Ontario Growth Secretariat

Ministry of Municipal Affairs and Housing

777 Bay Street

23rd Floor, Suite 2304

Toronto, ON M7A 2J3

Tuesday, July 28, 2020

Dear Sir or Madam:

**Re: Proposed Changes to the Greater Golden Horseshoe Growth Plan – ERO# 019-1680**

Thank you for the opportunity to provide comments on ERO # 019-1680 regarding proposed amendments to the Growth Plan. Rice Group is an integrated land development company that operates an extraction pit at 22481 Kennedy Road, Queensville, Ontario. We also a member of the Ontario, Stone, Sand & Gravel Association (OSSGA) and support OSSGA’s comments on ERO#019-1680 regarding the proposed amendment to the Growth Plan.

We recently commissioned a consultant team to pursue a new extraction license that will leverage our current extraction assets and provide future certainty for a “close to market” supply. We will do everything we can to be part of the growth and success of the Province as it relates to a dependable aggregate supply chain.

As noted by the Province in ERO # 019-1680 the proposed amendments to the Growth Plan are to increase economic activity and ensuring adequate aggregate resources are available is critical to achieving the successful implementation of the Growth Plan. The growth envisioned by the Growth Plan will require 2.5 billion tonnes of aggregate in the GGH over the next 25 years, of which 1.5 billion tonnes is needed in the GTA. Currently, there is a proven gap between consumption rate of aggregates and the rate of licensing replacement reserves in key market areas such as the GTA. For example, in 1992, the GTA imported 40% of its aggregate needs and now this has increased to over 70 %. It is evident that new supply of close to market resources is needed and the Province’s proposed revision to Section 4.2.8 is critical to ensure new aggregate resources can be made available while still ensuring protection of endangered and threatened species in accordance with the Endangered Species Act (PPS, 2.17). In accordance with the Endangered Species Act, habitat is only permitted to be removed when it is demonstrated that the development will result in an overall benefit to the species.

This change is also important to restore confidence in investing in the application process since almost all new aggregate sites in the GGH contain habitat of endangered and threatened species as a result of the 171 species listed by the Province and how habitat is defined which results in large areas being mapped.

Thank you for consideration of our comments.

Yours truly,



Anson Lê

Vice President, Aggregates

Rice Group