



## ENVIRONMENTAL | DEFENCE

317 Adelaide Street West Suite 705 • Toronto Ontario Canada • M5V 1P9 • tel: 416.323.9521 fax: 416.323.9301 • [www.environmentaldefence.ca](http://www.environmentaldefence.ca)

May 19, 2009

MNR Guelph District Office  
1 Stone Road West  
Guelph, ON  
N1G 4Y2

St Marys Cement Inc. (Canada)  
55 Industrial Street, 4<sup>th</sup> Floor  
Toronto, ON  
M4G 3W9

[MNRFOA@ontario.ca](mailto:MNRFOA@ontario.ca)

[communityinfo@stmaryscbm.com](mailto:communityinfo@stmaryscbm.com)

Dear Sir/Madam,

Re: St Marys Cement ARA license application

I am writing this letter to convey my support to the Friends of Rural Communities and the Environment (FORCE) community case with respect to the St Marys Cement proposed aggregate development in the Northeast Flamborough portion of the amalgamated City of Hamilton.

Environmental Defence has 25 years of experience engaging and collaborating with government bodies, NGO's and individuals to effect change where it is needed most. Our unique campaign style and credible track record has repeatedly proven successful.

Environmental Defence objects to the Aggregate Resources Act (ARA) license application filed by St Marys Cement for many reasons. This proposed massive limestone quarry is the first Greenfield quarry application subject to the Greenbelt Plan. The land is zoned for Agriculture and Conservation Management, not Industrial Mineral Extraction. The site falls within the Natural Heritage System of the Greenbelt and the Wellhead Protection and recharge areas for the Carlisle groundwater-based municipal system - the latter still being studied as part of source protection planning in Halton-Hamilton under the *Clean Water Act*.

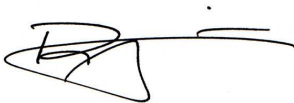
Other objections include, but are not limited to, the significant risk of adverse impacts to:

- Hydrogeology, including effects on municipal, communal and private wells
- Hydrology, including creeks and streams that are part of the Bronte Creek watershed
- Natural features, including Provincially Significant Wetland complexes, significant woodlands, species at risk and their habitats
- Agriculture, including the permanent loss of agricultural lands
- Air quality
- Social and economic effects on the community, and
- Public health.

The Ministry of the Environment has rejected the data underpinning the company's characterization of the aquifer and baseline conditions. The mitigation system proposed is unproven, with successful long term performance in similar settings and climate, and it has not been tested, evaluated and demonstrated to be viable on the site. The Adaptive Management Plan is undefined and proposed in the absence of sound understanding of the site and a proven engineering solution to mitigation.

Please do not hesitate to contact me should you wish to discuss this further.

Regards,

A handwritten signature in black ink, appearing to be 'Rick Smith', with a horizontal line extending to the right.

Rick Smith, Ph.D.  
Executive Director

Cc: FORCE ([info@stopthequarry.ca](mailto:info@stopthequarry.ca))