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Comments on WWF report (EA Stage 2C) "Selection of Preferred Site" Jan. '85

1. Almost inconceivable that the various aspects are given equal weighting.

Hydrogeology covers two aspects at least:

- 1) Suitability for landfill in situ.
- 2) External effects.

In the first Aldershot is unsuitable on this scale, it is too small, the slope is too great, the land needs remedial surface treatment now.

- 2) The external effects cannot be controlled by engineering with any guarantee of safety.

Only a fool would rate the Aldershot site #1 on hydrogeology. Did the consultants read or hear the meeting last May??

Site F ranks 5 (after B & C) Flat shale land OK - sloping, never!

2. Traffic Already the traffic to King Rd. seriously affects safety on N. Service Rd. morning rush hour traffic and we must contend with garbage trucks and crews visiting Plains Rd. eateries, especially at the maximum time for school crossings in the area - with hygiene & safety are greatly at risk!

Site F ranks 4th after A.

2. Especially in view of complexities of new road intersections (403/QEW).

3. Natural Environment It is very strange to see that the water quality would improve if we had a dump. The kind of reasoning one would find in Alice in Wonderland/blunder/land.

4. Agriculture The 'one' ranking comes from long neglect by owners, the site would be fine for horticulture if reclaimed!! (It was in the past also see letter in B. 2nd wk)
(It was in the past; also see letter)

5. Population impacts Omits musicians and historians!!
Emotional impact should extend to area bounding Plains-Waterdown-Guelph Line. Very different score.

F would then be 6, the others would not change.

Similarly chart 3, p. 20 grossly underestimates visibility (Harbord Square for example) and dust, noise and odour impact on S.W. Tyandaga and area N. of Plains Rd. given dominance of strong northerly & westerly winds.

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Land Use Compatibility Absurd analysis -

Site F - Bruce Trail is 1.5 km away.

Bayview Park is lost.

The "benefits" of reclamation of the present dump are lost - think of the money saved in not providing ^{hypothetical} picnic tables!!

Cultural environment Site F not looked at, though disturbed ground can be rich in artefacts - presumably there will be no shortage of archaeology for future generations! Seriously, the 'sites' described are quite trivial, the material found could be found in any farmers field in S. central Ontario! Similarly the heritage features are commonplace, in A-E they would survive in the 100 m zone or be removed to the Agric. Museum. There is double listing (editorial error)

for A and most of the listed features are outside the site plan. In D Gothic stucco is not worth serious consideration, one "Palladian" house is ^{one too} many. It is absurd to give two factor rankings on Cultural (sic) ^{features, of equal weight to the physical environment} ~~Environment~~ - do the dead outrank the present population impacts 2 to 1??!! Why "preserve" features of minimal cultural interest in remote areas if no one attends? ^(via Wentworth Museum & its financial problems)

8 Costs The ranking obviously makes Site F a poor choice with haul costs much undervalued. Clearly to bring half the load to the western periphery from within all of Burlington and the other half from beyond Burlington to the same site makes no sense. One needs a nodal site, somewhere NE of Burlington, approximately on Hiway 25, north of the QEW, ^{on the boundary of Oakville, Milton & Burlington (See my suggestion on rail transport of waste)} ~~on the boundary of Oakville, Milton & Burlington~~ ^{regarding} RANKING needs revision:—

1.1 F is not 1 (one) but 5.

1.2 F is not equal 1 but 4.

2.1 Agree 6.

3.1 Ranks 6 (extend south and southeast). Arbitrary distance. ^{denotes little or no real study or definition of criteria.}

3.2 Ranks 4.

3.3 Ranks 6. (in view of prevailing W & N winds)

3.4 6 High noise impact " " " " " "

3.5 Not 4 but 5.

3.6 Faulty reasoning. Ranks 4.

4.1-4.2 Trivial - ignore.

5.1 Ranks 5.

The consultants seem to have a very weak grasp of statistics and ranking procedures, e.g.

The rather dubious summary of Public Health and Safety under noise of operations:-

Site F with '0' (zero) households affected	rank #1
8 households merits	rank #2
9 households merits	rank #5 (!)
14 households merits	rank #6

However the 'noise' consultant puts parallel regular zones around the areas without attention to dominant wind speed, direction; angle and slope direction of land. Quite clearly in F the S.W. Tyandaga and Plains Rd. area gain more noise from operation and traffic. Several hundred households would be affected.

(Note also the maximum degree of use is in the southern part).

The consultant can't even number his summary pages correctly. Why are the table pages unnumbered? Not in sequence?

Another statistical oddity is the treatment of dust levels:

low	17 x 10 ²	
relatively low	18 x 10 ²	
relatively high	24 x 10 ²	(D)
High?	30	B?

There is no statistical significance between 17 or 18 - the margin of error / questionnaire nullifies the numerical difference of 1 unit measurement of 1.

Chart 6 p. 1. A flow pattern in an area of steep gradients is more marked but less predictable and certainly less controllable, the statement about potential adverse impacts is absurd and quite unacceptable.

Chart 6 p. 2. There is high use of local roads - Plains Rd., King Rd. and Guelph Line, N. Service Rd. Why should we be moved by Milton's alleged plight - if Georgetown's trucks must pass through it!!!! (cd). E!! Traffic services). These trucks will be passing through N.W. Burlington & E. Aldershot all the time!!
Where will the mini-airplanes of Chart 8F, and the trailbikes and snowmobiles be relocated - the Frances Rd. hydro line?

Dust/noise/odour. Site F: tho' there are no homes/residences within 250 m of the site (unless of course it has no 100 m buffer) there are several hundred within 400 m.

Chart 8 Hiway noise - Hiway 403 and the Bridge (not a tunnel) are noisy enough already, especially the police sirens playing games ^{on 403} on Sunday morning. CN rail line is only noisy at night. As Burlington has long since grown beyond QEW/CN/CP lines it is high time that noise reduction be applied, either by tree planting or noise berm erection and cutting down night-time train speed and frequency.

Chart 8 L.U. Compatibility Industry will not be attracted to such an area (East of King).
land use N. 1/2 N. 2/2

p. 22 Site F is too small, too sloping and very complex drainage, uncontrollable at the S.E. corner. As the leachate loss is admitted, the threat is not to the environment, but to people directly, heading to Harvard Square and the Frances Rd. hydroline, a direct line of seepage. (See map 10, 2? much like re. thinking)

A-4 Gateway to Oakville? Why only Oakville? the scenic beauty is also by King Rd. and the Bruce Trail from Waterdown to Keens, and visible to all on the 403 on the new intersection.

The Report ^{raises four} ~~omits three~~ ^{misses} important questions:

1. The size of the tile company's excavation - presumably less than the total area?

When was the M. of E. licence given? - was it given in ignorance of the plan to use it for garbage disposal? - what form of collusion was existing? Need the shale be dug out? If it is dug out there are better ways of reclaiming quarries for recreation and sport, or gardens etc. rather than garbage infill and dumping.

(Socially acceptable waste disposal with the already populated suburban area)

2. The report lists as a factor favouring the use of the land for waste disposal, the presence of unused land W. of Kings, N. of the railway and south of the QEW. This is quite untenable. This land could be developed for industry, very profitably, if they have the owners kept off the market - is it unsellable because materials are buried there? This is prime industrial land, right by a rail siding and easy access to QEW/403. Why is it undeveloped these 20-30 years? What is hidden under its disturbed surface so as to make it unusable? The same serious if not deadly chemical wastes that are in Bayview Park, put there by who knows what chemical company in the years before there was even the present rudimentary and inadequate environmental safeguards? ^{were applied}
3. The Report totally ignores all questions and answers and proceedings of the May 1984 hearing in the Polish Hall and fails to report many if not all the comments given at meetings with Ms. Schyff in Aldershot.

4. The reports as a whole are very ^{tenuous} ~~tenuous~~ and ^{ad hoc} ~~ad hoc~~, with much inference and guesswork and a very poor grasp of statistically sound or even logically acceptable methods of ranking and ^{comparison} ~~comparison~~. The sections on hydrogeology, ^{social impact} ~~social impact~~ and noise are very unthorough. The question then, is this report worth the money? More seriously, it is a grossly inadequate study and its conclusions are based on such faulty reasoning and procedures that it, quite literally, should be laughed out of court.