

Proposed Milton Quarry East Extension JART COMMENT SUMMARY TABLE – Progressive & Final Rehabilitation

Please accept the following as feedback from the Milton Quarry Joint Agency Review Team (JART). Fully addressing each comment below will help expedite the potential for resolutions of the consolidated JART objections and individual agency objections. **Additional, new comments may be provided once a response has been prepared to the comments raised below and additional information provided.**

	JART Comments (December 2022)	Reference	Source of Comment	Applicant Response	JART Response
Report/Date: Progressive and Final Rehabilitation Monitoring Study December 2021			MHBC		
1.	There is likely some modification to the pre-development bedrock aquifer due to extraction in the main quarry (which remains dry) as well as the North Quarry and West and East Cells. This has not been discussed in the documentation provided for the MQEE in terms of cumulative impacts, however some impact must be present (see comment #1 in Geology and Water Resources table).	Ecological Enhancement Plan and Progressive and Final Rehabilitation	Daryl W. Cowell		
2.	In the absence of pre-extraction impact assessments, my primary concern is that existing groundwater conditions be restored to the extent possible. The rehabilitation of the MQEE (pending approval of the application) by lake filling supported by well injection recharge via the WMS is preferred to maintaining a dry quarry post-extraction. Although final levels and fracture flow probably won't exactly mimic pre-quarry conditions (pre all quarries and extensions in the area) it is preferable to dry quarry conditions. On-going post lake filling monitoring should ensure that "water bearing" fractures (see comment #1 in Geology and Water Resources table) are reactivated to the extent possible.	Ecological Enhancement Plan and Progressive and Final Rehabilitation	Daryl W. Cowell		
3.	Without long-term monitoring of non-native species in place, the forests, islands and wetlands in the proposed rehabilitation plan will become dominated by non-native invasive species, most likely Common Reed, Common and Glossy Buckthorn and Reed Canary-grass. A long-term monitoring plan should be outlined for all areas that will be restored as well as those that will be rehabilitated.	Progressive and Final Rehabilitation Monitoring Study	Sarah Mainguy, NSE		
4.	<p>It is not clear to what extent the mitigative measures for maintaining natural heritage features such as wetlands will be required following quarry operations and lake filling. These measures involve pumping of water into recharge wells and direct discharge into wetlands to maintain and enhance natural features and their functions during quarry operations up until site closure. It is understood that existing agreements are in place with agencies that will be assuming land ownership following site closure for the existing approved quarry operations</p> <p>For the MQEE, the issue of perpetual pumping requirements has not been fully addressed in terms of a) justification, b) the full extent to which this will be required, and c) the long term financial implications to the agency responsible for the long term management of this system. It is anticipated that these issues have been addressed in the agreements and approvals for the existing Dufferin quarry operations, although there is no discussion or resolution of these issues with respect to the MQEE.</p> <p>The Progressive and Final Rehabilitation Monitoring Study has identified various policies of The Niagara Escarpment Plan, The Provincial Policy Statement, Region of</p>	Post Closure Conditions (Issues list item 4.1)	Norbert M. Woerns		

	<p>Halton Official Plan, and Town of Halton Hills Official Plan.</p> <p>The following Halton Region Official Plan policies pertinent to quarry rehabilitation and closure do not appear to have been sufficiently addressed;</p> <p>Halton Region Official Plan (June 19, 2018) - Part III, Section 110 (8) (c.1) where the proposal to designate new or expanded Mineral Resource Extraction Areas is required to give consideration to 'cumulative impacts of the proposal and other extractive operations in the general area,' Existing quarry impacts have not been identified in detail with respect to the MQEE. See Comment 79 in <i>Geology and Water Resources Table</i> (Issues list item 1.33).</p> <p>The MQEE has not considered 'financial impact to Regional infrastructure', as per Halton Region Official Plan, Sections 110 (7.6), Sections 187(10)(q), and the 'risk of financial public liability during and after extraction where continuous active on-site management is required', Sections 110(8)(e). These policies may have been addressed as part of the existing agreements between Dufferin Aggregates and various agencies. However, the implications of these policies have not been addressed in the Progressive and Final Rehabilitation Monitoring Study for the MQEE.</p> <p>The requirement for ongoing pumping to maintain artificially low groundwater levels as part of the proposed rehabilitation plan, is contrary to Halton Region Official Plan policy 110 (8.2) which states 'Discourage the use of adaptive management plans or similar measures that will require continuous or perpetual active on-site management post rehabilitation'. Clarification is required of how this policy has been addressed.</p>				
5.	<p>Include an invasive species monitoring plan for all areas identified for enhancement and/or rehabilitation.</p>		CH		