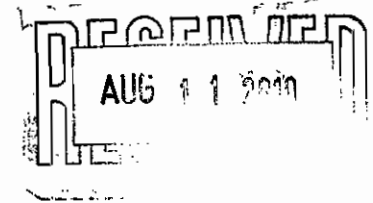


August 6, 2010



KAREN JACKSON  
585189 EMG #  
COUNTY RD #17  
RR#2 SHELBURNE ONT. L0N 1S6

AUG 06 2010

Attention  
Mayor Fawcett and Council

I am writing in regards to the application submitted by Strada on (Part of the West Half of Lots 11& 12 Concession 3 O.S) we live on the only double sided lot adjacent to the proposed pit. As our council members are voted in by the people of your community I feel we are being misread by Strada as being compliant and simple - I was in attendance at the last council meeting July 22/10 at this time the council was asked to advertise with Dufferin for several thousand dollars for the greater Melanchthon. Tell me what are you advertising a township which consists of Gravel Pits and Wind turbines? This is our land a natural, sensitive and quiet countryside why not advertises it as that. Tell me who would want to move into this area? Or why visit?

Strada sees this land in dollar value *only* what they can profit from and leave for us to mend once the land has been raped of what it can provide.

\*\*There are two large ponds and a vast wet land in the area that are deemed to be a gravel pit -I have seen several geese, ducks and herrings nesting in the area - I have watched deer graze with there young and fox, wolf and coyote hunt, wild turkey's roam, bunnies populate and butterflies thrive in the milk weed.

This will all dramatically change, it already has begun - trees have been uprooted wells are drilled and the land scraped down to the soil.

I can't even speculate what will happen to our water source. Because I am so close to the suppose pit we will be the first of many to suffer water loss or contamination.

We have been asked to send in our objections by September 7<sup>th</sup> well I object and I think council should take a stand on our behalf and on behalf of our children and our grandchildren this is why you were elected.

Regards,  
Karen Jackson

SEP 23 2010

Denise Holmes, AMCT

---

**From:** Steve and Marni from Baker Magic Shows.com [abra@bellnet.ca]  
**Sent:** Tuesday, August 31, 2010 8:32 PM  
**To:** Denise Holmes, Melancthon Township  
**Cc:** mpietrolungo@strada-aggregates.com; diane.schwier@ontario.ca  
**Subject:** Objection letter to Strada Application in Melancthon

**Re: Objection to Strada Application for a new Pit in the Township of Melancthon**

**August 31, 2010**

**To whom it may concern at:**

**Strada Aggregates, Melancthon Council, and the MNR,**

**I am writing to object to the application that has been made by Strada Aggregates Inc. for a Category 3, Class "A" License to excavate aggregate from a pit of 47.6 hectares, located in: Part of the West Half of Lots 11 and 12, Concession 3 O.S. Township of Melancthon, County of Dufferin. I do not believe that Strada should be given permission to expand operations with a new pit when they have not shown good corporate citizenship on the Melancthon lands where they currently conduct business. My objections are as follows:**

**1) Strada's April 20, 2010 report contains a factual error: It commenced operations in the spring of 2004, with estimated reserves of about 9 million tonnes. "Approximately 500,000 tonnes remain as a result of high demand in this area." In fact Strada advised at the public meeting that it has taken approximately 500,000 tonnes per year out of this pit, for an approximate total of aggregate removed of 3 million tonnes, which would leave approximately 6 million tonnes in the existing pit. a) Why would such an error appear in Strada's report only to be refuted the minute ratepayers suggest that Strada must then owe the Township more in levies? b) Will Strada be amending this report to reflect the true amount of aggregate remaining in the existing pit? c) If so what is the urgent need for expansion? d) Full and factual disclosure of all**

9/7/2010

SEP 23 2010

**aggregate removed by Strada as well as all levies paid to Melancthon since 2004 must be publically presented.**

**2) Melancthon Township should have a By law Enforcement Officer monitoring the Strada pit 24/7 and available for public complaints. Will Strada pay for this officer?**

**3) Melancthon rate payers, who are close "neighbours" to Strada have long standing complaints that Strada employees continued crushing / extraction operations past their specified closing time of 5PM weekdays and express concern that Strada is in non-compliance of requirements □to mitigate noise and dust relating to their operations by measures taken on sight□ as specified as part of their application for license. This must be rectified permanently.**

**4) By removing the trees and moving their berm eastward in August 2010, Strada has in fact amplified both noise and dust from their operations without any mitigation; neighbours find this "irritating and frustrating due to disruption of sleep at 6AM weekdays plus impaired air quality from the dust". This must be rectified permanently.**

**5) I object to Strada's expansion of their operations outside the parameters of their original permit by allowing a cement batching operation to be set up on their property possibly taking more water than Strada was permitted to take. Such a violation was noted in 2009.**

**6) It appears that Strada must have been in contravention of their licence when the storage of wind turbines was allowed on their property prior to installation. This should not happen again.**

**7) Bluewater Geosciences May 17th letter to Melancthon Council re: Strada, advices that there was "an exceedence of permitted water taking allowances" as well as "the detection of petroleum hydrocarbons present in the well", they also stated that issues raised received "no action" by Strada and that "Strada's consultants continue to make assumptions based on the inadequate monitoring network". At the August information meeting Strada waved off these accusations as "unfair" and "inaccurate" and said that Bluewater would now agree with them. a) Ratepayers are not happy with this inadequate explanation and**

**expect full public disclosure on Bluewater's findings and why hydrogeologist Brett Lemieux would change his assessment. b)This needs to be done in an open public forum with Strada.**

**Thank you,**

**Marni Walsh**

**Box 36,**

**R.R. 5 Dundalk, Ontario**

**NOC 1B0**

**519-923-9998**

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<http://www.eset.com>

**Denise Holmes, AMCT**

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**From:** Steve and Marni from Baker Magic Shows.com [abra@bellnet.ca]  
**Sent:** Wednesday, September 01, 2010 8:45 AM  
**To:** Denise Holmes, Melancthon Township  
**Subject:** Fw: Council Objection letter to Strada for OPA and ZBA

Hi Denise, Please confirm this was received. Thanks! Marni

**Re: Council Objection to Strada Application for OPA 17 and ZBA in Melancthon**

**August 31, 2010**

**Melancthon Council,**

**I am writing to object to the application for an OPA and ZBA that has been made by Strada Aggregates Inc. for a Category 3, Class □A□ License to excavate aggregate from a pit of 47.6 hectares, located in: Part of the West Half of Lots 11 and 12, Concession 3 O.S. Township of Melancthon, County of Dufferin. I do not believe that Strada should be given these amendments to expand operations with a new pit when they have not shown good corporate citizenship on the Melancthon lands where they currently conduct business. My objections are as follows:**

**1) Site plans for the new pit run down hill into wetlands with questionable mitigation. ( only a 100 foot buffer zone) Noise and pollution will destroy this natural habitat for birds and other wildlife.**

**2) Currently there are only 3 full time local employees and the levies do not pay for the upkeep of local roads damaged by Strada truck traffic. Therefore, I see no economic benefit for our township to allow this new pit.**

**3) Continuing to allow aggregate expansion on Melancthon farmland does not fit with the "vision" of an agricultural community.**

**4) Strada's April 20, 2010 report contains a factual error: It commenced operations in the spring of 2004, with estimated reserves of about 9 million tonnes. "Approximately 500,000 tonnes remain as a result of high demand in this area." In fact Strada advised at the public meeting that it has taken approximately 500,000 tonnes per year out of this pit, for an approximate total of aggregate removed of 3 million tonnes,**

9/7/2010

SEP 23 2010

which would leave approximately 6 million tonnes in the existing pit. a) Why would such an error appear in Strada's report only to be refuted the minute ratepayers suggest that Strada must then owe the Township more in levies? b) Council must demand Strada amend this report to reflect the true amount of aggregate remaining in the existing pit c) With so much aggregate left what is the urgent need for expansion? d) Melancthon Township Council must demand full and factual disclosure of all aggregate removed by Strada as well as all levies paid to Melancthon since 2004 must be publically presented.

5) Melancthon Township should have a By law Enforcement Officer monitoring the Strada pit 24/7 and available for public complaints. Will Melancthon insist that Strada pay for this officer whether an expansion is allowed or not?

6) Melancthon rate payers, who are close "neighbours" to Strada have long standing complaints that Strada employees continued crushing / extraction operations past their specified closing time of 5PM weekdays and express concern that Strada is in non-compliance of requirements  to mitigate noise and dust relating to their operations by measures taken on sight  as specified as part of their application for license. This must be rectified permanently.

7) By removing the trees and moving their berm eastward in August 2010, Strada has in fact amplified both noise and dust from their operations without any mitigation; neighbours find this "irritating and frustrating due to disruption of sleep at 6AM weekdays plus impaired air quality from the dust". This must be rectified permanently.

8) I object to Strada's expansion of their operations outside the parameters of their original permit by allowing a cement batching operation to be set up on their property possibly taking more water than Strada was permitted to take. Such a violation was noted in 2009. Pits must have constant monitoring by a Township employee at the proponents expense.

9) It appears that Strada must have been in contravention of their licence when the storage of wind turbines was allowed on their property prior to installation. This should not happen again. Will they be fined?

10) Bluewater Geosciences May 17th letter to Melancthon Council re: Strada, advices that there was "an exceedence of permitted water taking allowances" as well as "the detection of petroleum hydrocarbons present in the well", they also stated that issues raised received "no action" by Strada and that "Strada's consultants continue to make assumptions based on the inadequate monitoring network". At the August information meeting Strada waved off these accusations as "unfair" and "inaccurate" and said that

**Bluewater Geosciences would now agree with them. a) Ratepayers are not happy with this inadequate explanation and expect full public disclosure on Bluewater's findings and why hydrogeologist Brett Lemieux would change his assessment. b) This needs to be done in an open public forum with Strada.**

**Thank you,**

**Marni Walsh**

**Box 36,**

**R.R. 5 Dundalk, Ontario**

**NOC 1B0**

**519-923-9998**

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<http://www.eset.com>

Sept 2, 2010

Mr. Craig Lang  
Ontario Ministry of Natural Resources  
Midhurst District Office  
2284 Nursery Road  
Midhurst, Ontario, L0L 1X0

Ms Diane Schwier  
Ontario Ministry of Natural Resources  
#1 Stone Road West  
Guelph, Ontario, N1G 4Y2

Strada Aggregates Inc.  
Mr. Mario Pietrolungo  
30 Floral Parkway,  
Concord, Ontario, L4K 4R1

Ms. D. Fawcett  
Mayor of Melancthon Township  
RR#6 Shelburne Ontario  
L0N 1S9

Dear Sirs and Madams:

I wish to submit my objection to the application for a license to extract gravel by Strada Aggregates Inc on the West Part Lots 11 and 12, Con 3 OS Melancthon for the following reasons:

(1). In Part 2 section 2.2.3 of the Planning Report and ARA Summary Statement by MHBC Planning, dated April, 2010, they state:

"Dufferin County is a primary selected sand and gravel resource area. Within the Township of Melancthon, there are five Primary Resource Areas. The proposed Melancthon Pit is located within Resource Area 3. Much of the resource is described in the ARIP as, "...medium grained sand with some gravel and pebbly sand...suitable for a range of applications...selection and sand control is required for most crushed stone products". (ARIP 163)"

In their application they state that they have a plan in place to mitigate noise and dust, but they do not specify how they plan to mitigate the dust or control the sand.

The prevailing winds come from the West; I live to the East of the present aggregate extraction pit on Lot 13 C3 OS Melancthon. Strada is doing nothing to mitigate the dust from that pit, which blows directly in my front door and windows.

When I questioned Mario Pietrolungo, Strada's representative, at Strada's Open House in August, 2010, he referred me to another gentleman, who works for their planner, who said: "I don't know, I am only the noise consultant".

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They all but admitted they had no dust mitigation plan or if they did nobody was aware of it

The dust from Strada's present Aggregate Pit on West Part Lot 13 Con 3OS has an effect on the air quality. With the operation of another pit next door, it would be unbearable.

MNR has a dust mitigation program, but as they do not seem to be aware of it at either the existing pit on Lot 13 or the application for a new pit on Lots 11 and 12.

On this basis, I object to Strada's Pit Application.

(2). In Part 2 section 2.1 of the Planning Report and ARA Summary Statement by MHBC Planning, dated April, 2010, they state *Strada's Shelburne pit ... commenced operation in the spring of 2004, with estimated reserves of 9 Million tonnes. Approx 500,000 tonnes remain as a result of high demand in the area.* Thus they wish to open another pit to the South to mix with the remaining low-grade residue.

Part 2 section 2.2 Shelburne Pit States:

*Strada's existing Shelburne Pit is 41 hectare (101 acre) in area and is legally described as the West Half of Lot 13, Concession 3, O.S. The Shelburne Pit was licensed in 2004. The annual production limit is 1.25 million tonnes. Development has included paved and landscaped entrance and berms, scale house, full permitting, wash plant capabilities, and a portable concrete batching plant.*

The Draft Plan Amendment application To Melancthon's Official Plan states:

The Aggregate Resources Act application is for a licence limiting the depth of excavation to 1.5 metres above the watertable. It is proposed that the use would share the annual excavation limit of 1,250,000 tonnes that now applies to the Strada pit to the north in the west half of Lot 13, Concession 3, O.S. Reserves in that pit have been depleted and the proposed extractive industrial use is intended to initially supplement and then replace that pit. The applicant's recently submitted Planning Report indicates that there is approximately 4.6 million tonnes of extractable mineral aggregates on the subject lands above the watertable.

And further in Part 2 section 2.2 of the Planning Report.

*Strada's Shelburne Pit reserve have been depleted quickly due to major projects such as the Shelburne Windmill Project. It is estimated that approximately 500,000 tonnes remain. These reserves provide limited product variations. Strada proposes to blend the remaining Shelburne Pit reserves with materials from the proposed Melancthon Pit in order to continue to provide a range of quality products to their existing and future customers. Although the 2 pits are separated by a 50 acre parcel owned by a third party.*

I took this high demand to be referring to the roads base as well as cement bases for the wind turbines in Melancthon and Amaranth. A portable batching plant was brought into the existing pit to make the cement for these turbine bases.

Part 2 section 2.3.1 Land Holdings states: *test pits confirmed that the Smith properties contain at least 7.5 metres of stoney aggregate. Six boreholes were advanced through the gravel and overburden to the underlying dolostone, as part of Strada's groundwater investigation and to confirm the thickness of aggregate and overburden.*

Part 2 section 2.3.3 Project Description states:

*A quantitative estimate of the possible resources available from the proposed Melancthon Pit was calculated. This calculation is based on the proposed extraction limit illustrated on Figure 3, Simplified Operational Plan, and to 1.5 metres above the watertable. The results indicate that there is approximately 4.6 million tonnes of extractable material from above the water table.*

*As previously noted, the Melancthon Pit is to be operated in conjunction with the existing Shelburne Pit, and can take advantage of existing haul routes. The existing annual tonnage limit of 1,250,000 tonnes is to be shared between the existing and proposed pit.*

However, at the Open House in August, Strada advised, in front of at least 3 witnesses, that they have only taken about 500,000 tonnes per annum out of the existing pit, and they have approx 6 Million tonnes remaining in the existing pit. If they have 6 M tones remaining in the existing pit at Part West Lot 13 Con 3 OS and the subject lands only have 4.6 tonnes, why are they even applying for a license on Part west Lots 11 and 12, Con 3 OS at this time?

These figures seem to be misleading if not misrepresenting the situation. Why permit expansion to another pit when it would appear they have not exhausted the present one?

Therefore I object to the granting of a second license on Part West Lots 11 and 12, Con 3 OS before the present pit on West part Lot 13, Con 3 OS is exhausted AND rehabilitated.

Sincerely



Beverly Parker  
477107 Third Line  
RR #2, Shelburne  
ON  
L0N 1 S6

**Denise Holmes, AMCT**

---

**From:** Dennis Sanford [dssanford@xplornet.ca]  
**Sent:** Monday, September 06, 2010 10:34 AM  
**To:** mpietrolungo@strada-aggregates.com  
**Cc:** diane.schwier@ontario.ca; Denise Holmes  
**Subject:** Proposed Melancthon Pit  
**Attachments:** Strada objection letter.pdf

Dear Mr. Pietrolungo,

Please read my attached letter regarding the application for the proposed Melancthon Pit, located on Part of the West Half of Lots 11 & 12, Concession 3 O.S.

Sincerely,  
Dennis Sanford  
[dssanford@xplornet.ca](mailto:dssanford@xplornet.ca)  
tel. 519-925-5556

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Dennis Sanford  
398132 5<sup>th</sup> Line Melancthon  
R.R. #6  
Shelburne, Ontario L0N 1S9  
519-925-5556  
E-mail:  
dssanford@xplornet.ca  
September 6, 2010

Strada Aggregates Inc.  
c/o Mario Pietrolungo  
30 Floral Parkway  
Concord, Ontario L4K 4R1

***Sent by E-mail to: mpietrolungo@strada-aggregates.com***

Dear Mr. Pietrolungo,

**Re: Application for proposed Melancthon Pit, located on Part of the West Half of Lots 11 & 12, Concession 3 O.S.**

I have many concerns about the proposed pit. The major points I would like to bring up follow:

The applicant, Strada Aggregates Inc., is already operating a pit to the north of the potential new site. They propose to “split” the maximum allowable tonnage from their existing pit with the new pit. Will the original license be amended (i.e., reduced) in order to guarantee that there will be no more trucks on the road than the present license allows, even with the two functioning pits, and that some day, with favourable market conditions, the company could arbitrarily, without notice, begin putting more trucks on our roads?

I do not know what to believe about the estimated volume of gravel remaining in the existing pit and consequently in the proposed new pit. This concerns me about how these projections relate to the traffic volume, as noted above, and the projected lifespan of two pits. It is stated twice in the Strada Planning Report, April 2010, that only 0.5 million tonnes remain in the original pit. Their license allowed for 1.25 million tonnes to be removed each year (approved by the MNR and the Township of Melancthon in 2003 ) and their original projection stated the potential of 9.7 million tonnes. If they started operations in 2004, six years ago, then they have clearly been shipping more than their license allows. If they have not been shipping 1.25 million tonnes per year, then there must be more in the existing pit than we are being told. What is the truth? This speaks to me about the overall credibility of the company's projections and their plans.

I am concerned about the loss of 2 functioning farmsteads. One of the existing farmsteads will be demolished completely, and the other will be reduced only to a residence, with no stated commitment by the company to maintain it as a residence. Will it be rented out as a dwelling? (I will pose the question why would anyone choose to live so close to a working pit with all the noise and dust present constantly?) Will the house become a storage shed for Strada? Will it be maintained properly, so that one day it could become a habitable house again, or will it be allowed to degrade to the point where it

SEP 23 2010

must be demolished? These questions are particularly relevant in a township that has lost 22 farmsteads in the past three years due to the unfettered self-interest of another company, with declared aggregate intentions, pursuing profit in our township. All of this loss is within 5 or 6 miles of the proposed site. Although not directly related, the actions of these two companies combine to create a serious offense to the community, and many people, myself included, resent their intrusions.

*The Places to Grow Act of 2005*, cited by the Strada Planning report, requires our township to provide for increased population. How is this accomplished by removing houses from the township? They state that “the proposed Melancthon Pit will provide increased employment in the Township of Melancthon”. The employees of this proposed pit will only benefit the Township if they actually live in the township, paying taxes to the township. Otherwise they take their paycheque and their “community needs” somewhere else, and their only “contribution” to the community will be to use our roads. Will Strada guarantee that the employees will live in Melancthon, so that their declaration of increased employment has some real meaning to the Township?

I am concerned about the loss of prime agricultural land. From the day of the commencement of the excavation until some unknown (unknowable?) day in the future, there will be no food coming from that land. Even if the rehabilitation plan is followed to the letter of the plan, and is successful, there will be 25% less farmable land on these two lots, as shown on the table provided in their report. Elsewhere in this report, and stated clearly in the Township's Official Plan, the rehabilitation shall return “substantially the same area and average soil quality” back to agriculture. I don't agree that 75% is “substantially the same area”. And I must wonder about the long term viability of the soil and the newly reshaped landscape to produce the same crops with the same yields. Can someone provide assurances here?

And what is happening in the “progressive rehabilitation” of the first Strada pit? Has there been any progress there that Strada could show the residents and the Melancthon Council? Is not the Township entitled to know on a regular, ongoing basis the status of the first pit rehabilitation? Based on statements made by the company about the low reserves in the first pit, one would think that the rehabilitation must be well along by now, six years into their operation. I thought “progressive” rehabilitation happened “behind” the advancing excavation. This is what the approved site plans declare. I would like to see proof, and such proof of progress should be a requirement of approval for any future pit. How many more years will this land be devoid of life?

I am concerned about water quality. We have assurances from their qualified experts in expensive, detailed reports, and reassurances from the qualified experts hired by the Township to review those reports that “potential impacts to the groundwater and surface water systems are limited to negligible.” What I see, as a layman, is the removal of 25 feet or so of water filtration material that has functioned effectively for thousands of years. What about the cumulative effects on water quality of one more open “wound” in the layer of sand and gravel that adds to this vital filtration system?

I wonder about the real, long term impacts to the ponds and the wetland in the northeast of the property and the nearby woodlands. Will the activity and the excavations in that area degrade the habitat during the pit lifespan to the point where species move out, not to return? Why couldn't that area be more widely avoided in order to provide more protection to the habitats there and the species dependent on them?

In conclusion, I will state that I am opposed to the creation of another gravel pit in this area. Melancthon's needs can be served for some time to come from the existing pits. This is really about providing for the growth and development elsewhere with minimal true benefit returning to this

township and the people who will have to live with and deal with the damage done. In reality, I know that this approval process comes down to the various paid professionals following a prescribed procedure with objecting residents trying to find “holes” in the company's plan, and the professionals coming back with reasons why the layperson's objections are unfounded, invalid or “within acceptable provincial guidelines”. It seems to me that the whole process is slanted in favor of the proponent and will lead to an inevitable outcome. The process is just a formality. I don't see anything in the process that asks one simple question: Is this the right thing to do?

Sincerely,

Dennis Sanford  
519-925-5556  
E-mail:  
[dssanford@xplornet.ca](mailto:dssanford@xplornet.ca)

C.C. Diane Schwier, E-mail: [diane.schwier@ontario.ca](mailto:diane.schwier@ontario.ca)  
C.Cl. Denise Holmes, E-mail: [dholmes@melancthontownship.ca](mailto:dholmes@melancthontownship.ca)



August 31, 2010

Marni Walsh  
P.O. Box 36, R.R. #5  
Dundalk, ON N0C 1B0

Dear Ms. Walsh

**RE: STRADA AGGREGATES INC. – MELANCTHON PIT, TOWNSHIP OF  
MELANCTHON, AGGREGATES RESOURCES ACT APPLICATION**

---

Thank-you for attending the information session on August 19, 2010 and for your interest in the applications pertaining to our new proposed Melancthon Pit located on Part of the West Half of Lots 11 & 12, Concession 3 O.S. The following is in response to the comments you provided on August 18, 2010:

1. *I ask that any and all documentation proving that these issues were rectified and reviewed by Bluewater Geosciences as rectified, be presented at a public meeting. Will Strada comply?*

**Response:** Strada and our hydrogeologist, Tecia White, responded on August 6<sup>th</sup> and 16<sup>th</sup>. Responses from Bluewater Geosciences were provided on August 13<sup>th</sup> and 17<sup>th</sup>. These responses are available at the Township office.

2. *What fines will Strada be paying to Melancthon Township for exceeding water taking and for the hazardous spill in the well?*

**Response:** Water taking is regulated by the Ministry of Environment. No fines are owing to the Township. Water-taking exceedances reported in 2009 were likely the result of calibration errors and the water taking is in compliance with permit requirements.

3. *I ask to see documentation presented at a public meeting, proving that investments have been made to ensure that future monitoring complies with Township/Provincial regulations. Will Strada comply?*

**Response:** Strada is in compliance with the Ontario Water Resources Act. Strada has agreed to augment the compliance groundwater quality sampling program by adding additional monitoring wells. The details of this program are provided in the August 16<sup>th</sup> letter from Whitewater Hydrogeology to the Township of Melancthon and the Bluewater Geoscience letter dated August 17, 2010.

4. *Over the past 6.5 years Melancthon should have realized \$510,000 in aggregate levies based on Strada tonnage removed. (Approximately 8.5 million @ .06 cents per*



*tonne). Was this amount paid to the Township of Melancthon? What arrangements have been made for paying for it and when will it be paid in full?*

**Response:** Licence fees were increased in 2007. Strada has paid the required licence fees to The Ontario Aggregates Resources Corporation (TOARC). TOARC disburses the applicable funds to the municipalities. The Municipality would have a record of monies received.

*5. I ask to see documentation presented at a public meeting, proving that no excessive tonnages has been taken and that proper monitoring is in place to ensure that no excessive tonnage will be taken. Will Strada comply?*

**Response:** Annual production records are confidential. There have not been any exceedences. The MNR and TOARC have authority to review records and conduct reviews.

*6. What cumulative impact studies to water in watersheds have been completed? When will they be made public?*

**Response:** The required studies have been completed and made public. Please refer to the letter from Whitewater Hydrogeology dated August 16, 2010 available at the Township office regarding cumulative impacts.

*7. I ask to see documentation, proving that no dirty water is being introduced back into our aquifer. Will Strada comply?*

**Response:** The Strada wash plant is a closed loop system approved by the Ministry of Environment (MOE). The aggregate washing facility will be designed based on consultation with the MOE during the application process for an Ontario Water Resources Act Section 34 Permit to Take Water. There are several types of closed loop designs, all of which require a filtration system. These filtration systems can be natural or constructed systems, depending on the environmental conditions. All closed loop systems have clean water returned directly to the washing pond for re-use.

*8. Do you understand, as a corporation, that your public trust has been shattered due to these negative reports, and by Strada's lack of consideration to neighboring residents regarding issues with trucks, noise, and tree removal amongst other complaints?*

**Response:** Strada has had regular communications with its neighbors regarding matters relating to our existing operations and proposed operation. Strada has implemented a trucking policy in response to truck concerns. We would like to eliminate parking of trucks servicing the Strada Pits on County Road 124 and County Road 17. Strada intends to continue regular communications with neighbours.

*9. With the previously mentioned contraventions, very few local employees, and the current cost of road repair exceeding the income from levies garnered from Strada, what possible benefit is there to Melancthon Township to allow Strada to continue business, let alone expand it?*



**Response:** Strada has contributed approximately \$700,000.00 for improvements to County Road 17, 124 and 4<sup>th</sup> Line and \$70,000.00 to the Township for resurfacing.

The proposed pit will allow for the continued availability of an essential non-renewable resource from a close to market location, continued employment for 10 families, continued revenues in the form of aggregate levies, continued property and fuel tax revenues, and the continuation of road maintenance agreements with the County and Township.

We trust the above addresses your comments. Should you have any additional comments or questions, please do not hesitate to contact us.

Yours truly,  
**STRADA AGGREGATES INC.**

  
Grant C. Horan

CC Mario Pietrolungo

Cc: Denise Holmes (Township of Melancthon)



August 31, 2010

Karren Wallace  
R.R. #6, Shelburne, ON  
L0N 1S9

Dear Ms. Wallace

**RE: STRADA AGGREGATES INC. – MELANCTHON PIT, TOWNSHIP OF  
MELANCTHON, AGGREGATES RESOURCES ACT APPLICATION**

---

Thank-you for attending the information session on August 19, 2010 and for your interest in the applications pertaining to our new proposed Melancthon Pit located on Part of the West Half of Lots 11 & 12, Concession 3 O.S. The following is in response to the comments you provided on August 18, 2010:

**Comment:** *Who is responsible for monitoring the site plan controls placed on the existing pit?*

**Response:** Strada and the Ministry of Natural Resources (MNR).

**Comment:** *Why are trucks lining up idling on the Cty Road 124 and Cty Road 17 as early as 5a.m.- sometimes there are as many as 15 trucks lining 17 by 5:30a.m.*

**Response:** Strada has implemented a trucking policy in response to this issue. We would like to eliminate parking of trucks servicing the Strada Pits on County Road 124 and County Road 17. If residents observe trucks parking on these roads they should let us know by contacting Ken Galbraith at 519-925-6100.

**Comment:** *At .06 per tonne (as per Regulation 244/97) and it is estimated that 700, 000 tonnes will be removed annually from the proposed pit. The Municipality stands to realize \$42,000 in revenue annually. According to the Township's own roads superintendent it costs approximately \$64,000 to pave a kilometer of road. How does this benefit Melancthon ratepayers?*

**Response:** The per tonne licence fee is not dedicated for any specific purpose. There are many other users of municipal roads and sources of revenue that the municipality may elect to spend on road improvements. There are other revenues generated by the pit operations such as property and fuel taxes. Strada has contributed approximately \$700,000.00 for improvements to County Road 17, 124 and 4<sup>th</sup> Line and \$70,000.00 to the Township for resurfacing.

**Comment:** *How many full-time on-site positions are at the Strada pit now?*



# **STRADA**

## **AGGREGATES**

**Response:** Strada employs 10 people at the existing Shelburne Pit. These jobs will continue to exist in this area if new reserves are licensed.

**Comment:** *What are the rehabilitation plans for the existing pit- what, when? Do you have money on deposit with the Township should your rehabilitation plans not materialize so the Municipality can rehabilitate it themselves at no cost to tax payers?*

**Response:** The rehabilitation plans for the existing pit includes the progressive rehabilitation back to agriculture and the regeneration of natural areas. The Aggregate Resources Act Site Plans include more specific information about the rehabilitation measures.

The Municipality is not responsible for rehabilitation. If an ARA licence is revoked The Ontario Aggregate Resources Corporation (TOARC) administers a fund that is available for rehabilitation where the licensee has not completed the required rehabilitation.

**Comment:** *If there was an estimated 9 million tonnes in the existing pit and a remaining 500,000 tonnes at .06 per tonne, Melancthon should have realized \$510,000.00. Was this amount paid to the Township of Melancthon over the past 6 and a half years?*

**Response:** Licence fees were increased beginning in 2007. Strada has paid the required licence fees to TOARC. TOARC disburses the applicable funds to the municipalities. The Municipality would have a record of monies received.

**Comment:** *Your report states that you are only going to produce 700,000 tonnes annually in the proposed pit, yet you have a limit of 1.25 million tonnes annually in the existing pit. Why have the estimates in the proposed pit dropped significantly and who is to monitor production and what are the penalties?*

**Response:** The annual maximum is higher than typical/average production to allow for peaks in anticipated demand. Production is monitored by Strada, TOARC and MNR.

**Comment:** *Bluewater, in the same letter, advises: We have raised these issues yearly with Strada and no action has been taken to remedy these deficiencies. Despite this situation, Strada consultants continue to make assumptions based on the inadequate monitoring network.*

*It closes by stating "we understand that Strada has an application for another pit in Melancthon Township in the planning stages. Melancthon Township should consider whether, given Strada's track record of inadequate compliance monitoring, they have shown themselves to be good corporate citizens and have treated the concerns of the citizens and the Council with the rigour they deserve".*

*Please advise why a new proposal should be entertained at this time when there are serious issues with the existing pit?*

**Response:** The Melancthon Pit is monitored in compliance with its requirements. Bluewater's comments have been responded to and Bluewater has clarified its position. Strada has agreed to augment its monitoring programs in response to Bluewater's review. Correspondence documenting the resolution of this issue are part of the public record and available at the Township office.



We trust the above addresses your comments. Should you have any additional comments or questions, please do not hesitate to contact us.

Yours truly,  
**STRADA AGGREGATES INC.**

*Grant C. Horan*  
Grant C. Horan

CC Mario Pietrolungo

Cc: Denise Holmes (Township of Melancthon)



September 02, 2010

Karren Wallace  
R.R. #6, Shelburne, ON  
L0N 1S9

Dear Ms. Wallace

**RE: STRADA AGGREGATES INC. – MELANCTHON PIT, TOWNSHIP OF  
MELANCTHON, AGGREGATES RESOURCES ACT APPLICATION**

---

Thank-you for attending the information session on August 19, 2010 and for your interest in the applications pertaining to our new proposed Melancthon Pit located on Part of the West Half of Lots 11 & 12, Concession 3 O.S. The following is in response to the comments you provided on August 30, 2010:

*1) Do the plans call for a marshalling yard on site?*

**Response:** No, through discussions with the Township it was decided that there were some downsides in establishing a standalone marshalling yard.

*2) If not, how does Strada intend to deal with the unsafe conditions and environmentally destructive practice of trucks lining and idling on County Road 17 on a daily basis from 5 am to 6 am?*

**Response:** Strada has implemented a trucking policy in response to this issue. We would like to eliminate parking of trucks servicing the Strada Pits on County Road 124 and County Road 17. If residents observe trucks parking on these roads they should let us know by contacting Ken Galbraith at 519-925-6100.

*3. How big is the current pit? (acres please)*

**Response:** Licensed Area = 100.6 acres, Limit of Extraction = 88 acres.

*4. Please confirm the application for the proposed new pit under the ARA and the rezoning and OPA are for an additional 92 acres only.*

**Response:** The extraction area is limited to 92 acres under the ARA site plan. The buffer areas and setback are normally included in the licensed area so that the necessary controls and their use are covered under the ARA license. The area to be licensed and designated in the Official Plan is 117 acres. The proposed zoning establishes both extraction and buffer areas consistent with the ARA site plan.



5. Please confirm that the ARA does not provide for digging below the water table.

**Response:** The site plan under the ARA does not permit extraction below water table.

6. Please confirm that the current pit is licensed for up to 1.25 tonnes of aggregate production a year and that the total between the two pits will not exceed that.

**Response:** The total tonnage limited between the existing pit and proposed pit will be limited to 1.25 million tonnes per year.

7. If the combination between the two pits is not to exceed 1.25 tonnes, will you be amending the license for the existing pit so it reflects this new limit?

**Response:** The combined limit can be enforced without amending the existing license, but for additional clarity Strada would be prepared to amend the existing license if required by the MNR.

8. What measures are you proposing to deal with noise, dust, traffic?

**Response:** There are a variety of measures that will mitigate noise, dust and traffic. Some of these are incorporated on the site plans; others are covered in the Operating Standards or prescribed conditions. Other legislation also applies such as the Highway Traffic Act, Ontario Water Resources Act, and Environmental Protection Act.

9. Please advise if your current site plan provides for storage of turbines, as was the case a couple of years ago. If not, does that mean Strada was in violation of their site plan agreement while those turbines were stored on site?

**Response:** Strada is reviewing this with the Ministry of Natural Resources and will provide a response as soon as possible.

10. Please advise of a communication plan to neighbours and Council, NOT just during this process, nor as legislatively mandate, but on an on-going, long term basis.

**Response:** Strada has an "open door" policy whereby neighbours, concerned residents, etc. are welcome to voice both their issues and gratitude's to Ken Galbraith, Grant Horan, or Mario Pietrolungo.

11. Will Strada be providing a contact number for after hours and weekends should problems occur during those periods

**Response:** Yes, please contact Ken Galbraith at 519-925-6100.

12. Should Strada decide to amend their application and site plan to dig below the water table, are they legislatively obligated to advise the impacted neighbours and Council or would this be considered a "minor" variance under the existing site plan and license and the MNR would have total jurisdiction over that with no notice to neighbours or Council as in the case of the berm being moved recently.



**Response:** Applications to amend site plans for extraction within the water table are a major site plan amendment and specific policies would apply including requirements for a full hydrogeological impact assessment, government agency review, circulation to municipalities and adjacent landowners, public notice (newspaper notice and sign posting), posting on the EBR, and a public information session.

13. *What is Strada's relationship with St. Mary's Cement with respect to the pit on the 3rd Line.*

**Response:** Strada & CBM have entered into a business agreement whereby Strada will extract/process, load & scale CBM material.

14. *What voluntary contributions have Strada made to the betterment of the community for things like parks, renovation of Hornings Mills Hall, Honeywood Arena, sponsoring minor hockey & ball teams, figure skating, Shelburne and Dundalk pools, library, etc.*

**Response:** Strada has provided donations to the Rotary Club, Agricultural Society, Arena Board, and Ball Hockey clubs, just to name a few.

15. *To confirm what I was advised at the open house that Strada held in Hornings Mills in August, there are 3 permanent positions on site (seasonal) and there can be up to another 5 positions as needed on site. These are not full time, but on an as needed basis.*

**Response:** For the Shelburne facility, Strada Aggregates employees three permanent positions (one of which is on an hourly basis) and Strada Crush employs seven positions (six of which are on an hourly basis). Depending on production requirements, the Strada Crush hourly employee requirement will change month/month.

16. *Your April 20, 2010 report contains a factual error. Page 5 provides the following statement: **Strada's Shelburne Pit located north of the site. It commenced operations in the spring of 2004, with estimated reserves of about 9 million tonnes. Approximately 500,000 tonnes remain as a result of high demand in this area.** In fact Strada advised me they have taken approximately 500,000 tonnes per year out of this pit, for an approximate total of aggregate removed of 3 million tonnes, which would leave approximately 6 million tonnes in the existing pit. Will Strada be amending this report to reflect the true amount of aggregate remaining in the existing pit?*

**Response:** Pre-extraction estimates are approximate and the quality of the material varies. The actual amount of extracted materials are commonly less than pre-extraction estimates. The Shelburne Pit is nearing depletion and remaining material has quality limitations such that Strada cannot supply a full range of products.

17. *Please confirm there are no plans to rehabilitate the existing pit as it will still be operating in conjunction with the new pit.*

**Response:** Rehabilitation of the existing Shelburne Pit is underway. The Shelburne Pit will continue to be progressively rehabilitated as the Melancthon Pit is opened. The Shelburne Pit and Melancthon Pit will operate in conjunction with each other over a transition period. The rehabilitation of the Shelburne Pit will be completed when it is depleted.



18. *What measures are in place to ensure that rehabilitation occurs and that Strada just doesn't deplete the pit and leave or leave 10% of the aggregate which means they don't have to rehabilitate at all.*

**Response:** See above response to question #17. If an ARA license is revoked The Ontario Aggregate Resources Corporation (TOARC) administers a fund that is available for rehabilitation where the licensee has not completed the required rehabilitation.

19. *Does Strada have a representative on the Aggregate Resources Trust?*

**Response:** No.

20. *Is Strada a member of the Ontario Sand and Gravel Association?*

**Response:** Yes.

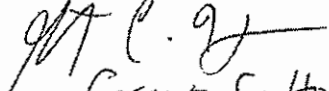
21. *Also, just to confirm you called the other day and advised me that the tax rate on the Strada lands is Extractive Industrial M2. In fact that is your zoning, NOT the tax rate. Can you please advise me what tax rate Strada pays for their current operation?*

**Response:** Strada to advise tax rate.

We trust the above addresses your comments. Should you have any additional comments or questions, please do not hesitate to contact us.

Yours truly,

**STRADA AGGREGATES INC.**

  
Grant C. Horan

Cc: Mario Pietrolungo

Cc: Denise Holmes (Township of Melancthon)

To: Melancton Township Council  
CAO Denise Holmes  
Melancton Township, Ontario

To whom it may concern:

I am writing to voice my objections to the Application for a license to open a new aggregate pit within the township of Melancton.

Site location :Part of the West Half of Lot's 11 & 12 Concession 3 O.S Township of Melancton, County of Dufferin.

I attended the open house and the answers that I received regarding the proposed location were very concerning.

The questions I asked and received answers to are below:


- 1) Q: Where is the truck marshalling yard Located?  
A: There will be no truck marshalling yard, the request was a want by the current Melancton Mayor and it was deemed that this could not be accommodated. Therefore trucks would wait on Cty Rd 17, but companies would be requested not to arrive so early that they have to line up and wait on the main road.  
I found this quite disturbing, because the trucks parked on the main road creates a hazard for traffic especially in the winter.
- 2) Q: Was there a plan to rehabilitate the current pit once it had been exhausted of its capacity.  
A: There was no official plan to rehabilitate the current pit and there no information to explain what Strada had done in the past to rehabilitate any aggregate locations that had been exhausted.  
Note: As per website <http://www.gravelwatch.org/orig-gw/gravelwatch/rehab.htm>, Rehabilitation of gravel pits within Ontario is non existent. Why this company should be allowed to expand into yet another pit when they clearly have no plan to revitalize the area that they have consumed. Strada needs to become a good corporate neighbour and show some due diligence.
- 3) Q: Why did Strada allow their environmental reporting to lapse. As mention in the April 2010 Melancton council meeting Minutes:  
A: Strada did not let reports lapse. They were submitted to the Ministry of the Environment as required and just because Melancton had no record of it, did not mean it was not done.
- 4) Q: What is Strada doing to ensure they comply with the water taking guidelines as stated in the Melancton Council meeting minutes?  
A: Water taking guidelines have been met and the errors recorded were mistakes. Compliance has always been maintained by Strada.
- 5) As a note on the trucking issue. I travel Dufferin county road 17 everyday on my way to work. The intersection of county road 17 and hwy 124 is too narrow for large aggregate trucks to maneuver. I have to set back 30 meters from the entrance because trucks turning cut the lane, and are a hazard to myself should I hit my vehicle. I believe that Strada should be responsible to make this intersection safer. A possible solution to this would be to make the 4<sup>th</sup> Line OS from Hwy 10 to The Strada pit a county road, thus letting them have jurisdiction over the repairs and the intersection would be safer.

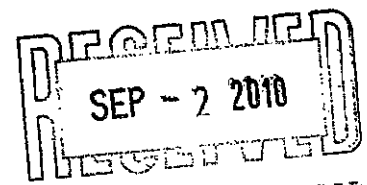
Closing:

Based on this information I believe that Strada is in no position to open a 2<sup>nd</sup> pit , as they have not clearly demonstrated a plan to rehabilitate or govern the safety of the roadways to the residents and flow through traffic as well their environmental management needs improvements before commencing with a new pit.

This application should be denied.

Bart Malloy  
197491 2<sup>nd</sup> Line N.E RR4  
Melancton Township  
Dundalk Ontario, N0C1B0

 09-01-2010



SEP 23 2010

August 30, 2010

Mr. Craig Lang  
c/o Ontario Ministry of Natural Resources  
Midhurst District Office  
2284 Nursery Road  
Midhurst, Ontario, L0L 1X0

Ms Diane Schwier  
c/o Ontario Ministry of Natural Resources  
#1 Stone Road West  
Guelph, Ontario, N1G 4Y2

Strada Aggregates Inc.  
Attn. Mr. Grant C Horan & Mr. Mario Pietrolungo  
30 Floral Parkway,  
Concord, Ontario, L4K 4R1

Ms. D. Fawcett  
Mayor of Melancthon Township  
RR#6 Shelburne Ontario  
L0N 1S9

I am Mervyn C. Parker a resident and owner of a property at 477107 Third Line OS Melancthon twp, ON which is situated to the east of Strada's pit on Lot 13, 4<sup>th</sup> line of Melancthon twp.

I am writing to submit my objection to the application by Strada Aggregate Inc. for a permit to extract aggregate from their new property on Lots #11 & 12, Conc.#3, 4<sup>th</sup> Line OS Melancthon Twp.

My objection is based on the fact that I have observed Strada personnel at their present pit located on Lot #13 Conc. #3, 4<sup>th</sup> Line OS Melancthon twp (licensed for aggregate extraction in 2004) to be in violation of the requirements specified in their permit application which was approved by the Ontario Ministry of Natural Resources (MNR) and recorded in Amendment #13 of Melancthon's Official Plan.

The violations refer to two documented instances which occurred in July 2010 and August 2010, when Strada employees continued crushing / extraction operations past their specified closing time of 5PM weekdays. These incidents were reported to Mr. Craig Lang of the MNR office in Midhurst and to the CAO of Melancthon TWP.

In addition to the two noted violations re hours of operation, I also consider that Strada is in non-compliance of requirements "to mitigate noise and dust relating to their operations by measures taken on sight" as specified as part of their application for license.

Although Strada did initially build a berm around their property in 2004, in August of 2010 they proceeded to bulldoze the tree line on the east side of their property and relocate their berm eastward onto property owned by Canadian Building Materials (CBM) / Saint Mary's Cement (SMC) that is also licensed for aggregate extraction. This action was taken in cooperation with CBM / SMC and the necessary amendment to Strada's pit license approved by MNR without prior notification to neighbours or Melancthon Council.

SEP 23 2010

This action taken by Strada to re-arrange the skyline by removing the trees and moving their berm eastward has in fact amplified both noise and dust from their operations due to the fact that the prevailing winds blow from the west and the new location of their berm is below the level of operations allowing dust and noise to drift eastward without any mitigation. A situation that neighbours find irritating and frustrating due to disruption of sleep at 6AM weekdays plus impaired air quality from the dust. Some days the dust created by Strada operations looks and feels like a desert dust storm that I have personally experienced in Africa.


Based on my observations to-date it appears that Strada has been permitted to operate their aggregate extraction operations by self-regulation a situation that clearly is not working, is unacceptable and not in the best interests of the residents of Melancthon twp. I am a retired federal aviation security inspector with 10 years experience monitoring airports and air carriers in Ontario. Based on my observations and subsequent investigations it was noted that when profit margin and on time departure/ delivery were restricted by compliance with rules and regulations chances are that unless inspectors were present to observe & document violations for prosecution, the operators would take the risk and disregard the restrictions / requirements in the interest of corporate greed. This I suspect to be the case concerning Strada's operation at their aggregate pit situated on 4<sup>th</sup> line OS Melancthon twp ON.

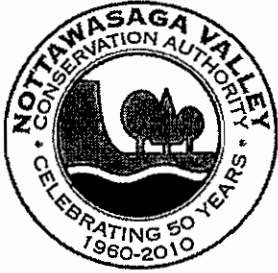
I further submit that Strada has also expanded their operations outside the parameters of their original permit by allowing a cement batching operation to be set up on their property possibly taking more water than Strada was permitted to take. Such a violation was noted in 2009. Strada also provided for the storage of wind turbines on their property prior to installation. This was done on behalf of Hydro-1. This act of storing materials belonging to another company/owner is, I believe to be a "commercial operation" that was not included in the scope of Strada's aggregate license for their pit on 4<sup>th</sup> Line of Melancthon twp. Based on these multiple violations and record of non compliance, I do not believe that Strada Aggregate Inc. should have their new pit application approved until such time as they can demonstrate that they are a responsible corporate neighbour and accept responsibility and commit to compliance with regulations and requirements specified for their operations by MNR and Melancthon Township without constant on-sight supervision and inspection.

I further submit that in my opinion Strada should be mandated to complete extraction operations at their original pit on lot 13 Conc.#3 Melancthon and initiate rehabilitation procedures prior to commencing extraction operations on a separate property.

I therefore believe this to be a valid objection to the application submitted by Strada for a license to extract aggregate from their new property located on Lots 11&12 Conc. #3, 4<sup>th</sup> line OS Melancthon, based on their non-compliance with requirements specified for their present extraction operations in Melancthon.

Submitted without prejudice for your information, consideration and appropriate decision  
Sincerely;

  
Mervyn C. Parker  
477107 Third line OS  
RR # 2 Shelburne Ontario L0N 1S6  
(519) 925 - 5220



September 16, 2010

Denise Holmes, CAO/Clerk  
Township of Melancthon  
157101 Highway 10, R.R. #6  
Shelburne ON L0N 1S9

Dear Ms. Holmes:

**Member  
Municipalities**

**Re: Application for Official Plan and Zoning By-Law Amendments  
Proposed New Aggregate Operation (Strada - Melancthon Pit)  
Lots 11 and 12, Concession 3 OS, Township of Melancthon**

---

- Adjala-Tosorontio
- Amaranth
- Barrie
- The Blue Mountains
- Bradford-West Gwillimbury
- Clearview
- Collingwood
- Essa
- Grey Highlands
- Innisfil
- Melancthon
- Mono
- Mulmur
- New Tecumseth
- Oro-Medonte
- Shelburne
- Springwater
- Wasaga Beach

In response to the Notice of Public Meeting, Nottawasaga Valley Conservation Authority (NVCA) staff offer the following comments:

NVCA staff understands that the purpose of the application is to redesignate and rezone the subject lands to permit an above water aggregate (gravel) pit.

As noted in our previous correspondence, the subject site is within the Boyne River watershed and contains wetland features. NVCA's review comments continue to be focused on the long term protection of environmental features and the water resources of this area. In regards to the proposed amendments, the draft documents include provisions that address extraction above the water table and protection of the environmental features including appropriate buffers and monitoring. In general the proposed amendments speak to the matters pertinent to the NVCA. NVCA staff wishes to continue working with the proponent and Township staff to ensure that the final amendments along with the Aggregate Resources Act Site Plans provide for the long term protection of environmental features and the water resources of this area.

Thank you for the opportunity to comment on this application and please feel free to contact the undersigned should you have any questions regarding the above comments.

Regards,

Chris Hibberd, MCIP, RPP  
Director of Planning

**Watershed  
Counties**

- Dufferin
- Grey
- Simcoe

Copy: NVCA Member, Mr. Debbie Fawcett  
Township of Melancthon, Mr. Jerry Jorden  
MMAH, Mr. Andrew Doersum  
MHBC, Mr. David Barrett

Member of



Conservation  
ONTARIO  
Natural Champions

*Celebrating 50 Years in Conservation 1960-2010*

*September 20, 2010*

Objection to the proposed Zoning By law amendment and Official Plan Amendment to rezone the Strada Aggregate Inc. property on fourth Line OS, Conc. 3 Melancthon Twp ON from rural to aggregate industrial

D. Fawcett, Mayor of Melancthon Township  
[dfawcett@melancthontownship.ca](mailto:dfawcett@melancthontownship.ca)

Denise Holmes CAO Melancthon Township ON  
[dholmes@melancthontownship.ca](mailto:dholmes@melancthontownship.ca)

Ms. Diane Schwier  
Ontario Ministry of Natural Resources  
Guelph, Ontario  
[Diane.schier@ontario.ca](mailto:Diane.schier@ontario.ca)

Mr. Mario Pietrolungo  
c/o Strada Aggregate Inc.  
Concorde Ontario  
[mpietrolungo@strada-aggregates.com](mailto:mpietrolungo@strada-aggregates.com)

I understand that the Ontario government has identified a portion of land in Melancthon as being a suitable source for aggregate extraction. This decision plus the action taken by the Mike Harris government to amend the aggregate act; downsize the Ministry of Natural Resources and allow the aggregate industry to become self regulating, a situation that is clearly not working, has in essence made Melancthon twp like an unfenced chicken coop ripe for the plucking by aggregate & profit hungry foxes.

I also understand that our children are no longer interested in following a career that involves long hours of difficult work on a daily basis from dawn to dusk, a life style with questionable results that agricultural production & farm operations require.

With many of our resident farmers currently reaching retirement age and no one in the family willing to take the reins the prospect of selling their property to an aggregate company is often considered to be a beneficial solution.

The Strada property on 4<sup>th</sup> line Melancthon presently being considered for re-zoning from rural –agricultural to aggregate industrial has successfully been farmed for the past two hundred years or more and in fact presently has a magnificent crop of corn on it which should bring in a profitable revenue.

This being said I also note the presence of at least 4 gravel pits in Melancthon twp that contain various grades of aggregate most less than prime. In fact operations at the former Moyer pit on 3<sup>rd</sup> line Melancthon were halted a few years back due to the poor quality of aggregate that may prove to be the case with the property being considered for re-zoning. Two years ago for reasons unknown St Mary's Cement / Canadian Business Materials (CBM) companies bought the 100 acre Moyer pit knowing that it contained a poor quality of aggregate. However in the past few months they (CBM) have concluded a business agreement with Strada Aggregates Inc. to allow Strada to conduct aggregate extraction operations on their property on 3<sup>rd</sup> line that adjoins the Strada pit on 4<sup>th</sup> line

Melancthon. This agreement was confirmed in a letter from Strada Aggregate Inc to Karren Wallace & council dated Sept 2<sup>nd</sup> 2010. (See Attachment)

In conclusion I do not believe that the Strada property on 4<sup>th</sup> line OS Melancthon should be rezoned from rural agricultural to aggregate industrial. I base this belief on the fact that there are other properties in the township such as that owned by Denise Holmes and her husband that were rezoned some years ago from rural to aggregate industrial but which have not as yet been explored. This fact plus the questionable quality of aggregate which the Strada property may contain; Strada's recent deal with CBM, to commence the extraction of aggregate on the CBM property and the apparent lack of rehabilitation being taken by existing aggregate operations in Melancthon begs me to question the need to approve the request from Strada Aggregate Inc to re zone their property from rural to aggregate.

The bottom line my friends is this:

A choice between one crop of aggregate and a blight on the landscape or multiple crops providing food and energy (ethanol) sources for years to come maintaining our rural landscape which is quickly diminishing due to corporate exploitation.

I therefore submit this as my formal objection to the subject by- law amendments /changes and strongly request that you vote to protect the remaining rural landscapes in our township and not approve the creation of another aggregate scar.

Submitted for your serious consideration;

Merv Parker



20/09/10

477107 Third Line OS; RR#2 Shelburne On L0N 1S6



September 02, 2010

Karren Wallace  
R.R. #6, Shelburne, ON  
L0N 1S9

Dear Ms. Wallace

**RE: STRADA AGGREGATES INC. – MELANCTHON PIT, TOWNSHIP OF  
MELANCTHON, AGGREGATES RESOURCES ACT APPLICATION**

---

Thank-you for attending the information session on August 19, 2010 and for your interest in the applications pertaining to our new proposed Melancthon Pit located on Part of the West Half of Lots 11 & 12, Concession 3 O.S. The following is in response to the comments you provided on August 30, 2010:

1) *Do the plans call for a marshalling yard on site?*

**Response:** No, through discussions with the Township it was decided that there were some downsides in establishing a standalone marshalling yard.

2) *If not, how does Strada intend to deal with the unsafe conditions and environmentally destructive practice of trucks lining and idling on County Road 17 on a daily basis from 5 am to 6 am?*

**Response:** Strada has implemented a trucking policy in response to this issue. We would like to eliminate parking of trucks servicing the Strada Pits on County Road 124 and County Road 17. If residents observe trucks parking on these roads they should let us know by contacting Ken Galbraith at 519-925-6100.

3. *How big is the current pit? (acres please)*

**Response:** Licensed Area = 100.6 acres, Limit of Extraction = 88 acres.

4. *Please confirm the application for the proposed new pit under the ARA and the rezoning and OPA are for an additional 92 acres only.*

**Response:** The extraction area is limited to 92 acres under the ARA site plan. The buffer areas and setback are normally included in the licensed area so that the necessary controls and their use are covered under the ARA license. The area to be licensed and designated in the Official Plan is 117 acres. The proposed zoning establishes both extraction and buffer areas consistent with the ARA site plan.



5. Please confirm that the ARA does not provide for digging below the water table.

**Response:** The site plan under the ARA does not permit extraction below water table.

6. Please confirm that the current pit is licensed for up to 1.25 tonnes of aggregate production a year and that the total between the two pits will not exceed that.

**Response:** The total tonnage limited between the existing pit and proposed pit will be limited to 1.25 million tonnes per year.

7. If the combination between the two pits is not to exceed 1.25 tonnes, will you be amending the license for the existing pit so it reflects this new limit?

**Response:** The combined limit can be enforced without amending the existing license, but for additional clarity Strada would be prepared to amend the existing license if required by the MNR.

8. What measures are you proposing to deal with noise, dust, traffic?

**Response:** There are a variety of measures that will mitigate noise, dust and traffic. Some of these are incorporated on the site plans; others are covered in the Operating Standards or prescribed conditions. Other legislation also applies such as the Highway Traffic Act, Ontario Water Resources Act, and Environmental Protection Act.

9. Please advise if your current site plan provides for storage of turbines, as was the case a couple of years ago. If not, does that mean Strada was in violation of their site plan agreement while those turbines were stored on site?

**Response:** Strada is reviewing this with the Ministry of Natural Resources and will provide a response as soon as possible.

10. Please advise of a communication plan to neighbours and Council, NOT just during this process, nor as legislatively mandate, but on an on-going, long term basis.

**Response:** Strada has an "open door" policy whereby neighbours, concerned residents, etc. are welcome to voice both their issues and gratitude's to Ken Galbraith, Grant Horan, or Mario Pietrolungo.

11. Will Strada be providing a contact number for after hours and weekends should problems occur during those periods

**Response:** Yes, please contact Ken Galbraith at 519-925-6100.

12. Should Strada decide to amend their application and site plan to dig below the water table, are they legislatively obligated to advise the impacted neighbours and Council or would this be considered a "minor" variance under the existing site plan and license and the MNR would have total jurisdiction over that with no notice to neighbours or Council as in the case of the berm being moved recently.



**Response:** Applications to amend site plans for extraction within the water table are a major site plan amendment and specific policies would apply including requirements for a full hydrogeological impact assessment, government agency review, circulation to municipalities and adjacent landowners, public notice (newspaper notice and sign posting), posting on the EBR, and a public information session.

13. *What is Strada's relationship with St. Mary's Cement with respect to the pit on the 3rd Line.*

**Response:** Strada & CBM have entered into a business agreement whereby Strada will extract/process, load & scale CBM material.

14. *What voluntary contributions have Strada made to the betterment of the community for things like parks, renovation of Homings Mills Hall, Honeywood Arena, sponsoring minor hockey & ball teams, figure skating, Shelburne and Dundalk pools, library, etc.*

**Response:** Strada has provided donations to the Rotary Club, Agricultural Society, Arena Board, and Ball Hockey clubs, just to name a few.

15. *To confirm what I was advised at the open house that Strada held in Homings Mills in August, there are 3 permanent positions on site (seasonal) and there can be up to another 5 positions as needed on site. These are not full time, but on an as needed basis.*

**Response:** For the Shelburne facility, Strada Aggregates employs three permanent positions (one of which is on an hourly basis) and Strada Crush employs seven positions (six of which are on an hourly basis). Depending on production requirements, the Strada Crush hourly employee requirement will change month/month.

16. *Your April 20, 2010 report contains a factual error. Page 5 provides the following statement: **Strada's Shelburne Pit located north of the site. It commenced operations in the spring of 2004, with estimated reserves of about 9 million tonnes. Approximately 500,000 tonnes remain as a result of high demand in this area.** In fact Strada advised me they have taken approximately 500,000 tonnes per year out of this pit, for an approximate total of aggregate removed of 3 million tonnes, which would leave approximately 6 million tonnes in the existing pit. Will Strada be amending this report to reflect the true amount of aggregate remaining in the existing pit?*

**Response:** Pre-extraction estimates are approximate and the quality of the material varies. The actual amount of extracted materials are commonly less than pre-extraction estimates. The Shelburne Pit is nearing depletion and remaining material has quality limitations such that Strada cannot supply a full range of products.

17. *Please confirm there are no plans to rehabilitate the existing pit as it will still be operating in conjunction with the new pit.*

**Response:** Rehabilitation of the existing Shelburne Pit is underway. The Shelburne Pit will continue to be progressively rehabilitated as the Melancthon Pit is opened. The Shelburne Pit and Melancthon Pit will operate in conjunction with each other over a transition period. The rehabilitation of the Shelburne Pit will be completed when it is depleted.



18. What measures are in place to ensure that rehabilitation occurs and that Strada just doesn't deplete the pit and leave or leave 10% of the aggregate which means they don't have to rehabilitate at all.

**Response:** See above response to question #17. If an ARA license is revoked The Ontario Aggregate Resources Corporation (TOARC) administers a fund that is available for rehabilitation where the licensee has not completed the required rehabilitation.

19. Does Strada have a representative on the Aggregate Resources Trust?

**Response:** No.

20. Is Strada a member of the Ontario Sand and Gravel Association?

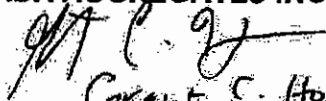
**Response:** Yes.

21. Also, just to confirm you called the other day and advised me that the tax rate on the Strada lands is Extractive Industrial M2. In fact that is your zoning, NOT the tax rate. Can you please advise me what tax rate Strada pays for their current operation?

**Response:** Strada to advise tax rate.

We trust the above addresses your comments. Should you have any additional comments or questions, please do not hesitate to contact us.

Yours truly,  
**STRADA AGGREGATES INC.**

  
Grant C. Horan

Cc: Mario Pietrolungo

Cc: Denise Holmes (Township of Melancthon)

**Denise Holmes, AMCT**

**From:** JOHN LEVER [jlever@sympatico.ca]  
**Sent:** Sunday, September 05, 2010 2:55 PM  
**To:** Denise Holmes, AMCT  
**Subject:** Objection to OPA17, under the Planning Act (ammended)  
 Objection to OPA17, under the Planning Act (ammended)

From: jlever@sympatico.ca  
 Subject:  
 Date: Sun, 4 Sep 2010

Sept. 4, 2010

Please Consider this as an Objection to Stradas Application for a license under the Aggregate Resources Act, and/or the Planning Act

**Introduction:**

Quarry applications are happening all around us. What we need is to have Government enforce the AEMOT recommendations. That's it! Then there would be no more Developers forcing OMB hearings who are able to fund 'experts' to support their applications. Finally our water and farmland would be protected. This protection could be legislated under the Green Belt Legislation. Aboriginals could be hired as by-law Enforcement officers. (We don't even have a By-law enforcement officer for Melancthon) Bedrock, sand & gravel extraction would be restricted to non-source water areas, and non-prime agricultural lands.

It's that simple!!!!

Rather than Government enforcing the AEMOT recommendations, both our water and farmland are being devoured by development. Amendment No. 17 to Melancthon's Official Plan August 2010 must not be signed by Melancthon Council, until the next twenty-two concerns have been resolved.

**Concern One:**

Monitoring of Stradas existing pit is not adequate.

A letter from Bluewater Geosciences, dated May 17, 2010 reinforces the lack of monitoring. "We have raised issues yearly with Strada and no action has been taken to remedy these deficiencies...Despite this situation, Strada's consultants continue to make assumptions based on the inadequate monitoring network".

Strada has not properly monitored the lowering of water levels in the water table, which can only be addressed in a Cumulative Water Taking report. They have only included a Seasonal Water flow chart, with higher levels during the spring. If the Ministry of Natural Resources is monitoring Strada's site plan controls, then they receive a failing grade.

The MNR according the Strada at the open house "allowed Strada to erect a berm as a minor amendment to the site plan regulations without informing anyone and without approval in our Official Plan."

**Conclusion One:**

If MNR is indeed monitoring Strada, the existing monitoring program is not working. Who monitors the MNR? Melancthon Council should not endorse Amendment #17, until proper

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monitoring is performed on Stradas existing pit operation.

**Concern Two:**

In 2002, a concern was raised by the Township's Hydro- geologist on the quality and quantity of groundwater for Amendment #13. These concerns are now part of Amendment 17.

"A number of concerns about groundwater, in terms of such elements as potential adverse impacts on the quantity and quality of water in area wells and the potential for groundwater pollution through spills or on-site activities, were raised by the Township's Hydro- geologist."

**Conclusion Two:**

Yearly monitoring reports from Strada's original pit are not available for public review. Were they done, and if so, where are they now? What do they show regarding water quality and quantity?

Seven years of poor monitoring has led to many unresolved problems with the existing Strada extraction operation. Melancthon's water has been impacted in quality and quantity, a possible spill occurred at the Strada pit, and area wells allegedly did dry up, and some of those negatively affected got bought out and left. Without monitoring by independent operators, then results are not without doubt.

**Concern Three:**

There has been no Aboriginal Consultation at the beginning of the Strada expansion application. This is in violation of the Official Plan rules and regulations.

**Conclusion Three:**

The Strada application must be started over to include Aboriginal consultation, and neighbor notification. Further extraction and berming of the Strada expansion pit should be stopped until the newly elected Council has time to make informed planning decisions.

**Concern Four:**

Human bones have been found on the St. Mary's CBM property. These bones were sent to Guelph university for a more thorough investigation. This should have triggered a full-scale archeological dig. What are the report findings on these bones?

**Conclusion Four:**

Native burial grounds are at the base of a forested area. Since trees were removed between Strada and CBM's pit, a Native Burial ground may have been compromised. Natives believe that the spirits of the dead enter the trees. Then, they make masks out of these trees for their ceremonies. If the go ahead was given by MOE, then they should be charged and forced to pay for an archeological investigation. This reminds me of Highlands. They demolished, burned and buried over 20 heritage homes in our Prime agricultural lands, with little regard for our culture, heritage, or history. Now we will never have a historical record of these properties.

**Concern Five:**

The 2002 OP Amendment 13 document called for the protection of the wooded area, why is it not protected in OP Amendment 17? "The wooded area not to be excavated"

**Conclusion Five:**

With the removal of trees between Strada and St. Mary's Cement, Strada did not follow OP Amendment 13 "The wooded area not to be excavated". What are the consequences, if any to Strada?

**Concern Six:**

It is important that a recorded vote be taken regarding approval of Amendment 17, so the minutes will reflect

the position of each member of Melancthon Council.

**Conclusion Six:**

Only in this way will those not in attendances know how each member of Council voted on Sept. 23, 2010.

**Concern Seven:**

The Melancthon 1979 Official Plan is not available on the Melancthon Township website for public review and/or comment. If our current OP were available for public review, you would see all the OS2 Open Space Conservation Areas, which protect Melancthon's Headwaters, have been removed in the Draft 2010 Melancthon Official Plan. Will Amendment #17 set a precedent, where "**OS2**" water protection zones can be changed into "**OS2-1 Zone**" (**Open Space Conservation Exception**), allowing not only fences and berms but industrial wind turbines? Melancthon is the "M" in AEMOT. This report detailed how our water is to be protected in the "Roof of Ontario". This report has been ignored since OS2 protection for our water is removed, and cumulative water taking is not being properly monitored. The Strada pit has one area where the water level is below the water table. Is this a potential entrance for siltation and contamination to our karst underground water? How much water will be used per day at Strada's Draft new quarry wash plant? How will this be monitored?

*"The subject property lies near the drainage divide of two major watersheds in southern Ontario, the Nottawasaga River and the Grand River. The property is within the watershed of the Nottawasaga River and is in proximity to two of the headwater systems of the Nottawasaga River, the Pine River and the Boyne River subwatersheds. The Nottawasaga River watershed flows east and north emptying in Georgian Bay and Lake Huron. The watershed boundary with the Grand River is west of the property, and flows south to Lake Erie."(Natural Resources Solutions pg.2)*

*"Central Melancthon was mapped as a candidate Groundwater Protection Area, because of its porous granular deposits over the fractured dolostone bedrock, of the Guelph-Amable aquifer and the downstream coldwater trout habitat" (Amendment #13 p.4)*

**Conclusion Seven:**

If a Precedent is set allowing Strada to replace OS2 with OS2-1, for all land use in Schedule A, Amendment 17 not only will impact Strada's application, but may have far reaching consequences to our Draft 2010 Official Plan. Rather than water and soil being protected under OS2, water may no longer be protected as a Groundwater Protection Area, and the chance for "Specialty Crop" or "Greenbelt Inclusion" will be removed. Instead Open Space Conservation Exception will allow for wind turbines, fences and berms. Amendment #17, may affect our Draft 2010 Melancthon OP, by gradually transforming North Dufferin Prime Agricultural Lands into both sand-gravel extraction, and bedrock extraction.

**Concern Eight:**

How can the Draft 17 Amendment state that "Melancthon Council is in agreement with the report", when the results of public input and the Statutory meeting have not yet been held?

***"And Whereas the Council of the Corporation of the Township of Melancthon has received a request to amend By-law 12-79 as amended, and is in agreement with the report".***

**Conclusion Eight:**

Melancthon Council should not sign Draft 17 Amendment until all public comment and concern have been properly evaluated.

**Concern Nine:**

The Environmental report prepared by "Natural Resource Solutions Inc.", Aquatic, Terrestrial and Wetland Biologists did not include a number of endangered and threatened species in this area. Also the Azimuth

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report has not been released to determine a connection between on site and off site wetlands. To resolve this problem, additional investigations and reports are needed, before proceeding with the application.

***“Through consultation with the NVCA and NRSI analysis, it was determined that although wetlands on and adjacent to the site were **unevaluated**, they would be treated as provincially significant, thereby triggering the need for the NEA Level 2 Assessment”***

***“Further analysis of the relationship between wetlands on-site and off-site is also required by NVCA. At this point, I would recommend that we assume that the wetland off-site is significant. An analysis of the on-site wetland areas can be undertaken according to the Ontario Wetland Evaluation System to determine if they would qualify for inclusion in the larger wetland complex, and therefore be considered significant as well. We will work with Azimuth to determine the hydrologic connection between the water table on-site and the off-site wetlands and to determine potential impacts arising from the excavation”(p.2-Natural Resource Solutions Inc. Sept.14,2008)***

#### **Conclusion Nine:**

Since there has been no cumulative water taking study done, and wetlands were unevaluated, and four season monitoring was not done in the vicinity of the first Strada pit, and the monitoring and results of the Azimuth’s report are not completed--requesting a pit expansion at this time is premature, and does not allow enough time to do the proper four season monitoring for both Strada pit operations.

#### **Concern Ten:**

Prime and Specialty Crop land is in limited supply in our Province. Have non-prime agricultural lands been thoroughly investigated for their aggregate extraction potential, or is the continual decline of Prime farmland through sod farming, and sand and gravel extraction the vision our Melancthon Council sees as their contribution to our 150 year farming heritage, and their legacy to future generations?

#### **Conclusion Ten:**

Aggregate operations should be stopped in potential specialty croplands, and Prime Agricultural Lands.

#### **Concern Eleven:**

The OS2 mapping in Amendment 17 and in the various versions of G.W. Jordan’s 1979 Melancthon Official Plans, are not consistent. The protected area OS2 keeps changing shape, with no Official Plan Amendments allowing these changes. How can OS2 areas follow straight lines, such as roads?

#### **Conclusion Eleven:**

Our current 1979 Official Plan must be put on the Township of Melancthon Website, along with a map showing the original 1979 Melancthon Official Plan. I have checked through the Amendments to the Official Plan, and there is no application or approval to change the OS2 zones, other than the Draft Amendment 17, which should not be passed as is.

#### **Concern Twelve:**

Truck traffic at Strada original pit is up to 160 loads or 320 trips per day during peak activity periods. The haul route is south down concession road 4, east on county road 17 and South on County Road 124. (p.5 Amendment 13) Strada;s second pit is drafted to allow 1,250,000 tones per year of extraction. This means an additional 350 trips per day, or a total of 640 trips with two Strada pits in operation.

#### **Conclusion Twelve:**

Keep in mind there are other aggregate companies in operation. If they all have 350 truck trips per day that is 350X5=1,750 truck trips per day. This is absurd!

Q: What is the maximum number of truck trips per day from each sand and gravel operation in Melancthon?

Q: How can the statement: “No significant increase in traffic as a result of the proposed pit” possibly be true?

What is meant by "significant"?

**Concern Thirteen:**

The haul route on the Draft 2010 OP plan is not evident. However Amendment 10, May 1991 shows the completed haul routes.

**Conclusion Thirteen:**

Until all haul routes are clearly marked, then there should be no approval of Amendment 17.

Q: Why are the haul routes not part of either the Draft 2010 Melancton Official Plan, or the Amendment 17 Strada application?

**Concern Fourteen:**

Strada's existing pit operation has been in operation from 2002 until 2009, which is seven years. They were permitted to extract 1,250,000 tonnes of material per year. If Strada has extracted the maximum amount of material allowed, then they will have extracted  $1,250,000 \times 7 \text{ years} = 8,850,000$  tonnes. The total aggregate available in the pit is 9,700,000 tonnes. This means that there is only enough aggregate for less than one years operation,  $9,700,000 - 8,850,000 = 850,000$  tonnes.

*"Reserves in that pit have been depleted and the proposed extractive industrial use is intended to initially supplement and then replace the pit."*

**Conclusion Fourteen:**

If Strada is to continue at their current rate of sand and gravel extraction, every seven years, another 100 acres of prime agricultural land will be needed. Gradually over the years, much of our prime agricultural land will be devoured, and turned into a lower grade of agricultural lands, or not rehabilitated at all. Currently there is no long term vision statement on the part of Melancton Council for this township. Everything should be halted, until this is addressed. Keep in mind that Strada is not the only sand and gravel extraction operation in Melancton. Nelson Arnold (recently bought by Davenport), St. Mary's Cement (CBM), and Greenwood Construction Hannon Pit are all currently extracting sand and gravel. I looked through the Amendments and could not find Official Plan Amendments for their operations. There is a pending application from Highlands to extract 2,500 acres of bedrock limestone. In fact, the Draft Melancton OP has two-thirds of Melancton Township transformed into extraction, in Prime Specialty Crop Lands, Source Water Region.

**Concern Fifteen:**

OPA 13 on p. 8 appears to have been an "F" and changed to an "E" overlay layer when there were no overlay designations in 2003.

**Conclusion Fifteen:**

In 2003 there was no overlay designation for bedrock or sand and gravel, it was all included on one map. Why then is there reference to a "E" (F) layer in OPA No. 13?

**Concern Sixteen:**

I asked at the Strada open house if James Dick was putting in a batching plant (portable cement mixing plant), as he had previously done for Canadian Hydro Developers, when he supplied 40 ready mix trucks per base for the 136 turbines (114 1.5 MW turbines in Melancton, 22 1.5 MW turbines in Amaranth)? I did not receive a definite answer. There is no reference to a Batching plant in the Strada 17 amendment. Instead it lists "2 portable crushing plants, one screening plant, one wash plant and four loaders."

**Conclusion Sixteen:**

Since Strada already has a washing plant in their original pit location, and the peer review questioned the need for a second washing plant operation, has Strada decided to remove their request for a second washing plant? This must be clarified. If the gravel is nearly depleted in the existing pit, then the washing plant in the original Strada location will not be needed. When is it scheduled for dismantling?

**Concern Seventeen:**

Under Cultural Heritage, three things have not yet been completed as recommended.

"The recommendation for a full documentation of the agricultural building complexes and residence before removal."

"A Stage 3 assessment is required for a small part of the site."

"The relocation of an orchard."

**Conclusion Seventeen:**

Cultural Heritage matters must be resolved before signing OP Amendment 17.

**Concern Eighteen:**

Aeracoustics stated the noise levels are "satisfactory".

**Conclusion Eighteen:** Where are the DBA, infrasound, day vs night, four season monitoring results? How does one quantify "Satisfactory".

**Concern Nineteen:**

OP Amendment 17 states "General Compliance with the applicable policies of the Township Official plan." This comment does not specify who was making this determination, and what areas were in compliance, and which areas were not in compliance.

**Conclusion Nineteen:**

Since Melancthon's Official Plan is from 1979, and is 95% agriculture based, and since our Draft 2010 Official Plan has not yet been approved, how can this statement have any meaning?

**Concern Twenty:**

OP Amendment 17 stated that "74% of the site would be returned to agricultural lands" during rehabilitation. This makes no sense! By removing the Class One and Two Soils and creating berms, then the living soil is killed if piled greater than 1.5 metres. The soil will never be mitigated back to its current quality or quantity as Prime Agricultural Land.

**Conclusion Twenty:**

Since the Peer Review "generally supported" the findings of the applicants study. This means that the Peer Review supported some findings and did not support some findings. What are the details? This is too vague. Who did the peer review? What are their qualifications?

**Concern Twenty-one:**

Microorganisms and nitrates can contaminate the bedrock aquifer since the filtering silt layer will be removed during sand and gravel extraction. This contradicts Strada's statement:

"Proposed use would have no significant impact on groundwater or surface water."

**Conclusion Twenty-one:**

What is to prevent the introduction of microorganisms and nitrates at the settling pond, since it is the one spot below the water table?

**Concern Twenty-two:**

As a Headwaters region feeding seven major rivers (N-Pine, Mad, Noisy; E-Pine, Boyne, Nottawasaga S-Grand, W-Saugeen) in Prime #1 Agricultural Land, why is Council allowing the proliferation of Extraction operations over the protection of Melancthon's water and soil, as outlined in the Greenbelt Expansion Documentation?

**Conclusion Twenty-two:**

Melancthon Council should focus on how to incorporate Melancthon into the Greenbelt, based on Specialty Cropland, since Melancthon is part of the AEMOT Headwaters region. Due to the importance of Melancthon's natural resources, groundwater monitoring, well records, and spill/contamination sites should be constantly updated, and available on the Township website for public review.

**Final Comments:**

Melancthon Council should not approve Amendment 17 prior to the election, due to the twenty-two unresolved concerns I have listed. . Let the newly elected Council have the opportunity to review the concerns I have listed, and incorporate proper monitoring prior to any further OP Amendments. There are many issues that need attention before anyone signs anything. Will unmonitored extraction lead to the destruction of Melancthon's cultural, historical, aboriginal, farming headwaters region for the sake of shareholder profits in the mining and wind sectors? Government must question facilitating this destruction through Certificates of Approval, without knowing all the facts.

-  
Sincerely,  
Joan Lever,

625391, 15th sideroad  
RR #2,  
Shelburne, ON  
L0N-1S6  
519-925-3692  
[jlever@sympatico.ca](mailto:jlever@sympatico.ca)

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Total Control Panel

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To: [dholmes@melancthontownship.ca](mailto:dholmes@melancthontownship.ca) [Remove this sender from my allow list](#)

From: [jlever@sympatico.ca](mailto:jlever@sympatico.ca)

*You received this message because the sender is on your allow list.*

9/7/2010

**Denise Holmes, AMCT**

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**From:** JOHN LEVER [jlever@sympatico.ca]

**Sent:** Saturday, September 04, 2010 11:14 AM

**To:** dfawcett@melanctontownship.ca; Denise Holmes, AMCT; bhill@melanctontownship.ca; jcrowe@melanctontownship.ca; jelliott@melanctontownship.ca; dwhite@melanctontownship.ca; mpietrolungo@strada-aggregates.com; diane.schwier@ontario.ca

Township of Melancthon

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Shelburne, Ontario

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**CAO/Clerk-Treasurer:** Denise B. Holmes

Denise Holmes, AMCT([dholmes@melanctontownship.ca](mailto:dholmes@melanctontownship.ca))

**Mayor Debbie Fawcett** (519)-925-6293

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**Deputy Mayor Bill Hill** (519) 925-5264

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[bhill@melanctontownship.ca](mailto:bhill@melanctontownship.ca)

**Councillor John Crowe** (519) 925-6069

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[jcrowe@melanctontownship.ca](mailto:jcrowe@melanctontownship.ca)

**Councillor Janice Elliott** (519) 923-3803

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[jelliott@melanctontownship.ca](mailto:jelliott@melanctontownship.ca)

**Councillor Darren White** (519) 923-2829

682378 260 Sideroad, Box 36

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[dwhite@melanctontownship.ca](mailto:dwhite@melanctontownship.ca)

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E-mail: [mpiетrolungo@strada-aggregates.com](mailto:mpiетrolungo@strada-aggregates.com)

MNR-Ministry of Natural Resources

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Guelph, ON N1G 4Y2

E-mail: [diane.schwier@ontario.ca](mailto:diane.schwier@ontario.ca)

Sept. 4, 2010

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9/7/2010

SEP 23 2010

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Seven years of poor monitoring has led to many unresolved problems with the existing Strada extraction operation. Melancthon's water has been impacted in quality and quantity, a possible spill occurred at the Strada pit, and area wells allegedly did dry up, and some of those negatively affected got bought out and left. Without monitoring by independent operators, then results are not without doubt.

**Concern Three:**

There has been no Aboriginal Consultation at the beginning of the Strada expansion application. This is in

violation of the Official Plan rules and regulations.

**Conclusion Three:**

The Strada application must be started over to include Aboriginal consultation, and neighbor notification. Further extraction and berming of the Strada expansion pit should be stopped until the newly elected Council has time to make informed planning decisions.

**Concern Four:**

Human bones have been found on the St. Mary's CBM property. These bones were sent to Guelph university for a more thorough investigation. This should have triggered a full-scale archeological dig. What are the report findings on these bones?

**Conclusion Four:**

Native burial grounds are at the base of a forested area. Since trees were removed between Strada and CBM's pit, a Native Burial ground may have been compromised. Natives believe that the spirits of the dead enter the trees. Then, they make masks out of these trees for their ceremonies. If the go ahead was given by MOE, then they should be charged and forced to pay for an archeological investigation. This reminds me of Highlands. They demolished, burned and buried over 20 heritage homes in our Prime agricultural lands, with little regard for our culture, heritage, or history. Now we will never have a historical record of these properties.

**Concern Five:**

The 2002 OP Amendment 13 document called for the protection of the wooded area, why is it not protected in OP Amendment 17? "The wooded area not to be excavated"

**Conclusion Five:**

With the removal of trees between Strada and St. Mary's Cement, Strada did not follow OP Amendment 13 "The wooded area not to be excavated". What are the consequences, if any to Strada?

**Concern Six:**

It is important that a recorded vote be taken regarding approval of Amendment 17, so the minutes will reflect the position of each member of Melancthon Council.

**Conclusion Six:**

Only in this way will those not in attendances know how each member of Council voted on Sept. 23, 2010.

**Concern Seven:**

The Melancthon 1979 Official Plan is not available on the Melancthon Township website for public review and/or comment. If our current OP were available for public review, you would see all the OS2 Open Space Conservation Areas, which protect Melancthon's Headwaters, have been removed in the Draft 2010 Melancthon Official Plan. Will Amendment #17 set a precedent, where "**OS2**" water protection zones can be changed into "**OS2-1 Zone**" (**Open Space Conservation Exception**), allowing not only fences and berms but industrial wind turbines? Melancthon is the "M" in AEMOT. This report detailed how our water is to be protected in the "Roof of Ontario". This report has been ignored since OS2 protection for our water is removed, and cumulative water taking is not being properly monitored. The Strada pit has one area where the water level is below the water table. Is this a potential entrance for siltation and contamination to our karst underground water? How much water will be used per day at Strada's Draft new quarry wash plant? How will this be monitored?

*"The subject property lies near the drainage divide of two major watersheds in southern Ontario, the Nottawasaga River and the Grand River. The property is within the*

*watershed of the Nottawasaga River and is in proximity to two of the headwater systems of the Nottawasaga River, the Pine River and the Boyne River subwatersheds. The Nottawasaga River watershed flows east and north emptying in Georgian Bay and Lake Huron. The watershed boundary with the Grand River is west of the property, and flows south to Lake Erie.”(Natural Resources Solutions pg.2)*

*“Central Melancthon was mapped as a candidate Groundwater Protection Area, because of its porous granular deposits over the fractured dolostone bedrock, of the Guelph-Amable aquifer and the downstream coldwater trout habitat” (Amendment #13 p.4)*

#### Conclusion Seven:

If a Precedent is set allowing Strada to replace OS2 with OS2-1, for all land use in Schedule A, Amendment 17 not only will impact Strada’s application, but may have far reaching consequences to our Draft 2010 Official Plan. Rather than water and soil being protected under OS2, water may no longer be protected as a Groundwater Protection Area, and the chance for “Specialty Crop” or “Greenbelt Inclusion” will be removed. Instead Open Space Conservation Exception will allow for wind turbines, fences and berms. Amendment #17, may affect our Draft 2010 Melancthon OP, by gradually transforming North Dufferin Prime Agricultural Lands into both sand-gravel extraction, and bedrock extraction.

#### Concern Eight:

How can the Draft 17 Amendment state that “Melancthon Council is in agreement with the report”, when the results of public input and the Statutory meeting have not yet been held?

*“And Whereas the Council of the Corporation of the Township of Melancthon has received a request to amend By-law 12-79 as amended, and is in agreement with the report”.*

#### Conclusion Eight:

Melancthon Council should not sign Draft 17 Amendment until all public comment and concern have been properly evaluated.

#### Concern Nine:

The Environmental report prepared by “Natural Resource Solutions Inc.”, Aquatic, Terrestrial and Wetland Biologists did not include a number of endangered and threatened species in this area. Also the Azimuth report has not been released to determine a connection between on site and off site wetlands. To resolve this problem, additional investigations and reports are needed, before proceeding with the application.

*“Through consultation with the NVCA and NRSI analysis, it was determined that although wetlands on and adjacent to the site were **unevaluated**, they would be treated as provincially significant, thereby triggering the need for the NEA Level 2 Assessment”*

*“Further analysis of the relationship between wetlands on-site and off-site is also required by NVCA. At this point, I would recommend that we assume that the wetland off-site is significant. An analysis of the on-site wetland areas can be undertaken according to the Ontario Wetland Evaluation System to determine if they would qualify for inclusion in the larger wetland complex, and therefore be considered significant as well. We will work with Azimuth to determine the hydrologic connection between the water table on-site and the off-site wetlands and to determine potential impacts arising from the excavation”(p.2-Natural Resource Solutions Inc. Sept.14,2008)*

#### Conclusion Nine:

Since there has been no cumulative water taking study done, and wetlands were unevaluated, and four season monitoring was not done in the vicinity of the first Strada pit, and the monitoring and results of the Azimuth’s report are not completed--requesting a pit expansion at this time is premature, and does not allow enough time to do the proper four season monitoring for both Strada pit operations.

#### Concern Ten:

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Prime and Specialty Crop land is in limited supply in our Province. Have non-prime agricultural lands been thoroughly investigated for their aggregate extraction potential, or is the continual decline of Prime farmland through sod farming, and sand and gravel extraction the vision our Melancthon Council sees as their contribution to our 150 year farming heritage, and their legacy to future generations?

**Conclusion Ten:**

Aggregate operations should be stopped in potential specialty croplands, and Prime Agricultural Lands.

**Concern Eleven:**

The OS2 mapping in Amendment 17 and in the various versions of G.W. Jordan's 1979 Melancthon Official Plans, are not consistent. The protected area OS2 keeps changing shape, with no Official Plan Amendments allowing these changes. How can OS2 areas follow straight lines, such as roads?

**Conclusion Eleven:**

Our current 1979 Official Plan must be put on the Township of Melancthon Website, along with a map showing the original 1979 Melancthon Official Plan. I have checked through the Amendments to the Official Plan, and there is no application or approval to change the OS2 zones, other than the Draft Amendment 17, which should not be passed as is.

**Concern Twelve:**

Truck traffic at Strada original pit is up to 160 loads or 320 trips per day during peak activity periods. The haul route is south down concession road 4, east on county road 17 and South on County Road 124. (p.5 Amendment 13) Strada's second pit is drafted to allow 1,250,000 tonnes per year of extraction. This means an additional 350 trips per day, or a total of 640 trips with two Strada pits in operation.

**Conclusion Twelve:**

Keep in mind there are other aggregate companies in operation. If they all have 350 truck trips per day that is  $350 \times 5 = 1,750$  truck trips per day. This is absurd!

Q: What is the maximum number of truck trips per day from each sand and gravel operation in Melancthon?

Q: How can the statement: "No significant increase in traffic as a result of the proposed pit" possibly be true? What is meant by "significant"?

**Concern Thirteen:**

The haul route on the Draft 2010 OP plan is not evident. However Amendment 10, May 1991 shows the completed haul routes.

**Conclusion Thirteen:**

Until all haul routes are clearly marked, then there should be no approval of Amendment 17.

Q: Why are the haul routes not part of either the Draft 2010 Melancthon Official Plan, or the Amendment 17 Strada application?

**Concern Fourteen:**

Strada's existing pit operation has been in operation from 2002 until 2009, which is seven years. They were permitted to extract 1,250,000 tonnes of material per year. If Strada has extracted the maximum amount of material allowed, then they will have extracted  $1,250,000 \times 7 \text{ years} = 8,850,000$  tonnes. The total aggregate available in the pit is 9,700,000 tonnes. This means that there is only enough aggregate for less than one years operation,  $9,700,000 - 8,850,000 = 850,000$  tonnes.

*"Reserves in that pit have been depleted and the proposed extractive industrial use is intended to*

*initially supplement and then replace the pit.”*

**Conclusion Fourteen:**

If Strada is to continue at their current rate of sand and gravel extraction, every seven years, another 100 acres of prime agricultural land will be needed. Gradually over the years, much of our prime agricultural land will be devoured, and turned into a lower grade of agricultural lands, or not rehabilitated at all. Currently there is no long term vision statement on the part of Melancthon Council for this township. Everything should be halted, until this is addressed. Keep in mind that Strada is not the only sand and gravel extraction operation in Melancthon. Nelson Arnold (recently bought by Davenport), St. Mary's Cement (CBM), and Greenwood Construction Hannon Pit are all currently extracting sand and gravel. I looked through the Amendments and could not find Official Plan Amendments for their operations. There is a pending application from Highlands to extract 2,500 acres of bedrock limestone. In fact, the Draft Melancthon OP has two-thirds of Melancthon Township transformed into extraction, in Prime Specialty Crop Lands, Source Water Region.

**Concern Fifteen:**

OPA 13 on p. 8 appears to have been an "F" and changed to an "E" overlay layer when there were no overlay designations in 2003.

**Conclusion Fifteen:**

In 2003 there was no overlay designation for bedrock or sand and gravel, it was all included on one map. Why then is there reference to a "E" (F) layer in OPA No. 13?

**Concern Sixteen:**

I asked at the Strada open house if James Dick was putting in a batching plant (portable cement mixing plant), as he had previously done for Canadian Hydro Developers, when he supplied 40 ready mix trucks per base for the 136 turbines (114 1.5 MW turbines in Melancthon, 22 1.5 MW turbines in Amaranth)? I did not receive a definite answer. There is no reference to a Batching plant in the Strada 17 amendment. Instead it lists "2 portable crushing plants, one screening plant, one wash plant and four loaders."

**Conclusion Sixteen:**

Since Strada already has a washing plant in their original pit location, and the peer review questioned the need for a second washing plant operation, has Strada decided to remove their request for a second washing plant? This must be clarified. If the gravel is nearly depleted in the existing pit, then the washing plant in the original Strada location will not be needed. When is it scheduled for dismantling?

**Concern Seventeen:**

Under Cultural Heritage, three things have not yet been completed as recommended.

1. "The recommendation for a full documentation of the agricultural building complexes and residence before removal."
2. "A Stage 3 assessment is required for a small part of the site."
3. "The relocation of an orchard."

**Conclusion Seventeen:**

Cultural Heritage matters must be resolved before signing OP Amendment 17.

**Concern Eighteen:**

Aeracoustics stated the noise levels are "satisfactory".

**Conclusion Eighteen:** Where are the DBA , infrasound, day vs night, four season monitoring results? How does one quantify "Satisfactory".

**Concern Nineteen:**

OP Amendment 17 states "General Compliance with the applicable policies of the Township Official plan." This comment does not specify who was making this determination, and what areas were in compliance, and which areas were not in compliance.

**Conclusion Nineteen:**

Since Melancthon's Official Plan is from 1979, and is 95% agriculture based, and since our Draft 2010 Official Plan has not yet been approved, how can this statement have any meaning?

**Concern Twenty:**

OP Amendment 17 stated that "74% of the site would be returned to agricultural lands" during rehabilitation. This makes no sense! By removing the Class One and Two Soils and creating berms, then the living soil is killed if piled greater than 1.5 metres. The soil will never be mitigatd back to its current quality or quantity as Prime Agricultural Land.

**Conclusion Twenty:**

Since the Peer Review "generally supported" the findings of the applicants study. This means that the Peer Review supported some findings and did not support some findings. What are the details? This is too vague. Who did the peer review? What are their qualifications?

**Concern Twenty-one:**

Microorganisms and nitrates can contaminate the bedrock aquifer since the filtering silt layer will be removed during sand and gravel extraction. This contradicts Strada's statement: "Proposed use would have no significant impact on groundwater or surface water."

**Conclusion Twenty-one:**

What is to prevent the introduction of microorganisms and nitrates at the settling pond, since it is the one spot below the water table?

**Concern Twenty-two:**

As a Headwaters region feeding seven major rivers (N-Pine, Mad, Noisy; E-Pine, Boyne, Nottawasaga S-Grand, W-Saugeen) in Prime #1 Agricultural Land, why is Council allowing the proliferation of Extraction operations over the protection of Melancthon's water and soil, as outlined in the Greenbelt Expansion Documentation?

**Conclusion Twenty-two:**

Melancthon Council should focus on how to incorporate Melancthon into the Greenbelt, based on Specialty Cropland, since Melancthon is part of the AEMOT Headwaters region. Due to the importance of Melancthon's natural resources, groundwater monitoring, well records, and spill/contamination sites should be constantly updated, and available on the Township website for public review.

**Final Comments:**

Melancthon Council should not approve Amendment 17 prior to the election, due to the twenty-two unresolved concerns I have listed. . Let the newly elected Council have the opportunity to review the concerns I have listed, and incorporate proper monitoring prior to any further OP Amendments. There are many issues

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that need attention before anyone signs anything. Will unmonitored extraction lead to the destruction of Melancthon's cultural, historical, aboriginal, farming headwaters region for the sake of shareholder profits in the mining and wind sectors? Government must question facilitating this destruction through Certificates of Approval, without knowing all the facts.

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Sincerely,  
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