

December 12, 2020

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Mr. Greg Sweetnam
James Dick Construction Limited
14442 Regional Road 50
P.O. Box 470
Bolton, ON L7E 5T4

Ms. Krystle Dinunzio
Ministry of Natural Resources and Forestry
(Integrated Aggregate Operations Section)
300 Water Street, 4th Floor South,
Peterborough, ON K9J 3C7

Subject: James Dick Construction Limited (JDCL) - Application for a Category 1 and 2 Class A Licence (the “Licence”) under the Aggregate Resources Act; Part Lot 7, Concession 2, Township of Nassagaweya in the Town of Milton in the Region of Halton (the “Application”) - Notice of Objector Response

Dear Mr. Sweetnam and Ms. Dinunzio,

I have read JDCL’s Notice of “Objector Response – *Aggregate Resources Act*” dated November 19, 2020 (the “**Notice**”), and I am writing to reconfirm my objection to the above-referenced Application.

JDCL describes its attempts to resolve objections as an outcome from the consultation process. I have not been consulted by JDCL, other than to receive this latest Notice. Had I been consulted, I would have submitted the words of Premier Doug Ford in my submission, “When the people don’t want something, you don’t do it. No one wants it, I don’t want it. We’re going to make sure it doesn’t happen, one way or another.”

As a community member, I am concerned the public has not been permitted to participate in meetings between JDCL and the Joint Agency Review Team (“**JART**”). I do not have the benefit of any of those discussions, and object to being now asked to accept revised technical reports at face value. The responses provided to me by JDCL are too general to be of any use. My ongoing concerns include, but are not limited to:

1. Impairment of water quality and quantity: JDCL states that it has successfully used untested underwater blasting technique at its’ Guelph quarry. I understand JDCL breached the aquitard at the Guelph quarry, which was the subject of a lawsuit. How can JDCL guarantee that similar damage to the water supply will not occur? Why weren’t we informed of this failure? At the LPAT hearing for the Hidden Quarry in Wellington County, JDCL admitted that the underwater blasting in Guelph was only under 4m of water. JDCL has never done under water blasting or rock removal from under 30m of water, which is proposed with this Application. JDCL’s Water Well Interference Complaint Response Procedure puts the onus on JDCL to “prove alleged water well impacts are not caused by the quarry”. That is too late, any negative impact on the water supply or quality is unacceptable. Such Procedure and guarantee that “water supplies are fully protected” are of zero value if the water is impacted. JDCL’s assertion that “quarrying is a clean operation and water in quarry ponds generally meets drinking water objectives for all chemical parameters” is of concern. First, JDCL has provided little information on the proposed recycling process, which appears to allow storage of material within 2 meters above the water table. Secondly, “generally” meeting drinking water objectives means that “sometimes the water is contaminated”. JDCL must demonstrate how the groundwater will not become contaminated by surface water beside the recycling facility.

2. WHPA: Modelling the flow of groundwater is not an exact science. Contrary to JDCL’s response, a 2018 Halton Region map includes the site in the Wellhead Protection Area, and it is within a highly vulnerable aquifer.

3. Unacceptable impacts on residents’ health caused by an increase in small particle dust in the air: An in- depth health study, approved by the Halton Region Medical Officer of Health, is needed to evaluate the potential effects on local residents from fine (less than 2.5 micrometers) particulate matter released from all aspects of site operations. Any adverse health effects caused by reduced air quality from the proposed site is not acceptable. Quarrying so close to residents raises very serious human health concerns, as confirmed by ACTIONMilton’s expert air quality scientist.

4. Planning and Land Use: OPA 31 has been approved by Halton Region. The Application is not for the “re-instatement” of an old licence, which was for a sand and gravel pit in the 70’s. JDCL misconstrues the nature of the Application. The property is no longer appropriate for aggregate extraction of any kind, especially an underwater quarry. It is in the middle of a vastly different residential and business community, into which many have invested their life savings. It is not suitable or approved for

recycling operations. The property is part of the Greenbelt, and has re-naturalized itself over the last 20 plus years and should be turned into a conservation area for all to enjoy.

5. Haul routes: JDCL has not adequately addressed what will happen with the 16 trucks per hour leaving the site during rush hour. A comprehensive transportation study is needed which includes more than Reid Sideroad and the Guelph Line/Hwy 401 interchanges, but ALL local roads and the 401 as gravel trucks impact merging traffic. Any truck traffic on rural or residential side roads, even for "local deliveries" will be an unacceptable safety risk. This area has changed significantly since the quarry was licensed originally, with so many more road users relying on our roads, including cyclists and pedestrians. This is not an appropriate haul route.

6. EMS response times: JDCL's response ignores that the shoulders on Reid Sideroad are not designed to take the weight of aggregate trucks. The fine network of alternate routes is not an answer. Delays could cost lives by slowing Emergency Medical Services vehicles reaching their destination.

7. Uncertainties regarding impacts of blasting, excavation and extraction: I am not satisfied with the statement that JDCL is very familiar with the geology of the Amable formation. A full peer review of JDCL's blast impact report, including more detailed information on the nature of the Amabel Formation on-site is required.

8. Uncertainties regarding flyrock: Residential/commercial buildings, Highway 401 and CP and Guelph Junction rail lines are within flyrock range. The risk of and damage from a potential flyrock event must be assessed; rather than being dismissed, as it currently is, as an issue. To state that "Fly rock is not allowed to leave the quarry property" does not remove the risk or take into account any operational errors that result in fly rock. The minimum setback to roadways is only 30m and to a property boundary is 15m. The Concerned Residents Coalition in Rockwood provided expert evidence 500m is the appropriate setback, based on a widely accepted standard <http://sg.crcrockwood.org/wp-content/uploads/2019/03/Flyrock-FAQ-True-and-False.pdf>

9. Potential damage to home from blasting operations: JDCL assures us that, "Vibration and noise from blasting may be noticeable but should not be a sufficient concern to residents living in Campbellville given the Ministry limits that have to be satisfied". Insufficient evidence has been provided to support this statement, and to conclude that "it should not be a sufficient concern" is not acceptable.

10. Negative impact of additional noise: Further acoustic shielding has been added to mitigate noise. This addition acknowledges that the quarry will be louder than the Hwy 401 noise. The noise study must be updated to include tone and pitch of the noise as well as the sound level. The 401 provides a monotone background din; versus the jarring sounds from rock crushing and handling, trucks reversing. The noise will be a health risk to the community.

11. Negative impact on some property values: For many their home is part of their retirement fund. The negative impact on property values is substantiated in many reports, and is not acceptable. OPA 31 does not approve the subject land for aggregate extraction. The OPA 31 community consultation process was supposed to put an end to the widely unpopular and incompatible idea of putting a new quarry in the middle of Campbellville.

• **My additional comments:**

I attend the community meetings held by Association of Citizens Together in Our Nassagaweya (ACTION) and have read what they have circulated as their experts and consultants assess the impact of the proposed quarry on the community. I support the work of ACTION and authorize them to raise additional issues on my behalf. For the above reasons, and those outlined in my original objection letter, I reconfirm that I maintain my objection to the Application. I ask the MNRF to recommend to Minister Yakabuski to refuse to issue JDCL the Licence requested.

Signature _____ Printed Name _____

Street: _____ Town: _____ ON, Postal Code: _____ Email Address: _____