



Township of Perry

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May 7, 2020

Ministry of Natural Resources and Forestry

Dear MNRF Resource Development Coordinator:

Re: Proposed changes to the Aggregate Resources Act (ARA) Regulations (O.Reg. 244/97) and the Aggregate Resources of Ontario Provincial Standards

Staff at the Township of Perry are pleased to review ERO # 019-1303 - Proposed changes to the Aggregate Resources Act (ARA) Regulations (O.Reg. 244/97) and the Aggregate Resources of Ontario Provincial Standards.

We understand comments were to be submitted by March 30, 2020 and the deadline has been extended to May 15, 2020. The following are several comments for consideration.

1. The Township of Perry is extremely concerned about the protection of our water resources. Staff are please to see some direction to strengthen the Act, the Regulation and Provincial Standards to protect this valuable resource. However, requiring a minimum of one year of groundwater monitoring for new applications is unreasonable. It does not account for sufficient seasonal variations and/or influences due to changing weather patterns. Climate Change is a reality and severe rain events or severe drought will impact the "maximum predicted water table". Additional monitoring time to predict the water table levels is recommended. Within our municipality, any extraction will be in the Precambrian shield. Drilling is required and further guidance may be required to determine number and seasonal timing for monitoring.
2. It is not clear if and when water budget reports are required. Discretion could be given to all Crown pits/quarries and these reports should be mandatory for all new or expansion applications.
3. We fully support the requirement to ensure that local source water protection plans are protected and addressed within the submissions. In addition, we support that Natural Environmental Reports are to reflect current Provincial Plan requirements (e.g. PPS, Northern Growth Plan, etc.).
4. It would be appreciated if the MNRF notify a municipality when they receive requests to permit excavation on private lands or lands owned by a farm business. This will ensure the land use complies with the applicable municipal regulations (e.g. zoning by-laws) before the Ministry approves the activity or prior to the commencement of excavation or site preparation.

5. Finally, we agree with the proposed direction to streamline and reduce duplication when minor amendments are requested. Approved or amended plans should be sent to the municipality for their records.

Thank you again for the opportunity to provide our comments.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Bmorton'.

Beth Morton
Clerk/Administrator