



September 11, 2019

Via: Email

Timothy Leitch, P.Eng.
Director of Public Works
Township of Tiny
130 Balm Street West
Tiny ON N0L 2J0

Dear Mr. Leitch:

**Re: Teedon Pit Extension
CRH Canada Response to Township March 25, 2019 Letter of Objection
Traffic Impact Peer Review
Township of Tiny, County of Simcoe, Ontario
Project No.: 300031221.0000**

The Township of Tiny (Township) submitted a letter of objection to an application for a Category 3 License under the Aggregate Resources Act for the proposed expansion of the Teedon Pit located in North ½ of Lot 80, Concession 1.

R.J. Burnside & Associates Limited (Burnside) was retained by the Township to Peer review the traffic issues resulting from the proposed expansion.

Burnside's comments on the traffic issues were provided to the Township in our letter of February 15, 2019. The February 15, 2019 Burnside comments and subsequent Township comments, which were provided to the Ministry of Natural Resources and Forestry and CRH Canada Group Inc. (CRH) by Township letter dated March 25, 2019.

CRH by letter dated June 20, 2019 provided a response to the Township and Burnside comments. The Burnside response to the June 20, 2019 CRH comments appear in italics.

TRAFFIC COMMENTS

1. Burnside Comment

The Application material did not include a Traffic Impact Study; however, it did include some traffic-related information.

In order to determine the impacts on Darby Road and on the Highway 93 intersection, a Traffic Impact Study (TIS) must be provided. It is acknowledged that the licensed extraction rate and truck volume are not proposed to increase, however the length that the pit will be in operation will change. Based on the maximum annual extraction volume of 600,000 tonnes, it will take an additional 17 years of operation to exhaust the Teedon Pit Extension supply

(assuming the existing Teedon Pit is near the end of its life). This should be a consideration in determining the revised traffic impact.

The alignment of Darby Road has a sharp bend at its intersection with Highway 93. The sight distances at this intersection are limited by the horizontal alignment on Highway 93. The traffic operations at the intersection of Darby Road and Highway 93 should be confirmed in the TIS. Safety issues (collision history) should be reviewed for the haul route (and intersection) to determine if there have been any incidents from the exiting Teedon Pit operations.

CRH Response

As requested, CRH commits to conducting a Traffic Impact Assessment which will assist in determining the maneuverability conditions of Darby Road and will assess the intersection at Highway 93 & Darby Road. This will be completed and submitted to the Township for review.

Burnside Response

Acknowledged. MHBC's email of August 1, 2019 notes that the applicant hopes to submit the TIS by the end of August or early September.

2. Township Comment

A scenario with 15 trucks idling close to the entrance before 5:00 a.m. will impact the functionality of Darby Road in this area. This matter needs to be addressed.

CRH Response

A scenario with 15 trucks idling close to the entrance before 5:00 a.m. is a scenario that should not occur. CRH encourages the Township to post no stopping signs along Darby Road to prevent this from occurring. CRH is prepared to cover the costs for the signage. If there are concerns related to the existing pit or proposed pit CRH remains committed to work with the Township and surrounding residents to ensure this is not happening. If required, CRH could open its gates earlier to avoid truck queuing on Darby Road.

Item #5 from the Township of Tiny Staff Report (dated February 28, 2019) notes that there is no basis given for the estimate of 20 trucks incoming and ongoing from the pit on the worst peak hour. The model prepared in the Acoustic Assessment Report identified 20 trucks (40 passes) as being the maximum amount of trucks permitted in order to comply with MECP NPC-300 for Class 2 and 3 areas.

Burnside Response

CRH Response does not satisfactorily address Burnside Comment.

The anticipated TIS report should confirm the measures proposed to address the potential for off-site queuing, as well as confirm whether off-site queuing has been observed under existing operations.

The response suggests that the noise criteria will limit the truck volume to 40 trips in the peak hour. This maximum rate should be confirmed in the anticipated TIS and set out in the site plan agreement, along with monitoring provisions to ensure that this maximum is adhered to. The TIS should also provide an estimation of the peak hour truck trips that are currently experienced at the existing pit, to provide a sensitivity analysis as to whether the future traffic impacts are expected to increase, as compared to existing conditions.

3. Township Traffic Comment

It is noted that the Township has been approached by the Sarjeant Company Limited regarding a proposal to use the existing CRH entrance for their two pits. It is the Township's understanding that no formal application has been made to the MNRF relative to this proposal.

CRH Response

The potential Sarjeant proposal is unrelated to the proposed Teedon Pit Extension. As previously discussed with the Township, this scenario would require major site plan amendments under the Aggregate Resources Act to both Sarjeant and CRH's existing Teedon Pit site plans. No application has been made to the MNRF and if ever an application was to be submitted, the Township, County, and the public would be circulated for comment.

Burnside Response

CRH Response does not satisfactorily address Burnside Comment.

The anticipated TIS report should confirm CRH's position with respect to the potential interconnection of the two pits, as well as whether such interconnection could have merit from a traffic impact perspective. It is noted that the Township does not support the joint use of the Darby Road entrance for interconnection of the Sarjeant and CRH pits.

Should you have any questions, please contact the undersigned.

Yours truly,

R.J. Burnside & Associates Limited



Henry Centen, P.Eng.
Senior Transportation Engineer
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