November 4, 2019

Sent via email to: aggregates@ontario.ca

Andrew MacDonald
Natural Resources Conservation Policy Branch
300 Water Street
Peterborough, ON
K9J 8M5

Re: Bill 132, Better for People, Smarter for Business Act, 2019

Dear Mr. MacDonald,

Donnelly Law ("we" or "the Firm") represents the Skeleton Lake Cottagers
Organization ("SLCO"), an incorporated group of residents concerned about
quarry activity in the Township of Muskoka Lakes.

The Skeleton Lake Cottagers Organization is concerned about the process the
province is following for the proposed amendments to the Aggregate Resources
Act ("ARA") and associated regulations for the following reasons:

(i)   there are no specific details that allow SLCO to understand and
comment on changes to the ARA that may impact its members.
Many members of SLCO have properties on Skeleton Lake and
their enjoyment of the lake could be negatively affected by
activities related to aggregates extraction;

(ii)   the time frame for comments on this Environmental Registry of
Ontario posting is short; and

(iii)   there are no details as to when members of the public will be
given another opportunity to comment or the length of time that
will be provided to respond to specific changes to the ARA or the
associated regulations.

SLCO requests that:

(i) the wording "within the water table" be clarified (e.g. below the water table, above the water table);

(ii) when the Province proposes specific amendments to both the ARA and the associated regulations, the comment period be a minimum of 90 days to enable a determination of the impacts on SLCO and its members; and

(iii) the issue of the preferred haul route is a very serious consideration in the Township of Muskoka Lakes due to the potentially high volume of truck traffic associated with aggregate operations, interactions with local traffic, tourists and school busses, as well as the potential for road damage due to the heavy usage. Based on previous applications in the Township, implementation of a preferred haul route often requires new road network improvements (e.g. enhanced intersection control, turning lanes, etc.), road improvements (e.g. reconstruction of a road segment) and land acquisitions. (road widenings). It would be highly prejudicial to local municipalities if they are prevented going forward from imposing conditions on aggregate producers and that any future haul route agreements can be voluntary only.

SLCO supports changes to the ARA and regulations related to:

(i) strengthening the protection of water resources for extraction within the water table as part of a more robust application process for existing operations;

(ii) increasing public engagement for applications that may impact water resources;

(iii) enhancing reporting on rehabilitation; and,

(iv) reviewing the notification and consultation requirements for new applications.

SLCO supports the Township of Muskoka Lake's decision to deny the Lippa *Planning Act* applications for a 200,000 t/annum pit and quarry for up to 80 years of extraction (16,000,000 tonnes total) (the "Application"). On June 16, 2017, Muskoka Lakes Council unanimously voted to deny Mr. Lippa's Application. On June 26, 2017, the Township of Huntsville voted to support

the decision of Muskoka Lakes. The MNRF is reviewing the associated *Aggregate Resources Act* application.

Of great concern to SLCO is the potential impact of a new quarry on water quality, natural heritage features, traffic safety, and noise and dust. In addition, SLCO is concerned about the impacts of the quarry on a potentially significant cultural heritage landscape (Skeleton Lake watershed).

Please do not hesitate to contact me at 416-572-0464, or by email at david@donnellylaw.ca, cc'ing alexandra@donnellylaw.ca and morgan@donnellylaw.ca should you have any questions or comments concerning this correspondence.

Yours Truly,

David R. Donnelly

Cc: Client