

# OAKVILLEGREEN CONSERVATION ASSOCIATION INC.

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7 February, 2003

Mr. Ohashi  
Manager, Special Projects  
Region of Halton  
1151 Bronte Road  
Oakville, ON  
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Dear Mr. Ohashi:

## COMMENT ON THE PROPOSED HALTON WASTEWATER MASTER PLAN

Oakvillegreen Conservation Association Inc. attended the Public Information meeting hosted by Councilors Elgar and Flynn last Wednesday night, and wishes to express their grave concerns with the proposed path forward. In our respectful opinion the following specific concerns must be addressed and satisfied before staff makes its final recommendations.

1. **Are residents fully aware of, and agreeable to, the Region's plan to fund this growth-related infrastructure (\$600 MM plus) through substantially increased property taxes over the next 5 years, rather than through Development Charges?**

We respectfully suggest that the large majority of Halton residents are totally unaware of the funding plans for this growth-related infrastructure, and the future tax burden that Council proposes. We also suggest that most residents are still unaware of the plan to expand the facility at all!

**Suggested solution:** We recommend that the Region conduct a mail plebiscite to determine whether residents are indeed aware of, and in agreement with, the Region's aggressive growth plans, and whether they are prepared to finance these growth plans through property taxes before staff makes its final recommendations.

2. **What impact will the proposed expanded plant have on local real estate values and quality of life for the neighbouring communities?**

At the Elgar public meeting in November, and the Elgar/Flynn meeting on Jan. 29, it was patently obvious that the Region was not in a position to answer the above questions with any degree of certainty or scientific conviction. Just as the developers are always seeking "certainty" in the on-going support of growth infrastructure, so do we believe that existing

residents deserve “certainty” in their real estate investment, and in the continuity of their quality of life, which basically means what life will be like living near a very large sewage treatment plant AND deriving our drinking water from the lake in which this expanded facility will be dumping its treated waste water. Residents are being asked to absorb the majority of the risks associated with this venture, and we have no degree of certainty that this venture is the best alternative available. Residents are also not certain that ALL the available alternatives are currently on the table!

**Suggested solution:** The Region needs to do considerably more research into the experience of equivalently sized sewage operations running equivalent processes in order to provide the resident public with models of what environmental conditions might prevail when the proposed facility is operating at full capacity. The Region should also gather, through consultation with knowledgeable representatives of local realtors, information on the trends of local real estate values in those same study examples BEFORE staff makes its final recommendations. Staff must satisfy the public that ALL available alternatives (such as Zenon technology) are indeed on the table.

- 3. At capacity under the proposed operating conditions, this project will dump hugely increased loads of phosphorous into the in-shore lake waters. Will the Region violate Provincial Policy Statement 1.1.1 (f) if it proceeds with the project before we clearly understand and control the interrelationship between phosphorous and algae propagation?**

The current scientific hypothesis on the propagation and deposition of huge beds of decaying and foul-smelling algae along Halton’s foreshore during the months of July and August suggests that phosphorous is the key nutrient in stimulating this growth. The current sewage plant proposal admits no deviation from current practices for altering the level of phosphorous in the waste liquors being returned to the in-shore lake waters. Based on past experience of the Federal Ministry of the Environment, this should result in greatly increased growth of algae.

**Suggested solution:** Regional Council should declare an immediate moratorium on future regional growth until the scientific community understands the phenomenon of algae and can demonstrate effective measures to control it; the Province must be asked to hold the Region harmless to ensuing developers’ OMB appeals, under P.P.S. 1.1.1 (f) before staff makes its final recommendations.

- 4. Should we proceed with this project before we clearly understand how we will get rid of the resulting biosolids, realizing that spreading is probably no longer an option in the long-term?**

We suggest that the test for selecting the optimum disposal for biosolids should first consider environmental consequences and secondly cost considerations. We understand that most European countries (and EEAC) favour incineration. We also understand that Ashbridge’s Bay experience with incineration was negative in terms of unacceptable and

harmful exhaust emissions. We further understand that the opportunity (and acceptance) of field-spreading of biosolids is being rapidly exhausted.

**Suggested solution:** Regional Council must insist that further, comprehensive studies of this crucial question be undertaken, and that the findings, based on peer-reviewed, scientific facts, be provided to the community BEFORE staff makes its final recommendations.

5. **Why was a “do nothing” option never included as part of the Environmental Assessment (EA), as required by MOE?**

We understand that the E.A. carried out in support of this project did not include the required “do nothing” alternative, on the grounds that HUSP had pre-determined that growth must proceed regardless.

**Suggested solution:** We respectfully suggest that the “growth pre-determination” is specious and not acceptable within the terms of the Act. Therefore, if the “do nothing” alternative was indeed overlooked, we insist that Regional Council require that the E.A. be re-opened and that the “do nothing” alternative be addressed, along with its attendant public information processes BEFORE staff makes its final recommendations.

6. **Why was “ODOUR” not included as part of the criteria in the Environmental Assessment (EA), as required by MOE?**

We understand that the E.A. carried out in support of this project did not include the “odour” criteria.

**Suggested solution:** We respectfully suggest that “odour” is a relevant criterion and must be researched and explored. Therefore, if the “odour” issue was indeed overlooked, we insist that Regional Council require that the E.A. be re-opened and that the “odour” issue be addressed, along with its attendant public information processes BEFORE staff makes its final recommendations.

**Considering the proximity to residential and recreation areas, an odour free facility should be a condition.**

We have seen many presentations, giving confusing data, based on very limited studies, indicating that certain percentages of people might detect a smell depending on where they are and in which direction their noses are pointed. This is unacceptable.

**Suggested solution:** As the technology is readily available a condition must be that this facility is completely odour free and that that costs be included in the budget.

**7. Why are Oakville residents being asked to bear the majority of risks associated with this massive expansion?**

Karrey Shinn, Chair of the Toronto Safe Sewage Committee, and panellist at the Jan. 29th meeting, raised many concerns about the proposed expansion plan for the Mid Halton Plant. They included the real possibilities of inadequate buffering, increased levels of toxic emissions, inadequate period for public comment, newest and cleanest technology not currently the preferred option and more, and the necessity for building one mega plant.

**Suggested solution:** We respectfully suggest an extension to the period for public comment beyond the current deadline of February 7 and that no recommendation come before council until the issues mentioned above have been addressed to the satisfaction of the residents of Oakville.

**8. Whereas the Great Lakes are Canada's number one natural resource and the deleterious effects of population growth on the quality and quantity of the water are still unknown, any type of pollution, be it phosphorous or other, must be avoided.**

With lake Erie again at serious risk, we must take serious measures to protect Lake Ontario from any type of pollution. The technology to produce a "clean" discharge is currently available and the company (Zenon Environmental Inc.), who is located in the Region, has this "State of the Art" Technology readily available.

**Suggested solution:** The possibility of producing a discharge which meets the criteria to be used as intake for the water supply and the potential of connecting the two should be investigated. A discharge free of any pollutants should be a condition for approval.

**9. Whereas the supply of clean water will be one of the most critical issues facing mankind in the next 50 years, the preservation of that supply should be a top priority.**

The data published so far do not include the negative impacts on the water supply, caused by the proposed expansion. The collective affect of adding millions of people to the Greater Toronto Area, who will mostly depend on Lake Ontario for their water supply must be determined and exposed.

**Suggested solution:** Regional Council must insist that the negative affects of taking more water out of Lake Ontario by this expansion as well as other projected expansions in the GTA, be investigated and the data published.

**10. The Mid Halton Treatment Plant is scheduled to take all the sewage from Milton and other areas where growth will occur.**

It is risky and inefficient to transport this sewage over long distance.

**Suggested solution:** Two alternative solutions must be included:

1. To install a treatment facility in Milton with a design which will allow the discharge to be used as intake for the water supply in Milton. This will eliminate the huge cost and disruption of piping to Oakville (preferred)
2. To install a waste treatment facility in Milton, pipe the discharge to the Mid-Halton facility and connect it to the discharge of that facility.  
The volume and risk would be significantly reduced.

On Jan. 29, residents learned that their questions and concerns raised since the previous public meeting in November, would be compiled and addressed in a document that would not be released until some after the period for public comment had passed, perhaps in March. We find this unacceptable and again request that the period of public comment be extended so that any responses to the Region's answers could be included within the time frame for public comment.

Questions have arisen as to whether the Region is SERIOUSLY considering the cleanest and safest technology for the long term health of the community, which includes Lake Ontario, source of our drinking water. Our organization recently met with the founder of Zenon Environmental, and we request that the Region of Halton re-examine this technology, currently being used world wide, and that the public be fully informed of this process and its outcome.

We believe that a Citizens' Committee should be established to allow for further research and ensure citizen participation in the decision process.

We thank you for this opportunity to comment, and urge you to act on our suggestions. It is not "good planning" that short-term profits for local developers result in long-term pain for the community.

Yours very truly,

Michael Lansdown,  
OAKVILLEGREEN CONSERVATION ASSOCIATION INC.

CC: Councillors Elgar and Flynn  
Mr. Brian Emo, OLRA