

July 3, 2007

Stan Holiday  
Senior Planner – Legislative Approvals  
City of Hamilton  
71 Main Street West  
7<sup>th</sup> Floor  
HAMILTON, Ontario  
L8P 4Y5



Post-Event Feedback re: St Marys Haul Route Public Information Centre: June 21<sup>st</sup>, 2007, part of proposed aggregate development application OPA-04-17 and ZAC-04-89

Dear Stan,

As you know, we wrote to you on June 18, 2007 on behalf of our communities with comments regarding the then proposed St Marys Haul Route Public Information Centre (PIC), planned for June 21, 2007, and the issues relating to its compliance with the CART proposed Quarry Haul Route Evaluation Terms of Reference in the areas of public notice content and mechanisms; PIC format; location, timing and logistics; and lack of background/preparatory information. We also included recommendations for best practices regarding public engagement. We stand by those comments but also feel that it would be helpful to provide you with key points of view on the community's post-event feedback.

Upon reviewing the Terms of Reference and participating in the event, the overwhelming conclusion remains that the event fell well short of the *minimum* requirements presented in the Terms of Reference. Below please find some additional points for consideration:

- **Identification** – St Marys representatives and their technical and PR consultants were not clearly identified to the public with name tags or other identifying markers.
- **Meeting Focus** – The transportation focus of the meeting was diluted by the extent of information boards on other subjects {hydrogeology, proposed mitigation system, dolostone bedrock, natural features, and noise mitigation (unrelated to haul route noise levels)}, their proximity to the transportation boards, and their similar colouring/format. While these issues are clearly of real interest and concern to the community, the layout of the material did not facilitate the meeting's prime purpose: transportation. Further, relevant inputs and underlying assumptions such as final proposed annual extraction tonnages, hours of operation, truck traffic projections and mix, were not even available upon questioning. The information board material itself was overly simplistic and not substantiated on board or in hand-out materials.
- **Meeting Format** – The lack of scheduled presentation time ensured that the community did not receive the same common information and opportunity to ask and learn from clarifying questions of benefit to all.
- **Community Concerns and the Preliminary Problem Statement** – Some community concerns have been listed but not even all previously identified concerns have been documented in the preliminary problem statement and the concerns have been simplified to their "lowest common denominator". No information boards listed, spoke to or provided context and detail to the community issues.

- **Preliminary Assessment of Alternative Transport Modes** – Meaningful analysis of need and alternatives, specifically rail, appears to have been summarily dismissed with adoption of a from quarry to destination by truck method “by far the most common method of aggregate transportation...”. Impacts from this trucking option are not fully delineated and the impacts are understated relative to those claimed to limit effectiveness of the other options. This would not appear to meet the level of scrutiny required under the *Environmental Assessment Act*.
- **Preliminary Delineation of the Exclusion Zone** – No draft or final evaluation criterion or methodology approach have been presented, commented, or decided upon that would permit excluding zones from the study area at this stage. The three “factors” considered for the delineation of a primary exclusion zone are not comprehensive, compared to the suggested evaluation areas in the Terms of Reference, would not permit thorough consideration of alternatives as per environmental assessment, nor have they even been consistently applied. It is certainly fair to wonder how the Rural Settlement Areas of Carlisle and Kilbride warrant differential treatment from that of Campbellville in light of the residential, retail and community activities cited. Further, the Terms of Reference, section 4.0, specifically called on the *proponent to demonstrate why some travel directions would not be used, or that the volume of traffic would be so low...so as to not result in any appreciable effects...then routes in these directions would not need to be assessed*. St Marys did document estimated percentages of aggregate volume flow which clearly showed that traffic in sizeable volumes could be expected to flow in all directions from the proposed facility. As a result of the preliminary delineation, St Marys has, in effect, arbitrarily removed some 75% of the proposed study area requested by CART. This has been done despite the reality that these areas contain existing designated truck routes (such as Centre and Carlisle Roads), traffic light access to nearby highways and major arterials, and that truck traffic could still access these routes in spite of St Marys truck route policy which relies on municipal by-law enforcement. As communities, we are obviously concerned about any proposed haul routes through our communal hubs, as well as through the local roads and concessions, that network to them. We do believe, however, that a proposed haul route evaluation study, when undertaken, should meet the highest standards on evaluation of alternatives and identification of proponent preferred routes.

In summation, we reiterate that the work done by the CART group in preparing the Terms of Reference for the Study, in both substance and process, should be respected.

We have provided this material electronically in pdf form and ask that it be provided to the CART members to be considered as an input as part of the application review process for the proposed St Marys Cement CBM application OPA-04-17 and ZAC-04-89.

Respectfully submitted,



Graham Flint BAsC, P. Eng  
Chair & Spokesperson

copy via Email to: [sholiday@hamilton.ca](mailto:sholiday@hamilton.ca)