

## NOTES REGARDING ZONING AMENDMENT C37-24

We collectively would like to express our concerns about the zoning amendment proposal which would allow Mr. Frey to change the purpose of his approved “1784 square meters storage shed/home industry” to allow for the manufacturing of organic soil additives and future possible grain drying.

After thoroughly reviewing the amendment and conducting our research on soil additives, grain drying and increased heavy traffic we have collectively generated a list of our main concerns and itemized them in detail below.

Although the dry powder does not have a strong odour. Our research shows that the product is derived from dried microbes (single celled proteins) and some blends contain amounts of ammonium. Since the proposed property is very close to protected creeks/drainage lands we cannot be sure, without a study, that this will not affect our water. Nor do we know if once the secondary bi-product oil is added whether or not there will be an odour.

We are extremely concerned about the numbers provided surrounding increased truck traffic and the noted lack of a traffic study concerning this application, for the following reasons: The dry powder is being trucked from an unknown facility 3 hrs South-West of this property. After the oil has been added the finished product **cannot** be sold by Mr. Frey to local farms but will be shipped back out to Brantford, ON (Good N’Green). **So does this really benefit Southgate?**

On page 2 of the proposal it is stated “**...About 60 40-tonne trucks per year will be delivering the unfinished product to the Frey farm, and about the same number will be hauling the soil additive away.**” This means 120 x 2 trips past our homes. You then go on to state on page 5 that “**the business will involve approximately 60, 40-tonne trucks per year, which averages to just over one truck per week.**” And continues to then mention that “**NO traffic impact studies are required.**”

It then states that “**half-load restrictions will be in place during the spring melt period**”, yet there is no mention of this causing an increase in trucks coming in and out, in theory, doubling the amount trucks at that time.

There is also mention of the vegetable oil additive which is required to complete the process, yet there is **no mention of how many trucks will be required to bring the oil in** and out. Nor any mention of how or where it will be stored.

Based on the number of trucks we were able to loosely calculate based on ALL of the information in this application, we feel that stating “**...which averages to just over one truck per week,**” was intentionally misleading.

**Furthermore, Organic Soil Additive manufacturing in Ontario is generally seasonal** so no trucks will be required during the colder months. Based on our research, **organic fertilizer is generally applied at sowing, or no later than 20 to 45 days after sowing**, which would all be during the **spring months**, requiring half loads as mentioned above.

To be generous, it is our estimation that over **6 months (actual farming season)**, in approximately 24-weeks, this would be (being very modest) 320 or more trips travelling on this road past our homes, all during the time when we are outside trying to enjoy our properties. This is a lot of wear-and-tear on a road that **has not been resurfaced/paved since 2001**.

We have found out during our research of this amendment proposal that there is also an application for a new **Mennonite School** to be built approximately 1.5-2 km down this same road. Do we need to mention there will be an increased amount of small children walking this road. As well the spring and summer months increase the amount of pedestrian/cyclist and horse & buggy traffic during this time.

We feel the above information is a more accurate estimate of the increase in traffic and are requesting a **proper traffic impact study**.

**Elevation (see photo enclosed)** - As a continued concern regarding the increase in traffic we felt it is important to mention the elevation of Southgate Sideroad 41. (Just a side note to mention descending hills is typically when trucks are the noisiest). This road currently has a speed limit of 60km/h which then increases, at the southwest corner of the subject property, to 80 km/h. Please note that this also sits at the crest of a steep hill which is blind on both sides to oncoming traffic. **Has this been taken into account when deciding to NOT move forward with the traffic study?**

There is a lot of confusion around the zoning and classification of the subject property and proposed building. Page 1 refers to the property in question as a **“farm”**. Page 3 states that the property is zoned as **A1-301 with special provisions and EP (Environmentally Protected)**. Then throughout the proposal it is referred to as **“agricultural-related”**. It goes on to state on Pg. 7 section 3 that **“...with regard to the Province’s D-6 Guidelines, please consider the following: The soil additive operation should qualify as a ‘Class I Industrial Facility’.”** then it goes on to state **“the grain drying operation should also fall within the ‘Class I Industrial Facility’ category.”**

The amendment to the Zoning By-law presently limits a **Home Industry** use to **100 square meters of floor area**, however, the proposed building is stated to be 1,737 sq. meters. This would not be anything but an industrial manufacturing facility which coincides with the Provincial D6 guidelines classifying it as industrial. **Page 4 (c) additional permitted uses shall be the making of soil additive products and grain drying. By adding the words “Grain Drying” it can be identified as “agricultural-related” and, therefore, the building size could be significantly larger.** As explained in the proposal on page 5 **“An agricultural-related use is not limited in size by this policy”**.

The terminology used to describe this proposed operation is **extremely inconsistent** throughout the proposal and would not be conducive to the current A-1 zoning. Allowing the A-1 use to continue with these significant amendments is of major concern given that the Comprehensive Zoning By-laws allow for agricultural-related uses to be permitted **without requiring the landowner to go through the Zoning By-law Amendment process**. It is my understanding that this gives us **no voice or recourse for any expansions Mr. Frey chooses to make in the future**.

Given the sheer size and structure of the proposed “shed” it would only make sense that Grain Drying will take place in the future, and as such, should be given more weight in the proposal. Grain drying would require even more storage silos, and contrary to information provided in the application, the drying process produces “intense noise” as was stated in the *Experimental Study of Grain Dryer Noise Emissions* by the University of Guelph.

In The *Experimental Study of Grain Dryer Noise Emissions*, it states “Grain dryers and related equipment can be one of the most intense noise sources in agricultural operations...” and goes on to say “The fans and burners in grain dryers have been observed to produce sound levels from 85 dB(A) up to 112 dB(A).” It also makes special note that **“Environmental noise pollution from stationary sources can also have significant impacts on neighboring land uses and residents, including a range of potential health and psychological impacts.”**

Given this information, naturally, we are all concerned that if the property remains under the A1 zoning with this amendment, it will allow for future grain drying without any information being provided as to the environmental, traffic, and noise concerns of these types of grain drying operations, and will allow Mr. Frey to **Is Mr. Frey currently, or will he be covered under the OFA and protected under the Ontario Farming and Food Production Protection Act?** Without do so **“without requiring the landowner to go through the Zoning By-Law Amendment process”** again. Not to mention that although Mr. Frey states (see page 6) that should he decide to add grain drying to his business in the future, the noise should not intensify since the dryer will be located **inside** the building. Our research shows “grain drying is a significant fire hazard and should **NOT** be done inside a storage facility,” as is being suggested. This should also be given higher consideration due to the presence of the oil for organic soil additive manufacturing since, as we all know, oil and fertilizer are extremely flammable. So is having the grain dryers inside really feasible?

It is our opinion that, realistically, Mr. Frey is hoping to expand the Fertilizer business (per his discussion with us January 16th.) Despite that this proposal claims multiple times that Mr. Frey wants to keep it **“small”**, which seems unfeasible.

**Is Mr. Frey currently, or will he be covered under the OFA and protected under the Ontario Farming and Food Production Protection Act?** Without any studies or detailed information provided in the current application in regards to the “grain drying” portion, residents could be left with **no recourse** should these operations grow significantly in size.

**Currently, it appears that no further permissions or applications would be required, as previously stated, for the grain drying expansion ... would this be correct?**

It is common knowledge that a facility of this size so close to residential homes negatively impacts property values. The surrounding residential homes are currently valued between \$850 - \$1.25 M (many of which were purchased within the last 5-10 years with the vision of quiet, country living.) After conferring with professional real estate agents in the area, due to the incomplete information provided in the Amendment Proposal we've been provided, it was undetermined as to exactly how much a facility such as this would affect our property values. However, it was roughly estimated to cut values by approximately \$50,000 - \$200,000 depending on the property in question.

Collectively the nearby Rural Residents are contributing approximately \$120,000.00 or more per year in Property Taxes, which you are happy to collect. So we feel our input should be heard and considered. It should also be noted that in the short time we were given (between the time the Amendment Proposal was mailed and the meeting January 22nd) **approximately 95% of those contacted were AGAINST this proposal** which speaks for itself.

In conclusion, it has become abundantly clear there is simply not enough information provided, nor data collected, to justify the passing of this application amendment. We feel that the **information that was provided was misleading and incomplete**, to say the least.

We are asking the council to please consider all of the points mentioned herein, and **to provide us with a revised copy of the application amendment, including traffic, noise and environmental impact studies before making any concrete decisions.**

Thank you.

Sincerely,

Ron & Kathleen Fink

(and those listed on the petition already supplied)

