

I have done a partial review of the Halton Water and Waste Water Master Plan Review (I will refer to as the Review) dated October 2002 and have the following comments. Based on the comments below, it is appropriate and necessary to extend the period for public comment to allow for a complete exchange between the region and concerned residents. It was clear from the public meeting held on 29 Jan 03 that many of the comments from concerned residents were not addressed. In addition, at the same meeting, Commissioner Murphy committed to establishing a web site on which public comments, and region responses would be posted for review and further comment.

1. In the Introduction of the Executive Summary of the Review, Section 1.1, the purpose of the Review was stated that:

“The purpose of the Master Plan Review was to complete a comprehensive, environmentally sound planning process, with public participation, to develop... a sound strategy.”

The purpose as stated has not been achieved on the following counts:

- 2.1 Public participation has been limited by the fact that much of the public input to date has not been dealt with by the Region. In addition, the public has been largely unaware of the Region’s plans to expand the Mid Halton Waste Water Treatment Plant by a factor of 5 to 8, or to 250 to 400K m³/day from the current capacity of 50K m³/day.
 - 2.2 The Review does not deal adequately with the environmental issues. There is no detail on current pollution levels, nor impact to air, land and water pollution as required by the Environmental Assessment Act. Please refer to the attached extract from the Review, Section 2, describing the Class Environmental Process and the requirements of the Environmental Assessment Act. Specifically, gas odours were not dealt with in the Review.
2. In the Problem Statement of the Executive Summary of the Review, Section 2.3, objective 2 was stated as follows

“To protect the environment, through wise use of resources.”

This key objective of the report is not met due to the lack of information specifically required the Environmental Assessment Act, as described in item 2.2 above.

3. In Section 2 of the Review, 2.1.1, Principals of Environmental Planning, Item 2, requires consideration of a reasonable range of alternatives:

“Alternatives include *functionally* different solutions, ‘alternatives to’ the proposed undertaking and ‘alternative methods’ of implementing the preferred solution. The do nothing alternative must also be considered.”

The Review considered only various ways of implementing the same solution. Alternative solutions such as point of generation solutions were not considered. The preferred water and waste water solutions, based on the Urban Area Buildout scenario, is estimated to cost \$.629 billion. Although not stated, it is assumed that these are year 2002 dollars. The future dollar value will be significantly higher. A very large portion of the bill is incurred in costly piping to move either ‘purified’ water to consumers, or sewage back to the lake. A point of generation system would treat waste where it occurs, and not contribute to further pollution of our lake and exacerbate the algae problem. This should be of prime concern to residents of the lakeshore area. A point of generation approach would also allow for better planning with respect to the location of point of generation treatment plants. It is inappropriate that the public is forced to deal with issues of industrial operations adjacent to residential areas.

In addition, the do nothing alternative was not considered. The do nothing alternative is paramount to the growth issue and deserves careful consideration. It must not be overlooked.

4. In the Methodologies section of the Executive Summary of the Review, Section 3., methodology 5 is stated as:

“Evaluation of the servicing alternatives against a set of criteria representing social, economic and environmental factors.”

Although a fairly thorough treatment of economic factors was present, the social and environmental factors were treated in a cursory way. See item 2.2 above.

5. The Review did not deal with potential accidents and their effect on the environments as well as the health and safety of the nearby population.

Another concern deals indirectly with the Review. At the information session hosted by Mr. Elgar and Mr. Flynn on 29 Jan 03, it was stated that the cost of water treatment infrastructure expansion, would be borne by current residents of the region. If so, this means that current residents are penalised for growth. Does this apply to all infra structure costs in the region? Growth must be funded appropriately by the growth areas.

Finally I would like to thank Mr. Elgar and Mr. Flynn, and those who presented during the information session on 29 Jan 03, for bringing this important issue to the attention of constituents.