



Glenholme Pit 4 Quarry Expansion Project
Environmental Assessment Registration Document (EARD) -
Comments from Ecology Action Centre

July 2024

The Ecology Action Centre is an environmental charity based in Mi'kma'ki/Nova Scotia. We have a leadership role in working on critical environmental issues from biodiversity protection to climate change to environmental justice. We strive to equip human and ecological communities for resilience and build a world where ecosystems and communities are restored and not just sustained.

Ecology Action Centre staff have only been able to comment on some aspects of this EARD. This is in part due to the limitations of our expertise – we only hold knowledge in certain subject areas and have commented on those. Our limited ability to comment is also caused by the 30 day public comment period being too short to comment completely on any EARD, including this one. Public comment periods for EARD should be 60 days, minimum. Additional time would have allowed us to hone our comments further and make additional, relevant comments.

Overall comments

Overall, this EARD is not complete. In every section the proponent states conclusions without supporting rationale or any other evidence to justify their conclusions. This is especially disappointing because the existing quarry and years of operation provide ample opportunity to gather data about how the site's operations have been affecting wildlife, water quality, residents, and more. This information could have contributed to a more complete EARD. We believe the proponent should gather and analyze relevant data that has already been collected about the project site and apply their findings to produce a useful EARD.

Since the EARD does not meet the minimum requirements for suitably analyzing Valued Ecosystem Components (VEC) for their potential to be impacted, and because relevant, site-specific data has not been incorporated, we believe the Minister will not have the information in front of him to make a determination about the project.

Specific comments

Sections from the EARD are underlined.

Pages numbers refer to the page numbers in the EARD.

Direct quotes from the EARD are in quotation marks.

2.4 Consideration of alternatives

Pg. 19 – The project proposes to build a new access road, where the new proposed access line may also be built. The proposed new access road would be 10m wide and be 275m long, extend from Pit No. 4 to Little Dyke Road, and could cross 1 wetland and 1 “ephemeral” stream where a culvert will be installed. The proponent then downplays an alternative route, which was requested by the community, heading to the north from Pit 4 directly to Highway 2. This would reduce noise and dust impacts to residents on Little Dyke Road. The proponent states that this alternate route would impact a different wetland and watercourse, and have other impacts. The proponent should map and describe in more detail the alternate route, including calculating impacts to wetlands and watercourses if the alternate access road was built. The power line connection can instead be brought in from a different point, such as the proponent’s Pit 2 property. **Without this genuine analysis of an alternative access road heading directly to Highway 2 the proponent is failing to truly examine a viable alternative that could reduce impacts to the environment and the community.**

Another alternative means of carrying out the project that was not fully considered by the proponent is to put some of the quarry infrastructure and activities indoors. The proponent proposes to more consistently crush rock at Pit 4, which both creates additional dust and noise at the site, impacting the nearby environment and residents. This activity and other quarry activities proposed to increase at the property could be done inside a purpose-building facility or building, as is done at other quarry and processing sites. This is especially important because the proponent is proposing (outside of this EA) to bring in rock from other sites to process at their crushing facility at Pit 4. **Without examining the viability of having crushing and other process activities inside a facility instead of out in the open, the proponent has not considered a reasonable alternative means of carrying out the project that could reduce impacts to the environment and the community.**

Figure 2.4

Pg. 21, Figure 2.4 – Project Setbacks – The legend has an error; it does not show what the features delineated with green hashmarks represent in the map. This should be corrected, like to state that they are Field Delineated Wetlands.

2.7 Environmental Management

Much of this section should have included findings from the proponent's own environmental management at the site.

Pg. 24 – Dust and Noise Control – What is presented in the report is too simplistic and lacks any substance. This section could have been and should have been informed from the proponent's direct experience of attempting to control dust and noise pollution at the site. The proponent could have included actual noise level readings at the site, or descriptions of complaints about fugitive dust from the site. **Additional information from the proponent regarding specific dust reduction and noise reduction measures that have proven successful at the site should be provided,**

4.2 Environmental Assessment Methods

Pg. 40 – “Cumulative environmental effects are also assessed for those VECs for which a residual environmental effect was predicted (whether significant or not).”

Cumulative environmental effects were actually not assessed at the VEC level, or really examined at all.

5.1 Project Interactions with the Environment

Pg. 42, Table 5.1 – Project-VEC Interactions – **This table should have scoped in the VEC Fish and fish habitat, Vegetation, and Wetlands as having the potential to experience Project interactions during the Operation and Maintenance Phase.** In the rationale section below the table, the proponent notes that: “Emissions of particulate matter (particularly dust), light, and combustion gas, related to project activities may occur during construction activities (site development) and operation and maintenance activities (resource extraction and processing) and affect the atmospheric environment or adjacent receptors.”

Dust, light, and gas could impact fish, vegetation, and wetlands during operation and maintenance. Other operation and maintenance activities leading to noise could also impact fish. Dust is also known to impact vegetation, and dust will be created during operation and maintenance. Also mentioned later: “During operation, there will be a reduction in surface water drainage toward a wetland to the south of the PDA.”

Pg. 43 – This section states that the construction phase “will require the loss of up to 5.4 ha of wetlands.” However on page 86 of the EARD the proponent states that “The Project will result in the direct loss of 2.43 ha of wetland within the PDA.” **The EARD should be more clear and consistent in stating and mapping the location and area of wetlands that may be altered, and wetlands that may be completely removed.**

Pg. 48 – 6.1.1.3 – Spatial boundaries – “For the atmospheric environment, the LAA includes an area consisting of a 2 km radius centred on the PDA and includes the PDA and adjacent areas where Project-related environmental effects could be expected to occur. Beyond this radius, based on experience with similar facilities and professional judgment, emissions of air contaminants and noise from the Project would not likely be distinguishable from background levels.” **The proponent should provide at least some evidence, from their own site, or from the peer-reviewed literature, that effects on the atmospheric environment are limited to a 2km radius.** There are surely peer-reviewed articles or reports on air quality testing near quarry sites.

Pg. 49 – Ambient Air Quality – “The Northern Air Zone has a ‘yellow’ management level, meaning management actions are focused towards preventing air quality deterioration.” **The proponent should describe how the additional dust created by continuing and expanding the quarry does not deteriorate air quality in the Northern Air Zone.**

Pg. 52 – 6.1.2.3 – Light – More work should be done to describe the impacts of light pollution on birds and insects. There are actions that can be taken to reduce these impacts, but they are not discussed in the EARD. **The proponent should describe their own efforts to reduce light pollution at the existing site that have proven to be helpful.** The proponent should discuss if residents around the project have complained about light pollution and what the proponent did about these concerns. The proponent should elaborate on how “occasional night-time operations” lighting differs from the usual lighting at the site.

Pg. 53 – 6.1.3 – Potential Environmental Effects – **The proponent should describe how light during night-time operations can also affects bats and insects.** This is done in other EARD in Nova Scotia – the information is out there.

Pg. 53 – “Monitoring of airborne particulate emissions (dust) is being conducted for current operations at the existing Pit No. 4 at the request of NSECC and in accordance with the Nova Scotia Pit and Quarry Guidelines.”

The proponent should describe whether they have been successful in meeting all air quality related maximum permissible levels over the years of monitoring at the site.

Pg. 54 – 6.1.5 Residual Environmental Effects – “With the application of mitigation measures, the effects of combustion gases are not expected to be substantive.” **The proponent has not provided any rationale to support this statement.** No predicted level of emissions of combustion gases from the fossil fuel-powered heavy equipment and vehicles at the site are provided, and there is no comparison to what “substantive” emissions would be.

The same baseless assumption is made for greenhouse gas emissions.



Pg. 55 – 6.1.6 Summary – “In light of the above, and in consideration of the nature of the Project, its anticipated environmental effects, and the implementation of mitigation and best practices that are known to reduce environmental effects, the residual environmental effects of the Project on the atmospheric environment during all phases of the Project are rated not significant, with a high level of confidence.”

Again, the proponent has provided no basis for these assumptions, including why the proponent has a “high level of confidence” ‘in their estimation of no residual environmental effects.

6.4 Fish and Fish Habitat

Pg. 74 – 6.4.2.2 Desktop Analysis – Was Ducks Unlimited Canada contacted as a neighbour, stakeholder, or knowledge holder? They may have information about the fish and fish habitat in watercourses.

Pg. 75 – 6.4.2.3 Fish Habitat – Which fish species were observed in WC1?

6.5 Wetlands

Pg. 84-85 – 6.5.2.2 Assessment of Wetlands of Special Significance – Black Ash found in W8 (no alterations planned), Canada Warbler in W7 (no alterations planned). **These wetlands should definitely be upheld as Wetlands of Special Significance and should not be altered, including as a result of further expansions of the quarry, or through any wetland alteration permit.**

Pg. 85 – 6.5.3 – Potential Environmental Effects – “The construction and operation and maintenance phases of the Project will result in the alteration of approximately 5.4 ha of field-delineated wetlands within the PDA” conflicts with the statement on page 86 that “The Project will result in the direct loss of 2.43 ha of wetland within the PDA.”

Which portions of wetlands will be lost versus which portions will be altered?

Pg. 89 – 6.6.2.2 – Desktop Analysis – There are multiple records of Blue Felt Lichen within 5km of the centre of the PDA. This is a Species at Risk. **Why wasn’t a lichen survey conducted for the property?**

6.7 Wildlife and Wildlife Habitat

6.7.2.1 Birds

Pg. 98 – Table 6.11: Bird SAR Screening withing the LAA – Bank Swallow and Common Nighthawk (both SAR) could nest and forage in the PDA. These species do nest at other quarries. The proponent should describe any wildlife monitoring at the existing site that resulted in the observation of these species. **It is possible to put in Terms and Conditions of**

a potential EA Approval, or in the Industrial Approval, the requirement to survey for nesting Bank Swallow and Common Nighthawk at the site, during the appropriate time of year.

6.7.2.3 Herptiles

Snapping Turtles and/or Eastern Painted Turtle can nest at quarry sites. These species were observed just outside of the 5km radius of observations provided by ACCDC. Local residents have seen these species near the quarry property. **Any Terms and Conditions of a potential EA Approval, or in the Industrial Approval, should include the requirement to survey for nesting Snapping Turtle and Eastern Painted Turtle, at the quarry site, at the appropriate time of year.**

6.8 Socioeconomic Environment

Pg. 112 – 6.8.3 Potential Environmental Effects – “Construction of the Project and extracting activities during operation have the potential to affect nearby residences as a result of light, noise, and dust generated by equipment operation. The Project may have a negative effect on residential property values due to elevated noise levels as well as perceived effects on aesthetic value of the area. Effects on the single home-based business (if in existence) are expected to be similar to those on residences in that vicinity. It is not anticipated that the effects from the proposed Project will be significantly higher than the effects from current operations. With the addition of an on-site electric plant, the Project may lead to a reduction in truck traffic which would have a net benefit effect on nearby residences.”

There will be changes associated with the expansion of the quarry which could effect residences and home-based business in new ways. Quarry operations would be closer to residences on the west side of Little Dyke Road. Also, a new access road is proposed for the west side of Little Dyke Road. Both of these activities would predictably increase the light, noise, and dust pollution received from the quarry operations, and from trucking. This could have effects on people, and property values. **The proponent should use actual data to predict effects, and commit to mitigation actions, for the increase in light, noise, and dust pollution that the west side of Little Dyke Road would experience.**

Pg. 113 – 6.8.4 Proposed Mitigation and Management Measures – “Truck drivers will adhere to posted speed limits and warning signage and adjust driving to meet weather and road conditions.”

Speeding and unsafe driving has repeated occurred along Little Dyke Road involved trucks going to the site, including with tickets being issues to drivers. **The proponent should commit to new management measures to address this existing problem. Clearly existing management measures are not working.**

Pg. 114 – 6.8.5 Residual Effects – “Effects on property values are more difficult to determine, since the literature relating property values to proximity to industrial facilities is

uncertain. Some studies suggest that proximity to an industrial facility may result in a decline in property values due to nuisance effects and potential damage, whereas others suggest that property values may increase if present near an industrial operation because workers tend to wish to live near where they work. As such, given this and the fact that the Project represents a continuation of current conditions, the anticipated effects of the Project on property values are described as neutral.”

The proponent should do the work and refer to some of the actual research and local data on this topic. The proponent could also examine local property values close to the quarry, and at a set distance away from the quarry. The assumption that increased use of the Pit 4 site is a “continuation of current conditions” is not accurate, and the conclusion that effect on property values are “neutral” are baseless.

Pg. 115 – “The Project may result in a modest decrease in traffic volumes on the preferred transportation route during operation. Residents located along the preferred transportation route may notice truck traffic at times, but since the highways are rated for such purposes and trucking has occurred and continues to occur on these roads, measurable impacts on transportation are not expected.”

The proponent should discuss the impacts on local roads as a result of their operations. Have the local roads used frequently by the proponent been repaired or repaved as a result of their operations?

Pg. 156 – 10.0 Potential Cumulative Environmental Effects – **The proponent has not completed a cumulative effects analysis.** This is one of the most lacking sections in the EARD.

