

REAL people
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Rideau Environmental Action League

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P.O. Box 1061
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Bus. No. 137673687RR0001

November 28, 2014

To:
Town of Smiths Falls
PO Box 695, 77 Beckwith St. N
Smiths Falls, Ontario
K7A 4T6

**Subject: Comments regarding 1 Hershey Drive rezoning.
Attention: Nicole McKernan**

Nicole,

Thank you so much for the wonderful job you and all of staff and Council did in hosting this meeting and just as big a thank you to all the residents who came out and the proponents who presented the proposal.

The concerns that were raised by the members of the public were valid with the limited knowledge we had of the proposal up until the meeting. However, with the information that was presented coupled with research that REAL has conducted into the process and current operating sites, much concern has been dissipated. These concerns were related to the following four themes:

- A) That the site would become more of waste disposal site than an industrial site. The fact, and the proposal, are that all products will be stored indoors, or on trailers in a caged parking area with security arrangements. This will limit the possibilities of an uncontrolled event like fire or ground water seepage contamination. Additionally, the MOE&CC will set minimum separation distances between trailers which would slow down the ability of a fire to spread.

Couple both of these steps with a proper site plan agreement for storm water management and buffering and this site can be managed. The result will be that water does not immediately get released into the town's system and with a little bit of planning which this developer seems open to exploring with his concerns for the environment, it is very possible to create a "RAIN" system through Green Communities Canada and REAL in which almost no storm water enters the Town system from this industry.

- B) That fumes would be overwhelming and noxious. This system, especially at the limited start up rates, would have very limited odours, if any, as the main gases released have no odour. Carbon dioxide and methane only have a scent if it is added to the product so people would be aware that it was around. In fact, from reports that REAL has received from colleagues in Whitehorse in the Yukon who visited this facility this past week, there was no noticeable odour detectable at all.
- C) That property values will decrease, this type of facility does not belong in the area being considered and/or jobs being created are not significant. This argument is often brought out during various complicated issues. The fact is that property values are not decreasing around such locales. If so, houses could not be given away around the Carp landfill site or underneath an airport approach path. But these prices have continued to increase through the years. REAL is not saying that it may not be slower growth in pricing in that area, just that the average house sells for more than it was bought for originally. Next, does the project belong here? The fact is that this land is already zoned industrial and many a community would have considered there to be no need for a rezoning. Many a town would declare that there is no doubt this is simply an occurrence of an industrial application that was not envisioned when the zoning was passed. Few planners or municipalities would declare that this is not an industrial use. As currently understood by REAL, this land is zoned M2, some of the included uses are very similar and there is not a large leap in imagination for this process to be considered as or similar to a processing plant, and assembly or manufacturing plant, a fabricating plant or a fuel transfer facility. These are all uses that are acceptable with no need for a rezoning. However, REAL does once more congratulate the town, the proponents and those with concerns for being upfront and transparent in this endeavor to recognize the development for its unique properties. Lastly, as for the jobs created; even one job for a person who is currently unemployed whether they are young or old is welcomed and needed. These situations have a way of benefiting a community much more than just the jobs at the facility. An example would include that transport drivers now will have another product which needs to come back to Smiths Falls and they were coming home anyways. Others that would benefit are the peripheral businesses such as restaurants, landscapers and security firms.
- D) That this is not a proper use of repurposing a product and the technology is untried. This has, in the past, been a stumbling block for most environmentalists as past processes have often not been in a contained system which resulted in more pollutants being released and often the product was being burned or consumed for heat or energy only. In this case, the system will be extending the life cycle of oil already refined and extracted. Understand this: in a perfect world

there would be much less plastic to recycle in this manner or any other method of recycling but until that time there is no doubt that this facility will allow for oil/plastic to be more fully utilized and used by society. Much like the merchandise purchased at the REAL Deal Reuse Store, the product is simply and temporarily being diverted from landfill as the repurposed product still has value. Thus, these plastics will have an additional value and greater use potential. As for this technology, after talking with the proponents and confirming their preferred brand and model, this technology is new but hardly untried. This brand is very scalable and workable in four-tonne increments and a dealership/wholesaler actually exists for the North American market.

Therefore REAL would **encourage** the Town to pass this zoning specific use for the space requested at the old Hershey plant.

REAL is also offering the following suggestions for the town to consider in relation to the zoning being approved, coupled with a site plan, and or development agreement. Like everything in life every opportunity should be taken to improve a situation and these developers seem to be people who have the environment at the forefront of their business plan. In fact, their openness and consideration for all at the meeting is to be commended as far too many developers come to meetings with the concept that public is to be avoided and ignored. These developers have certainly demonstrated that they are not of that opinion and hence these suggestions will and can be easier to implement by such conscientious persons.

- a) Approve the site specific zoning to a specific amount i.e. 10 tonnes a day. While the developer was initially asking for less, it only makes sense for the Town to assist in realizing the best efficiencies for these gentlemen. . Create a holding zone which would be lifted once requested by the developer and the conditions can be demonstrated to be met. These conditions could include adequate trailer storage capacity, stack emissions testing which are found to be within the normal guidelines for systems that were anticipated, etc.
- b) Require the developers to meet with local residents and the town at specific timelines to discuss what is working well and what could work better.
- c) Require that any bonds and insurances needed issue a certificate to the town as a holder and that the town be notified should the bonds and or insurance become invalid or terminated.
- d) Facilitate the proponents holding an open or public meeting before Christmas,.The Council setting is not a very effective way to communicate, educate and find answers to unanticipated questions. By holding an open meeting at the arena or elsewhere in which the town, the proponent or other interested third parties like REAL can share what they have discovered and what they envision the project becoming. This waytrust can be built amongst all.
- e) That the town recommit to finding faster solutions to controlling truck traffic in the residential areas around the park. Some solutions include signs,

possibly hindrance devices and increased police education and enforcement to keep commercial trucks out of this area. Keeping heavy trucks out of this area will increase infrastructure life spans and create a more enjoyable neighborhood.

REAL looks forward to whatever decision is made by Council and stands ready to assist as requested or desired. To the Developer Summit Energy and those who have concerns, we at REAL stand ready as a neutral third party to assist in finding answers to your questions or concerns.

Respectfully yours,

Shawn Merriman
President
Rideau Environment Action League
25 years strong

Acknowledgements

Please note the following people and or organizations were asked for advice and feedback regarding this endeavor.

Town of Smiths Falls
The former Ontario Green Party Leader Frank De Jong
The Green Party of the Yukon
The Town of Whitehorse, YK
The Ministry of the Environment and Climate Change, Ontario
The TSSA
The proponents Summit Energy and the Saumure Group
Numerous persons both with concerns and support for this endeavor
And numerous websites and other persons who have knowledge regarding this process and system.