



March 4, 2025
BCX File: 1036-21.04

The Corporation of the Town of Collingwood
Planning Department
97 Hurontario Street
Collingwood, Ontario
L9Y 3Z5

Attention: Steve Stone
Community Planner

**RE: REQUEST TO ELIMINATE D-6 ASSESSMENT FOR LAFARGE CANADA INC.'S SITE PLAN
APPROVAL APPLICATION – FILE NO. D002324**

Dear Mr. Stone,

Lafarge Canada Inc. (Lafarge) has retained BCX Environmental Consulting (BCX) to prepare this letter in response to the Town of Collingwood's (Town's) request for a D-6 Assessment as part of Lafarge's Site Plan Control Application with respect to their ready-mix concrete (RMC) facility located at 555 Tenth Line in Collingwood to recommend the D-6 Assessment request be eliminated.

BCX understands that the Town has requested Lafarge prepare a D-6 Assessment (i.e., a Land Use Compatibility Study following the Ministry of the Environment, Conservation and Parks' (MECP's) Guideline D-6) as part of their site plan approval application for updating the RMC facility on their property as noted in the minutes of the September 19, 2024 pre-consultation meeting. The D-6 Assessment was "in regard to the new concrete plan and accessory elements (i.e., truck movements and material loading and offloading, noise and dust emissions, etc.) that are in proximity to the planned residential community to the west."

The Town may not be aware that the MECP's Guideline D Series, including Guideline D-6, is only intended to apply when there is a change of land use (i.e., changing to industrial from another land use), and does not apply when there is no change in land use (i.e., remaining industrial), as described within the Guidelines. Sections of the Guideline D Series are noted below for your reference.

It is important to note that Lafarge will be required to apply for and obtain from the MECP an amendment to the facility's Environmental Compliance Approval (ECA) for air and noise emissions. As part of the ECA amendment application, Lafarge will be required to prepare air and noise reports to demonstrate compliance to the MECP's air and noise emission limits, which are conservatively set to be protective of human health and the environment. The reports for the ECA

amendment application will address the Town's concerns regarding "truck movement and material loading and offloading, noise and dust emissions."

Further, it should be noted that if the request to prepare a D-6 Assessment stands the recommendation in the D-6 Assessment will be to prepare an ECA amendment application and the associated air and noise reports.

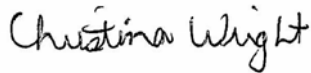
As such, we respectfully request that the Town eliminate the requirement for Lafarge to prepare a D-6 Assessment as it is not applicable in this situation and will only add burden to both Lafarge and the Town, ending with the same result in submitting an ECA amendment application to the MECP.

Please contact Christina Wright by email at cwright@bcxenvironmental.com or by telephone at (416) 895-8386 if you require any further information.

Yours truly,

BCX ENVIRONMENTAL CONSULTING

Per:



Christina Wright, M.Env.Sc., EP
President & Managing Consultant

cc: Mark Schutzbach, Lafarge Canada Inc.
Kristine Loft, Loft Planning Inc.
Lindsay Ayers, Manager, Planning, Town of Collingwood

Qualifications

Christina Wright has over twenty-five years of experience in air quality and environmental compliance consulting. Ms. Wright has prepared many Guideline D-6 Land Use Compatibility Studies and numerous ECA applications for ready mix concrete plants. Ms. Wright is well qualified to prepare this letter.

Guideline D Series References

Guideline D-6 Compatibility Between Industrial Facilities and Sensitive Land Uses, Synopsis applicable section (page 5):

“The guideline is intended to apply when a change in land use is proposed, and the range of situations are set out in Section 2.0 “Application” of Guideline D-1.”

Guideline D-1 Land Use Compatibility, Section 2.0 Application

Section 2.2 “The guideline applies when a change in land use places or is likely to place sensitive land use within the influence area or potential influence area of a facility.”

Section 2.3 Non-Applicable Situations “This guideline does not apply to situations where incompatible land uses already exist, and there is no new land use proposal for which approval is being sought....NOTE: When there is a compatibility problem where both land uses already exist, matters may be subject to Ministry abatement activities if there is non-compliance with a Ministry issued Certificate of Approval (CofA) for the facility, or there is no CofA in place.” [NOTE: Certificate of Approval or CofA is the previous name for Environmental Compliance Approval or ECA.]