

December 16th, 2005

Stan Holiday  
Senior Planner – Legislative Approvals  
City of Hamilton  
71 Main Street West  
7<sup>th</sup> Floor  
HAMILTON, Ontario  
L8P 4Y5



Re: Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89

Dear Stan,

Please find attached a supplementary written submission to the June 27<sup>th</sup>, 2005 filing regarding Natural Environment from Friends of Rural Communities and the Environment (FORCE) to both the Peer Review and the Combined Aggregate Review Team (CART) processes for the proposed Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89. This written submission is a critique of the Stantec Report (September 2004). It is comprised of Part I – Natural Environment Component, authored by Dr. Brent Tegler of North-South Environmental Inc., and Part II – Aquatic Biology Component, authored by Brian Hindley, M.Sc. of Aquafor Beech Ltd.

**Open pit mining below the water table constitutes a land use change with one of the most severe of human caused environmental impacts** due to the complete removal of the original landscape, including all plants, animals and soil, and the disruption of surficial and groundwater hydrology. The severity of the environmental impact associated with open pit mining below the water table requires all due consideration will be given by both the proponent and the review agencies when considering this type of proposed land use change. **A full and comprehensive evaluation of natural features, functions, impacts, mitigation and monitoring will be required.**

**Both authors submitted here determine however, that the Stantec Report does not meet this standard.** There are numerous issues with methodology, analysis, and the reporting of results.

We are very concerned that the preliminary nature of the Stantec report means:

- there is incomplete knowledge of the natural environment and aquatic biology features present on and surrounding the site, as well as limited understanding of their functions
- there will be a need to incorporate all new information into all relevant sections of the report, including methodology, site conditions and all screening, impact and mitigation analyses, such that subsequent revisions of the report will convey all information in a manner that fully integrates the ecological and hydrological structures and functions of the site
- **new information should not be provided as a series of discrete “packets of information”.** **Information provided as a series of discrete “packets of information” will lead to a disjointed understanding of environmental features and functions and preclude a careful analysis of environmental impacts**

There is insufficient documentation of the existing natural environment features and aquatic conditions and components of the watercourses potentially impacted by the proposed operation to conclude that the quarry will not impact these resources. Based on this, the Stantec report cannot adequately make any conclusions with respect to mitigation, nor, in our opinion, conclude in favour of the application, as it does.

FORCE appreciates the opportunity to participate in the process afforded by the City of Hamilton. This cover letter and the enclosures constitute our supplementary submission to the application's natural environment analysis. This response will be supplemented, as necessary, during the course of the application review period and as the proponent amends their application. We have provided the material electronically in pdf form and would ask that this material be provided to the City's Peer Review Team and CART members to be considered as an input to the application review process for the proposed Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89.

Respectfully submitted,

A handwritten signature in black ink that reads "G. Flint". The signature is written in a cursive style with a long horizontal line underneath the name.

Graham Flint BAsC, P. Eng  
Chair & Spokesperson

copy via Email to: [sholiday@hamilton.ca](mailto:sholiday@hamilton.ca)