



Concerned Residents Coalition Working to Protect Your Community and Environment

31 October 2016

Subject: Coordinated Land Use Review Feedback

I am making this submission on behalf of the **Concerned Residents Coalition (CRC Rockwood Inc.)** for which I serve as President. CRC was established in 2013 in response to an application to establish a limestone quarry in Guelph Eramosa Township adjacent to Rockwood. The proposed operation would involve blasting approximately 25 metres below the water table into a water filled pit in a highly sensitive geology characterized by karst weathering, located in the Paris-Galt Moraine.

CRC represents approximately 1,200 residents in Guelph Eramosa and the abutting communities of Milton and Halton Hills. Our mission is to ensure that the quarry application is subjected to a thorough, factual, and fair science-based assessment in order that there will be no unacceptable negative impacts on the affected communities and the natural environment should the quarry be developed.

We believe that the four provincial plans being reviewed by the Province should be strengthened in order to bring key Provincial priorities into a balance that reflects a rapidly evolving social, economic and environmental reality in the 21st century. There are recommendations in the review report that CRC enthusiastically supports, but there are also a number of important gaps that our letter is intended to address.

Agriculture and Food Security

As stated in the Discussion Document for the Co-ordinated Review, southern Ontario is home to unique natural resources:

“It has some of Canada’s most important and productive farmland. Its fertile soil, moderate climate and abundant water resources support agricultural production that cannot be duplicated elsewhere in the province or country.”

The statistics are sobering:

- 1. A mere 0.5 percent of Canada is comprised of Class 1 soil (the rarest).***
- 2. Just over ½ of that 0.5 percent of Class 1 soil is in Ontario.***
- 3. So far, we have lost nearly 20 percent of this soil due to development and other non-farming activities.***
- 4. Ontario is losing up to 350 acres of farmland (not just Class 1) each day.***

Ontario boasts the largest agri-food sector in the country. It employs 740,000 people and contributes \$34-billion to the economy each year. Nearly one-half of Ontario’s fruit farms and one-fifth of its

**CRC Rockwood Inc.
P.O. Box 121, Rockwood, ON N0B 2K0
www.hiddenquarry.ca**

vegetable farms are within the Greenbelt, a critical agricultural resource. Therefore, we support tighter protections for agricultural lands within all four provincial plans and a robust Agricultural System as proposed by the government:

- ***Prime agricultural areas, including specialty crop areas, will be designated in accordance with mapping identified by the Province and these areas will be protected for long-term use for agriculture.***

Aggregate Resource Management

We also support the recommendation to apply “an agriculture lens to other provincial policies and programs (such as climate change, transportation and infrastructure, financial tools, community improvement plans, and education) to address the unique needs of agriculture in the GGH.” We would add to this list of policies and programs the issue of aggregate resource management, and in that regard strongly recommend the following:

- **Applications for aggregate extraction must be accompanied by an Agricultural Impact Assessment.**
- **Pits and quarries should not be allowed on Class 1, 2, 3 or 4 soils (prime farmland) within the provincial plans.**
- **There should be a ban on any aggregate extraction below the water table.**

The impact of aggregate extraction operations is often under-estimated by their designation as “interim land uses.” While it is sometimes true that pits and quarries are not permanent, in many instances their life cycles extend for decades if not generations, which is inconsistent with the spirit, if not the literal meaning, of the term interim. On the other hand, quarries are permanent in the sense that the land is removed forever from any agricultural use. Furthermore, the impacts of such operations on water and natural heritage systems often are permanent, regardless of the life cycle of the operation. We recommend:

- **that greater discrimination be applied to operations that are relatively short-term or interim and those that are long-term so that projected cumulative impacts over the life cycle of proposed operations be fully and reasonably taken into account.**

In view of the number of contested pit and quarry applications throughout Ontario, it is clear to us that current policy on aggregate extraction is broken. Therefore, we support the findings of the review report regarding the protection of natural and cultural heritage resources “to develop a long term strategy for ensuring the wise use, conservation, availability and management of aggregate resources.”

Water Resources Protection and the Moraines

The proposed strengthening of the four provincial plans also includes better protections for Ontario’s water resources. We fully support enhanced protection for key water sources as outlined in the proposed plan revisions.

Clearly, water supply and security even in relatively water-rich Ontario, is under threat from climate change and increasing development. Wellington County, which is one of the richest agricultural regions

in the Province, has been experiencing drought conditions during the past three to five years at least. While water-taking by the bottled water industry has captured the attention of government with a proposed moratorium on new water-taking licences and expansion of existing licences, it is important to also address the impact on groundwater and surface water resources by aggregate operations such as the one proposed for Guelph Eramosa. This area, like much of Ontario, derives its municipal and private water supplies from groundwater aquifers and surface water from key watersheds. **The priority of protection and conservation of such water resources needs to be elevated above the competing priority for new aggregate sources.**

In part this will necessitate more stringent protections applied to key watershed recharge areas. While one of the land use reports considered in this review is for the Oak Ridges Moraine, we hold that the Province must place similar importance on the Paris-Galt and Waterloo Moraines. As noted by the Environmental Commissioner of Ontario (2015):

The Waterloo Moraine spans approximately 400 square kilometres of the Grand River watershed in the Region of Waterloo. The municipalities of Waterloo and Kitchener have developed on the central portion of the moraine. The multi-aquifer provides water to the majority of Kitchener/Waterloo inhabitants and those in rural areas west of the municipalities.

The Paris and Galt Moraines extend 560 square kilometres from Caledon to Norfolk County. The moraines are significantly lower in relief than the Waterloo Moraine and have a relatively permeable surface geology. These features contribute to high levels of recharge into the moraines, supporting coldwater streams and wetlands. While the moraines are not subject to imminent development pressures, Guelph and Cambridge are set to reach density targets by 2031. Significant aggregate extractions are also occurring on the Paris and Galt Moraines.

While not as large an area as the Oak Ridges Moraine at 1200 square kilometres, these moraines are critically important as water recharge areas for the watersheds that provide water to the communities in the “tri-city” area. In view of the existence of drought conditions and the increasingly evident impact of climate change, we recommend that

- ***the Province prohibit both commercial water-taking and aggregate extraction operations in the Paris-Galt and Waterloo moraines.***

Expansion of the Greenbelt

We support the recommended expansion of the Greenbelt to encompass contiguous, environmentally sensitive areas. At present, there are artificial boundaries to the Greenbelt as exemplified by the boundary between Halton Region and Wellington County, Highway 7. Natural features including sensitive groundwater and surface water resources extend continuously from the Greenbelt area to the south of Highway 7 northward following the Paris-Galt Moraine with its stream tributaries and wetlands. And yet, we have Greenbelt on the south side of the highway and not on the north.

We recommend specifically:

- **That the Greenbelt be expanded to include the Paris-Galt and Waterloo Moraines in view of their critical importance as watershed recharge areas.**

Desirable though more Greenbelt is, it is unconscionable in our view that aggregate extraction is still permitted in sensitive, and otherwise protected, greenbelt lands. We therefore recommend that:

- ***The Province prohibit aggregate extraction in the Greenbelt.***

Summary

We commend the Province for undertaking this review of its land-use planning policies and programs, and we support the enhancements recommended in the summary report. As noted above, we recommend the further strengthening of a number of policies in order to re-balance the competing priorities of social, economic and environmental considerations, and the management of aggregate resources.

Sincerely

A handwritten signature in black ink, appearing to read "Doug Tripp". The signature is written in a cursive, slightly slanted style.

Doug Tripp

President, CRC