



June 16, 2025

Project No. 19126620

Koren Lam

County of Lanark
99 Christie Lake Road
Perth, ON K7H 3C6

**RESPONSE TO JP2G CONSULTANTS INC. REVIEW COMMENTS ON PROPOSED HIGHLAND LINE PIT
NATURAL ENVIRONMENT REPORT, TOWNSHIP OF LANARK HIGHLANDS, ONTARIO (#626599)**

Dear Koren,

In a letter to the County of Lanark Highlands dated November 15, 2023, JP2G Consultants Inc. (JP2G) provided a peer review of the Natural Environment Report (NER) prepared by Golder Associates Ltd. (now WSP Canada Inc.) in support of the Thomas Cavanagh Construction Limited (Cavanagh) proposed Highland Line Pit, Lanark Highlands, ON. In response, Cambium Inc. provided additional information to JP2G in a letter dated January 10, 2025.

In a letter dated February 14, 2025 (Appendix A), JP2G concluded that: *Cambium has satisfactorily addressed our November 15, 2023 comments and we trust that these revisions (where applicable) will be reflected in the final revised Natural Environment Report.*

In conclusion, it is our opinion that there will be no negative impacts on the natural heritage features identified on/adjacent to the site as a result of the proposed development on the subject lands, and that the proposed development will be consistent with the Natural Heritage Policies of the PPS, the Natural Heritage Policies of the County of Lanark Sustainable Communities Official Plan as well as the Landform Specific Policies of the Township of Lanark Highlands Official Plan, provided that:

- 1) *The recommended mitigation measures from the NER (as revised by comments received) are properly implemented/adhered to;*
- 2) *The March 12, 2024 letter from the Department of Fisheries and Oceans is adhered to including properly implementing the mitigation measures outlined in the letter (if applicable), etc.;*
- 3) *As per MECP's April 26, 2024 email (as included in Cambium's January 10, 2025 response to Jp2g comments), the proponent ensures compliance with the ESA and will notify MECP of any changes to project activities, etc.; and*
- 4) *Any other public/agency comments related to natural heritage matters are satisfactory addressed.*

As no revised NER is being prepared, the purpose of this submission is to summarize where these commitments and revisions have been incorporated into various project documents, as outlined below.

Response to Provision #1:

All mitigation measures noted in the original NER have been incorporated on to the Operations Plan and Rehabilitation Plan for the project, which have also been updated to include additional measures identified through consultation with peer reviewers, agencies and the public. These documents will continue to be updated based on the outcomes of on-going agency consultation, as necessary.

Response to Provision #2:

The Operations Plan has been updated to include the mitigation measures outlined in the March 12, 2024 Fisheries and Oceans Canada (DFO) letter.

Response to Provision #3:

WSP continues to work directly with the Ministry of the Environment, Conservation and Parks (MECP) as it relates to species at risk (SAR), and Cavanagh will notify the MECP of any interactions with SAR that may occur during site preparation, operations or rehabilitation at the site.

Response to Provision #4:

Through the application processes under both the *Aggregate Resources Act* and *Planning Act*, Cavanagh has been responding to all agency and public comments. The test for assessing impacts on natural heritage matters should be based on demonstrating compliance and/or conformity with applicable provincial and municipal policies. Satisfying all public comments related to natural heritage should not be used as the measure to demonstrate compliance with these policies.

Additional Provision:

It is also understood from the comment response to Algonquins of Ontario (AOO) comment no. 7 that the turtle exclusion fencing will be removed post development. For clarity, a note should be added to the rehabilitation plan to this effect.

Response to Additional Provision:

The Rehabilitation Plan has been updated to include this item.

If you have any questions on this submission, please contact the undersigned.

Yours truly,

WSP Canada Inc.



Gwendolyn Weeks, H.B.Sc.Env.
Lead Ecologist



Daniel Eusebi BES, RPP, MCIP
Senior Principal Ecologist

GAW/DE/ld

CC: Phil White, Thomas Cavanagh Construction Limited
Neal DeRuyter, MHBC Planning

Appendices: Appendix A - February 14, 2025 letter from JP2G Consultants Inc.

[https://wsonline.sharepoint.com/sites/gld-112126/project files/6 deliverables/response to comments/08 ner peer reviewer/19126620-response to jp2g peer review final letter_june 2025_draft.docx](https://wsonline.sharepoint.com/sites/gld-112126/project%20files/6%20deliverables/response%20to%20comments/08%20ner%20peer%20reviewer/19126620-response%20to%20jp2g%20peer%20review%20final%20letter_june%202025_draft.docx)

APPENDIX A

JP2G Consultants Inc. Letter

Jp2g No. 20-7064K

February 14, 2025

County of Lanark
99 Christie Lake Road
Perth, ON K7H 3C6

Attn Mike Dwyer, Planning Manager
mdwyer@lanarkcounty.ca

**Re NER Peer Review – Highland Line Pit
Part Lot 5, Concession 10,
Township of Lanark Highlands
County of Lanark
County File No. 0940-OP-23004 - Highland Pit OPA.**

Dear Mike:

I have reviewed the following information in relation to the above-mentioned application:

- *Response to JP2G Consultants Inc. Peer Review Comments on Proposed Highland Line Pit Natural Environment Report, Township of Lanark Highlands, Ontario (#626599), dated January 10, 2025, prepared by Cambium;*
- *Response to MNR Review Comments on the Proposed Highland Line Pit Technical Reports, Township of Lanark Highlands, Ontario (Aggregate Resources Act Application #626599), dated January 10, 2025, prepared by Cambium;*
- *Response to Comments from Mark Heaton, Ecologist – Proposed Highland Line Pit Natural Environment Report, Township of Lanark Highlands, Ontario (Aggregate Resources Act Application #626599), dated January 10, 2025, prepared by Cambium;*
- *Letter from Fisheries and Oceans Canada Re: Aggregate Pit, Barber's Lake, Long Sault Creek, Township of Lanark Highlands – Implementation of Measures to Avoid and Mitigate the Potential for Prohibited Effects to Fish and Fish Habitat, dated March 12, 2024;*
- *Response to AOO Comments on Aggregate Resources Act Licence Application #626599, Thomas Cavanagh Construction Limited Proposed Highland Line Pit, Township of Lanark Highlands, County of Lanark, dated January 15, 2025, prepared by MHBC; and*
- *The Highland Line Pit Revised Site Plan, dated January 13, 2025, prepared by Brian Henderson.*

We appreciate the comments from our November 15, 2023 letter being addressed and for the additional information that Cambium has provided in their January 10, 2025 Peer Review Response letter to our comments. Cambium has satisfactorily addressed our November 15, 2023 comments and we trust that these revisions (where applicable) will be reflected in the final revised Natural Environment Report.

We have also reviewed Cambium's response to other comments received as noted above, as they relate to the natural heritage features on/adjacent to the site. It is also understood that Cambium has circulated the NER and related information to DFO and MECP (among other agencies such as MNR, AOO etc.) and that MECP has confirmed that the project will not require approvals under the *Endangered Species Act* (Ontario 2007). It is also understood that DFO have confirmed that no authorization under the *Fisheries Act* is required for this project but have recommended some mitigation measures such as limiting impacts on riparian vegetation, operation of machinery, develop/implement a sediment and erosion control plan, develop/implement a response plan and



preventing the spread of aquatic invasive species. The applicant could consider adding the recommended mitigation measures from DFO on the site plan, however, it is understood that no works will occur within 30 metres of any surface water features.

It is also understood from the comment response to AOO's comment no. 7 that the turtle exclusion fencing will be removed post development. For clarity, a note should be added to the rehabilitation plan to this effect.

In conclusion, it is our opinion that there will be no negative impacts on the natural heritage features identified on/adjacent to the site as a result of the proposed development on the subject lands, and that the proposed development will be consistent with the Natural Heritage Policies of the PPS, the Natural Heritage Policies of the County of Lanark Sustainable Communities Official Plan as well as the Landform Specific Policies of the Township of Lanark Highlands Official Plan, provided that:

1. The recommended mitigation measures from the NER (as revised by comments received) are properly implemented/adhered to;
2. The March 12, 2024 letter from the Department of Fisheries and Oceans is adhered to including properly implementing the mitigation measures outlined in the letter (if applicable), etc. ;
3. As per MECP's April 26, 2024 email (as included in Cambium's January 10, 2025 response to Jp2g comments), the proponent ensures compliance with the ESA and will notify MECP of any changes to project activities, etc.; and
4. Any other public/agency comments related to natural heritage matters are satisfactory addressed.

Yours truly,

Jp2g Consultants Inc.

A handwritten signature in dark ink, reading 'Bryana Kenny'.

Bryana Kenny, B.Sc. (Hons.)
Biologist | Planner