TOWN OF CALEDON

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**.

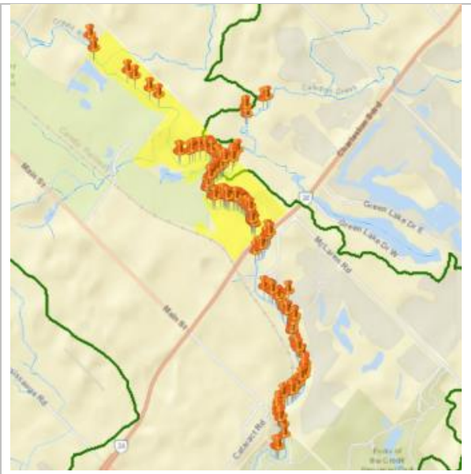
Colour Code	Description
	Resolved
	Resolved subject to additional information being provided to CAART Reviewers (e.g, Implementation Guide, Report Addendums)
(no colour)	Response provided, but no further action taken or required by Project Team

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
1.	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. The existing natural heritage characterization appears to have missed, misidentified and/or incorrectly evaluated significance of some features. Further, policies 5.11.2.2.5 e) and k) and 5.11.2.2.6 should be addressed feature by feature.	General Comment	The impact assessment for each feature is summarized in the attached "Natural Feature Impact Summary Table".				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	Detailed feature identification and assessment comments are provided below. b) The NER relies on progressive rehabilitation to demonstrate no negative 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	Additional tables identifying species lists for all features proposed to be removed is provided as an addendum to this response. . (See Appendix B for updated Tables).				
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	The impact assessment for each feature is summarized in the attached “Natural Feature Impact Summary Table”.				
4.	Please confirm whether the methodologies applied for the 2020	3.3.4 Bat Survey	Field surveys followed methods from the applicable provincial guidance documents available at the time of the 2020 surveys, which included the*:*				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	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.		*MNR (Ministry of Natural Resources). 2017. Survey Protocol for Species at Risk Bats within Treed Habitats, Little Brown Myotis, Northern Myotis and Tri-Colored Bat. Guelph District.* A complementary bat habitat assessment was conducted on March 27, 28, and April 4, 2025, to complete detailed mapping of snag/cavity trees in Woodlands C, F, and G as requested by MECP. Surveys were conducted during the leaf-off period and were completed using the following protocols: *MNR (Ministry of Natural Resources). 2015. Technical Note: Species at Risk (SAR) Bats. MNR, Aurora District.* *MECP (Ministry of Environment Conservation and Parks). 2021. Survey Protocol for Species at Risk Bats with Treed Habitats Little Brown Myotis, Northern Myotis and Tri-Colored Bat. MECP, Aurora District.* *MECP (Ministry of Environment Conservation and Parks). 2022. Species at Risk Bats Survey Note Technical Note: Treed Habitats – Maternity Roost Surveys. MECP, Midhurst District* Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment (June, 2025).				
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	A complementary bat habitat assessment was conducted on March 27, 28, and April 4, 2025, to complete detailed mapping of snag/cavity trees in Woodlands C, F, and G. Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment (June 2025).				
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	3.3.4 Bat Survey	Based on the 2020 habitat assessment and snag density calculation, Woodland C (0.8 snags/ha), Woodland F (2.4 snags/ha) and Woodland G (2.6 snags/ha) did not reach the threshold of 10 snags/ha considered to be high-quality habitat according to the 2017 protocols. However, an acoustic detector was still placed near these woodlands as a conservative measure. A complementary bat habitat assessment was conducted on March 27, 28, and April 4, 2025, to complete detailed mapping of snag/cavity trees in Woodlands C, F, and G. Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment (WSP 2025) attached. Bat habitat assessment is subject to an on-going iterative review process with the MECP.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	detectors are used to collect bat call data.						
7.	Please provide the MNR fish inventory data. Please provide fish data from CVC. These data sets should be added to the NER. 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.	3.3.5 Fish and Fish Habitat	MNR fish data was provided in Section 4.5.4 of the NER. A broader search of fish data includes a consolidated list of the following species for the Study Area: American Brook Lamprey, Blacknose Dace, Bluntnose Minnow, Brassy Minnow, Brook Stickleback, Brook Trout, Brown Bullhead, Brown Trout, Carps and Minnows, Central Mudminnow, Common Shiner, Creek Chub, Fantail Darter, Fathead Minnow, Golden Shiner, Goldfish, Iowa Darter, Johnny Darter, Lampreys, Largemouth Bass, Longnose Dace, Mottled Sculpin, Northern Hog Sucker, Northern Pearl Dace, Northern Pike, Northern Redbelly Dace, Pumpkinseed, Rainbow Trout, Sunfishes, Rainbow Darter, River Chub, Rock Bass, Slimy Sculpin, White Sucker. Information provided by Credit Valley Conservation was obtained through a data sharing agreement and included the following files, which are available from CVC directly in Excel format: ▪ Credit River Watershed Species List ▪ Fish Sampling Records In addition to the MNR data, CVC data includes: Atlantic Salmon, Northern Hog Sucker and Black Crappie from subwatershed 15 and 18, of which the latter two were included in species list presented in Section 4.5.4. CVC has indicated that since 1997, they have recorded Brook Trout redd data in the Credit River in the proximity of the proposed pit/quarry (see map below). Brook Trout spawning was known to be present and was considered in the fisheries assessment and recent DFO consultation. The impact analysis of the Credit River is expanded upon under responses 50, 51 and 74.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
			 CVC Redd data				
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	Only historical records of Jefferson Salamander were identified during the background review and SAR screening. Further, Jefferson Salamander was not flagged as a species of concern by MECP or MNR through the information request for the Project. However, a habitat assessment was completed within the Study Area as a conservative measure. The ELC communities associated with each of the turtle habitat survey stations (as shown on Figure 2 Revised 2025) are as follows: ▪ T#1 = SWM3-2 (Poplar-Conifer Mineral Mixed Swamp) ▪ T#2 = MAS2-1/MAS3-1 (Cattail Mineral / Cattail Organic Shallow Marsh) ▪ T#3 = Open water (Pond #1) Turtle habitat station T#1 is off-Site. Although the SWM3-2 community at this station was briefly flooded in the early spring, it was determined to be dry by late May. In Ontario, breeding ponds must contain water until mid to late summer, as metamorphosis from aquatic to terrestrial body form typically occurs in July or August (Linton et al. 2018). Further, no evidence of amphibian egg masses were observed in the flooded area of the swamp during habitat assessments. Turtle habitat station T#2 is off-Site. Although the marsh contained water for much of the summer, young-of-year cyprinid fish were observed in the marsh. Jefferson Salamanders avoid ponds with predatory fish. Turtle habitat station T#3 is on Site. Although the pond has permanent water, emergent vegetation, branches, and twigs was sparse contributing				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			to a lack of suitable egg-attachment sites. Small bodied (cyprinid sp.) fish were also observed in Pond #1. Jefferson Salamanders avoid ponds with predatory fish. The results of the assessment indicated that there was no suitable habitat for Jefferson salamander, and as such, surveys were deemed not to be required. Linton, J, J. McCarter and H. Fotherby 2018. Recovery Strategy for the Jefferson Salamander (*Ambystoma jeffersonianum*) and Unisexual *Ambystoma* (Jefferson Salamander dependent population) (*Ambystoma laterale - (2) jeffersonianum*) in Ontario. Ontario Recovery Strategy Series. Prepared for the Ontario Ministry of Natural Resources and Forestry, Peterborough, Ontario. vii + 58 pp.				
9.	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. All woodlands should be staked by the Town to ensure proper policy size considerations and buffers / VPZs. The Town can attend a site visit to stake feature driplines for those features that have not been surveyed.	3.3.7 Significant Natural Feature Boundary Delineation	Woodland B, D and Cataract Southwest PSW were staked in the field with CVC, the Region and the Town in October 2021. Within Woodland B, both the woodland dripline and wetland boundary were staked, where the boundaries differed. Woodlands C, F and G were not staked, as all three features are proposed for removal. A small portion of wetland adjacent to the proposed extraction area was not staked with agencies and these have since also been evaluated by WSP. These boundaries can be confirmed with the Town and CA as needed. It is notable that these wetlands that are located in the northwest corner of the proposed licence area are at the edge of active agricultural fields, and the boundary of the wetland is coincident with the cultivated farm field and easily delineated. A 30 m extraction setback will be assigned to these wetland boundaries, and the Site Plans will be updated to reflect the setback at this location. All OWES wetlands have been assigned a 30 m extraction setback regardless of evaluation status (i.e., PSW or non-PSW). CBM offers the opportunity to visit and survey the small wetland portion not previously delineated with Regulators in the northwest corner of the site that can be scheduled in 2025 (see notes Figure 1 -Ecological Land Classification and Wetland Boundary for the 2025 Assessment of Woodland B in the memorandum *CBM Caledon – Additional Wetland Assessment (Woodland B) 2025 (attached)).*				
10.	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.	4.4.3 Tree Inventory	Woodlands C, F and G were not delineated and staked with agencies, as all three features are proposed for removal. Sizes were determined based on a GIS calculation of ELC community delineation. Because all three woodlands are largely discrete features with clear boundaries, this method provided an accurate area calculation.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
11.	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.	4.4.4 Wetland Assessment	An updated figure identifying wetland units is provided as an addendum in the form of a wetland technical memorandum – *CBM Caledon – Additional Wetland Assessment (Woodland B) 2025.* Note all wetlands that met the OWES size criteria in the vicinity of the Site have been evaluated for significance and/or part of a complex in consideration of OWES (2022). As such all wetlands herein are referenced to as *'evaluated'* wetlands in the text and associated figures.				
12.	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.	4.4.4 Wetland Assessment	This Unit #2 wetland is addressed in the previously submitted Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario (WSP 2024). In addition to revised Figure 1 in the *CBM Caledon – Additional Wetland Assessment (Woodland B) 2025 (attached)* that illustrates the location of the wetland.				
13.	Wetlands have been identified through MNR LIO data and through field investigations, which have been identified through ELC codes. 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 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.	4.4.4 Wetland Assessment	WSP provides clarification regarding the five previously unevaluated wetland units completed as part of the NER and supporting documents is as follows: Wetland assessments were not completed on Units 1 (0.1 ha), Unit 2 (0.03 ha) and Unit 5 (0.12 ha) as they do not meet the size requirements for OWES evaluation (i.e., greater than 2 ha). Refer to *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024). The *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024) also indicates Units 3 and 4 do not qualify as significant based on characteristics of their combined wetland feature. However, the extraction limit has been set back a minimum of 30 m from all wetlands that meet the OWES size criteria. The Site Plans and proposed extraction limit in the northwest corner of the Site will be updated to reflect the refined wetland boundary in this area (See attached Figure 1 Ecological Land Classification and Wetland Boundary for the 2025 Assessment of Woodland B) The wetland feature SWT2-2 that has been revised and encompasses wetland units 3 and 4 (see attached Figure 1 Ecological Land Classification and Wetland Boundary for the 2025 Assessment of Woodland B) is located approximately 70 m from Coulterville Wetland Complex and is separated by an upland deciduous forest (FOD8-1) and coniferous forest (FOC 4-1). As such, this wetland community and surrounding wetlands are not considered part of the Coulterville Wetland Complex PSW based on the OWES 2022 (updated wetland evaluation WSP 2025). There are no significant wetlands on the Site. Off-Site, the Cataract Southwest PSW is located in the south portion of the Study Area in the				

Commented [KB1]: The memo suggests that the wetland located within woodland B is significant (not sure if this would be Unit #3, 4 or 5?). Isn't that on site, but outside extraction area?

Commented [HM2R1]: No - it is not one of the wetland units on the site. The wetland within woodland B is offsite.

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			Niagara Escarpment Plan area (Figure 3, NER, July 2023), which does not connect to the above-mentioned wetlands. A portion of the Credit River at Alton PSW is located off-Site, in the north portion of the Study Area along the Credit River. The FOD8-1 community in Woodland B was surveyed in May 2025 to confirm and refine wetland features and boundaries. This community was evaluated using the OWES criteria. The results are presented as an addendum item in the CBM Caledon – Additional Wetland Assessment (Woodland B) 2025 (attached).				
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	An additional table identifying call count data and associated ELC codes is provided as an appendix to this response. (See Appendix B for updated Tables).				
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	The impact assessment for barn swallow as a SOCC under SWH has been summarized in the attached "Natural Feature Impact Summary Table".				
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	4.5.3.1 Habitat Assessment	A Complementary bat habitat assessment was conducted on March 27, 28, and April 4, 2025, to complete detailed mapping of snag/cavity trees in Woodlands C, F, and G. Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment. Bat habitat assessment and SAR are subject to on-going iterative review process with MECP.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	information should be 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	A complementary bat habitat assessment was conducted on March 27, 28, and April 4, 2025, to complete detailed mapping of snag/cavity trees in Woodlands C, F, and G. Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment. Bat habitat assessment and SAR are subject to on-going iterative review process with MECP				
18.	BH#3 is not shown on the figures. Please include label on figure.	4.5.3.1 Habitat Assessment	BH#3 corresponds to the SWC1-1 near BBS station #CBBS17 (Figure 2). See attached updated Figure 2 Ecological Land Classification and Wildlife Survey Station - 'Bat Habitat Station'				
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	4.5.3.2 Acoustic Survey Significant and Sensitive Species	Please see response 6.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	and bat maternity colonies SWH. Please revise accordingly.						
20.	WC#5, WC#8 and WC#9 are not shown on Figure 3; please revise. 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. Brook Trout and its habitat, including spawning location data, should be included (once received from CVC).	4.5.4 Fish and Fish Habitat	See Updated Figure 3 – Aquatic Features and Fish Survey Stations. Additional photographs have also been provided for context of low fish habitat potential (Appendix A). The surveys confirmed that some WC# sites did not meet the criteria to classify them as 'watercourses' (WC#3 and WC#9), while others had no defined channel (WC#8, WC#6, WC#4), and thus they were conservatively considered to have low fish habitat potential. See attached photos for context. At sites where fish were observed (Pond#1 and WC#2) or there was a potential for fish (WC#1), these were considered in the assessment. RE: Brook Trout, please see response 7 and 74.				
21.	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.	4.5.5 Other Wildlife and Wildlife Habitat Turtles	Please see response 8.				
22.	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.	5.3 Significant Wetlands	See CBM Caledon – Additional Wetland Assessment (Woodland B) 2025 and associated revised figure (attached).				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
23.	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. The PPS does not permit development in a PSW. Unevaluated wetlands, once evaluated, may meet the definition of a PSW (OWES 2022). Each wetland unit should be identified on a Figure, including its size. These feature boundaries should be surveyed in the field (the Town should be present when surveying feature boundaries) and evaluated using OWES (MNRF 2022). 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.	5.3 Significant Wetlands	All unevaluated wetland units were evaluated under OWES and the confirmed boundaries delineated, and areas calculated in the previously submitted document titled *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024) and in the CBM Caledon – Additional Wetland Assessment (Woodland B) 2025 and associated revised figure (attached). See response 9 and 26 with respect to wetland delineation and wetland buffers. The impact assessment for each feature is summarized in the attached "Natural Feature Impact Summary Table". Please see response 13				
24.	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	5.3 Significant Wetlands	Please see response 13 Coulterville wetland inclusions were refined, included on a figure and the area reassessed using OWES in 2025. The results are presented in the CBM Caledon – Additional Wetland Assessment (Woodland B) technical memorandum (2025) attached.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	Wetland Assessment Technical Memorandum (WSP July 17, 2024).						
25.	Wetlands are considered KNHFs and KHFs 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.	5.3 Significant Wetlands	The impact assessment for each wetland feature, including significant and non-significant wetlands, is summarized in the attached "Natural Feature Impact Summary Table".				
26.	Woodland sizes have not been included on any figures or in any of the assessment tables. Please include woodland size in ha. It is understood that woodland features have not been staked, this should occur with the Town to confirm boundaries and size.	5.4 Significant Woodlands	See sizes of Woodlands C, F and G in Table 4 of NER. Woodlands C, F and G were not staked, as all three features are proposed for removal. Woodlands C, F and G were not staked, as all three features are proposed for removal. Woodland B, D and Cataract Southwest PSW were staked in the field with CVC, the Region and the Town in October 2021. Within Woodland B, both the woodland dripline and wetland boundary were staked, where the boundaries differed. Additional woodland staking is redundant as it has been completed, A small portion of wetland adjacent to the proposed extraction area was not staked with agencies and these have since also been evaluated by WSP. These boundaries can be confirmed with the Town and CA as needed. It is notable that these wetlands are located in the northwest corner of the proposed licence area at the edge of active agricultural fields and the boundary of the wetland is coincident with the cultivated farm field and easily delineated. A 30 m extraction setback has been assigned to these wetland boundaries and Site Plans will be updated. All wetlands have been assigned a 30 m extraction setback regardless of evaluation status (i.e., PSW or non-PSW). As noted in response #9, CBM offers the opportunity to visit and survey the small wetland portion not previously delineated with Regulators in the northwest corner of the Site that can be scheduled in 2025 (see notes Figure 1- Ecological Land Classification and Wetland Boundary for the 2025 Assessment of Woodland B.). The boundary of the wetland is coincident with the cultivated farm field and can be accurately delineated in the field during early fall.				
27.	The NER states that there are no significant woodlands on the Site (according to provincial criteria Appendix G, Table 1). Based on the information provided in the NER, all Woodlands, except for Woodland A, meet the provincial criteria for significance. Please revise.	5.4 Significant Woodlands	All four significant woodlands (i.e., Woodlands B, D, E and H) are located off-Site and outside of the extraction limit and will not be directly impacted by the proposed extraction. Further analysis is not warranted. Woodland A is mapped as a Supporting Woodland by CVC. It is located outside of the extraction limits and will not be directly impacted by the proposed extraction. Therefore, further analysis is also not warranted. The PPS, Greenbelt Plan and NEP defer to the Natural Heritage Reference Manual (NHRM) for identification and assessment of significant				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
			woodlands. The NHRM identifies four key characteristics to be evaluated for determining significant woodlands in Ontario, including woodland size, age, ecological function (e.g., interior habitat or linkages), uncommon characteristics (e.g., rare plant community) and economic and societal functional value. Woodland C, F and G are not considered significant under the PPS. They do not have any of the four key characteristics for significance, nor do they provide significant habitat for wildlife species at risk (e.g., bats). They are all proposed for removal and replaced as part of the Progressive Rehabilitation Plan. Based on the PPS, rehabilitation or replacement of features can be considered in the test of no negative impact. In this case woodland significance is not considered to influence the removal and replacement strategy set out in the NER. The PPS provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the PPS sets the policy foundation for regulating the development and use of land province-wide, helping to achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians. Under Chapter 4 of the PPS - Wise Use and Management of Resources, policies are established to guide municipalities for resources of provincial interest such as mineral aggregates (see section 4.5 Mineral Aggregate Resources). In particular Section 4.5.3 of the PPS under Rehabilitation states: Progressive and final rehabilitation shall be required to accommodate subsequent land uses, to promote land use compatibility, to recognize the interim nature of extraction, **and to mitigate negative impacts** to the extent possible. Final rehabilitation shall take surrounding land use and approved land use designations into consideration. Progressive and final rehabilitation is required, and the PPS recognizes the interim nature of extraction, and rehabilitation mitigation is useful in demonstrating no negative impacts. As such, in consideration of the PPS guidance on resources of provincial interest as it relates to removal of woodlands or provincially significant woodlands, the comprehensive rehabilitation plan at this site offers an instrument to mitigate negative impacts as guided by, and compliant with, the PPS.				
28.	Woodland D has been delineated incorrectly; please include the CUP3-1.	Figure 5	Please see response #38.				
29.	Woodland H is part of Woodland E; please update.	Figure 5	Our interpretation is that there are a number of gaps or other anthropogenic land uses that separate Woodland H and Woodland E.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
30.	**Appendix G, Table 2** 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	Acknowledgement of editorial comment which is reflected in the Natural Feature Impact Summary Table.				
31.	**Appendix G, Table 3**: 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	The Town of Caledon Woodland Core Areas should include Woodland E. However, Woodland E is not within or adjacent to the extraction area and therefore does not change the impact assessment. According to the Town of Caledon Official Plan, adjacent lands are defined as: *a) Within the ORMCPA, all lands within the ORMCP Minimum Area of Influence, and those lands described in subsections b) ii) and c) of this definition.* Woodland E is not within ORMCPA *b) Within the Greenbelt Plan Protected Countryside, all lands within 120 metres of a Key Natural Heritage Feature within the Natural Heritage System and all lands within 120 metres of a Key Hydrologic Feature anywhere within Protected Countryside, and those lands described in subsections c) ii) and d) of this definition; or,* Woodland E not a Key Natural Heritage Feature within the Greenbelt Natural Heritage System or Key Hydrologic Feature *c) In relation to wetlands:* *i) those lands within 120 metres of an individual wetland area; and* *ii) all lands connecting individual wetland areas within a wetland complex.* Woodland E not a wetland *d) In all other instances:* *i) lands abutting Environmental Policy Area;* *ii) lands which include Supportive Natural Systems and Natural Linkages contiguous to Environmental Policy Area; and,* *iii) lands having a probable functional relationship with Environmental Policy Area.* Woodland E does not abut an Environmental Policy Area within development footprint, is not contiguous to an Environmental Policy Area within development footprint, nor does it have any probable functional relationship to an Environmental Policy Area within development footprint. Woodlands C (approximately 10.5 ha) and Woodland G (6.9 ha) have been re-evaluated based on Town of Caledon Woodland Core Areas				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			criteria, Appendix G, Table 3 of the NER, and determined to be of Woodland Core Area. The updated designation is based on the results of a complementary assessment of bat habitat conducted on March 27, 28, and April 4, 2025. Specific changes in significance designation occurred in two categories based on the Towns criteria: ▪ **Rare Species:** Woodlands C and G are now noted to contain high-quality SAR bat habitat. Results are to be provided in a Bat Snag technical memo. ▪ **Age:** During the above survey, trees greater than 50 cm dbh were observed; therefore, the woodland contains trees that are expected to be over 100 years old. Woodlands E, C and G are be identified as the Core Woodland Area in the Natural Feature Impact Summary Table.				
32.	**Appendix G, Table 4**: Assessment of Natural Area and Corridors Woodlands under the Region of Peel Official Plan. **Woodland C** already meets the definition of Woodland Core Area according to Table 3; therefore, it should be removed from the Table 4 assessment. **Woodland F** meets an additional criterion: ▪ Age: contains >0.5 ha of trees that may be >100 years in age. **Woodland G** already meets the definition of Woodland Core Area according to Table 3; therefore, it should be removed from the Table 4 assessment. ??? Please revise.	Appendix G, Table 4	**Appendix G, Table 2** evaluates Core Woodlands as defined by the Region of Peel Official Plan. Under the Region's Official Plan, there is a definition of Core Woodlands for the purposes of mineral aggregate extraction uses that is separate from the definition contained in Table 1 of the Official Plan. This separate definition is provided in Section 2.14.13 of the OP as: *For the purposes of defining the Core Areas of the Greenlands System for mineral aggregate resource extraction uses within the Rural System of the Greenbelt Plan, define Core Area woodlands as all woodlands that are a minimum of 30 hectares in size, subject to policy 4.3.2.10 of the Greenbelt Plan.* **Appendix G, Table 3** evaluates Woodland Core Areas as defined by the Town of Caledon Official Plan. The Town's Official Plan defines Woodland Core Areas as a woodland that meets one or more criteria of a Core Woodland as defined in Table 1 of the Region's Official Plan. **Appendix G, Table 4** evaluates Natural Area and Corridor Woodlands as defined by the Region of Peel Official Plan. Under the Region's Official Plan, Natural Area and Corridor Woodlands as a woodland that meets one or more criteria of a NAC Woodland in Table 1 of the Region's Official Plan. Because Woodland C and G do not meet the criteria of a Core Woodland for the purposes of mineral aggregate extraction uses as evaluated in **Appendix G, Table 2**, they were carried forward to the evaluation Natural Area and Corridor Woodlands in **Appendix G, Table 4.** Woodland F (1.5 ha) was re-evaluated based on the Assessment of Natural Area and Corridors Woodlands under the Region of Peel Official Plan (**Appendix G, Table 4**). This was undertaken based on the results of a complementary assessment of bat habitat conducted on March 27, 28, and April 4, 2025. Results are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			Woodland F was observed to contain a few trees with a DBH greater than 50 cm and expected to be over 100 years old; however, combined, these trees would not meet the 0.5 ha requirement under the Age category in **Appendix G, Table 4**. Because Woodland F was already considered a Natural Area and Corridor Woodland, this update does not change the results of the impact assessment. The impact assessment for each woodland feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	A response to an Information Request was received from the MNR on June 22, 2021, in which the boundary limit for Caledon Meltwater Deposit—Forks of the Credit ANSI was provided in an Earth Science Inventory Checklist report and map dated 2013. This boundary matches the ANSI limits on both NHIC and LIO mapping and is shown on Figure 1 of the NER. The ANSI is outside of the extraction limit and will not be directly impacted by the proposed extraction. The impact assessment for each ANSI feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	As assessment of SWH features is summarized in the attached Natural Feature Impact Summary Table. The table includes assessment of the following SOCC or SWH types: ▪ Easten-wood Pewee ▪ Barn Swallow ▪ Bat Maternity Colonies (subject to change)				
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	As requested by MECP, additional studies related to bat habitat were completed and are provided as an addendum in CBM Caledon Pit / Quarry – Species at Risk Bat Habitat Assessment, attached (WSP 2025). Bat habitat assessment and SAR are subject to an on-going iterative review process with MECP.				
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.	5.8 Greenbelt Plan Natural Heritage Features	The impact assessment for all natural features, including KNHFs and KHFs under the Greenbelt Plan, is summarized in the attached "Natural Feature Impact Summary Table". The table also outlines the location of each feature relative to the extraction limit, Site, and adjacent lands (i.e., Study Area), as well as relative to the Greenbelt Natural Heritage System.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	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.						
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. 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. Also note that policy 5.11.2.2.6 d) addresses Other Wetlands. This policy should be addressed.	5.8 Greenbelt Plan Natural Heritage Features	All unevaluated wetlands on the Site were assessed for significance under OWES in the document titled *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP July 17. 2024), and in the attached *CBM Caledon – Additional Wetland Assessment (Woodland B) technical memorandum*.(2025) The impact assessment for each wetland feature, including significant and non-significant wetlands, is summarized in the attached "Natural Feature Impact Summary Table".				
38.	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.	5.9 Region of Peel Natural Heritage Features	The Region's Official Plan Section 2.14.28 states that plantations are to be included as a Core Area Woodland if they are a naturalized plantation and meet one or more criteria for a Core Area Woodland as defined in Table 1 of the Region's Official Plan. A naturalized plantation is defined in the Region's Official Plan as having dense regeneration of native tree seedlings and/or approximately 100 or more stems per hectare of regenerated native trees that have attained a minimum height of 1.37 m. Although the CUP3-1 plantation contained mature trees, it did not contain a dense regeneration of native tree seedlings, nor did it have 100 or more stems per hectare of regenerated native trees reaching at least 1.37 m in height. The canopy was dominated by planted, mature red pine with associates of black ash and non-native Texas ash and tree-of-heaven. The understory was described as being dominated by dense red raspberry and non-native Tatarian honeysuckle. As such, the CUP3-1 was appropriately excluded from Woodland D and the Core Area Woodland. The impact assessment for each woodland feature is summarized in the attached "Natural Feature Impact Summary Table".				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
39.	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. 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. Significance assessments should be removed from habitat of threatened and endangered species. These features are confirmed and should be assessed for potential impacts.	5.9 Region of Peel Natural Heritage Features	While it is true that the PPS no longer contains *significant* habitat for END/THR species listed as a constraint, both the Region's OP and the Town's OP **Table 3.1** acknowledge significant habitat for END/THR species as a constraint. As such, the assessment in the NER considered the significance of habitat for endangered and threatened species in accordance with the definitions of the Region and Town OPs, as are currently applicable.				
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	Woodlands C, F, and G and SAR habitat for bobolink / eastern meadowlark and SAR bats are considered a NAC by the Region. The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	Wetland Units 1 and 2 are considered a PNAC. Woodland A is considered a NAC Woodland. Wetland Units 3 and 4 overlap Woodland B, which is considered a Core Area. The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	5.10.1 Environmental Policy Areas / 5.10.2 Natural Core Areas and Natural Corridors	Under Town Official Plan Section 5.11.2.2.5 (e), mineral aggregate extraction is prohibited in EPAs except for those EPAs set out in in the following sections: ▪ Section 3.2.5.9.1 (related to significant habitat of threatened or endangered species) ▪ Section 5.11.2.2.6 (related to Valley and Steam Corridors, locally significant wetlands, Woodland Core Areas, Other Woodlands, Other Wetlands, and SWH)				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	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, KHFs and their related VPZs. Please update the report to include each feature within the extraction limit, the site and the study area.		▪ Section 5.11.2.2.8 (related to Greenbelt KNHFs and KHFs) The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	With respect to the kettle wetlands of the Cataract Southwest PSW, and water related relationships and understanding of both surface and groundwater, we refer the reviewer to the Groundwater Mitigation System Design Report (WSP May, 2025). This report is instrumental in addressing inquiries related to impacts to these wetland features.				
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	The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				
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	The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table" and the bat technical memorandum prepared for the MECP as part of the MECP SAR iterative review process underway. The proponent relies on the review, guidance, and approval from the regulatory agency (MECP in this case) with specific expertise and authority as it replates to species at risk in Ontario as noted in Section 4.1 of the PPS, which states: Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements. Refer to response #6				
46.	As per earlier comments, all assessed features meet the definition of Natural Core Areas (with the possible exception of	5.10.3 Supportive Natural Systems	The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	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.	and Natural Linkages					
47.	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. 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).	6.0 Impact Analysis	The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table. Water related impacts are summarized in the table. However, the details requested are not included in the NER but rather are provided in the complementary Water Report (revised July 2023) and the Groundwater Mitigation System Design Report (May 2025) : http://www.cbmcaledonquarry.ca/assessments/index.html				
48.	The VPZ should be 30 m from fish habitat. Please revise.	6.2.1 Tributary #1/Pond	See Natural Feature Impact Summary Table See response #49 Based on the assessment of the berm placement and proposed VPZ, no negative impacts on fish or fish habitat are anticipated in either Tributary #1 or the 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	6.2.1 Tributary #1/Pond	The HGS model at SW14 (Tributary #1) predicts higher flow to occur at this station than has been observed in the field during the period of record. The HGS model also predicts SW14 to experience a flow reduction during operations of 16% and of 10% post-rehabilitation. Field observations indicated that SW14 is part of an ephemeral water feature that sits within a perched water table and showed periods of dry conditions over the available record. This predicted reduction in flow is not expected to reduce				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	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.		the wetted period or significantly alter the hydraulic function of this feature, and based on field observations and consideration of the HGS model predictions, there are low or no impacts predicted at SW14. Beyond the limited habitat and flow, the instantaneous and daily average maximum water temperature readings measured (October 2021 to October 2022) at SW14 (on Tributary #1) were 26.82°C and 21.88°C respectfully. These temperatures exceed the known thresholds for Brook Trout. Based on the field observations and HGS model outputs, along with the fact that Tributary #1 already experiences dry periods, there were no spawning habitats identified, and this reach of watercourse is somewhat isolated with broken connectivity both up and downstream. Therefore, no negative impacts on fish or fish habitat are anticipated in either Tributary #1 or the pond. This project will include the implementation of best management practices, mitigation measures and enhancements through the progressive rehabilitation process to ensure no negative impacts on Tributary #1 or the pond during the proposed extraction. This understanding of potential aquatic impacts and mitigation measures noted above are subject to review/consultation/approval with the responsible regulatory authority (DFO). Following a meeting with DFO regarding the water management strategy, they have confirmed that reissuing of the LOA is not anticipated (September 29, 2025).				
50.	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. 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.	6.2.2 Credit River	The proposed pit and quarry are situated in the Upper Aquifer (including Gasport Formation and overburden aquifers). Underlying the Upper Aquifer is the well known and regionally significant Cabot Head Formation shale aquitard, which limits the potential for impacts of the proposed pit and quarry to the Upper Aquifer. The Credit River is situated at an elevation below the Upper Aquifer, below the escarpment, and beneath the Cabot Head Formation Aquitard. The bed of the Credit River overlies overburden sediments (at elevations below the Upper Aquifer), the Cabot Head Formation aquitard, the Whirlpool / Manitoulin Formation aquifers, and the Queenston Formation aquitard. The contours of modelled drawdown do not extend to Credit River in any of these formations, as per the 2025 Mitigation System Design Report and therefore no changes to baseflow are predicted to occur. Please also see response 49 and 51 for complementary information. The above information was shared with DFO during a presentation give on July 9, 2025. Following that meeting DFO have confirmed that reissuing of the LOA is not anticipated (September 29, 2025).				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
51.	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. 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.	6.2.2 Credit River	The maximum annual volume of water collected during operation of the proposed Caledon Pit / Quarry that will be discharged to the golf course for irrigation represents a very small fraction of the average flows in this reach of the Credit River (about 0.8%) and only a fraction portion of this water would not be required for irrigation and would eventually report to the Credit River through existing natural channels on the golf course. All water leaving the proposed pit / quarry site will be required to meet stringent water quality requirements in accordance with the MECP regulations and will not have an impact on receptors. Once the pit / quarry dewatering begins, the water transferred to the golf course will allow the golf course to reduce their need to draw water from the Credit River for irrigation, as it currently does under its Permit To Take Water (typically about 230 million litres / year), while the quarry is dewatering. Once pit / quarry operations have been completed and the site is rehabilitated to a natural state, the two water bodies that will form in the North and Main areas are predicted to have a slight surplus of water, and this excess water will continue to flow to the golf course. Water transferred to the golf course would then thermally be acclimated into the local water system at the golf course and any excess water that may eventually enter the Credit River from the golf course will not have water quality or thermal impacts on receptors in the river. This is less than 0.2% of the average flow in the Credit River at this location and the additional flow is not expected to impact the river in any way. The following information was shared with DFO during a presentation give on July 9, 2025. Following that meeting DFO have confirmed that reissuing of the LOA is not anticipated (September 29, 2025).				
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	Please refer to the Water Report (revised July 2023) and the Groundwater Mitigation System Design Report (May 2025) : http://www.cbmcaledonquarry.ca/assessments/index.html				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
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	Please refer to the Water Report (revised July 2023) and the Groundwater Mitigation System Design Report (May 2025) : http://www.cbmcaledonquarry.ca/assessments/index.html See the attached Natural Feature Impact Summary Table				
54.	The unevaluated wetland (Unit 1) should be evaluated using the current OWES to determine significance given the proposed removal of the feature. The removal of a key hydrologic feature, which includes other wetlands, is considered an impact. Please revise and address appropriate policies.	6.4 Other Wetlands	Please see response 13 All unevaluated wetlands on the Site were assessed for significance under OWES in the document titled *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024), and in the attached addendum *CBM Caledon – Additional Wetland Assessment (Woodland B)* technical memorandum The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table.				
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	Within the VPZ, restoration will include both woodland and grassland enhancements using plantings focused on locally native, non-invasive species that create habitat that promotes **natural succession processes**, which is a natural, self-sustaining vegetation process. Refer to Figure 6 in the NER for Rehabilitation Concept for more information. Please see response #68 regarding VPZ and policy compliance and 58 regarding ecological appropriateness of the established VPZ				
56.	Portions of the proposed extraction limit overlap with the catchment area of the Coulterville Wetland Complex, and the 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	6.4 Other Wetlands	See Natural Feature Impact Summary Table Water balance – Catchment SW16 will have a decrease in surplus under operational conditions and rehabilitated conditions. However, flow has not been observed during the monitoring period at SW16. The portion of SW16 catchment on the site does not report runoff downstream. Any contribution from groundwater at SW16 will be maintained through infiltration mitigation system.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	phase. Please explain how the reduction in catchment area for the duration of the extraction will not negatively impact the Coulterville Wetland Complex.		Also please refer to the Water Report (revised July 2023) and the Groundwater Mitigation System Design Report (May 2025) : http://www.cbmcaledonquarry.ca/assessments/index.html				
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	The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table. Please see response #68 regarding VPZ and policy compliance and 58 regarding ecological appropriateness of the established VPZ.				
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	**Ecological Justification for VPZ** As per the Greenbelt Plan, section 3.2.5.5b, natural self-sustaining vegetation means: *vegetation dominated by native plant species that can grow and persist without direct human management, protection or tending.* As per section 6.5 of the NER the 10 m VPZ was chosen based on the width of the critical root zone required by trees to grow in this area. The critical root zone, as defined by the International Society of Arboriculture, is equal to a 1 ft radius from the tree trunk for each inch of tree DBH (i.e., 0.3 m radius for each 2.5 cm) (PNWISA 2021). Similarly, the City of Ottawa recommends a 10 cm radius for each 1 cm DBH (Ottawa 2021). Along the woodland limit where trees measure between 30 cm and 50 cm DBH, the critical root zone would be from 3 m up to 6 m from the tree trunk. Based on this calculation, the 10 m VPZ is expected to be sufficient to protect the critical root zone of Woodlands B and D and provide room for woodland expansion through natural succession. Within the VPZ, restoration will include both woodland and grassland enhancements using native plantings focusing on locally native, non-invasive species that create habitat that promotes **natural succession processes**, which is a natural, self-sustaining vegetation process. Refer to Figure 6 in the NER for Rehabilitation Concept for more information. Please see response 68 with respect to VPZ and Greenbelt Policy Compliance. Based on the language provided in the Greenbelt Plan (2017) and PPS (2024), the VPZ and setbacks are compliant with these regulatory documents when read in their entirety.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
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	Please see responses 27 to 32 The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table.				
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	See the Natural Feature Impact Summary Table Initial water related conditions and assessment were documented in the following reports: 1. Water Report (revised July 2023) and the NER assessment drew from this report to describe potential impacts and mitigation. 2. Water Report Addendum, CBM Caledon Pit and Quarry. WSP Canada Inc. Technical Report dated March 2025, WSP, 2025 3. The Groundwater Mitigation System Design Report (May 2025) : http://www.cbmcaledonquarry.ca/assessments/index.html. Please reference these reports with respect to water related components such as catchment area, base flows, drawdown, etc. With the implementation of proposed mitigation, it is concluded that there are no negative impacts to nature heritage features.				
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	Refer to response # 34 The impact assessment for each natural feature is summarized in the attached "Natural Feature Impact Summary Table".				
62.	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	7.0 Rehabilitation / Mitigation / Monitoring	A revised monitoring plan is provided in the following document: WSP, 2025a. Water Report Addendum, CBM Caledon Pit and Quarry. WSP Canada Inc. Technical Report dated March 2025,				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	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. 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: - monitoring program and reporting; monitoring recommendations 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						

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	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	The rehabilitation plan was designed to support four goals. A more detailed description of each goal is provided below. The successful implementation of the rehabilitation plan will lead to achieving each of the goals. The timeline will depend on a number of factors including the timing and duration of extraction, largely based on the market need for material. 1. Increase biodiversity of the Site post-extraction ▪ Creation of shoreline areas with a diversity of habitats will support a wide variety of wildlife life cycle activities (e.g., amphibian breeding, bird perching, waterfowl nesting, fish habitat, turtle basking) that may not currently be supported on the Site. ▪ Aquatic and emergent marsh plants in the lake in the North Area will contribute to new habitat areas and increased plant diversity on the Site. ▪ Above-water side slopes will be seeded with a mixture of native grasses and legumes, contributing to an increase in meadow plant diversity on Site. ▪ Setback / VPZ plantings will generally be consistent with species present in the adjacent retained natural features but will also include a subset of new native species, contributing to an increase in woodland plant diversity on Site. Further, these areas will be planted as younger stock, creating different successional habitats that may support different types of wildlife than are currently present on the Site. 2. Improve and/or enhance habitat connectivity across the Site and to existing adjacent natural heritage systems. Create new habitat features to support the existing local wildlife community and/or attract additional wildlife and increase productivity. ▪ Riparian plantings along Tributary #1 to enhance existing habitat conditions and increase natural riparian cover. ▪ New turtle habitat will be created in the North Area, including aquatic, overwintering, basking and nesting components. No turtle habitat is proposed to be removed as part of the proposed extraction. ▪ Meadow and woodland planting in the Off-Site Ecological Enhancement Area will create a new linkage with the Cataract Southwest PSW that may be used as a travel corridor, provide additional upland habitat to support wildlife using the PSW, and also enhance erosion controls on the slope adjacent to the PSW. 3. Increase the amount of natural cover on the Site, including a net gain in area of woodland, wetland and grassland/ meadow habitats.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
			▪ The proposed extraction results in the removal of 18.9 ha of woodland area, and 46.2 ha of woodland area will be created. Therefore, woodland areas will be increased by a 2.4 to 1 ratio. ▪ The proposed extraction results in the removal of 0.1 ha of non-significant wetland area, and 1.6 ha of wetland area will be created. Therefore, wetland areas will be increased by a 16 to 1 ratio. ▪ The proposed extraction area results in the removal of 15.8 ha of grassland habitat, and 25.3 ha of grassland habitat and 7.6 ha of meadow habitat will be created. Therefore, grassland / meadow habitat will be increased by a 2 to 1 ratio. 4. Increase the abundance of native species on the Site and reduce potential for invasive species establishment. ▪ As above, there will be a net gain in area of woodland, wetland and grassland/ meadow habitats planted with native species. All plantings completed as part of rehabilitation will be audited for two years post-planting to assess planting survival rates, and additional plantings completed if required to meet habitat conditions outlined in the Site Plans. Further, prior to surrender of the licence at the end of operations, final rehabilitation must be confirmed as following the Site Plans by the aggregate inspector.				
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	The phasing of the proposed mineral aggregate operation has been designed to reach final extraction limits and depths within each phase so progressive rehabilitation of the side slopes can be completed. The post-extraction rehabilitation plan has been designed to be progressive, to fit into the overall regional context and to complement the existing topography and terrestrial and aquatic features in the area. Approximately 5.75% of the Site is subject to the Town's approved Rehabilitation Master Plan (RMP). The portion of the Site that is subject to the RMP is located in the northwest portion of the Site, adjacent to Mississauga Road, and the RMP envisions this area as natural heritage and adjacent agriculture. The Final Rehabilitated Landform and Ecological Enhancement Areas Plan for the proposal plans for natural heritage and agriculture in this location and is consistent with the Town's approved RMP. Further, an upland forest and meadow grassland will be created on the southern 36 ha, south of the proposed licence area, and CBM is exploring the potential of conveying them permanently to a public authority for long term protection. As well, the Aggregate Resources Act Site Plans include a maximum disturbed area for the site and an explanation of how the area is calculated. Throughout the life of the operation CBM must not exceed this maximum allowable disturbed area.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			A more detailed discussion on rehabilitation and conformity with the Caledon OP is provided in the Planning Justification and Aggregate Resources Act Summary Report (GSAI 2023).				
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	In accordance with the Greenbelt Plan, the extracted area will be progressively rehabilitated. The post-extraction rehabilitation plan has been designed to fit into the overall regional context and complement the existing topography and terrestrial and aquatic features in the area. Because the extraction is below-water, it is not feasible to rehabilitate the lands back to agricultural conditions. Rather, the overall final rehabilitation plan will consist of three separate lakes in each of the North, Main and South extraction areas surrounded by nearshore, riparian, and upland habitats. Proposed rehabilitation of the extraction area will proceed progressively through each phase. As well, the Aggregate Resources Act Site Plans include a maximum disturbed area for the site and an explanation of how the area is calculated. Throughout the life of the operation CBM must not exceed this maximum allowable disturbed area. It is noted that approximately 22 ha of the Site is located within the Greenbelt NHS. Of this, the Final Rehabilitated Landform and Ecological Enhancement Areas Plan shows woodlot on approximately 10 ha of that area. This equates to approximately 45% of the land subject to Natural Heritage System rehabilitation policies within the Site being rehabilitated to forest cover, achieving the policy directive to rehabilitate no less than 35% of non-aquatic portion of the land to forest cover. Overall, the progressive and final rehabilitation plan for the Subject Site includes the creation of 157.9 ha of lakes, 7.8 ha of gradual grades and islands, 1.6 ha of wetlands, 46.2 ha of woodlands, 25.3 ha of grasslands, 7.6 ha of meadow, and 14.8 ha to remain in existing conditions. The proposed rehabilitation has been designed to use all of the on-Site topsoil and overburden and does not require the importation of additional soils. As well, off-Site compensation (outside the licence area) includes 20.3 ha of meadows and 15.5 ha of woodland, both proposed south of the licence area. Through rehabilitation, all areas to be removed will be more than compensated for. The proposed final rehabilitation plan is compatible with the surrounding lands through the creation of natural lake features, forest and meadow areas, environmental linkages, and adding a variety of landform features that will complement and benefit the existing community. A more detailed discussion on rehabilitation and conformity with the Greenbelt Plan is provided in the Planning Justification and Aggregate Resources Act Summary Report (GSAI 2023).				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
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	The 2022 Migratory Birds Regulation (MBR) under the MBCA modernization changes the nest protections from year-round to when nests have conservation value (i.e., when active). There is a list of 18 species with year-round protection with specific conditions to be met before disturbing a nest, which are listed as Schedule 1 of the MBR. Barn Swallow is listed as special concern under the ESA and are not part of Schedule 1 species under the MBR, therefore, inactive nests are not protected under MBCA. Only active Barn Swallow nests and eggs are protected under MBCA. Barn Swallow nests and eggs are also protected as a Special Concern and Rare Wildlife Species under SWH during active life stages. Nests and structures that support nesting (e.g., barns) may be removed outside the Barn Swallow active season of April 1 to August 31.				
67.	The VPZ should be 30 m from fish habitat. Please revise.	7.2.4 Fish Habitat	See response #48 and #49				
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	Extraction will be set back a minimum of 30 m from the Coulterville Wetland Complex and the WSP evaluated wetland that covers wetland units 3 and 4). Note all wetlands in the vicinity of the Site have been evaluated by WSP for their potential as PSWs. All unevaluated wetlands on the Site were assessed for significance under OWES in the document titled *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024) and in the CBM Caledon – Additional Wetland Assessment (Woodland B) technical memorandum attached (WSP 2025) Please also see response 13 **Greenbelt Policy Conformance** With respect to Greenbelt Plan policies and appropriateness of the proposed 10 m VPZ relative to 30 m VPZ, the following clarification and understanding of the Plan is offered. The Greenbelt states in policy 3.2.5.3 *"Beyond the Natural Heritage System within the Protected Countryside, key natural heritage features are not subject to the policies of section 3.2.5, but are to be defined pursuant to, and subject to the policies of, the PPS."* The development/site alteration envelope of the proposed Caledon Pit / Quarry is outside of the NHS, Key Natural Heritage Features (KNHF) and Key Hydrologic Features (KHF), but adjacent (within 120 m) to these features within the Protected Countryside. *Section 3.2.5.5 Key Natural Heritage Features and Key Hydrologic Features Policies of the Greenbelt Plan* states*: (brackets added):* *A proposal for new development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System or a key hydrologic feature anywhere within the Protected Countryside requires a*				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			natural heritage evaluation or a hydrological evaluation which identifies a vegetation protection zone which: *a) Is of sufficient width (no specific width is assigned) to protect the key natural heritage feature or key hydrologic feature and its functions from the impacts of the proposed change and associated activities that may occur before, during and after construction and, where possible, restore or enhance the feature and/or its function; and* *b) Is established to achieve and be maintained as natural self-sustaining vegetation.* In addition, with respect to Section 4 of the Greenbelt Plan and Mineral Aggregate resources Section 4.3.2 Non-Renewable Resource Policies of the Greenbelt Plan states: *For lands within the Protected Countryside, the following policies shall apply:* *1. Non-renewable resources are those non-agriculture-based natural resources that have a finite supply, including mineral aggregate resources. Aggregates, in particular, provide significant building materials for our communities and infrastructure, and the availability of aggregates close to market is important for both economic and environmental reasons.* *2. Activities related to the use of non-renewable resources are permitted in the Protected Countryside, subject to all other applicable legislation, regulations and official plan policies and by-laws. The availability of mineral aggregate resources for long-term use shall be determined in accordance with the PPS,* Exception notes found in this Section are associated and applicable to areas within the Natural Heritage System which the proposed Caledon Pit / Quarry is not in, but rather within 120 of the NHS, and as such is subject to the provision of the PPS as noted above. The above noted policy review and clarification demonstrates compliance with the Greenbelt Plan. Response # 58 demonstrates the ecological appropriateness of the proposed 10 m VPZ in protecting the woodland and maintaining the KNHF and its function (Please reference comment #58 for Ecological Justification of VPZ).				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
			Based on the language provided in the Greenbelt Plan (2017) and PPS (2024), the VPZ and extraction setbacks are compliant with these regulatory documents when read in their entirety.				
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	Extraction will be set back a minimum of 30 m from the Coulterville Wetland Complex, re-evaluated as a PSW (WSP 2025), and all other wetlands meeting the size criteria in OWES. All unevaluated wetlands on the Site were assessed for significance under OWES in the document titled *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024), and in the *CBM Caledon – Additional Wetland Assessment (Woodland B)* (2025) technical memorandum. All wetlands adjacent to the Site have now been evaluated with respect to their potential to be PSWs. Please see response 13 Wetland unit 5 did not meet the definition of a significant wetland under OWES and is not located within the Greenbelt NHS. However, wetland 5 overlaps pond #1 which is conservatively considered as fish habitat. Extraction is set back a minimum of 30 m from wetland unit 5. Please see response 67. **Ecological Justification for VPZ** According to Beacon's Ecological Buffer Guideline Review (Beacon 2012), 10 m is recommended as the base buffer width for protection of wetland features and functions (e.g., water quality, core habitat and screening of human disturbance). The majority of the 10 m VPZ will be reforested as part of the rehabilitation plan. The similarity in structure between the wetland and the reforestation area will create a soft edge at the interface, which will be an ecological improvement over the hard edge that currently exists just beyond the wetland edge and the adjacent agricultural crop fields (MNR 2011b). The soft edge transition zone will also help mitigate potential for invasive species migration into the wetland. Cadenasso and Pickett (2001) demonstrated that a thinned/sparsely vegetated or "open" edge allowed for higher volume of seed dispersal as well as further distance of dispersal into the forest interior compared to an intact or "vegetated" edge. In addition, erosion and sediment control measures will be implemented for Woodland B, which overlaps Coulterville Wetland Complex. The proposed 30 m extraction setback will also increase the effective size of the VPZ because it includes existing non-wetland portions of Woodland B, which will provide increased protection for water quality, disturbance (i.e., noise and dust) screening, and edge effects.				
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	7.2.7 Woodlands	The VPZ no touch zone is 10 m and the extraction setback is 15 m, of which the 10 m closest to the pit/quarry may be used for berms planted to achieve a naturalized native planting scheme, which is an enhancement from current agricultural lands. Please see response 58 and 68 with respect to VPZ width.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
	Greenbelt NHS. Please revise to reflect a 30 m VPZ, which includes no disturbance.						
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	Noted. The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table. Please see response 58 and 68 with respect to VPZ width.				
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	The impact assessment for each natural feature is summarized in the attached Natural Feature Impact Summary Table.				
73.	Per Fish Habitat, Blasting Impacts and Dewatering Impacts Memo (N/S) (Mar 19, 2025) Through consultation, CVC has indicated to the Town that since 1997, they have recorded a substantial amount of Brook Trout and redd data in the Credit River in proximity to the proposed pit / quarry (see figure below). Data from more recent surveys, including those from 2024, are not shown on the figure but were recorded from Charleston Sideroad upstream to the end of CVC's property (yellow area shown in figure), adding to the existing amount of confirmed and		The Blast Impact Assessment report (Golder 2022, revised July 2023) indicated that the closest blast extraction from the Credit River was 400 m. Using the methodology outlined by the DFO in Wright & Hopky (1998), the water overpressure at the Credit River is estimated to be 3.80 kPa. This is well below the 50 kPa limit that the DFO currently uses. As requested, two additional fish habitat receptors upstream and downstream of Charleston Sideroad were included: ▪ Location 1 – Northwest of Charleston Sideroad 578460.51 E, 4854692.81 N 474 m from extraction limit 2.90 kPa & 2.13 mm/s ▪ Location 2 – Southeast of Charleston Sideroad 578605.54 E, 4854252.13 N 395 m from extraction limit				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	sensitive data in this area; the largest spawning aggregation in the area is located upstream and close to Charleston Sideroad. Redd locations are recorded within 400 m of the proposed extraction limit, as well as beside the golf course where pit / quarry dewatering discharge is proposed. a. Blasting impact assessment: Thank you for assessing the potential impacts on fisheries (Blast Impact Assessment December 2022, Revised July 2023; prepared by Golder Member of WSP). The assessment applies the Wright and Hopky (1998) threshold of 100 kPa. DFO considers both the source / reference and maximum threshold out of date. DFO now applies a 50 kPa maximum threshold and refers to the Monitoring Explosive-Based Winter Seismic Exploration in Waterbodies, NWT 2000-2002 by Cott and Hanna (2005). The blasting impact assessment notes that the minimum separation of the proposed extraction limit and the Credit River is approximately 400 m. However, the two Credit River fish habitat receptors assessed in the report are located at further distances. Please include two additional fish habitat receptors upstream and downstream of Charleston Sideroad (each is approximately 400 m from the proposed extraction limit) and apply the current DFO threshold (50 kPa) to the assessment.		kPa & 2.86 mm/s The ground vibrations and water overpressure estimated for these two additional locations are well below the DFO limits.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
74.	b. Quarry / pit dewatering assessment: comment 51 in the CAART Comment Table states: "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. 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." Further to this and given the confirmed Brook Trout and redd locations adjacent to and downstream from the golf course, pit / quarry dewatering and discharge details continue to be necessary to inform the impact assessment on the Credit River and the sensitive fish and fish habitat conditions. Therefore, additional details and impact assessments (e.g., impact on groundwater contributions, impact on groundwater upwellings in the Credit River, etc.) of the proposed pit / quarry dewatering activities on Brook Trout species and their spawning habitat (redds) in the adjacent Credit River are necessary. Also, additional details and impact assessments of the proposed pit / quarry dewatering discharge		Please refer to the Water Report (revised July 2023) and the Groundwater Mitigation System Design Report (May 2025): http://www.cbmcaledonquarry.ca/assessments/index.html Summary related to fisheries: ▪ Increase in catchment of Main Branch of Credit River of 1.358 km2 and decrease in catchment of the Erin Branch of the Credit River of 1.358 km2, with no net change in overall catchment to the Credit River. ▪ Refer to Comment Response 50 for discussion of the river-aquifer interaction Pit / quarry dewatering will be discharged off-site to the irrigation pond system at the Osprey Valley Golf Course via a pipeline. Water will be used for irrigation at the golf course when needed, with excess water stored and later discharged through the existing pond system to the Credit River. There will be no direct discharge of water from the pit / quarry to the Credit River. ▪ During operational period, there is a slight increase in water surplus. Once pit / quarry operations have been completed and the site is rehabilitated to a natural state, slight decrease in water surplus, and this excess water will continue to flow to the golf course. ○ The changes in surplus will be small and no impacts to fish or fish habitat in the Credit River are anticipated. ○ The maximum annual volume of water collected during operation of the proposed Caledon Pit / Quarry that will be discharged to the golf course for irrigation represents a very small fraction of the average flows in this reach of the Credit River (about 0.8%) and only a fraction portion of this water would not be required for irrigation and would eventually report to the Credit River through existing natural channels on the golf course. ▪ This is less than 0.2% of the average flow in the Credit River at this location and the additional flow is not expected to impact the river in any way. ○ Water transferred to the golf course will allow the golf course to reduce and eventually eliminate their need to draw water from the Credit River for irrigation, as it currently does under its Permit To Take Water (typically about 230 million litres / year). ○ Water transferred to the golf course would thermally be acclimated into the local water system at the golf course and any excess water that may eventually enter the Credit River from the golf course will not have water quality or thermal impacts on receptors in the river.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	locations, pipe location and installation, golf course irrigation pond(s) and inlets, infrastructure, discharge locations and details, and any other relevant information, on Brook Trout species and their spawning habitat in the adjacent Credit River are necessary. The Study Area should be expanded to include the extent of these project details and locations (e.g., pipe, Osprey Valley Golf Course – scoped to the irrigation infrastructure).		○ All water leaving the proposed pit / quarry site will be required to meet stringent water quality requirements in accordance with the MECP regulations and will not have an impact on receptors. ▪ There will be no direct discharge of water from the pit / quarry to the Credit River. Therefore, no significant changes expected to flow or thermal characteristics of the Credit River as a result of discharge to the golf course. No impacts on fish or fish habitat anticipated.				
75.	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). a) 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. b) 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	Wetland Assessment Memo	Please see response 13 Please see CBM Caledon memorandum – Additional Wetland Assessment (Woodland B) technical memorandum. Per Table 1 and Appendix A of the memo, the SWC1-1 and SWT2-2 communities were included in the assessment of Units 3 and 4. For clarification, an updated wetland figure is provided in the memorandum showing ELC wetland communities within the wetland units assessed. The kmz files is saved here: https://wsponline.sharepoint.com/:f:/r/sites/GLD-114392/Project%20Files/5%20Technical%20Work/Ph%202500-Natural%20Env/2_Field%20Work/Wetland%20Delination%20-%20April%204%202024%20CBM%20Caledon?csf=1&web=1&e=0SDWro				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	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.						
76.	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.	Wetland Assessment Memo	Please see response 13 No bat acoustic survey data is available for Wetland Units 1 and 5 (not treed communities) or Units 3 and 4 (low habitat potential). FOD8-1 was not surveyed during acoustics because the entire woodland community was known to be outside of the extraction limit and it was conservatively assumed to be SAR bat habitat based on general habitat characteristics. BBS point count data is provided as an attachment to this response.				
77.	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	Wetland Assessment Memo	The *Unevaluated Wetland Assessment for the Proposed CBM Caledon Quarry, Caledon, Ontario* (WSP 2024) served as a high-level assessment to determine if the mapped unevaluated wetland units on site had characteristics that would necessitate a comprehensive evaluation according to OWES 2024 as a potentially significant wetland. Based on this assessment, these wetland units would not be evaluated as a wetland under OWES. Also, please see attached CBM Caledon – Additional Wetland Assessment (Woodland B) technical memorandum (2025).				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**						
	(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.						
78.	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.	Wetland Assessment Memo	Please see response 13 Fish data details are provided in response #7.				

	Initial CAART Comments (Feb 2025)	Page / Section	Applicant Response (Date) Sept 30	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**							
79.	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	Wetland Assessment Memo	Please see response 75				

TOWN OF CALEDON

CAART Response – 2025-Sept-30