



*The Corporation of*

**THE TOWNSHIP OF MELANCTHON**

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November 10, 2025

Mr. Greg Richards  
Strada Aggregates Inc.  
30 Floral Parkway  
Concord, ON  
L4K 4R1  
[ARAComments@stradaquarry.com](mailto:ARAComments@stradaquarry.com)

Integrated Aggregate Operations Section  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, ON  
K9J 3C7  
[ARAapprovals@ontario.ca](mailto:ARAapprovals@ontario.ca)

Dear Mr. Richards,

**Re: Proposed Strada Pit and Quarry – Class A, Below Water Pit and Quarry  
West Half of Lots 11 to 14, Concession 3 OS, Township of Melancthon, County of Dufferin  
(Licence No. 626676)**

On behalf of the Township of Melancthon I am writing this letter to formally provide the Township's objection to the recent Aggregate Resources Act (ARA) application that was submitted by Strada Aggregates Inc.

The Township has received Strada's submission in support of a Class A licence under the Aggregate Resources Act to permit below water table extraction on the site of Strada's currently licenced pits in the Township.

On initial review of the application and supporting studies, the Township has identified a number of areas of concern with the application. Please note that these concerns represent the results of the Township's initial review, and that the Township reserves

the right to identify further concerns, to provide more detail and to provide additional recommendations for the resolution of any concerns identified as the review of this application continues.

The Township has retained peer reviewers in the areas of hydrogeology, surface water, noise and vibration, blasting, air quality, agricultural impact, natural heritage and land use planning. With respect to transportation impacts, the Township relies on review undertaken by the County of Dufferin.

The Township's peer review process is ongoing. The Township is committed to working through that process with Strada to continue to identify, scope, mitigate and potentially resolve concerns to the extent possible.

Areas of outstanding concern include:

**The potential effects of the proposed pit and quarry on the natural environment have not been adequately addressed**

1. Characterization of natural heritage features and functions on and in the vicinity of the subject lands is insufficient;
2. Field data in support of the natural heritage assessment is insufficient, incomplete and/or out of date;
3. No assessment of bat maternity habitat has been undertaken;
4. Proposed impacts to species at risk and other natural features are unclear and incomplete. The timing between impacts and their associated mitigation are absent from the report. For example, habitat removal is proposed for Eastern Meadowlark; however, when the removal is proposed to occur (e.g., part of site prep to initiate Phase 1?) and when and how this impact will be mitigated (e.g., decades later during progressive rehabilitation measures) are not provided.
5. The assessment of impacts to natural heritage features and functions is incomplete;
6. Little to no ecological rationale has been provided to support conclusions regarding ecological impacts;
7. Monitoring and mitigation measures recommended to address natural heritage impacts are insufficient;
8. Natural heritage policy discussions and concluding statements have not been included; there is no acknowledgement whether or how conformity with Township or County official plans and consistency with the Provincial Planning Statement have been met.

**The potential effects of the proposed pit and quarry on ground and surface water resources, including headwaters streams and private wells, have not been adequately addressed**

1. There is insufficient analysis to determine whether overburden and bedrock groundwater are hydraulically connected across the site;
2. Conclusions regarding the perched nature of surface water features do not appear to be supported by the stratigraphy of the site;

3. Only a limited amount of the available data has been used to support transient modeling scenarios for the site;
4. Insufficient detail and analysis has been provided regarding the proposed groundwater inflow control barriers and their design, construction and function;
5. Insufficient detail is provided to demonstrate the mechanism and/or feasibility of rerouting water throughout the site for mitigation purposes;
6. Insufficient detail is provided regarding the feasibility of other mitigation measures, including injection wells;
7. The potential for heaving of the unexcavated aquitard layer has not been addressed;
8. The application has the potential to impact groundwater quality, including bedrock aquifers utilized by private water supply wells, both during operations and post-rehabilitation;
9. There appears to be a lack of consistency between predicted reductions in stream inflow and monthly surface water budgets;
10. Insufficient assessment has been provided of the potential for groundwater mounding to impact private effluent leaching beds;
11. Proposed water resources monitoring and mitigation measures are not sufficient to identify or address potential impacts;

**The potential effects of the proposed pit and quarry on nearby residents and communities have not been appropriately addressed**

1. No safety analysis has been completed as part of the transportation study;
2. The noise and air quality studies have failed to consider potential contribution of recycling activities, storage piles and other factors.
3. The noise and air quality studies have failed to properly consider the cumulative impact of the proposed quarry alongside nearby licensed aggregate operations;
4. The potential impacts on nearby agricultural lands and operations, including specialty crop areas have not been adequately assessed;
5. The broader potential effects of the proposed quarry on human health have not been assessed;
6. Insufficient analysis and recommendations have been provided to address blasting impacts, including potential flyrock impacts;

**The suitability of the progressive and final rehabilitation plans for the site have not been adequately addressed**

1. Insufficient detail has been provided on long-term and/or post-rehabilitation mitigation and management measures that may be required;
2. Insufficient consideration has been provided of the long-term impacts of different rehabilitation scenarios;

**Planning and land use considerations require further assessment**

1. Amendments to the Township Official Plan and Zoning By-law are required prior to the Licence being issued. In this context, a variety of land use planning

considerations must be addressed, including consistency with the Provincial Planning Statement, the County Official Plan and the Township Official Plan;

### **Other matters that are appropriate to address**

1. The financial impacts of the proposal for the Township have not been adequately addressed. The net financial impact to the Township cannot be estimated based on the information provided;
2. Insufficient information has been provided regarding the quality and quantity of the available aggregate resource on the subject lands;

### **Conclusion**

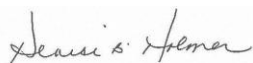
Given the volume and technical detail of the material provided in support of this application, the Township and its peer review team have not had sufficient time to fully analyze and assess the potential impacts of the quarry as proposed. The Township therefore reserves the right to raise further issues and make further recommendations as its review progresses.

The Township and its peer review team look forward to engaging with the proponent through the review process alongside the County and other agency and municipal partners.

The Township requests notification of any further meetings or updates on the review of this file.

For further questions and correspondence, please contact Denise B. Holmes, CAO/Clerk ([dholmes@melanctontownship.ca](mailto:dholmes@melanctontownship.ca), 519-925-5525 ext. 101).

Yours truly,



Denise B. Holmes, AMCT  
CAO/Clerk