



Via email

Mr. David Sisco
IBI Group
410 Albert Street
Suite 101
Waterloo, ON
N2L 3V3

February 24, 2021

Mr. Sisco:

**Re: Response to the AgPlan Limited letter dated February 22, 2021
Jackson Harvest Farms Aggregate Pit Application
Wilmot Township
Region of Waterloo**

Further to a review of the AgPlan Limited letter (February 22, 2021) regarding the DBH Soil Services Inc. letter (Jackson Harvest Farms AIA January 11, 2021), I provide the following.

As indicated in the AgPlan Limited letter, DBH Soil Services Inc. has provided comment in the AIA (January 11, 2021) regarding the soil rehabilitation process (Section 4.8). Within the Section 4.8 of the AIA, there is a section (Section 4.8.3) that describes the limitations of rehabilitation and indicates that the rehabilitation plan will follow the State-of-the-Art, best management practices for rehabilitation.

The DBH Soil Services Inc. AIA indicates in Section 8.3, 3rd paragraph, 2nd sentence, that a “final assessment of Canada Land Inventory (CLI) can only be completed after rehabilitation through the use of site-specific property yield analysis data from pre-extraction and post rehabilitation conditions”. It is also noted that this rehabilitation plan will be conducted to the present-day standards (State-of-the-Art, best management practices), to which all aggregate operations are required to adhere.

Specific to the AgPlan Limited comment that “No scientific evidence has been presented that the state-of-the-art rehabilitation process will probably result in meeting the test for soil capability outlined in the PPS (2020). Our discussions concerning this missing information resulted in the agreement that such evidence, either does not exist, or is proprietary (and therefore not available)”, we did indeed discuss in the virtual meeting, that such information is not available to the public (for Ontario soils). We also acknowledged that there have been studies completed by private interests (aggregate companies). It was noted that these private interest studies are generally of a proprietary nature and, again, are not available in the public domain. Therefore, no scientific evidence (specific to the measure of the restoration of soils to *substantially the same areas and same average soil capability for agriculture*) was located or identified for Ontario soils. Again, there



is no scientific evidence (for Ontario soils) in the public domain, that provides detail as to measuring the *same average capability for agriculture*. Further, as no additional information has been located or identified, no additional information has been presented as part of this AIA.

What has been presented is a State-of-the-Art, best management practices rehabilitation plan as is required by the PPS 2020.

I trust this information is helpful. Should you have any questions or concerns, please feel free to contact me at your earliest convenience at 519-578-9226.

Sincerely

DBH Soil Services Inc.

Dave Hodgson, P. Ag
President