



March 20, 2020

Seana Richardson
Aggregate Technical Specialist
Ministry of Natural Resources and Forestry
1 Stone Road West
Guelph ON N1G 4Y2

Jeremy Vink
Manager of Planning
Township of Woolwich
24 Church Street West, PO Box 158
Elmira ON N3B 2Z6

**Re: Application for Category 3 (Above Water) Licence – Shantz Station Pit
Official Plan Amendment and Zoning Bylaw Amendment
Capital Paving Inc.
Part Lots 81 and 82, German Company Tract, Township of Woolwich**

Dear Ms. Richardson and Mr. Vink,

Following our comments on the above-noted file on August 16, 2019, the Grand River Conservation Authority (GRCA) is in receipt of the response from MHBC dated January 13, 2020, as well as the Access Management Plan (MHBC / Riverstone Environmental / MTE, February 2020).

We can confirm comments 1, 3-5 and 8 from our previous letter have been satisfactorily addressed. We still have concerns regarding the analysis of hydrologic impacts to the Breslau Wetland Complex, and recommend that they are addressed prior to approval.

1. In regards to comment 2, the impact evaluation treats Wetland 1 as a single feature. However, Wetland 1 is a complex with discrete units and different hydrological and ecological characteristics. The Natural Environment Report (May 2019) identifies these units as the Northern Wetland and Northern Pond, which have an elevation difference of approximately 4 metres. The initial Hydrogeological Investigation (May 10, 2019) indicates that there is an upward hydraulic gradient in the Northern Wetland and a neutral hydraulic gradient in the Northern Pond.

These differences suggest that the distinct wetland units may react differently to the proposed changes in runoff and infiltration, and should not be evaluated as a single feature. There is concern that the reduction in runoff will lead to an altered hydroperiod and reduced water levels in the Northern Pond.

It is requested that the water balance and hydrologic changes be assessed separately for each wetland unit, in order to demonstrate that there will be no hydrological / ecological impacts on either wetland unit.

2. In regards to comments 6 and 7, the proposed buffer enhancements are generally supported. The following details are still requested:
 - a. Detailed landscape/restoration drawings should be provided showing the proposed enhancement measures, species mixes, planting densities, stock type, installation specifications and maintenance requirements.
 - b. The full scientific name should be provided for all species that are proposed for planting in the enhancement plans.
 - c. Basic design details for the proposed pond creation should show the depth and dimensions of the pond and the setback distance from the adjacent watercourse. The edge of the excavation for the pond should be a minimum of 15 metres from the watercourse to ensure there are no impacts on streambank stability or thermal influence on the watercourse. Erosion and sediment control measures associated with creating the pond should also be provided.

Additional Advisory Comments

3. The Northern Pond may also be more ecologically sensitive to changes in hydroperiod due to identified Significant Wildlife Habitat for Turtle Wintering Area, Turtle Nesting Area, Snapping Turtle Habitat and Amphibian Breeding Habitat (Wetlands). These habitat features are dependent on the current hydrologic conditions and abundant surface water during the appropriate times of the year.

We trust this information is of assistance. If you have any questions or require additional information, please contact me at 519-621-2763 ext. 2292 or theywood@grandriver.ca.

Sincerely,



Trevor Heywood
Resource Planner
Grand River Conservation Authority

- c.c. Melinda Thompson, Ministry of Natural Resources and Forestry
David Welwood and Jane Gurney, Region of Waterloo