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July 23, 2015

Elizabeth Howson BES MCIP RPP
Principal
MSH Ltd.

Re: Comments on the Town of Halton Hills- Hatch Mott Macdonald Report

Dear Ms. Howson,

We have reviewed the Hatch Mott Macdonald (HMM) Report dated March 3, 2015. This report reviews the Final Haul Route Study prepared by Cole Engineering dated March 30, 2015.

There are several points that are important to raise at the outset that should inform any consideration of the HMM report. These are:

The Hidden Quarry will not change the rate of consumption nor the location of consumption of aggregate products. The GTA, Georgetown and Acton currently consume large volumes of aggregate in the construction and maintenance of roads, infrastructure, homes and businesses. Every load shipped from the Hidden Quarry to these markets will supplant a load that would have been delivered from a competing pit or quarry. As such there is not really any "new" traffic generated by the Hidden Quarry, only a new origin. Hidden Quarry is much closer than many competitors and as such will reduce overall traffic.

Truck traffic from Halton pits and quarries has been in steady decline over the past decade. The Town of Halton Hills and the Region of Halton have seen a significant decline in the local production of aggregate products. According to TOARC statistics, the Region of Halton production has declined from 15.8 million tonnes in 2001 to a low of 6.8 million tonnes in 2013. Similarly Burlington and Halton Hills (statistics combined to ensure confidentiality) have together seen a precipitous drop from 7.0 million tonnes to 2.1million tonnes over the same period.

Crushed Stone sources from Halton Region cannot keep pace with GTA demand. Many Halton quarries have shut down or are running critically short of material. Recently, local opposition resulted in the refusal of an important license extension in Burlington. The State of the Aggregate Resource in Ontario Study indicates that despite the decline in Halton Region crushed stone production, overall stone consumption in the GTA will increase. It is logical that resources identified in neighbouring municipal Official Plans will be coming on stream to make up the deficit. See attached figures.

The Town of Halton Hills has recently approved truck generating development in the Acton area including a 4 Million Tonne per annum quarry and a business park. The Town of Halton Hills on it's Economic Development webpage is actively promoting an important industrial park on the north side of Acton and has recently approved an extension to the Acton Quarry which has the potential to generate many times the traffic of the Hidden Quarry. The HMM report is silent about the impact of these local approvals.

The HMM report indicates that any new truck traffic is a concern. If taken to a conclusion this would advocate the limitation of any growth in the provincial economy upstream from the Town of Halton Hills, including any industrial development in Guelph Eramosa Township, relying on Halton Hills transportation corridors. The Provincial Growth Plan and local planning documents acknowledge that significant growth will occur in areas relying on transportation corridors through the Town of Halton Hills. The Hidden Quarry traffic should be considered part of this planned growth. The Province funds the maintenance of Hwy 7 and the Connecting Link through Acton and Georgetown in recognition that these roads have the function of carrying inter-regional traffic for the movement of people and goods.

We agree with the HMM findings in the following areas:

1. **The number of site generated trips is relatively small in comparison to the existing traffic.**
    - Even using extremely high peak year/ peak month/ peak day calculations performed by HMM, the traffic impact on Highway 7 west of Churchill Road would result in only a 0.2 percent increase in daily traffic. This event is an outlier and would only occur very rarely.
    - Similarly, on County Road 25, the increase in daily traffic would be only a 1.0 percent increase. Once again this event would only occur rarely.
    - Both these values lie within the range of daily fluctuations of existing traffic on these roads.
2. **There is a lack of a suitable east- west truck route other than Highway 7.**
    - A high degree of truck route restrictions by the Town of Halton Hills and the Region of Halton on all east-west routes with the exception of Highway 7 has focused truck traffic into the urban centres of Acton and Georgetown.
    - The alternative Highway 7 alignment by-passing Acton, while identified in the Halton Region Transportation Master Plan Study conceptually, is not currently a priority with the road authority and no approvals or programming is currently in place for this potential route.
3. **The peak hour of the peak day of the peak month of the peak year is about 23 shipments per hour.**
    - In correspondence to Burnside dated July 31, 2013 Cole Engineering responded to comments by Burnside relating to peaking, taking into account days of the week, weather etc. Cole calculated the peak hour of the peak month in a peak year scenario at 24 shipments per hour, similar to the calculations made by HMM.
    - While interesting to note, this number has less value in planning for actual impact from the quarry operations as the manifestation of this traffic level would be exceedingly rare, if in fact it ever actually occurred.
    - All of the traffic impact calculations in the HMM report use this extreme shipping day scenario, yet increases in daily traffic remain small.

We respectfully disagree with the HMM report in the following areas:

A. **Highway 7 through the Township of Halton Hills is not "incompatable" with truck traffic.**
    - Use of Highway 7 is permitted, planned, designed, designated, funded and used for truck traffic. Both the Halton Region Official Plan, and the Halton Hills Official Plan identify the function of Provincial Highways to accommodate mainly inter-regional traffic and accommodate all truck traffic. This road serves an essential inter-regional function for which there are no current alternatives.

B. **The HMM report, while being commissioned by the Town of Halton Hills, ignores significant transportation advantages in other jurisdictions.**
    - The Hidden Quarry as a new point of origin for aggregate products in a close to market location eliminates approximately 1.5 million kilometers per year of current truck traffic. Guelph and many other municipalities will see a reduction in truck traffic given the more competitive location of the Hidden Quarry. This will

save costs to consumers, taxpayers, lessen congestion and reduce road wear and tear. This overall provincial benefit was not considered in the HMM report.

C. Overall collisions will be less with the Hidden Quarry approval.

- The savings of up to 1.5 million truck kilometers per year will reduce overall collisions.

D. There is no serious traffic congestion currently in Acton when compared to most other parts of the GTHA.

- As an experienced truck fleet operator, the traffic flow in Acton is currently not in a condition that would warrant the use of extended alternative routes. When compared to most other traffic nodes in the GTA, the intersection in Acton is relatively free flowing. While traffic conditions are perceived relatively, many GTHA municipalities are far more congested than Halton Hills. The Halton Transportation Master Plan 2011-2031 Appendix F4 Goods Movement (Page 11) states: *"Halton generally experiences less severe levels of congestion than some other areas within the GTHA as Halton's Travel Time Index (1.44) is still below the GTHA average of 1.63."*
- Travel through Acton on County Road 25, even at rush hour, can be accomplished in one or two minutes.

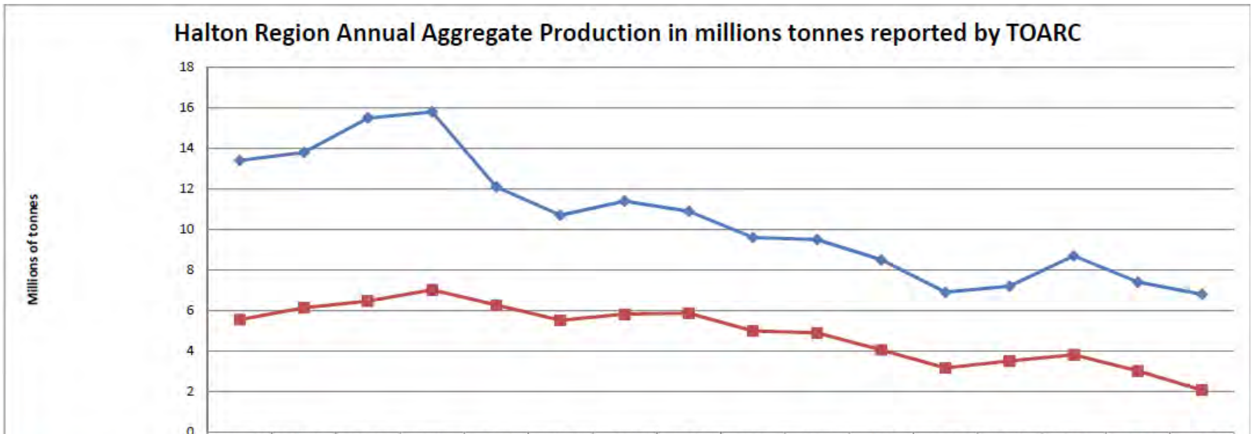
These comments were prepared in consultation with Cole Engineering. For technical information we continue to rely on the Cole Engineering TIS and HRS as previously submitted.

I have attached some self-explanatory figures taken from TOARC Statistics and from the 2009 State of the Aggregate Resource in Ontario Study (link below) . These figures outline the projected demand for aggregate, particularly crushed stone, Halton's diminishing role in crushed stone production, and the challenge that Ontario faces in making new resources available.

http://files.ontario.ca/environment-and-energy/aggregates/aggregate-resource-in-ontario-study/stdprod_067712.pdf

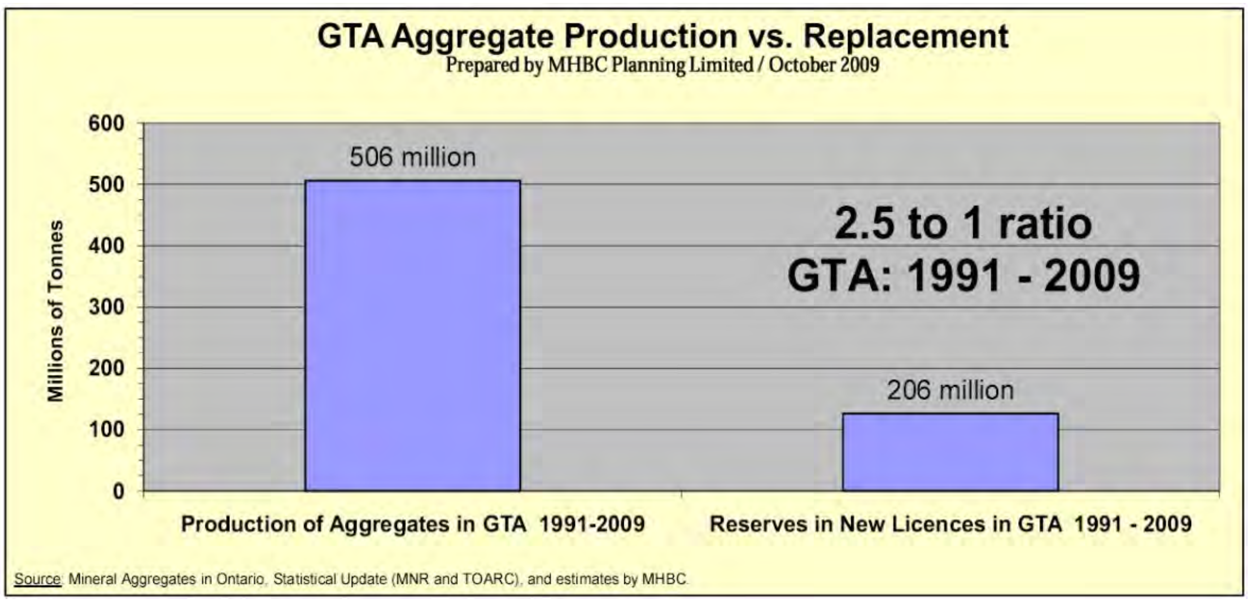
Sincerely
JAMES DICK CONSTRUCTION LIMITED

Greg Sweetnam



	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Halton Region	13.4	13.8	15.5	15.8	12.1	10.7	11.4	10.9	9.6	9.5	8.5	6.9	7.2	8.7	7.4	6.8
Halton Hills/Burlington	5.54	6.14	6.47	7.02	6.27	5.51	5.82	5.87	4.99	4.90	4.06	3.17	3.51	3.82	3.02	2.07

Essentially all of the west GTA Crushed Stone production has come from Halton as Peel, Toronto and York produce none.



We are 300 Million tonnes behind where we were in 1991 as of 2009. We have used up another estimated 40 Million Tonnes of GTA reserves since 2009.

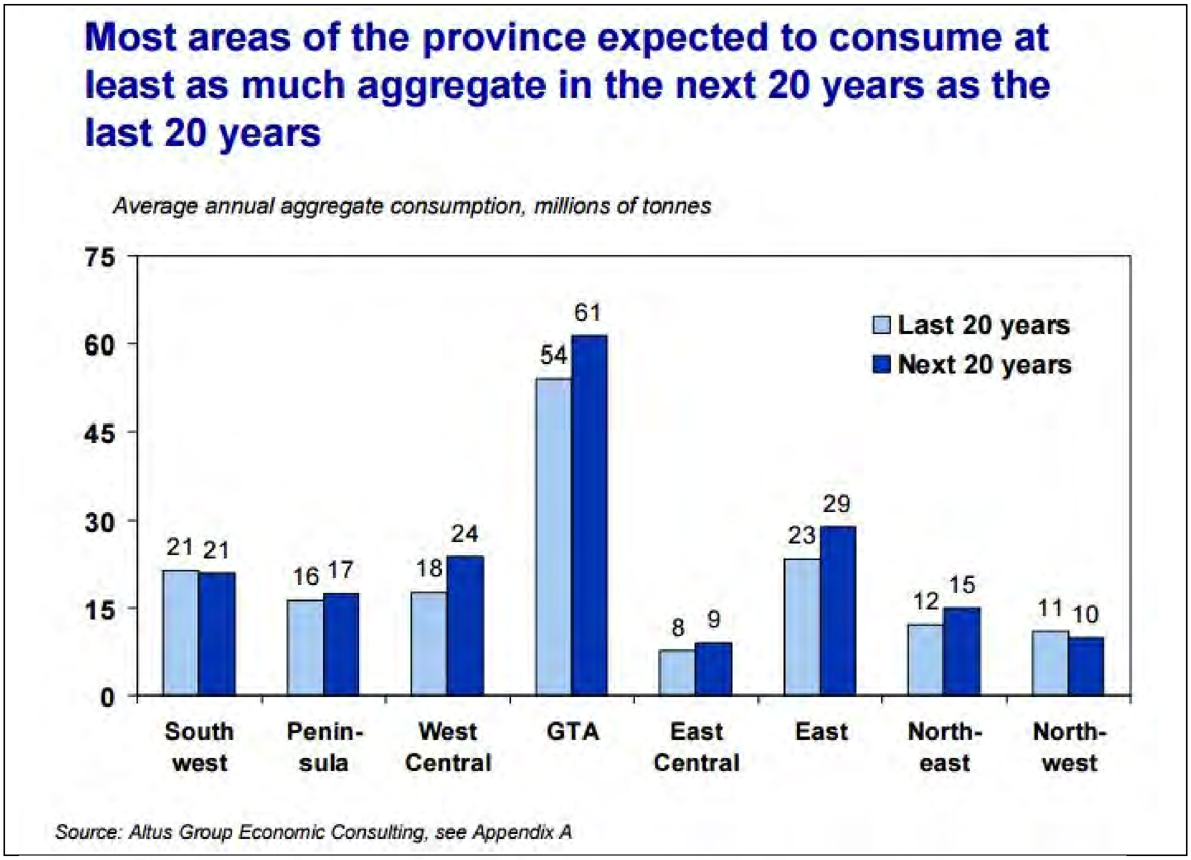


Figure 2- 6 Crushed Stone as a % of Total Consumption of Primary Aggregate, Ontario

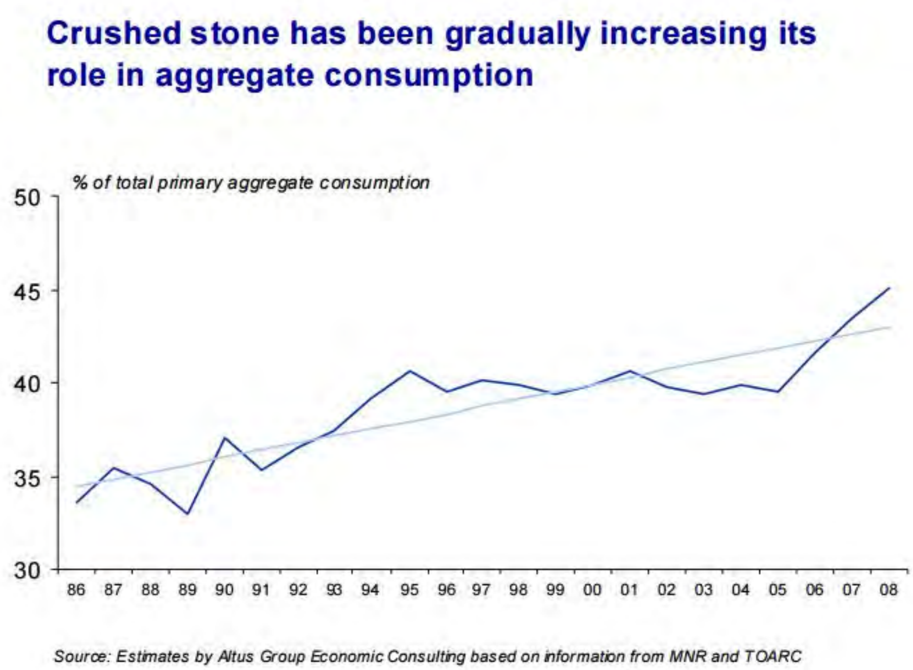
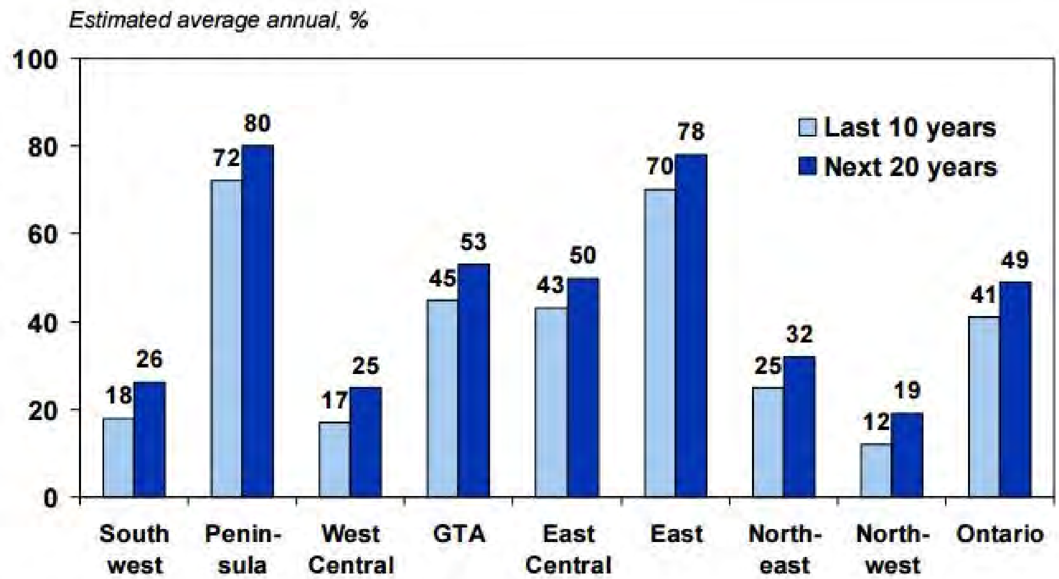


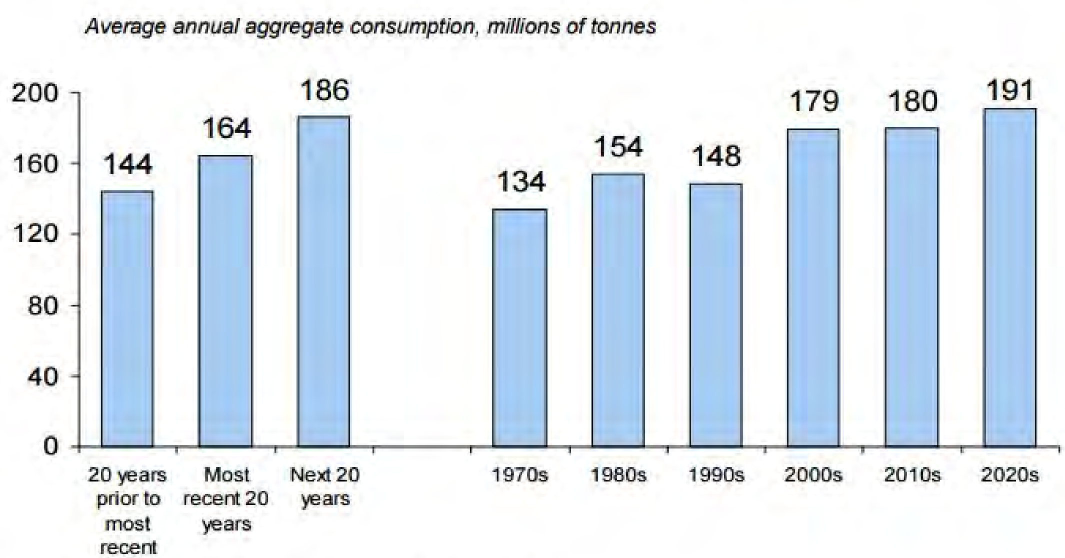
Figure 5- 19 Crushed Stone as % of Total Consumption of Primary Aggregate, Geographic Areas

Usage of crushed stone expected to continue to increase



Source: Altus Group Economic Consulting, see Appendix A

Ontario's consumption of aggregate expected to be higher over the next 20 years than the last 20 years



Source: Altus Group Economic Consulting; see Appendix A