

Tuesday, May 9, 2017

David Pink, Director of Planning
Township of Muskoka Lakes
P.O Box 129 Bailey St.
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**RE: Proposed Official Plan Amendment No. 46
Zoning By-Law Amendment 2017-51, ZBA 13/12
Proposed Lippa Pit and Quarry**

We understand the Council will be considering at its June 16, 2017 meeting, a proposal to amend the Official Plan and Zoning By-law in favour of the Lippa Pit & Quarry application. The Skeleton Lake Cottagers Organization (SLCO) is strongly opposed to these amendments, based on the following concerns.

Traffic

The applications propose a maximum extraction level of 200,000 tonnes per year. At the maximum extraction level, the operation would generate 100 truck trips per day, or 14 trips per hour. That equates to a truck trip every 4 minutes, 8 hours per day. Most of the traffic would go easterly to the Huntsville - Bracebridge market area. The greatest impact would be to those users of Muskoka Road #3 east of Butler Mill Road.

The District of Muskoka Official Plan and the Township of Muskoka Lakes Official Plan recognize the importance of the tourist industry to the economy of the District. The District recognizes Muskoka Road #3 as a Scenic Corridor. Consideration must be given to the conflict between shipping aggregates and the use of Muskoka Road #3 as a tourist, and especially a cycling route. While the traffic impact studies examine the impact of the operation on the function of Muskoka Road #3 as a traffic route, additional consideration is needed regarding the impact of the heavy truck traffic on the character of the road as a Scenic Corridor and cycling route. Further, those of us who have witnessed the evolution of that road from a gravel road, to a surface treated road, to a paved road of varying quality, question the impact of heavy truck traffic on the quality (or integrity?) of the road. We look to the District to examine the expected impact on Muskoka Road #3 in light of its quality and function. We note that the economic impact of the proposal identifies an annual payment of \$3,000/yr to the District. This is about the same amount paid by residents of single lane private cottage access roads for annual maintenance and likely insufficient to maintain its condition under such loads.

We also note that Section 14.7 of the Muskoka Lakes Official Plan indicates that aggregate operations should be in close proximity to a Provincial Highway. We note that the operation is 14 km from Hwy 141 and 21 km from Hwy 11. If 14 km is close proximity, then the policy does not really mean that much.

Noise and Dust

The proposal includes a limitation of crushing activities within 2000 m of Skeleton Lake. Section 14.2 of the Township of Muskoka Lakes Official Plan states that no crushing operations can occur within 2000 m (2km) of the Waterfront Designation. The Official Plan defines the Waterfront Designation as being 150 m inland from the limit of the shoreline. Therefore, in order to comply with the Official Plan, the Zoning By-law and ARA license should impose a 2150 m limit on crushing operations from the shoreline of Skeleton Lake. While this distance should provide an adequate buffer under most conditions, we note that the prevailing winds in the summer months are from the north-west, potentially extending the area of impact of noise and dust. We would therefore request that, in the event that the applications are approved, the ARA license should prohibit crushing and screening on weekends June through September.

Hydrology

Our greatest concern, as clearly enunciated in the Skeleton Lake Plan and Stewardship Program, is any impact on water quality. The operation proposes to extract below the water table, requiring de-watering of the site. This requires pumping water from the quarry to Lambert's Lake Creek, which is one of the streams that feeds Skeleton Lake. The Hydrological Report and Site plan propose monitoring of water quality and quantity to ensure no net reduction in either criterion within Lambert's Creek. The mechanisms that need to be employed to achieve this objective are complicated and require constant attention and monitoring. We also note that water quality testing in the creek showed slightly elevated levels of chromium (above Provincial standards). The SLCO would like to be informed with respect to how this monitoring will be peer reviewed and, in the event that the applications are approved, would like to receive monitoring reports that are produced as a condition of the ARA License.

Finally, we are pleased to see that the Planning Justification Report contains a section (S. 13) addressing the SLCO Lake Plan and Stewardship Program. We appreciate the opportunity to review the Background Reports and provide meaningful input into this process. The SLCO would further appreciate an opportunity to meet with representatives of the applicant to have a more fulsome discussion regarding our concerns before Council makes a decision on the applications.

Sincerely,



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Skeleton Lake Cottagers Organization

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