

November 7, 2025

Hon. Mike Harris
Minister of Natural Resources
99 Wellesley Street west
Toronto, ON M7A 1W3

Minister Harris:

RE: Strada Aggregates Inc. Application to the Ministry of Natural Resources for a licence to operate a pit and quarry below the water table in the Township of Melancthon (ERO #: 025-1005).

The intent of this correspondence is to provide comments on the proposed aggregate development project by Strada Aggregates located in the area of 4th Line and County Rd. 17 in our neighboring municipality, the Township of Melancthon.

Strada Aggregates initially brought forward a presentation to Melancthon Council in October of 2021, which noted their intention to submit an application for a proposed quarry. The Strada Aggregates quarry was proposed to be constructed in an existing gravel pit and designed to extract 2 million tonnes of aggregate while extending below the water table.

Our comments are as follows:

- **Increased impact on traffic volumes.** Two of the major truck routes travelling east and then south, through the Township of Mulmur may experience increased truck traffic should the aggregate development proceed. These truck routes have rural profiles that don't have the infrastructure to support an increase in trucking volumes and safely accommodate all road users. Has the proponent completed any traffic impact studies? Are any of haul routes proposed to go through the road network in the Township of Mulmur.
- **Negative impact on groundwater and surface waters.** The proposed area for the aggregate development project is the headwaters of the Township of Mulmur's main rivers, the Pine River and Boyne River, and their corresponding creeks. Any surface run-off from the aggregate development project has the potential to increase the temperature of these water bodies negatively impacting cold water fish habitat. The Nottawasaga Conservation Authority (NVCA) does monitor temperature at 14 temperature monitoring locations throughout Mulmur.

Has the proponent undertaken any studies or proposed any future plans to monitor the impact of the surface run-off on area water bodies?

- **Concern with water quantity.** It is our understanding that Strada Aggregates Inc. plans to take 5,000,000 litres of water per day for a period of 10-years to support the aggregate operations proposed. This proposed amount of water to be taken is of immense concern to the Township of Mulmur given that Dufferin County currently experiences significant issues with water supply. With Strada Aggregates Inc. proposing to use 5,000,000 litres of water per day this will likely reduce the number of drinking water sources currently utilized to support residents throughout Dufferin County. In addition to that, the strong likelihood in the reduction of water source supply will force larger numbers of residents to be reliant upon a certain water source in Dufferin County. In the case where one of those water sources is contaminated, this will lead to a scenario whereby a vast number of residents are forced to drink lesser quality water, or, in extreme cases, undrinkable water. Has the proponent undertaken any studies related to water re-charge with the water shed?
- **Mitigation measures undertaken should quarry runoff contribute to deteriorating water quality in the Pine River sub watershed.** In the Pine River sub watershed, there are eight municipal wells providing drinking water to residents, including those in Mulmur. Results from existing Provincial Groundwater Monitoring, which are well monitored by the NVCA and the Ministry of Environment, Conservation and Parks, currently indicate that Ontario Drinking Quality Standards are being met¹. The municipal wells could be adversely impacted. Similarly, private wells for residential and agricultural use could be adversely impacted as well. Should it be determined that the proponent is contributing to poor water quality, what mitigation measures are they prepared to undertake?
- **Concern with long term impacts to natural heritage.** There are potential long-term impacts to the County's natural heritage system. The proposed quarry brings forth significant questions about whether the County's natural heritage features, specifically those related to water systems, will be protected and maintained at all. Will the proponent be required to contribute to restoration of natural heritage features as a condition of application approval.
- **Noise impacts.** With the aggregate development situated near the southwest corner of the Township of Mulmur, it would be expected that the volume of on-site equipment activity and truck traffic would increase significantly. Has the proponent conducted or is required to undertake any noise impact studies and will any noise mitigation measures be implemented.

¹ [Pine River Subwatershed- Health Check-2023](#), Nottawasaga Valley Conservation Authority. Accessed, August 5, 2025

- **Air quality impacts.** Increased traffic levels on unpaved roads near the proposed aggregate development project could result in additional road dust resulting in increased levels of particulate matter. Various studies² note the health effects of road dust. Will the proponent implement measures to monitor, control and mitigate road dust should the aggregate development move forward?
- **Third party review of Hydrogeological study.** One of the key comments that a community group technical expert made relates to the hydrogeologic study. It was brought forward that the data used to calibrate the simulation model has known biases, errors and gaps. These issues could potentially cause unreliable predictions of future flows, especially over the 40 plus year lifespan of a quarry. Will the proponent vet the hydrogeologic study with a third-party expert?

Based on the points noted above, the Township of Mulmur wants to emphasize our strong objection to Strada Aggregates Inc.'s submission to the Ministry of Natural Resources a licence to operate a pit and quarry below the water table in the Township of Melancthon. It is our belief that the approval of this licence for a pit and quarry below the water table will have detrimental impacts to resident health and safety, the quality of local water systems and air, noise levels, traffic as well as the long-term future of the county's natural heritage system. In light of these issues, we strongly urge the Ministry to reject the quarry licence application. To proceed would be to sacrifice the wellbeing of local residents for short-term economic gain. We expect the Ministry to act in the public interest and uphold its duty to protect air, land, natural heritage and water resources as well as collective quality of life.

Please provide documentation on how the development will address the concerns raised by the Township of Mulmur and provide evidence to confirm that the residents will not be adversely affected by the proposed operation.

We also request to be notified of all updates to ERO # 025-1005.

We look forward to your feedback on our submission.

Sincerely,

Tracey Atkinson

TOWNSHIP OF MULMUR
Tracey Atkinson
Chief Administrative Officer

² [Road dust and its effect on human health: a literature review](#), Khan. R and Strand M, Epidemiol Health, April 2018. Accessed August 19, 2025