

Saugeen Preservation Society Inc. – Formal Comment/Objection to Walker Aggregates Inc. Water-Taking Application
ERO Number: 025-0587
Ministry Reference Number: 3171-DGHJX5

We respectfully submit this formal comment/objection to Walker Aggregates Inc.’s Category 3 Permit to Take Water application for aggregate washing at the Redford Pit. We urge the Ministry to deny the application due to its potential for significant and irreversible environmental harm, lack of transparency, and inadequate technical justification.

1. Lack of Transparency and Public Notification

We are alarmed by the absence of proper public consultation. Despite the high-risk nature of this Category 3 application, no direct notification was provided to residents or landowners within the affected area. How will the applicant ensure our well water is not affected? We only became aware of this application by checking the ERO registry while monitoring for a separate expansion. This process lacks the transparency and diligence that Ontarians expect from applications with potentially significant environmental consequences.

2. Category 3 Risk – Highest Level of Environmental Concern

The Ministry classifies this application under Category 3, acknowledging the highest potential for unacceptable environmental impact or interference. This alone warrants exceptional scrutiny.

According to Canadian Mining Magazine, wash ponds present multiple risks, including:

- Water loss due to evaporation and seepage
- Contamination from poorly settled fines and sludge
- High maintenance demands and risk of liner failure
- Disruption of operations due to unreliable water recycling
- Long-term degradation of surrounding land

These risks are not hypothetical; they are inherent to the system proposed.

3. Insufficient Technical Detail and Questionable Data Sources

The hydrogeological report submitted in support of this application is insufficient, it lacks the necessary specificity and transparency. Key concerns include:

- No indication that wash ponds will be lined. The applicant's report provides no evidence of proposed liners or design specs.
- No defined location of the wash ponds on the property making it impossible to evaluate proximity to sensitive features and receptors.
- Wash ponds will be below the water table which does not meet the requirement of the current ARA licence.
- Monitoring wells used to justify the application are located on the planned expansion lands, not the currently licensed site.
- No water balance study has been completed.
- Statements of “no impact” are presented without evidence or explanation of methodology.

This is wholly inadequate for a Category 3 application. SPSI has submitted a Hydrogeological Report

peer reviewed by Lloyd Lemon, M.Sc., P.Geo. From **Lloyd Lemon Geoscience Consulting** you can find this review here:

<https://acrobat.adobe.com/id/urn:aid:sc:US:639d7f48-c08b-4e6a-a520-684c170198ad>

4. Highly Vulnerable Aquifer and Karst Geology

The pit lies entirely within a Highly Vulnerable Aquifer (HVA) and within a sensitive karstic dolostone area. The western region of Grey County, Ontario, is known for its karst geology, characterized by soluble bedrock like limestone and dolostone that has been shaped by the dissolution of water. This karst terrain includes features like sinkholes, caves, and fissures, which can create challenges for groundwater protection due to the potential for contaminants to enter the underground water supply. As shown in the Worthington-Ruland Karst Hydrogeological Study (Walkerton, 2001), this region is uniquely prone to rapid and unpredictable groundwater movement, including transport of contaminants. The consequences of even minor infiltration of wash pond effluent into the aquifer could be catastrophic for drinking water sources and surface water ecosystems.

5. Proximity to Significant Watercourses

The pit and the unlicensed expansion area where well data was collected sits between the Saugeen River and the Styx River, within 100 metres of the Saugeen at some points. The study claims “no impact” yet provides no modelled evidence of how the ponds or water taking will affect:

- River flows or seasonal recharge
- Sediment transport or turbidity
- Aquatic habitat and water temperatures
- Floodplain functions or wetland dynamics

This is unacceptable given the proximity to regulated hazard lands under the jurisdiction of the Saugeen Valley Conservation Authority (SVCA).

6. Cumulative Impacts Ignored

This application cannot be reviewed in isolation. Two adjacent properties have submitted new aggregate license applications:

- JT Excavating (ERO 019-6532)
- J.R. McLaughlin (ERO 019-7255)

All three footprints are contiguous, forming a large-scale industrial extraction zone within a sensitive riverine ecosystem. Approval of this water-taking sets a precedent for further applications, without any cumulative impact analysis on:

- Surface and groundwater flows
- Aquatic ecosystems
- Air and dust emissions
- Land use compatibility and economic impacts

The failure to assess cumulative impacts is a significant omission.

7. Community Trust and Historical Deception

In 2023, Walker installed monitoring in drinking water wells on nearby private properties, assuring

residents that “we will never take water.” This application directly contradicts those assurances. Using data from these wells, obtained under that premise, undermines trust and calls into question the integrity of the engagement process.

8. Environmental, Economic, and Public Interest

The Saugeen River is a vital resource, a drinking water source, a recreational asset, a wildlife corridor, and a driver of the local economy. Any degradation of its flow, quality, or ecology would have devastating and long-lasting effects on our community.

Approving this application, based on vague assertions, limited data, and a process that excluded the public, would set a dangerous precedent and risk long-term damage for short-term private gain.

Conclusion

This application:

- Fails to provide adequate technical evidence;
- Relies on flawed or misleading data;
- Misrepresents intentions to the community;
- Ignores cumulative impacts with two adjacent applications;
- Places critical water resources at risk.

For these reasons, we respectfully urge the Ministry to deny this Permit to Take Water under the current application.

Sincerely,

Saugeen Preservation Society Inc.

On behalf of concerned residents of West Grey and the surrounding watershed.