

GREAT LAKES UNITED

An international coalition to conserve and protect the
Great Lakes/St. Lawrence River ecosystem

December 8, 1996

Members of Regional Council
Regional Municipality of York
17250 Yonge Street
Newmarket L3Y 6Z1

RE: Long Term Water Supply Project

Dear Members of Regional Council:

Great Lakes United is a coalition of citizens', environmental, conservation, sports, labour and educational organizations from Canada, the U.S. and the First Nations. Over our fifteen-year history, we have been involved in issues affecting water quality and water quantity. A major part of our work has been on water diversion issues in various parts of the Great Lakes. We are now in the finishing stages of a major report on water quantity in the Great Lakes. This report is based on over one year of research.

We are alarmed at your *Summary Report on Alternatives*. We do not find any of the alternatives presented to be satisfactory for four major reasons:

1) None of the alternatives look at the option of living within the Region's natural resources: In all cases, the Region assumes that the area's population can grow endlessly without taking into account the availability of water. Instead a critical determining factor in deciding whether to allow growth should be the assessment of what water is available within the region. This means leaving our pipe dreams in the past and properly managing and living within the water resources locally available to us.

2) None of the alternatives adequately emphasizes water conservation: The report makes references to "demand management" and "leakage control" and this is included in all options. Your studies estimate an approximately 20% reduction in water demand through these measures. Experience elsewhere shows that serious retrofit programmes alone can achieve a 30% reduction in

ST-LAURENT, GRANDS LACS UNIS


Une coalition internationale vouée à la protection et la conservation de l'écosystème des Grands Lacs et du fleuve St-Laurent

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water demand. When leakage control and other conservation measures are added, demand for water can be reduced even more. In most countries in Europe, water consumption per capita is between 40% and 65% less than ours.

3) None of the alternatives places enough emphasis on use of ground water: The report writes off ground water as a possible source of water for the urban parts of the Region. Instead, all alternatives place their main emphasis on the building of pipelines to import water into the Region. Adequate research has not been conducted to reach the conclusion that ground water cannot supply significant quantities of water to the Region.

4) The alternatives do not take into account the degradation of water quality as a result of excess consumption of water: Most water that is used is eventually discarded in a polluted form. In this case, it would go through sewage treatment plants into Lake Ontario. Inevitably this results in the degradation of water quality, even after going through the best sewage treatment plants.

We also are alarmed that the proponents in this case do not take seriously the impacts that these alternatives would have on the ecosystem far beyond York Region. The construction of pipelines that extend well beyond the region would have negative environmental effects at the place from which the water is withdrawn and all along the pipeline. In addition, if the Georgian Bay option were to be chosen, it would have impacts all the way from Georgian Bay through Lake Huron, the St. Clair River, Lake St. Clair, the Detroit River, Lake Erie and the Niagara River. Unfortunately, this report does not assess these impacts. As a result, York Regional Council members are not in a position to be able to seriously take this into account when weighing the alternatives.

All the alternatives in this report are based on massive importation of water from beyond the Region. These alternatives, therefore, are not simple, normal water supply projects that municipalities often undertake. This is a major undertaking that is not similar to the normal run-of-the-mill municipal water supply project. Therefore, we do not think that it is acceptable for the Region to proceed through the Class Environmental Assessment process.

The Class Environmental Assessment for Municipal Water and Waste water Projects says that a Class Environmental Assessment is meant to be used when the project has the following characteristics: "recurring", "usually similar in nature", "usually limited in scale", "a predictable range of environmental effects", and "responsive to mitigating measures." This project has none of these characteristics. Therefore, we urge the Regional Council to immediately change this process from a Class EA to an individual EA. To proceed further at this point could result in investing substantially more money in a false start and having to go back to a much more preliminary stage later when the



Minister decides to "bump-up" the Class EA. It would make much more sense from economic and time perspectives for the Regional Council to now change this to an individual EA process.

We appreciate the opportunity to comment on this document and look forward to future opportunities to make input into the development of your water strategy.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Jackson".

John Jackson
President

cc: Norm Sterling, Ontario Minister of Environment and Energy