

October 17, 2008

The Honourable John Gerretsen  
Minister of the Environment  
12th Floor, 135 St. Clair Avenue West  
Toronto, Ontario  
M4V 1P5

Dear Sir,

Re: Transportation of materials through vulnerable areas - threat to drinking water sources

At the August meeting of our Source Protection Committee, the Committee expressed concern that transportation corridors are not adequately considered in the risk assessment process. In our region, as in many other regions, major transportation corridors cross through Well Head Protection Areas and Intake Protection Zones. Transportation corridors such as major highways, railways, shipping lanes and pipelines need to be considered for the risk that they may pose to municipal drinking water sources. The committee is also concerned about potential threats caused by abandoned pipelines which are quite prevalent in parts of the region. I am sure you can appreciate that these corridors transport a multitude of materials in quantities large enough to pose significant threats if they were to be released within these vulnerable areas.

The Clean Water Act refers to activities and includes a definition of activity which includes "land use". The Act provides for Activities to be either prohibited or regulated. Further, a proposed regulation identifies activities which can be identified as threats. In comments on the EBR posting of this regulation and related rules, staff provided a comment that the transportation of materials should be added as an activity which could be considered a threat. We wish to bring this oversight to your attention and request that provisions be made for the Source Protection Committees to consider these threats and develop plans to reduce the threats where they are significant enough to warrant such plans.

Although the transportation of materials is regulated through various other legislation, none are specific to the transportation of those materials within a vulnerable area associated with a municipal drinking water source. By including this activity in local Source Protection Plans municipalities and other agencies can have a framework within which they may address the impact that these corridors could have on local drinking water sources in the event of a spill. We realize that some aspects of transportation and corridors fall under Federal and International jurisdiction. It is however important



that the committee be allowed to pursue local solutions to reducing the risks where it is possible to realize reduced risk. We understand that this is being considered in finalizing the Director's Rules, however the committee wished that I bring this to your attention at this time.

If you have any questions or concerns with this request please do not hesitate to contact me at (519) 461-1567 or Chris Tasker, Source Protection Project Manager at (519) 451-2800 x 238.

Yours sincerely  
Thames-Sydenham and Region

A handwritten signature in black ink, appearing to read "Rob Bedggood".

Robert Bedggood, Chair  
Source Protection Committee

cc Hon. Jim Bradley, Minister of Transportation  
Hon. Donna Cansfield, Minister of Natural Resources  
Hon. George Smitherman, Minister of Energy and Infrastructure  
Howard I. Wetston, Q.C., Chair & Chief Executive Officer, Ontario Energy Board  
Ian Smith, MOE  
SPC Chairs  
Thames-Sydenham and Region SPC members