

August 10, 2026

Genevieve Scott
Cuesta Planning Consultants
978 1st Avenue W.
Owen Sound, ON N4K 4K5

Dear Ms. Scott:

RE: Town of Caledon Peer Review of Agricultural Impact Assessment for CBM Caledon Pit/Quarry

Based on the letter of May 28 2026 from Stovel and Associates Inc., it is understood that all of the Town of Caledon's peer review comments related to the Agricultural Impact Assessment have been addressed with the exception of the following:

"SAI has reviewed the material submitted by the applicant and notes that:

- a) a soils budget was not provided; and*
- b) soil management measures that result in the separate stripping/stockpiling of topsoil, subsoil and overburden were not provided.*

It is the opinion of SAI that Colville has not provided sufficient information and analysis to assert that agricultural rehabilitation has been maximized in remaining areas. In this regard, SAI disagrees with Colville's interpretation of consistency with the Provincial Planning Statement, 2024 and conformity with the ARA."

We have reached out to MHBC Planning (MHBC) who prepared the site plans for the Caledon Quarry to obtain the information required to address SAI's outstanding comments. The following is a response to these outstanding comments:

SOIL BUDGET

The proposed CBM Caledon Pit/Quarry rehabilitation plan has been designed based on a detailed soil budget completed for the site. See attached figure. Each Area of the rehabilitation plan has been designed to utilize the available topsoil and overburden within that Area and CBM has committed to the community to not import excess soils as part of the rehabilitation of the site.

The Main Area includes 546,200 m³ of topsoil and 4,430,000 m³ of overburden for a total of 4,976,200 m³ soils available for the rehabilitation plan. These soils have been utilized to create 2:1 sideslopes around the majority of the Main Area, islands to add ecological diversity and along the northern boundary of the Main Area portions of the site have been restored to existing grade and are being rehabilitated to woodland. The northern boundary is being rehabilitated to a woodland condition since this portion of the site is located in the Greenbelt Natural Heritage System and the Greenbelt Plan promotes reforestation and enhance the ecological connection and corridors in this portion of the site.

The North Area includes 21,500 m³ of topsoil and 300,000 m³ of overburden for a total of 321,500 m³ soils available for the rehabilitation plan. These soils have been utilized to create 2:1 sideslopes around the majority of the North Area and forested sideslopes and wetland areas along the northern boundary to enhance ecological diversity of the site.

The South Area includes 190,300 m³ of topsoil and 670,000 m³ of overburden for a total of 860,300 m³ soils available for the rehabilitation plan. These soils have been utilized to create 2:1 sideslopes around the majority of the South Area and areas of gradual grade and islands to add diversity to the final configuration of the lake.

Please note that the rehabilitation plan as illustrated in the May 2026 Aggregate Resources Act (ARA) site plans includes a deficit of approximately 600,000 m³ of soils of which 480,000 m³ is located in the South Area. MHBC will be updating the ARA site plans to include minor adjustments to the sidesloping and a reduction of a few of the islands to ensure that the site is designed to achieve a soil balance budget and not result in the importation of excess soils.

As a result of the available soils on-site, the depth of extraction, CBM's commitment to not import excess soils and the requirements of the Greenbelt Plan for natural heritage restoration, there are no available soils to complete agricultural rehabilitation at the site.

SOIL MANAGEMENT MEASURES

SAI has noted that soil management measures that result in the separate stripping/stockpiling of topsoil, subsoil and overburden were not provided. Please note that these measures are included on the ARA site plans. The following are the notes from the ARA site plans dated May 2026, Drawing 2 of 5, "Site Preparation", Section E:

- 4. Topsoil and overburden shall be stripped and stored separately.*
- 5. Topsoil and overburden shall be placed in noise attenuation/visual berms or used immediately for progressive rehabilitation.*
- 6. Excess topsoil and overburden not required for immediate use in berms or progressive rehabilitation may be temporarily stockpiled within the limit of extraction in the location shown on the plan view of this drawing. Topsoil and overburden stockpiles in this location shall not exceed eight metres in height and may be located within 30 metres of the licence boundary (see Section N Variations from Control and Operation Standards).*
- 7. In situations where excess topsoil and overburden has to be temporarily stockpiled outside the area shown on the plan view of this drawing, stockpiles shall be located within the limit of extraction and remain a minimum of 30 metres from the licence boundary and 90 metres from a property with a residential use.*
- 8. Temporary topsoil and overburden stockpiles which remain for more than one year shall have their slopes vegetated to control erosion. Seeding shall not be required if these stockpiles have vegetated naturally in the first year.*
- 9. No topsoil shall be removed from the site (see Section N Variations from Control and Operation Standards).*

In addition, the following are notes are from the ARA site plans dated May 2026, Drawing 2 of 5, "Variations from Control and Operation Standards", Section N.

Section 0.13 Standard	Variation	Rationale
(1) 13.i.	Topsoil and overburden within the "Topsoil and Overburden Stockpile Area" may be stockpiled within 30 metres of the licence boundary.	The "Topsoil and Overburden Stockpile Area" is adjacent to additional land owned by the licensee .
(1) 17	Topsoil and/or overburden may be transferred between the Main, North and South Areas.	This will allow stripped material from site preparation to be used for berm construction, progressive rehabilitation and/or temporarily stockpiled in any Area.

AGRICULTURAL REHABILITATION MAXIMIZE IN REMAINING AREAS

SAI noted that Colville has not provided sufficient information and analysis to assert that agricultural rehabilitation has been maximized in remaining areas. The Ministry of Agriculture, Food and Agribusiness (OMAFRA) had a similar comment on the application and on November 17, 2023 OMAFA provided the following comment:

"While the AIA discusses many aspects of potential impacts of the application comprehensively it is unclear how the agricultural rehabilitation in remaining areas is maximized. Some additional information on how those parts of the proposed ARA licence that will not be rehabilitated to lakes might instead be rehabilitated to agriculture and possibly maintain or improve the connectivity of the Agricultural System would assist in the review of the application."

On May 6, 2024 Colville Consulting Inc. provided OMAFA with the following response:

"I believe that the areas that you are referring to are the lands that are being proposed for natural heritage features. The lands identified as 'Meadow' and 'Woodland' in the Rehabilitation Plan are now being used for common field crop production. The soils are mapped predominantly as CLI Class 4 and sub dominantly CLI Class 2. There are no agricultural infrastructure or land improvements located on the lands outside of the proposed extraction area or in close proximity to these proposed natural areas. The agricultural system is already fragmented in this area and connectivity is poor.

The proposed meadow lands north of Charleston Sideroad are now in common field crop production. They already have very limited connectivity to other agricultural areas. To the east of the proposed meadow lands are natural areas, a north-south orientated railway line and Osprey Valley Golf Course. The golf course is quite extensive and extends northwards along Main Street all the way to the hamlet of Alton. To the south are lands that are predominantly reforested (coniferous plantation). To the west are existing non-agricultural land uses (residential dwellings) forested areas which separate the proposed meadow lands from the agricultural areas (future lake) to the west. Given the existing land use conditions and limitations, opportunities to improve the connectivity of these lands to other agricultural lands following aggregate extraction will be severely limited.

To the south of Charleston Sideroad and north of Cataract Road, meadow lands and woodlands are also proposed. Although the lands are currently being used for common field crop production, the proposed woodlands are located within the hamlet of Cataract and are not part of the agricultural land base. The eastern and southern boundary of these lands immediately abut the existing community. The proposed meadow lands to the west are located within the agricultural land base.

However, they are confined by existing residential development and natural features to the south and west, and the hamlet of Cataract to the east. Again, opportunities to improve the connectivity of these lands to the agricultural system following aggregate extraction will be severely limited.

As I am sure you are familiar, there has always been a bit of a back and forth between natural heritage and agricultural uses. Historically, woodlands have been cleared for agricultural purposes and lower capability lands have often been returned to a natural condition through reforestation efforts or simply by abandoning the lands and allowing them to naturalize over time. In this case, there is some logic to establishing natural areas on these low priority, and fragmented agricultural lands and improving the connectivity of these lands for ecological purposes."

As a result, on March 7, 2025 OMAFA advised they were removing any outstanding objections with the Caledon Pit/Quarry ARA application. Therefore, OMAFA is satisfied that the application is consistent with Policy 4.5.4 "Extraction in Prime Agricultural Areas" from the Provincial Planning Statement 2024.

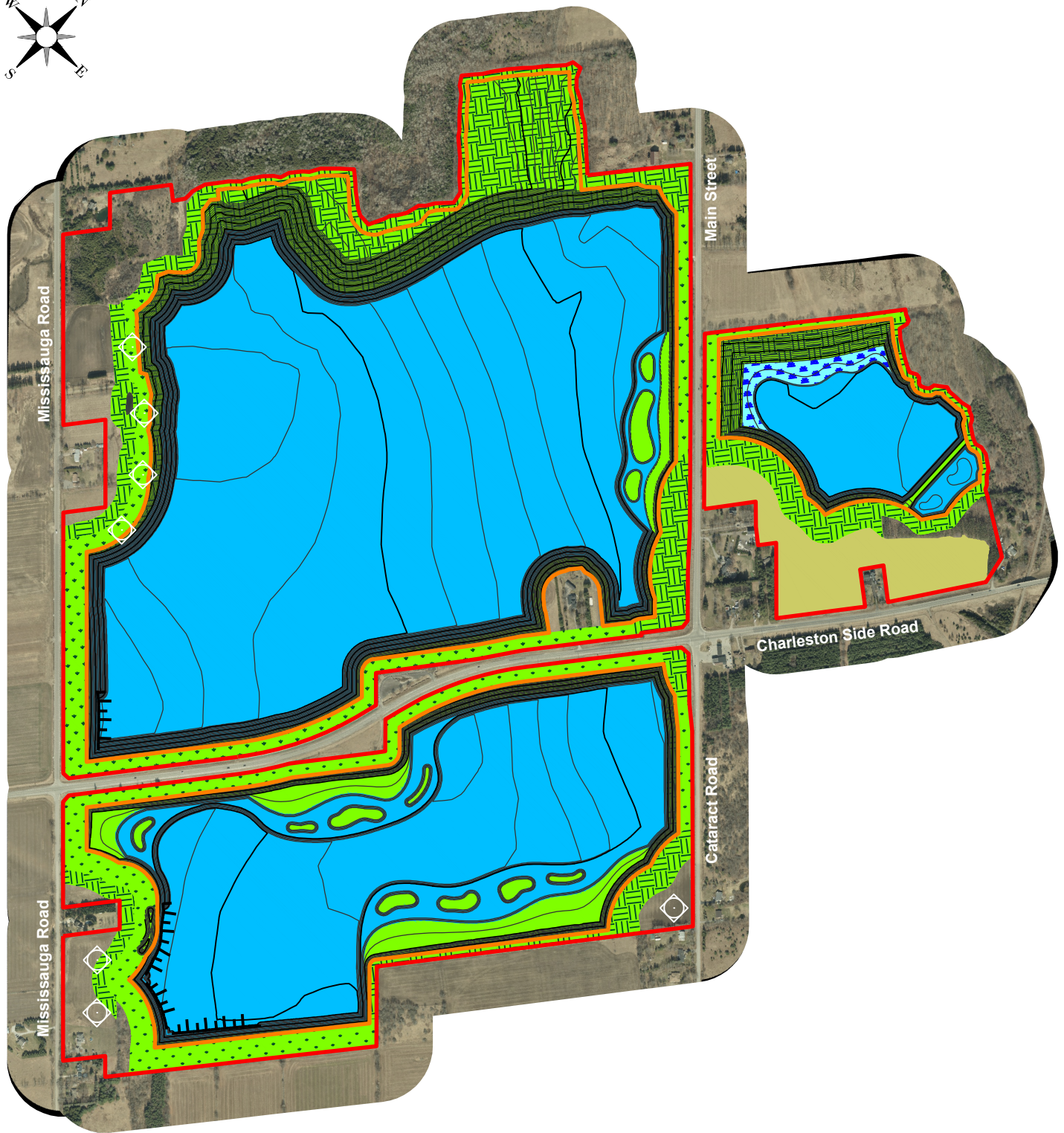
In conclusion, based on the available soils on-site, the depth of extraction, CBM's commitment to not import excess soils and the requirements of the Greenbelt Plan for natural heritage restoration, there are no available soils to complete additional agricultural rehabilitation at the site. Therefore, it is both Colville Consulting Inc. and OMAFA's position that the application is consistent with Policy 4.5.4 of the Provincial Planning Statement 2024.

Respectfully submitted by,



Sean Colville, B.Sc., P.Ag.
President, Colville Consulting Inc.

cc. Andreanne Simard, CBM
Jennifer Deleemans, CBM



This rehabilitation image is the May 2026 Rehabilitation Plan

CBM Pit and Quarry Proposed Rehabilitation Plan

Part of Lots 15-18, Concession 4 WSCR
Part of Lot 16, Concession 3 WSCR
Geographic Township of Caledon
Township of Caledon
Region of Peel

Legend

- | | |
|-------------------------|---------------------------------------|
| Licence Boundary | Wetland |
| Limit of Extraction | Lake |
| Gradual Grade or Island | Meadow |
| Grassland | Extraction Face (below water) - 592 m |
| Woodland | Rock Piles and Bat Boxes (white) |

Date July 2026

Sources
2021 aerial photography from First Base Solutions

Scale - 1:12,000
0 200 400 Metres

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