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Subject:
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To The Mayor and Members of Council of The Corporation of the Township of Brock.
June 25, 2023 10:56:03 PM

To The Mayor and Members of Council of The Corporation of the Township of Brock.

Regarding the Zoning By-law Amendment (11-2022-RA) Application, CBM Sunderland - Recommendation Report No 2023

Referring to the Summary of Public Comments and Township Response

This does not adequately address the many concerns of residents expressed and documented since September 2021 and in the 62 signature petition.

- In the decision to recommend zoning change from rural to extractive industrial, the factors weighed relate to land use planning process, planning principles and context Provincial, Regional and local, clearly a desk exercise, knowing it will adversely effect residents. It is disappointing that the Township planning approach has not adopted a more holistic approach towards residents, their concerns and the unique nature of this rural community.
- The concern of residents is that this large scale gravel creep operation is planned too close to homes and as in the North pit a previously rehabilitated area such as the current south pit may ultimately end up amalgamated in one large lake such is the greed for gravel.
- Also with extraction occurring in the Highly Vulnerable Aquifer the source of potable water for many surrounding wells could be easily exposed to contamination from aggregate extraction activities going 12 meters below water.
- It is noted that Staff recommends “The well water complaint protocol should be revised to require that the Township should also be notified in the event of a complaint.
- CBM response plan includes a cistern water supply to an effected well which could be problematic in the winter.
- Therefore the recommendation to approve the zoning By-law should not go forward until the Township has a protocol in place to adequately respond in the event of a complaint.
- The Planning Act provides for the protection of Public Health and Safety.
- With as many as 60-70 large gravel trucks daily entering and leaving the site, dust containing silica will be carried by wind into the forest, wetlands and surrounding neighbourhood where all residents are at risk, young children especially.
- It takes minute amounts of silica to lodge in lung tissue and over time this remains a risk despite the Township claims otherwise.
- These clouds of dust and noise of rocks slamming into the trucks box from the excavator were observed often and brought to CBM’s attention previously when the South site was operating.
- Now this proposed operation will come much closer to surrounding residents with the potential to affect health, restrict enjoyment of property, and way of life.
- It is our experience having lived with the South pit operation,that the protection a berm

provides is limited and during establishment it is disruptive to residents living in close proximity due to noise and visibility of heavy machinery with the presence of dust and dirt carried by winds until the vegetation establishes which can take months.

- The fact remains that technical reports and studies were carried out by qualified professionals, members of OSSGA (Ontario Sand and Gravel Association) a clear conflict of interest despite being bound by a professional code of conduct as stated in the Township

- Property values are significantly effected by 25 to 30 percent and Township response is missing but no problem increasing already high taxes on surrounding residents.

- With regard to rehabilitation, we are well aware of the points in the Township response and view it with skepticism. As stated in the petition.

“ Even the best efforts at rehabilitation simply cannot replace a lost ecosystem. We do not have the ability to replace the significant and complex microbial biodiversity which exists in healthy soil. We have neither the understanding nor the technology to recreate an established ecosystem and while, with a start from humans the ecosystem may eventually repair itself this can take centuries to be fully realized .

- The Township’s response is just wrong with regard to agricultural lands and indicates the willingness to accept without question erroneous claims presented by the applicant. According to the Canada Land Inventory the land is not Class 6 - the soils in this class are unsuited for cultivation but capable for use for unimproved pasture. This area has grown a flourishing crop of Soy for several years and qualifies as Class 1 or 2, moderately high to high in productivity.

-We are not convinced that CBM will effectively manage potential impacts to the ecosystem especially during spring melt and wild weather


How often will erosion and sediment control be reviewed/maintained? With respect to the fencing between the extraction area and the EP and PSW. This was not answered in Township comments.

-There are in my opinion, unsubstantiated unscientific claims related to the rehabilitation plan ,including a questionable claim that the plan will produce a net ecological gain., It will be a long time before fish can live in the silty, mineral blue waters of the ponds.

It is stretching credulity to state that the plan will be better from a carbon perspective than the current “agricultural pastureland” Again I point out that currently this land supports a healthy crop of Soy and has for several years.

These erroneous statements make it clear that the planners should leave their desks and come and view the Rural area they recommend to be zoned Industrial Extractive.

Respectfully,

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Also I wish to be advised when a decision is made with regard to this Zoning By-law.

