

Agnes and Doug Gutzmann

Calgary AB, T3R 1E1

March 6, 2025

Attention: Laura Friend, Manager, Board Reviews
Natural Resources Conservation Board

Subject: **Letter of opposition to the proposed application for the SCOTT PIT PROJECT proposed by Heidelberg Materials Canada Limited**

As homeowners of a property in Crestview Estates, which is directly adjacent to the proposed gravel mining operation, the undersigned strongly oppose the proposed re-designation application and proposed gravel extraction and processing operation.

Our key concerns and objections to this application / proposal are as follows:

1. **Heidelberg Materials Canada has made multiple unsuccessful applications to obtain approval for the proposed gravel operation.** These applications by Heidelberg (previously under the name of Lehigh Hanson) were made to Rockyview County and were all unsuccessful because gravel extraction and processing operations are simply not appropriate in this location. Our specific concerns, many of which were echoed by other residents and ultimately Rockyview Council, are highlighted below.
2. **Rockyview County is in the process of finalizing the Aggregate Resource Plan (ARP) which is based on extensive consultation with industry-, residential-, agriculture-, and environmental representatives and contains the areas of consensus of all these representatives. The ARP does not support gravel extraction at the Scott property.** Heidelberg wishes to go ahead with a gravel operation at the Scott property despite clear consensus from representatives, including industry representatives, that this is not a suitable location.
3. **The lack of transparency and trustworthiness of the applicant.** In addition to Heidelberg's attempt to circumvent the Rockyview ARP, there have been many examples where the applicant has made inaccurate claims or minimized the effects of a gravel operation. Some examples are as follows:
 - a. The claim that aggregates are in short supply is false. There is an abundance of rock available in far less densely populated areas that the applicant could access with less community and environmental impact.
 - b. The claim that the applicant has listened to and addressed the concerns of residents is false. Residents have strenuously opposed and raised concerns at every public engagement opportunity, including cumulative effects, noise, dust, traffic, and

environmental concerns. Yet, the applicant has still submitted a proposal with inadequate consideration for residents' concerns.

4. **The cumulative effects of an additional aggregate operation in the immediate area.** There are currently 4 other operating gravel mines to the immediate east and south of the proposed operation that generate undesirable industrial noise, dust and truck traffic. Adding yet another operation to the existing ones would further exacerbate the negative issues Bearspaw residents must contend with. Under no circumstances should an additional gravel extraction operation be approved in the Bearspaw vicinity before the existing operation sites are depleted and reclaimed. This recommendation has been raised previously to the applicant's attention as a critical concern at multiple public engagement events.
5. **The Industrial noise generated by the proposed gravel extraction, processing, and conveyor system.** The residents in the Bearspaw community have chosen to live in this location for the peace and quiet of a pleasant rural community where the pleasant sounds of leaves rustling, frogs singing, ducks calling, chickadees chirping, and coyotes calling can be enjoyed. The unpleasant industrial noise of the proposed gravel extraction operation would destroy the peace and quiet and drown out the pleasant natural sounds residents currently enjoy. In addition to the noise generated by extraction and processing operations, a long-distance over-land gravel conveyor system would add continuous machine noise, as is already demonstrated by the increasingly noisy conveyor system at the Lafarge pit near 144 Ave NW and 85 St NW.
6. **Aggregate dust in the immediate vicinity of a residential community.** The dust generated by a gravel extraction operation at this site would have serious health impacts on the many nearby residences and is of particular concern in the Crestview community. As Lehigh's "Air Dispersion Modelling Assessment" shows, the level of particulates / dust in the Crestview community (**0.3 km** from Scott Pit) is far greater than dust levels at the Farm (144 Ave and RR23; **2.6 km** from Scott Pit). For example, compare the summer case of Total Suspended Particulates (TSP) from the project of **61.4 & 34.7 ug/m³ in Crestview vs 2.4 at the Farm**. It is clear from this (and many other factors) that a gravel operation in close proximity to the many Bearspaw residences is simply a terrible idea.
7. **The proposed setbacks from residential neighbors are inadequate.** Despite the assurances of the applicant that they will mitigate noise, dust and visual impacts, monitoring negative impacts with defined limits does not provide adequate assurance to the community that negative impacts will be sufficiently mitigated:
 - a. The proposed limits allow numerous and serious negative impacts that would not otherwise be present (additional industrial noise and dust, for example).
 - b. As we have experienced with other near-by gravel operations, operators are not able to guarantee that they are able to consistently operate below limits.
 - c. Residents have very little recourse to address situations where their quality of life is impacted by operations exceeding defined thresholds due to weather, equipment malfunction, or other unforeseen circumstances.

For these reasons, the monitor-and-mitigate approach proposed by the applicant is not adequate to prevent serious negative impacts on the residential community. The only way to mitigate serious

negative impacts with any confidence is the requirement of reasonable setbacks between aggregate operations and residential properties. The setbacks of 100m and 150m proposed by the applicant are simply inadequate; minimum setbacks from residential properties of 1500m to extraction or processing operations would provide a more reasonable degree of confidence that the negative impacts of extraction operations would be minimized.

8. **An increase in truck traffic can not be accommodated on current roads.** Although the proposal claims that incremental truck traffic would be minimal, any additional truck traffic on the roads in this area is a concern. The Bearspaw, Spy Hill, and Royal Oak areas are already dealing with a problematic level of truck traffic.

Please feel free to contact us directly if you have any further questions.

Best regards,

Agnes Gutzmann and Doug Gutzmann
(contact info. above)