

November 21, 2008



Mr. Mark Dorfman
Mark L. Dorfman, Planner Inc.
145 Columbia Street West
Waterloo, ON N2L 3L2

Dear Mr. Dorfman,

Re: Peer Review of the Rockfort Quarry Visual Impact Assessment Report for the Town of Caledon

1.0 Introduction

We have prepared the peer evaluation for the visual assessment of the Rockfort Quarry Application in the Town of Caledon. This work includes a review of the site from the municipal roads, review of background reports, research related to visual assessment methodology, review of previous studies and file memos and correspondence, along with submissions of information from the proponent's consultant as relevant to visual assessment matters.

The purpose of the peer review is to provide support to the Town of Caledon in reviewing the technical completeness of the proponent's assessment of the visual resources for the Rockfort Quarry subject area; compliance with applicable Official Plan policies; and an evaluation from a professional perspective of the methodology, conclusions and mitigation measures identified in the proposed plans.

Visual Assessment

Concerns over visual impacts were noted in the 1998 and 2001 cultural heritage peer review letters. Visual impacts have been assessed by JDCL consultants (MHBC, Wendy Shearer, July 2008) in response to peer review comments and the policies of the Caledon Official Plan (Section 5.11.2.4.2 (e) and 5.11.2.4.11), as incorporated through OPA 161, requiring a visual impact study for aggregate resource extraction proposals. The findings and conclusions of the Visual Impact Report are discussed in this peer review. Any issues related to the cultural heritage resources are addressed as part of a separate peer review report (Andre Scheinman Heritage Preservation Services with ENVision - DRAFT September 28, 2008).

It is acknowledged through previous technical studies that there are significant views as a result of the cultural heritage resources on the subject lands and that these views contribute to the scenic character of the area. In this peer review, we have also considered the contextual visual resources that are part of the Niagara Escarpment because the property is located on the boundary of the Niagara Escarpment Plan (NEP) and the proposed haul routes traverse the NEP area.

2.0 Background Documents

The peer review included a review of the following documents prepared by both James Dick Construction Limited (JDCL) and the Town of Caledon consultants.

JDCL Reports

- *Visual Impact Report Rockfort Quarry* (MHBC, Wendy Shearer Landscape Architect Limited, July 2008)
- *Planning and Justification Report – James Dick Construction Limited*, (MHBC, July 2008)
- *Rockfort Quarry Site Plans* (July 2008)
 - Drawing 1 – Existing Features 1 of 5, prepared by MHBC dated July 30, 2008
 - Drawing 2 – Operational Plan 2 of 5 Details, prepared by MHBC dated July 30, 2008
 - Drawing 3 – Operations Plan 3 of 5 Phasing and Notes, prepared by MHBC dated July 30, 2008
 - Drawing 4 – Final Rehabilitation Plan 4 of 5, prepared by MHBC dated July 30, 2008
 - Drawing 5 – Cross-Sections 5 of 5, prepared by MHBC dated July 30, 2008

Town of Caledon: Reports and Policies

- *Rockside Cultural Heritage Landscape Study* (André Scheinman Heritage Preservation Consultant, with ENVision – The Hough Group, Draft report 2004, Final report 2006)
- *Town of Caledon Inventory of Cultural Heritage Landscapes* (André Scheinman Heritage Preservation Consultant, with ENVision – The Hough Group, 2006)
- *Town of Caledon Official Plan*
 - Section 3.2: Cultural Heritage Conservation
 - Section 5.11.2.4.2 (e) and 5.11.2.4.11) Mineral Resources

Niagara Escarpment Commission

- *Niagara Escarpment Commission Visual Assessment Guidelines*, July 17, 2008
- *Landscape Evaluation Study – Niagara Escarpment Planning Area*
Niagara Escarpment Commission, April 1976
- *Landscape Evaluation Study – Map 4*
Niagara Escarpment Commission, 2005

3.0 *Rockfort Quarry Visual Impact Report, (MHBC, Wendy Shearer, July 2008)*

The report was initiated to respond to peer review comments (including the Rockside Cultural Heritage Landscape Study, (Scheinman, ENVision, 2006) and the policies of

the Caledon Official Plan (Section 5.11.2.4.2 (e) and 5.11.2.4.11) as set out in OPA 161, requiring a visual impact study for aggregate resource extraction proposals.

The 2008 Visual Impact Report considers the documentation and findings of the following reports:

- Cultural Heritage Landscape Assessment Report, Rockfort Quarry (Dillon Consulting, October 1999)
- Rockfort Quarry Site Documentation (Unterman McPhail Cuming Associates, and Archaeological Services Inc.)
- Rockside Cultural Heritage Landscape Study (André Scheinman Heritage Preservation Consultant, with ENVision – The Hough Group, Draft report 2004, Final report June 2006)
- Cultural Heritage Landscape Analysis Report, Rockfort Quarry (Unterman McPhail Associates, May 2005)

COMMENTS

The Visual Impact Report describes the visual resources of the property, takes into account the cultural heritage landscape that is documented for the area and assesses the change in visual resources, specifically CHL resources, as a result of the operations.

Comment: The report does not evaluate the off-site visual resources, particularly the impact on municipal roads that will be altered to facilitate the haul routes.

The report acknowledges that views into the site are an important part of the property's heritage value, and a key component of the report is the mitigation of the changes in views of the property from the neighbouring properties and the adjacent roads. The report also acknowledges that the property is currently well screened from views from the north, south and east because vegetation along those property boundaries filters views into the proposed quarry site. The report identifies that mitigation is required for views from the west, specifically from Winston Churchill Boulevard, and acknowledges that views will change over time as vegetation grows and as the active extraction areas expand towards the municipal roads.

The Visual Impact Report comments that the local landscape is changing as a result of new residential properties and suggests that the proposed quarry operation is part of a normal evolving landscape.

Comment: This conclusion does not acknowledge that the magnitude of the proposed change is not 'normal' because the quarry operation involves 51 hectares of extraction area and extensive berming to address acoustic impacts. This change is a significant industrial operation that is beyond the limits of a 'normally' evolving rural landscape where incremental changes in the fabric of the community occur.

The focus of the Visual Assessment Report is the identification and assessment of view locations from public roads and individual residential properties into the site. This includes key plans, view locations of photos, cross sections showing relative elevations for selected views, and tables describing how views are impacted as the quarry limits expand. The analysis identifies representative views along Winston Churchill Boulevard because the visual impact of the proposed quarry will be the most noticeable from the road corridor.

Comment: The report does not evaluate the off-site visual impacts such as the change to the Olde Base Line, specifically in the vicinity of the entrance to the quarry operation where there will be road improvements required to facilitate haul truck traffic (right turn access into the quarry, queuing on the shoulder of the road, widened lanes for left turn egress). This location is sensitive from a visual impact perspective because it is located on the boundary of the NEP area, in an area that is considered to be 'Attractive'¹.

The Visual Impact Assessment report ranks views as having low, medium or high change as a result of the quarry operation and the ranking is provided for the five stages of the operation.

- No change – existing views are very limited; therefore, changes on the site should not be noticeable
- Low Change – change occurs on a portion of the site that is well screened from view location or is in the distance (background view)
- Medium change – visible or partially visible but set back from viewer location (middle of view)
- High Change – noticeable or very noticeable because it is in the foreground and clearly visible

Comment: This ranking system identifies the degree of change but does not indicate if this correlates to the degree of impact and the acceptability of that impact.

The Visual Impact Assessment report states that the site is conducive to the development of an effectively screened quarry operation for the following reasons:

- the processing plant is well set back from the perimeter of the property
- the southeast portion of the site is at a lower elevation and the removal of quarry materials will lower the processing plant site further
- Existing vegetation forms a screen to the north, east and south
- Proposal introduces a perimeter tree screen in association with acoustic berms along Winston Churchill Boulevard to augment existing roadside vegetation
- Highly visible locations such as the west boundary can be mitigated with berming and new planting, and some elements of the CHL that are located at the perimeter can be preserved

¹ Landscape Evaluation Study – Map 4 Niagara Escarpment Plan

- Retains farm fences, the Rockfort Farm complex, the drumlin landform feature and the landmark deciduous tree
- Mitigation includes retaining and integrating existing features in the perimeter acoustic berms – augmenting fencerows, introducing split rail fences on the berms, preserving and replicating stone gates, relocating Westerfield stone shed and house in the rehabilitation plan.

Comment: The Visual Impact Assessment report does not provide the supporting analysis to prove the conclusion that the quarry operation will be effectively screened and that the mitigation techniques will be effective during the life of the operation. The proponent has not provided:

- visibility mapping that describes where the elements of the quarry operation will be visible from (product piles and truck staging areas)
- Acceptable cross-sections that describe the effectiveness of the mitigation. The cross sections should be drawn without vertical exaggeration
- The analysis does not provide data on the elevation (specific height) and relationship to existing grade of the berming that is required to screen the product stockpiles to demonstrate that the berming is effective
- cross-sections do not depict the Phase 1 plant location and address the visual impact in the early stages of the operations when tree planting to create visual screens will be the least effective

The other issues that need to be addressed include:

- Determining what the visual impact will be from the Olde Base Line resulting from reconstruction to accommodate access and egress lanes (loss of mature vegetation on the public right-of-way)
- Evaluating the visual impact of road improvements on the fencerows on either the quarry site or the public right-of-way. A significant portion of the fencerows are on the public right-of-way and may be impacted as a consequence of road improvements. Other on-site features that are proposed for preservation will be overwhelmed by the quarry operation and potentially at risk of damage/degradation from the quarry operations.
- Determining the significance of the long pastoral views that are lost as a consequence of the construction of the soil berms in close proximity to the road corridor (impede long views to the CHL)
- Identifying if there should be setbacks to protect the visual integrity of the significant cultural heritage resources that are to remain ‘in-situ’

The quarry proposal relies on the placement of soil berms to provide the dual role of mitigating undesirable noise and views. The location of the berms is described in the Operations Overview - Proposed Rockfort Quarry Figure 2, Planning and Justification Report prepared by MHBC dated July 2008. The perimeter berms are illustrated as

continuous; however, the height of the berms is not specified. They are described as '*berm height will vary to meet minimum geodetic elevations*'. The overall height is noted on the Acoustic Berm Detail Figure 3, Planning and Justification Report prepared by MHBC dated July 2008, as ranging from 2.0 m height to 10.0 m height. The depth of the berm is not identified. The side slopes vary from 1:1 to 2:1 profile and are revegetated to mimic fencerows. Armourstone is used at the base of the berms as a retaining wall in the vicinity of existing mature trees for tree preservation purposes.

Comment: There are a number of visual impact concerns related to the implementation of the berms:

- the permanent loss of long distance viewsheds as previously noted
- the potential impact to the root systems of the existing fencerows resulting from filling with soil material in proximity to the dripline large mature trees
- the lack of tree preservation measures (other than placement of armourstone), such as enhanced setbacks in sensitive areas
- the impact to the fencerows when the berms are removed as part of the rehabilitation plan
- the very close proximity of the berms to the public roads and consequently the visual intrusiveness of the feature. The toe of the berm is 3.0m from the property boundary along the Olde Base Line and along Winston Churchill Boulevard, with the exception of the Rockfort Farm complex and the intersection of Winston Churchill and the Olde Base Line.

Summary of Affected View and Landscape Change

1. Phase 1 - low change in view, berms and tops of stockpiles visible from Winston Churchill Boulevard

Comment: no cross-sections illustrating the Phase 1 facility provided to prove the conclusion

2. Phase 2 - low change in views; perimeter berm constructed at southwest corner behind existing vegetation conceals Phase 2 extraction and processing area.

Comment: No cross-sections illustrating the visual impact at southwest corner provided to prove the conclusion.

3. Phase 3 - medium-high change resulting from clearly visible berms and the loss of long views across property.

Comment: No assessment of significance of the degree of impact resulting from blocking the views from Winston Churchill Boulevard to the pastoral CHL.

4. Phase 4 - high change; berms along the north portion of Winston Churchill Boulevard block views into the Westerveld property.

Comment: No assessment of significance of the degree of impact resulting from blocking the views from Winston Churchill Boulevard, or the alteration in the contextual setting for the Rockfort Farm complex.

5. Phase 5 - little additional change because perimeter berms are put into place in Phase 4

Comment: No cross-sections illustrating the impact of the removal of the woodlot that is closest to the Olde Base Line and the views into the entrance of the pit to support the conclusion that there is no change during this phase.

6. Rehabilitated quarry – high change compared to existing views; concluded that it will be a ‘visual focal point for the community and make a contribution to the areas cultural heritage landscape’.

Comment: Agree that there will be a ‘high’ change as the site is decommissioned; the report does not address the construction impact of removing the perimeter berms and re-landscaping the extraction area and extant property. Disagree that the visual integrity of the rehabilitated quarry does not devalue the overall visual attractiveness of the property.

Residential Locations

Most neighbours are impacted by the quarry proposal. The most significant visual impacts are to the residential properties located on the west side of Winston Churchill Boulevard. The long distance views into a pastoral landscape will be replaced by mid-ground views to the perimeter berms. The residential properties to the east are within 200m of the extraction limit and rely on existing vegetation on their own properties to buffer views to the perimeter berms.

Comment: Visibility mapping should be undertaken to demonstrate that there are no views into the plant site. The cross-section should provide data on the average height of existing trees, elevations at the viewing locations and elevations on the top of the acoustic berm to demonstrate that the plant is screened.

Shipping

Impact of off-site visual impacts was not assessed and was noted as 'typical for a rural area with important aggregate resources and is consistent with the planned function of the road that will be used'.

Comment: The preferred haul routes will require improvement, and this has not been addressed adequately. The EA reference is outdated and there needs to be an evaluation of the impacts to the haul route corridors because they traverse the Niagara Escarpment Plan areas. There is also a need to address the access and egress lanes to the quarry (lay-by, right turn in, widened left turn exit) and to understand how much regrading is involved in the road corridor 'improvements' to the Old base Line, Mississauga Road and King Street.

4.0 Summary of Issues and Concerns

The report concludes that the proposal will not have any unexpected or unacceptable impacts and the proposal is 'reasonable within the range of conditions that would be expected to occur'.

The evaluation should have addressed the scenic landscape quality throughout the area. The visual assessment should have regard for the NEP area and acknowledge that the NEC Landscape Evaluation Study ranks the property as 'Attractive' because of the mosaic of agricultural and natural features and the influence of the escarpment landscape. These lands are attractive because of the diverse features on the property. The layering of natural and cultural features establishes its scenic character. The loss of several of these features will degrade the visual quality of the property and impact the scenic character of the area.

The components of the scenic quality² are: 1) landforms; 2) vegetative cover; 3) land use; 4) special features; 5) views.

The quarry proposal replaces most of the existing components (with the exception of the Rockfort Farm complex) with a perimeter acoustic berm and fencerow planting to screen views. This change is significant and detrimental to the scenic character of the property ('distant' views are lost, the diversity of the landscape features is reduced and the CHL is degraded by quarry operations).

² Landscape Evaluation Study, Niagara Escarpment plan Area – Niagara Escarpment Commission April 1976

The *Visual Impact Report* states that the “rehabilitated quarry will be a visual focal point for the community and make a contribution to the area cultural heritage landscape”. Given that neither lakes nor commercial quarries have formed part of the historical landscape or activities on the subject site, the scenic contribution of the proposed rehabilitation plan is highly questionable.

The peer review team believes that the magnitude and significance of the changed landscape is both unexpected and unacceptable in this context because the setting is scenic, visually linked with the Niagara Escarpment landscape and is important because of the quality of the cultural heritage landscape features.

5.0 Visual Assessment Methodology

The methodology employed does not have sufficient detail to adequately assess the impact of the change and the effectiveness of the mitigation. The methodology needs to produce a process that is replicable with a sufficient level of detail and accuracy to assess the impact of the proposal. The cross-sections that were provided exaggerated the vertical scale and did not specify the elevations from the viewing locations or the berms (base and top). The cross-sections were not prepared for key locations including the intersection of the Olde Base Line and Winston Churchill Boulevard or for the entrance from the Olde Base Line.

The Niagara Escarpment Commission outlines guidelines for the preparation of visual assessment studies to ascertain the impact of development proposals. The methodology for the Rockfort Quarry proposal should have regard for the investigative methods recommended by the NEC because it represents standards for the preparation of visual assessment studies that have been tested and accepted as meeting acceptable levels of detail. The visual impact assessment should establish a baseline for existing conditions, identify the physical changes and assess the degree of impact (significance of what is lost) of the change rather than only identify the degree of change.

The investigative methods recommended by the NEC include:

- Digital viewshed mapping drawn from digital base data (roads, topography, vegetation and orthophotography and parcel boundaries) along with the physical description of the proposed quarry and operations infrastructure (acoustic berms, SWM pond, spoil piles, product piles, buildings, and conveyors) to model where the proposal would be visible from
- Ground truthing to field check the accuracy
- Production of a viewshed (visibility) map and the identification of key viewsheds, viewpoints and sightlines that require further study
- Preparing photographic illustrations of the impacts

- Preparing line of sight cross-sections from key sightlines without vertical exaggeration and providing the elevations for the critical elements (road elevations, berm elevations, height of existing and proposed trees)

Photographs taken for photographic simulation purposes should be prepared during leafless conditions, from locations with identifiable elevations (GPS, OLS) to ensure the accuracy of the simulations. The methodology used to fix the location and height of the quarry facilities horizontally and vertically should be described and replicable.

Mitigation measures for features that change (trees) should be modeled at the appropriate size (initial plantings will be nursery stock, later phases should show appropriate growth rates depending on the timing of the phasing).

Line of sight cross-sections should illustrate the impact from key locations including but not limited to the entrance road at the Olde Base Line, the intersection of the Olde base Line and Winston Churchill Boulevard, from affected residences, and from regular intervals along Winston Churchill Boulevard.

6.0 Policy Review and Conformity

6.1 Town of Caledon Official Plan

The following are sections of the Caledon Official Plan that are relevant to the assessment of visual resources and impacts, as investigated within the Visual Impact Report (MHBC, Wendy Shearer, July 2008) prepared for JDCL. In addition to a summary of affected views and landscape change, the report includes a discussion of visual impacts related to the cultural landscapes of the site and surrounding area. Additional comments on these conclusions and the policies of the Caledon Official Plan specifically related to cultural heritage resources can be found in the Cultural Heritage Resources peer review (André Scheinman, ENVision).

General Policies

The Caledon Official Plan General Policies (Chapter 3) call for the protection of both cultural heritage landscapes and scenic natural landscapes. The interrelationship between the two and a commitment to the management of visual resources is noted in policies pertaining to Ecosystem Planning and Management (Section 3.1) and cross-referenced in the Cultural Heritage Policies (Section 3.2).

Section 3.1.3 5 - Protection of Scenic Natural Landscapes states that:

“There is a significant relationship between natural and cultural landscapes. The pattern of human settlement in Southern Ontario has been profoundly influenced by natural systems and the physical landscape, and the natural environment has, in turn, been significantly altered by human activities. In recognition of this relationship and the broader aesthetic, recreational, social and economic value of “scenery” and “scenic

landscapes”, the Town will develop through a consultative process, visual resource management techniques.

Section 3.2.3.1.14 - Cultural and Natural Landscapes states:

“In its consideration of all development and redevelopment proposals, the Town will have regard for the interrelationship between cultural heritage landscapes and scenic natural landscapes in accordance with Section 3.1.3.5 of this Plan.”

The cultural heritage policies of the Caledon Official Plan also call for the *conservation of significant cultural heritage vegetation* (Section 3.2.3.1.15) along streets and roads in the design of any development.

Section 5.11 of the Caledon Official Plan: Mineral Resources

Section 5 of the Official Plan pertains to the protection and management of Caledon’s significant mineral aggregate resources. It notes the need to balance the management of these needed resources with the preservation of Caledon’s unique identity which is characterized by its historic hamlets and villages, natural features, recreational areas and agricultural landscapes.

With respect to visual resources, Section 5.11.2.4.2 requires that the following criteria be met prior to the approval of an application for an Official Plan Amendment to designate lands identified as Aggregate Resource Lands for a new extraction operation or expansion to an existing extraction operation.

- e) *the applicant has completed a Visual Impact Report as described by Section 5.11.2.4.11 and demonstrated that the proposal will not have any unacceptable impacts;*

Section 5.11.2.4.11 further states:

“The Visual Impact Report required by Section 5.11.2.4.2 (e) shall address the following:

- a) *assess the significant views and how they might be affected by the proposed extractive operation;*
- b) *assess the changes to the natural landscape and the cultural landscape that would result from the operation; and*
- c) *identification of any required mitigation measures, and the visual character of such measures. This may include berms, entrance designs, vegetation, landscaping; and operational matters such as small phases, screening of equipment, direction of extraction which would seek to minimize visual impacts.”*

6.2 Niagara Escarpment Plan

The proposed quarry site is located outside of the Niagara Escarpment Plan (NEP) area. Portions of the proposed haul routes (Olde Base Line Road and Mississauga Road) pass through sections of the Escarpment Rural Area, the Escarpment Protection

Area, and the Escarpment Natural Area. Consequently, it is assumed that any proposed road improvements or alterations are subject to the relevant zone-specific policies and objectives of the NEP. As well, the main Bruce Trail crosses Mississauga Road approximately 1.2 km south of Olde Base Line, within the zone of the proposed haul route.

Specifically, with respect to mineral resources, Section 2.11 of the NEP notes objectives to minimize the impact of new mineral extraction operations on the Escarpment environment, including haul routes, as follows:

“Extractive operations including wayside pits and quarries and haul routes shall not conflict with the following criteria:

a) The protection of sensitive ecological, geological, historic and archaeological sites or areas.

e) The preservation of the natural and cultural landscapes as much as possible during extraction and after rehabilitation.

f) The minimization of the adverse impact of extractive and accessory operations on parks, open space and the existing and optimum routes of the Bruce Trail.

6.3 Policy Conformity Conclusions

The *Visual Impact Report (MHBC, Wendy Shearer, July 2008)*, prepared for JDCL addresses the requirements of Section 5.11.2.4.11, and identifies and assesses significant views and changes to the natural and cultural landscapes over the proposed phases of the operation. In conjunction with the proposed Site Plans it outlines the visual characteristics and impacts of the mitigation measures related to various aspects of the operations and screening measures, as outlined in Section 5.11.2.4.11 (c). The resultant ranking of impacts associated with the operations is described as *no-low* during the first two phases when the quarry and perimeter berming are set well-back from the roads, increasing to *medium-high* and *high* during phases three to five, when the quarry is significantly expanded, the extant cultural heritage features of the Westerveld farm are removed or buried, and the perimeter berm is located within close proximity to Winston Churchill Boulevard. The re-instatement of views into the site, and the relocation of the key heritage features will not occur until final rehabilitation of the site which is discussed as some fifty years into the future. At which time, the present cultural landscapes and viewsheds of the property will have been irrevocably lost.

This is clearly stated by one of the earliest reports prepared for JDCL on the subject of the heritage resources of the site and its surrounding contextual landscape:

“development of the Rockfort Quarry site for aggregate extraction will result in permanent physical and visual impacts to the existing cultural landscapes of the Rockfort and Westerveld farmscapes, the southern portion of the (Van der Smissen) farmscape and the associated haul route (Cultural Heritage Landscape Assessment Report: Rockfort Quarry Site (Dillon Consulting Limited, October 1999)”.

Further discussions of the findings of the Visual Impact report are provided in previous sections of the peer review letter. However, it is the opinion of this peer review team that the conclusions of the report fall short in their demonstration through the visual impact report that *“the proposal will not have any unacceptable impacts”* as is required by the Mineral Resources policies of the Caledon Official Plan (Section 5.11.2.4.2), enacted through OPA 161, and ruled by the Ontario Municipal Board (OMB) as having applicability to the Rockfort Quarry application (OMB Decision / Order No. 1580, November 25, 2003).

As well, there is no survey within the JDCL documentation of the landscape features and attributes and the visual qualities found along the proposed haul routes. There is only a cursory reference in the Visual Impact Report to the visual impacts associated with the anticipated truck traffic, described as *“the degree of change will be high when a truck passes by and no change when a truck is not passing by. The impact is typical for a rural area with important aggregate resources and is consistent with the planned function of the roads that will be used.”* Given the scenic qualities of this area (ranked by the Niagara Escarpment Commission as ‘Very Attractive, which is second only to the top ranking of ‘Outstanding’), and the location of the proposed haul routes through the Niagara Escarpment Plan, the peer review team feels this is an inadequate discussion of the impacts that will be experienced along the haul routes.

It is further assumed in the Visual Impact report that the visual considerations associated with road upgrades are addressed through the Environmental Assessment process, as examined in the *Regional Road Improvements in the Belfountain Area – Environmental Study Report (1996)*. This plan is more than 10 years old and it can be assumed that some changes will have occurred to the natural and cultural features that exist along the roads, and a new survey should be undertaken. The *Traffic Impact and Haul Route Evaluation Study Report - Addendum (URS, 2008)*, prepared for JDCL, notes that the Region of Peel will be undertaking new Environmental Assessments for the following related road sections: Winston Churchill Boulevard (Olde Base Line to Bush Street), and Olde Base Line (Winston Churchill Boulevard to Mississauga Road) in 2010, suggesting that the 1996 Environmental Study will be revisited in any case.

The proposed haul routes pass through the Niagara Escarpment Plan area and, as such, any associated changes or impacts to visual resources are subject to the policies contained within the Niagara Escarpment Plan and its associated guideline document for undertaking visual impact assessment. Accordingly, it is recommended that further commentary from the Niagara Escarpment Commission on the matter of visual impacts along the haul routes should be sought.

7.0 Conclusions

It is the opinion of this peer review that the conclusions of the visual assessment report fall short in their demonstration that *“there will not be any unacceptable impacts”* resulting from the proposed quarry and its operations, as is required by the Mineral Resources policies of the Caledon Official Plan (Section 5.11.2.4.2), enacted through

OPA 161, and ruled by the Ontario Municipal Board (OMB) as having applicability to the Rockfort Quarry application (OMB Decision / Order No. 1580, November 25, 2003).

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Eha Naylor', written in a cursive style.

Eha Naylor, OALA, FCSLA
Principal
ENVision – The Hough Group Limited