

November 22nd, 2007

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



Re: St Marys Hydrogeology Work Plan (Final Draft August 2007) and related documents, as part of proposed aggregate development application OPA-04-17 and ZAC-04-89

Dear Stan,

Thank you for the opportunity for FORCE, on behalf of our communities, to provide input to the City of Hamilton and the Combined Aggregate Resource Team (CART), on the Final Draft Hydrogeology Work Plan and related documents.

As you well know, in our area, groundwater is the only source of potable water. The Carlisle municipal system, the Stonebrook Estates communal well, and thousands of individual wells for homes, schools, farms and businesses all use groundwater as the source for drinking water, sanitation and other uses. Our historical challenges are well known and documented. Given the volumes of water involved both to draw down groundwater levels in order to assess the GRS feasibility, at the proposed quarry site, and ultimately for dewatering the proposed quarry, we remain seriously concerned about the adverse groundwater quantity and quality impacts. We feel it is incumbent upon the City and MOE to exercise their duty to protect public health and to afford our groundwater the highest level of protection possible.

The latest Hydrogeology Work Plan, and related information contained therein, confirms our ongoing concerns. As such, we re-enclose a copy of our November 29, 2006 framework presentation to the MOE upon initial consideration of the PTTW application.

More specifically, we have enclosed a report, dated November 19, 2007, from INTERA Engineering Ltd re: Review of Hydrogeological Work Plan, St Marys proposed Flamborough Quarry Site, as prepared by Kenneth G. Raven P.Eng, P.Geo, Principal and Senior Hydrogeologist. Raven documents his opinion on the great difficulty and potential hazards of undertaking both the pilot scale GRS and of implementing such a system to full quarry scale. Should there be a determination to proceed at some level, Raven makes specific recommendations regarding updating the groundwater flow model, identifying at risk wells, determining numerical trigger values and corresponding response actions, assessing dye tracers, and involving stakeholders in field test monitoring. We have also re-enclosed INTERA's report of November 26, 2006 as the hydrogeology and related issues expressed there remain for both the proposed GRS pilot and full scale implementation of the GRS at the proposed site.

We have provided this material electronically in pdf form and ask that it be provided to the CART members to be considered as an input as part of the application review process for the proposed St Marys Cement CBM 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 flourish underneath the name.

Graham Flint BAsC, P. Eng
Chair & Spokesperson

copy via Email to: sholiday@hamilton.ca

cc: Minister McMeekin, MPP
Margaret McCarthy, Councillor