



CBM-Caledon Quarry

CAART COMMENT SUMMARY TABLE RESPONSE #1 – [Natural Heritage]

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

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1.	<p>a) The NER states in multiple locations that the proposed quarry will not have a negative impact on natural features, functions and the NHS. However, features and their ecological functions are being proposed for removal in their entirety.</p> <p>The existing natural heritage characterization appears to have missed, misidentified and/or incorrectly evaluated significance of some features.</p> <p>Further, policies 5.11.2.2.5 e) and k) and 5.11.2.2.6 should be addressed feature by feature.</p> <p>Detailed feature identification and assessment comments are provided below.</p> <p>b) The NER relies on progressive rehabilitation to demonstrate no negative</p>	General Comment					

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	impact to natural features, functions and the NHS.  Policy 5.11.2.2.6 only applies to select features; however, the NER erroneously applies this policy to features beyond those that are included in the policy.  Feature assessment should be reviewed to ensure its inclusion under this policy. Should it be determined that policy 5.11.2.2.6 applies, the proposed progressive rehabilitation will need to be detailed enough to demonstrate that no negative impact is achievable.						
2.	Species lists have not been displayed by feature – please include species lists (wildlife and plant) for all features proposed for removal.	General Comment					
3.	The impact assessment should be clearly laid out for each individual feature. Once that is understood, the buffers / VPZs, other mitigation and enhancement measures can then be determined. Please provide the impact assessment and proposed mitigation for each feature (e.g., features proposed for removal, adjacent features).	General Comment					
4.	Please confirm whether the methodologies applied for the 2020 field data collection are consistent with the methodologies provided by the MECP (November 20, 2023). Please clarify if / how methodologies differed and what, if any, affect that may have had on the field data results and assessment.	3.3.4 Bat Survey					
5.	Please provide transect data (since plots were not used) as well as the location of each suitable tree/snag and rock pile.	3.3.4 Bat Survey					

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6.	The number of acoustic detectors used to detect bat calls is less than that recommended by the provincial protocols (4 detectors/ha). One detector was used for Woodland C (11.7 ha); one detector was used for Woodland F (1.6 ha); one detector was used for Woodland G (9.3 ha). Given the low number of acoustic detectors, bat call data is likely underrepresented. These features are being proposed for removal; therefore, field survey effort should be sufficient to appropriately assess and mitigate the impact. Please ensure that the correct number of acoustic detectors are used to collect bat call data.	3.3.4 Bat Survey					
7.	<p>Please provide the MNR fish inventory data.</p> <p>Please provide fish data from CVC.</p> <p>These data sets should be added to the NER.</p> <p>Brook Trout and its habitat, including spawning data, have been identified by CVC in the Credit River (data sharing in process). These data should be included in the background review and carried forward throughout the report as appropriate.</p>	3.3.5 Fish and Fish Habitat					
8.	The NER states that three locations were identified as potential aquatic habitat for turtles. It is stated in 3.3.2, Anuran Call Count Survey, that suitable habitat for Jefferson Salamander was not present on site. Please provide additional information to better understand how the potential turtle habitats were not suitable for Jefferson Salamanders. Please also include the ELC for these three locations.	3.3.6.1 Turtle Habitat Assessment					

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9.	<p>It is unclear in the NER which features have been staked, which agencies were in attendance and when these site visits occurred. Please clarify / include these driplines on the figures and site plans.</p> <p>All woodlands should be staked by the Town to ensure proper policy size considerations and buffers / VPZs.</p> <p>The Town can attend a site visit to stake feature driplines for those features that have not been surveyed.</p>	3.3.7 Significant Natural Feature Boundary Delineation					
10.	<p>Table 4 provides woodland sizes for Woodlands C, F and G. Please confirm whether these features have been delineated and staked with agencies and whether this information was used to determine feature size.</p>	4.4.3 Tree Inventory					
11.	<p>Wetland Unit labels are not shown on the figures included with the NER. The ELC and feature delineation for each Unit are not shown on the NER figures. Please provide this information.</p>	4.4.4 Wetland Assessment					
12.	<p>Table 5 notes that Unit 2 is also in the adjacent forest (assumed north end of Woodland C). Please clarify whether a wetland feature was identified and delineated in the woodland. Please include this on the figure, along with ELC and feature size.</p>	4.4.4 Wetland Assessment					
13.	<p>Wetlands have been identified through MNR LIO data and through field investigations, which have been identified through ELC codes.</p> <p>The wetland assessment was completed for five wetland units that were identified through the LIO data. Wetland assessments have not been completed for those additional wetlands identified</p>	4.4.4 Wetland Assessment					

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	during field investigations. Some of these wetlands that were identified during field investigations are immediately adjacent to, and contiguous with, the LIO wetlands.  Also, some ELC units, such as FOD8-1, could be considered a wetland when applying OWES identification and delineation. These communities should be updated using the OWES criteria and surveyed with the Town during the appropriate seasonal window.						
14.	Please provide the call count data for each round of surveys.  Please include the ELC delineations and vegetation community codes for each station.	4.5.1 Amphibians					
15.	Barn Swallow have been downlisted to special concern on the SARO list. Therefore, as correctly stated, it no longer receives provincial protection; however, it does now fall within the SOCC type of SWH. Please ensure that this species is assessed as confirmed SWH.	4.5.2 Breeding Birds  Significant and Sensitive Species					
16.	Table 8 provides snag densities; please provide the transect data, along with the snag and rock inventory points.  Table 8 notes that BH#4 Woodland C (FOD5-7) is a young deciduous woodland; however, based on historical imagery, it appears to have been a mature woodlot in the 1950s. It is more likely that sections of this woodlot contain trees >100 years old. Table 3 summarizes this woodlot as mature with the dbh of some trees measuring up to 50 cm and occasional snag trees. Please update feature and habitat characterization in Table 8. This information should be	4.5.3.1 Habitat Assessment					

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	applied in the assessment of significance (please update) and for rehabilitation purposes.						
17.	Similar to BH#4, BH#6 Woodland F (FOD5-2) is noted as being a young deciduous woodland; however, it appears to be a mature woodlot in the 1950s, with sections of the woodlot containing trees >100 years old. Table 3 summarizes this woodlot as mature with the dbh of some trees measuring up to 50 cm and occasional snag trees. Please update feature and habitat characterization in Table 8. This information should be applied in the assessment of significance (please update) and for rehabilitation purposes.	4.5.3.1 Habitat Assessment					
18.	BH#3 is not shown on the figures. Please include label on figure.	4.5.3.1 Habitat Assessment					
19.	Based on comments provided by the MECP (November 2023), there has been no clarification or verification of the assessment applied to roosting activity of bats. If anything, the guidance provided by the MECP speaks to the continued uncertainties and unknowns about (SAR) bat habitat; therefore, this assessment approach appears to be unsupported and should not be applied to the assessment of habitat significance (SAR or SWH). Even with a low number of acoustic detectors, there is evidence that these features (with the exception of 1A) are providing SAR bat habitat and bat maternity colonies SWH. Please revise accordingly.	4.5.3.2 Acoustic Survey  Significant and Sensitive Species					
20.	WC#5, WC#8 and WC#9 are not shown on Figure 3; please revise.	4.5.4 Fish and Fish Habitat					

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	<p>Due to relying on MNR and CVC fish data (see comment 7), all Fish Habitat features (WC##, Trib##, Pond##) should be updated to include fish data. One visual field survey is not considered appropriate to determine fish absence.</p> <p>Brook Trout and its habitat, including spawning location data, should be included (once received from CVC).</p>						
21.	<p>One component of suitable salamander habitat includes the presence of water that remains into the summer. Table 11: Turtle Habitat Assessment Results indicates that the stations were not suitable for turtle habitat; however, some of the station descriptions do indicate that water was present into the summer. Other stations note 'insufficient water'; please clarify what this means (e.g., hydroperiod, depth). Please discuss the suitability of these areas in consideration of salamanders and breeding habitat.</p>	4.5.5 Other Wildlife and Wildlife Habitat  Turtles					
22.	<p>The NER and its figures do not show the Wetland Unit locations or ELC. Please include the location of each of the five identified wetland units, as well as the corresponding ELC and wetland size in ha.</p>	5.3 Significant Wetlands					
23.	<p>The NER states that no significant wetlands are on the Site; however, unevaluated wetlands have been identified in the LIO data and confirmed during field surveys.</p> <p>The PPS does not permit development in a PSW. Unevaluated wetlands, once evaluated, may meet the definition of a PSW (OWES 2022).</p> <p>Each wetland unit should be identified on a Figure, including its size. These feature</p>	5.3 Significant Wetlands					

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	<p>boundaries should be surveyed in the field (the Town should be present when surveying feature boundaries) and evaluated using OWES (MNRF 2022).</p> <p>The Town OP includes Wetland Core Areas, which include more than PSWs. These policies should be addressed for those wetland features that are not provincially significant.</p>						
24.	<p>The MNR correspondence states that the Coulterville Wetland evaluation record is considered older and that it should be updated with any recent info on SAR or other significant species. There is potential that this could be a PSW upon re-evaluation. Please treat as a PSW with a 30 m VPZ (no touch) or conduct an OWES evaluation record to determine current designation and corresponding assessment. Additional comments are provided under separate cover specific to the Wetland Assessment Technical Memorandum (WSP July 17, 2024).</p>	5.3 Significant Wetlands					
25.	<p>Wetlands are considered KNHFs and KHF's in the Greenbelt Plan. Please revise to include wetlands (not just significant wetlands), as these should be identified and brought forward in the impact assessment.</p>	5.3 Significant Wetlands					
26.	<p>Woodland sizes have not been included on any figures or in any of the assessment tables. Please include woodland size in ha.</p> <p>It is understood that woodland features have not been staked, this should occur with the Town to confirm boundaries and size.</p>	5.4 Significant Woodlands					
27.	<p>The NER states that there are no significant woodlands on the Site (according to provincial criteria Appendix G, Table 1). Based on the information</p>	5.4 Significant Woodlands					



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	provided in the NER, all Woodlands, except for Woodland A, meet the provincial criteria for significance. Please revise.						
28.	Woodland D has been delineated incorrectly; please include the CUP3-1.	Figure 5					
29.	Woodland H is part of Woodland E; please update.	Figure 5					
30.	<b>Appendix G, Table 2</b> references Section 2.3.2.3 of the Region’s OP (2021). The OP has since been updated, and the section is now 2.14.13 in the 2022 OP. (editorial comment)	Appendix G, Table 2					
31.	<b>Appendix G, Table 3:</b> Woodland E meets the definition of Woodland Core Area; please revise. Woodlands C and G should be revised, as they both meet the Age criteria and Woodland C also contains SAR bats.	Appendix G, Table 3					
32.	<b>Appendix G, Table 4:</b> Assessment of Natural Area and Corridors Woodlands under the Region of Peel Official Plan.  <b>Woodland C</b> already meets the definition of Woodland Core Area according to Table 3; therefore, it should be removed from the Table 4 assessment.  <b>Woodland F</b> meets an additional criterion: - Age: contains >0.5 ha of trees that may be >100 years in age.  <b>Woodland G</b> already meets the definition of Woodland Core Area according to Table 3; therefore, it	Appendix G, Table 4					

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	should be removed from the Table 4 assessment.  Please revise.						
33.	Please clarify whether the updated draft ANSI provided by the MNRF was used in the NER. If it has not been applied, please revise figures and report to reflect updated boundaries.	5.6 Significant ANSIs					
34.	The NER states that there are no SWH types on the Site; however, Eastern Wood-pewee (a SOCC) is present in Woodlands C, F and G. Barn Swallow (a SOCC) is present with confirmed nests in various sheds and barns. Please update the report to reflect these confirmed SWH types.	5.7 Significant Wildlife Habitat					
35.	Maternity bat roosting habitat is present within Woodlands C, F and G, and the minimum thresholds of acoustic calls were met for these woodlands as well. Please revise. This section should be revised once the correct acoustic methods are applied (see comment 6).	5.7 Significant Wildlife Habitat					
36.	The list of the KNHFs and KHFs identified within the extraction limit, licenced area and adjacent lands is incomplete based on the revised characterization and assessment of features in the sections above. Please revise to include those features (e.g., woodlands, wetlands, fish habitat) that are within the proposed extraction limit, the licenced area and adjacent lands.	5.8 Greenbelt Plan Natural Heritage Features					
37.	The NER states that mineral aggregate extraction may be permitted within non-significant wetlands where it is demonstrated the feature can be replaced. See comment 35.	5.8 Greenbelt Plan Natural Heritage Features					

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	<p>As also noted in the NER, the wetland proposed for removal is currently an unevaluated wetland. This wetland should be evaluated under OWES to determine its provincial designation prior to assuming its removal and replacement.</p> <p>Also note that policy 5.11.2.2.6 d) addresses Other Wetlands. This policy should be addressed.</p>						
38.	<p>Core Areas are defined in the Region's OP in section 2.14.12 and 2.14.13. Based on these policies, one Core Area, Woodland D, extends into the proposed extraction limit (Woodland D has been mapped incorrectly; please revise to include the CUP3-1). Mineral aggregate extractions are not permitted in Core Areas. Please revise.</p>	<p>5.9 Region of Peel Natural Heritage Features</p>					
39.	<p>The NER identifies SAR habitat for Little Brown Myotis and Eastern Small-footed Myotis, Bobolink and Eastern Meadowlark. It also assesses the significance of the SAR habitat. Significance determination of SAR habitat is not recognized or supported in the Town's OP.</p> <p>The definition of habitat of endangered species and threatened species no longer includes 'Significant' in the PPS. The Town both considers and implements the habitat as per the ESA and the PPS.</p> <p>Significance assessments should be removed from habitat of threatened and endangered species. These features are confirmed and should be assessed for potential impacts.</p>	<p>5.9 Region of Peel Natural Heritage Features</p>					

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40.	NACs are defined in section 2.14.18 of the Region's OP, in particular a, b, c, d, f. Features include Woodlands C, F, G; Wetland Unit 2; SAR habitat for BOBO, EAME, SAR bats. Please revise accordingly.	5.9 Region of Peel Natural Heritage Features					
41.	PNACs are defined in section 2.14.19. Features include Woodland A and Wetland Units 1 and 4. Please revise accordingly.	5.9 Region of Peel Natural Heritage Features					
42.	EPAs are defined as 'all Natural Core Areas and Natural Corridors within the Town of Caledon, as outlined on Table 3.1 of this Plan'. Based on this definition, EPAs (and therefore Natural Core Areas and Natural Corridors) are present, including within the proposed extraction limit (e.g., Woodlands C, D, F & G; Wetland Units 1 & 2; SAR habitat – grassland birds and bats; SWH (birds and bats); all KNHFs, KHF's and their related VPZs. Please update the report to include each feature within the extraction limit, the site and the study area.	5.10.1 Environmental Policy Areas / 5.10.2 Natural Core Areas and Natural Corridors					
43.	The Cataract Southwest PSW is a small complex of 10 kettle wetlands with a catchment basin of ~203 ha. Please clarify where the catchment area is in relation to the proposed extraction.	5.10.1 Environmental Policy Areas / 5.10.2 Natural Core Areas and Natural Corridors					
44.	Town OP policy 5.11.2.2.6 c) speaks to mineral aggregate operations being permitted in Woodland Core Areas and Other Woodlands, providing several conditions can be demonstrated. Please clarify if / how this applies to the existing features.	5.10.1 Environmental Policy Areas / 5.10.2 Natural Core Areas and Natural Corridors					

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45.	Based on comments provided by the MECP, there has been no clarification or verification of the assessment of significant habitat for BOBO, EAME, or SAR bats. If anything, the guidance provided by the MECP speaks to the continued uncertainties and unknowns about SAR bat habitat; therefore, the assessment of SAR habitat in the NER is unsupported. Therefore, these areas meet the definition of Natural Core Areas (as a KNHF and as SAR habitat); please revise.	5.10.1 Environmental Policy Areas / 5.10.2 Natural Core Areas and Natural Corridors					
46.	As per earlier comments, all assessed features meet the definition of Natural Core Areas (with the possible exception of Woodland A) due to being one or a combination of the following: KNHF, KHF, SAR habitat (significance assessment provided in the NER is not supported by the MECP) and/or SWH. Please revise.	5.10.3 Supportive Natural Systems and Natural Linkages					
47.	<p>Groundwater and surface water details and information is discussed in the impact analysis section with regards to Fish, Fish Habitat, Wetlands and Valleylands. Please provide 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 at each operational phase, rehabilitation and post-rehabilitation.</p> <p>Please include details on the location and extent of the groundwater zone of influence and those natural features that are within that area (this includes features identified during desktop review that exists beyond the property boundaries).</p>	6.0 Impact Analysis					

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48.	The VPZ should be 30 m from fish habitat. Please revise.	6.2.1 Tributary #1/Pond					
49.	Please explain the impact of a reduced flow in Tributary #1. Though Tributary #1 and the Pond were characterized as low potential for fish habitat, fish were observed in the pond during field investigations. Therefore, there could be a negative impact to the fish and fish habitat if there are reduced flows. Please clarify the extent of the impact and how impacts will be avoided or mitigated.	6.2.1 Tributary #1/Pond					
50.	<p>The NER notes that impacts to the Credit River Main Branch and Erin Branch are anticipated (increase in catchment and decrease in catchment, respectively). A slight increase in water surplus within the site during its operation and a slight decrease in water surplus within the site upon rehabilitation. Please explain how no impacts to fish or fish habitat are expected during each operation phase.</p> <p>Brook Trout, a sensitive coldwater species, habitat is confirmed in the Credit River in close proximity to the proposed quarry (see comment 7). Temperature impact assessments should be addressed in the NER.</p>	6.2.2 Credit River					
51.	<p>Water will be discharged via pipe to the Osprey Valley Golf Course. Please provide information regarding the existing, during and post-operational discharge timing, volumes and duration; how/if storage capacity will accommodate the quarry discharge; and any changes to base flows as the water enters the Credit River.</p> <p>Brook Trout, a sensitive coldwater species, habitat is confirmed in the Credit River in close proximity to the proposed</p>	6.2.2 Credit River					

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	quarry (see comment 7). Temperature impact assessments should be addressed in the NER.						
52.	Please clarify the location and extent of the existing, during and post-operation catchment areas for the Cataract Southwest PSW and the Credit River at Alton PSW in relation to the proposed extraction limit and licence boundary. Please discuss the effectiveness of the proposed infiltration trench system and slurry wall.	6.3 Significant Wetlands					
53.	The final paragraph in this section of the NER implies that there will be negative impacts on the PSWs unless the adaptive management, mitigation and best management practices, along with the proposed enhancements are implemented. Please clarify the extent of the impacts to better understand the appropriate means to mitigate and ensure no negative impact. Please discuss the effectiveness of the proposed infiltration trench system and slurry wall.	6.3 Significant Wetlands					
54.	<p>The unevaluated wetland (Unit 1) should be evaluated using the current OWES to determine significance given the proposed removal of the feature.</p> <p>The removal of a key hydrologic feature, which includes other wetlands, is considered an impact. Please revise and address appropriate policies.</p>	6.4 Other Wetlands					
55.	Please provide the ecological justification for a 10 m VPZ. A VPZ, in its entirety, must be maintained as natural self- sustaining vegetation (not just a portion of it).	6.4 Other Wetlands					
56.	Portions of the proposed extraction limit overlap with the catchment area of the Coulterville Wetland Complex, and the	6.4 Other Wetlands					

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	catchment area will be returned to existing conditions upon rehabilitation. Impact to features should be assessed during operation phasing, as well as at post-rehabilitation phase. Please explain how the reduction in catchment area for the duration of the extraction will not negatively impact the Coulterville Wetland Complex.						
57.	Woodlands will need to be updated based on all comments above that address section 5.4, Appendix G and Figure 5. VPZs should then be revised accordingly.	6.5 Significant Woodlands					
58.	The NER states that extraction is set back a minimum of 15 m from Woodlands B and D, and a 10 m VPZ will be implemented. Please provide the ecological justification for a 10 m VPZ. Please note that the VPZ is established to achieve and be maintained as natural self-sustaining vegetation (Greenbelt Plan section 3.2.5.5b).	6.5 Significant Woodlands					
59.	Woodlands will need to be updated based on all comments above that address section 5.4, Appendix G and Figure 5. Woodland A appears to be the only woodland classified as 'Other'. VPZs should then be confirmed / revised, along with proposed mitigation.	6.6 Other Woodlands					
60.	Please provide the distance from the closest points of the proposed limit of extraction to the feature. Please clarify the catchment area, base flows, drawdown, etc. of the feature, and what, if any impacts could occur from the proposed extraction.	6.7 Significant Valleylands					



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61.	Please revise this section to remain consistent with the comments and revisions noted in the SWH sections above. SWH (bat maternity colonies; habitat for SOCC - EAWP, BARS, WOTH, possibly terrestrial crayfish) will be removed and therefore negatively impacted. Please revise the impacts and mitigation.	6.9 SWH					
62.	<p>The Town of Caledon OP (section 5.11.2.2.6) permits aggregate operations within and adjacent to certain EPAs (i.e., other wetlands, woodland core areas and other woodlands, features that are solely SWH, etc.) providing certain conditions, including that it can be demonstrated that ecological attributes, functions and linkages will be retained and/or replaced through progressive rehabilitation; that progressive rehabilitation will result in an equal or greater amount of feature size and function in as short as a time as is feasible (with some exceptions for below water table extraction); and that there will be no immediate, long term or cumulative negative impacts on the Greenlands System.</p> <p>Should this Town policy be appropriate for the revised natural heritage characterization, it will be critical that the progressive rehabilitation plan be presented with more detail to address not only the progressive rehabilitation policies in the OP and the GBP, but also to demonstrate that there will be no negative impact from the removal of a feature. While this section of the NER provides some details, more information is needed, such as:</p> <p>- monitoring program and reporting; monitoring recommendations</p>	7.0 Rehabilitation / Mitigation / Monitoring					

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	as provided in the Karst Peer Review (GMBLuePlan May 10, 2024); adaptive management reporting; timelines, etc.;  - the operational phasing should also be applied to each step of the progressive rehabilitation details;  - progressive rehabilitation should commence well before any feature removals – these timelines should be included in the rehab plan.						
63.	The NER includes four goals to be achieved by the proposed rehabilitation plan. Please include further information on how each goal will be measured and achieved, as well as an associated timeline for each.	7.0 Rehabilitation / Mitigation / Monitoring					
64.	Rehabilitation goals should also include those set out in the Caledon OP. Please clarify how the progressive rehabilitation goals will be appropriately addressed, including how the rehabilitation will be progressive, timely and minimize the extent of the disturbed area (section 5.11.2.4.3 c) and how it conforms to section 5.11.2.8 of the OP.	7.0 Rehabilitation / Mitigation / Monitoring					
65.	Rehabilitation goals are also provided in sections 4.3.2.5 and 4.3.2.6 of the Greenbelt Plan and should be included in the progressive rehabilitation plans.	7.0 Rehabilitation / Mitigation / Monitoring					
66.	As noted in the NER, Barn Swallows may use nests from pervious years. It is therefore recommended that even ‘inactive’ nests should not be removed during the nesting season.	7.2.2 General Best Management Practices					
67.	The VPZ should be 30 m from fish habitat. Please revise.	7.2.4 Fish Habitat					

	Initial CAART Comments (Date)	Page / Section	Applicant Response (Date)	CAART Response (Date)	Applicant Response (Date)	CAART Response (Date)	Applicant Response
Report: Natural Environment Report Proposed Caledon Pit / Quarry (December 2022; revised July 2023) Author: Golder Associates Ltd. Member of WSP							
68.	The NER states that a 10 m vpz will be applied to the Coulterville Wetland. As indicated above, based on MNRF recommendation, the Coulterville Wetland should be re-evaluated using OWES. A minimum 30 m VPZ is standard practice from a feature that is a component of the Greenbelt NHS. Please revise to reflect a 30 m VPZ, which includes no disturbance.	7.2.6 Other Wetlands					
69.	The VPZ for unevaluated wetland units 3, 4 and 5 should be 30 m and include no disturbance. Please revise from 10 m.	7.2.6 Other Wetlands					
70.	The NER states that a 15 m VPZ will be applied to the significant woodlands B and D. A minimum 30 m VPZ is standard practice from a feature that is a component of the Greenbelt NHS. Please revise to reflect a 30 m VPZ, which includes no disturbance.	7.2.7 Woodlands					
71.	The NER notes that the use of heavy machinery should be minimized within 10 m of the dripline; however, this section also notes that there will be no disturbance within 10 m of the significant woodlands. Please revise to ensure no machinery is within 10 m of the dripline. A 30 m VPZ should be applied adjacent to the Greenbelt NHS and include no disturbance (including the use of heavy machinery). Please revise.	7.2.7 Woodlands					
72.	Summary and Recommendations Sections 8.0 & 9.0 should be updated once comments are addressed. These sections will be reviewed upon receipt of updated materials (e.g., NER, figures, site plans, etc.).	8.0 Summary & 9.0 Recommendations					

