

November 14th, 2005



**Friends of Rural Communities
and the Environment**

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

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

Dear Stan,

Please find attached our written submission regarding hydrogeology from Friends of Rural Communities and the Environment (FORCE). The November 11th, 2005 INTERA Engineering Ltd. (INTERA) report addresses the draft three-volume *Hydrogeology Level 2 Report* for the proposed Carlisle quarry, prepared in June 2005 by Gartner Lee Limited (GLL) and provided to Kenneth G. Raven, M.Sc., P.Eng., Principal and Senior Hydrogeologist of INTERA under a July 28, 2005 cover letter from Gunther Funk of GLL. We provide this submission for 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.

As noted in our original submission, 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. The GLL Hydrogeology Level 2 Report, itself, concludes that the development of the proposed Carlisle quarry would have an *unacceptable impact* on local water supply wells and the Flamborough and Mountsberg Creek Wetlands. Capture zones and Well Head Protection Areas for the Carlisle municipal wells will change with unknown impacts for water quality, quantity, and water treatment requirements. Analysis by INTERA speaks directly to ongoing issues and concerns about the specific methodology used and conclusions drawn in the Proponent's draft Report, documenting that the future drawdown and resulting implications may be even greater. Based on GLL's conclusion noted above, the single most important hydrogeological issue in this review, however, is the engineering feasibility of implementing the groundwater recirculation system (GRS) mitigation measure as described in the Hydrogeology Level 2 Report. The GRS has only been conceptually evaluated by GLL using a computer model, based on a very simple representation of the bedrock. It has not been demonstrated by the proponent that it can be practically implemented at this site. Given this reality along with the documented practical implementation concerns, the GRS should be considered an *unproven mitigation measure* for the site which does not meet the absolute commitment to protection and enhancement of the Water Resource System nor other Source Water Protection tests.

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FORCE appreciates the opportunity to participate afforded by the City of Hamilton. 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 BAsC, P. Eng
Chair & Spokesperson

copy via Email to: sholiday@hamilton.ca