



Anthony G. Goodban, B.Sc., M.E.S.(Pl.), MCIP, RPP
Goodban Ecological Consulting Inc. (GEC)
879 Cabot Trail, Milton, ON L9T 3W4
Mobile: (905) 691-0774
E-mail: anthony.goodban@sympatico.ca

MEMORANDUM

**To: Caitlin Port
MHBC Planning**

**CC: Chris Isley
Cambridge Aggregate Services Inc.**

From: Anthony Goodban

Date: October 25, 2023

Re: GEC Response to NRSI Peer Review Letter dated October 19, 2023

Natural Resource Solutions Inc. (NRSI) was retained by the Regional Municipality of Waterloo to undertake a peer review of a Natural Environment Technical Report (NETR) and Environmental Impact Study (EIS) prepared by Goodban Ecological Consulting Inc. (GEC), for the proposed Edworthy West Pit in the Township of North Dumfries. NRSI prepared a peer review letter report dated June 27, 2023. GEC provided detailed responses to NRSI's peer review comments on August 3, 2023.

NRSI prepared a second peer review letter report dated October 19, 2023. The key points in NRSI's recent letter include the following:

- The majority of the peer review comments provided by NRSI have been adequately addressed through GEC's responses and proposed updates to the Site Plans;
- NRSI's comments with respect to Species at Risk (SAR) have been addressed. MECP has also confirmed GEC's approach to SAR and indicated that no authorization will be needed under the *Endangered Species Act (2007)*;
- *"Overall, NRSI staff are in agreement with the approach proposed in GEC's response letter and support the identification of restoration details within the Site/Operation Plans as opposed to the creation of a separate Ecological Monitoring Plan. It is anticipated that the incorporation of these monitoring requirements into the Site/Operation Plans will adequately guarantee their completion. It is recommended that consideration be given to extending the monitoring period from 2 to 5 years post-planting in order to more effectively evaluate whether the desired vegetation communities have successfully established within the subject property. It is our opinion that monitoring could be completed in Year 1, 3 and 5, rather than on an annual basis for a 2-year period. This would result in the overall monitoring effort only slightly increasing, but allow for longer period of monitoring to be completed. The results of monitoring should be used to inform adaptive management*

decisions such as plant replacement or species substitution in order to ensure the success of the restoration area, as proposed by GEC in their response letter. Consistent with the recommendations made in the response letter, it is recommended that the restoration monitoring report be submitted to the Region of Waterloo and other reviewing agencies at the end of the monitoring period.”

- *“Based on our review of the response letter and BHA submitted by GEC, it is NRSI’s position that the mitigation, restoration, and enhancement measures proposed are likely to effectively support the protection of the existing natural features that will be retained. Comments and recommendations made within NRSI’s initial peer review letter (June 27 2023) have primarily been addressed through the recently submitted materials. As noted above, it is recommended that the proposed ecological monitoring period be increased from a 2-year to a 5-year monitoring period in order to more effectively evaluate the successful establishment of the desired vegetation communities. It is also recommended that the restoration monitoring report be submitted to the Region of Waterloo at the end of the monitoring period.”*

Please note that the proposed Ecological Monitoring Plan provides for monitoring to occur annually, following commencement of ecological enhancement activities at the site. Site Plan Sheet 3 (Rehabilitation Plan) – Ecological Enhancement Note 5) includes this statement:

“...monitoring shall occur several times each year (minimum of two visits per year during the growing season), following commencement of EEP activities (e.g., tree-planting).”

Monitoring ecological enhancement and rehabilitation units on an annual basis will provide timely monitoring data that may trigger corrective actions during that particular growing season (e.g., treatment for pest infestation, control of newly-established invasive species, etc.) and/or inform future ecological enhancement or rehabilitation activities (e.g., adjust custom seed mix composition, adjust species selections for woody plantings, etc.).

GEC recommends that the reporting cycle for ecological enhancement and rehabilitation activities be extended from a 2-year monitoring period to a 5-year monitoring period, as also recommended by NRSI.

GEC recommends updating Site Plan Sheet 3 (Rehabilitation Plan) – Ecological Enhancement Note H.6), as follows in **redline**:

*“Upon commencement of ecological enhancement activities, **an biennial ecological monitoring report shall be completed for each 5-year period until final rehabilitation is complete, and kept on file.** The **biennial 5-year** ecological monitoring report shall be completed no later than June 30th following the end of the **secondfifth** year. The ecological monitoring report shall be **made availablecirculated** to the MNRF, Regional Municipality of Waterloo, **and Township of North Dumfries and Grand River Conservation Authority upon request.** The monitoring report shall document the ecological enhancement and rehabilitation activities completed during the **twofive** preceding **calendar 5-years period** and demonstrate that the components of the Ecological Enhancement Plan & Rehabilitation Plan are being successfully implemented. The monitoring report shall also include any recommendations that may increase the success of enhancement and rehabilitation measures in subsequent years.”*

The following is the same Note H.6) with the **redline** changes made:

“Upon commencement of ecological enhancement activities, an ecological monitoring report shall be completed for each 5-year period until final rehabilitation is complete. The 5-year ecological monitoring report shall be completed no later than June 30th following the end of the fifth year. The ecological monitoring report shall be circulated to the MNRF, Regional Municipality of Waterloo and Township of North Dumfries. The monitoring report shall document the ecological enhancement and rehabilitation activities completed during the preceding 5-year period and demonstrate that the components of the Ecological Enhancement Plan & Rehabilitation Plan are being successfully implemented. The monitoring report shall also include any recommendations that may increase the success of enhancement and rehabilitation measures in subsequent years.”

GEC appreciates the opportunity to address NRSI’s detailed peer review comments. This peer review process initiated by the Region of Waterloo has resulted in overall improvements to the proposed Edworthy West Pit application from a natural environment perspective.