



130 Balm Beach Road West  
Tiny, Ontario L0L 2J0  
(705) 526-4204 | 1-866-939-8469  
[www.tiny.ca](http://www.tiny.ca)

December 3, 2020

Ministry of Natural Resources and Forestry  
2284 Nursery Road  
Midhurst, ON L9X 1N8  
Attention: Robert Herbst ([robert.herbst@ontario.ca](mailto:robert.herbst@ontario.ca))

CRH Canada Group Inc.  
2300 Steeles Avenue West, 4<sup>th</sup> Floor  
Concord, ON L4K 5X6  
Attention: Jessica Ferri ([Jessica.ferri@ca.crh.com](mailto:Jessica.ferri@ca.crh.com))

**RE: Aggregate Resource Act Application – Teedon Pit Extension  
Township of Tiny Updated Comments  
North Part of Lot 80, Concession 1 O.S. (Roll #1-029-00)**

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Thank you for the opportunity to provide updated comments on the proposed Teedon Pit Extension Application under the Aggregate Resources Act (ARA).

The Township submitted an objection letter dated March 25, 2019, on the ARA application. The letter focused on comments in the following areas: hydrogeological, traffic, noise, site operation, and natural heritage. The Township submitted a subsequent letter dated January 29, 2020.

The Township has been reviewing and commenting on all new submission material from the applicant in their effort to address the Township's objection comments. The Township has retained R. J. Burnside & Associates Limited (Burnside), Aercoustics Engineering Limited (Aercoustics), and the Severn Sound Environmental Association (SSEA) to peer review all technical material in support of the application.

Confidential Planning & Development Report PD-042-20 regarding the Teedon Pit Extension Application was presented to Council at the Committee of the Whole meeting held on November 30, 2020. This Report provides the background relative to the Township's review of the application and the current status of comments. As a result of this Report, Council Motion #339/20 was approved at the November 30, 2020 Council Meeting and reads:

**WHEREAS** the Committee of the Whole considered Confidential Planning and Development Report PD-042-20 regarding the Teedon Pit Extension – Aggregate Resource Act Application;

**AND WHEREAS** the matter was forwarded to the November 30, 2020 Regular Meeting of Council for formal approval due to its time sensitive nature;

**NOW THEREFORE BE IT RESOLVED THAT** staff be directed to proceed with the recommendations in PD-042-20;

**AND THAT** staff include the following comments in the letter to the Ministry of Natural Resources and Forestry and CRH Canada Group Inc.:

1. That the Township is fundamentally opposed to the extraction and washing of aggregate in environmentally sensitive areas.
2. That there is presently a groundwater study being undertaken by Dr. Cherry, et al and that the findings of this report be taken into consideration by the Province prior to the issuance of any further licenses.

**AND FURTHER THAT** Report PD-042-20, once approved, be made public in nature.

Council Motion 339/20 and Confidential Planning & Development Report PD-042-20 are attached to this letter for your information.

Although the majority of the Township's comments have been addressed, the Township is not satisfied that all traffic matters related to this proposal have been satisfactorily dealt with for the reasons stated in this letter.

### **TRAFFIC COMMENTS**

Burnside has completed a peer review of the Traffic Impact Study (TIS) prepared by C.F. Crozier & Associates Inc. (Crozier), dated October 4, 2019 and the Comment Response Memo, dated October 2, 2020, prepared Crozier.

The Township's concerns regarding traffic have not been addressed as follows:

- The Township requests that the CRH policies and procedures be expanded to add the following items:
  - a) commit to ongoing periodic monitoring of on-site and off-site operations, and reporting to the Township, to confirm that the provisions of the policies and procedures are being followed;
  - b) commit to address any future complaint issues, through acceptable mitigation measures; and
  - c) Quantify the number of infractions that are allowed, before driver suspension.

The policies refer to a 7 am opening time for the pit. The TIS had noted that shipping is being proposed commencing at 5 am. If the existing pit does not currently allow for shipping between 5 am and 7 am, then the impacts of such a time extension on area residents is not fully addressed by the policies and procedures outlined.

- The traffic counts that were used for the traffic operational analysis (i.e., Level of Service, Left Turn Lane Warrant analysis) do not capture the traffic from the Pit Extension. The peak hour counts on Darby Road do not show any heavy trucks during the peak hours analyzed. Considering that CRH has acknowledged that there have been 40 two-way truck trips during peak hours and that this will be the maximum in any given hour, the Township requested in the January 29, 2020 letter that a sensitivity analysis be provided in the TIS to consider this maximum. This may impact the external road improvements required on both Darby Road and Highway 93. The TIS proposes road widenings along Darby Road and a recovery taper along Highway 93 to facilitate turning movements at the intersection of Darby Road and Highway 93. The additional information provided by Crozier in their Memo dated October 2, 2020 does not satisfactorily address this concern. The Township maintains that a sensitivity analysis of these maximum volumes be completed, unless comments are provided by the MTO that this is not required.

- The TIS concludes that left turn lane warrants are not met on Highway 93, based on the low percentages of left turn movements at the intersection of Darby Road and Highway 93. The analysis should be based on equivalent cars (i.e., factor of 2 for large trucks), together with a more realistic estimate of peak period turns that may be generated from the pit. Left turn lane warrants may be met under such conditions. The Township requested in the January 29, 2020 letter that the TIS include an analysis based on equivalent cars (i.e., factor of 2 for large trucks). In Burnside's experience, it is good practice to apply a truck adjustment factor for establishing warrants where truck turning may be a consideration. Transportation Association of Canada (TAC) guidelines (Geometric Design Guide for Canadian Roads, June 2017), specifies longer gap requirements for truck turning maneuvers as compared to cars. The additional information provided by Crozier in their Memo dated October 2, 2020 does not satisfactorily address this concern. The Township maintains that the analysis be adjusted based on equivalent cars (i.e., factor of two for large trucks), unless comments can be provided by the MTO that this is not required.
- The Township requests that CRH notify the Township and Burnside when the Encroachment Permit has been issued by the MTO.
- The Township requests that CRH enter into a Road Improvement Agreement for Darby Road with the Townships of Tiny and Tay, which would include, but not be limited to, detailed engineering design drawings and securities.

In addition, the Council for the Township of Tiny, approved the following additional comments by way of Motion #339/20:

- That the Township is fundamentally opposed to the extraction and washing of aggregate in environmentally sensitive areas.
- That there is presently a groundwater study being led by Dr. John Cherry from the University of Guelph and that the findings of this report be taken into consideration by the Province prior to the issuance of any further licenses.

Sincerely,

#### THE CORPORATION OF THE TOWNSHIP OF TINY



Shawn Persaud, BA, MCIP, RPP,  
Director of Planning & Development

Tim Leitch, P. Eng.  
Director of Public Works

CC: Members of Council for the Township of Tiny  
 Sue Walton, Director of Legislative Services/Clerk for the Township of Tiny ([swalton@tiny.ca](mailto:swalton@tiny.ca))  
 David Parks, Director of Planning, Economic Development and Transit ([David.Parks@simcoe.ca](mailto:David.Parks@simcoe.ca))  
 Cecil Gratrix, R. J. Burnside & Associates ([Cecil.Gratrix@rjburnside.com](mailto:Cecil.Gratrix@rjburnside.com))  
 Julie Cayley, Severn Sound Environmental Association ([JCayley@severnsound.ca](mailto:JCayley@severnsound.ca))  
 Hon. Bruce Stanton, MP, North Simcoe ([bruce.stanton@parl.gc.ca](mailto:bruce.stanton@parl.gc.ca))  
 Hon. Jill Dunlop, MPP, Simcoe North ([jill.dunlopco@pc.ola.org](mailto:jill.dunlopco@pc.ola.org))