

I would like to point out that in my opinion, the City Operations Campus – Business Case and Staging Plan is flawed due to not accounting for the restrictions and requirements of the Ministry of the Environment Certificates of Approval associated with the City owned land on the corner of Watson and Sone Roads.. The CofA requirements have been put in place for the entire site and the Business Case has not dealt with how the City Operations Campus would be able to function and maintain compliance. It is my recommendation that Council not give staff their approval to proceed with the planning and design of the future facilities consistent with the City Operations Campus Business Case and Staging Plan until such time that it can be demonstrated that the Operations Campus could comply with the Cof A's and that the additional costs of compliance be incorporated into the Business Case.

Ken Spira

President

SPIRA Fire Protection Ltd.

The following is a brief list of my concerns as requested by Elizabeth.

I do have numerous concerns; however I have also not had the chance to go through the CofA's in any detail so will just give you a brief list of my concerns at this point.

1- The CofA's list that the City of Guelph applied to establish and operate a Waste Disposal Site (Transfer and Processing) consisting of a 29.54 hectare of property for the purposes of composting, multi-material recovery, and waste transfer to serve the municipalities and businesses of the Province of Ontario and Municipal Hazardous and Special Waste Transfer Station serving the County of Wellington and City of Guelph, to be used for the following and I don't see the proposed use as a Hub listed anywhere:

a) the use and operation of an Organic Waste Processing Facility composting of the following categories of waste (Note: Use of the site for additional categories of wastes requires a new application and amendments to the Provisional Certificate of Approval); organic non-hazardous waste from residential, industrial, commercial and institutional sources limited to a maximum Site indoor storage capacity of 8,500 tonnes;

b) the use and operation of a Material Recovery Facility for processing, transfer and temporary storage of the following categories of waste (Note: Use of the Site for additional categories of wastes requires a new application and amendments to the Provisional Certificate of Approval); municipal waste including food and beverage cans, cardboard, glass, newspaper, plastic, waste electrical and electronic equipment and other such materials as would be collected by means of the source separated dry waste collection system limited to a maximum indoor storage capacity of 3850 tonnes and having an outdoor storage area for recyclable waste and leaf and yard waste that is located to the west of the Organic Waste Processing Facility;

c) the use and operation of a Municipal Hazardous and Special Waste facility for the transfer and temporary storage of the following categories of waste (Note: Use of the Site for additional categories of wastes requires a new application and amendments to the Provisional Certificate of Approval); Municipal Hazardous and Special Waste limited to the following waste classes; 112, 121, 145, 146, 148, 212, 213, 221, 242, 251, 252, 261, 263, 269, 312, and 331 as outlined in the New Ontario Waste Classes January 1986 limited to a maximum Site storage capacity of 15 tonnes; and

d) the use and operation of a Waste Disposal Site (Transfer) for non-hazardous solid industrial waste (Note: Use of the Site for additional categories of wastes requires a new application and amendments to the Provisional Certificate of Approval); from industrial, commercial and institutional sources, commercial waste and domestic waste, with an indoor storage maximum capacity of 795 tonnes and outdoor storage areas for leaf and yard waste and for recyclable waste.

2- The protection of the groundwater has always been a concern as the site is over a very large triple layer aquifer with no aquitard to protect it. With the proximity to Arkell Springs, the Eramosa River and the nearby residents that get their water from private wells in Guelph/Eramosa, Puslinch and the City of Guelph, protecting our water must be our #1 priority and I'm concerned that this type of development would do the opposite. As indicated in the years of annual reports, the site has a very large amount of salt that is contributed to vehicles and roadways and in my opinion, this will be much worse with the proposed change of use. Even though there is some protection inside the existing buildings from a spill getting into the water below the site, there is no protection due to fire fighting water escaping the buildings and migrating into the ground water. This water was once directed into the sanitary, however some is now directed to storm water and with previous fires at the facility, I believe this has accounted for the annual reports discounting test results as unknown sources and am worried that additional development of this type will increase the possibility of ground water contamination such as the proposed fuel supply.

3- The allowable hours of operation currently in the CofA's were negotiated in good faith with the adjacent neighbourhood that were there prior to the land being developed as a waste facility and I am concerned that any change of use at the site would not be able to comply with these hours resulting in a change being pushed through by the City with disregard to the neighbourhood.

4- Noise would be an issue as there are many homes to the south, south east and with a possible increase in residential development to the west on the provincial lands, this facility would not be compatible.

5- During many years (six I think) that it took to develop the Guelph Innovation District Secondary Plan, many residences close to the site including myself were very involved in the processes. There were many meetings with City staff that resulted in the existing soil piles being accepted as a buffer along the south property line that have since had some trees put in place to enhance the buffer that should remain as promised. A mixed use designation on the land just north of the buffer with road access through openings in the soil piles was also planned for and I personally have been waiting for lots to become available so that I could purchase one to build a new building to expand my business. This along with the park planned to the south west section of the site that is to include an extension of the hiking trails and now that the Provincial distances from the existing ANSI could be maintained since the demolition of the SUBOR plant, could all be in jeopardy or minimised due to the site not having enough room for the proposed use and this obviously is a huge concern. I would hope that agreements put in place during the development of the Guelph Innovation District Secondary Plan would not be revoked with disregard to the years of negotiations between the residential neighbourhoods located in Guelph, Puslinch and Guelph/Eramosa Townships and the City of Guelph as this would destroy the intent of the process.

- 6- In conclusion and with all due respect, I'm afraid that those of us that spent countless hours that ended up being many years of time spent by us and City staff to put in place the requirements for the waste facility site along with the final Guelph Innovation District Secondary Plan will be disregarded and thrown to the curb and that for so many reasons, would just be wrong.

Ken Spira

President

***SPIRA* Fire Protection Ltd.**