Hello,

I am a new resident to East Garafraxa and would like to voice my concerns with the proposed Tri-County Pit. I understand there is a council meeting slated for July 24th. I will attend with my husband. The notes below are the concerns we have identified for the proposed pit. I would appreciate confirmation these items have been put on the record. In addition, as it is a week from the meeting, if there is opportunity to discuss any or all of the concerns, I would be most appreciative.

I look forward to meeting with council and discussing my concerns.

Kind Regards.

Lidia and Andrew Fenech

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Tri-County Pit Proposal and Resident Concerns

Items of Concerns Summarized:

1. It is stated the Social, Environment and Safety impacts studies have been done, however sufficient emphasis on the local resident expectations has not yet been met, or evidenced based on the report provided.

2. Within the report, it is unclear if any conflict of interest has been declared by any of the consultants brought in for the report.

3. The safety impact for children getting off and off school buses on Dufferin County Road 3 has not been assessed and will need further study, during work hours of operation.

4. As per the bylaw and early start time, the gravel pit and stone crushing is being treated as a “construction site”. Gravel pits are mining as per Ministry of Labour and should be treated as such. Early start time should be revoked. Based on the report, the hours of operations are expected to be 0700h to 1900h; however these are not in adherence.
5. There is a duty on the corporation of the town to enforce the by-laws without exception. It is essential to know who is enforcing, and the expected outcomes for non-adherence. What is the penalty?

6. Traffic plan conducted was not complete and does not account for traffic flow in all directions, nor on the entire haul route i.e., Dufferin County Road 3 is not included. In particular east and west over a blind hill does not permit the line of site for more than 400 feet of distance travelled. The use of soft shoulders is a great concern.

7. Noise pollution and resident’s concern for noise and the lack of enforcement to the reported decibel levels.

8. Issue of Natural resourced where water shed is being used for industrial services to the amount of 23Mil gallons is a significant daily utilization. Based on the report, the ability to use this volume of water is only based on outdated data with limited on site inspection during various weather conditions. This area is the source of the water table.

9. If there are any deviations from the proposed plan, who is accountable for: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions.

10. Require the need for additional studies to fully understand the proposed pit management:
   a. Traffic Studies, E to W, W to E, N to S and S to W. On SR 17 as well as CR3
   b. Traffic Studies, to be done during hours of operation, propose 0600 to 2000h, this ensures load times and return times are captured, and during weekdays
   c. Traffic study to assess time from SR17 and CR3 turn onto CR3 optimal time to reach optimal speed and use of soft shoulder
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   h. Traffic study to assess trucks adhering to the speed limits on CR3, E to W and W to E.
   i. Traffic Study to assess for the need for a traffic light at SR17 and CR3 intersection
   j. Soil and water shed studies to be conducted when the ground is not frozen (see pictures in the report)
   k. Water Studies to determine if irrigation equipment is actually used and not during frozen ground in November.

Report Questions and observed need for further clarifications:
6.1 Surface Water

• Confirm when this study was conducted?
• Confirm if any new studies were conducted?
• Confirm the qualifications of the reader of data?
• Define “best fit”.
• Were only historical and graphic reviews of area done?
• Were any on site visits conducted outside of Nov. 23, 2013 during frozen ground?
• Was there an ability to truly assess the water flow at this time?
• Were only assumptions made to assess the flow?
• Current measurements are using manual and data logger measurement and manual stream flow. What is the current industry standard to collect these data?
• The instruments used, are they calibrated? What is the frequency of calibration? What is the industry accepted standard deviation for assessing the water levels?
• This report also indicated streamflow is limited July to October, yet these are the months expected for the majority of the washing stations to be used, where would the water come from? The proposed 8,771,000 LPD?

10. Proposed site Plan

l. Extraction was expected, however the processing of concrete will require additional resources (water) and infrastructure (inbound and exiting the facility following wash). Study to assess for these is not fully understood, propose the concrete washing should be included in the assessments for watershed, in addition to the excavation

m. Washing of concrete is expected over the drought months, as indicated in the report. Who is accountable to monitor the water levels, who is responsible to report deviations from water levels, how will they be mitigated, what penalties exist for first and multiple infractions? Who is responsible and accountable to the area residents for reduced water in local wells? How will they be replenished?

11. Traffic

a. Confirm when the actual study was conducted? Define “complete” traffic assessment? Define what is the Level of Service B for the intersection? At what point is there are need to change the LOS? Who will monitor it? Who will enforce it at the appropriate time? Define “peak hours” as per report.

b. It was identified as above; the study may have been flawed and limited in its scope. It should also include CR3

c. Structural improvements are needed on SR17 per report, when will they be implemented? Was CR3 considered in the report? Is CR3 able to sustain the weights of the on and off highway trucks?
d. Is there any monitoring of the production amounts with respect to the use of the roads? Who will monitor the production, who will determine if they are within acceptable limits, who will enforce the production amounts, how will overproduction and use of the road be managed?

e. It was noted “no parking on SR17”. Is this being monitored and enforced?

f. It is noted resurfacing of the road is needed, when will this occur? Have future changes to haul loads been factored into the current levels.

12.1 Air Quality

The report only appears to extend to the Pit site. An air quality study for the truck route is required to ensure residents (receptors) are not adversely affected by dust from the pit mining as well as the hauling, use of the heavy trucks for transport has not been assessed. The Air quality study should be conducted on SR17 as well CR3. Also, “fugitive dust” was mentioned in the report, is there a mitigation plan for minimization of this, and who will enforce this. If there is an adverse effect with the “fugitive dust, or air quality” in general as a direct result of the Pit work, who is accountable, and responsible to address these potential issues should they arise.

12.2 Acoustic Environment

The report indicates the expected decibel levels for operation between 0700h to 1900h. Who will be: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions.

12.3 Water Management

Please clarify: Who will be: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. Who will enforce the mitigation and monitoring plan?

W4. Who determines the point of interference, and who implements the mitigation options. Will the bedrock well be within the actual water table as indicated in the report? Will the plan be to fill Shaws Creek from the water table? How is that feasible if the Pit is to be 1.5 m above the high water table? Who monitors the height above the water table? What if this is not adhered to? Who is accountable and responsible to residences if water is affecting the local wells adversely?

W5. Is annual monitoring in summary sufficient given the volumes of water and trucking expected? Who will be: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6-Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring plan?

13.2 Provincial Policy Statement – 2014

Confirm that designs and buffering to mitigate potential adverse effect and minimize risks for public health and safety are in place.

Confirm if any subsequent impact studies beyond 2014, on social economic or environmental issues will be conducted or planned?

Have mitigation plans been put in place for heritage areas in the event of an impact or accident directly related to mining?
13.4 GreenBelt Plan – 2005

Define and clarify groundwater and recharge plan.

After 2005 have any updates to GP been done, reassessing and ensuring for enforcement of the need for groundwater recharge. Will the recharge be the same quality of water, safe and life sustaining for plant and humans? Who will oversee this is adhered to?

13.5 Ontario Provincial Standards – 1997

This is a Category 3 plan. Define and confirm if any changes have been made since 1997 and what are the criteria to change to a different category? Who determines the need to change to a different category, and what process in place to ensure the appropriate measures are in place to remain at the same category, or to change categories? Who will oversee this?

13.7 East Garafraxa Plan – Local

Commitments to the Haul Route were proposed. Have adjacent roads been assessed for the haul route, namely CR3? Additional study will need to be undertaken to ensure traffic control, safety and road improvements, shared with other operators and adhered to by TriCounty Pit as well. Who will ensure these are overseen and monitored accordingly. Who will be responsible should deviations occur?

13.9 Conclusion

It represents good planning is indicated. However a number of factors remain outstanding. The haul route is now deemed “established” without the merit of actual study of affected roads, SR 17 & CR3. The traffic changes have not been assessed to fully understand all aspects of the route proposed. The changes to public safety and increased risk, namely children, have not been fully understood. The changes to air quality and increased noise levels as well as perceived speed on CR3 by Pit Vehicles, needs to be further assessed for compliance. The improvements and enhancement timelines are not clear. They appear to be required for road maintenance; however no timelines are established, or indicated to manage the existing current traffic and the proposed increase in volume of trucks.

Surficial Report:

The onsite assessment for this report was conducted on Nov. 26, 2013, during the winter months, with snow on the ground and had to “pick” to get a soil sample.

This is not reflective of the current situation.

Only Historical Data (dated from 1964 to 2013) were used to assess for the water drainage.

Please define “Best Fit” as it relates to this situation. How can we base the reality of the water situation based on old data and not using actual onsite assessments at critical times?

Irrigation equipment is not used in the winter; hence an assumption is made to its use.

The conclusions in this report appear to be flawed as there is no drainage in the winter with frozen ground.
3.8 Topsoil and subsoil

Soil stripping procedures rely on changes in soil horizon colours to alert the equipment operators that they have found the boundary between the different layers. Confirm the operator’s qualifications. What is the scientific or industry standard to know the boundaries between levels has been reached? Is this approach acceptable? Should we accept this arbitrary and subjective approach? How will it be determined the depths are within acceptable limits to the water table? Who will monitor and enforce adherence?

3.9 Rehabilitation

Has it been determined what will be done to rehabilitate the area? Is it return to agricultural land? What measures are in place to ensure it is rehabilitated to the plan, and who oversees if any amendments or changes are to be made?

Water Impact Study

The report repeated indicates the mining will occur 1.5M above the high water table. Who will be: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6-Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring?

3.7 Existing Permit to take Water (PTTW)

Who will monitor for the water? 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6-Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring? Who will be accountable and responsible to the local residents for water well issues, and what are proposed resolutions and timelines?

4.1 Borehole Drilling.

Who is calibrating the equipment? Frequency of calibration? Experience level of the operator? What is the expected standard deviation for the monitoring, and is there a backup system in place should it fail to monitor?

4.2 Water Level Monitoring

Have any recent studies been conducted since 2013? Will ongoing studies be done during production to ensure adequate water levels exist for Shaws Creek, the water table and the local residents?

4.4 StreamFlow

It has been observed there is a lack of water flow in the summer, and freezing in winter, hence unable to test adequately. Using the manual flow, area velocity method, is this industry standard, is it widely
accepted? What is the accuracy of the method vs. actual measurement? What is the acceptable standard deviation and was that met? Was the method vs. actual measurement conducted?

5.3 Groundwater - Surficial water Interaction

Has an assessment of impact of discharge from the farm to the creek during production been assessed?

Define and clarify the flow of creek water and groundwater during each season and the impact to wetlands, from slit to wash areas.

5.4 Groundwater – flow System

Who controls the till unity, why is till used? Who determines the till levels to be used, and when to implement? What is the impact to the residents and the local wells? Who oversees the till unit? Who oversees any needed mitigation?

5.5 Regional Considerations

Is there evidence to support the claims made? Were Alton Residents made aware of the potential impact to their water?

6.0 Extraction

How will the 1.5m above water table be adhered to? What is the impact if they drill into the water table? Who is accountable and responsible for issues?

Has any study been done to confirm return of water to Shaw’s Creek is possible? How will this be done?

What is the impact to the residents not only to the wetlands and the natural environment?

June to Nov the washing station is planned to run 5.5 days, during the low water period, as per the report. Where will the extra water be derived from? Impact to existing wells for residents? Where are silt ponds coming from?

Study to determine ground water use, by GreenWood 2 sites, 14MLPD, and 1 smaller site TriCounty is slated for 9MLPD, and the impact to groundwater, monitoring of the water use and adherence to the volumes permitted.

7.2 Water Taking and Impacts

The report indicates 8,771,962LPD for washing activities. There is no other mention of concrete activities for this water. Silt and settling pond is noted to be in the water table however the report repeatedly indicates up to 1.5m above water table is to be accessed. This is discrepant. The impact to the water table, local area residents and local wells will need to be assessed.

The report discusses “presumed” conditions, predictive impact, ‘best guess’. It is imperative that actual studies be conducted PRIOR to any approval of new pits. The effects to the local area residents has not been fully realized, nor assessed.

Monitoring and Mitigation plan appears inadequate for the potential deviations due to a lack of full oversight. More details are needed to fully understand the measures in place to ensure public safety, child safety, air safety, noise level concerns, and water issues as a direct result of the proximity to the drill site and the haul routes.

9.0 Conclusion
It is important to know who will be accountable to oversee the deviations to the plan, fully vet and gain resident approval of the plan prior to the beginning of the dig, and continuously assess the impact of the pit to the local area. Anything less will be considered negligent on the part of the corporation.

Beacon – Screen and Natural Environment Assessment:
Who will: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6- Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring? Who will be accountable and responsible to restore natural environment, and what are proposed resolutions and timelines?

Archaeological Assessment:
Who will: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6- Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring? Who will be accountable and responsible to manage the archeological finds, and what are proposed resolutions and timelines?

Traffic Impact Study
Assessed SR17 and up to CR3 intersection. There is no evidence to support study conducted on CR3 with additional residents, children, and potential safety concerns.

The assessment was conducted at CR3 and SR 17 intersection, and GW pit on October 13, 2014. The volumes recorded per the report did not capture the typical operations that would be experienced in the peak summer months. Additional trips were ‘added’ to account for the existing and proposed use. The calculations are ‘assumed’. Concrete recycling increased the operations by 10%

Growth Rate
The study did not take into account the new religious centre that will increase the traffic and potential residential numbers.

8.1 Sight Distance
The TAC guide for stopping distance, is that for a regular vehicle or is that using a truck under load? The stopping distance may vary due to these conditions. Also the use of the soft shoulder is not included here. Is it an expectation that trucks use the soft shoulder to continue to gain speed up and over the hill just past SR17?

8.4 Truck Acceleration Lane
The report does not account for the extended soft shoulder use up to and over the hill. This is a concern for residents, trucks attempting to accelerate to their optimal speed under a load, and potential for child safety issues, during the school season.
This section is flawed and will need additional study and assessment to be truly reflective of the existing situation.

Are there any documented subsequent studies, and issues to be brought to the table as a direct result of the traffic questions?

**Air Quality Assessment**

The report only references air quality as it relates to the Pit itself. Confirm if there are any planned studies that will provide insights into surrounding area air quality? Also, dust and particulates from the soft shoulder use will need to be evaluated. Lastly, noise pollution on CR 3 will need to be done as well, ideally not modeling data, however actual data on site. This report appears to use modeling data, rather than actual data.

The mitigation plan for dust control is the use of water. Is this in addition to or is the volume of water already calculated into the plan?

**Noise Control Study**

The noise study appears to assess the noise solely within the pit. The noise from the existing and proposed increased truck traffic on CR3 has not been assessed, as no noise levels from the trucks have been conducted.

Respectfully, we request additional studies, taking into account the safety concerns for children, environmental concerns; the need for realistic, real-time data is need to make informed decisions about the proposed pit.
Items of Concerns Summarized:

1. It is stated the Social, Environment and Safety impacts studies have been done, however sufficient emphasis on the local resident expectations has not yet been met, or evidenced based on the report provided.
2. Within the report, it is unclear if any conflict of interest has been declared by any of the consultants brought in for the report.
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Study to determine ground water use, by GreenWood 2 sites, 14MLPD, and 1 smaller site TriCounty is slated for 9MLPD, and the impact to groundwater, monitoring of the water use and adherence to the volumes permitted.

7.2 Water Taking and Impacts
The report indicates 8,771,962LPD for washing activities. There is no other mention of concrete activities for this water. Silt and settling pond is noted to be in the water table however the report repeatedly indicates up to 1.5m above water table is to be accessed.
This is discrepant. The impact to the water table, local area residents and local wells will need to be assessed.
The report discusses “presumed” conditions, predictive impact, ‘best guess’. It is imperative that actual studies be conducted PRIOR to any approval of new pits. The effects to the local area residents has not been fully realized, nor assessed.
Monitoring and Mitigation plan appears inadequate for the potential deviations due to a lack of full oversight. More details are needed to fully understand the measures in place to ensure public safety, child safety, air safety, noise level concerns, and water issues as a direct result of the proximity to the drill site and the haul routes.
9.0 Conclusion
It is important to know who will be accountable to oversee the deviations to the plan, fully vet and gain resident approval of the plan prior to the beginning of the dig, and continuously assess the impact of the pit to the local area. Anything less will be considered negligent on the part of the corporation

Beacon – Screen and Natural Environment Assessment:
Who will: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6-Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring? Who will be accountable and responsible to restore natural environment, and what are proposed resolutions and timelines?

Archaeological Assessment:
Who will: 1-monitoring for adherence, 2-establish frequency of monitoring, 3-enforcement, 4-penalties for non-compliance and 5-adherence post penalty and consequences for multiple infractions. 6-Experience level of person overseeing monitoring? What qualifications are industry standard? Who will enforce the mitigation and monitoring? Who will be accountable and responsible to manage the archeological finds, and what are proposed resolutions and timelines?

Traffic Impact Study
Assessed SR17 and up to CR3 intersection. There is no evidence to support study conducted on CR3 with additional residents, children, and potential safety concerns.
The assessment was conducted at CR3 and SR 17 intersection, and GW pit on October 13, 2014. The volumes recorded per the report did not capture the typical operations that would be experienced in the peak summer months. Additional trips were ‘added’ to account for the existing and proposed use. The calculations are ‘assumed’. Concrete recycling increased the operations by 10%
The study did not take into account the new religious centre that will increase the traffic and potential residential numbers.

8.1 Sight Distance
The TAC guide for stopping distance, is that for a regular vehicle or is that using a truck under load? The stopping distance may vary due to these conditions. Also the use of the soft shoulder is not included here. Is it an expectation that trucks use the soft shoulder to continue to gain speed up and over the hill just past SR17?

8.4 Truck Acceleration Lane
The report does not account for the extended soft shoulder use up to and over the hill. This is a concern for residents, trucks attempting to accelerate to their optimal speed under a load, and potential for child safety issues, during the school season. This section is flawed and will need additional study and assessment to be truly reflective of the existing situation.

Are there any documented subsequent studies, and issues to be brought to the table as a direct result of the traffic questions?

Air Quality Assessment
The report only references air quality as it relates to the Pit itself. Confirm if there are any planned studies that will provide insights into surrounding area air quality? Also, dust and particulates from the soft shoulder use will need to be evaluated. Lastly, noise pollution on CR 3 will need to be done as well, ideally not modeling data, however actual data on site. This report appears to use modeling data, rather than actual data. The mitigation plan for dust control is the use of water. Is this in addition to or is the volume of water already calculated into the plan?

Noise Control Study
The noise study appears to assess the noise solely within the pit. The noise from the existing and proposed increased truck traffic on CR3 has not been assessed, as no noise levels from the trucks have been conducted.

Respectfully, we request additional studies, taking into account the safety concerns for children, environmental concerns; the need for realistic, real-time data is need to make informed decisions about the proposed pit.