



CBM-Caledon Quarry

CAART COMMENT SUMMARY TABLE RESPONSE #1 – [AIA]

Please accept the following as feedback from the Caledon Aggregate Review Team (CAART). Fully addressing each comment will expedite the potential for resolution of the consolidated CAART comments and individual agency objections. **Additional comments may be provided once a response has been prepared to the comments raised below and additional information provided.**

Colour Code	Description
	Resolved
	Resolved subject to additional information being provided to CAART Reviewers (e.g, Implementation Guide, Report Addendums)
(no colour)	Response provided, but no further action taken or required by Project Team

	Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (Date)	CAART Response (Date)	Applicant Response (Date)	CAART Response (Date)	Applicant Response
Report: Agricultural Impact Assessment			Author: Sean Colville				
1.	<p>Description of the Onsite Agricultural Lands:</p> <p>There is an apparent contradiction in the AIA that the author should clarify, regarding the Canada Land Inventory (CLI) – Soil Capability for Agriculture classification associated with the PSA. A key finding of the AIA relates to the characterization of the quality of soils within the PAA. Throughout much of the AIA, the Subject Site has been described as being comprised mainly of CLI Class 4 soils, which are non-prime agricultural lands.</p> <p>“It is also worth noting that the majority of the Subject Site do not consist of prime agricultural lands. They are predominantly CLI Class 4 lands.” (Page 10).</p> <p>On page 33 of the AIA provides calculated Hoffman Productivity Index (“HPI”) values for the Subject Site (also referred to as the Primary Study Area) and a larger surrounding area, referred to as the HPMARA. The Hoffman Productivity Indices (HPI) are used to assign a single value for</p>	Page 21, Table 1, Figure 2, Pages 23-24. Page 33, Table 4.					

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	<p>each soil polygon. The value relates to the agricultural productivity of the soil map unit. The HPI value is determined by the relative percent of each soil capability class present in the soil map unit and provides an equivalent CLI capability class. Text from page 33 of the AIA is provided below.</p> <p>“As shown in Table 4, the HPI for the larger HPMARA is higher than that of the PSA. The HPMARA lands have an HPI of 0.73 which is equivalent in productivity to CLI Class 2 lands. The PSA has an HPI of 0.64 which is the equivalent in productivity to CLI Class 3 lands. CLI Class 3 lands have the lowest priority for preservation among the prime agricultural lands.”</p> <p>Based on the HPI results set out in the AIA, the amount of land that is considered to be Prime Agricultural Land in a Prime Agricultural Area needs to be clarified, as there are planning policy implications. In addition, the amount of Prime Agricultural Land in the PAA should also be provided based on the proposed extraction limits (i.e., 200 ha). This information is important as the extraction limits are directly related to lands that will be removed from agriculture.</p>						
2.	<p>Description of Agricultural Operations and Agricultural Land Uses:</p> <p>It is noted that the AIA did not include Farm Data Surveys or any documentation from onsite and adjacent farmers. Data obtained from the landowner/farmer would be useful in corroborating the characterizations attributed to each Agricultural operation.</p> <p>A more detailed description of Farm Operation #1 would also be helpful.</p> <p>As well, it would be useful to determine if any Nutrient Management Plans are associated with the PSA as these management plans could be impacted by aggregate extraction.</p>	Page 24-26, Figure 3.					
3.	<p>Fragmentation of Agricultural Lands:</p>	Page 30, Figure 5.					

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	<p>A discussion/comparison of Property Size/Fragmentation for the PSA/SSA nor does the report compare the farm sizes set out in the Census of Agriculture statistics for 2011, 2016 or 2021.</p> <p>Discussion concerning the ownership and tenancy of Agricultural parcels within the PSA and SSA – are the farmlands within the PSA and SSA locally owned and operated?</p> <p>Discussion concerning the future ownership of the lands associated with the application - will the lands associated with the development will remain in one consolidated land parcel (lot lines merge) or will the existing lot lines be maintained? Will the future ownership and use of the subject property (and adjacent lands owned or leased by the applicant) conform to the uses associated with the PAA or will the development of a large recreational lake area result in pressure to develop the lands for more intensive non-agricultural land uses in the future?</p>						
4.	<p>Economic and Community Benefits of Agriculture</p> <p>The AIA did not provide an opinion with respect to the contribution of the Agricultural activities associated with the subject lands to the economy of the Region and Town.</p>	Page 32.					
5.	<p>Alternative Site Assessment</p> <p>Appendix I provides mapping for the Alternate Site Assessment. The mapping illustrates Active Aggregate Sites within an area much larger than the SSA. There are mapping inaccuracies in the aggregate site mapping. The base layer for the mapping is Physiographic mapping from the Ministry of Northern Development and Mines. The Niagara Escarpment Area and settlement areas are not shown on the base layer and the source of natural heritage features mapping is not clear.</p>	Page 33, Section 5.11 & Appendix I.					

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6.	<p>Assessment of Impacts to Agriculture</p> <p>Section 6.1.1 assesses the impact of extraction on the onsite Prime Agricultural land. The AIA notes that 119.02 (45.57%) of Prime Agricultural land (CLI Class 2 lands) will be removed.</p> <p>This statement appears to be inconsistent with the HPI value report in Table 4 (page 33).</p> <p>No statement was provided on the area of Prime Agricultural Land in a Prime Agricultural Area that will be removed.</p> <p>A map in the AIA that illustrates what lands are owned vs controlled would be helpful.</p> <p>Impacts related to hydrogeology, transportation, noise/dust/vibration are assessed by other technical specialists. The AIA does not provide a statement regarding the ability of the site to handle onsite parking ability for haul trucks or the potential for offsite queuing of trucks on municipal roads. There is one operation that is located just beyond the SSA, No. 1, that should specifically be evaluated by the hydrogeologist to ensure that water resources are protected and a program for monitoring is provided. The AIA should summarize these measures.</p>	Section 6, Page 34					
7.	<p>Agricultural Technical Recommendations</p> <p>Site Plan does not include provisions for soil stripping, soil storage and soil re-application procedures.</p> <p>SAI notes that the Site Plan includes a site plan over-ride related to fencing: Site Plan Over-ride No. 3; <i>Rationale #1: This will enable agricultural production to continue with minimal disruption and accounts for the long life expectancy of the operation. The AIA should discuss this provision and describe why this is needed.</i> Please explain this.</p>	Section 9.1, Page 42.					

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	The AIA does not reference a maximum disturbed area for the proposed pit/quarry however, the Site Plan includes a provision to limit disturbance to 95 ha. The AIA should address this requirement.						
8.	<p>Review of Agricultural Policies</p> <p><u>SAI Comment on PPS Assessment:</u></p> <p>The AIA should describe and discuss the area of the site that is in the PAA and the relevant CLI – Soil Capability For Agriculture classification of these lands within the PAA. A further breakdown of the area of the site, within the PAA, that will be extracted should be provided.</p> <p>There has been limited documentation provided in the AIA that discusses the feasibility of agricultural rehabilitation.</p> <p>The AIA should clearly state what portions of the site are considered to meet the requirement of “<i>In prime agricultural areas, on prime agricultural land.</i>”</p> <p>If the Subject Site is deemed to be Prime Agricultural land within a Prime Agricultural area, then the provides set out in 2.5.4.1 a), c) and d) should be examined in detail. Conversely, if the Subject Site is deemed to be non-prime agricultural land, then it would seem that the Alternative Site Location study is not required. Clarification of this matter is required.</p> <p><u>SAI Comment on Growth Plan</u></p> <p>As previously noted, the Province of Ontario issued a Provincial Planning Statement, 2024 under Section 3 of the Planning Act and it will come into effect October 20, 2024. The applicability of these provisions under the Growth Plan should be clarified.</p> <p><u>SAI Comment on ARA Assessment</u></p>	Section 2, Pages 9-15.					

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	<p>The AIA does not address the Matters that a Minister or Tribunal shall have regard to including 12(1) d), f), and g).</p> <p><u>SAI Comment on Greenbelt Plan</u></p> <p>Policies 3.1-3.6 inclusive set out the planning framework for the Agricultural System in the Protective Countryside. A summary of each policy within 3.1 should be provided, except policy 3.1.2 as there are no Specialty Crop Areas onsite on the site or in the SSA.</p> <p>The remaining agricultural-related policies within 4.3.2 should also be addressed including 4.3.2.6 and 4.3.2.7.</p> <p><u>SAI Comment on Region of Peel Official Plan</u></p> <p>Schedules D-1 Prime Agricultural Area and Rural Land and Schedule D-2 – High Potential Mineral Aggregate Resources Areas should be included in the AIA. The AIA should provide a statement, based on the findings of the AIA, as to the conformity of the proposed mineral aggregate operation to the agricultural-related policies of the Region of Peel Official Plan.</p> <p><u>SAI Comment on Town of Caledon Official Plan</u></p> <p>The AIA should include mapping of the relevant schedules from the Caledon Official Plan.</p> <p>The statement, “<i>A significant portion of the Subject Site consists of non-prime agricultural lands.</i>” This statement should be operationally defined within the context of the relevant planning policy framework. As previously noted, the HPI results reported in the AIA indicate a Productivity Index Range of CLI Class 3. Further, the statement should be focused on the PAA portion of the subject property and the proportion of Prime Agricultural Lands within the area proposed to be extracted</p>						

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	<p>(and not rehabilitated to an agricultural end use) should be documented.</p> <p>The concluding paragraph should review each portion of Policy 5.11.2.2.9 a)-d) inclusive to assess conformity with the relevant policy framework in the Caledon Official Plan.</p> <p><i>5.1.1.22 Conservation Easements for Agricultural Land</i> – The AIA should address the potential for implementation of Conservation Easements for Agricultural Lands.</p>						
9.	<p>Results of Peer Review – General Comments</p> <p>A) Clarification of agricultural capability of the Primary Study Area is needed.</p> <p>B) The planning policy and ARA component of the AIA, i.e. Section 2 of the AIA, should be re-visited.</p> <p>C) The Alternate Site Assessment Figure is not a particularly useful map, and it is unclear if the consideration of Alternatives is even required from a policy perspective.</p> <p>D) Site Plan provisions (and relationship with the provisions of the Aggregate Resources Act) should be evaluated in the AIA.</p>						