



# CBM-Caledon Quarry

## CAART COMMENT SUMMARY TABLE RESPONSE #2 – [AIA]

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

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

	Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
1.	<p><b>Description of the Onsite Agricultural Lands:</b></p> <p>There is an apparent contradiction in the AIA that the author should clarify, regarding the Canada Land Inventory (CLI) – Soil Capability for Agriculture classification associated with the PSA. A key finding of the AIA relates to the characterization of the quality of soils within the PAA. Throughout much of the AIA, the Subject Site has been described as being comprised mainly of CLI Class 4 soils, which are non-prime agricultural lands.</p> <p>“It is also worth noting that the majority of the Subject Site do not consist of prime agricultural lands. They are predominantly CLI Class 4 lands.” (Page 10).</p> <p>On page 33 of the AIA provides calculated Hoffman Productivity</p>	Page 21, Table 1, Figure 2, Pages 23-24. Page 33, Table 4.	<p><b>Response to Contradiction Comment:</b> The source of the CLI Capability Classes is the provincial soil resources database. The Primary Study Area (PSA) is the Subject Site. The boundaries of the PSA were overlaid onto the CLI mapping and the areas of each of the soil types and the CLI Capability Classes were calculated. The CLI Capability Classes mapped in the PSA include 45.57% Class 2, 51.95% Class 4, and 2.48% Class 5 (See Table 2, pg. 24). As this table shows, the majority of the PSA consists of non-prime agricultural lands (54.43%). Further, the majority of the PSA is comprised of CLI Class 4 lands which is consistent with what is stated in the AIA. The AIA does not say that the majority of the lands within the prime agricultural area is comprised of CLI Class 4 lands.</p> <p>There is no contradiction in the AIA.</p>	Clarification provided by the applicant regarding the distinction between CLI and HPI is acknowledged. The revised explanation represents a significant departure from the original AIA.	No response required.	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
<p>Index (“HPI”) values for the Subject Site (also referred to as the Primary Study Area) and a larger surrounding area, referred to as the HPMARA. The Hoffman Productivity Indices (HPI) are used to assign a single value for each soil polygon. The value relates to the agricultural productivity of the soil map unit. The HPI value is determined by the relative percent of each soil capability class present in the soil map unit and provides an equivalent CLI capability class. Text from page 33 of the AIA is provided below.</p> <p>“As shown in Table 4, the HPI for the larger HPMARA is higher than that of the PSA. The HPMARA lands have an HPI of 0.73 which is equivalent in productivity to CLI Class 2 lands. The PSA has an HPI of 0.64 which is the equivalent in productivity to CLI Class 3 lands. CLI Class 3 lands have the lowest priority for preservation among the prime agricultural lands.”</p> <p>Based on the HPI results set out in the AIA, the amount of land that is considered to be Prime Agricultural Land in a Prime Agricultural Area needs to be clarified, as there are planning policy implications. In addition, the amount of Prime Agricultural Land in the PAA should also be provided based on the proposed extraction limits (i.e., 200 ha). This information is important as the extraction limits are directly related to lands that will be removed from agriculture.</p>		<p><b>Response to HPI Comment:</b> Please note that the HPI is not used to identify prime agricultural areas. We used it as tool to compare the equivalent productivity of the PSA to other lands within the HPMARA as part of the assessment of alternative locations.</p> <p>Also, the HPI was used as part of the evaluation of alternative locations. The PPS 2024 no longer requires new applications for aggregate operations to address alternative locations. Any reference to alternative locations in the AIA should be disregarded.</p> <p>In our opinion, there are no policy implications.</p>			
<p>2. <b>Description of Agricultural Operations and Agricultural Land Uses:</b></p> <p>It is noted that the AIA did not include Farm Data Surveys or any documentation from onsite and</p>	<p>Page 24-26, Figure 3.</p>	<p>Data was collected through a land use survey on October 7, 2021, following an online review of aerial imagery and OMAFRA’s Agricultural Systems mapping. Land use notes were provided in Appendix F of the AIA.</p>	<p>It is understood that Farm Data Sheets can be used to calculate MDS requirements, but the information provided by the farmer can also verify the type and number of livestock, type of manure treatment systems and size and</p>	<p>OMAFRA’s Agricultural Impact Assessment Guidance Document (2026) shows that when preparing an AIA the personal details of any consultation with farm operators be redacted. This is consistent with how we and others have been</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
<p>adjacent farmers. Data obtained from the landowner/farmer would be useful in corroborating the characterizations attributed to each Agricultural operation.</p> <p>A more detailed description of Farm Operation #1 would also be helpful.</p> <p>As well, it would be useful to determine if any Nutrient Management Plans are associated with the PSA as these management plans could be impacted by aggregate extraction.</p>		<p>Farm Data Sheets are primarily used to calculate MDS setback requirements. Given that the MDS Formulae do not apply to aggregate operations, Farm Data Sheets were not provided to landowners within the Study Area.</p> <p>Nutrient Management Plans (NMPs) are not publicly available and attempts to obtain any possible NMPs from landowners in the Study Area is not a required component of an AIA, nor contemplated in OMAFRA's Draft AIA Guidance Document.</p>	<p>type of barns. SAI is requesting this type of information on Farm Operation No. 1.</p> <p>SAI requests that Colville advise whether any of the livestock farms within the PSA have a NMP.</p>	<p>collecting information from landowners for the past several years. Many farmers are already reluctant to provide specific details regarding their farm operation and often refuse to provide specific details for a number of reasons including privacy, bio-security, fear of data misrepresentation and for competitive reasons. As a practice, we no longer collect personal information such as names and contact information. Nor do we fill out Farm Data Sheets other than what we need to satisfy the AgriSuite MDS formulae. To maintain confidentiality, we will not provide the names of the information sources, however we have been able to collect some information regarding Farm #1.</p> <p>Previously we had identified Farm #1 as Lochlea Angus, a beef operation. The farm infrastructure lies outside of the secondary study area although a portion of the lands does extend into the secondary study area.</p> <p>On January 21, 2026 we called the number on the Lochlea Angus Facebook page and discovered that the farm is now under new management, although it is understood that the owner of the property remains the same. The angus beef herd has been sold off and a new farmer uses the lands to summer pasture Charolais beef cattle.</p> <p>The former farmer was unable to provide me with contact information for the new farmer but was able to provide me with the information requested by SAI. The maximum number of cattle that the lands can support is 50. There are two barns. One containing 10 box stalls for horses that were once on the farm. The other barn with attached lean to run in shelter (approximately 30'x25') which can accommodate 30-40 animals. Both of these barns are located outside of the Secondary Study Area. The maximum capacity of the farm for livestock was</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
				<p>estimated to be 50 beef cattle. The manure storage system is most akin to a V3 storage system. Manure was scraped out of the barn with a frontend loader and piled outside uncovered until spread on the fields with a manure spreader.</p> <p>Although we have provided the information requested, it has no bearing on the conclusions reached in the AIA. Should the municipality want to confirm this information, we can provide you with contact information upon request.</p> <p>With regard to the inquiry about nutrient management plans (NMP), we have contacted the farmers using the Subject Lands (PSA) and have confirmed that they do not have an NMP that relies on lands within the PSA.</p>	
<p>3. <b>Fragmentation of Agricultural Lands:</b></p> <p>A discussion/comparison of Property Size/Fragmentation for the PSA/SSA nor does the report compare the farm sizes set out in the Census of Agriculture statistics for 2011, 2016 or 2021.</p> <p>Discussion concerning the ownership and tenancy of Agricultural parcels within the PSA and SSA – are the farmlands within the PSA and SSA locally owned and operated?</p> <p>Discussion concerning the future ownership of the lands associated with the application - will the lands associated with the development will remain in one consolidated land parcel (lot lines merge) or will the existing lot lines be maintained? Will the future ownership and use of the subject property (and adjacent lands owned or leased by the applicant) conform to the uses</p>	<p>Page 30, Figure 5.</p>	<p><b>Response to Census Data Comment:</b> Section 5.3 of the AIA discusses the number of farms in the 2011, 2016, and 2021 Census of Agriculture and also discusses the amount of cropland in the respective years.</p> <p>In our opinion, providing a comparative analysis of the level of fragmentation within the PSA/SSA would provide no benefit and would not impact the conclusions of the AIA.</p> <p><b>Response to Ownership Comment:</b> All of the lands within the PSA are owned or controlled by CBM. The ownership details of other lands within the SSA are unknown and are not necessary. However, knowing the ownership details of the lands within the PSA and SSA are not required when completing an AIA.</p> <p>The AIA was completed to address the requirements of the AIA Guidance Document. The AIA Guidance Document does not include a requirement to assess Ownership and Land Tenure. In fact, neither “ownership” or “tenure” appear in the</p>	<p>An updated map identifying lands owned and controlled by CBM and clarification of future parcel fabric is requested.</p> <p>Will the lands associated with the development will remain in one consolidated land parcel (lot lines merge) or will the existing lot lines be maintained?</p> <p>Will the future ownership and use of the subject property (and adjacent lands owned or leased by the applicant) conform to the uses associated with the PAA or will the development of a large recreational lake area result in pressure to develop the lands for more intensive non-agricultural land uses in the future?</p>	<p>We do not have a map that identifies the lands owned and controlled by CBM nor do we have the future parcel fabric for these lands. This is not an Item that was identified for submission in the Terms of Reference prepared for the AIA and is outside the scope of this assessment.</p> <p>We have responded to this request previously (see <b>Response to Ownership Comment, May 12, 2025</b>). We feel that this information is irrelevant to this AIA given the proposed after use. It is not something that is required to be addressed in an AIA (2026) and it was not an item identified in the Terms of Reference prepared for the AIA and accepted by the municipality</p> <p>The proposed rehabilitation plan is specifically an ecological enhancement plan to create a lake and other natural heritage features. There is no direct proposal for recreation to be an after-use on this site. There are no non-agricultural, non-ecological land uses being proposed or contemplated in this area. Any proposal for non-agricultural, non-ecological land use on the site following</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
associated with the PAA or will the development of a large recreational lake area result in pressure to develop the lands for more intensive non-agricultural land uses in the future?		<p>document. The ToR we prepared for the AIA, and approved by the Town of Caledon, also did not include an assessment of land ownership/tenure.</p> <p><b>Response to Future Ownership/Use Comment:</b> To date there have not been discussions regarding the future (post-extraction) consolidation of parcels (if any) with the landowners or municipal staff. However, it is understood that following licence surrender and final rehabilitation, the lands may be redesignated to a more appropriate land use designation related to conservation, natural heritage and/or agricultural uses. Any proposed future development would be required to be consistent with applicable policies of the day. The overall goal of the final rehabilitation plan is to create a landform that represents an ecological and visual enhancement and provides future opportunities for conservation, recreational, tourism and water management. Any of these uses would significantly limit the establishment of “more intensive non-agricultural land uses”. For these reasons, it is not anticipated that intensive non-agricultural development will occur as a result of the proposed aggregate operation.</p>	<p>Future potential impacts related to MDS 2 setbacks should be evaluated by the agricultural consultant. Mechanisms to mitigate potential impacts, including the use of agricultural easements, should be evaluated to ensure no future impacts on the agricultural system result from the proposed development.</p>	<p>full rehabilitation and surrender of the licence would be subject to Official Plan policies at the time.</p> <p>There are no future plans to establish sensitive land uses on site through rehabilitation that would restrict a neighbouring livestock operation from expanding its barn capacity. The proposed after use is related to ecological enhancement and the establishment of natural heritage features. There is no need to evaluate MDS 2 setbacks or to develop mitigation measures to avoid or minimize impacts on surrounding agricultural uses. However, in the future, should a non-agricultural or non-ecological development be proposed for the PSA, the development would need to be consistent with the land use policies of the day.</p>	
<p>4. <b>Economic and Community Benefits of Agriculture</b></p> <p>The AIA did not provide an opinion with respect to the contribution of the Agricultural activities associated with the subject lands to the economy of the Region and Town.</p>	Page 32.	<p>A tenant farmer cultivates common field crops within the Subject Site and it is expected that the farmer will continue to farm these lands. The agricultural activity within the Subject Site will continue to contribute to Regional and Town’s agricultural economy for several more years and will only cease within the extraction area when the lands are eventually needed for extraction of the aggregate resources. According to Census of Agriculture data, there were 80,409 acres of lands in crops in the Region of Peel, of which 73,460 acres are within the Town of Caledon. As</p>	<p>Based on the information provided in the AIA and 2nd Submission, it is difficult to understand how connectivity of the agricultural system will be maintained. Please explain.</p>	<p>The presence of natural heritage features within the agricultural system is common in prime agricultural areas. These features do not negatively impact prime agricultural areas other than the need for farmers to manage the lands adjacent to these features which may fragment their land base. With regard to this application, the rehabilitation plan for the ecological after use will not have an operational impact on adjacent farms.</p> <p>Section 4.3.2 Non-Renewable Resource Policies, Subsection 4. of the Greenbelt Plan states “In prime agricultural areas,</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
		<p>stated in the AIA, approximately 258 ha (637.5 acres) of the Subject Site are cultivatable. Therefore, the Subject Site represents approximately 0.79% and 0.87% of the lands in crops in the Region of Peel and the Town of Caledon, respectively. The Phasing of the proposed aggregate extraction will allow for continued cultivation within the Subject Site until the lands are to be extracted, with lands outside of the extraction area being available for cultivation over the lifespan of the operation. Given the small percentage that the Subject Site contributes to crop production in the Region and Town, impacts to the agricultural economies are expected to be negligible.</p>		<p>applications for new mineral aggregate operations shall be supported by an agricultural impact assessment and, where possible, shall seek to maintain or improve connectivity of the Agricultural System.”</p> <p>For this application, the proposed after use will result in the creation of key natural heritage features and key hydraulic features. The policy referenced above states that “where possible” the new mineral aggregate operation shall seek to maintain or improve the connectivity of the agricultural system. Generally, agricultural connectivity on surrounding lands is maintained; however, direct connectivity involving the subject lands would only be achievable if the after use were to include the rehabilitation to an agricultural after use, which is not what is being proposed, nor what is required here.</p>	
<p>5. <b>Alternative Site Assessment</b> Appendix I provides mapping for the Alternate Site Assessment. The mapping illustrates Active Aggregate Sites within an area much larger than the SSA. There are mapping inaccuracies in the aggregate site mapping. The base layer for the mapping is Physiographic mapping from the Ministry of Northern Development and Mines. The Niagara Escarpment Area and settlement areas are not shown on the base layer and the source of natural heritage features mapping is not clear.</p>	<p>Page 33, Section 5.11 &amp; Appendix I.</p>	<p>Prior to PPS 2024, there was a need for AIAs to assess alternative locations. However, policies in the PPS 2024 no longer includes the need for aggregate operations to assess alternative locations making a response to this CAART comment somewhat moot.</p> <p>The AIA generally followed the methods identified in The Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas, Publication 851. The CAART comment notes that the alternate site assessment includes an area “much larger” than the SSA. This is true and consistent with OMAFA’s guidelines which states that the geographic area within which to identify alternative sites varies can vary depending on the proposed use. It does not restrict the alternative site assessment to just the SSA. The guidelines suggest assessing alternative sites within the entire market</p>	<p>Acknowledged that PPS 2024 no longer requires alternative site evaluation. If the author chooses to retain Appendix I mapping should be corrected. Or removed Appendix I completely to avoid misinterpretation.</p>	<p>There is agreement that an alternative site evaluation is no longer required in an AIA (PPS 2024). Appendix I should be disregarded. The response previously provided (May 12, 2025) and acknowledged in the CAART response (December 11, 2025) confirms this.</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
		<p>area/service. We scoped the alternative sites using the HPMARA information which identifies aggregate resources within the Region. For this study, it would not be feasible to assess alternative locations where there are no aggregate resources.</p> <p>The CAART comment states that there are mapping inaccuracies in the aggregate site mapping. Although the need to consider alternative sites is no longer a requirement, we can update the mapping if CAART provides us with the appropriate mapping.</p> <p>CAART correctly notes that the base layer for the mapping in Appendix I is from the Ministry of Northern Development and Mines. It provides physiographic information such as landforms where aggregate resources are often found.</p> <p>For the purposes of this exercise, it was not necessary to include the boundaries of the Niagara Escarpment Area or natural heritage features. Those natural heritage features shown on the mapping are related to surficial drainage features which are part of the physiographic information included with the data sourced from the Ministry of Northern Development and Mines.</p>			
<p>6. <b>Assessment of Impacts to Agriculture</b></p> <p>Section 6.1.1 assesses the impact of extraction on the onsite Prime Agricultural land. The AIA notes that 119.02 (45.57%) of Prime Agricultural land (CLI Class 2 lands) will be removed.</p> <p>This statement appears to be inconsistent with the HPI value report in Table 4 (page 33).</p> <p>No statement was provided on the area of Prime Agricultural Land in a</p>	<p>Section 6, Page 34</p>	<p><b>Response to PAA &amp; HPI Comment:</b></p> <p>This comment appears to be a repeat of CAART’s first comment which has been addressed above. As previously stated the HPI of the PSA and the amount of prime agricultural land within the PSA are not the same. Once the reader understands the difference between the HPI and the CLI, it should be clear that there is no inconsistency in the AIA.</p> <p>On page 34 of the AIA, under section 6.1.1 it is stated that the proposed operation will “remove approximately 119.02 ha (45.57%) of prime agricultural</p>	<p>It would be helpful to provide a map and a table that describes the following for the PSA and the Area (i.e. North, South and West Areas):</p> <ul style="list-style-type: none"> <li>• The Area (in hectares) and % Coverage of the Licence and Area to be Extracted per CLI Class.</li> </ul> <p>This updated Table should replace Table 2 as described in Section 5.5.2 (page 24) of the AIA. This will help to clarify the statements made by Colville.</p>	<p>The Table attached to this response provides area (in ha) and percent coverage per CLI Class in the proposed Extraction Area, for each of the Main, North and South proposed Extraction Areas. This Table replaces Table 2 in the AIA. The map attached with the tables is the same map as provided in the AIA (Figure 3).</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
<p>Prime Agricultural Area that will be removed.</p> <p>A map in the AIA that illustrates what lands are owned vs controlled would be helpful.</p> <p>Impacts related to hydrogeology, transportation, noise/dust/vibration are assessed by other technical specialists. The AIA does not provide a statement regarding the ability of the site to handle onsite parking ability for haul trucks or the potential for offsite queuing of trucks on municipal roads. There is one operation that is located just beyond the SSA, No. 1, that should specifically be evaluated by the hydrogeologist to ensure that water resources are protected and a program for monitoring is provided. The AIA should summarize these measures.</p>		<p>land (CLI Class 2 lands) from the agricultural land base.” The agricultural land base includes both the lands within the prime agricultural area and the rural designated lands. The PPS 2020 describes the agricultural land base as <i>“An agricultural land base comprised of prime agricultural areas, including specialty crop areas, and rural lands that together create a continuous productive land base for agriculture”</i>. The PPS 2024 provides a similar description – <i>“An agricultural land base comprised of prime agricultural areas, including specialty crop areas. It may also include rural lands that help to create a continuous productive land base for agriculture”</i>.</p> <p>The amount of prime agricultural land expected to be permanently removed from within the extraction area is provided in more detail in the response to SAI’s comments in Section 8 - Review of Agricultural Policies below.</p> <p><b>Response to Owned vs Controlled Comment:</b> A map showing what lands are owned by CBM and what lands are controlled by CBM is not necessary to determine the potential impacts of the proposed development on agriculture. Colville is not aware of any map that has been prepared showing this information.</p> <p><b>Response to Transportation Comment:</b> Through discussions with T.Y.Lin, it is understood that the site plan incorporates an internal access road leading to the gatehouse, specifically designed to accommodate the projected 95th-percentile truck queue during peak morning hours. This configuration ensures that trucks will not be required to park illegally on Charleston Sideroad or other nearby roads while waiting to access the site.</p>			

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
		<p>Furthermore, the CBM Truck Haulage Program mandates that all Carriers adhere to established haulage procedures when entering, operating within, and exiting CBM premises. All Carriers are also required to comply with the Ontario Highway Traffic Act. Accordingly, Carriers are prohibited from stopping or parking on any municipal or regional roadways adjacent to the operation at any time, unless expressly permitted by municipal signage, particularly while awaiting entry to the site. Additionally, Carriers are not permitted to block access to any driveways or entrances of adjacent properties under any circumstances.</p> <p><b>Response to Hydrogeology-Related Comment:</b> Farm Operation No. 1 is a beef operation – Lochlea Angus. It is located outside of the secondary study area. We have reviewed aerial photography of the area and did not identify any surface water features that could be utilized by the beef herd. It is assumed that the operation relies on groundwater as its source of water.</p> <p>WSP is assessing the potential impacts on the groundwater levels due to aggregate extraction for lands surrounding the Subject Site. Please refer to WSP hydrogeology report. However, we can confirm that WSP has determined that the Lochlea farm is well outside the zone of influence (ZOI) of the pit / quarry and it will not be impacted.</p>			
<p>7. <b>Agricultural Technical Recommendations</b></p> <p>Site Plan does not include provisions for soil stripping, soil storage and soil re-application procedures.</p> <p>SAI notes that the Site Plan includes a site plan over-ride</p>	<p>Section 9.1, Page 42.</p>	<p><b>Response to Site Plan Comment:</b> Please refer to the Operational Plan (2 of 4) for specific wording for these provisions. If these lands were to be rehabilitated for an agricultural after use, the notes would have provided much more detail based on the agricultural rehabilitation procedures outlined in the Agricultural Impact</p>	<p>While the applicant indicates agricultural rehabilitation is not feasible, the Site Plans show areas (e.g., Phase 2A) proposed for tableland woodland requiring extensive backfilling. Soil management procedures (stripping, storage, reapplication) and a soil budget must be included given that restoration of vegetated tablelands still necessitates</p>	<p>PPS 2024 Policy 4.5.4 notes the following for proposed extraction in Prime Agricultural Areas. Subsection 2 states: <i>'2. Despite policy 4.5.4.1.b), complete rehabilitation to an agricultural condition is not required if:</i></p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
<p>related to fencing: Site Plan Over-ride No. 3; <i>Rationale #1: This will enable agricultural production to continue with minimal disruption and accounts for the long life expectancy of the operation. The AIA should discuss this provision and describe why this is needed. Please explain this.</i></p> <p>The AIA does not reference a maximum disturbed area for the proposed pit/quarry however, the Site Plan includes a provision to limit disturbance to 95 ha. The AIA should address this requirement.</p>		<p>Assessment Guidance Document. Addressing the provisions identified by CAART are necessary and important when rehabilitating a site back to an agricultural after use. However, the lands within the extraction area will not be returned to an agricultural after use capable of producing arable crops. Therefore, there is no need to provide the specific provisions identify by CAART.</p> <p><b>Response to Site Plan Override Comment:</b> The site plan over-ride referenced is to allow fencing to be installed in a phased approach. If fencing is not phased, farm equipment would be unable to access fields for the duration of the operation. Allowing for fencing to be installed in a phased approach will allow for continued cultivation with minimal access restrictions until the lands are to be extracted, thus reducing the short-term impacts to agriculture.</p> <p><b>Response to Maximum Disturbed Area Comment:</b> The entire extraction is 199,5 ha in size and will eventually be disturbed as a result of extraction. The note in the Site Plans it is believed that CAART is referring to is as follows:</p> <p>On the Operational Plan there is a provision <b>M. Maximum Disturbed Area</b>, it states:</p> <p>1. The maximum disturbed area is 95.0 hectares. Disturbed areas shall include active extraction areas, stockpile areas, internal haul routes, areas being progressively rehabilitated and berms until they are vegetated. Areas that have been side-sloped and vegetated, and the adjacent un-vegetated or flooded vacated quarry floor (eg. stockpiles and equipment removed), shall not constitute disturbed areas.</p> <p>This note states that the maximum area of disturbance will not exceed 95 ha at</p>	<p>proper soil handling.</p> <p>Opportunities to maximize agricultural rehabilitation should be evaluated based on the soils budget.</p>	<p><i>a) the depth of planned extraction makes restoration of pre-extraction agricultural capability unfeasible; and</i></p> <p><i>b) agricultural rehabilitation in remaining areas is maximized.'</i></p> <p>Opportunities to implement agricultural rehabilitation were initially considered; however, because the depth of extraction makes restoration of pre-extraction agricultural uses unfeasible, the proposed rehabilitation is planned to consist of ecological features including natural hydrologic features in the form of lakes. Exploring agricultural rehabilitation in remaining areas was explored; however, the resultant steep slopes around the periphery of the extraction areas resulting from the depth of extraction makes agricultural rehabilitation on remaining areas unfeasible.</p> <p>Recommendations for Agricultural Rehabilitation are provided in Appendix D of the Agricultural Impact Assessment Guidance Document (2026). The area that the CAART response refers to (Area 2A) is for the proposed rehabilitation of the woodland in the northern portion of the Main Area as shown in the Site Plans (Rehabilitation Plans Drawing 4 of 4). This area of the site is adjacent to a Significant Woodland (Woodland B) and Greenbelt Natural Heritage System and, accordingly, rehabilitation to natural heritage features is appropriate in this location.</p> <p>Since agricultural rehabilitation is not required or feasible for this application, a soil budget was neither prepared nor is it necessary. For further confirmation see below.</p> <p>“A soil budget is a tool to confirm there is enough soil stored on site (typically stored in perimeter berms) <b>to rehabilitate the lands to an agricultural condition</b>”. – Source:</p>	

Initial CAART Comments (09/26/2024)	Page / Section	Applicant Response (May 12, 2025)	CAART Response (December 11, 2025)	Applicant Response (FEB 26, 2026)	CAART Response (date)
		any one time. Lands that have been progressively rehabilitated will not be considered to be “disturbed”.	Clarification is also required regarding the red-line removal of “for as long as possible” from the agricultural continuation note.	<p>Agricultural Impact Assessment Guidance Document (2026). Bold text added for emphasis.</p> <p>The proposed after use through rehabilitation is for ecological enhancement and the establishment of natural heritage features. There will not be any opportunities for agricultural rehabilitation on lands within the extraction limits.</p> <p>CAART is referring to Note O.1.a on Drawing 3 of 4. The revision was made in response to a comment from MNR in its letter dated November 20, 2023, which required that all site plan notes be concise and free from ambiguity. Accordingly, in August 2024, Note O.1.a was revised to remove the phrase “for as long as possible” from the end of the sentence. The revision does not alter the intent to continue farming the lands for as long as possible.</p>	

<p>8. <b>Review of Agricultural Policies</b> <u>SAI Comment on PPS Assessment:</u></p> <p>The AIA should describe and discuss the area of the site that is in the PAA and the relevant CLI – Soil Capability For Agriculture classification of these lands within the PAA. A further breakdown of the area of the site, within the PAA, that will be extracted should be provided.</p> <p>There has been limited documentation provided in the AIA that discusses the feasibility of agricultural rehabilitation.</p>	Section 2, Pages 9-15.	<p><b>Response to Par. 1:</b> We have calculated the areas as designated in Land Use Schedule A, in the Town of Caledon’s Consolidated Official Plan and Schedule D-1 of the Region of Peel Official Plan. See Attachments A and B. Please note, the Subject Lands are designated General Agricultural Area in the Town of Caledon Official Plan. We have considered the General Agricultural Area lands to be part of the Prime Agricultural Area in the calculation of areas, as General Agricultural Area policies are not separate from Prime Agricultural Areas in the Town of Caledon Official Plan.</p> <p><b>Land Use Schedule A</b> Extraction Area = 199.5 ha</p>	<p>Clarification is still required.</p> <p>– A more robust assessment of PPS 2024 policy 4.5.4.2 is needed, including documentation to support statements regarding the feasibility of rehabilitating portions of the site back to agriculture.</p> <p>- It is recommended that a soil budget be completed and options for restoring portions of the site to a tableland condition be evaluated.</p>	<p>PPS 2024 policy 4.5.4.2 has sufficiently been addressed. The proposed rehabilitation for these lands is for an ecological enhancement area consisting of natural heritage features. As demonstrated in the Site Plans, the extraction depths will range from 8 metres to 27 metres below the water table making the potential for agricultural rehabilitation unfeasible, pursuant to PPS Sec. 4.5.4.2.</p> <p>As mentioned above, a soil budget is only required for applications that are proposing agricultural rehabilitation. This application is not proposing agricultural</p>	
---	---------------------------	---	--	--	--

<p>The AIA should clearly state what portions of the site are considered to meet the requirement of “<i>In prime agricultural areas, on prime agricultural land.</i>”</p> <p>If the Subject Site is deemed to be Prime Agricultural land within a Prime Agricultural area, then the provides set out in 2.5.4.1 a), c) and d) should be examined in detail. Conversely, if the Subject Site is deemed to be non-prime agricultural land, then it would seem that the Alternative Site Location study is not required. Clarification of this matter is required.</p> <p><u>SAI Comment on Growth Plan</u></p> <p>As previously noted, the Province of Ontario issued a Provincial Planning Statement, 2024 under Section 3 of the Planning Act and it will come into effect October 20, 2024. The applicability of these provisions under the Growth Plan should be clarified.</p> <p><u>SAI Comment on ARA Assessment</u></p> <p>The AIA does not address the Matters that a Minister or Tribunal shall have regard to including 12(1) d), f), and g).</p> <p><u>SAI Comment on Greenbelt Plan</u></p> <p>Policies 3.1-3.6 inclusive set out the planning framework for the Agricultural System in the Protective Countryside. A summary of each policy within 3.1 should be provided, except policy 3.1.2 as there are no Specialty Crop Areas onsite on the site or in the SSA.</p> <p>The remaining agricultural-related policies within 4.3.2 should also be addressed including 4.3.2.6 and 4.3.2.7.</p>	<p>PAA in the Extraction Area = 55.97 ha PAL in PAA inside the Extraction Area = 41.86 ha Non-Prime Agricultural Lands within the PAA in Extraction Area = 14.11 ha</p> <p><b>Land Use Schedule D-1</b></p> <p>Extraction Area = 199.5 ha Prime Agricultural Area in the Extraction Area = 183.19 ha Prime Agricultural Lands in the Extraction Area = 101.74 ha Non-Prime Agricultural Lands within the PAA in Extraction Area = 81.45 ha</p> <p><b>Response to Par. 2:</b> The potential for agricultural rehabilitation of the quarry is mentioned several times throughout the AIA. Due to the extent of the extraction below the groundwater table, agricultural rehabilitation within the extraction area is not feasible. The AIA does not include a detailed discussion and recommendations for agricultural rehabilitation to restore the lands to an agricultural condition because the extraction depths below the water table make restoration to an agricultural after use unfeasible.</p> <p>A draft terms of reference (ToR) for the AIA was prepared and submitted to the Town of Caledon. The final ToR (August 18, 2022) is provided in Appendix A of the AIA. It discusses rehabilitation and clearly states that due to below water table extraction, a rehabilitation plan to restore the agricultural capability of the lands would not be feasible and that we would not be preparing an agricultural rehabilitation plan.</p> <p><b>Response to Par. 3:</b> It is unclear what is specifically being asked in this paragraph. Hopefully a review Section 2.1 of the AIA will address this comment. The response provided in Para. 1 in this section should also inform the reviewer.</p>	<p>– Additional analysis is required for ARA s.12(1)(d), (f) and (g), particularly regarding the suitability of rehabilitation and agricultural impact mitigation.</p> <p>– The explanation of Greenbelt Plan agricultural system connectivity is insufficient to demonstrate how connectivity is maintained post-extraction.</p> <p>– Consideration of agricultural easements (OP 5.1.1.22) should be</p>	<p>rehabilitation, therefore, a soil budget is not required.</p> <p><b>12 (1) of the ARA states “<i>In considering whether a licence should be issued or refused, the Minister or the Tribunal, as the case may be, shall have regard to (d) “the suitability of the progressive rehabilitation and final rehabilitation plans for the site”</i>”</b></p> <p>Response: The proposed aggregate extraction is consistent with this subsection. Rehabilitation can take several forms including rehabilitation for ecological purposes. Subsection (d) does not specifically refer to agricultural rehabilitation. The depth of planned extraction makes restoration of pre-extraction agricultural capability unfeasible.</p> <p>Subsection (f) states that the Minister or the Tribunal, as the case may be, shall have regard to: “<i>any possible effects of the operation of the pit or quarry on agricultural resources</i>”.</p> <p>Response: This subsection was fully addressed. The AIA was prepared to address any possible effects of the operation of the pit/quarry.</p> <p>Subsection (g) states that the Minister or the Tribunal, as the case may be, “<i>shall have regard to any planning and land use considerations</i>”.</p> <p>Response: Planning and land use considerations have been dealt with in the supporting planning documents filed in support of this licence.</p> <p>This CAART comment was dealt with above. Please refer to the response provided to CAART Comment - Issue 4, at the bottom of page 5.</p> <p>OP 5.1.1.22 has been addressed in full in the May 12, 2025 response. This policy directs “<i>The Town of Caledon (to) , in</i></p>	
---	--	--	--	--

<p><u>SAI Comment on Region of Peel Official Plan</u></p> <p>Schedules D-1 Prime Agricultural Area and Rural Land and Schedule D-2 – High Potential Mineral Aggregate Resources Areas should be included in the AIA. The AIA should provide a statement, based on the findings of the AIA, as to the conformity of the proposed mineral aggregate operation to the agricultural-related policies of the Region of Peel Official Plan.</p> <p><u>SAI Comment on Town of Caledon Official Plan</u></p> <p>The AIA should include mapping of the relevant schedules from the Caledon Official Plan.</p> <p>The statement, “A significant portion of the Subject Site consists of non-prime agricultural lands.” This statement should be operationally defined within the context of the relevant planning policy framework. As previously noted, the HPI results reported in the AIA indicate a Productivity Index Range of CLI Class 3. Further, the statement should be focused on the PAA portion of the subject property and the proportion of Prime Agricultural Lands within the area proposed to be extracted (and not rehabilitated to an agricultural end use) should be documented.</p> <p>The concluding paragraph should review each portion of Policy 5.11.2.2.9 a)-d) inclusive to assess conformity with the relevant policy framework in the Caledon Official Plan.</p> <p><i>5.1.1.22 Conservation Easements for Agricultural Land</i> – The AIA should address the potential for</p>	<p>Other than the side slopes along the perimeter of the Extraction Area a lake will eventually form.</p> <p><b>Response to Par. 4:</b> It appears that there is a word or words missing from the SAI comment. If need be, SAI should clarify this comment. However, I assume that this comment relates to the Alternative Site Locations section of the AIA. Please note that under the new PPS 2024, the evaluation of alternative locations is no longer required.</p> <p>Prior to the PPS 2024, an evaluation of alternative locations in an AIA was required. This opinion was confirmed through consultation with OMAFA land use planning staff.</p> <p><b>Response to SAI Comment on Growth Plan:</b> The Growth Plan was repealed upon 2024 PPS coming into force on October 20, 2024. Therefore, there is no need to comment further on the Growth Plan policies.</p> <p><b>Response to SAI Comment on ARA Assessment:</b> The AIA was completed in accordance with the draft Agricultural Impact Assessment Guidance Document and the Term of Reference prepared for the study and approved by the Town of Caledon.</p> <p>With regard to 12(1)(d), the AIA has had regard to the suitability of progressive rehabilitation and final rehabilitation plans. The AIA has acknowledged that the final rehabilitation plans will result in the formation of a lake and that restoration of the lands back to an agricultural condition similar to existing conditions will not be feasible due to the depth of aggregate extraction.</p> <p>The AIA has addressed potential impacts and has developed mitigation measures to minimize impacts where impacts cannot be avoided. This addresses 12(1)(f) of the Act.</p> <p>With respect to 12(1)(g) the planning and land use considerations are dealt with in the Planning Justification Report</p>	<p>addressed or formally deferred with rationale.</p>	<p><i>conjunction with the Province, Region of Peel, universities and non-governmental organizations encourage opportunities for the research into the use of conservation easements or other methods to promote agricultural land and to develop partnerships with appropriate granting organizations with the potential to compensate landowners”</i> This not an item that the proponent of a development application can address. Further, this item was not identified as something that needed to be addressed in the agreed terms of reference for the AIA.</p>	
--	--	---	--	--

<p>implementation of Conservation Easements for Agricultural Lands.</p>		<p>and ARA Summary Statement. Please refer to the planning documents prepared for this application for further information.</p> <p><b>Response to SAI Comment on Greenbelt Plan, Par. 1:</b> A summary of Greenbelt Policies 3.1.1 – 3.1.6 is contained within the Planning Justification Report and ARA Summary Statement (July 2023) and are also discussed below:</p> <p>Policy 3.1.1 – The Subject Site is located within the Town of Caledon’s Agricultural Land Base and consists of both prime agricultural areas and rural lands.</p> <p>Policy 3.1.2 – The Subject Site is not located within a Specialty Crop Area.</p> <p>Policy 3.1.3 – Approximately 183.19 ha of the Subject Site are within the prime agricultural areas of the Protected Countryside. Therefore, the following policies apply:</p> <ol style="list-style-type: none"> <li>1. All types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected and a full range of agricultural uses, agriculture-related uses and on-farm diversified uses are permitted based on provincial Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with and shall not hinder surrounding agricultural operations.</li> <li>2. Lands shall not be redesignated in official plans for non-agricultural uses except for: <ol style="list-style-type: none"> <li>a) Refinements to the prime agricultural area and rural lands designations, subject to the policies of section 5.3; or</li> </ol> </li> </ol>			
---	--	--	--	--	--

		<p>b) Settlement area boundary expansions, subject to the policies of section 3.4.</p> <p>3. Non-agricultural uses may be permitted subject to the policies of sections 4.2 to 4.6. These uses are generally discouraged in prime agricultural areas and may only be permitted after the completion of an agricultural impact assessment.</p> <p>4. New land uses, including the creation of lots (as permitted by the policies of this Plan), and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.</p> <p>5. Where agricultural uses and non-agricultural uses interface, land use compatibility shall be achieved by avoiding or, where avoidance is not possible, minimizing and mitigating adverse impacts on the Agricultural System, based on provincial guidance. Where mitigation is required, measures should be incorporated as part of the non-agricultural uses, as appropriate, within the area being developed.</p> <p>6. The geographic continuity of the agricultural land base and the functional and economic connections to the agri-food network shall be maintained and enhanced.</p> <p>Policies 3.1.3.3, 3.1.3.5 and 3.1.3.6 are the most relevant to the proposed aggregate extraction application. The AIA demonstrates that proposed aggregate extraction operation will be consistent with each of these policies.</p> <p><b>Response to SAI Comment on Greenbelt Plan, Par. 2:</b> Greenbelt Plan KNHFs and KHF are discussed in the Natural Environment Report (July 2023) and Section 4.3.2.6 and 4.3.2.7 of the</p>			
--	--	--	--	--	--

		<p>Greenbelt Plan are addressed in the Planning Justification Report and ARA Summary Statement (July 2023).</p> <p><b>Response to SAI Comment on Region of Peel Official Plan:</b> The AIA will not be revised. However, copies of Schedules D-1 and D-2 are provided in Attachment B and are also contained within the Planning Justification Report and ARA Summary Statement (July 2023).</p> <p>The proposed aggregate extraction application conforms with the Region of Peel Official Plan's agricultural policies. A detailed review of Regional policies is contained in the Planning Justification Report and ARA Summary Statement (July 2023).</p> <p><b>Response to SAI Comment on Town of Caledon Official Plan, Par. 1:</b> See Attachment A for the Land Use Schedules from the Caledon Official Plan. In addition, Schedules A (Land Use Plan), J (Long Range Road Network), and Schedule L (CHPMARA) are included and discussed in the Planning Justification Report and ARA Summary Statement (July 2023).</p> <p><b>Response to SAI Comment on Town of Caledon Official Plan, Par. 2:</b> This comment is substantially addressed in response to SAI's Comment on PPS Assessment above.</p> <p>Table 2 of the AIA (top of pg.24) shows the CLI capability classes, their areal representation (area and percentage) for the Subject Site.</p> <p>We have provided similar information for the lands within the Extraction Area.</p> <p><b>Response to SAI Comment on Town of Caledon Official Plan, Par. 3:</b> Updated policy information and review is provided in an Attachment C. As well, this policy section (5.11.2.2.9 (a-d inclusive) is discussed in the Planning Justification Report and ARA Summary Statement (July 2023).</p>			
--	--	--	--	--	--

		<p><b>Response to SAI Comment on Town of Caledon Official Plan, Par. 4:</b>  5.1.1.22 Conservation Easements for Agricultural Land states: <i>The Town of Caledon will, in conjunction with the Province, Region of Peel, universities and non-government organizations encourage opportunities for the research into the use of conservation easements or other methods to promote agricultural land and to identify and develop partnerships with appropriate granting organizations with the potential to compensate landowners.</i> – This policy is intended to be addressed by the Town of Caledon and not the proponents of the aggregate operation.</p>			
9.	<p>Results of Peer Review – General Comments</p> <p>A) Clarification of agricultural capability of the Primary Study Area is needed.</p> <p>B) The planning policy and ARA component of the AIA, i.e. Section 2 of the AIA, should be re-visited.</p> <p>C) The Alternate Site Assessment Figure is not a particularly useful map, and it is unclear if the consideration of Alternatives is even required from a policy perspective.</p> <p>D) Site Plan provisions (and relationship with the provisions of the Aggregate Resources Act) should be evaluated in the AIA.</p>	<p><b>Response to A:</b> This has been addressed in the above responses.</p> <p><b>Response to B:</b> The consistency with planning policy is addressed fully and comprehensively in the Planning Justification Report ARA Summary Statement (July 2023) and again in Attachment C for your ease of reference.</p> <p><b>Response to C:</b> As stated above, with the PPS 2024 now in effect, the need to address alternative sites is no longer required for aggregate resource extraction applications and is no longer required as a component in an AIA.</p> <p><b>Response to D:</b> Addressed above.</p>	<p>The applicant’s responses partially address the comments; however key deficiencies remain regarding policy conformity analysis, and rehabilitation feasibility. Alternative site assessment is no longer required under PPS 2024. However, other components of the AIA require supplementary reporting to ensure consistency with the PPS 2024 and conformity with the ARA.</p>	<p>The information provided in the AIA and in the subsequent responses to CAART’s comments fully address the requirements for an AIA and that the licence application is consistent with the PPS 2024 policies and conform to the agricultural related components in the ARA.</p> <p>Further, an Addendum PJR was prepared and submitted (by GSAI) in May 2025 which provides detailed policy review of PPS 2024, including Section 4.3.5 (Non-Agricultural Uses in Prime Agricultural Areas), and Sec 4.5 (Mineral Aggregate Resources).</p>	