

Canadian Environmental Law Association
L'Association canadienne du droit de l'environnement

243 Queen Street W., 4th Floor, Toronto, Ontario M5V 1Z4, telephone (416) 977-2410

DELIVERED

November 17, 1987

Ms. Nada Davidovic
Environmental Assessment Board
1 St. Clair Avenue West
6th Floor
Toronto, Ontario
M4V 1K6

Dear Ms. Davidovic:

**Re: Halton Landfill Hearing
Intervenor Funding**

Pursuant to the funding panel's order of February 23, 1987, we are hereby applying for funds allocated to our clients for experts' expenses in regard to the Halton landfill hearing.

We have attached a statement of accounts submitted to date by our expert witnesses for work performed which have been paid by our clients, the West Burlington Citizens Group (WBCG).

As you will note, \$21,526.25 has been paid to Mr. Paul Bowen, hydrogeologist; Mr. Reg Lang, social impact expert; and Mr. Steven Varga, biophysical expert. Of that total \$7,462 was reimbursed through the City of Burlington's grant to the WBCG. The remainder of the City's \$12,000 grant was used towards other hearing - related expenses. The remaining \$14,064.25 has been paid by our clients through monies collected through other fundraising efforts. They have therefore clearly met the terms of paragraph 1 (iii) as set out in the funding order. Mr. Reg Lang is also carrying out a social impact assessment study which is being funded separately by the City of Burlington.

It had been our understanding that once our clients had expended \$10,000 they would then be eligible to receive the \$15,000 which we would place in our trust account and disburse as required. However, from my discussion with you on November 16, 1987, it appears that you are considering disbursing the funds as invoices are forwarded to you. If that is indeed the case, and in order not to delay the receipt of the badly needed funds, it would seem that, at this point in time, the WBCG is eligible to receive \$11,526.25.

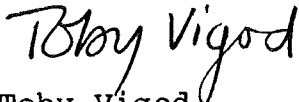
As you are probably aware, the hearing has already gone 60 days and is anticipated to continue until May or June of 1988. This has become an onerous burden on our clients who are doing their best to raise additional funds through garage sales, etc. Funds will be required to pay for our three experts' preparation of their witness statements and attendance at the hearing to give evidence and be cross-examined. In the case of our hydrogeologist, the funds will also be used to enable him to attend the hearing and listen to the evidence of a number of hydrogeologists who are still to testify, and to assist us in cross-examination. We therefore hope that you can expedite the release of the funds.

Finally, in accordance with paragraph 1 (vii) we hereby undertake to seek costs at the end of the hearing and to apply any amount received on behalf of the WBCG, towards repayment to the crown of the \$15,000 advanced.

If you have any further questions, please contact us.

Yours very truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Toby Vigod
Counsel

TV:sf

STATEMENT OF EXPERT WITNESSES ACCOUNTS - HALTON LANDFILL

Consultant	Explanation	Date	Amount Disbursed	Grand Total
Paul Bowen, Terraprobe	Invoice 3395	10/31/85	520.00 *	
	Invoice 3421	11/30/85	837.00 *	
	Invoice 3462	12/31/85	637.75 *	
	Invoice 4186	12/31/86	572.00 *	
	Invoice 4345	01/31/87	1,667.25 *	
	Invoice 4408	02/28/87	762.00 *	
	Invoice 4536	04/30/87	870.00 *	
	Invoice 4688	05/31/87	1,740.00	
	Invoice 1002	06/30/87	3,724.50	
	Invoice 1034	07/31/87	3,946.75	
	Invoice 1077	08/28/87	<u>783.00</u>	
				\$16,062.25
Reg Lang & Associates	<u>Statement</u>			
	Oct. to March	03/09/87	1,846.00 *	
	May	06/01/87	1,800.00	
	June	07/01/87	<u>1,200.00</u>	
				\$ 4,846.00
Steven Varga		02/24/87	<u>620.00</u> *	
				<u>\$ 620.00</u>
				<u>\$21,526.25</u>

NOTES ---* Designates amounts reimbursed through City of Burlington's Grant to the WBCG. Total reimbursement for expert witnesses was \$7,462.00. The remainder of the City's \$12,000 grant was used towards other hearing related expenses.

The invoices not marked by a * have been paid by the West Burlington Citizens Group out of the monies raised by the group. The total paid is \$14,064.25.