



A People Place, A Change of Pace
SHELburne
ONTARIO, CANADA

November 6, 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).

On behalf of the Town of Shelburne, I am writing this letter to voice our objection to Strada Aggregates Inc.'s application for a licence to operate a pit and quarry below the water table in the Township of Melancthon, as it is presented today. While we understand the importance of aggregate resource extraction, Strada Aggregates Inc.'s proposal for aggregate extraction below the water table is concerning to both the short-and-long-term prosperity of Dufferin County.

General Comments

Our municipality is of the understanding that Strada Aggregates Inc. plans to undertake below the water table extractive measures from an area of approximately 100 hectares in size (the northern two-thirds of the site), with an annual tonnage condition of 2,000,000 tonnes. What must be clear is that the Town of Shelburne's concern does not centre around the mere action of operating a pit and quarry, but, rather, it is the practice of below the water table extraction where our municipality's concern arises. This practice can be detrimental to local water systems, natural environmental heritage systems, and create harmful environments for surrounding residents. Such outcomes, in our opinion, have a strong likelihood of having lasting impacts on the health and safety of both the surrounding area and also the broader County.

The Town of Shelburne understands that noise, vibration, and fumes are the unfortunate by-products of aggregate resource operations. While we can appreciate that no aggregate operation can eliminate any of the aforementioned by-products, it is our understanding that a below the water table operation greatly exacerbates those by-products. Local residents, therefore, will likely be subject to greater levels of noise, vibration, and noxious fumes, all factors that would



prove detrimental to their overall quality of life and general safety. In our opinion, the reduction in residents' health and safety should not be viewed as merely an unfortunate outcome of the quarry expansion, but, instead, current residents' health and safety should be a minimum standard required to be maintained.

Where the Town of Shelburne also has significant concern is with regards to the quality and quantity of water resources. 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 Town of Shelburne 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.

Of additional concern for the Town of Shelburne is in the potential long-term impacts to the County's natural heritage system. The County of Dufferin Official Plan, under section 5.1(a), explicitly states that *the County's objectives related to the protection and conservation of natural heritage and water resources include, protect, restore or where possible enhance natural resources, including surface and groundwater resources to provide safe drinking water, promote water conservation, and recognize the importance of the County as an important headwater area*. It is our belief that Strada Aggregates Inc.'s currently proposed licence will be in direct contradiction to this objective. In fact, 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.

Based on the above, the Town of Shelburne wants to once again emphasize our strong objection to Strada Aggregates Inc.'s submission to the Ministry of Natural Resources for 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 the long-term future of the County's natural heritage system. We will also request to be included on all updates relating to ERO #: 025-1005.



Direct Impacts to Shelburne

The Town of Shelburne is concerned about the impacts of the trucking operations that are proposed to be increased in volume utilizing the existing haul route specifically along County Road 124 (CR124). Within Shelburne, existing issues with the speed and volume of traffic, and in particular truck traffic, along CR124 will be exacerbated. It appears that no assessment has been undertaken to review the appropriateness of the haul route through the established and growing urban area of Shelburne. The proposal will increase heavy-truck traffic volumes in a community that is already unduly burdened by the related adverse effects of noise, vibration, dust, through traffic and speeding, negatively impacting the safety and comfort of pedestrians and cyclists and overall quality of life, while also constraining complete community development supported by complete streets that can accommodate all users.

Additionally, the submissions do not assess the impacts of trucking beyond the primary haul route; for example, the intersection of CR124 and Highway 10/89 in Shelburne – which is the busiest intersection in the community, and a major existing and developing commercial node – has not been assessed. Heavy trucks occupy more space within turning lanes and to make turns and maneuver through intersections, impacting the width and design of the intersection which in turn limits the ability for the intersection design to safely accommodate pedestrian crossings including the student walking routes which utilize this intersection for local schools. This intersection should be fully assessed to review its appropriateness as a haul route for the existing and proposed expanded trucking operations while accommodating and improving the safety of the intersection for pedestrians. The traffic study should assess all impacted intersections within the Town of Shelburne, including the intersection of CR124 and Wansbrough Way, CR124 and Highway 10/89 (and County Road 11) and Ojibway Road and Highway 10/89.

Further, existing conditions along CR124 in Shelburne are not suitable to accommodate both the trucking activities associated with the haul route and the urban roadway / complete street needs of Shelburne. Most of the existing CR124 roadway within Shelburne has a rural profile with no sidewalks (there is a new sidewalk along the east side of CR124 between Highway 10/89 and Anishinaabe Drive, but no sidewalks on the west side of CR124). The traffic study should assess the need to urbanize this roadway including barrier curbs, boulevards and multi-use pathways to support the proposed increase in trucking volumes and to safely accommodate all road users including pedestrians. The study should also revisit the appropriateness of the haul route and review alternatives which would avoid the need for trucking through the urban area of Shelburne.



Regarding groundwater impacts, the Town of Shelburne is currently moving through the process of permitting Well 7 & 8 (located in Melancthon) to run concurrently and the addition of a new Municipal Well No. 9. The Town's completed Water Supply Class EA recommends maximizing the flows from Well 5 & 6 with Arsenic Treatment which will modify the Wellhead Protection Areas for both of these well supplies. Additionally, the Town's completed Water Supply Class EA requires the addition of a new Well No. 10 which, based on the studies completed to date, would most likely be to the northwest of the Town of Shelburne outside of the existing Wellhead protection zones. The Town of Shelburne is concerned that the proposed extraction below the water table may impact the Town's plans for expanding and adapting its water system to accommodate planned growth and development.

The Town of Shelburne reserves that it may have additional comments as the submissions are reviewed further and new information emerges.

Respectfully submitted,

Denyse Morrissey

Denyse Morrissey, CAO

Cc: Dufferin County
Township of Amaranth
Township of East Garafraxa
Town of Grand Valley
Township of Melancthon
Town of Mono
Township of Mulmur
Town of Orangeville