

November 20, 2024

Council of the Town of Heron Bay
111 Hall Street
Dalhousie, NB E3B 1X2

Re: Concerns regarding the proposed amendments to the Municipal Plan and the Zoning By-Law, Dalhousie Area, NB.

Dear Council Members,

On behalf of the undersigned, we write to express our significant concerns regarding the proposed amendments to the Municipal Plan and Zoning By-Law in Heron Bay, as well as the proposed pozzolan mine development. As stewards of the environment and advocates for sustainable community development, we urge the Council to reconsider and strengthen these amendments to protect the long-term well-being, health, and prosperity of Heron Bay's residents.

The current amendments appear to prioritize short-term economic gains from resource extraction without adequately addressing the long-term environmental, health, and socio-economic costs borne by the community. The history of industrial operations in New Brunswick shows a pattern where communities are left to manage the adverse impacts—deteriorated environmental quality, reduced property values, and, often, substantial cleanup costs, as evidenced by the costly reclamation efforts required at sites like the Caribou mine in Bathurst (\$49 million as reported by CBC, January 11, 2023).

Our Concerns with the Proposed Pozzolan Mine and Zoning Amendments

The proposed pozzolan mine is one of a series of industrial projects that have made grand promises of economic prosperity, only to leave residents with a legacy of environmental and health issues. Mining, and especially quarry operations, have well-documented impacts, including dust emissions, groundwater contamination, noise pollution, and loss of biodiversity. These negative impacts often devalue neighboring properties and disrupt local ecosystems, with implications for both human and environmental health.

In addition, a robust monitoring and compliance framework is essential for any such project, yet these are typically underfunded or inconsistently applied, leaving communities vulnerable to both chronic and acute environmental hazards. It is crucial that the amendments explicitly state and prioritize strong safeguards, including environmental impact monitoring and financial guarantees for site reclamation.

Request for a Stronger, Community-Centered Approach

We believe that the current amendments to the Municipal Plan and Zoning By-Law will not protect the citizens of the Town of Heron Bay and the surrounding area from the negative effects of industrial projects like the proposed pozzolan mine.

We think that any amendments to the Municipal Plan and Zoning By-Law should include provisions that:

- Emphasize both the potential benefits and risks of industrial projects, taking into account not only job creation but also the potential environmental and social costs of such operations.
- Transition from a "policy to permit" any kind of development in resource zones to a "policy to consider permitting" approach, enabling meaningful public consultation and ensuring community buy-in.
- Ensure that reclamation and remediation plans are comprehensive and enforceable, with clear criteria for assessing the effectiveness of these plans to prevent abandonment of contaminated or disrupted land.
- Furthermore, the community must have a voice in these decisions, especially regarding projects that pose significant environmental risks. The community's input should be solicited on critical issues such as land use, environmental protections, and industrial safety measures before any permitting decisions are finalized.

Our Request to the Council

Given the gravity of these issues, we respectfully ask the Heron Bay Town Council to halt the current amendment process. Instead, we urge you to pursue stronger, clearer bylaws that:

- Prioritize environmental and community health and safety,
- Ensure public consultation and community consent for resource development projects,
- Protect vulnerable natural features and sensitive areas from exploitation.

In closing, we believe that careful, community-informed decision-making can protect the Dalhousie area's environment, health, and economic future. We urge the Council to adopt amendments that reflect these values and provide lasting benefits for your community. Thank you for your attention to these concerns, and we hope to work together toward a sustainable future for Town of Heron Bay and surrounding area.

Sincerely,

Beverly Gingras, Executive Director, Conservation Council of New Brunswick

Jolène Dubé, President, Club des naturalistes du Restigouche Naturalists Club

The Heron Bay Conservation Group

Melanie Langille, President and CEO, NB Lung

Roberta Clowater, Executive Director, Canadian Parks and Wilderness Society - NB Chapter

Vanessa Roy-McDougall, Executive Director, Nature NB