

June 27th, 2005

Stan Holiday  
Senior Planner – Legislative Approvals  
City of Hamilton  
71 Main Street West  
7<sup>th</sup> Floor  
HAMILTON, Ontario  
L8P 4Y5



Re: Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89

Dear Stan,

Please find attached the initial written submission regarding hydrogeology from Friends of Rural Communities and the Environment (FORCE) to both the Peer Review and Combined Aggregate Review Team (CART) processes for the proposed Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89.

Water is fundamental to life. We, along with other animal and plant species, cannot survive without it. Personally, we use it to drink, to cook, for personal hygiene, for laundry, for recreation, and for landscaping, among other uses. Its use is integral for area agricultural operations, such as for livestock, irrigation, and other farm-related uses. Some of our public facilities, such as schools and child care centres, have explicit requirements for potable water supplies in order to maintain operation. Both water's quantity and quality carry significant importance.

FORCE has predicated virtually all of its submissions to governments regarding this application and related policy matters on the principles of environment-first and certainty. These principles hold especially true for water quality and quantity. By environment-first, we speak to the need for decision-makers to exercise a precautionary approach where the risks are great and/or inestimable and are challenging to mitigate – such as in fractured media aquifers where the nature and behaviour are very different and much harder to assess than unconsolidated porous aquifers. By certainty, we speak to surety for all stakeholders – in this case, certainty that area municipalities, residents, farms, and other businesses will have a sustainable groundwater water supply upon which they can count for quality and quantity into the future.

The Walter and Duncan Gordon Foundation, a leader in water policy analysis in Canada, in its most recent report on groundwater policy permitting and pricing in Canada (2005), refers to groundwater as valuable “buried treasure” that needs to be protected and managed for sustainability. As such, this submission includes three components:

1. FORCE's interpretation of the regulatory environment against which we believe the application and its potential impact on our “buried treasure” should be reviewed in order to achieve those protection and sustainability goals as well as to uphold our principles of environment-first and certainty
2. Analysis by INTERA Engineering Ltd which speaks directly to FORCE's concerns about the specific methodology used and conclusions drawn in the proponent's Planning Report and Preliminary Hydro-geological Assessment (and appendices) and
3. A non-exhaustive listing of omissions/gaps/inconsistencies in the proponent's Planning Report and companion technical reports which relate to water.

In conclusion, we believe that the Province of Ontario's, the City of Hamilton's and adjacent municipal jurisdictions' existing duty and pending obligations to protect source water, directly and through their agent, Conservation Halton, are clear.

FORCE appreciates the opportunity to participate afforded by the City of Hamilton. As noted above, this cover letter and the enclosures constitute our full initial submission to the application's hydro-geological analysis. This response will be supplemented, as necessary, during the course of the application review period and as the proponent amends its application. We have provided the material electronically in pdf form and I would ask that this material be provided to the City's Peer Review Team and CART members to be considered as an input to the application review process for the proposed Lowndes Holdings Corp. aggregate development application OPA-04-17 and ZAC-04-89.

Respectfully submitted,

A handwritten signature in black ink that reads "G. Flint". The signature is written in a cursive style with a long horizontal line underneath the name.

Graham Flint BSc, P. Eng  
Chair & Spokesperson

copy via Email to: [sholiday@hamilton.ca](mailto:sholiday@hamilton.ca)