



June 23, 2025.

BY EMAIL ONLY

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and

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and

Integrated Aggregate Operations Section
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON K9J 3C7
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RE: Notice of Objection
Application for a Class A Licence under the Aggregate Resources Act (ARA)
Proposed CBM Caledon Pit/Quarry
Part of Lots 15-18, Concession 4 WSCR and Part of Lot 16,
Concession 3 WSCR (former Geographic Township of Caledon),
Town of Caledon, Regional Municipality of Peel

Dear Mr. Lebreton,

The Town of Caledon (Town) is in receipt of a May 30, 2025, Notice of Objection Form and submission package related to the above noted ARA licence application, forwarded by CBM and its aggregate consultant, MHBC.

As you are aware, at the conclusion of the initial notification and 60-day consultation period under the ARA, the Town registered official objections to the application based on details related to the natural environment, hydrogeology, blasting, air quality, noise, agricultural resources, traffic and the ARA site plans.

Since that time, CBM and its project team have provided various responses and resubmissions to the Town for its review. In addition to an August 13, 2024, response package to Town comments under the ARA (authored by MHBC), response materials have been provided by the CBM project team in January, March and May 2025. Proponent response materials related to noise and natural heritage impacts remain outstanding.

In turn, the Town, in conjunction with members of the Caledon Aggregate Agency Review Team (CAART) and the Town's peer reviewers have reviewed the original application materials and provided comments related to natural environment, hydrogeology, karst, blasting, air quality, noise, agricultural resources, traffic, cultural heritage and visual impact to the project team.

Based on the updated materials received by the Town under the ARA and Planning Act processes, some of the Town objections have now been addressed, however there remain outstanding objections. Please see Attachment 1 for further details.

Attachment 1 to this letter provides the Town's response to the August 13, 2024, letter received under the ARA process. It is important to note that these comments have been provided without the benefit of CAART and peer review comments on proponent response materials forwarded in January, March and May of 2025.

Until such time as the CAART members and Town peer reviewers have had an opportunity to adequately review and respond to the March and May 2025 updated application materials, the Town reserves the right to identify further concerns and to provide additional recommendations for the resolution of any concerns identified as part of the ARA and Planning Act application(s) processes. Accordingly, the Town is maintaining its status as an Objector under the ARA as it

has continued objections to the subject ARA licence application. Please see Attachment 2 to this letter for the Town's completed Objection Form.

As noted earlier in our November 17, 2023, letter, additional planning and land use considerations will require further assessment and will be reviewed primarily under the parallel Planning Act process.

We look forward to continuing our review of the subject application. For further questions and comments related to this file, please contact the undersigned.

Sincerely,



Genevieve Scott

Cuesta Planning Consultants Inc. on behalf of
Strategic Policy, Planning & Development Department
TOWN OF CALEDON

cc: Kyle Munro, Town of Caledon
Lesley GillWoods, Town of Caledon
Paula Boutis, Town of Caledon
Chris Barnett, Osler, Hoskin & Harcourt LLP

Attachment 1

#	Town 17/Nov/23 Comment	Proponent Response (13/Aug/24 & March/May 2025 submission)	Town 23/June/25 Comment
1.	<p>Please note, the comments contained herein relate primarily to the materials prepared as per the requirements of the Aggregate Resources of Ontario Standards adopted by Regulation 244/97 under the ARA. The comments have been provided without the benefit of agency or peer review comments. Therefore, please be advised that these comments should be considered as preliminary in nature. The Town reserves the right to identify further concerns and to provide additional recommendations for the resolution of any concerns identified as the review of this licence application continues.</p> <p>Please also note, under the Planning Act process for the associated Official Plan and Zoning By-law amendment applications (POPA 2022-006 & RZ 2022- 0010), the Town will be providing additional comments which will incorporate concerns identified by commenting agencies and the Town's peer reviewers via the recently established Caledon Aggregate Agency Review Team (CAART) process. Comments related to cultural heritage, visual, transportation, and socio- economic impacts, blasting, and fly rock, in addition to further comments on matters noted herein, will be provided under the Planning Act process.</p>	MHBC provides the following response: Comment noted.	<p>Please note, the CAART review process established under the Planning Act process remains on-going. The latest submission materials provided in March and May of 2025 have been forwarded to the CAART members for their review and comment. The Town is in the process of initiating a second round of peer review of the updated application materials.</p> <p>Until such time as the CAART members and Town peer reviewers have had an opportunity to adequately review and respond to the March and May 2025 updated application materials, the Town reserves the right to identify further concerns and to provide additional recommendations for the resolution of any concerns identified as part of the ARA and Planning Act application(s) processes. Accordingly, the Town is maintaining its status as an Objector under the ARA.</p>
Natural Heritage Assessment			
2. a)	<p>The Natural Environment Report, revised July 2023, prepared by Golder Associates Ltd. (Golder) was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MacNaughton Hermesen Britton Clarkson Planning Limited (MHBC). Please note the following:</p> <p>Further information will be required by the Town related to the adequacy of the proposed operational and berm setbacks from identified natural heritage features.</p>	<p>WSP provides the following response:</p> <p>Setbacks are of a sufficient distance to protect wetland form and functions (e.g., hydrological, hydrogeological, wildlife habitat) and woodland form and functions (e.g., hydrological, hydrogeological) from potential development impacts, including direct removal, edge effects, and screening of human disturbances (e.g., noise, light) (Beacon 2012). Based on the natural environment, hydrologic and hydrogeologic assessments, the setbacks of the proposed extraction area from natural heritage features including woodlands and wetlands is considered sufficient to avoid adverse impacts to the form and function of these features. Municipalities such as the City of Toronto (Toronto 2016), City of Guelph (Guelph 2019) and Centre Wellington (Centre Wellington 2018) recommend minimum tree protection distances based on the tree diameter at breast height (DBH), which can extend up to 6 m from the tree trunk for trees measuring up to 100 cm DBH. Larger protection distances are recommended for woodland or ravine features where the combined root network may be larger. Protection distances for woodland or ravine features may extend up to 12 m from the outside of the tree trunk for trees measuring up to 100 cm DBH (Toronto 2016; Guelph 2019). The proposed</p>	<p>Thank you for the additional information/rationale related to the proposed setbacks from identified natural heritage features. It will be taken into consideration as part of the on-going CAART review process.</p> <p>Please note, the Town provided CAART Comments (First Circulation) related to the Natural Environment Report (NETR) to the project team on February 12, 2025. Additional comments were provided on March 21, 2025, specific to Brook Trout and its spawning habitat in the Credit River. The CAART Comments on the NETR included concerns related to natural heritage feature characterization and subsequently, concerns related to impact assessment and proposed mitigation measures.</p>

		setbacks include a minimum of 15m from significant woodlands and 30 m from Provincially Significant Wetlands (PSW). These setbacks are considered appropriate for protection of the form and function of the features (e.g., wildlife habitat) and are consistent with other applications in Ontario that WSP has worked on.	<p>It is our understanding that a project team response to the CAART Comments (NETR) is currently being finalized and will subsequently be forwarded to the Town for the CAART members' review.</p> <p>Until such time as the CAART members and Town's peer reviewer have had an opportunity to review the March and May 2025 updated application materials and receive and review the project team response to CAART Comments on the NETR, this comment remains unresolved.</p>
2. b)	Further information related to the provincial permitting requirements under the Endangered Species Act and timing of the removal and creation of little brown myotis and eastern small-footed myotis habitat is required.	<p>WSP provides the following response:</p> <p>An Information Gathering Form was submitted to the MECP, and WSP is currently working with a Management Biologist at the MECP on the next steps, which may include submission of an Avoidance Alternatives Form. Timing of removal and habitat creation will be confirmed through the process with the MECP.</p>	Thank you for the update related to bat habitat and the on-going MECP approval process. The Town requests that it be kept apprised of any developments related to the MECP permitting and/or registration process under the Endangered Species Act.
2. c)	The timing of the bat and grassland bird habitat creation should be indicated on the ARA site plans with the habitats prioritized during progressive rehabilitation.	<p>MHBC provides the following response:</p> <p>The woodland and grassland habitat creation located outside of the licenced boundary is not governed by the ARA Site Plans. As noted on Figure 9 of the GSAI Planning Report this habitat will be created within five years of issuance of the licence. The other grassland and bat habitat to be created within the licenced boundary are predominantly located where berms are proposed and this habitat cannot be created until the berms are removed.</p>	Please confirm if the woodland and/or grassland habitat proposed to be created off-site is required compensatory habitat. If so, please include an appropriate visual reference on the relevant ARA Site Plan(s) along with planting details/notes. With respect to the proposed timing of habitat creation, the Town expects further comment from its peer reviewer, therefore, this comment remains unresolved.
2. d)	Please add the Natural Environment Report requirement to install Vegetation Protection Zones (VPZ) adjacent to identified natural heritage features immediately prior to extraction in each phase, to the ARA site plan notes.	<p>MHBC provides the following response:</p> <p>The extraction area as shown on the ARA Site Plans incorporates the setbacks that have been recommended in the Natural Environment Report and are included in notes O.9.e to O.9.h on Drawing 3 of 4 of the ARA Site Plans. See Attachment A for redline Site Plans dated August 2024.</p>	As noted in the CAART Comments on the NETR, the adequacy of the proposed Vegetation Protection Zones (VPZs) remains an outstanding concern for the Town and its peer reviewer. To date, there have been no ARA Site Plan revisions reflecting the peer reviewers request to increase the widths of proposed VPZs.
2. e)	Please provide the rationale as to why on-going monitoring of natural heritage features and potential impacts during the lifespan of the operation has not been recommended.	<p>WSP provides the following response:</p> <p>No impacts to off-site vegetation and wildlife are anticipated as a result of the proposed extraction.</p> <p>Surface and groundwater levels will be monitored in areas around the site leading up to and including the operational life of the site, through to</p>	<p>Thank you for the additional information related to the proposed surface and groundwater monitoring program.</p> <p>The Town provided CAART Comments related to the Water Report Level 1/2 (Hydro-g) in December 2024 to the project team which requested additional</p>

		<p>fulfilment of rehabilitation obligations, and will serve as an indication of potential impacts to plant communities.</p>	<p>information related to potential impacts to surface water levels at the various surface water features in the area, including wetlands. The CAART Comments on the NETR requested more details including impacts to groundwater levels, surface water drainage and catchment areas, water depths and hydroperiods to understand the existing conditions and the proposed impacts (on and off-site) during each operational phase, rehabilitation and post-rehabilitation.</p> <p>Details on the location and extent of the groundwater zone of influence (ZOI) and those natural features that are within the ZOI was also requested by the Town’s natural heritage expert along with further information on the effectiveness of the proposed infiltration trench system and slurry wall was also requested.</p> <p>These details are necessary to evaluate the efficacy of the proposed adaptive management plan, monitoring program and mitigation.</p> <p>The Town recognizes that the March and May 2025 materials provide a response (in part) to the above noted concerns.</p> <p>Until such time as the CAART members and Town’s peer reviewers have had an opportunity to review the March and May 2025 updated application materials and receive and review the project team response to CAART Comments on the NETR, this comment remains unresolved.</p>
2. f)	The Rehabilitation Plan should identify which professional will undertake implementing the natural heritage recommendations.	<p>MHBC provides the following response: It is the responsibility of the Licensee to implement the rehabilitation requirements on the ARA Site Plans.</p>	<p>Noted. ARA Site Plan can include wording such as “qualified biologist” to identify the professional who will implement and/or monitor implementation of the natural heritage recommendations.</p>

2. g)	The Rehabilitation Plan should include a requirement for all habitat creation areas to be audited two years after planting to assess planting survival rates and restock if/as required.	<p>WSP provides the following response:</p> <p>WSP provided the following recommendation for the woodland planting in the main area that has been included on Drawing 4 of 4 of the ARA Site Plans:</p> <p>“... two years after planting, the target density shall be 1,200 seedlings per hectare with a survival rate of 75%. Infill plantings shall be completed if required in year two after planting.”</p> <p>To address the Town’s comment, the following new note (Note A.5) will be added under the Final Rehabilitation note on Drawing 4 of 4 of the ARA Site Plans:</p> <p>“All plantings completed as part of rehabilitation will be audited two years after planting to assess planting survival rates and additional plantings shall be completed if required to create the habitat conditions as specified on this page.”</p> <p>See Attachment A for redline Site Plans dated August 2024.</p>	<p>Thank you for the additional information related to the requirement to audit habitat creation areas two years after planting to assess planting survival rates and restock if/as required.</p> <p>This comment is resolved.</p>
2. h)	Please label Woodlands B and D and Tributary #1 directly on the Rehabilitation Plan.	<p>MHBC provides the following response:</p> <p>The ARA Site Plans have been updated to label Woodlands B and D and Tributary #1 on the Rehabilitation Plan. See Attachment A for redline Site Plans dated August 2024.</p>	<p>The Town’s request that Woodlands B and D and Tributary #1 be labelled directly on the Rehabilitation Plan has been implemented.</p> <p>This comment is resolved.</p>
2. i)	Please include the Key Natural Heritage Features Schematic on the Operational Plan.	<p>MHBC provides the following response:</p> <p>The ARA Site Plans have been updated to include the Key Natural Heritage Features Schematic on Drawing 2 of 4 of the ARA Site Plans. See Attachment A for redline Site Plans dated August 2024.</p>	<p>The Town’s request to include the Key Natural Heritage Features Schematic on the Operational Plan has been implemented.</p> <p>This comment is resolved.</p>
Water Resources Assessment			
3. a)	<p>The Water Report Level 1 and 2, revised July 2023, prepared by Golder was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MHBC. Please note the following:</p> <p>More information related to the dewatering of the site and any associated monitoring program is required. The reporting has indicated that water management activities and requirements will be determined under the Permit to Take Water application process. The Town is of the opinion that proposed water management activities should be reviewed as part of the licensing process. Relevant requirements are to be included on the ARA Site Plans.</p>	<p>WSP provides the following response:</p> <p>The revised Water Report (Golder 2023) provides a water management plan, a groundwater mitigation plan, and a monitoring plan of sufficient detail to support this ARA application. CBM also acknowledges that some additional water monitoring requirements are likely to be added as the Permit to Take Water (PTTW) and the Industrial Sewage Works (ISW) Environmental Compliance Approval (ECA) are sought, but the level of information currently provided is accepted practice in the overall approvals process. WSP is currently undertaking additional technical studies to refine the understanding of hydrogeologic conditions in support of the proposed mitigation system at the</p>	<p>As noted previously, the Town is in the process of initiating a second round of peer review of the updated application materials received in March and May of 2025.</p> <p>Until such time as the Town’s hydrogeologist peer reviewer has had an opportunity to adequately review and respond to the March and May 2025 updated application materials, the Town’s concerns related to dewatering/water management at the</p>

		site, which will be used in the preparation of the documentation needed to obtain these additional approvals. These will be shared with the Town of Caledon and other agencies and stakeholder groups later this year when they become available.	site and the adequacy of any associated monitoring program remains unresolved. In a similar manner as identified in comment 3. d) of the Town's November 2023 letter, the Town's review will include any future PTTW and ISW ECA applications made as part of the overall proposal, including any revised or new applications made to MECP by the golf course landowner.
3. b)	Additional information is required regarding the proposed infiltration trench. Examples of sites where this approach has been successfully installed, along with long-term monitoring data from these sites, will be required to determine the potential efficacy of the trench.	WSP provides the following response: A mitigation system design study has been initiated that will be shared with regulatory bodies and stakeholder groups, when completed later this year. The study will include a review of similar systems, best practices, lessons learned, and how to optimize performance, reliability and longevity through good design, operation, and maintenance.	The Town is in receipt of the Mitigation Design System Report as part of the May 2025 submission which will be provided to the relevant Town peer reviewers for further comment. This comment remains outstanding at this time.
3. c)	The details and schedule for water monitoring at the outlet of the proposed settling pond should be identified on the site plans along with the proposed location of the settling pond (if known at this time).	WSP provides the following response: The site plans have been revised to show the location of the proposed settling pond in the southeast corner of the North Area on Drawings 2, 3 and 4 Upon rehabilitation, the settling pond will be transformed into the turtle pond shown on Drawing 4. As noted on Drawing 1 Table 1, the monitoring schedule and details for the settling pond outlet (SW26) will be determined by the MECP based on the PTTW and ISW ECA to be obtained by the CBM prior to the initiation of any off-site discharge.	Thank you for identifying the location of the proposed settling pond and plans for its after-use. As per our comment above, the Town's review will include any future PTTW and ISW ECA applications (and associated materials) made to MECP as part of the overall proposal.
3. d)	Details related to the golf course irrigation pond system and outlet to the Credit River will be required as part of the Town's review, in consultation with the MECP through a future Industrial Sewage Works (ISW) Environmental Compliance Approval (ECA).	WSP provides the following response: Acknowledged. This will be provided by CBM to the Town of Caledon when the ISW ECA application is made.	Please see the above response comments (3.a) and 3. c)).
3. e)	Prior to, or as part of the follow-up door- to-door private well survey, those landowners with wells that have significant or moderate potential to be impacted by quarrying activities must be clearly notified of this risk with the option to deepen their well(s) at CBM's expense.	WSP provides the following response: Acknowledged. As part of the follow-up door-to- door private well survey, CBM will notify landowners with wells that have significant or moderate potential to be impacted by quarrying activities of this risk with the option to deepen their well(s) at CBM's expense.	While the project team has acknowledged the need to notify landowners with wells that have significant or moderate potential to be impacted by quarrying activities of this risk, with the option to deepen their well(s) at CBM's expense, this detail has not been added to the ARA Site Plans. The Town's peer reviewer also recommended CBM consider methods that will encourage participation in the well survey. The Town acknowledges that these details may be included in the Water Addendum Report (March 2025). Until such time as the Town's peer reviewer has reviewed the March and May 2025 submission materials, this comment remains outstanding.

3. f)	The Well Complaint Response protocol should include a review of quality as well as quantity of water supply.	<p>WSP provides the following response: To address the Town’s comment, the following new note (Note 7.e.e.f) has been added to Drawing 3 of 4 of the ARA Site Plans:</p> <p>“If the issue raised by the land owner is related to water quality, the licensee will have a consultant/contractor determine the likely causes of the change in water quality, and review monitoring results at the quarry and background monitoring results from the baseline well survey to determine if there is any potential correlation with the quarry. If it has been determined that the quarry caused a water quality issue, the quarry shall continue to supply water at the licensee's expense until the problem is rectified. The licensee shall be responsible for restoring the water supply by replacing the well or providing a water treatment system. Only at the request of a landowner would a cistern be supplied. The licensee is responsible for the expense to restore the water quality.”</p> <p>See Attachment A for redline Site Plans dated August 2024.</p>	<p>Thank you for this addition to the Well Complaint Response protocol.</p> <p>This comment has been addressed.</p>
3. g)	A Spills Plan should be included on the Operational Plan.	<p>MHBC provides the following response: O.Reg. 244/97 Section 0.12(3).2 states: <i>The licensee or permittee shall ensure that a spill contingency plan is developed prior to any operation of the pit or quarry, and followed during the operations. O. Reg. 466/20, s. 2 (1).</i></p> <p>It is not a requiremeent to include on the ARA Site Plans. See Attachment B for a copy of CBM’s Spills Contingency Plan that applies to all of their aggregate sites.</p>	Noted. Please include a reference to CBM’s Spills Contingency Plan under Note K of the Operations Plan.
Blasting Assessment			
4. a)	<p>The Blast Impact Assessment, revised July 2023, prepared by Golder was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MHBC. Please note the following:</p> <p>The Blasting Notification program should include the Town as a party to be notified. The Town requires an opportunity to review and comment on the details of this program. The approved program should be added to the ARA site plan notes.</p>	<p>WSP provides the following response: The Blasting Notification program will include the Town as a party to be notified.</p> <p>The Town will be given an opportunity to review and comment on the details of this program. The approved program will be added to the ARA Site Plan. To address the Town’s comment, the following note (Note O.2.h) will be modified under the Technical Recommendations for Blasting on Drawing 3 of 4 of the ARA Site Plans. The existing note states the following:</p> <p>“The Licensee shall establish a blasting notification program for residents with 500 metres.”</p> <p>The following will be added to the end of this note:</p>	<p>Thank you for including the Town as a party to be notified under the Blasting Notification Program. This comment is partially resolved. Once the Blasting Notification program has been accepted by the Town’s peer reviewer and added to the ARA Site Plans, it is expected this comment will be fully resolved.</p>

		“...The Licensee shall also provide notification to the Town of Caledon Clerk prior to a blast taking place on site.”	
4. b)	Reports and records related to blasting procedures and monitoring results must be made available to the Town upon request or annually.	WSP provides the following response: Upon request, the Town will be provided with records of blasting and associated reports and vibration monitoring results.	Noted. This comment is resolved.
4. c)	In addition to the Blasting Notification program, the proponent should consider a voluntary pre-licensing foundation inspection program for residences within 500 metres of the proposed licensed boundary.	WSP provides the following response: A voluntary pre-licensing foundation inspection program for residences within 500 metres of the proposed licensed boundary is not considered necessary and could present issues. Canadian seasonal changes often cause numerous issues within residential structures, from the development of cosmetic cracking to structural damage. These issues occur in the absence of blast induced vibrations. A quarry can exist for several decades and during that time defects can arise which may have nothing to do with quarry blasting operations. If a homeowner notices damage at their home a few years after the quarry’s operation has begun, it is often difficult to determine what has caused the defect. If the records show that the vibrations for a blasting operation have remained compliant with the provincial guidelines (i.e., NPC-119), causes other than blasting have to be considered. A pre- blast inspection is appropriate for short-term blasting operations for construction activities since the limit for construction blasting is significantly higher than what is permitted for blasting at a quarry operation.	<p>The May 2025 ARA Site Plans (Note 2 o), Page 3 of 4) now includes the requirement that “prior to the commencement of blasting within 500 m of a structure and subject to landowner authorization, the Licensee will conduct a pre-blast inspection, periodic inspections while extraction is within 500 m and a post-blast inspection when extraction is no longer within 500 m of the structure. The result of the inspection will be provided to the landowner...”</p> <p>The Town requests details related to this inspection program (i.e. who is conducting the inspections and what would generally be included as part of the inspection records, etc). The proposed inspection program will be forwarded to the Town’s relevant peer reviewer for comment.</p> <p>Until the Blasting Inspection program has been accepted by the Town’s peer reviewer this comment remains partially resolved only.</p> <p>Please note CAART Comments on the Blasting Impact Analysis were provided to the project team in July 2024 with response material provided to the Town in January, March and May of 2025. Until such time as this latest material has been reviewed by the Town’s blasting expert, the Town reserves the right to identify further concerns and to provide additional comments related to potential blasting impacts.</p>
Air Quality Assessment			



5.	<p>The Air Quality Impact Assessment, revised July 2023, prepared by Golder was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MHBC. Please note the following:</p> <p>In addition to notifying the province of air quality complaints, as outlined in the Best Management Practices Plan (BMPP), the Town will require notification of air quality complaints. Town staff will work with the proponent to identify an adequate threshold requirement for this notification to be triggered.</p>	<p>WSP provides the following response: This change has been made. See Attachment C for a copy of the updated BMPP.</p>	<p>Thank you including the Town on the notification list of air quality complaints. This comment is resolved.</p> <p>Please note, CAART Comments on the Air Quality Impact Analysis were provided to the project team in October 2024 with the latest BMPP received by the Town in May 2025. The latest BMPP will be reviewed by the Town’s Air Quality expert. Until such time as this latest material has been reviewed by the Town’s expert, the Town reserves the right to identify further concerns and to provide additional comments related to potential air quality impacts.</p>
Noise Assessment			

6. a)	<p>The Noise Assessment Report, revised July 2023, prepared by Golder was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MHBC. Please note the following:</p> <p>Please confirm the setback of the nearest sensitive receptor northeast of Phase 2B as there is a discrepancy between the reporting and the ARA site plans.</p>	<p>WSP provides the following response:</p> <p>Although a similar dataset was used for the identification of receptors in the vicinity of the Project site, the receptors Identifications (IDs) were not consistent. The receptor IDs in the ARA site plans are more consistent with the blasting report. The noise assessment and associated report consider the same receptors but also includes vacant lot receptors, which is required by the MECP. The consideration of vacant lot receptors introduced additional receptors in the noise study, but the noise report also selected representative receptors (i.e., a single receptor was used to represent multiple receptors). These differences resulted in differences in receptor IDs. For instance, the Golder (Noise) POR025 is denoted in the Site Plans as POR024 and is located at a setback of 150 m from the Phase 2B proposed extraction boundary.</p> <p>To provide more context, the table below summarizes the IDs assigned to the same PORs that may be most impacted by the Phase 2B operations as shown on the Site Plans and as considered in Golder noise study.</p> <table><tr><th colspan="2">Point of Reception ID</th></tr><tr><th>Site Plan</th><th>Golder Noise Study</th></tr><tr><td>POR022⁽¹⁾</td><td>POR016</td></tr><tr><td>POR023</td><td>POR017</td></tr><tr><td>POR024⁽¹⁾</td><td>POR025</td></tr><tr><td>POR026⁽¹⁾</td><td>POR024</td></tr><tr><td>POR027</td><td>POR020</td></tr><tr><td>POR028</td><td>POR019</td></tr><tr><td>POR029</td><td>POR021</td></tr><tr><td>POR030</td><td>POR022</td></tr><tr><td>POR031</td><td>POR023</td></tr></table> <p>Notes: (1) Receptors closest to Phase 2B area</p>	Point of Reception ID		Site Plan	Golder Noise Study	POR022 ⁽¹⁾	POR016	POR023	POR017	POR024 ⁽¹⁾	POR025	POR026 ⁽¹⁾	POR024	POR027	POR020	POR028	POR019	POR029	POR021	POR030	POR022	POR031	POR023	<p>Thank you for the additional information.</p> <p>Please note CAART Comments on the Noise Assessment Report were provided to the project team in August 2024, however the Town is not in receipt of the project team’s response to these comments. Until such time as the Town’s peer reviewer has had an opportunity to review the May 2025 updated application materials and receive and review the project team response to CAART Comments on the Noise Assessment Report, the Town reserves the right to identify further concerns and to provide additional comments related to potential noise impacts.</p>
Point of Reception ID																									
Site Plan	Golder Noise Study																								
POR022 ⁽¹⁾	POR016																								
POR023	POR017																								
POR024 ⁽¹⁾	POR025																								
POR026 ⁽¹⁾	POR024																								
POR027	POR020																								
POR028	POR019																								
POR029	POR021																								
POR030	POR022																								
POR031	POR023																								
6. b)	<p>Please add the Noise Mitigation Schematic to the Operational Plan.</p>	<p>MHBC provides the following response:</p> <p>The ARA Site Plans have been updated to include the Noise Mitigation Schematic on Drawing 2 of 4 of the ARA Site Plans. See Attachment A for redline Site Plans dated August 2024.</p>	<p>Thank you for including the Noise Mitigation Schematic on the Operational Plan.</p> <p>This comment is resolved.</p>																						

Agricultural Impact Assessment			
7. a)	<p>The Agricultural Impact Assessment, revised July 2023, prepared by Colville Consulting Inc. was reviewed alongside the ARA Site Plan drawings, dated August 2023, prepared by MHBC. Please note the following:</p> <p>The Final Rehabilitated Landform and Ecological Enhancement Areas includes off-site lands to the south of the proposed quarry which are intended to be converted to naturalized areas. Please confirm if consideration was given to retaining these lands for agricultural purposes as the quarry proposal will result in permanent loss of agricultural lands.</p>	<p>Colville provides the following response:</p> <p>The “off-site lands” to the south of the proposed quarry lands are located in Lot 4, Concession 4 of the Town of Caledon. These lands are primarily in common field crop production. There are no agricultural facilities or agricultural investments on these lands.</p> <p>The east half of Lot 14, Concession 4 is within the settlement area boundary of the Hamlet of Cataract and are not part of the Greater Golden Horseshoe’s Agricultural Land Base. They are shown as Settlement Area in the Town’s Official Plan.</p> <p>The lands in the west half of Lot 14, Concession 4 are located within the Greater Golden Horseshoe’s Agricultural Land Base and they are designated General Agriculture in the Town of Caledon’s Official Plan.</p> <p>All of the lands in Lot 14 are located outside of the proposed extraction area and will not be directly impacted by the proposed quarry.</p> <p>These lands lie directly to the north of Cataract Road, which can provide access to the lands. The lands can continue to be used for agriculture in the short term, and like any lands that have been reforested or naturalized, their capability for future agricultural uses will not be directly impacted.</p> <p>However, given their size and proximity to the existing settlement area, many agricultural uses may not be compatible with existing and future urban uses.</p>	<p>Thank you for the additional information.</p> <p>Please note, CAART Comments on the Agricultural Impact Assessment were provided to the project team in September 2024 with a response received by the Town in May 2025. The response material will be reviewed by the Town’s expert.</p> <p>Until such time as this latest material has been reviewed by the Town’s expert, this comment remains outstanding.</p>
7. b)	<p>Please confirm if aquaculture was considered for after-use of the quarry lands.</p>	<p>Colville provides the following response:</p> <p>Aquaculture is a use that CBM is familiar with and will consider as a potential after use of the Caledon Quarry operation following extraction and rehabilitation. Rehabilitated CBM pits have been used for aquaculture purposes (e.g., Aberfoyle’s McMillan Pond).</p>	<p>Noted.</p>
Archaeological Assessment			
8.	<p>As a general note, the requirement for Stage 3 Assessments should be added to the Extraction Sequence notes of the Operational Plan.</p>	<p>MHBC provides the following response:</p> <p>The Stage 3 Assessments have been completed. As a result, the archaeology notes on Drawing 3 of 4 have been updated. It is not necessary to repeat the same notes on Drawing 2 of 4 in the Extraction Sequence notes of the Operational Plan. See Attachment A for redline Site Plans dated August 2024.</p>	<p>Noted.</p> <p>Town staff is currently reviewing the Stage 3 Archaeological Assessments (dated July 10, 2024, and August 2, 2024) relevant to this application. The Town reserves the right to identify further concerns and to provide additional comments</p>

			related to the Stage 3 Archaeological Assessments and any subsequent Stage 4 Archaeological Assessments.
Transportation Impact Assessment			
9.	<p>While the Town will reserve its main comments related to traffic and transportation impact until issuance of comments under the Planning Act, please note the following.</p> <p>During pre-submission consultation with the Town, the proponent’s traffic consultant completed Terms of Reference for the Transportation Impact Assessment which included a requirement related to reviewing available collision data. The Town reiterates its concerns related to safety along the proposed haul route, particularly the adequacy of the intersection of Charleston Sideroad and Highway 10. Further review of the safety and adequacy of the haul route is required in this regard.</p>	<p>TYLin provides the following response: See Attachment D for Collision History Review Memo prepared by TYLin dated July 11, 2024. Dump truck collisions make up a very small proportion of the total collisions along the route at approximately 1.2 dump truck collisions per year during a 5-year span, despite being an active haul route that experiences elevated levels of dump truck activity. The dump truck collisions that did occur show a similar distribution of outcomes compared to regular vehicle collisions in the area Based on our findings of the available and current historical collision data for the intersections of Charleston Side Road at Hurontario Street (Hwy 10) and Charleston Side Road and Main Street (RR 136)/Cataract Road, there have been no aggregate truck collisions occurring at Charleston Sideroad and Main Street from 2017-2023 and no aggregate truck collisions at Charleston Sideroad and Highway 10 from 2022-2023.</p>	<p>Thank you for the additional information.</p> <p>Please note, CAART Comments on the Traffic Impact Study and Haul Route Assessment were provided to the project team in November 2024 with a response received by the Town in March 2025. The response material will be reviewed by the Town’s expert, Town and Regional staff and circulated to the Ministry of Transportation.</p> <p>Until such time as this latest material has been reviewed by the Town’s expert and relevant commenting agencies, this comment remains outstanding.</p>

Attachment 2

Instructions

Instructions for Applicants under the *Aggregate Resources Act*

If there are any outstanding comments with respect to an application for an aggregate licence or an amendment to lower the depth of extraction from above to below the water table, after the applicant's attempt to address them, the applicant shall serve a summary of outstanding comment(s), a summary of the applicant's attempts to address the comment(s), and the applicant's recommendations to address the comment(s), on Part 1 of this form to any person who submitted a comment and has not withdrawn their comment. The applicant shall complete Part 1 of this form and send a copy to ARAapprovals@ontario.ca, or, if email is not available, Aggregates Section, Ministry of Natural Resources and Forestry, 300 Water Street, Peterborough ON K9J 3C7.

The Objection Form shall be served on commenters by courier, registered mail, personal delivery, or, by email if consented to by the commenter. Applicants that provide their email address on Part 1 of this form consent to the commenter returning the completed form by email.

Instructions for Commenters

You have received this form because you submitted a comment to the applicant for an aggregate licence or for an amendment to lower the depth of extraction from above to below the water table and the Ministry of Natural Resources and Forestry during the consultation period and you have not withdrawn your comment. If you wish to file an objection to the application, you are required to complete Part 2 of this form and serve it on the applicant by courier, registered mail, personal delivery, or by email (if the applicant provided their email in Part 1), within 20 days of receiving the form. Send a copy of the completed form to the ministry. If there is not enough space provided, please attach a separate page with additional comments and recommendations. Any previous comments that have been submitted on an application are considered withdrawn if an objection form is not completed and sent within the 20-day deadline to both the applicant and the Ministry.

Please be aware that the Ministry of Natural Resources and Forestry may refer the application and outstanding objections to the Ontario Land Tribunal (OLT) for a decision. As an objector, you will be expected to participate in OLT case management conferences, mediation and/or hearings. Before filing an objection, you should understand the roles, responsibilities and expectations that may be placed on you by the OLT. The OLT may dismiss a proceeding without a hearing if they find the matter to be frivolous, vexatious or commenced in bad faith.

Please review the information on Part 1 and complete Part 2.

Return this Form to **both** the **Applicant** (at the address listed on Part 1) and send a copy to:
ARAapprovals@ontario.ca or if email is not available, **Aggregates Section, Ministry of Natural Resources and Forestry, 300 Water Street, Peterborough ON K9J 3C7.**

If you have questions, please contact:
Ministry of Natural Resources and Forestry,
Natural Resources Information and Support Centre (NRISC)
300 Water Street
Peterborough ON K9J 3C7
Toll free: 1-800-667-1940

Fields marked with an asterisk (*) are mandatory.

Part 1: To be completed by the Applicant

Last Name *		First Name *		Middle Initial
Le Breton		Mike		
Name of Business/Organization/Affiliation				
St. Marys Cement Inc. (Canada)				
Telephone Number		Mobile Number	Email Address	
ext.			mike.lebreton@vcimentos.com	
Mailing Address of Applicant		<input checked="" type="checkbox"/> Canada <input type="checkbox"/> USA		
Unit Number	Street Number *	Street Name *		PO Box
	55	Industrial Street		
City/Town/Municipality *		Province *	Postal Code *	Country
Toronto		Ontario	M4G 3W9	Canada

☒ Applicant Physical Address is same as above

Proposed Aggregate Site / Existing Aggregate Site Location *

(e.g. by lot and concession, local municipality, county or regional municipality, geographic township or territorial district)
Part of Lots 15 - 17, Concession 4, WSCR and Part of Lot 16, Concession 3, WSCR (former geographic Township of Caledon), Town of Caledon, Regional Municipality of Peel.

Application for a * ☐ pit ☐ quarry ☒ both ☐ amendment (insert licence number)

20-Day Response Period

Start Date (yyyy/mm/dd) *	End Date (yyyy/mm/dd) *
2025/06/06	2025/06/26

Commenter Information

Last Name *		First Name *		Middle Initial
Scott		Genevieve		
Name of Business/Organization/Affiliation				
On behalf of the Town of Caledon				
Telephone Number		Mobile Number	Email Address	
ext.			genevieve@cuestaplanning.com	
Address		<input checked="" type="checkbox"/> Canada <input type="checkbox"/> USA		
Unit Number	Street Number *	Street Name *		PO Box
	6311	Old Church Road		
City/Town/Municipality *		Province *	Postal Code *	Country
Caledon		Ontario	L7C 1J6	Canada

Table 1: In the table below, please document the outstanding comment(s), one per row, your attempts to address them, and your recommendations to resolve them.

A	B	C
Outstanding Comment(s) *	Previous Attempt(s) to Address Comment(s) *	Final Recommendation(s) to Address Comment(s) *
1. November 17, 2023, the Town of Caledon (Town) submitted comments during the Aggregate Resources Act (ARA) consultation period related to: Natural Heritage, Water Resources, Blasting, Air Quality, Noise, Agricultural Impact Assessment, Archaeological Assessment and Transportation.	<ul style="list-style-type: none">• August 13, 2024 - MHBC provided a response to Town's ARA comments.• March 24, 2025 - MHBC provided Town: Updated ARA site plans, Water Addendum Report, Geomorphology Report, Updated Best Management Practices Plan for Dust and Updated Transportation	<p>The following documents have been prepared or updated to address the Town's outstanding comments:</p> <ul style="list-style-type: none">• Water Mitigation Design Report;• Planning Addendum Report;• Updated Best Management Practices Plan for the control of dust to include an air quality monitoring

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
	<p>Impact Study and Haul Route Assessment.</p> <p>In addition to the above, as part of the Caledon Aggregate Agency Review Team (CAART) the following information has been provided to the Town:</p> <ul style="list-style-type: none"> • January 23, 2025 - GSAI provided Blasting Impact CAART Chart Responses as prepared by WSP (Chart Responses dated Jan 15, 2025). • January 23, 2025 - GSAI provided Air Quality CAART Chart Responses as prepared by WSP (Chart Responses dated Jan 22, 2025). • March 21, 2025 – GSAI provided Karst CAART Chart Responses as prepared by WSP (Chart Responses dated February 12, 2025), as well as Well Complaint Response Plan prepared by WSP (dated October 21, 2024) and Additional Hydrostratigraphic Cross Sections prepared by WSP (dated July 15, 2024). • March 21, 2025 - GSAI provided Revised Transportation Impact Study and Haul Route Assessment prepared by Tylin, with associated CAART Chart Responses (Chart Responses dated March 20, 2025). • March 21, 2025 - GSAI provided Hydrogeology CAART Chart Responses prepared by WSP (Chart Responses dated March 20, 2025) as well as Addendum Water Study prepared by WSP (dated March 2025). • May 12, 2025 – GSAI provided Agriculture CAART Chart Responses prepared by Colville Consulting (Chart Responses dated May 12, 2025). <p>In addition to the CAART process, CBM has also been meeting regularly with the Town to address cultural heritage comments on the application. Furthermore, CBM is in the process of preparing responses to the Visual, Natural Environment and Noise CAART peer review</p>	<p>plan; and</p> <ul style="list-style-type: none"> • Updated ARA Site Plans. The current version is dated May 2025 and all of the changes are shown in redline. <p>These reports and ARA Site Plans are available at the following DropBox or CBM's website at: http://www.cbmcaledonquarry.ca/assessments/index.html</p> <p>The documents will be available for download until June 30, 2025. https://www.dropbox.com/scl/fo/oe8ws5vdmpn9axg4uwt8/AB1mIlgJlFXOeA8pZwg58fvg?rlkey=3vx8o61ltd4c0laf2e687fvy7&st=bxqz93b0&dl=0</p> <p>In addition to the above:</p> <ul style="list-style-type: none"> • December 11, 2024 the Department of Fisheries and Oceans issued a letter of advice for the project (see attached); • March 7, 2025 the Ministry of Agriculture, Food and Agribusiness withdrew its objection to the application (see attached); and • June 12, 2024 Ontario Parks confirmed their comments have been addressed (see attached). <p>CBM remains committed to meet with the Town to discuss the revised application in an effort to resolve or scope any outstanding comments on the ARA application. Please let us know your availability for a meeting.</p>

A Outstanding Comment(s) *	B Previous Attempt(s) to Address Comment(s) *	C Final Recommendation(s) to Address Comment(s) *
	comments.	

Add Comment (+)

Part 2: To be completed by the Commenter

Table 2: In the table below, document any outstanding comment(s) and your recommendations for resolving it. If there is not enough space provided, please attach a separate page with additional comments and recommendations.

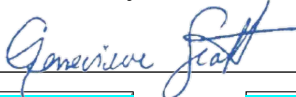
A Outstanding Comment(s)	B Recommendation for Addressing Comment
Please see the attached Town of Caledon correspondence dated June 23, 2025, for outstanding comments.	Please see the attached Town of Caledon correspondence dated June 23, 2025, for outstanding comments and the requirement for further Town of Caledon staff and peer review.

Commenters note: If you choose to participate in the *Aggregates Resources Act* notification and consultation process, all personal information you provide may be subject to the *Freedom of Information and Protection of Privacy Act* (FIPPA), whether provided to the Applicant and/or the Ministry of Natural Resources and Forestry at any point during the consultation process. The ministry collects your personal information under the authority of the *Aggregates Resources Act* and maintains it for the purposes of ensuring consultation and other requirements under the Act are met. Under the authority of subsection 11(2) or 13.1(3) of the *Aggregates Resources Act*, your name and address will form part of the public record and will appear with your objection, unless you request in your submission that your name and address be kept **confidential**. If you have any questions about the collection and use of your personal information, please contact Ministry of Natural Resources and Forestry, Natural Resources Information and Support Centre (NRISC), 300 Water Street, Peterborough ON K9J 3C7. Toll free: 1-800-667-1940.

☐ I hereby request that my name and address be kept confidential.

By signing and returning this form to the applicant and the Ministry of Natural Resources and Forestry, you acknowledge the following.

- ☒ I understand that, in submitting this form, I will be considered a formal objector to this application for a licence or to this amendment to lower the depth of extraction from above to below the water table. *
- ☒ I understand that this application may be referred to the OLT and, as an objector, I will be required to participate in case management conferences, mediation and/or hearings held by the OLT. *
- ☒ I understand that, if this application is heard by the OLT, some of my personal information may become public under the *Tribunal Adjudicative Records Act* (TARA). *

Signature of Objector


Date (yyyy/mm/dd)
2025/06/23

Save Form

Print Form

Clear Form