ERO # 026-0124

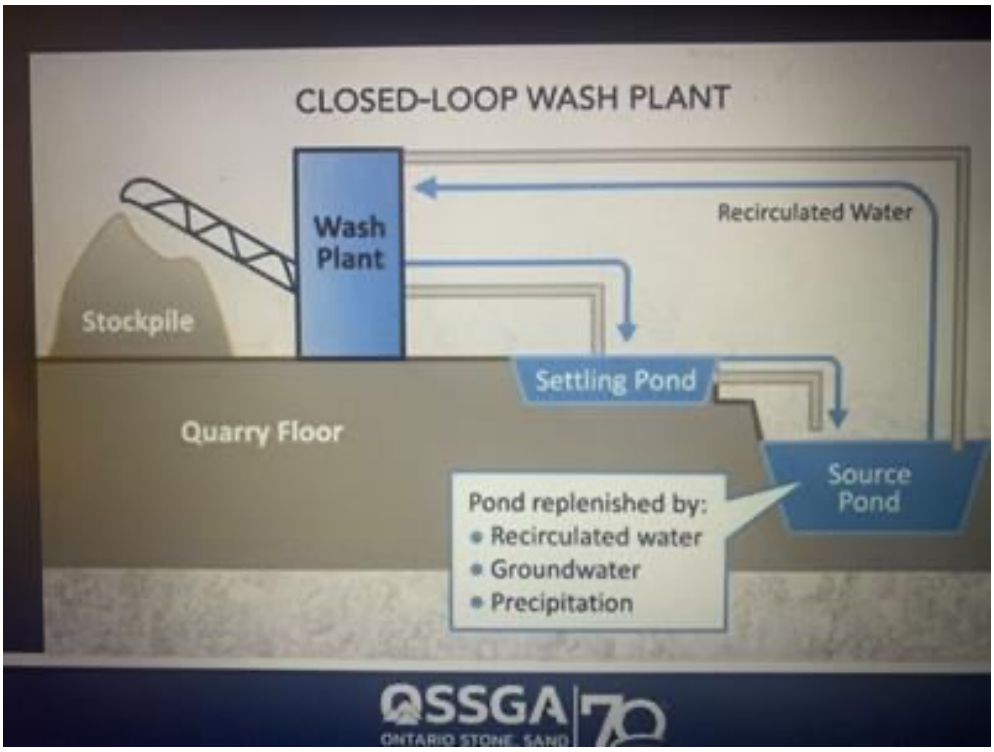
My sincere thanks for the opportunity to comment on this application.

The Ministry has identified this proposal as a Category 3 permit where “water takings are anticipated to have the highest potential of causing **unacceptable environmental impact or interference.”**

Esbaugh Sand and Gravel Limited is requesting to remove up to 9.72 million litres per day, a maximum of 230 days over a 10-year period. That will be result in 22,356,000,000 litres of water pumped through the washing station.

The planed project is reported to be a “closed loop system” that returns most of the water to where it was first removed. 9.72 million litres per day is a lot or water. Is the source pond an artificial fully enclosed construct or is it part of a watershed?

The following diagram produced by the Ontario Stone, Sand & Gravel Association supposedly illustrates the closed loop system. Is it accurate or misleading?



It appears as if the “Source Pond” is encased in some dark grey material resembling cement. Is the water source enclosed in an artificial pond or is it part of the environment, a pond, lake, or river where groundwater, precipitation and “recirculated water” move in and out of the “source pond” and into the ground and eventually to an aquifer. Or, the water could also flow through a

watershed. So, unless the “source pond” is water tight, the recirculated water is really returning to a dynamic interacting system that is not closed at all.

The water used in the washing process will dissolve inorganic and organic salts and other molecules, heavy metals, potential toxins, parasites and viruses from a static location and move these elements and compounds into a new environment; a water system that is intricately linked, and where everything the water carries will travel and mix.

Is there a monitoring system in this open loop to ensure the wash water returning to the environment is safe and doesn’t contain any dangerous compounds or organisms?

Is the location of this project above a Recharge Zone where water moves through the ground into the aquifers that supply drinking water not a significant risk to water quality?

Is this an appropriate time to approve a project that will impact water quality when there already are significant water quantity concerns? This is a project “anticipated to have the highest potential of causing unacceptable environmental impact or interference.”

The Waterloo region is dealing with a water-supply crisis and development freeze. Approval of this project will further reduce the water supply and negatively impact water quality. It is not wise to add fuel to the fire. There is no positive impact for the residents of the Waterloo Region but there is great risk.