCA's Approximate Screening Area (see the SVCA's website) the SVCA should be contacted.

Fish Habitat and Threatened or Endangered Species

It has come to the attention of the SVCA that habitat of threatened or endangered species may be located in the area of the proposed development. It is the responsibility of the applicant to ensure the threatened

and endangered species have been appropriately addressed. Please contact the [Ministry of Natural Resources and Forestry (MNRF) for information on how to address this policy.

It has come to the attention of the SVCA that development proposed in association with this application may be in or adjacent to fish habitat. It is the responsibility of the applicant to ensure the fish habitat has been appropriately addressed. Please contact Fisheries and Oceans Canada (DFO) at 1-855-852-8320 or http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html for information on how to address this policy.

Conclusion

Once the SVCA has been provided with responses on the above noted comments, and plan changes we will continue with our review of this pit proposal. Should you have any questions, please do not hesitate to contact this office.

Yours Sincerely,

Erik Downing
Manager, Environmental Planning & Regulations
Saugeen Conservation

ED/
cc: Barbara Dobreen, SVCA Director, via e-mail
Clerk, Township of Southgate, via e-mail
Seana Richardson, Aggregates Technical Specialist, MNR, Guelph District, via email