



coalition on the niagara escarpment

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March 26, 1985

Mr. R. Mohammad
Director of Planning and Development
Regional Municipality of Halton
1151 Bronte Road
Oakville, Ontario
L6J 6E1

Re: Proposed Halton Regional Landfill Site

Dear Mr. Mohammad:

The Coalition on the Niagara Escarpment (CONE) has recently examined a document entitled: Environmental Assessment Landfill Component of Solid Waste Management, Draft Summary Report. We wish to offer a few brief comments on the Burlington site it recommends for the consideration of your Council.

Over the past decade, CONE has represented the concern of major national and provincial conservation organizations as well as thousands of people across the province who share a deep commitment to the long-term protection of the Niagara Escarpment, one of the country's most outstanding natural features. In our view, the development of the proposed major landfill facility at site "F" in Burlington would significantly detract from this goal.

As presently located, site "F" lies on one of the more prominent escarpment slopes in this area, where a development of the scale proposed would be visible to an enormous number of people all the way from the harbour to the top of the scarp itself. With an area of more than 200 acres and a projected final elevation of 15 meters above grade, the landfill would dramatically alter the surrounding landscape -- a landscape which is so important to the character of the region.

We are dismayed that this fact was so narrowly interpreted by your consultants, who ignored the enormous cultural significance of the escarpment as a heritage feature in the analysis of the six optional sites. Clearly, if the consultants are capable of estimating the emotional impact of the proposed facility on residents adjacent to the various sites, they should also have factored into the analysis at this far more obvious detraction from the experience of thousands of hikers, boaters and other Ontarians for whom the escarpment landscape is a vital element of their identity and heritage as residents of this province.

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Mr. R. Mohammad
Proposed Halton Region Landfill Site

While the proposed site does not lie within the present Niagara Escarpment planning area, it is part of the Parkway Belt corridor which was justifiably proposed for addition to the escarpment planning area by the Niagara Escarpment Commission in its final proposed plan. At a minimum, the corridor should be treated as a bumper zone for the escarpment in this area and development controlled accordingly.

There are other reasons for seriously questioning the choice of site "F" as well, the unsuitable hydrogeological conditions being by far the most important. We cannot accept that the overriding need to guarantee public safety will be adequately met by the proposed engineering solution to the leaching problem in the fractured shale which underlies the site. In our view, the consultants' very subjective analysis of the six optional sites fails to justify their selection of the one with the poorest rating for public health and safety -- the only one which uses engineering as the first line of defense rather than as a back up to a natural containment system. Surely an alternative site with more favourable conditions, and requiring less costly construction, can be secured. In our view, the search should not stop until then.

Despite the volume of data generated by the consultants in rationalizing their recommended site, it appears that the overriding analysis was that the area around site "F" is already polluted by former and existing landfill activity and that a little more pollution won't hurt. CONE does not agree with this approach and we urge Halton Regional Council to reject site "F" and to give due consideration to the board environmental and cultural values of the Niagara Escarpment in subsequent site selection analysis.

Thank you for considering our views.

Sincerely,

Grace Patterson
Vice President

cc: Lyn McMillan
Hans Kreplin

