

Diane Schwier - Aggregate Inspector  
Ministry of Natural Resources  
Field Services Division - Southern Region  
Guelph District Office  
1 Stone Road West  
Guelph ON N1G 4Y2  
(519) 826-4930

Dear Ms. Schwier,

I am writing to object to the notice for an application for a License under the Aggregate Resources Act by St Marys Cement Inc. to establish the St Marys Cement Flamborough quarry, as described in EBR posting # 010-6227

My objections fall into four categories:

- **Unacceptable Impacts on the Water Supply and Water Quality**

The only source of water for Carlisle, Campbellville, Kilbride and surrounding rural communities is groundwater. Hundreds of private wells for homes, an elementary school, farms and businesses rely on this aquifer, as does the village of Carlisle's municipal water system which serves some 3,000 people. *The City of Hamilton Groundwater Resources and Wellhead Protection Study* showed that the proposed quarry site falls within the significant recharge and Well-head Protection Area (WHPA) of the Carlisle municipal water system, within a two year time of travel. The proponent's own technical experts admitted that, without mitigation, the impacts of quarry dewatering on our water supply would be unacceptable in documents submitted to the City of Hamilton. Using computer modelling based on questionable assumptions about the nature of the aquifer and data discredited by the Ministry of the Environment, St Marys Cement now suggests it will have limited impact and it has proposed a mitigation system and vague adaptive management plan, that is theoretical, unproven, and potentially threatens water quantity, quality and safety. St Marys Cement planned to test its original unproven Groundwater Recirculation mitigation System (GRS), but suspended all work after the Ministry of the Environment rejected its preliminary results as unsatisfactory. To date, no mitigation system, of any type, has been tested and evaluated for effectiveness on the site. The proponent cannot offer a viable plan for the protection of our drinking water. Our community lies within the Greenbelt, which prohibits new lake-based water systems. We have no potential supply of potable water other than our aquifer, no "Plan B". The new *Clean Water Act* promises precautionary protection for our drinking water at its source, which must take precedence over this proposed quarry.

- **Destruction of the Natural Environment in Our Greenbelt**

The proposed quarry site falls within the Natural Heritage System of Ontario's Greenbelt, an area of highest environmental value. There are Provincially Significant Wetlands, significant woodlands, meadows, and streams on the site, home to abundant wildlife. Huge open pit quarries consider these natural heritage features as "overburden"- they remove everything in the area of excavation, destroying habitat and changing the temperature and chemistry of the wetlands and streams. This site includes an undisturbed forest core that is part of an extensive network of continuously interconnected forest corridors, stretching far beyond the limits of the proposed quarry. The quarry would adversely impact this entire ecological network by interfering with its interconnectivity. We are asked to trust an unproven mitigation system to protect this jewel.

- **No Safe or Acceptable Haul Route**

No haul route identified by St Marys Cement provides direct access to the 400 series highways, and all pass along country roads. These roads are used by local residents, school buses and emergency vehicles to get to jobs, to schools, to and from agricultural operations, to local businesses, to friends, and

to community activities. To carry the projected 1,100 quarry truck trips per day, these narrow, winding roads would have to be widened, flattened and straightened, encroaching into the surrounding environmentally sensitive and/or heavily settled lands. There will be health issues from truck emissions, especially as idling trucks line up at the quarry gate in the early morning, and the noise from passing trucks will be disruptive. There will be extended delays at existing busy railway crossings. There is no agreement on who would pay for the capital costs and maintenance of the expanded roads, or how private lands adjacent to the roads would be acquired for such expansion. Worst of all, *de facto* convoys of heavy trucks will create unacceptable traffic safety risks for the cars, school buses, farm vehicles, pedestrians, cyclists, and equestrians that presently use these roads. One accident will be too many.

- **Harm to the Community**

Our community includes over 200 homes in established subdivisions and rural lots abutting the proposed quarry site, two elementary schools one concession away, and the villages and rural residents of Carlisle, Kilbride and Campbellville. Many citizens will be exposed to the noise, dust, blasting, exhaust emissions and safety risks created by a major quarrying operation. The beautiful and peaceful rural environment will be degraded, and local real estate values and the municipal tax base will suffer. Farm land will be permanently lost. This loss reduces the critical mass of farms and can result in less equipment and feed suppliers, veterinarians, and other supports to farms. Dust, noise, emissions, trucks, and water impacts will affect the remaining farms' crops and livestock, farmers, and farm workers. The land for the proposed quarry is presently zoned for agriculture and conservation management. The City of Hamilton has not approved changes to the Official Plan or zoning for the property.

St Marys Cement has not been a good neighbour. It dug boreholes in local roads without obtaining proper permits, has not tested its mitigation system although it promised us in writing that it would do so, and has not finished hydrogeological and transportation studies promised to the City and to the MOE. We fear that such disrespect to our community will continue. This proposed quarry is not compatible with local residents and current land uses. The impact on the public good will be unacceptable.

For all these reasons, I object to the approval of the Aggregate License of the proposed Flamborough quarry. I support the work of Friends of Rural Communities and the Environment (FORCE) on behalf of my community, and I ask the government agencies that are involved in the decision to consider my community's objections and to refuse this license.

Yours sincerely,

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(Name)

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(Street Address)

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(Town, Province)

(Postal Code)