REFERRAL TO _____
RECOMMENDED

DIRECTION REQUIRED _____

RECEIPT RECOMMENDED ✓ _____

Re: Hwy 413/GTAW and Holland March Highway/ Bradford Bypass

Gravel Watch Ontario is an umbrella organization of community groups across Ontario concerned with the impacts of aggregate extraction. This means that Gravel Watch members have acquired expertise on the legislation and regulations surrounding this industry. As well, they are witnesses to the 'interim' extraction phase and the long afterlife of pits and quarries. Given that road building uses large quantities of aggregate, Gravel Watch suggests that full cost accounting is vital.

While Gravel Watch Ontario is aware of the discussion around the environmental and economic impacts of these proposed routes, our comments will be limited to the equally significant impacts of the removal, processing and hauling of aggregate materials on communities and the environment along the route. Because the Provincial Policy Statement 2020 supports a close-to-market approach, it is likely that the lands on either side of the proposed route will be disturbed in a number of places in order to find underlying aggregate. This will expand the footprint of the transportation routes. In doing so, it will remove prime farmland from Ontario's dwindling supply, and the filtration materials through which precipitation flows to the water table. In a province where food and water first are not only public priorities but also keys to sustainability, all potential locations where aggregate could be found are subject to new, renewed or expanded extraction. Lacking farmland, food prices must rise; the National Farmers' Union suggests that farmland in Ontario's prime growing areas cannot be fully restored after aggregate has been removed. Lacking clean drinking waster, costs to municipalities and residents for a consistent supply in sufficient quantity and of sufficient quality will rise. These expanded costs need to be factored into the decision-making.

While gravel extraction has direct and indirect impacts on the environment and communities around it, processing and haulage add considerations of noise and

dust to the 'sensitive receptors', the people who live in proximity to the aggregate's extraction, processing, haul routes and construction sites. The Ministry of the Environment considers dust and noise as pollutants. Medical researchers have also added science around the cumulative human health impacts of dust and fine particulate matter. PM 2.5, fine particulate matter, according to Dr. Ray Copes and others, has negative health consequences on lungs, hearts, and brains. Similarly, The Ontario Ministry of Labour states that sounds at or below 70 decibels (dBA) are generally considered safe. Any sound at or above 85 dBA is more likely to damage your hearing over time. Researchers have found that people who are exposed over long periods of time to noise levels at 85 dBA or higher are at a much greater risk for hearing loss. Noise, like dust, can be a nuisance, but if persistent, or plenty, is a health hazard. Long-term exposure to dust and noise due to a lengthy construction process of either these proposed expressways and/or other projects for which aggregate is also produced, needs to be carefully considered before a project is designed, sited or constructed.

Gravel Watch has a triple mandate: Vigilance, Education and Advocacy. We remain vigilant to plans which will have negative impacts on communities. We seek to educate our members and the public on the cumulative environmental and human health impacts of the aggregate industry in Ontario. We advocate for a rational approach to aggregate where the costs of all kinds to communities are reduced in favour of quality and duration of life. In the calculation of costs and benefits of the 413 and Bradford Bypass, costs need to be assumed by the producers, not externalized; benefits need to be proven, not blue-skied.

Sincerely,

Bryan Smith, President

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