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January 21, 2024

**Re: OEAC Comments on ERO 019-8065 and Related Matters**

The Oxford Environmental Action Committee (OEAC) is a non-profit organization based in Oxford County, Ontario. We promote responsible and environmentally sustainable land use planning, use of the precautionary principle in decision making, the safeguarding of Ontario's environment, and the protection of public health and wellbeing.

Lafarge's MNRF posted proposal for a major site plan amendment of their Woodstock Quarry – ARA licence #2180 proposes to modify and expand sources of sound from a stationary source. The short distance between the proposed crushing, screening, loading, and trucking and the nearest sensitive receivers increases the chance that impacts will cause neighbours who dwell close to the quarry to experience adverse effects. Some of the sensitive noise receptors are a mere 50 metres from the site.

The MNRF is falling behind technologically, and impacts are being experienced by the public as a result. All ERO postings for aggregate site plan amendments should include detailed descriptions of the undertaking and links to digital versions of ARA site plans and associated documents, such as noise, traffic, and human health impact assessments that have been submitted by the proponent or prepared by the Ministry. These materials should also be accessible by e-reader to the broadest extent possible. The MNRF's technical staff should prepare site inspection reports that are available for the public to review online in conjunction with proposals for major site plan amendments. The MNRF should require all noise and vibration assessments to include colour noise contour mapping overlain on recent aerial photography to more accurately assess the acoustics of the current and proposed topography of the area.

The MNRF and other ministries that should be assessing the proposal (such as the MECP and MTO) should consider their duty to protect rural residents from the cumulative impacts of multiple sources of noise, vibration and dust in and around the area of the Lafarge Woodstock Quarry.

With the WHO's nighttime sound recommendation being a max 40dB, we believe the proposed mitigation does not provide enough of an acoustical barrier to be protective of the people who reside in the nearby dwellings and their ability to use and enjoy their homes and the outdoors of their properties in the usual manner of someone living in a rural dwelling in Oxford County's prime agricultural area. We believe that site amendment criteria should include comparisons between similar rural residential areas that do not have heavy industrial activities in their midst, and the experience that the Province of Ontario is providing for the families who dwell in properties adjacent to heavy industrial aggregate operations.

What are the timelines for the projected noise emissions and other activities listed in the proposed version of the Operational Notes?

Noise management procedures carried out by the MNRF and MECP to reduce adverse effects from aggregate operations include setting operating hours that give local residents who live close to the quarry a predictable and consistent reprieve from the sounds associated with the extraction, processing and trucking of aggregates. Noise producing activities at the quarry should not occur outside of the regular daylight working hours of 7am-7pm Mon-Fri, and 8am-1pm on Saturdays, with stat holidays and Sundays as opportunities for respite from the inundation of quarry noise.

In ***Environmental Noise and Sleep Disturbance- A Threat to Human Health?***<sup>1</sup> Demian Halperin explains the links between environmental noise and human health impacts and outcomes. *The World Health Organization (WHO) has documented seven categories of adverse health and social effects of noise pollution, whether occupational, social or environmental: hearing impairment, interference with spoken communication, cardiovascular disturbances, mental health problems, impaired cognition, negative social behaviors and sleep disturbances [1]. The latter is considered the most deleterious non-auditory effect because of its impact on quality of life and daytime performance [2-4].* And further, that *Nocturnal environmental noise also provokes measurable metabolic and endocrine perturbations (increased secretion of adrenaline, noradrenaline, cortisol), increased heart rate and arterial pressure, and increased motility.*

Review of the proposal has left us with a number of unanswered questions:

- Why is the Ministry of Environment, Conservation and Parks (MECP) not also reviewing the major site plan amendment proposed by Lafarge, when compliance monitoring for noise, vibrations and dust are MECP responsibilities?
- Will the proponent have to apply to modify/amend their existing ECA (air) prior to any major site plan amendment regarding contaminants?
- Has there been a traffic study done to support the significant site plan amendments proposed by Lafarge?

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<sup>1</sup> Halperin, D. National Library of Medicine. **Environmental Health and Sleep Disturbance – A threat to Human Health?**. November 2014.

- What is the current number of heavy vehicle movements per day on the Lafarge quarry property?
- How many truck movements are there at the entrance/exit of Lafarge on Line 35 in Zorra?
- What would the impacts of proposed activities be to truck movements during evening, nighttime and weekends if the amendments were to be approved? How would those impact the acoustical environment of people who live in the Class 2 and Class 3 properties surrounding Lafarge and their haul routes?
- What assessment has been prepared on the cumulative impacts to the people and properties along the haul route for roads that are used by Lafarge, Federal White Cement, and IKO Crushing, along with local traffic?
- What would the impacts be of light pollution from a quarry stone processing site that is being artificially lit during evening, night time and early morning hours? What are the risks to quarry workers who are processing aggregates during the night time hours?

We posit that predictive modelling methods that are acceptable to the MNRF may still result in real-world living conditions that are unacceptable to community members impacted by noise as a “nuisance” contaminant. How would the MNRF respond to area resident’s complaints about noise, vibrations and dust emanating from the site, if they were caused by activities that were part of an approved ARA site plan?

The OEAC opposes proposals that would inundate rural property owners with nuisance noise, vibration and dust impacts. We advocate for the keeping of quiet hours to protect the sleep needs of people who live in homes in close proximity to the proposed quarry activity. Weekends, statutory holidays and sleep hours should provide quiet from construction, processing, blasting and trucking sounds and vibrations.

Thank you for the opportunity for our organization to provide comments under the ERO, according to the EBR.

Sincerely,

Suzanne Crellin, President, Oxford Environmental Action Committee  
Prepared for the Oxford Environmental Action Committee (OEAC)

*These comments are submitted in good faith regarding ERO# 019-8065 and related matters. The opinions and beliefs contained are those of the commenting organization, Oxford Environmental Action Committee (OEAC) on proposals we believe may impact the natural environment and public health and wellbeing.*