



Via email

Mr. Craig Laing
C.D. Aggregate Management Services

January 17, 2018

Mr. Laing:

Re: Agricultural Impact Assessment Peer Review Response
Part Lot 30, Concession 4 (EHS)
Part Lot 31, Concession 4 (EHS)
Part Lot 32, Concession 4 (EHS)
Township of Mono
County of Dufferin

Further to our telephone conversations and email correspondence regarding the Stovel and Associates Inc. "Review of Agricultural Impact Assessment – Violet Hill Pit – Town of Mono (December 14, 2017)", I provide the following point form response.

The Stovel and Associates Inc. peer review was based on a Draft Copy of the DBH Soil Services Inc. Agricultural Impact Assessment. The Draft Copy was not complete and did not contain the associated Appendices.

The Stovel and Associates Inc. peer review is a letter format document comprising 8 pages, separated into 7 (seven) sections. The first 5 sections identify and summarize the contents of the DBH Soil Services Inc. Agricultural Impact Assessment Report, while sections 6 (six) and 7 (seven) provide comment on the Assessment and Summary.

Section 6 (six) – Peer review Assessment indicates that the DBH report "represents a comprehensive examination of the agricultural character of the subject lands and adjacent lands". The peer review also indicates that the "study methodology is consistent with the standard approaches for AIA's in Ontario". Further, that the AIA follows criteria "as set out by OMAFRA". It should be noted that at the time of the DBH Soil Services AIA completion, the Province of Ontario (Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA)) did not have specific guidelines for the completion of Agricultural Impact Assessments (AIA's). Therefore, the AIA was completed using a modified version of the Halton Region Agricultural Impact Assessment Guidelines.

Report Status:

- The DBH report that was peer reviewed was a Draft Copy of the AIA.
- A final copy of the report was completed with a date of March 30, 2015.
- Typically reports from DBH Soil Services Inc. are not signed, but approved within the document transmittal.
- A CV (resume) can be provided if necessary.
- Copies of the soil field data are contained in an Appendix in the final version of the AIA.

Site Plans:

- The DBH report did not reference the Site Plans.
- The DBH report provided information for the Site Plans.
- The Final Site Plans were in production at the time of the writing of the AIA.
- The Stovel report indicates "that Note #2 is implying an interim agricultural phase". In my opinion, the wording of Note #2 suggests an erosion control measure (cover material) rather than a rehabilitation to agriculture phase. As such, the only potential changes to the



rehabilitation plan would be to preserve the topsoil used in the “lightly applied” areas for use in the final restoration process, if possible.

- The Stovel peer review indicates that the DBH report should provide comment for “increasing the overall potential capability of the site after extraction”. The DBH report provided indication that the area is not a Prime Agricultural area, and that the area was not identified as Prime Agricultural within the Town’s Land Evaluation and Area Review Study. The requirements under the Provincial Policy Statement (2014) indicate in Section 2.5.3.1:

“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.”

The DBH report clearly provides comment (Section 5) that the lands will be rehabilitated to an agricultural after use.

- Land Tenure and Ownership – The Stovel peer review disagrees with the DBH report comment regarding Land Tenure. The land tenure analysis was completed as based on assessment roll data provided from the Town. The Subject Lands are owned by Greenwood Aggregates Limited. According to the Town’s Assessment data, the Greenwood Aggregates Limited working address is located in Orangeville. Orangeville is a non-local address. Therefore, the DBH land tenure assessment is accurate. Further, the increase in smaller parcels in areas of agricultural production can provide for increased conflict between agricultural and non-agricultural lands uses, due to increased traffic, greater potential for trespass, and a greater potential for odour complaints. Therefore, an increase in smaller parcels in areas of agricultural activities provides pressure on agricultural lands.
- The Stovel peer review indicates that the DBH report should review the entrance and haul route and provide comment with respect to traffic. A traffic review study completed by C.C. Tatham & Associates Ltd. (draft January 19, 2015) provides detail on truck traffic to and from the proposed aggregate pit. Further, with respect to the 30th Sideroad, it is proposed that trucks will stop at the 30th Sideroad prior to crossing. As a result, there will be no impacts to agricultural traffic at the 30th Sideroad.
- The Stovel peer review restates the DBH mitigation measures verbatim and indicates that it is unclear where these measures are to be used. The DBH report states that the “measures may include, but are not limited to improved fencing between the respective land uses, the use of signage indicating prosecution for violation of trespassing and plantings or thorny shrub and woody vegetation as a physical barrier.” It is clearly stated that the measures would be used between “the respective land uses” (between agricultural and non-agricultural land uses).
- The Stovel peer review indicates that the “appropriateness of rehabilitating the entire site back to agriculture must be reconsidered”. The rehabilitation plan (in accordance with the Provincial Policy Statement (2014)), has indicated a rehabilitation to an agricultural after use. The DBH report has provided proposed rehabilitation guidelines for agriculture. A rehabilitation for enhance ecological purposes would need to be provided by an appropriate environmental consultant.
- The Stovel peer review indicates that the DBH report does not provide comment on the use of inert fill for rehabilitation purposes and that DBH “should provide an opinion as to the stability of the side slopes”. The DBH report provides comment on the rehabilitation of the portions of the site that will be returned to agriculture. It is understood that inert fill material may be used in areas of slope stabilization. These areas will not be returned to agriculture. As for slope stability, an engineer or other professional qualified in soil stability should be referenced.



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I trust this information is helpful. Should you have any questions or concerns, please feel free to contact me at your earliest convenience at 519-578-9226.

Sincerely

DBH Soil Services Inc.

A handwritten signature in black ink, appearing to read "D H".

Dave Hodgson, P. Ag
President