



CRH Canada Group Inc.
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January 6, 2020

Dear Madame/Sir:

RE: CRH Canada Group Inc. Application for a Category 3 Class A Licence under the Aggregate Resources Act - North of Lot 80, Concession 1, W.P.R & Part of Original Road Allowance between lots 80 and 81, Concession 1, W.P.R, Township of Tiny, County of Simcoe

During the Aggregate Resources Act notification and consultation period for CRH Canada Group Inc.'s ("CRH") proposed Teedon Pit Extension we received an email from you with comments regarding our application. Your email did not include a mailing address to respond. As a result, the Ministry of Natural Resources and Forestry's position is that objections that cannot be responded to via registered mail are not considered valid. This requirement was clearly outlined on the notice that was sent with the commencement of the notification and consultation period for this application. Although your email is not an official objection under the Aggregate Resources Act, we are responding to you as a courtesy.

In response to the comments raised regarding the application process, this letter is intended to:

- Provide an update on the application;
- Provide a list of unresolved issues;
- Detail attempts to resolve the issues; and
- Provide recommendations in an effort to resolve outstanding concerns.

Application Process

In 2011, Cedarhurst Quarries and Crushing Limited submitted an Aggregate Resources Act application to extend the existing Teedon Pit. The application was deemed complete by the Ministry of Natural Resources and Forestry on April 13, 2012. The application was for a Category 3 Class A Licence, pit above water. The proposed licensed area was 42.6 ha and the extraction area was 39.0 ha.

In 2012, the Township of Tiny commissioned peer reviews of the natural environment, noise, and water resources reports. As a result of that review revisions were made to the application and the extraction area was reduced from 39 ha to 30 ha.



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Based on the revisions to the application in 2012, the Township's natural environment and noise peer reviewer comments were addressed. The Township's water resources peer reviewer also confirmed that an above water gravel pit which includes a requirement to maintain extraction 1.5 m above the water table will protect groundwater resources. The Township's peer reviewer requested additional monitoring wells to confirm the location of the water table.

In 2017, CRH acquired the Teedon Pit and proposed Teedon Pit Extension and assumed responsibility of the proposed application on behalf of Cedarhurst Quarries and Crushing Limited.

Dufferin Aggregates is a division of CRH. Dufferin Aggregates is a supplier of aggregates for the construction industry in Ontario. We operate more than 20 sites, including quarries, sand pits and distribution yards to supply crushed stone, sand and gravel, recycled concrete and recycled asphalt. We are proud to have supplied high quality aggregate for many infrastructure projects, as well as a variety of smaller projects for local landowners.

When CRH assumed responsibility of the application we commissioned updated technical reports and reviewed the application. As part of our review we agreed to install 7 additional monitoring wells in 2018 to better characterize the subsurface hydrogeological conditions and to allow additional monitoring of the water table. Currently there are a total of 11 wells that are monitored on the Teedon Pit and Extension properties.

Based on the updated technical reports the application was significantly reduced to address agency and public comments on the application. The license area was reduced to 15.3 ha and the extraction area reduced to 13.5 ha. This represents a 65 % reduction from the original 2011 application. See attached figure which illustrates the changes to the proposed application area.

On February 7, 2019 CRH commenced the formal agency and public notification period for the Aggregate Resources Act application to permit the Teedon Pit Extension. The final day to file objections was March 25, 2019. During that period there were 178 valid objections filed which included a return mailing address. This included objections from the Ministry of Natural Resources and Forestry and the Township of Tiny.

On August 15, 2019 CRH initiated a notification period to change the name of the applicant from Cedarhurst Quarries and Crushing Limited to CRH. This process concluded September 30, 2019. CRH received one (1) objection from a member of the public who is already an objector to the application.



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Since receiving your email, there has been on-going review by government agencies and additional technical analysis in an effort to address unresolved issues from both government agencies and members of the public. The following is a summary of items that CRH has completed in an effort to resolve issues:

- CRH has continued to meet with the Community Liaison Committee. This Committee consists of local residents and representatives from the Township of Tiny. The Committee discusses items related to the existing Teedon Pit and proposed Teedon Pit Extension.
- CRH set up a website to improve community access to information regarding the existing pit and proposed extension. The website includes:
 - Dufferin Aggregates Teedon Pit PTTW Renewal Application Report
 - Dufferin Aggregate Teedon Pit - 2017 Annual Monitoring Report
 - Community Liaison Committee Terms of Reference
 - Community Liaison Committee Meetings #1, 2, 3, 4, 5, 6 Agendas, Presentations and Minutes
 - Teedon Monitoring Well Logs 2018
 - Teedon Barometrically Compensated Water Level Data
 - Refurbished monitoring well schematic
 - A copy of all the updated 2019 technical reports (ARA Site Plans, Acoustical Impact Assessment, Level 1 and 2 Natural Environment Report, Hydrogeological Assessment, Aggregate Resources Act Summary Statement)
 - A copy of the archaeology assessment and Ministry of Tourism and Culture clearance letter
 - Teedon Pit Extension ARA Public Information Session Poster Boards
 - CRH's response to the Township of Tiny comments on the Aggregate Resources Act application dated June 20, 2019. This letter included a response to all outstanding peer review comments and the following attachments:
 - Category 1 Permit-to-take Water Renewal Application – Supporting Hydrologic and Hydrogeologic Study;
 - 2018 Domestic Well Survey;



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- Memorandum from Theakston Environmental dated May 2, 2019; and
- Memorandum from Goodban Ecological Consulting dated May 21, 2019

- The Township of Tiny peer review comments: noise (July 10, 2019), traffic (September 11, 2019), water resources (September 11, 2019), site operation (September 11, 2019) and natural environment (September 27, 2019). These comments were provided to CRH on October 29, 2019.

- CRH's response to the Township of Tiny peer review comments dated November 13, 2019. This response included a table responding to the peer review comments; memorandum prepared by Goodban Ecological Consulting Inc., 2018 and 2019 Surveys for Eastern Whip-poor-will, August 29, 2019; Traffic Impact Study prepared by C.F. Crozier & Associates Inc. October 4, 2019; Letter prepared by GHD regarding Professional Opinion Regarding Neighbouring Domestic Wells, September 23, 2019; Letter prepared by GHD regarding Response to Hydrogeological Comments # 1, #2 and 3f, September 23, 2019, and Sign-off from MECP regarding Whip-poor-will memo dated October 25, 2019.

- CRH responses to MNRF dated July 15, 2019, August 1, 2019 September 3, 2019 and November 7, 2019.

- MNRF email dated December 2, 2019 confirming that MNRF's issues have been addressed and that MNRF will prepare a letter withdrawing their objection.

As a result of the agency and Township peer review completed, we believe that all technical concerns related to the application have now been addressed.

Water Resources

Impacts to water resources and private wells are an unresolved issue for some members of the community. Concerns include impacts to the groundwater quality which the community considers some of the purest groundwater ever identified based on research by Dr. William Shotyk, impacts to the recharge function of the site, consideration of the Jagger Hims report, impacts on private and municipal wells, and concern regarding asphalt, fill and other contaminants on-site.

The community is requesting an immediate moratorium on the expansion of aggregate extraction in the Waverly Uplands, until the impacts on the groundwater flow systems are fully understood, and a cumulative impact study is completed.



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As summarized in the “Application Process” section of this letter, there have been extensive investigations on water resources and the groundwater flow systems are well understood.

CRH has made this technical information available to the community. This technical analysis demonstrates that water resources and wells will be not be adversely impacted by the proposed Teedon Pit Extension.

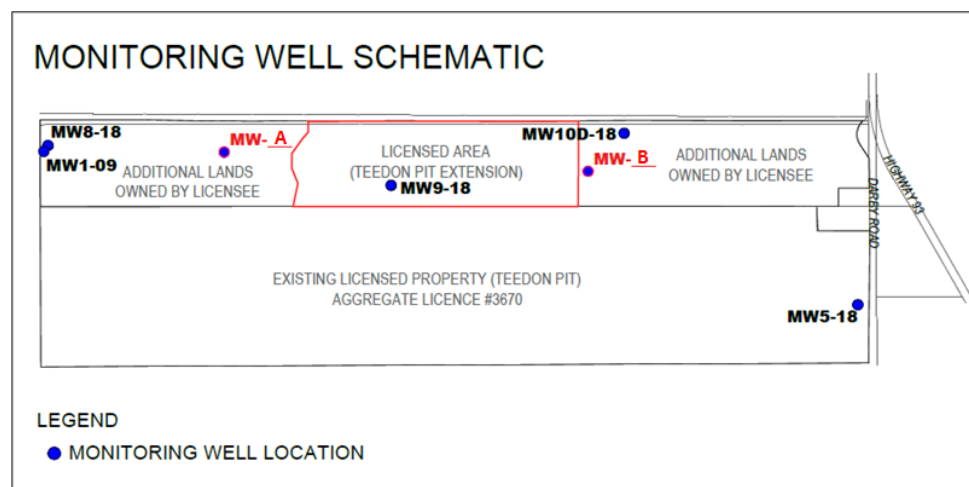
Based on the technical analysis completed, as well as the Aggregate Resources Act site plan requirements for the Teedon Pit Extension, the following is a summary of why the Teedon Pit Extension addresses Provincial, County and Township policies:

- An above water gravel pit is required to stay 1.5 m above the water table and does not interfere with the quality, quantity or flow of groundwater resources. As a result private wells will not be impacted and there will not be any cumulative impact on groundwater resources as a result of the proposed Teedon Pit Extension.
- The area of the Teedon Pit is outside of any municipal well fields and is outside the wellhead protection areas associated with these wells, therefore water supplies for the municipal well fields will not be impacted by the proposed Teedon Pit Extension. The closest municipal well is Wyevale, which is approximately 5 km to the northwest of the site.
- The proposed pit will reduce the amount of sand and gravel above the water table, however it doesn't stop the filtration process. The requirement to maintain extraction 1.5 m above the water table will still provide enough sand to filter surface water. Furthermore, no chemicals are used in the production of aggregate products and a world-wide literature review for the Ontario Ministry of Natural Resources and Forestry confirmed not a single instance of contamination caused by an above water gravel pit.
- An extensive groundwater monitoring program at the site is required to confirm that the pit remains above the water table and does not impact groundwater resources.
- Only clean inert fill is permitted on-site.
- No aggregate recycling or asphalt/concrete storage is permitted on the Teedon Pit Extension.

The Aggregate Resources Act site plans for the proposed Teedon Pit Extension have been updated to require the following conditions to be complied with to protect water resources and address outstanding concerns.



- One year prior to extraction commencing, two additional monitoring wells shall be installed. One between MW9-18 and MW8-18 and the second shall be installed along the eastern edge of the extraction area.
- MW1-09, MW8-18, MW10D-18, MW5-18, MW-A and MW-B shall be monitored monthly for water levels. The monitoring wells shall be equipped with automatic water level recorders (AWLR) data loggers.



- MW9-18 shall be monitored quarterly for water levels until it is removed for extraction.
- Extraction shall remain 1.5 metres above the established water table. In the event the water level data indicates the maximum depth of extraction is less than 1.5 metres above the established water table, the maximum depth of extraction shall be adjusted accordingly to maintain the 1.5 metre depth.
- The operator shall maintain a record of the monitoring results to verify that extraction remains 1.5m above the established water table.
- Fuel storage will be in above ground tanks certified in accordance with approved standards.
- Clean inert fill may be imported to facilitate the establishment of 3:1 (horizontal: vertical) slopes on the final pit faces. The operator must ensure that the material is tested at the source, before it is deposited on site, to ensure that the material meets the Ministry of Environment, Conservation and Park's criteria. Sampling results will be provided to the Ministry of Natural Resources and Forestry or the Ministry of the Environment, Conservation and Parks upon request.



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- The site is required to have a spills contingency plan in the unlikely event of spills. The site plan requires that all spills or release of contaminants must be immediately reported to the Ministry of the Environment, Conservation and Parks Spills Action Centre by telephone at 1-800-268-6060, and that any release of contaminants must be cleaned up immediately and transported to an approved waste disposal site by a licensed hauler. Any spill must be immediately contained to prevent further spread (i.e. excavate and contain oil soaked material in a loader bucket until disposal can be arranged).

Unrelated to the Teedon Pit Extension, an unresolved issue for the community is CRH's application to renew an existing Permit to Take Water for washing aggregate at the existing Teedon Pit. The community is concerned that the existing permits should be non-transferrable, that CRH is proposing to take six million litres of water per day, that turbidity monitors should be installed in area wells and that the aquifer will be permanently pumped. Concerns have also been raised by Wilf Ruland regarding intermittent siltation in some residential wells as a result of operations at the existing Teedon Pit.

The concerns related to CRH's application to renew the existing Permit to Take Water at the existing Teedon Pit is unrelated to the Teedon Pit Extension application. These applications relate to different properties and have different approval authorities.

The approval authority for the Permit to Take Water application under the Ontario Water Resources Act is the Ministry of Environment and Conservation Parks., I Based on the status of the Teedon Pit Extension application, the approval authority for the Planning Act application is the Township of Tiny and the Aggregate Resources Act is the Ministry of Natural Resources and Forestry (MNRF). Both of which are before the Local Planning Appeal Tribunal.

The Permit to Take Water application has no bearing on the proposed Teedon Pit Extension. The Teedon Pit Extension is an above water gravel pit and no aggregate washing or pumping of water is proposed at this site.

CRH has an existing Permit to Take Water at the Teedon Pit to wash aggregate. CRH has applied to renew this permit. The permit renewal application is consistent with the existing approved Permit and does not increase any permitted water takings.

Related to aggregate washing at the Teedon Pit concern has been raised that the washing operation has caused intermittent siltation in some residential wells.



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To date there have been three (3) domestic well surveys completed: the first in 2015 was completed by Alpha Environmental where 27 wells were included; the second in 2017, was conducted by GHD on behalf of CRH where 5 were included; and the third, in 2018 included 78 domestic well surveys which was also conducted by GHD on behalf of CRH.

To assess the specific concerns raised by five (5) landowners regarding the siltation of their wells CRH retained a licensed well contractor to assess the wells where landowner access was permitted and GHD completed additional technical analysis.

The Ministry of the Environment Conservation and Parks reviewed concerns from residents, including the report prepared by Wilf Ruland, and confirmed that the existing Teedon Pit did not cause intermittent siltation of surrounding wells.

The Ministry of Environment Conservation and Parks has attributed the domestic well quality issues to the shallow silty nature of the shallow aquifer where the well is located and / or poor well maintenance. There are several potential causes of silt in wells which include corrosion of the well casing, liner or screen causing holes; failure of the annular or casing seal; scaling of the well screen (iron bacteria); improper or lack of well maintenance; silt vs. scale from hard water (two separate issues); improper well design or construction (slot size might be too large and a sandpack might not be part of well construction); and insufficient well development after construction.

Location of the Proposed Pit

Locating a pit in this area, when other aggregate areas are available, is an unresolved issue for some members of the community. The community believes that all extraction operations in this aquifer should be shut down permanently and remediated to protect the aquifer, and that the establishment of a new mineral aggregate operation should not be considered until the Aggregate Resources Act review is complete and a master plan for aggregate resources has been established. In addition, the community feels there are too many residents that live in close proximity to the proposed pit.

The location of the proposed Teedon Pit Extension is where Provincial, County and Township policies plan for, and anticipate, a new mineral aggregate operation to be located.

The subject site is mapped by the Province as an area of "Primary" significance and contains some of the highest quality sand and gravel deposits within the



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County of Simcoe. The County of Simcoe Official Plan maps the site as a "High Potential Mineral Aggregate Resource" area and the Township of Tiny Official Plan maps the site as a "Mineral Aggregate Resources II" area. The intent of this mapping is to protect this important mineral aggregate resource for future use.

The Provincial Policy Statement requires that existing mineral aggregate operations be protected for continued use and potential expansion. The proposed Teedon Pit Extension is a proposed expansion to the existing pit and meets, or exceeds, all of the policy requirements, including policies to protect groundwater resources. The Provincial Policy Statement requires that the Township:

- Makes available as much aggregate as is realistically possible; and
- That a demonstration of need for mineral aggregate resources, including any type of supply / demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.

Taking into account that this area is protected for future extraction, and that the detailed technical analysis completed addresses all applicable government policies, it is concluded that this is an appropriate site to consider development of an above water gravel pit.

Noise and Air Impacts

An unresolved issue for some members of the community is noise and air impacts on surrounding neighbours as a result of the existing Teedon Pit and proposed extension.

As part of the application, a noise impact assessment was completed to ensure the pit would be designed to meet Provincial noise standards at surrounding neighbours. The noise report was completed in accordance with Provincial requirements and methodologies, and took into account noise from activities at the existing Teedon Pit and the proposed extension. The noise report was peer reviewed by an independent expert retained by the Township and this peer review was in agreement that Provincial guidelines can be satisfied.

The Aggregate Resources Act site plans for the extension require the following conditions to be implemented to ensure the operation meets Provincial noise guidelines at surrounding neighbours:

- Any construction equipment used to prepare the site, such as dozers, must comply with Ministry of Environment, Conservation and Parks publication NPC-115.



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- The portable crushing plant is to be situated within 30m of the western working face during the first lift, when within 200m of the western limit of extraction, in order to maximize sound attenuation.
- If required, the portable processing plant shall have an environmental compliance approval from the Ministry of Environment, Conservation and Parks.
- The genset trailer for the processing plant needs to be orientated with the exhaust discharge pointed away from the sensitive receptor at 80 Darby Road (approximately due east).
- Between the hours of 5:00 to 7:00 am only shipping is permitted and may include a maximum of 15 highways trucks per hour (30 truck trips) and a maximum of 1 shipping loader in combination with the existing Teedon Pit (Licence #3670).
- Between the hours of 7:00am and 7:00pm highway trucks are limited to 20 trucks per hour (40 passes per hour) in combination with the existing Teedon Pit (Licence # 3670).

To address the potential for dust impacts from mineral aggregate operations the Province has prescribed conditions that must be implemented for all new Aggregate Resources Act licenses. These requirements include:

- Dust shall be mitigated on-site.
- Water or another provincially approved dust suppressant will be applied to internal haul roads and processing areas as often as required to mitigate dust.
- Processing equipment will be equipped with dust suppressing or collection devices, where the equipment creates dust and is being operated within 300m of a sensitive receptor.

In addition to these requirements CRH has proposed the following requirement on the Aggregate Resources Act site plans for the proposed Teedon Pit Extension:

- Should it be determined that noise or air violations under the environmental protection act are occurring from pit operations, the portion of the operation relating to the impact shall cease and the operator shall implement further mitigation measures as determined by Ministry of Environment, Conservation and Parks. Operations relating to the impact may again commence upon written clearance from the Ministry of Environment, Conservation and Parks.



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Truck Traffic

Truck traffic is an unresolved issue for some members of the community. Concerns relate to the volume of trucks, noise and dust from trucks, and that haul trucks don't use required routes.

The proposed Teedon Pit Extension would utilize the existing approved entrance / exit and haul route for the Teedon Pit whereby trucks exiting the site travel north along Darby Road to Highway 93.

As a result of the Teedon Pit Extension there will be no increase in truck traffic permitted. The existing approved tonnage limit for the existing Teedon Pit is 600,000 tonnes per annum and the proposed tonnage limit for the Teedon Pit and Teedon Pit Extension is 600,000 tonnes, in combination, per annum.

A Traffic Impact Assessment has been completed at the request of the Township of Tiny. The report concluded:

- The Darby Road and Highway 93 intersection is currently operating at acceptable levels of service with minor delays and no capacity constraints.
- The Darby Road and Highway 93 intersection is expected to continue operating at acceptable levels of service with minor delays and no capacity constraints in the 20-year horizon.
- The available intersection sightlines on Highway 93 at the west approach (Darby Road) of the intersection exceed minimum sight distance requirements for both northbound and southbound movements.
- The observed collision rate at the Darby Road and Highway 93 intersection is low and does not indicate any collision trends that require attention.
- To improve heavy truck turning operations at Darby Road and Highway 93, the widening of Darby Road at the west approach of the intersection is recommended. This design would mitigate truck turning manoeuvrability issues and allow for simultaneous inbound and outbound truck turning movements. A functional design for the Highway 93 and Darby Road intersection improvements is included in the traffic report. CRH will be responsible for the costs to upgrade this section of the Darby Road.

In addition, CRH has committed:



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- To the Township to cover the costs to place "no stopping" signs along Darby Road to prevent trucks from stopping on Darby Road; and
- To add a requirement to the Aggregate Resources Act Site Plans to restrict the maximum number of trucks on-site to 20 trucks per hour (40 truck trips) between 7:00 am to 7:00 pm and prior to 7:00 am restrict the maximum number of trucks to 15 trucks per hour (30 truck trips).

Impact to the Natural Environment

An unresolved issue for some members of the community is the impact the proposed Teedon Pit Extension will have on the ecosystem and species.

As part of the update to the application in 2019, and to address concerns raised, a new Environmental Impact Assessment was completed for the site and surrounding area. Based on the recommendations of this study the extraction area was reduced from 30 ha to 13.5 to protect important natural heritage features.

The Environmental Impact Assessment concluded that based on the revised extraction footprint, operational plan, forest edge management plan and rehabilitation plan, the Teedon Pit Extension will have no negative effects on endangered and threatened species, significant woodlands and significant wildlife habitat. In addition, over time the significant woodland will increase in size by 2.7 ha based on the proposed rehabilitation plan.

Based on the recommendations of this study, the following is a summary of the items that were included on the Aggregate Resources Act Site Plans for the proposed Teedon Pit Extension:

- The site has been divided into 2 different tree clearing zones based. Tree cutting in Tree Clearing Zone '1' shall occur between November 1st and March 31st inclusive. This window for tree cutting avoids the active period for bats and the breeding bird season. Zone '1', encompasses the younger conifer plantations, young deciduous forest and shrub thickets on-site. Tree cutting in Tree Clearing zone '2' shall occur between November 1st and January 31st inclusive. This window for tree cutting avoids the active period for bats and the breeding bird season, including very early breeders. Zone '2', encompasses the more mature trees within the extraction footprint.
- Within three (3) years of licence issuance and prior to extraction commencing a 20m wide strip of trees shall be removed to pre-stress the new forest edge that will be created. This will promote the development of a forest edge that is adapted to an edge environment, with increased exposure to sunlight and wind.



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- In the 5m area between the fence and the extraction limit the new forest edge will be augmented by planting Red Oak (67%) and White Pine (33%) in gaps. Spacing will vary according to edge conditions at the time of planting, but shall be at least 3m apart. Planting Red Oak and White Pine in this area is intended to augment the new forest edge and to provide a potential native tree seed source for the adjacent future rehabilitation of the side slopes.
- Along the south side of the trail along the former road allowance, the forested area will be augmented by planting one or two rows of White Cedar and White Spruce on 2m spacing or greater. Planting one or two rows of conifers is intended to augment the buffer function of the northern strip of conifer plantation that is to be retained. This will help to buffer the mature hardwood forest located offsite to the north.
- Following completion of the Edge Management Plan a qualified ecologist or forester shall prepare a report documenting the implementation of the Forest Edge Management Plan. The report shall be submitted to the Ministry of Natural Resources and Forestry (MNR).
- Progressive and final rehabilitation of the disturbed area will be completed as extraction reaches final limits and depths. Final pit faces will be sloped at 3:1 or greater. The objective of the Rehabilitation Plan is to reforest the setback areas (0.5 ha) and the side slopes (11.4 ha) and the pit floor shall be rehabilitated to agricultural land (2.1 ha).
- A few years prior to tree planting commencing on the rehabilitated side slopes, a qualified ecologist assess the 5m setback and existing tree regeneration established through the Forest Edge Management Plan. Existing tree regeneration will be augmented by planting Red Oak (67%) and White Pine (33%) in gaps approximately 2m from the fence. Spacing of trees will vary according to the amount and quality of existing regeneration, but plantings shall be at least 3 m apart.
- On the rehabilitated side slopes stumps, logs and rock piles shall be incorporated into side slopes, to provide some habitat structure and variability. On the side slopes conifers are recommended as the initial plantings due to their ability to grow in exposed, hot, dry and nutrient-poor environments. Red Pine and Jack Pine are the preferred conifers for the initial planting at the site. Red Oak and White Pine are secondary species that will also be planted. After the secondary species are planted the side slopes should contain approximately the following proportions of trees: Red Pine 45%, Jack Pine 35%, Red Oak 10% and White Pine 10%. Wider-than-normal tree spacing is recommended. A target spacing of 2.4m between rows and 2.1 to 2.4m within rows is suitable, which totals approximately 1,600 to 1,900 trees per hectare.



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- Prior to surrender of the licence a qualified ecologist or forester shall prepare a report documenting:
 - a) the implementation of the reforestation plan;
 - b) to assess the need for any stand thinning to promote further native hardwood regeneration; and
 - c) to identify other management opportunities if appropriate. If required any further work shall be completed prior to the surrender of the licence.
 - d) The report shall be submitted to the Ministry of Natural Resources and Forestry (MNR).

Impact on Farmland

An unresolved issue for some members of the community is the impact the operation will have on farm land and the need to protect top classes of agricultural lands, including specialty crops.

From an agricultural perspective this site is ideal for an aggregate operation. The Province classifies agricultural soils as Class 1 to 7. Class 1 soils are the best, Class 7 soils are the worst and only Class 1 – 3 soils are considered prime agricultural land. The proposed Teedon Pit Extension contains Class 7 soils. The site does not contain prime agricultural soils, speciality crops and is not located within a prime agricultural area.

Interim Land Use / Rehabilitation

An unresolved issue for some members of the community is that the size of the pit is significant, that there are no timelines to complete a pit, and what should happen if the necessary resources are not in place to remediate the site at the end of the lifespan of the pit or if the pit operator should default.

Since the rate of extraction is based on market demand, aggregate operations do not include a specified timeline / end date, since it would be inappropriate to surrender a license while there is still aggregate remaining on-site.

To ensure aggregate operations transition from an active pit to another long term use, the requirement to complete progressive and final rehabilitation of a site is a legislative requirement that an operator must comply with.

Rehabilitation of this site will be progressive, and the rehabilitation plan for the site focuses on rehabilitation back to a natural heritage and agricultural end use.



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The Aggregate Resources Act site plans for the proposed Teedon Pit Extension include specific rehabilitation requirements that must be met. CRH is committed to, and required by the Aggregate Resources Act, to complete the rehabilitation of the site as per the Aggregate Resource Act Site Plans. If progressive rehabilitation is not being completed in accordance with the site plans, the Ministry of Natural Resources and Forestry has the enforcement tools to ensure that rehabilitation is completed.

Should a pit operator default, the aggregate industry has created an existing fund, managed by The Ontario Aggregate Resources Corporation, which is used to ensure the site is rehabilitated.

In summary there are legislative, enforcement and financial tools already in place to ensure that any site currently licensed under the Aggregate Resources Act will be rehabilitated.

Section 12 of the Aggregate Resources Act

Compliance with Section 12 of the Aggregate Resources Act is an unresolved issue for some members of the community.

Section 12 of the Aggregate Resources Act requires the Minister or the Local Planning Appeal Tribunal, as the case may be, to have regard to: the effect of the operation of the pit or quarry on the environment; the effect of the operation of the pit or quarry on nearby communities; any comments provided by a municipality in which the site is located; the suitability of the progressive rehabilitation plans for the site; any possible effects on ground and surface water resources including drinking water sources; any possible effects of the operation of the pit or quarry on agricultural resources; any planning and land use considerations; the main haulage routes and proposed truck traffic to and from the site; the quality and quantity of the aggregate on the site; the applicant's history of compliance with this Act and the regulations, if a license for permit has previously been issued to the applicant under this Act of a predecessor of this Act, and; and other such matters as are considered appropriate.

The updated technical reports submitted in 2019 and posted on CRH's website address the requirements of Section 12 of the Aggregate Resources Act. MNR has reviewed the application and confirmed that they have no outstanding concerns related to the Teedon Pit Extension. As part of this process, CRH also completed all the technical reports required by the Township and responded to all comments provided by the Township and the review agencies. In addition to the technical review of the application, the Aggregate Resources Act requires



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consideration of CRH's compliance history with the Act. CRH operates several sites in Ontario in compliance with the Aggregate Resources Act and does not have any sites that have been suspended or revoked due to non-compliance. If a compliance issue occurs, CRH works expeditiously to address the issue to the satisfaction of the regulatory agency.

Property Values

An unresolved issue for some members of the community is the potential for the Teedon Pit Extension to negatively impact the value of nearby properties.

The proposed Teedon Pit Extension is located in a rural area and aggregate operations are already an existing use in the area. In addition, this site is specifically protected for its potential to become a mineral aggregate operation in accordance with Provincial, County and Township policies.

To protect surrounding properties and sensitive receptors from adverse impact, the operation has been designed with appropriate mitigation, monitoring, and operational controls.

CRH is responsible for ensuring that the proposed pit operation does not result in adverse impacts on surrounding properties and their uses. Accordingly, the design of the pit incorporates measures to mitigate impacts related to, noise, air quality, and water quantity/quality in order to achieve Provincial Standards and Guidelines established to protect surrounding land uses.

These measures have been incorporated into the Aggregate Resources Act site plan for the Teedon Pit Extension, thereby becoming legally binding on the licensee, ensuring that the pit will be operated and impacts controlled, so that use and enjoyment of properties is not unreasonably affected. The proposed operation is well planned and designed, and will be managed and controlled to mitigate off-site impacts.

Duty to Consult First Nations

An unresolved issue for some members of the community is the requirement for the Duty to Consult with First Nations.

The proposal falls within Treaty 16, 1815 and MNRF required CRH to provide the Beausoleil First Nation, Mnjikaning First Nation (Rama), Chippewas of Georgina Island First Nation and Georgian Bay Metis Council notification and information regarding the proposed application. CRH has provided notification and information regarding the proposed application. CRH has attempted to consult



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and continues to be available to discuss any aspect of the application with the these First Nation communities.

Recycled Aggregates

An unresolved issue for some members of the community is the need to establish this new source of aggregate when opportunities for the development and use of recycled products exist. The community is also concerned that CRH's is proposing to recycle aggregate at the Teedon Pit Extension.

CRH is proud to recycle concrete and asphalt at various operations in Ontario. CRH will continue to recycle aggregates at the existing Teedon Pit in accordance with existing approvals. At the request of the public and the Township aggregate recycling and storage of recycled aggregates will not be permitted at the Teedon Pit Extension.

Despite the use of recycled aggregates in Ontario approximately 90 % is still required to be supplied from extraction at mineral aggregate operations to meet demand and quality specifications for infrastructure projects. The use of recycled aggregate is being maximized however recycled aggregates:

- Cannot meet the total demand of aggregate that is generated by the public; and
- Are of lower quality that does not meet specification requirements to be used in most construction projects.

Based on the established need for new mineral aggregate resources, the Provincial Policy Statement requires that the Township:

- Makes available as much aggregate as is realistically possible; and
- That a demonstration of need for mineral aggregate resources, including any type of supply / demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.

Impact on Tourism

An unresolved issue for some members of the community is gravel pits are unattractive and do not attract tourism.



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The proposed Teedon Pit Extension is not located within a tourist area and is well setback from Darby Road and screened by existing forested area that will be maintained.

Cost to Taxpayers

An unresolved issue for some members of the community is that the real cost to taxpayers is not being recovered, road maintenance costs, and that aggregate companies are not committed to local communities and propagate a boom/bust economic cycle while shouldering as little of the tax burden as possible.

Mineral aggregate operations do not place a burden on taxpayers since they are required to pay a levy for every tonne of aggregate that is shipped to market and pay municipal taxes. The aggregate industry also does not propagate a boom / bust economic cycle, nor does it create the demand for its product. Aggregates are a required resource that is used by the public and private sector to complete construction and infrastructure projects.

For every tonne of aggregate that is shipped to market, the Aggregate Resources Act requires that 19.8 cents per tonne (2017 rate - this rate is subject to annual indexation adjustments) be paid to the Province, County and Township and this levy will apply to the Teedon Pit Extension if approved.

The Teedon Pit Extension contains approximately 10 million tonnes of aggregate on-site, which equates to \$1,980,000 in levies to the government over the life of the operation. This is in addition to the increase in taxes that will be paid to the Township during active extraction as a result of the land use change from rural to extractive industrial. Taxpayers also benefit from having multiple sources of aggregate close to the consumer since this reduces the cost of aggregate that is required for local infrastructure projects and homeowner projects.

Oversight & Enforcement

An unresolved concern for some members of the community is the ability for the government to regulate the site and who is responsible for different aspects of the operation, including the protection of water resources.

It is our responsibility to operate our site in accordance with applicable laws and regulation. If you have a concern with the operation, we encourage you to discuss your concern with us. In the event that an issue is not resolved to your satisfaction, the following is a list of the regulatory agencies that have oversight over different aspects of the operation:



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- Compliance with the Aggregate Resources Act site plan requirements: MNRF
- Compliance with our Permit to Take Water for the wash plant at the existing Teedon Pit: MECP
- Protection of water resources and impacts to wells: MECP
- Air and Noise: MNRF and MECP
- Hours of operation: MNRF
- Traffic: Police, Ministry of Transportation and the Township of Tiny (truck stopping on Darby Road)

Adequate Opportunity for Public Review

An unresolved issue for some members of the community is lack of opportunity for public review and that the format and time of the Aggregate Resources Act Open House was not appropriate.

This application has been submitted since 2011 and there has been adequate opportunity for public review and input. The agency and Township peer review process took into consideration public comments that were received regarding the application. Based on this review, the license area was reduced to 15.3 ha and the extraction area reduced to 13.5 ha. This represents a 65 % reduction from the original 2011 application. See attached figure which illustrates the changes to the proposed application area. The following examples of public involvement in the application:

- A Township of Tiny public meeting for the Planning Act applications was held on January 26, 2015 and public comments and delegations were considered.
- On February 7, 2019 CRH commenced the formal agency and public notification period for the Aggregate Resources Act application to permit the Teedon Pit Extension. The final day to file objections was March 25, 2019. During that period there were 178 valid objections filed which included a return mailing address. This included 176 public objectors and objections from the Ministry of Natural Resources and Forestry and the Township of Tiny.
- Public notification of the application was published in the Le Goût de Vivre and Midland Mirror on February 7, 2019. The newspaper notification included some detail on the application, the date and location of the public information session that was held on March 5, 2019 and the deadline to provide an objection. In addition to the newspaper publication, landowners within 750 metres of the



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property were provided with direct notice. The ARA only requires landowner within 120 metres of the proposed licence boundary to be notified. There were also two sign(s) posted on-site regarding the public information session and the timelines to provide comments.

- An Aggregate Resources Act Information Session for the Aggregate Resources Act application on March 5, 2019. There is no prescribed format for the information session. The applicant is required to hold the information session between day 20 and 35 of the notification and consultation period. CRH believes the open house format allows individuals the opportunity to speak with the project consultants regarding specific issues related to their properties which typically can't be done during a Township Council type meeting. It has been CRH's experience that holding the information session between 4pm and 7pm provides adequate opportunity for individuals to attend.
- The EBR posting for the Teedon Pit Extension was listed for public comment on March 20, 2019 and concluded on May 6, 2019.
- On August 15, 2019 CRH also initiated a notification period to change the applicant from Cedarhurst Quarries and Crushing Limited to CRH. This process concluded September 30, 2019. CRH received 1 objection from a member of the public that is already an objector to the application.
- The EBR posting for the change in applicant for the Teedon Pit Extension was listed for public comment on October 10, 2019 and concluded on November 25, 2019.
- CRH set-up a Community Liaison Committee. This Committee consists of local residents and representatives from the Township of Tiny. The Committee has met 8 times and discusses items related to the existing Teedon Pit and proposed Extension.
- CRH set up a website to improve community access to information regarding the existing pit and proposed extension. The website includes the documents listed in the "Application Process" section of this letter.

Overall, CRH believes there has been ample opportunity for public input on the application and this process has significantly exceeded legislative requirements.

Next Steps

To date, the Planning Act applications to permit the proposed Teedon Pit Extension (Township of Tiny Official Plan and Zoning By-law amendment) have been referred to the Local Planning Appeal Tribunal for a hearing. CRH has asked the tribunal to delay scheduling the hearing to allow time for the Aggregate Resources Act process to conclude.



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If there are any remaining objections to the Aggregate Resources Act application after the objector response period, CRH will request that the Ministry of Natural Resources and Forestry refer the application to the Local Planning Appeal Tribunal for a hearing to resolve the relevant outstanding issues. Both the Planning Act and Aggregate Resources Act applications would be considered at the same hearing since they deal with similar subject matters.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J Ferri'.

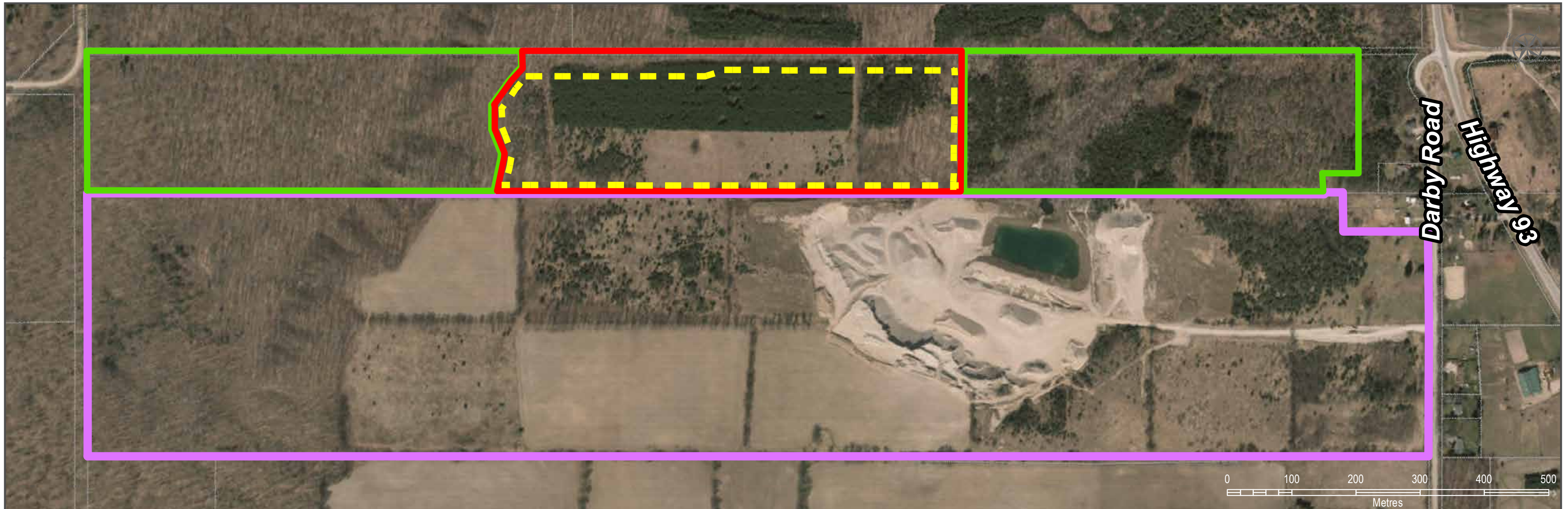
Jessica Ferri, MCIP, RPP
Manager, Policy and Planning
CRH Canada Group Inc.

Cc: Robert Herbst- MNRF
Brian Zeman- MHBC

Attachments:History of Application Figure

HISTORY OF APPLICATION

2018 CURRENT PROPOSAL







2013 REVISED PROPOSAL



2011 ORIGINAL PROPOSAL



Legend

-  EXISTING TEEDON PIT
-  PROPOSED TEEDON PIT EXTENSION LICENSED BOUNDARY
-  PROPOSED TEEDON PIT EXTENSION EXTRACTION AREA
-  ADDITIONAL LANDS OWNED BY CRH - ENVIRONMENTAL BUFFER (NO EXTRACTION)

SINCE 2011 APPLICATION:

64% REDUCTION IN LICENSED AREA
65% REDUCTION IN EXTRACTION AREA

	LICENSED AREA	EXTRACTION AREA
2011	42.6 ha	39.0 ha
2013	42.6 ha	30.0 ha
2018	15.3 ha	13.5 ha