

January 7, 2005

THE RESPONSE OF THE RURAL MUNICIPALITY OF SPRINGFIELD TO THE EIS SUPPLEMENT IN THE PROPOSED FLOODWAY EXPANSION PROJECT;

The focus of our response lies in sections 2 and 13, and in particular those brief extracts pertinent to groundwater. Once again groundwater does not receive the attention it deserves. There is no mention of the R.M. of Springfield municipal wells at the corner of Heatherdale and Hazelridge Roads. While these wells are some distance from the Floodway channel, they draw water from the Birds Hill Oakbank sand and gravel aquifer and, depending on the nature of pathogen entering the aquifer, they are not immune from the potential of contamination.

As usual the information provided by the Authority is disappointing, and on the face of readily available documents, most investigations are apparently incomplete, tentative, and subject to field inspection which will take place after the environment license is issued. The Authority even admits their analysis is incomplete in some areas. The bottom line seems to be just give us the license and trust us.

In that setting it would be helpful if it were at least explained why the investigations listed were being undertaken, the extent to which such investigations have in fact been performed, what the results are or might be, and what the appropriate mitigative response might be in the face of possible results.

The Supplement serves only to further muddy the waters as to proposed deepening, in particular at the C.P.R. Main Line and Highway 59 Bridges, sites where significant groundwater out flows already occur.

It is somewhat encouraging that a clay plug is being proposed in the east bank of the Floodway rather than simply being a possible consideration. However no specifications accompany the available EIS documents. The location and extent are both uncertain and there is no indication of what groundwater impact would occur absent the clay plug. Apparently the design of the plug would incorporate the existing clay plug extending under Spring Hill Ski Slope. Knowledge of this plug would appear to indicate some knowledge of the original construction but again no drawings or specifications are offered. No observations are offered as to the effectiveness of the existing plug either to prevent ground water outflows or flood water intrusion. Will the proposed clay plug be more effective, less effective or designed only to provide no negative impact and perhaps, more importantly, no benefit over the Authority's self imposed base line of post existing floodway?

All of these issues have become of much greater concern given the discovery of a significant and constant flow of untreated sewage from the drop structure in the west bank, east of Kildare Avenue. Observations of January 5, 2005 noted there was open water, a full channel much larger than the pilot channel of the Floodway, with clouds of steam all at an ambient temperature of -29°C. The only waters in the Floodway pilot

channel at this time are groundwater and raw sewage – a frightening combination in our view.

Obviously the Floodway expansion will further expose water-bearing gravel and till soils to a dangerous mix of pathogens and chemicals. In our view mitigation would require:

- 1) a plug or other form of contaminant barrier recognized as effective
- 2) a contaminant inventory
- 3) ongoing monitoring in a transparent and public manner

There is nothing in the EIS to indicate an awareness of these pathogens and chemicals as being present in the Floodway waters at other than flood stage. The best possible interpretation is that the Floodway engineers are blissfully ignorant of the true state of affairs.

The usual theme of lack of concern for pre-existing conditions and the position that such concerns are not part of the Authority's mandate are repeated.

On October 14<sup>th</sup> the Commission indicated that they were prepared to receive evidence concerning the appropriate scope of the mandate and at this point it is far from settled as to what the mandate will be within the context of cumulative effects under federal legislation. No existing impact should be ignored to the extent that mitigation may be required at the end of the day. We have no reason today to believe that the Authority is anything beyond unconcerned and ignorant and hope that they have not seen fit to withhold such information.

We appreciate our review of this supplemental information is very limited as we are being buried in paperwork. More documents are being added within obscure piles of engineering documents and we cannot afford to hire a number of people full time to combat the multi million-dollar team assembled by the Authority. It is miraculous that our meager resources have made us aware of major present and future health threats not brought to light by the Authority with all its' resources.

In conclusion, we trust the evidence of unreported contamination within the Floodway will draw due attention and concern that will result in a proper assessment to ensure the future health of our water supplies.

Respectfully Submitted  
R.M. of Springfield

Per Reeve John D. Holland