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Township of Puslinch
7404 Wellington Road 34
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www.puslinch.ca

June 19, 2025

Jennifer Adams
County Clerk
Wellington County
74 Woolwich Street
Guelph ON, N1H 3T9
VIA EMAIL:
jennifera@wellington.ca

RE: 9.3.3 Report ADM-2025-025 Reporting Out from Council Direction Update

Please be advised that Township of Puslinch Council, at its meeting held on June 18, 2025 considered the aforementioned topic and subsequent to discussion, Council resolved to withdrawn the Township's object to ERO Posting 025-0235.

Further, Council directed staff to submit the attached comments for the Ministry's consideration with respect to ERO 025-0476.

Please accept a copy of this correspondence for your information and consideration.

Sincerely,

Justine Brotherston
Municipal Clerk



June 5, 2025

Memorandum

To: Uche Eje, Ministry of Natural Resources, Aggregates Section

CC: Courtenay Hoytfox, Interim, CAO, Township of Puslinch
Justine Brotherston, Interim Deputy Clerk, Township of Puslinch

From: Kim Funk, Risk Management Inspector, Wellington Source Water Protection

RE: **ARA Site Plan Amendment (ERO # 025-0476) - 7034 Concession 2, Puslinch**

General

1. The following comments are related to the above referenced Aggregate Resource Act application (ERO # 025-0476). This is an application for an amendment to an existing Site Plan to increase the extraction area and change the sequence of extraction.
2. It is our understanding that this application is being considered in conjunction with ERO # 025-0235 which requested an amendment to an ARA Site Plan to permit below water table extraction. The supporting documentation for both applications is the same.
3. Given the above, we do not have additional comments beyond what we provided for ERO # 025-0235. We request that the Ministry consider the comments provided for the below water table extraction and include terms and conditions as appropriate for the increased extraction area proposal. Our previous comments are attached.

Sincerely,

June 5, 2025

Kim Funk, Risk Management Inspector

519-846-9691 ext 283

kfunk@centrewellington.ca

Attachments – May 15, 2025 Wellington Source Water Protection Comment Memo for ERO # 025-0235



May 15, 2025

Memorandum

To: Uche Eje, Ministry of Natural Resources, Aggregates Section

CC: Courtenay Hoytfox, Interim CAO, Township of Puslinch
Justine Brotherston, Interim Deputy Clerk, Township of Puslinch

From: Kim Funk, Risk Management Inspector, Wellington Source Water Protection

Reviewed by: Kyle Davis, Risk Management Official, Township of Puslinch

RE: ARA Site Plan Amendment (ERO # 025-0235) - 7034 Concession 2, Puslinch

General

1. The following comments are related to the above referenced Aggregate Resource Act application (ERO # 025-0235). This is an application for an amendment to an existing Site Plan to change the final depth of extraction from above the water table to below the water table in additional areas of the site.
2. These comments are provided in regards to the *Clean Water Act*, Grand River Source Protection Plan and source water protection implementation by Wellington Source Water Protection, a partnership of the Wellington County municipalities. These comments should not be construed as a hydrogeological, engineering, ecological or technical review of the application. These comments are strictly provided in regards to our municipality's role in implementing the *Clean Water Act* and municipal source water protection.

Summary of Source Protection Vulnerable Areas and Drinking Water Threats

The subject property is located in:

- a) a Significant Groundwater Recharge Area (SGRA);



- b) a draft Wellhead Protection Area Q (WHPA-Q) with a significant risk level; and
- c) a Highly Vulnerable Aquifer (HVA).

Attachments show the relevant mapping. Please note the subject property is not located in an Issue Contributing Area (ICA) or a Wellhead Protection Area for Quality.

- 3. Due to the site's location outside any water quality WHPA or ICA, and because the draft WHPA-Q is not yet in legal effect, there are no Significant Drinking Water Threat policies that currently apply.
- 4. Once the Wellhead Protection Area for Quantity is approved, there will be legally binding policies that will apply pertaining to consumptive water taking. Policy WC-MC-22.3 in the Wellington County Chapter of the Grand River Source Protection plan applies to Aggregate Resource Act applications in the WHPA-Q. Although not yet approved, we recommend that the Ministry consider the policy text referenced below and add terms and conditions to the ECA, where appropriate.

For reference, please see the policy wording WC-MC-22.3 below:

To ensure that any Consumptive Water Taking never becomes a significant drinking water threat, where this activity would be a significant drinking water threat as prescribed by the CWA, the MNRF, in consultation with the MECP, County, Municipalities, conservation authorities and licensees, shall consider when issuing new ARA licenses, and amendments to existing sites proposing to lower the depth of extraction from above to below the water table, the results and recommendations of the Tier 3 Study, water supply requirements for planned growth and prolonged drought outlined in Water Supply Master Plans and available data, reports and/or recommendations from monitoring programs established pursuant to policies in the County of Wellington Chapter of the Grand River Source Protection Plan, as part of the process under the ARA for approval of ARA licences, licence conditions and site plans based on the technical reports and information required under the ARA. To achieve this and ensure that the quantity of Municipal Water Supply will not be adversely impacted, MNRF shall consider establishing approval conditions in ARA licenses and site plans including but not limited to :

- a. operational controls;*

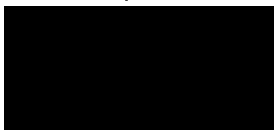


- b. measures that ensure that any below water extraction is protective of municipal drinking water supplies, including measures that restrict and/or limit extraction activities below the water table; and*
- c. groundwater and surface water monitoring related to municipal drinking water supplies.*

It is recommended that the Ministry consider this policy and add appropriate terms and conditions to the subject property ARA license to address potential impacts to the WHPA-Q and significant groundwater recharge areas.

5. Although significant drinking water threat polices do not currently apply for this application, the protection of the HVA, SGRA and the recharge function, is subject to the Planning Act. The Provincial Policy Statement (PPS) restricts development in or near sensitive groundwater features. The definition of development in the PPS includes “change in land use”. Section 6.6.9 of the County of Wellington Official Plan states that extraction below the water table only be allowed if impacts on the quality and quantity of water are minimal. It is recommended that impacts to the SGRA be considered in the approval of this site plan amendment and that the Ministry consider including requirements for monitoring, sampling and spill contingency planning.
6. A technical review of the application has been completed by Harden Environmental and their comments are attached as Appendix A. In reviewing these comments, it is our understanding that there is an existing well within the proposed extraction area that will need to be decommissioned prior to excavation. Beyond this, are no hydrogeological concerns related to this proposal and the current and/or proposed monitoring program is considered sufficient to document and address any adverse environmental impacts.

Sincerely,



May 15, 2025

Kim Funk, Risk Management Inspector
519-846-9691 ext 283
kfunk@centrewellington.ca



[REDACTED]

16-May-2025

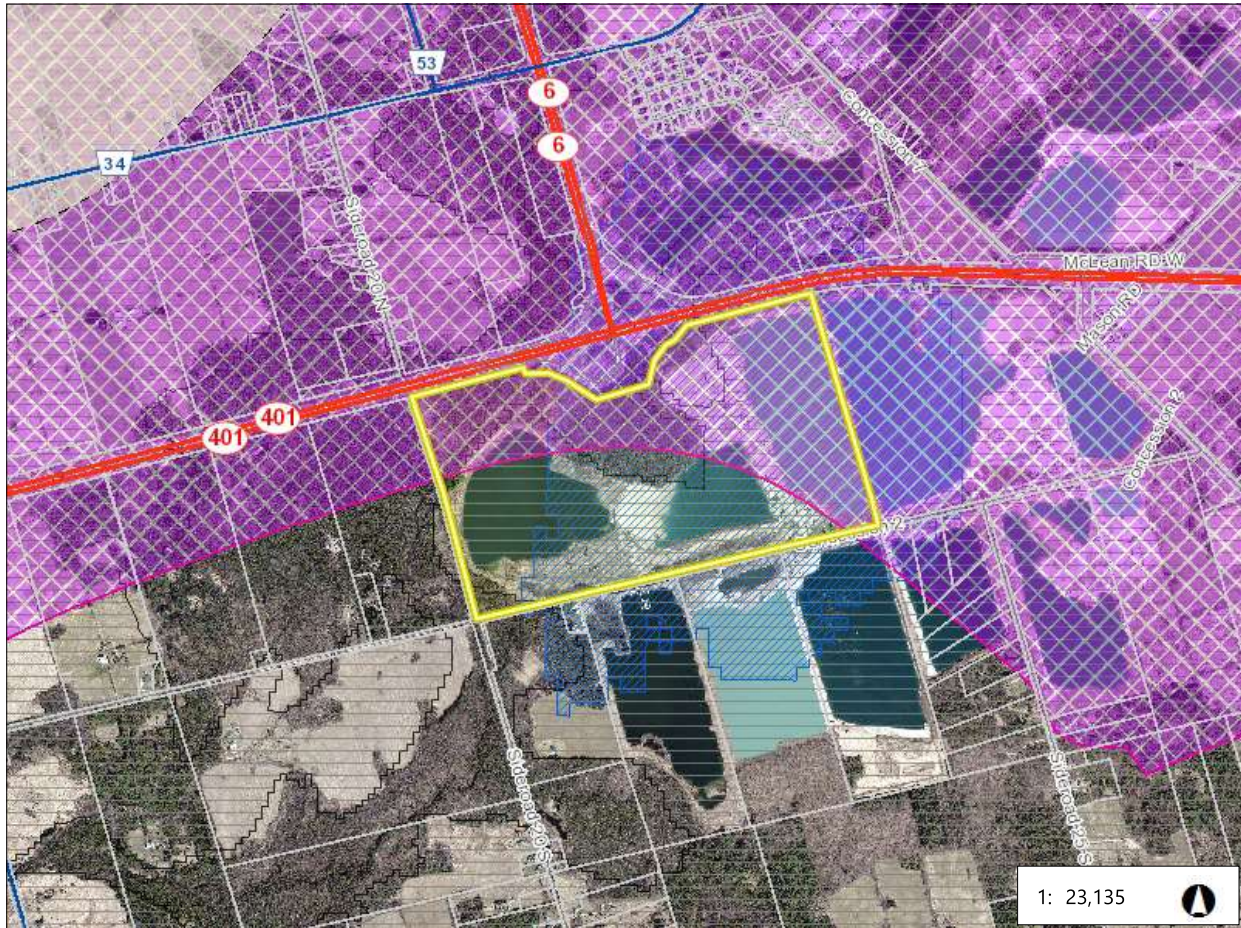
Kyle Davis, Risk Management Official

519-846-9691 ext 362

kdavis@centrewellington.ca

Attachments: WHPA Maps

Harden Environmental Comments dated April 29, 2025



Legend

- Parcels
- Roads - Small Scale
 - Local Road
 - County Road
 - Highway
- Well Locations
 - Existing
 - Proposed
- Wellhead Protection Area
 - A
 - B
 - C
 - D
- Vulnerability Score
 - 10
 - 8, D; 8; 8, C
 - 2, 4, 6 (A, B or C)
 - 2, 4, 6, D; 2, 4, D; 2, 4, 6 (D); 4, D; 6,
- WHPA Q1_Q2_Boundary
- WHPA Q1_Q2
 - Approved
 - Draft
- HVA
- SGRA
- RoadsLookup
- Prime Agriculture

1: 23,135



WGS_1984_Web_Mercator_Auxiliary_Sphere
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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes




SWP_Comments_Concession2_7034_ARA

Final Audit Report

2025-05-16

Created:	2025-05-15
By:	Kim Funk (kfunk@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAAXIhk03sNCAAsnw1-BWkoJ4by1-oEWBVv2

"SWP_Comments_Concession2_7034_ARA" History

-  Document created by Kim Funk (kfunk@centrewellington.ca)
2025-05-15 - 12:19:04 PM GMT
-  Document emailed to Kyle Davis (kdavis@centrewellington.ca) for signature
2025-05-15 - 12:19:09 PM GMT
-  Email viewed by Kyle Davis (kdavis@centrewellington.ca)
2025-05-16 - 9:55:42 PM GMT
-  Document e-signed by Kyle Davis (kdavis@centrewellington.ca)
Signature Date: 2025-05-16 - 10:30:53 PM GMT - Time Source: server
-  Agreement completed.
2025-05-16 - 10:30:53 PM GMT