



Office of the Mayor

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March 29th, 2021

Minister of Environment,
Climate Change and Municipalities
P.O. Box 8700
St. John's, NL A1B 4J6

RE: Proposed Undertaking for Flat Bay Gypsum Tailings Processing

Dear Minister,

I write today on behalf of the Town of St. George's and its residents regarding the Proposed Undertaking for Flat Bay Gypsum Tailings Processing. In our submission we have included letters from our residents with their concerns related to this Proposed Undertaking. The Town is supportive of Industry especially as it pertains to job creation and the benefit of healthy economic growth. However, we do not support a lack of concern for our residents and their well being which is directly impacted by this very industry.

Over the past 5 years we have dealt with the owners of Turf Point Resources from where the gypsum tailings will be shipped if the undertaking for RMR is approved. The tailings will be trucked through this town adding considerably to the number of haul trucks currently travelling the narrow provincially owned roads from April to November yearly. We have met on several occasions with the owners of Turf Point Resources regarding the impacts that hauling of aggregates/gypsum has had on our community. The meeting outcomes were generally positive with an approach to lessen the adverse affects on our residents, sadly the measures needed were not always implemented and when they were the owners had to be reminded to follow through.

In 2020 prior to the haul season commencing the Town was able to secure enough liquid calcium for application to the Turf Point Resources privately owned haul roads for a nominal cost, they refused the offer, feeling that it may not work or last any amount of time. This was the same quality liquid calcium that is applied to portions of the Labrador Highway which is still gravel. The Town has entered into several tax agreements with Turf Point Resources (formerly Western Logging) up to and including 2020. I've added this information as it speaks to the support that the Town has provided to this industry.

During the 2020 haul season we asked that on fine days that the haul roads be watered hourly to lessen the dust and its effects on our residents, they said that they would hire a full-time employee to water the roads, yet they had to be constantly reminded by this office to comply with the watering. We also asked to have the gate locked on the upper portion of their haul road that leads to Flat Bay as the residents in that area were dealing with noise pollution from early morning to late night along with the constant dust.

Hauling in town generally is completed by 6:00 pm in the evening, however with the gate left open residents and the public use that portion of the road for vehicular and ATV travel. Residents have witnessed drag racing on that strip along with excessive ATV use. We verbally requested and officially requested by written correspondence to have the gate closed and locked daily, however the gate wasn't locked until late November when they ended the haul season and was recently opened within the past month.

This undertaking will exponentially increase the noise pollution, air pollution particulates, and all other associated safety risks including an increased number of haul trucks fully loaded/overloaded travelling through this community. The provincial roads have deteriorated over the years and more particularly during the past 5 to 7 years. Route 461 is a narrow paved road with gravel shoulders along with a sidewalk through the Town Center. Water and sewer infrastructure runs along the same route, the constant weight of these trucks has seen increased breakage of this infrastructure.

The dust levels that residents along the haul route have to endure is excessive, in the undertaking there is meager reference to dust control and is comprised solely of water application. Water application is not enough as this dust greatly impacts the quality of our residents lives. Imagine for a moment not be able to open your windows for six months a year or have to dust everything in your house if you by chance open a window through the night and then forget to close it in the morning and left it open throughout the haul day. It is safe to say that you would spend the next week washing clothes and cleaning a layer of dust that is unimaginable to those that are not subjected to this. As stated earlier in this letter water application is promised but not always delivered. The water application also causes wet gravel to be carried onto the paved road.

The haul road from Flat Bay to the pier is privately owned by Turf Point Resources, there should be no use of the main road through town (Main Street/Route 461). Hauling from Flat Bay can be achieved by utilizing a long standing haul road by all haul trucks for this undertaking. In making the haul road a condition it would certainly help to lessen many residential fears, as it is apparent that these haul trucks often do not obey the rules of the road, especially the 30km school zone which contains two crosswalks. Staff and residents have often seen first hand the excessive speed of these truck through our school zone. Children walk along this same stretch of roadway to and from School and the one and only playground. If something doesn't change it is only a matter of time before a critical accident happens. Further to this, there has been many near misses we are aware of with pedestrians and local traffic, many of our residents have felt their safety is at risk with the rate of speed the haul trucks travel at. The use of Jake brakes is another contentious topic, the haul trucks travel down Steel Mountain Road, these trucks start early morning and there is no rest for our residents in that area throughout the haul season.

It appears that the haul trucks are overloaded, on several occasions there has been gypsum found on our roads throughout the haul season and we've fielded several complaints about the same from our residents and the public. I'm fully aware that the tarping of haul trucks is based upon the size of the aggregate but this is another issue that warrants examination.

Another critical issue is the blow off from the piles of gypsum/sand/aggregate at Turf Point, the households within close proximity of the prevailing winds has to deal with excessive dust coming off of these piles. Again, these residents have had to endure a staggering amount of dust over the years.

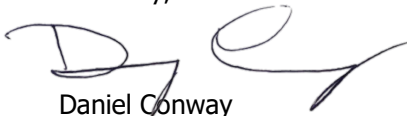
Our resident's health and welfare are of the utmost importance when we look at any development or undertakings that affect the Town of St. George's. At this juncture we do not know the long term effects of the cumulative road dust & gypsum particulates that's been inhaled by our residents but from a layman's point of view we are sure it can't be good for ones overall health.

It is our hope that this project is approved, however it is critical that some conditions must be met, such as:

1. The haul trucks would be required to use the privately owned haul road only;
2. That the haul road be treated with liquid calcium to reduce dust;
3. That watering of the haul road be mandatory (a minimum of 500 meters on either side of residential homes), hourly on dry days (when it's not raining) and that any residual gravel that's left on the paved road be swept off daily at regular intervals;
4. That a spray mechanism be installed at the pier to water the piles of gypsum/sand/aggregate thus reducing dust blow off;
5. Lastly that a Health & Safety Plan for the haul season be provided to the Town of St. George's and that it be implemented with oversight throughout the haul season.

I stress that we are supportive of industry and all businesses. It is our duty as a Council to be the voice of our residents an advocate on their behalf. Many of our residents have spent years dealing with the issues we've brought to light in this correspondence and it is our sincere hope that you will take this into consideration along with the attached residential letters.

Sincerely,



Daniel Conway
Mayor
Town of St. George's
709-649-3656

Enclosures (9)