

February 12, 2025

Town of Caledon
611 Old Church Road
Caledon, ON L7C 1J6

RE: Peer Review of Natural Environment Report and Wetland Assessment Technical Memorandum for the Proposed Caledon Pit / Quarry

To: Harsh Padhya and Genevieve Scott,

North-South Environmental (NSE) was retained by the Town of Caledon (Town) to prepare a natural heritage peer review of the Natural Environment Report (NER) for the proposed Caledon Pit / Quarry (Golder - Member of WSP December 2022 [Revised July 2023]).

Subsequent to the peer review of the NER, the Town came into receipt of the Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry Technical Memorandum (WSP July 17, 2024) (Wetland Assessment) and requested NSE prepare a natural heritage peer review.

The following provides a high-level summary of each report. Due to the volume of peer review comments on the NER, they are provided in the CBM-Caledon Quarry CAART Comment Summary Table Response #1 (attached).

Technical comments on the wetland assessment are provided directly within.

Natural Environment Report for the proposed Caledon Pit / Quarry

In addition to reviewing the NER, we reviewed the following documents to inform our comments:

- Caledon Pit & Quarry Site Plans (Existing Features; Operation Plan; Technical Recommendations; Rehabilitation Plan) (MHBC August 2023)
- Peer Review of Hydrogeological Reporting Proposed CBM Caledon Pit & Quarry (ARL Groundwater Resources Ltd. December 5, 2024)

We also referred to the following information and documents to support our review:

- Current and historic aerial imagery
- Provincial mapping (Land Information Ontario natural heritage mapping and aquatic resource line segment mapping, Source Protection Mapping)

- Natural Heritage Information Centre (NHIC) species records in proximity to the subject property
- Department of Fisheries and Oceans Aquatic Species at Risk data
- Town of Caledon Official Plan (2018)
- Peel Region Official Plan (2022)
- Greenbelt Plan (2017)
- Provincial Planning Statement (2024)

Understanding of the Application

The proposed operation will occur on lands owned and controlled by CBM at the northwest, northeast and southwest intersection of Regional Road 24 (Charleston Sideroad) and Regional Road 136 (Main Street) in Caledon. Approximately 261 ha are proposed to be licensed under the *Aggregate Resources Act*.

Overall Summary of NER Peer Review

In general, the NER is proposing to remove features and significant features in their entirety, yet it states that these removals will not result in negative impacts and are supported by policy.

The existing natural heritage characterization (e.g., identification of features and boundaries) and the assessment of significance (e.g., what to assess and how to assess) require revisions. Feature omissions and incorrect delineations have misinformed assessments of significance. Without correctly identified or assessed natural features, the impact assessment has not been completed appropriately, and therefore, the proposed progressive rehabilitation and restoration measures will not adequately address the proposed impacts. Finally, policy conformity conclusions will also require revision.

More details are required to better understand the proposed impacts to the ecology of water-reliant features such as wetlands, watercourses and fish habitat. The NER does not address or quantify the proposed impacts to catchment areas, water depths, hydroperiods, etc. and how these could impact the natural features and functions (e.g., vegetation composition, breeding habitat, fish presence and use, etc.) within the study area and groundwater zone of influence.

Detailed comments are provided in the CAART Comment Summary Table Response #1.

At this time, a natural heritage peer review has not been prepared for the proposed Site Plans. Once the peer review comments have been addressed, site plan revisions will be necessary. A natural heritage peer review will be completed at that time.

Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry

In addition to reviewing the Wetland Assessment, we reviewed the following documents to inform our comments:

- Natural Environment Report for the proposed Caledon Pit / Quarry (Golder – Member of WSP December 2022 [Revised July 2023])
- Peer Review of Hydrogeological Reporting Proposed CBM Caledon Pit & Quarry (ARL Groundwater Resources Ltd. December 5, 2024)

We also referred to the following information to support our review:

- Current and historic aerial imagery
- Provincial mapping (Land Information Ontario natural heritage mapping and aquatic resource line segment mapping, Source Protection Mapping)

Overall Summary of Wetland Assessment Peer Review

The Wetland Assessment was prepared using OWES (MNR 2022) for five wetland units identified in the MNR LIO wetland data. The Wetland Assessment initially characterized each wetland unit to determine whether it should be evaluated. Of the five wetland units, two were evaluated.

Overall, the wetland mapping and evaluation is incomplete and not in accordance with OWES.

The five LIO MNR wetland units (Units 1 through 5), were reviewed, and two of these units (Units 3 and 4) were evaluated.

However, additional wetland communities were identified in and adjacent to the study area during field surveys: White Cedar Mineral Coniferous Swamp (SWC1-1), Mixed Swamp (SWM), Poplar-Conifer Mineral Mixed Swamp (SWM3-2) and Willow Mineral Thicket Swamp (SWT2-2).

The SWC1-1 and the SWT2-2 communities were identified within and adjacent to Units 3 and 4; however, these contiguous wetland communities were not included in the assessment.

The SWM and SWM3-2 communities were identified north and immediately adjacent to the proposed license boundary. These wetland communities overlap and expand beyond the Coulterville Wetland Complex, which is evaluated non-provincially significant. As noted in MNR correspondence (Appendix B of the NER), the Coulterville Wetland evaluation is older and should be updated with any recent information on species at risk and other significant species. In addition to this provincial direction, a Moist-Fresh Aspen-Poplar Deciduous Forest (FOD8-1) community has been identified adjacent to and among the MNR and ELC wetland units / communities. Moist-Fresh ELC communities can meet the definition of wetland under OWES and should be verified.

Based on the above, wetland community verification (FOD8-1), boundary delineations (all), size calculations (all) and bat acoustic survey data (all) have not been surveyed for and are currently unknown. Breeding bird point count results, in particular for CBBS17-CBBS20, should be provided.

This data should be included and assessed in a revised Wetland Assessment report.

Regarding wetland reviews for Units 1, 2 and 5, the conclusions state that each does not meet the definition of a wetland and does not meet the size criterion. Based on the information provided in the Wetland Assessment, these three Units do, in fact, meet the definition:

- Wetland Unit 1: OWES states that “land which is under agricultural use, but has retained all three defining characteristics of a wetland (e.g., related to water, soil/substrate and vegetation), is still considered to be (a wetland)”. Unit 1 is seasonally flooded; has hydric soils and contains over 50% wetland vegetation.
- Wetland Unit 2: The description of the feature seems to indicate that the vernal pool and swamp meet the vegetation criteria of a wetland. It is also unclear how/why the vernal pools were assessed separately from the swamp community. Under OWES, these are considered a single wetland.
- Wetland Unit 5: The description notes that this unit is a meadow marsh with wetland obligate and facultative species that is connected to the Coulterville Wetland (which states that this wetland is a PSW – please address). This unit is seasonally flooded, has hydric soils and contains over 50% wetland vegetation. Therefore, this is considered a wetland under OWES, that is hydrologically connected to the Coulterville Wetland. This wetland unit should be evaluated.

In addition to the need for wetland community verification (FOD8-1), boundary delineation (all), size calculations (all), bat acoustic survey data (all) and breeding bird point count results, fish species data is inconsistent / missing both in the Wetland Assessment and the NER. Therefore, the fish data should be revised as needed prior to completing the re-assessment.

The wetland communities identified during field investigations should be evaluated, and wetland Units 3 and 4 should be re-evaluated, due to the amount of unknown data that is relevant to the evaluation and is in accordance with OWES.



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