



JAMES DICK CONSTRUCTION LIMITED



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June 26, 2015

Mr. Henry Centen, P.Eng.
R.J Burnside and Associates

RE: CRC Memo dated April 27, 2015

Dear Sir,

We received the document entitled the document entitled “Review of JDCL Traffic Impact Study and Haul Route Study” dated April 27, 2015 following a presentation of the same subject matter by Doug Tripp of the Concerned Residents Coalition (CRC). The CRC is a group of residents that is opposed to the approval of the Hidden Quarry (CRC Website, March 8, 2013 “About Us”). While the author of the document is not identified, the document is printed on CRC letterhead. The CRC paper is an amateur critique, makes errors, misunderstands information in the traffic reports and fabricates information to bolster its position on the application. The CRC document cannot be considered a professional peer review of the Hidden Quarry Traffic and Haul Route Reports. However, in an effort to provide clarity, this letter provides facts, information and company policies for the assistance of Burnside in their overall review of issues raised. This letter is has been prepared with input from Cole Engineering, but appropriately does not present conclusions on traffic impact. For that we continue to rely on the reports and correspondence presented to the Town and Burnside by Cole Engineering. This information below is presented under headings identified in the CRC document.

1. Number and Frequency Distribution of Truck Trips

James Dick Construction Limited Operates a fleet of gravel trucks in Southern Ontario. The fleet comprises the following vehicle types:

Type	Payload	Number of Units
Tri-Axle Straight Truck	22.7 Tonnes	21
Tri-Axle Tractor Trailer	35.1 Tonnes	18
Quad-Axle Tractor Trailer	39.1 Tonnes	16
Tri-Axle Pony Pup Combination	41.4 Tonnes	30
Average	35.0 Tonnes	

The CRC asserts that the average truck payload presented in the reports should be 16 metric tonnes rather than the conservative 33 tonnes assumed by Cole Engineering. There is no justification given for the CRC 16 tonne number other than the statement that truck type known as a “10-wheel tandem dump truck” carried this payload. Tandem Axle trucks were used in the past but have been completely replaced in the JDCL fleet and in the aggregate industry in general by larger Tri-Axle trucks. Obviously the CRC average load size of 16 metric tonnes is impossible to achieve given the minimum load size in the JDCL fleet of over 22 tonnes.



James Dick Gravel Fleet Trucks Types. Left to Right: Tri-Axle Straight Truck, Tri-Axle Tractor Trailer, Quad-Axle Tractor Trailer, Tri-Axle Pony Pup Combination.

It should be noted that the high quality stone products that will be produced at the Hidden Quarry are generally conducive to larger vehicle types. Plant Hauls of these materials are usually made using 42 Tonne capacity Pony Pups.

Finally, Cole's trip generation was not based on truck sizes, but based on actual shipping data from the Erin Pit.

The CRC misinterprets data presented in the Cole reports. Background traffic is confused with site generated truck trips. For example, car traffic from residents turning west onto Highway 7 from the sixth line is misconstrued by the CRC on The Haul Route Study Figure 3-1 to be truck traffic.

Generally there is a pattern at JDCL sites that the morning hour as described by Cole Engineering, is the busiest hour of the day. Detailed analysis of a very busy month as described in Figure 4-2 indicated that in busy times the day is much more evenly distributed with loads. This is not a contradiction rather it demonstrates actual shipping behaviour that can be expected based on real life shipping from a comparable proxy site during a busy month.

2. Haul Routes

Given the presence of the JDCL Guelph Quarry and the market conditions that powerfully incent shipping towards Toronto, there is not expected to be any shipments from the Hidden Quarry through Rockwood. Loads shipped from the Guelph Quarry will not pass through Rockwood as areas east of Rockwood would be shipped from the Hidden Quarry. As such, traffic from JDCL sites would be eliminated through Rockwood, including existing traffic from the Guelph Quarry.

Examination of the area south of Highway 7 on the Guelph Line have revealed numerous Halton Region and local jobs that are slated to go forward during the life of the Hidden Quarry. As such 5% of the Hidden Quarry traffic is estimated to fill the demand on these jobs. This 5% of traffic turning west on Highway 7 prior to turning south on Guelph Line will not proceed to Rockwood.

The Erin Pit is an operation with the following characteristics that make it comparable to the Hidden Quarry:

- It has a similar annual production rate that is comparable to the Hidden Quarry.
- It is located on the border of the GTA similar to Hidden Quarry.
- It is located in Wellington County
- It provides washed products to the same market, albeit, Erin pit produces primarily concrete sand and concrete stone, while Hidden Quarry will produce concrete stone for high strength concrete.
- Both sites are located approximately the same distance from the primary markets.

Cole Engineering TIS presents traffic data for shipments that can be expected during busy times. 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. An excerpt from this letter is below:

Comment # 5:

“The forecast of trip generation from the proposed quarry is based on data from a proxy survey site (i.e. Erin Pit). On a weekly basis, the calculation assumes consistent traffic over a Monday to Saturday period, inclusive. Information should be provided to confirm this assumption. The number of working days assumed for the critical month (i.e. August) also does not appear into account holiday period, or any reduced operations due to weather, over the monthly period. Also the trip generation is based on average loads which are typical of tractor trailers, whereas actual trip volumes may be higher if the fleet is comprised of higher numbers of tandem or tri-axle trucks. Based on the above factors, the estimates for peak period traffic may be low”.

Response #5:

Trip generation for the site was derived using information from the Erin Gravel Pit and provides the number of vehicles per hour for the entire month of August (the peak month) and is provided in **Appendix A** for reference. The analysis in the April 2012 study assumed an average day during the peak month during both the a.m. and p.m. roadway peak periods. This would be typical of quarry operations. In addition to the trip calculations, the 33 tonne average load used to estimate the number of truck trips took into account tractor-trailers, tandem and tri-axle trucks expected to serve the site.

During the busiest month of August 2011, there were 2,826 trucks that loaded at the quarry with the peak hour being 23 vehicles and represented 0.814% of the monthly traffic at the Erin Pit. Based on the 33 tonne per load figure and as documented in the April 2012 study, at the Eramosa Quarry, there will be a total of 21,213 trucks per year, of which there will be 2,989 trips during the peak month. Applying the 0.814% peak hourly factor results in a total of 24 trucks per hour or one (1) truck every two (2) minutes and 30 seconds.

3. Collisions

The Hidden Quarry will reduce truck travel in Ontario by an estimated 1,500,000 km annually. Table 3.2 in the Haul Route Study outlines the rationale for this reduction. As such, it follows that if there is less truck traffic there will be fewer collisions if the Hidden Quarry is approved. The Bolton Plant is only used in the calculation as a proxy for the market area. Deliveries anywhere in the market area would have similar truck savings because Hidden Quarry is closer to these markets by a similar differential as the calculation to the Bolton Plant. Production from competing quarries will be realigned to serve markets where they have a haul advantage.

4. Truck Queuing

The CRC misunderstands the concept of truck queuing. The gates of the quarry are opened generally one half hour before loading commences. Once the gates are open there is space in the quarry for dozens of trucks. Opening the gates early allows our staff to enter the property, get the computers booted up, coffee machine going and allow circle checks to take place on the machines prior to loading operations. Drivers are not permitted to arrive early at the quarry. Trucks arriving early will be strictly disciplined, including refusal to load. In the rare event where a truck arrives before the gates are opened, the entrance is designed to allow at least one truck length between the shoulder and the gate to allow an offending truck to get off the road. In practical terms there would actually be room for two or three trucks to line up abreast. Company policy is to refuse to load a truck that arrives early a second time. Trucks lining up on the public road allowance is not an issue at any of our other sites.

5. Other Issues

1. Figure 3-1 is schematic and is not intended to be drawn to scale.
2. The use of the Bolton Ready Mix plant, as indicated above, is a proxy for the market area to be serviced by the Hidden Quarry as it is located in the geographical centre of the market area. The Hidden Quarry market area is generally defined by Young Street to the East, Highway 9 to the North, Lake Ontario to the south and the Guelph Line to the West with a focus on the development fringe of the GTA Urban Area in Peel, Halton and York Regions.
3. All routes to be used by trucks from the Hidden Quarry in Halton are currently used by trucks hauling aggregates in Halton. They have a planned function to carry trucks, truck use is permitted and is currently occurring.
4. There will be a decrease in the number of trucks traveling through Rockwood and Guelph if the Hidden Quarry were to be approved. For example traffic currently servicing jobs in Acton from the Guelph Quarry would in future be serviced by trucks from the Hidden Quarry.
5. The quarry has a finite resource that will eventually run out.
6. Material is being shipped into this area from more distant sources today. The Hidden Quarry will not change the consumption patterns or quantities, only offer a new close to market source.
7. The reserves of GTA quarries have been seriously depleted since the Pits and Quarries Control Act first issued licenses back in the 1970s and any replacement reserves have not kept pace with consumption. Production in Halton has dropped from a 20 year high of approximately 15.8 million tonnes per annum to its current levels of around 6.8 million tonnes per annum. The Hidden Quarry will replace reserves and production capacity in a close to market location to service a market that has a strong demand.

Terms of Reference

JDCL has always taken the position that, given the fact that Highway 7 is a Provincial Highway permitted to carry and carrying a large volume of trucks, including trucks from our Guelph Limestone Quarry, that there is no requirement to perform a Haul Route Study for downstream municipalities. The Haul Route Study has been structured such that if there is not a significant impact, then any further work beyond Section 4 is not required. Cole Engineering has reached

the conclusion that the proposed operation is anticipated to have no significant impact on the surrounding road network. As such no work beyond section 4 is required.

CRC Additional Comments on the Haul Route Study TOR

These comments relate to the TOR for the Haul Route Study. This document was finalized and the Haul Route Study completed some time ago. As such comment by JDCL on these CRC comments is not relevant at this time.

Conclusions

1. The Erin Pit is an excellent proxy for the Hidden Quarry as stated above.
2. The CRC use of obsolete truck types carrying only 16 metric tonnes is not useful in determining truck loads. The CRC misunderstands the fact that Cole used actual shipping data from the Erin Pit to determine shipping patterns from Hidden Quarry.
3. Arriving trucks for all loads have been taken into account in the TIS and the HRS.
4. Both the HRS and the TIS are consistent in that the majority of traffic is bound for the GTA markets to the East. The CRC misinterprets Figure 3-1 of the HRS that accounts for car traffic turning to the west on Highway 7, rather than trucks from the Hidden Quarry.
5. Impact on the surrounding road network has been calculated by Cole Engineering based on actual shipping data from the Erin Pit.
6. Collision data was analysed on Regional Road 25, the road taking the greatest percentage of downstream traffic.
7. Truck queuing, as outlined above, will not be an issue at the Hidden Quarry.
8. Based on Cole Engineering's conclusion, as outlined above, sections 5 to 11 are not relevant.

Given the lack of accreditation of any author, the factual errors and the general misunderstandings of information, the issues raised in the CRC document should not be given any weight, other than that of a ratepayer objection to the quarry. Hopefully, the information outlined above should clarify certain issues for the reviewer trying to decipher the CRC document. For more detailed information or any required clarifications, inquiries should be addressed with Mr. Joseph Gowrie of Cole Engineering.

Sincerely

JAMES DICK CONSTRUCTION LIMITED

A handwritten signature in black ink, appearing to read 'Greg Sweetnam', with a small dot at the end.

Greg Sweetnam, V.P. , Resources