

Ministry of Natural Resources
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- and to -

Highland Companies
P.O. Box 377
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Highlands Companies
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Environmental Commissioner of Ontario
1075 Bay Street, Suite 605
Toronto, ON M5S 2B1

Proposed Quarry in Melancthon Township
EBR Registration No. 011-2864
Application by 3191574 Nova Scotia Company, the Highland Companies

To Whom It May Concern:

As a resident of the Town of Mono living at 387192 20th Side Road for over 21 years, I am opposed to the development of a massive quarry in Melancthon Township.

While virtually every aspect of this application is negative for Ontario, I am specifically addressing location, traffic, greenhouse gas emissions and potential foreign ownership.

Location

It is my understanding that one of the key principles of the Aggregate Act is that aggregate facilities be located close to the point-of-use.

If you use a compass with the base point in Toronto and the limit point being in Melancthon, you can draw an arch across Ontario that covers most of Southwestern Ontario, which includes a larger number of active and potential gravel/aggregate locations that are much closer to the points-of-use.

Have any studies been done on the viable alternative locations that are closer to market thus having a lower transport cost and wouldn't remove incredibly valuable prime agricultural land from the future of Ontario? I am requesting information on whether such studies have been done.

Traffic

I have reviewed the proponent's Traffic Assessment Study and, while it is a great analysis of current conditions and theoretical comparisons for potential increases, it is not project specific in any manner.

Have studies been done based on the Highlands Companies Business Plan that show specific details of additional traffic flow on the route(s) that will be taken to the point-of-use locations? I am requesting information on whether such studies have been done.

According to a member of the Mono OPP detachment, no official representation has been made by Highlands Companies regarding the potential increase in traffic flow for Mono. Have studies been done on the traffic flow impact for each municipality en route to the GTA point-of-use and reviews held with the appropriate OPP detachment(s) concerned? I am requesting information on whether such studies have been done.

As a resident of the Town of Mono, I am requesting a 24 Hour Analysis (by the hour) that shows the average traffic flow increase, per the Highlands Companies Business Plan, each way (to and from) separately on:

- ✓ Highway 89 from Highway 10 to Airport Road
- ✓ Highway 10 from Highway 89 to Highway 9
- ✓ Airport Road from Highway 89 to Highway 9
- ✓ Highway 9 from Highway 10 to Airport Road
- ✓ Any other route(s) that might be considered through Mono

In the Highlands Companies "An Open Letter to the Community" published in the Orangeville Citizen on April 14th, it states "*School location and school bus routes were considered in identifying the proposed haul routes*". My review of the Traffic Assessment Study shows no evidence of any consideration to school locations and school bus routes. Have any such analyses been done? I am requesting information on whether such studies have been done.

The Provincial "Places to Grow" program has scheduled Dufferin for a 53% increase in population by 2030 but there doesn't appear to be any acknowledgement of the huge increase in traffic that will happen in the next 5, 10 and 15 years. Have any analyses been done that incorporate these numbers? I am requesting information on whether such studies have been done.

Green House Gas (GHG) Emissions

The Highlands Companies have quoted the potential of 300 trucks per hour, assuming this is a one way number; the daily potential is 7,200 ... a truly astonishing number.

Have studies been done to evaluate the GHG emissions generated annually by this massive number of gravel trucks? I am requesting information on whether such studies have been done.

This leads to the bigger question, which is ... have studies been done to evaluate the GHG emissions generated by the daily activities at the quarry? I am requesting information on whether such studies have been done.

This is a critical concern and no permit should be issued until these reports are done, peer reviewed and vetted by the Ministry of the Environment

Potential Foreign Ownership

Nowhere in the 25 Consultant studies and reports is there an initial five-year Business Plan showing details of how the Highlands Companies expect to operate and manage the quarry in question. Additional inquiries and investigation was unable to turn up this critical document.

Since the Highlands Companies is newly incorporated, details are not available as to who is on the Board of Directors, who are the key executive personnel, what is the financial structure, etc.

In essence, this appears to be a shell company, which leads to the speculation that as soon as an aggregate permit is issued, the Highlands Companies will flip the entire project, for a handsome profit, to the highest bidder regardless of their nationality.

This would be like selling the Tar Sands to a foreign entity, which the Government of Canada would never allow to happen.

There is also precedent in Ontario under the Ministry of Energy via the Ontario Power Authority, which now states that permits are only allowed on the condition that more than 60% of the materials and supplies are manufactured in Ontario.

I respectfully request that no permit be issued until there is clarification as to "operating ownership" both short term and long term or that the Ministry enforce "conditions of sale", using the OPA model, that entrench rights to ensure foreign ownership is not allowed.

Yours truly

"PAUL LANSING"

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