



October 4, 2017

Ala Boyd  
Ministry of Natural Resources and Forestry  
Policy Division  
Natural Resources Conservation Policy Branch  
300 Water Street  
Peterborough, Ontario  
K9J 3C7

**Re: Criteria, methods, and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe.**

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Dear Ms. Boyd:

### **Introduction**

OSSGA is a not-for-profit association representing over 280 sand, gravel and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the majority of the 164 million tonnes of aggregate consumed, on average, annually in the province to build and maintain Ontario's infrastructure needs. OSSGA works in partnership with government and the public to promote a safe and competitive aggregate industry contributing to the creation of complete communities in the province.

We appreciate the opportunity to provide comments on the draft natural heritage mapping as part of the review of the Provincial Plans. OSSGA has provided numerous comments through the plan review process along with attending open houses and stakeholder meetings. While we remain very concerned about the policies related to aggregates in the natural heritage system in the Growth Plan and Greenbelt we will focus on our concerns with mapping for this submission.

### **Summary of Key Points**

In a previous submission to Ministers Kathryn McGarry and Bill Mauro (June 11, 2017) OSSGA expressed our concerns with how the natural heritage system would potentially be mapped. In that letter we stated that, "in preparing this mapping the Province should closely examine the overlap with selected bedrock resource areas and primary and secondary sand and gravel deposits. Areas where an aggregate deposit is predominantly cleared land or contains limited on-site environmental features should be excluded from the Natural Heritage System. Otherwise, sites that should be made available to supply the aggregate needs of the Growth Plan may not be considered by the industry due to the restrictive policy framework of the Natural Heritage System."



OSSGA continues to believe that priority should be given to areas of high quality resources in the Growth Plan area. It is vital that the province take steps to ensure provincially significant high quality aggregate resource areas are protected for future use.

In addition, OSSGA believes that all licensed aggregate sites in the province should be excluded from inclusion in the natural heritage system mapping. Sites that have already been licensed through the MNRF are subject to extraction under the ARA and as a result should be excluded from the Growth Plan natural heritage system. Including licensed sites in the natural heritage system jeopardizes the long term ecological goals of the plan and is a misleading to the public.

It is important that the mapping reflect existing licences and we are requesting that all licences be removed from inclusion in the natural heritage system.

Should you have any questions please do not hesitate to contact me.

Respectfully Submitted,  
**Ontario Stone, Sand & Gravel Association (OSSGA)**

A handwritten signature in blue ink, appearing to read "Norman Cheesman", with a large, stylized flourish at the end.

Norman Cheesman  
Executive Director