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July 27, 2022  
Via email

Becky Hillyer, Planner  
County of Grey  
595 9<sup>th</sup> Ave East  
Owen Sound, ON, N4K 3E3

Dear Ms. Hillyer,

Re: County of Grey Official Plan Amendment **42-07-090-OPA-16**, Township of Southgate  
Official Plan Amendment **OPA 1-22**, and Zoning By-law Amendment **C11-22**  
Hog's Back Pit, Part Lot 31 Concession 3, Township of Southgate  
H. Bye Construction Limited c/o Randall Bye

Grand River Conservation Authority (GRCA) staff has reviewed the above-noted applications to re-designate a portion of the subject lands to permit a mineral resource extraction use.

### **Recommendation**

The GRCA recommends deferral of this application to allow the applicant an opportunity to address the comments below.

### **Documents Reviewed by Staff**

Staff have reviewed the following documents submitted with this application:

- Hydrological Assessment Report (GSS Engineering Consultants Ltd., December 2021)
- Natural Environment Technical Report (SAAR Environmental Ltd., February 2022)
- Summary Statement & Planning Analysis for a Class A License Application under the Aggregate Resources Act (Cuesta Planning Consultants Inc., April 2022)

### **GRCA Comments**

GRCA has reviewed this application as per our delegated responsibility from the Province to represent provincial interests regarding natural hazards identified in Section 3.1 of the Provincial Policy Statement (PPS, 2020) and as a regulatory authority under Ontario Regulation 150/06. GRCA has also provided comments as per our MOU with the Township of Southgate and as a public body under the Planning Act as per our CA Board approved policies.

The subject lands contain the Keldon Swamp Provincially Significant Wetland (PSW) Complex and the regulated allowance to this feature.

It is understood that surface drainage from operational areas will be infiltrated into the pit floor and that no surface runoff is proposed to be directed toward the adjacent wetlands. To help determine an appropriate extraction setback from the wetland limits, a clear understanding of local catchments and seasonal wetland water balance is required to determine the extent to which the adjacent wetlands are currently sustained by direct precipitation, groundwater and/or surface water. A monthly water balance should also account for any surface runoff toward the

wetland when the ground is frozen. The Natural Environment Technical Report (NETR) does not provide a clear rationale to support the proposed 15-30 metre extraction setbacks.

It is our understanding that SAAR completed ground-truthing of PSW limits during a joint site inspection with SVCA staff for wetland limit discussion. The date of this site visit was not specified and it is unclear if and how wetland boundaries were delineated and surveyed. The vegetation community types illustrated in Figure 8 of the NETR do not correspond well with GRCA's wetland mapping. A site visit is requested in order to verify wetland limits within the Grand River watershed. We would ask that the wetland boundaries be delineated for verification by the GRCA. Once verified, the limits should be surveyed and a digital file of the wetland boundary submitted to the GRCA. We recommend that the limits of the PSW be clearly illustrated and labeled on all site plans.

### **Advisory Comments**

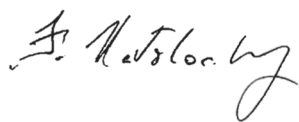
The GRCA owns property immediately east (Drew-Brook Tract) and west (Robson Tract) of the subject property. It has been noted that a portion of the extraction area will be within 15 metres of the GRCA owned lands immediately east of the proposed licenced area and proposed storage within 30 metres of the property boundary. Any comments relating to GRCA property would be issued under separate cover.

Additional wetland piezometers are recommended to assess water levels within the large wetland areas as extraction occurs. It is further recommended that the monitoring program extend throughout the life of the operation so that confirmatory water table elevations can be obtained as the pit develops.

Consistent with GRCA's 2022 approved fee schedule, this application is considered an above water table aggregate application within features of interest within 120 metres of the licence limit and the applicant will be invoiced in the amount of \$9,835 for the GRCA's review of this application.

Should you have any questions, please contact Chris Lorenz at 519-621-2763 ext. 2236 or [clorenz@grandriver.ca](mailto:clorenz@grandriver.ca).

Sincerely,



Fred Natolochny  
Supervisor of Resource Planning  
Grand River Conservation Authority

Copy: Clinton Stredwick (Township of Southgate) (via email)  
H. Bye Construction (via email)  
Cuesta Planning Consultants Inc. (via email)  
Michael Oberle (SVCA) (via email)

Kristy Ferguson (MNRF) (via email)