



PLANNING, DEVELOPMENT
AND LEGISLATIVE SERVICES

150 Frederick Street, 8th Floor
Kitchener ON N2G 4J3 Canada
Telephone: 519-575-4400
TTY: 519-575-4608
Fax: 519-575-4449
www.regionofwaterloo.ca

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February 12, 2021

Andrew Martin
Manager of Planning / EDO
Township of Wilmot
60 Snyder's Road West
Baden, ON N3A 1A1
(sent via email: andrew.martin@wilmot.ca)

Dear Mr. Martin:

**Re: Zone Change Application 11/19 – Follow-Up Comments from
Hydrogeology and Source Water Protection
Jackson Harvest Farms Ltd. (Hallman Pit)
1894-1922 Witmer Road
Township of Wilmot**

Region of Waterloo staff previously reviewed the above-noted Zone Change Application (ZCA) submitted on behalf of Jackson Harvest Farms Ltd. for a proposed above-water table aggregate operation at municipal addresses 1894 to 1922 Witmer Road in the Township of Wilmot.

The application is intended to support the proponent's application to the Ministry of Natural Resources and Forestry (MNR) for a Category 3, Class 'A' License to Excavate Aggregate from Above-Water Table Pit under the Aggregate Resources Act (ARA). Regional staff reviewed the technical reports submitted with the zone change application with a focus on potential impacts to drinking water sources from the proposed aggregate pit as well as ensuring consistency of the technical work with the Region's Guidelines for Hydrogeological Assessments for Proposed Mineral Aggregate Resource Extraction Projects.

The Region initially provided comments on matters related to the protection of groundwater and surface water resources on February 7, 2020. In response, Harden Environmental Services Limited provided a report to the Region on July 13, 2020, and a covering letter from the proponent's planning consultant IBI Group. Regional staff provided a response outlining additional measures to be undertaken and technical details required, on November 18, 2020. Following this, Harden wrote to the Region on December 9, 2020.

Regional staff have since reviewed the latest response from Harden and note that it addresses the Region's remaining concerns related to hydrogeology and source water protection subject to the following comments.

The ARA Site Plan notes should be updated as noted in Harden's December 9, 2020 response. Regional staff accept the proposal by Harden to include a limited number of pages (1 to 11) from the Spills Response Plan in the site plan notes, as proposed by the proponent. The site plan notes should also reference the full spills plan. Regional staff request to be circulated on monitoring reports that are submitted to the MNRF for this site.

Annual water quality monitoring (for BTEX/PHCs) should be included on the ARA Site Plan notes as part of the ongoing groundwater monitoring program regardless of whether asphalt recycling is proposed. This should also be added to the ARA site plan. Regional staff are available to discuss the specifics of where monitoring should occur.

Summary

Based on the technical information provided, Regional staff support the proposed hydrogeological measures identified in the Harden reports and have no objections to the proposed zone change as it relates to matters of hydrogeology and source water protection provided that the above matters are addressed.

Yours truly,



David Welwood, MCIP, RPP
Principal Planner
dwelwood@regionofwaterloo.ca
(519) 503-3870

cc: David R. Sisco, IBI Group (vie email: david.sisco@ibigroup.com)