Hello

In the attachment is a power point showing the risks of aggregates in Waterloo and what we need to see to help improve upon the Aggregate Act.

In my view, one of the fundamental issues increasing adverse impacts of aggregate quarries is regarding poor test times and methods used to establish baseline data. The tests are not standardized to reflect best management practices and as a result, it undermines risks. Improper bore hole depths, lack of spring thaw, improper testing of rare species and outdated data is common. We also have issues with Modflow programs that assume aquifers are simply self contained on site. There is a lack of regard for subsurface geology, sediment type and we need to incorporate Ground Penetrating Radar to properly view hydrological connectivity in outwash moraine systems.

Industry benefits with poor baseline data because it is difficult to prove causality when damages are done if we don't have good data. This is why it must be legislated instead of simply suggested. It's in the taxpayer's interest to make sure industry is accountable for their actions and that the public resources such as water supplies are reasonably protected for the long term.

If you were to review annual precipitation data in Waterloo Region in 2008 compared to 2011 you'll find polar opposite info. Overlap the two and it shows diamond patterns. In the age of Climate Change we need multi year models now because year to year with climate change we are witnessing annual shifts of flood years drought years. One year is wet, the next is dry, To prevent risk, we need proper study reflecting all possible variants.

Aggregates are a heavy water user and in Waterloo Region our water supplies are limited yet the province aspires us to grow beyond our natural carrying capacity. We cannot realistically plan for a pipeline to Lake Erie due to the fact contamination issues are increasing and it will likely be a non viable water supply in the not so distant future. Award winning economists such as Peter Victor have already warned of oil shortages coming in 2030-2040. The media and politicians for the most part buried their head on that issue but it does not negate what is actually happening. We cannot realistically hedge our bets on building a pipeline simply to squander the water supply we currently have for the sake of digging out the aggregates. You can't protect the water without protecting the dirt sand and gravel that holds it. We need to put firm restrictions on extraction in source water areas. There is no other way. It's the most cost effective and realistic way of protecting water supplies and the economic systems they support for the long term.

In Waterloo Region we are currently in the earliest issued level1 drought period on record. What happens when a mega quarry runs out of water? What happens when the taps downstream from the quarry dry up? We're already dealing with a level 1 drought with water volumes reflecting late August. We had no real spring thaw at all so where is our water going to come if not from the source itself?

Every aggregate proposal, every development must have regard for the protection and preservation of natural recharge, but if it is located in primary recharge, it must be prohibited.

I am an Ontario resident and taxpayer. I ask that the Government of Ontario, the Ministry of Natural Resources and the Standing Committee established to review the Aggregate Resources Act (ARA) amend the ARA to address the following values:

1. Make conservation of aggregate, a non-renewable resource, a priority over approval of new extraction sites. Conservation can occur through aggregate recycling and use of alternative materials.
2. Reserve virgin aggregate, a non-renewable resource, for use within Canada.

3. Prohibit aggregate extraction below the water table without a full Environmental Assessment and full understanding of the impact on all areas, near and far.

4. Prohibit aggregate extraction below the water table in drinking water source areas.

5. Develop a process and guidelines for identifying and designating new Specialty Crop Areas to safeguard unique agricultural land resources. Prohibit aggregate extraction in Specialty Crop Areas.

6. Conduct a thorough study of all existing aggregate reserves in Ontario. We cannot know what we need until we know what we have.

7. Develop an “Aggregate Master Plan” and disallow new aggregate mining licenses within the Niagara Escarpment Plan Area, Oak Ridges Moraine and Green Belt until the “Aggregate Master Plan” has been approved by the province.

8. Provide an assessment of the cumulative affects (dust, noise, air quality, traffic emissions; effects on water) of the “Aggregate Master Plan” on Ontario residents by district.

9. Require that new quarry proposals demonstrate the need for additional aggregate resource extraction in meeting the demands of the Ontario market.

10. Mandate that an Environmental Assessment occur for all new or expanding aggregate operations.

11. Realign the cost of virgin aggregate to reflect reality. Economically, aggregate is a low-priced, heavy-weight commodity that takes the bulk of its cost from transportation. Today, however, the price of virgin aggregate must include the activism necessary by residents to fight for their best interest despite the elected and public institutions designed to represent and protect the public interest. As well, the cost must encompass the environmental cost on residents. In other words the market cost for virgin aggregate is unrealistically cheap. Create a management system that works for residents and price the product accordingly.

12. Address what will happen to the operators of small aggregate resources if a mega-quarry becomes the sanctioned approach. What will small operators do when they are subjected to the monopolistic power of the goliath-like mega-quarry?

Until such time as the above noted issues are sufficiently addressed, I do not consider the ARA an up-to-date and relevant piece of legislation.

Sincerely,

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