



DILLON
CONSULTING

**WASTE CONNECTIONS OF CANADA (WASTE
CONNECTIONS)**

Biology Work Plan (Final)

Ridge Landfill Expansion EA

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1.0 Project and Work Plan Overview

This Biology Assessment work plan has been prepared to support the environmental assessment (EA) for the Ridge Landfill expansion, and is based on the commitments made in the final amended Terms of Reference (ToR) for the EA that was approved by the Ministry of the Environment and Climate Change (MOECC) in May of 2018.

Waste Connections of Canada (Waste Connections) is proposing an expansion of the Ridge Landfill in order to continue to provide long-term residual disposal capacity for the company's large IC&I customer base, and as a regional and inter-regional waste management facility to serve the projected increase in population and economic growth in southern and central Ontario.

The Ridge Landfill has been in operation since 1966, and was previously expanded in 1999. Waste Connections owns 340 hectares (ha) of land at the Ridge Landfill. The existing Landfill Site Area, which is permitted by an ECA from the MOECC for waste management and environmental work purposes, is 262 ha. The area within which waste disposal is permitted, called the Waste Fill Area, is 131 ha or half of the Landfill Site Area. As of December 2017, it is estimated that the existing Waste Fill Area at the Ridge Landfill site will provide waste disposal capacity until approximately 2021 at the current fill rate.

The current approved capacity for the Ridge Landfill is 21 million cubic metres (m³). The site is approved to accept a maximum of 1,300,000 tonnes of waste per year (the MOECC approved annual waste disposal rate). The EA does not propose to increase the maximum annual fill rate (this would remain as-is); however, Waste Connections is seeking the EA to increase the life of the facility for a 20 year planning period, from 2022-2041.

The waste being landfilled is approximately 98% IC&I waste and 2% residential waste. As part of the EA approval, Waste Connections would agree to reduce their IC&I service area from all of Ontario to just southern and central Ontario, and their residential service area from Chatham-Kent and the neighbouring counties of Essex, Lambton, Middlesex and Elgin, to only the Municipality of Chatham-Kent.

This Biology Assessment work plan outlines the tasks to support the evaluation of alternative methods, and to undertake an impact assessment once the preferred alternative method is determined. The following paragraphs provide a brief summary of the scope of the Biology Assessment work, including protocols and/or standards to be adhered to while work is undertaken.

The Biology Assessment will seek to identify potential impacts to the biology which includes flora and fauna within the On-Site Study Area, that could potentially be impacted by the proposed landfill expansion. The objectives of the Biology Assessment are as follows:

- Establish the baseline conditions at the proposed site with respect to biological resources;
- Carry out an assessment of potential biological impacts for each of the proposed landfill expansion site development alternatives (i.e., alternative methods); and

- Prepare a biological management plan for the purpose of mitigating potential impacts.

The scope of the Biological Assessment will include a careful review of background information along with a comprehensive field investigation program which will examine habitat types ranging from crop fields, cultural meadows, woodlots, wetlands, ponds and water courses, and extensive inventories that have been collected to date. This will include an examination of various data sources to determine the local significance of each species documented, followed by an examination of potential impacts from the proposed landfill expansion alternatives (i.e., site development alternative methods) on these species. The criteria and indicators that will be applied for the purpose of the assessment will include:

1. Removal of habitat types as listed above and potential impact on wildlife and flora after mitigation measures are applied (i.e. relocation of wildlife/creation of new habitat).
2. Changes in habitat types, and potential long term impacts on wildlife within the On-Site Study Area.

A comparative evaluation and ranking of the proposed landfill expansion alternatives will be undertaken based on the results of the impact assessment with the objective of predicting the potential net effects associated with each alternative.

Following the selection of the preferred landfill expansion alternative, a biological management plan will be developed with the goal of maintaining remaining woodlots, creating a strategy to replace lost woodlot/wetland habitat, and preserving the overall health of watercourses that may flow through or around the landfill area.

A summary of additional commitments for the Transportation assessment is provided below.

Commitment	Reference to applicable section in EA or supporting document
<p>The EA will determine the potential effects of the Project on the natural, cultural, socio-economic and transportation environments within the study areas. Potential effects can be short-term or long-term, direct or indirect and positive or negative. The EA will also identify ways to reduce or mitigate potential negative effects on these environments and will consider our changing climate.</p>	<p>Section 4.2 and 4.3 of this work plan addresses how natural environment baseline conditions will be documented. Section 4.4 of this work summarizes the impact assessment criteria and indicators. The identification of ways to reduce or mitigate potential negative effects will be addressed in the EA; Section TBD.</p>
<p>Waste Connections will consider the form and function of natural features during the EA.</p>	<p>Sections 4.2 through 4.3 of this work plan addresses how natural environment baseline conditions will be documented. Section 4.4 of this work summarizes the impact assessment criteria and indicators.</p>

Commitment	Reference to applicable section in EA or supporting document
The potential need for a wetland evaluation will be considered during the EA.	Section 4.2.1 of this work plan addresses how natural features will be assessed as part of the EA. The need for wetland evaluation will be completed during agency consultation as part of the EA.
Waste Connections will appropriately consider hedgerows in the evaluation of alternatives and the impact assessment to be completed during the EA.	Section 4.2.1 of this work plan addresses how natural features (include hedgerows) will be assessed as part of the EA while Section 4.4 of this work summarizes the impact assessment criteria and indicators.
Waste Connections will continue to use best practices and MNRF guidelines and requirements for conducting field work.	Section 4.2 and 4.3 of this work plan address how baseline conditions will be documented, of which our field methods are consistent with industry best practices and agency approved methodology. The MNRF have been consulted throughout the biology field program in support of the EA.
Waste Connections will continue to engage the Municipality of Chatham-Kent and the Ministry of Natural Resources and Forestry to ensure that potential effects to woodlots and/or other natural features are mitigated, as appropriate.	Consultation with the Municipality of Chatham-Kent and the Ministry of Natural Resources and Forestry as it relates to the potential effects to woodlots and/or natural features has been, and will continue to be, observed as part of the EA process.
Surveys will be undertaken in accordance with MNRF requirements and industry best practices. Details as to protocols followed, agencies having authority, etc., will be provided in the EA.	Section 4.2 and 4.3 of this work plan address how baseline conditions will be documented, of which our field methods are consistent with industry best practices and agency approved methodology. The MNRF have been consulted throughout the biology field program in support of the EA.
The project will be reviewed for potential <i>Fisheries Act</i> implications and next steps.	The determination of whether there is potential for <i>Fisheries Act</i> implications and/or next steps will be completed during the EA consultation process.
The significance of natural features will be determined based on MNRF and planning protocols, including the Provincial Policy Statement (PPS)	Section 4.2 and 4.3 of this work plan address how baseline conditions will be documented, and significance assessed, based on industry best practices and agency approved

Commitment	Reference to applicable section in EA or supporting document
and Significant Wildlife Ecoregion Schedules. This will be documented in the EA.	methodology and guidance documents. The significance of natural features will be addressed in the EA; Section TBD.
<p>Waste Connections will consider the following criteria as part of the evaluation of alternative methods and the impact assessment of the preferred alternative method:</p> <ul style="list-style-type: none"> • Potential loss of habitat of Endangered or Threatened species • Potential loss of medicinal or other culturally sensitive species of importance to First Nations groups 	<p>Section 4.4 and 4.5 of this work plan identify the impact assessment criteria and indicators for evaluating the alternative and preferred alternatives methods. Habitat of Endangered or Threatened species as well as transplanting of herbaceous plants and shrubs will be considered as part of the evaluation process.</p>

2.0 Ridge Landfill Biology

This work plan documents how the Biology discipline will be studied to support the Environmental Assessment (EA) for the proposed expansion of the Ridge Landfill, which is owned and operated by Waste Connections of Canada (Waste Connections).

2.1 Baseline Conditions

Baseline conditions for biology were first investigated through various background and field studies that were conducted in 1990, 1991, 1995, and 1996, with the results of these studies being presented in the Ridge Landfill Expansion Environmental Assessment document in 1997.

The stages or tasks examined through the impact assessment included:

1. Identification of biological conditions on the site, in its vicinity (i.e. within 1 km of the site boundary and along the haul route) and in a broader regional context;
2. Identification of biological removals and disturbances caused by the landfill development and operation;
3. Recommended mitigation measures;
4. Assess significance of anticipated net effects; and
5. Identification and development of monitoring programs and contingency measures where necessary.

Field investigations were conducted throughout the entire site which included studies along several municipal drains, woodlots, an orchard and active agricultural land.

The baseline inventory work for biology included documentation of plant, tree, wildlife, breeding birds, herpetofauna (amphibians and reptiles), benthics and fish. The significance of this work was examined by comparing results to applicable policy documents at the time (i.e. pre 1997), and highlighting the occurrence of sensitive flora and fauna within the site boundaries.

Due to changes in site ownership, waste diversion methods (i.e. recycling, composting), changes in vegetation communities, cropping patterns and new legislation (i.e. *Species at Risk Act/Endangered Species Act* (both Federal/Provincial); *Migratory Bird Convention Act* and others), and a time frame of approximately 19 years, it is necessary to revisit site work that was conducted at the Ridge landfill site to ensure that the biological information is current.

Some biological investigations were conducted in 2015, and are still ongoing during the 2016 field season; however these were focused on the SE and SW on-site woodlots for the purpose of assessing the possibility of removing them. Changes in flora/fauna significance as well as the applicability of new legislation will provide further baseline conditions and criteria as this project progresses.

3.0 Study Area

For the purposes of the Biology Scope of Work, the study area has been defined as follows:

- On-Site Study Area (“on-site”) – includes the property on which the current Ridge Landfill and proposed expansion is situated. Assessment of the entire Ridge Landfill property will identify potential effects of different site development alternative methods (e.g., impacts to significant wildlife habitat or removal of on-site woodlots).

The proposed expansion would not impact biological features off-site or along the designated landfill haul route. Therefore, off-site and haul route study areas are not proposed to be included for the biology discipline.

4.0 Work Plan for Biology

In this regard, most of the stages and tasks identified in 1997 are still valid, and moving forward, should form the genesis of the Biology component of the Ridge Landfill Expansion EA.

4.1 Agency Consultation

While background agency consultation was conducted during the 1997 EA process, agency consultation with the Ministry of Natural Resources and Forestry (MNRF) has become more sophisticated especially in light of the ongoing updates related to endangered species.

From reviewing the results of field studies collected in 2015/2016, and various websites, additional work is needed to characterize the remainder of the site (the 2015/2016 studies were focused on the SE and SW woodlots).

These include: both terrestrial and aquatic studies; species at risk habitat investigations, and strategies to re-establish forest communities that will be removed due to landfill construction.

4.2 Terrestrial Investigations

4.2.1 Ecological Land Classification including Swamp/Wetland Studies

The concept of Ecological Land Classification (ELC) was not introduced as a formal ecological land mapping “tool” until September 1998, when the OMNR released the publication Ecological Land Classification for Southern Ontario: First approximation and its application, SCSS Field Guide FG -02. (Lee et al, 1998).

This system was a method to reduce complex natural landscapes into a small number of community based units namely, Aquatic, Wetland and Terrestrial systems. The classification of these systems was based on a combination of three variables including:

- vegetation characteristics such as structure, composition of the canopy, shrub layer and understory;
- soil characteristics including depth, texture, moisture regime, nutrient regime, and
- water table characteristics including drainage, presence of water table near the soil surface; artesian conditions, and how these characteristics would influence plant growth.

While the 1997 EA did include a detailed account of the tree canopy based on angle prism methods, as well as a vegetation inventory, limited information was provided on the “five woodland” communities as well as old fields (if any)/hedgerows/agricultural headlands that occurred within the On-site Area. In terms of definition, “old fields” refer to agricultural fields that have remained in a fallow or uncultivated state for at least 5 years, and are becoming naturalized with perennial and/or shrub thicket vegetation. “Hedgerows” refer to narrow bands of trees that occur between agricultural fields, while “agricultural land” refer to those fields that are cropped on an annual basis.

These “five woodland” areas included the Northern, SE and SW Woodlots as well as small, clusters of trees that were identified in the 1997 study. It was also noted that the term “swamp” (which is now used in the Ontario Wetland Evaluation System (OWES) to describe wetlands with > 25% wooded cover) was used in very general terms, and no reference was made to topsoil or soil moisture regime within the forest communities.

As a result of recent field investigations in 2015 and 2016, it was also noticed that the condition of the forest canopy had changed significantly from 1997 onwards, due to the “invasion” of emerald ash borer that had rapidly spread through southwestern Ontario, and had killed thousands of ash trees as a result of their feeding activity.

In this regard, the red and white ash that had dominated the forest canopy (i.e. 50 to 69%) within the Ridge forests in 1997 had significantly died back allowing silver maple and other species to dominate the canopy.

It was also noticed that increased light levels in the shrub and understory layers had allowed greater plant diversity to become established in these lower areas.

Through initial ELC work carried out in 2015, several “swamp” communities dominated by silver maple, Freeman’s maple, shagbark hickory and white elm did exist, but appeared to have limited to no standing water by the time that all leaves had emerged.

Therefore, these findings do question the need for additional ELC field studies later in the growing season to determine if such communities are true wetlands (as described in the OWES and defined in the

Provincial Policy Statement,), or if they are considered Fresh-moist forests with low lying areas that remain for longer periods of time.

Action - Additional studies would include the inspection of topsoils within the forest community to determine if long term saturation of the soils is widespread or localized. This would include the excavation of soil test pits, and examination and comparison to various manuals to determine if strong mottling or gulleys are present. Such conditions are an indicator of long term soil saturation. Such studies would be conducted in the late summer and early fall by an agrologist and/or staff that have training in Ecological Land Classification.

4.2.2 Significant Tree Species

In the 1997 EA document, several tree species including Big shellbark hickory, pin oak, and Shumard oak were reported to be present in both the Northern and Southeast woodland; however, 2015 field work did not identify these species. Therefore, further studies are required to determine if in fact these species are present.

While none of these species are considered threatened or endangered, they are all considered rare in southwestern Ontario. It should be noted that these species are moisture tolerant, and can grow in wet soils. In this regard, such species (if present) would be considered as part of the scoring criteria if the OWES protocol was applicable to true wetlands or swamps that were 2 ha or greater for each woodland.

Action – Further studies by an ISA certified arborist are required during the late growing season (August to October) to determine if these tree species are present, and if they are growing in saturated conditions.

4.2.3 Grassland Bird Species

The 1997 EA did report the presence of several bird species including chimney swift, barn swallow, bobolink and eastern meadowlark. While these species were not significant in 1997, the introduction of the species at risk lists has found that all four species are now considered to be significant (i.e. Threatened or Endangered according to either the provincial or federal Species at Risk schedules). It should be noted that the 2015 field studies was only focused on the wooded areas of the property, and did not examine agricultural fields that were fallow, fields, the On-Site orchard, or buildings where these species typically reside.

Action – Further studies across the site will be required to determine the presence/absence of these grassland species during the 2017 breeding season. This will also require the inspection of infrastructure (e.g. buildings, culverts) that may provide suitable nesting habitat for barn swallow that is considered Threatened.

4.2.4 Snapping Turtle Investigations

While snapping turtles are often found within streams, ponds, marshes and slow moving rivers, it is now listed in the *Endangered Species Act* as a Species of Special Concern.

Action - Further studies will be required to determine the presence/absence of this species during the 2017 season. Areas of deep water (i.e. storm water ponds) should be observed to determine if this species is present. These studies would be conducted through the summer while the water is still warm and the turtles are active.

4.2.5 Incidental Wildlife and Wildlife Habitat Observations

Dillon biologists completing the above mentioned investigations will document incidental wildlife and wildlife habitat observations including documentation of dens, tracks, scat, cavity trees, snags, etc. The focus of wildlife sightings will be the collection of information on dragonflies, butterflies, amphibians, reptiles, birds and mammal species. Potential significant wildlife habitat, identified in the Ministry of Natural Resource and Forestry's Significant Wildlife Habitat Manual (MNR 2000) will be documented as they are observed.

These significant habitats may include staging areas, vernal pools, snake hibernaculas, wildlife dens, among others. Where identified, such habitats will be mapped and reported on under **Task 3**. To reduce costs, incidental observation recordings will be completed during the same time as breeding bird and amphibian surveys.

The table below provides a summary of the field studies that were undertaken in 2015/2016. This table also recommends where further work is required, and when.

Table 1: Summary of Terrestrial Field Investigations – Ridge Landfill Site

Activity	Area completed	Additional Area to be examined	Timing/Assumptions
Breeding bird surveys	South east/south west woodland	Old fields/grasslands	Late May – early July (2 visits – 15 days apart)
Amphibian surveys	South east/south west woodland	Wet ditches/flooded agricultural fields	Late April – early June (3 visits – 2 weeks apart)
ELC/Botanical inventory	South east/south west woodland	Old fields/orchard/agricultural fields	Early May/ Late June-early July/ Late August to late Sept
Bat habitat surveys	South east/south west woodland and hedgerows	None required.	Not applicable.
Bat activity monitoring	South east/south west woodland	None required.	Not applicable.
Whip-poor-will surveys	South east/south west woodland	None required.	Not applicable.

4.3 Aquatic Investigations

As indicated in the 1997 EA report, the Ridge site does include several municipal drains (i.e. Duke, Howard) that flow through the Ridge property and outlet to off-site drains (i.e. Gales, Scott).

While these drains serve to provide drainage for existing agricultural fields in the area, they also provide habitat for at least nine species of fish that were documented in the 1997 EA as well as habitat for turtles, amphibians, mammals and birds.

As many of these drains could be disrupted or relocated during the Ridge expansion process, it is important to ensure that fish inventories are up-to-date to ensure that future mitigation strategies are appropriate. This will require confirmation with the MNRF that no SAR fish reside or have been collected in the local area, through the completion of the Information Gathering Form (IGF).

Action – Fish inventories were last conducted in the Howard and Duke Drain on May 31, 1996, and no fisheries information is available for the Gales/Scott drain. Therefore, updates are required.

In this regard, the following tasks are recommended to update fish information for the Ridge site.

- Review of background materials and information, including the existing EA report and other project-relevant documents;
- MNRF Agency Consultation to collect existing or new aquatic information, including fish species data and potential Species at Risk (SAR) information. This would include submission of the IGF;
- Procure a Licence to Collect Fish for Scientific Purposes from the MNRF;
- Conduct reconnaissance-level field investigations to document/update the condition of existing drains or drain sections on the property that aren't expected to be directly impacted by the expansion works to assist with the overall characterization of aquatic resources and habitat sensitivity;
- Conduct detailed fish habitat assessment in Duke Drain and Howard Drain where they occur in close proximity to the proposed expansion works, including habitat mapping and targeted backpack electro-fishing, and where possible, sample the fish community and determine habitat usage and type, including general water quality assessment;
- Prepare an Aquatic Habitat Summary Memo to present findings from field investigations, background review and agency input, recommended general mitigation/protection measures and anticipated permitting requirements, if any.

Assumptions for Aquatic work:

As the amount of up-to-date is extremely limited, this Scope does not include any agency permitting work or specific work relating to potential SAR that is found on the property. This would include targeted field surveys or information requests by the MNRF/DFO.

4.4 Criteria, Indicators and Data Sources for Impact Assessment of the Preferred Alternative Method

The table below summarizes the impact assessment criteria and indicators. These are consistent with those that were used during the 1997 EA.

Assessment Criteria	Indicators	Rationale	Data Sources
Assess potential loss of habitat of Endangered or Threatened species as well as medicinal or culturally sensitive species of importance to First Nations groups.	Natural features with the potential to provide habitat for Endangered or Threatened species and/or medicinal or culturally sensitive species of importance to First Nations groups subject to removal or displacement by construction and operation of the landfill expansion. Natural features include woodlands, meadows, hedgerows, watercourses and ponds.	Habitat of Endangered and Threatened species is protected under the <i>Endangered Species Act</i> , 2007 while medicinal or cultural sensitive species are considered important to local First Nation groups. The expansion of the landfill may displace habitat for species at risk as well as medicinal or cultural species relied upon by local First Nations groups.	Recent or future field work. Results from other disciplines (e.g. Design and operations/Surface Water/Hydrogeology/Agriculture). Recent Aerial Photography. Publications. ELC mapping. Personal communication with agencies and knowledgeable citizens. Traditional ecological knowledge (TEK) in consultation with First Nations groups.
Assess potential removal or displacement of biological systems.	Amount and quality of, and impact on biological systems subject to removal or displacement by construction and operation of the landfill expansion. Such systems would include: woodlands, hedgerows, watercourses, ponds, selected noteworthy species or specimens.	Biological systems subject to direct removal or displacement may experience total loss of character and function.	Recent or future field work. Results from other disciplines (e.g. Design and operations/Surface Water/Hydrogeology/Agriculture). Recent Aerial Photography. Publications. ELC mapping. Personal communication with agencies and knowledgeable citizens.
Assess potential disruption of biological systems.	Amount and quality of and impact on biological systems disrupted by construction and operation of the landfill and the haul route. Specifically, potential disruptive impacts on: Woodlands, watercourses, ponds, selected noteworthy species or specimens.	Development and operation of the landfill and haul route may disrupt biological systems without removing or displacing them causing some loss of character or function.	Recent or future field work. Results from other disciplines (e.g. Design and operations/Surface Water/Hydrogeology/Agriculture). Recent Aerial Photography. Publications. ELC mapping. Personal communication with agencies and knowledgeable citizens.

4.4.1 Assumptions for Criteria and Indicators:

To date, no Area of Natural and Scientific Interest (ANSI), Provincially Significant Wetlands (PSW) or recognized Environmentally Significant Areas have been identified within the On-Site Area or within 1 Km of the site boundary or along the Haul Route from Hwy 401. It is assumed that the quality of existing biological features and systems may change during severe weather events or other natural events. If this is the case, documentation of these changes will occur.

4.5 Reporting and Review of Alternatives for Biology

The biological assessment will be documented, and will include the updated flora/faunal inventories for the entire site. This will include the significance of each species, and whether it is at risk federally and/or provincially.

The review of the three alternatives will include analysis of how terrestrial and aquatic systems will be impacted by landfill development.

In most cases, removal will occur, but opportunities may be present to relocate/re-establish these forest communities elsewhere on the site.

Action - Reporting will summarize the efforts that have taken place to accurately describe the biological conditions that exist on-site, their significance and whether opportunities are present to avoid loss of habitat. This section will include the results of the comparison of alternatives.

4.6 Mitigation for Biology

As the extent and populations (if any) of SAR on the Ridge property is unknown at the time of writing (with exception of the SW and SE woodlands), a budget and specific details for each SAR is not known.

As with any listed species at risk, thorough knowledge is required to determine how it (or its habitat) can be preserved. For example, the habitat for barn swallows can be recreated by building suitable nesting structures adjacent to feeding areas.

For herbaceous plants and shrubs, transplanting at the appropriate time and monitoring for several years would provide successful results.

In cases where listed species are present, proposed contingency and monitoring plans will be developed for each species where possible. Further details/budget would be presented under a separate cover along with discussions with Waste Connections and MNRF.

5.0 Permitting

5.1 Endangered Species Act, 2007

Based on discussions with the MNRF Aylmer District (the District) regarding the pre-EA species at risk bat habitat and bat activity survey results, the MNRF indicated that the removal of the SE woodland would require an *Endangered Species Act, 2007* (ESA) Overall Benefit Permit (i.e. 17(2)(c) of the ESA). Generally, the Overall Benefit Permit process involves the submission of three forms:

- Information Gathering Form (IGF);
- Avoidance Alternatives Form (AAF); and,
- Overall Benefit Form or C-PAF (permit application form).

The purpose of the IGF is to gather the information Waste Connections is required to submit to the MNRF as a means to inform the Ministry's determination of whether or not a proposed activity is likely to contravene Section 9 (species protection) or Section 10 (habitat protection) of the ESA, and whether it is advisable for Waste Connections to apply for an Overall Benefit Permit. Based on the species at risk bat habitat and activity survey results, and subsequent discussions with the District, the District has already clarified that an Overall Benefit Permit under the ESA would be required for the removal of the SE woodland. Both the species at risk bat habitat and bat activity survey results reports contain the necessary information to be included in, and appended to the IGF.

The purpose of the AAF is to assist proponents in considering alternatives that would not adversely affect species at risk and/or their habitats. The submission of an AAF is required prior to a proponent applying for an Overall Benefit Permit. Based on our understanding of the proposed Ridge Landfill expansion plan, avoidance alternatives are not possible (i.e. the SE woodland requires removal as part of the expansion plan). The purpose of the Overall Benefit Form is to supply the MNRF with the necessary information for the purposes of obtaining a Minister's decision on the issuance of an Overall Benefit Permit in order to proceed with the removal of the southeast woodland, and subsequently the expansion of the Ridge Landfill. At the Overall Benefit Form or C-PAF stage, the MNRF will post a notice on the Environmental Registry (ER) with a comment period of at least 30 days.

Based on our recent MNRF meeting, the District advised that it could take 12 to 18 months from the time the Overall Benefit Permit process is initiated to the time the Minister issues an executed Overall Benefit Permit. Our fee estimate includes the submission of an IGF, AAF and Overall Benefit Form/C-PAF as well as agency consultation as it relates to the Overall Benefit Permit application for species at risk bats.