



Mr. Ian Kerr, Supervisor
Water Resources, Southwest Region
733 Exeter Road
London, Ontario
N6E 1L3

February 26, 2008

RE: PTTW FROM SITE 41, TINY TOWNSHIP, COUNTY OF SIMCOE

Dear Mr. Kerr,

The Federation of Tiny Township Shoreline Associations is an integrating body for 26 ratepayers associations in the shoreline residential areas of Tiny Township, Simcoe County. Our membership comprises approximately 1,700 households and 4,200 persons.

We urgently request that you not approve the application of the County of Simcoe for a Permit to Take Water at its proposed Site 41 waste facility.

We have the following grounds for making this request:

1. The discharge of the water that the County of Simcoe proposes to pump from the initial construction stage of the waste facility will enter bodies of water that contain viable and valuable fish habitat. **The discharge will alter that habitat.** Under the federal *Fisheries Act*, approval of such discharges is permissible only subsequent to the presentation and approval of an **Environmental Study Report** that has been conducted by appropriately qualified professionals, and has been subject to public comment and review. Such a Report has not been done; or, if it has been done, it has neither been made public nor has it had appropriate public review. Furthermore, since the Permit to Take Water that you now have before you for your consideration is acknowledged to cover only the first of several stages of construction and/or operation of the proposed waste facility, it is required that an assessment of the **cumulative environmental impact** of such an undertaking be performed, evaluated and made public, **prior** to the commencement of any part of the undertaking.
2. The Conclusions and Recommendations of the Technical Support Document rely heavily – if not totally – on groundwater modeling using the USGS MODFLOW computer program. The Community Monitoring Committee and many individuals have requested that the County of Simcoe release the model and its data to them for peer review. The County has refused to do so.

Therefore, the process of public review of the Application for the Permit to Take Water has been **subverted** and has not been fulfilled; therefore, the Application should **not** be approved.

3. At a public meeting of the Community Monitoring Committee on February 14th, 2008, concerns were raised that conditions could arise where the **upward hydraulic gradient** required for the waste facility to meet the Certificate of Approval for its continued operation may, under some foreseeable conditions, become **negative**. Neither Mr. Jagger, the hydrogeology consultant, nor Mr. Brodzikowski, the facility's designer, could provide assurances that such conditions could not arise. Therefore, the Application should **not** be approved.

For all of the above reasons, we urge you not to approve the Application for a Permit to Take Water, since any one of the reasons should be sufficient for you to take such a decision. We are sure that you are well aware of the onerous burden placed on you should you take the wrong decision in this case.

Respectfully submitted,

A handwritten signature in black ink that reads "Judith Grant". The signature is written in a cursive, flowing style.

Judith Grant
President, Federation of Tiny Township Shoreline Associations

cc: Mr. Jim Richardson, Regional Director, Southwest Region ON, MoE
The Hon. Mr. John Gerretsen, MPP, Minister of the Environment
The Hon. Mr. Loyola Hearn, MP, Minister of Fisheries and Oceans
Mr. Dan Thompson, Habitat Management, DFO