



Via email

Mr. Craig Laing
C.D. Aggregate Management Services

March 23, 2018

Mr. Laing:

**Re: Stovel and Associates Inc.
Agricultural Impact Assessment Peer Review Response – Review of Agricultural Impact Assessment, Violet Hill Pit – Town of Mono (February 6, 2018)
Part Lot 30, Concession 4 (EHS)
Part Lot 31, Concession 4 (EHS)
Part Lot 32, Concession 4 (EHS)
Township of Mono
County of Dufferin**

Further to our telephone conversations and email correspondence regarding the Stovel and Associates Inc. “Review of Agricultural Impact Assessment – Violet Hill Pit – Town of Mono (February 6, 2018)”, I provide the following response. I will address the Stovel and Associates Inc. comments as they are presented in their report.

The Stovel and Associates Inc. peer review is a letter format document comprising 2 pages, separated into 3 (three) sections. The first section identifies the purpose of the report, followed by Section 2 which summarizes outstanding issues, which are followed by Section 3, a summary of the findings.

Section 2 of the Stovel and Associates Inc. report provides a summary of “responses that remain as outstanding issues.

Point 1 – Copies of the soil data sheets were not included in the DBH AIA. DBH Soil Services Inc. has completed the soil survey portion of the AIA to the standards as presented in the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) document titled “Guidelines for Detailed Soil Surveys for Agricultural Land Use Planning” (http://www.omafra.gov.on.ca/english/landuse/facts/soil_survey.htm). Inspection locations and data have been provided as is stated within the guidelines. Typically, the field notes are not provided as they are often waterlogged, stained, muddy, dirty, ripped or otherwise damaged during the field investigations rendering them difficult to copy directly. A summary of the soils data is provided, as is the standard approach as used by experts in soil science/soil survey.

Point 2 - In response to the Stovel and Associates letter report it should be noted that I have reviewed the latest version of the Site Plans completed by Rollings Hyland Consulting (February 11, 2018 - Draft).

Point a) – interim agricultural rehabilitation. It is my understanding that the application of topsoil materials to the pit floor between the gravel extraction and the sand extraction phases is an erosion control exercise. The application of topsoil materials (thin lift or lightly applied) is to aid in the establishment of a seed bed. It is my understanding that these topsoil materials will be removed and reused in the remediation of the final pit contours. There will be no contamination of the topsoil materials as there is no opportunity for the topsoil materials to come in contact with any contaminants. The topsoil materials will come from either a preexisting berm (one constructed prior to that phase of extraction) or directly from topsoil stripping procedures.

Point b) – as stated in the Site Plans, the Agricultural Rehabilitation Sequence will be initiated on completion of the extraction process. As such, the sequence as is illustrated on Site Plan Page 3 of 5 (Progressive and Final Rehabilitation) is still appropriate. There will be no interim agricultural use between extraction phases.



Point c) – Similar to above point b, the cropping sequence and crop types recommendations are appropriate as there is no interim agricultural use between extraction phases.

Point d) – any other concerns or comments with the proposed Progressive Rehabilitation and Final Rehabilitation Plan. As stated above (points b and c), there is no interim agricultural uses between extraction phases, as such there are no additional concerns.

The Stovel and Associates Inc report states that DBH did not provide further commentary related to the potential for enhancing the overall potential capability of the site after extraction has been completed. DBH Soil Services Inc. has indicated that: the Site is located in a non-prime agricultural area (as identified and defined by the Town); the Canada Land Inventory is predominantly Class 4 (non-prime agricultural area); and that the site will be rehabilitated to an agricultural after use (as is required in the PPS). The overall agricultural potential (capability) will be improved over the existing capability by creating larger open areas (no fence or tree lines) of simple (> 50 m slope length) and gentle slopes. These slope conditions on the pit floor will allow for easier mechanized farming as compared to the steeper, short slopes that presently exist on the site. A direct comparison of Canada Land Inventory (CLI) is not possible until the final slopes have been established and the soils assessed to determine the depth of horizons and slope.

The Stovel peer review indicates that the DBH report should review the entrance and haul route and provide comment with respect to traffic. DBH has reviewed the Site Plans to determine the location of the site entrance. As stated previously, a traffic review study completed by C.C. Tatham & Associates Ltd. (draft January 19, 2015) provides detail on truck traffic to and from the proposed aggregate pit. With respect to the entrance on 3rd Line East, it has been identified that truck traffic will move north on 3rd Line East to Highway 89. Within this short distance one farm field was identified (southwest corner of Highway 89 and 3rd Line East). This field has been used for forage production. Field access is off Highway 89, a well-travelled corridor. There will be minimal traffic concerns on 3rd Line East as a result of use of 3rd Line East for access to the proposed pit.

The Stovel peer review indicates that the DBH report did not provide further details with respect to the location of mitigation measures to be used. Site Plan 4 of 5 (Sections) and 5 of 5 (Berm Phasing and Details) provide context as to the location, size (height and width) and construction of berms, fencing and vegetation (buffer planting) around the proposed pit. Further, Site Plan 2 of 5 (Operations) indicates the type, height and location of fencing to installed around the proposed pit (General Operational Note #5) and indicates that a sign will be posted on the license boundary regarding school bus safety (General Operational Note #19). Additional signage may be posted along the boundary fence.

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