

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

To: St Marys Cement Inc. (Canada)
55 Industrial Street, 4th Floor
Toronto, ON M4G 3W9

Email: MNRFQA@ontario.ca

Email: communityinfo@stmaryscbm.com

Dear Sir/Madam,

I am writing this objection in response to the notice regarding the application for a Category 2, Class A License by St Marys Cement Inc. to excavate aggregate from a proposed quarry located on parts of Lots 1, 2 and 3 of Concession 11 and 1869 Milborough Line, in the former Township of Flamborough, part of the City of Hamilton. Please accept the following as some of the reasons for my objection:

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

The only source of water in this area (communities such as Campbellville, Carlisle, and Kilbride as well as the surrounding rural areas) is groundwater. Hundreds of private wells for homes, a public elementary school, and neighbouring farms and businesses rely on it. The Carlisle municipal system which serves some 3,000 people relies on it, and this system has a history of water quantity and quality issues.

The proposed quarry site falls within the significant recharge and Well-head Protection Areas (WHPA) for the Carlisle system according to studies prepared for the City of Hamilton and the Halton-Hamilton Source Protection Committee. St Marys Cement's own technical experts submitted reports to the City of Hamilton which stated that the impacts of quarry dewatering on our communities would be unacceptable.

The Ministry of the Environment (MOE) found the data collected from the company's summer 2008 and fall 2004 pump tests to be unacceptable. In October 2008, MOE requested that the company redo its testing to better understand the aquifer and develop improved baseline data. St Marys Cement refused to do this work in January 2009. Since the company would not redo the baseline pump tests, the MOE has not allowed testing of the Groundwater Recirculation System (GRS) the company planned to use to manage the quarry's unacceptable impacts. As of the writing of this letter, this disagreement has not yet been resolved. This is a concern for several reasons. First, St Marys Cement's hydro-geology materials included with its license application rely on computer modelling, with data and assumptions about the aquifer that have been discredited by MOE. Also, the company's conclusions differ significantly from existing governmental and source protection committee results. Second, the original GRS proposed by St Marys Cement was theoretical and unproven and now, as of this date, no mitigation system, of any type, has been tested on the site or evaluated for effectiveness. Finally, the proposed unproven mitigation system is being supported by an adaptive management plan to address any issues that may arise. This adaptive plan includes no details and no contingency should it fail. This state of affairs leaves our communities exposed.

The new *Clean Water Act* promises protection for our drinking water right at its source. The law promises to prevent problems before they happen. The Greenbelt Plan prohibits extending lake-based water systems to our communities. If something goes wrong, there is no Plan B for our drinking water. The proponent has not and cannot offer a viable plan for protection of our drinking water. Protection of our water must be the first priority and take precedence over a proposed quarry.

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

This is a beautiful area. There are forests, meadows, and streams. And, because these habitats exist, we have brook and brown trout, songbirds, owls, hawks and other raptors, white tailed deer, coyotes, butterflies, dragonflies, frogs and salamanders, among other creatures. We have flora like the butternut. Quarries and the huge open pit mines they create are destructive. They remove everything in the extraction area – the soil, the plants and the trees, and they change the temperature and chemistry of the streams. Habitats are permanently lost.

The proposed site falls completely within the Natural Heritage System of Ontario's Greenbelt, an area of the highest environmental value. Provincially significant wetlands, significant woodlands, and other nationally, provincially, regionally and municipally designated natural features and species at risk, or their habitats, are present on and around the site. The quarry would impact all of them and how they connect to one another. St Marys Cement's license application documents tell us they concede these features are present but they want us to believe that the

unproven mitigation system and undefined adaptive management plan will take care of everything. Protecting the diversity of species here and maintaining natural corridors and connectivity is very important. There are few remaining areas in Southern Ontario which have this combination of natural attributes. Blasting, dust, noise, vibrations, lights, fuelling and maintenance, and trucking would also negatively affect the environment. The destruction from an open pit mine would be permanent.

- **No acceptable Haul Routes and Public Safety at Risk**

Our country roads are narrow, winding and beautiful. They are used by the people who live here to get to work, to schools, to and from agricultural operations, to local businesses, to friends, and to community sports and activities. They are also used by emergency vehicles. None of the haul routes identified by St Marys Cement provides direct access to 400 series highways. The roads themselves would have to be changed forever, expanding into the surrounding environmentally sensitive lands, further destroying this pristine area. And, there is no agreement on who would pay for the capital and ongoing maintenance.

More than 1,100 truck trips per day would cause significant problems for the existing users of these roads and the proposed route(s) will cause the impact of the quarry to be felt well beyond the quarry site. There will be health issues from truck emissions, especially as trucks line up at the quarry gate. The noise from trucks, especially the empty ones, is a concern and one not dealt with in the application documents. There will be extended delays at the existing railway crossings. Finally, one truck every 30 seconds, and worse yet, convoys of large trucks will create safety risks for cars, school buses, farm vehicles, pedestrians, cyclists, and horseback riders. One accident is too many.

- **Permanent Loss of Farm Land**

Growing / raising and buying local food is important to all of us. This part of Halton and Hamilton is an active farming area. The quarry would permanently remove farm land from production on the site and would affect other farms in the area. These farms could be affected by water impacts, dust, noise, truck traffic on the same roads used by farm hands and equipment. A quarry will change the nature of business in the area. When farms disappear, so do the services that support farms – equipment dealerships, feed mills, agricultural supplies stores, and veterinarians. As a result the remaining farmers then find the business of farming becomes more difficult than it already is. The Greenbelt is supposed to protect farm land.

- **The Land is not Zoned for Mineral Extraction under the Official Plan, this proposed use is Incompatible**

The land for the proposed quarry is zoned for agriculture and conservation management, not for mineral extraction by an industrial company. The City of Hamilton has not approved any changes to the Official Plan or Zoning for the property. St Marys Cement has not been a good neighbour. It dug boreholes in the roads without the proper permits. It did not test any mitigation system on the site even though it promised in newsletters that it would. It has not finished transportation and water studies for the City and other local municipalities, or for the MOE. The quarry is not compatible with the local villages, hundreds of houses on rural concessions, the schools and daycares, or with farms and other businesses. It would affect our real estate values and municipal tax base. The impact on our lives and community would be too much.

I object to the approval of the proposed Flamborough quarry for the reasons noted above. I also support the work of FORCE, on behalf of our community, and I ask the government agencies who are involved in the decision to consider the community's objections and to refuse the license.

Yours sincerely,

(Name)

(Street Address)

(Town, Province)

(Postal Code)