

Chief Gerald B. Toney
c/o Victoria MacDonald, Band Manager
29 Toney Blvd.
Cambridge, NS
B0P 1G0

October 15, 2024

Dear Chief Toney,

I am writing to you about a proposed expansion of a sand and gravel operation formerly owned and operated by Ivan H. Trimper Excavation and Track Press Service Limited. This pit is situated on South Mountain east of the Nictaux River in Annapolis County and had been operated since the 1990s under an Industrial Approval issued by Nova Scotia Environment and Climate Change. In 2012, an environmental assessment was commissioned by the previous operator to expand the pit to 41 hectares. Approval was subsequently granted by the Nova Scotia Minister of Environment through that process. Recently, the property ownership has changed and the pit will now be operated by Shaw Resources, a member of The Shaw Group Limited. Baseline studies have begun in support of a new environmental assessment for a proposed expansion of this operation by approximately 92 hectares.

Project Description:

The project will be located within the defined project area shown on the Site Plan (Figure 1). The project will consist of a sand and gravel pit and aggregate processing facility involving washing, screening, and crushing. Most of the raw sand and gravel at this site is within a geomorphological hill feature known as an esker and some of the sand extraction will be below the water table. The extraction process will first involve removal of the topsoil which will be saved for future use in reclamation. The raw sand and gravel will be washed and processed on site. Finished sand products will be shipped via truck from the site directly to destinations mainly within Nova Scotia. The finished products will consist of concrete sand, agricultural sand products, septic sand, washed stone, and crushed stone. The lifetime of the project is expected to be well beyond 30 years and depending on market conditions the expected annual production of sand products is projected to be 400,000 metric tonnes. The sand processing operation will have many similarities to our Keddy Aggregates operation in Coldbrook, Kings County.

Environmental Assessment:

Shaw has hired GHD Limited, an engineering and environmental services consulting company with an office in Bedford, to perform the environmental assessment studies and reporting. An environmental assessment is a formal and prescriptive process and the Minister of Environment and Climate Change will make a ruling following a period of public consultation. The purpose of

this process is to understand how a project might impact the people and the natural environment to determine how best to minimize those impacts.

On-going studies and studies conducted to date include:

- Surface water quality and quantity monitoring (on-going)
- Groundwater quality and quantity monitoring (on-going)
- Avifauna survey (Spring, Summer, and Fall 2023)
- Wetland evaluation (Summer 2023)
- Watercourse/fish and fish habitat evaluation (Summer 2023)
- Vascular plant surveys (Summer 2023)
- Lichen and habitat survey (Spring 2023)
- Early and late botany surveys (Summer and Fall 2023)
- Wildlife surveys (Spring/Summer/Fall 2023, in conjunction with other surveys)
- Wood turtle survey (Summer 2023)
- Species at risk surveys (Spring/Summer/Fall 2023, Summer 2024)
- Archaeological Resource Impact Assessment (ARIA) (2023)

Current Status and Key Findings:

- Strum Consulting (Strum) completed terrestrial (habitat, flora, fauna, and avifauna) and aquatic (wetlands, fish, and fish habitat) biophysical surveys for the project in 2023 and 2024. No priority species fauna or rare lichens were observed during the field surveys. Four avifauna species at risk were observed: common nighthawk, evening grosbeak, olive-sided flycatcher, and eastern wood-pewee. Four avifauna species of conservation interest were observed: bay-breasted warbler, pine warbler, pine siskin, and red crossbill. Biophysical surveys and effects assessments are ongoing and will be described in full in the Environmental Assessment Registration Document submitted for the Project.
- An Archaeological Resource Impact Assessment (ARIA) was completed for the proposed expansion area by Cultural Resource Management Group Limited (CRM) in 2023. Research, engagement, archaeological reconnaissance, and strategic shovel testing completed for this study yielded no evidence of historical land use within the study area. CRM contacted Kwilmu'kw Maw-klusuaqn's Archaeological Research Division (KMK-ARD) to request any available information pertaining to traditional or historical Mi'kmaw use of the study area. The ridgetop of the esker near the south edge of the study area was identified as an area of moderate archaeological potential. A program of archaeological shovel testing will be undertaken at ten-meter intervals prior to ground impacts in this area.
- A preliminary water balance analysis completed for the project determined predicted changes to streamflow in adjacent watercourses resulting from project development to be below the 10% alteration threshold as defined in the *Department of Fisheries and Oceans Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada*. An updated water balance incorporating the results of surface water and groundwater monitoring data is currently in progress and will be submitted with the environmental assessment registration document.
- Long-term groundwater and surface water monitoring plans are in development.
- GHD does not anticipate that any alterations to wetlands or watercourses will be required for this project. However, if an alteration cannot be avoided, it will be minimized as much as practicable.

- A traffic impact assessment will be conducted this fall to determine the impact of the proposed development to the surrounding transportation system.
- Mitigation and contingency planning have begun which will address topics such as erosion and sedimentation controls, progressive and final reclamation plans, spill response, dust control, on-site noise, and on-site traffic management.

We are appreciative of you reviewing the information provided here and look forward to any opportunities to meet and discuss the project with you. As well, we would be happy to answer any questions or address any concerns you may have. Please contact the undersigned in writing by November 5, 2024.

Respectfully,

A handwritten signature in black ink, appearing to read "S. Warren", with a stylized, flowing script.

Stephen Warren
Land and Quality Manager
Shaw Resources

By mail: Shaw Resources, P.O. Box 60, Shubenacadie, NS, B0N 1Y0
By email: swarren@shawresources.ca

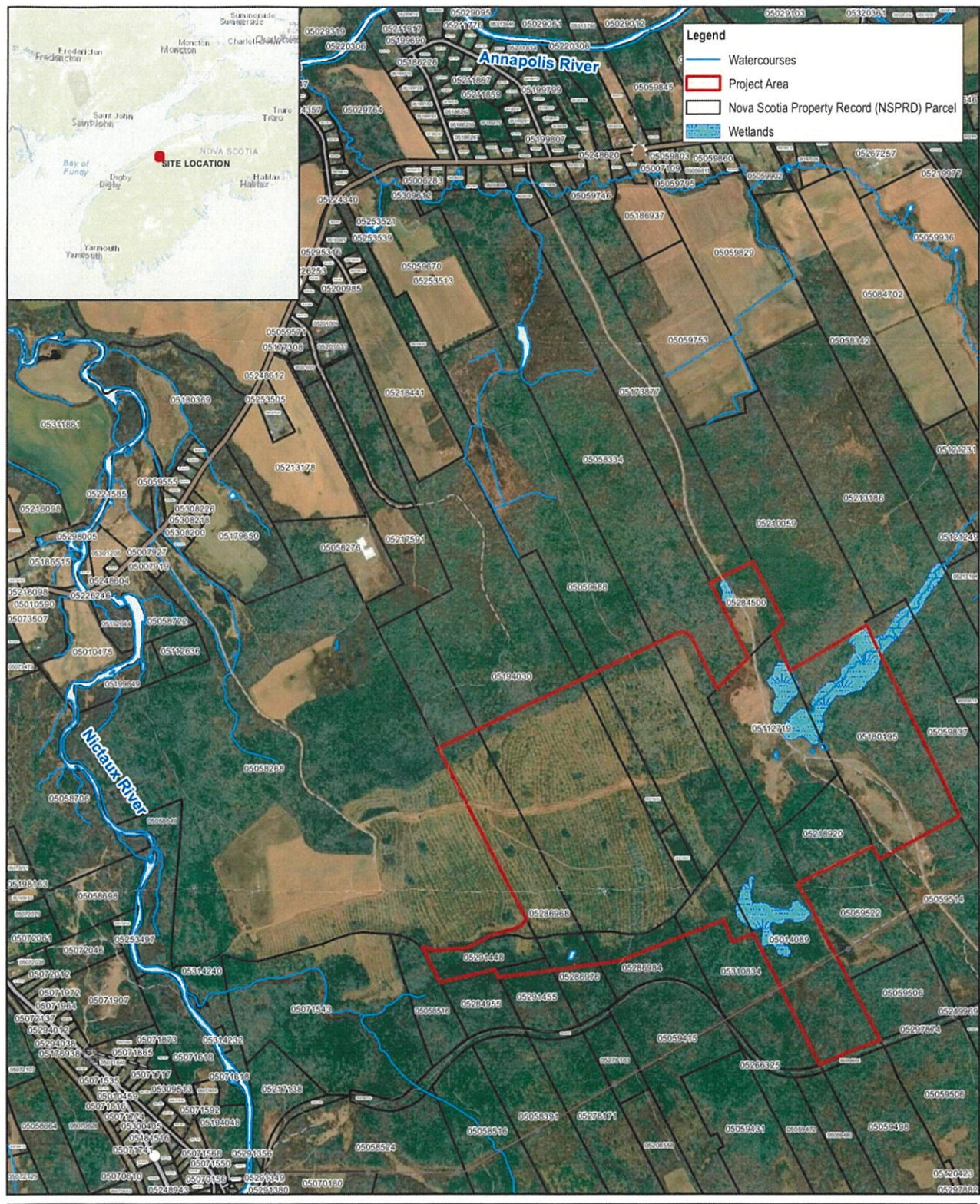
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K.M.K.N.O.
OCT 23 2024



Scale 1:20,000
0 200 400 600
Metres

Map Projection: Transverse Mercator
Horizontal Datum: North American 1983 CSRS
Grid: NAD 1983 CSRS UTM Zone 20N



THE SHAW GROUP LIMITED
SOUTH FARMINGTON, ANNAPOLIS CO, NOVA SCOTIA
PROPOSED SAND PIT

Project No. 12586970
Revision No. -
Date Oct 10, 2024

SITE PLAN

FIGURE 1