



May 10th, 2024

To whom it may concern,

This letter is to express concern for the well-being and health of the local community and the potential adverse effects on the Sydenham watershed, should the proposal for the expansion and relocation of the small dormant landfill along with the development of a Regenerative Recycling Facility put forth to the Environmental Registry of Ontario by York1 be approved. We are basing our contest on the grounds of potential degradation of the natural environment, as per Sections 4.1 and 4.2 of the guideline: D-4 Land Use On or Near Landfills and Dumps from the Government of Ontario. Our goal is to be a voice for our local ecological community, advocating for the ongoing preservation and conservation of biodiversity within the Sydenham watershed and beyond.

This correspondence aims to highlight pertinent details and environmental concerns related to the proposed project's potential impact on the Sydenham River and watershed ecosystem.

### **Site of Proposed Dump Expansion**

The proposed expansion site, situated at 29831 Irish School Road, encompasses a historical 2-acre waste disposal area previously used by the Town of Dresden for ash disposal from the town's garbage incinerator in the late 70's. Under the current proposal, York1 intends to dispose of up to 7,000 tons of waste daily, operating 24/7, with an anticipated influx of up to 700 trucks per day.

Of significant concern is the proximity of the proposed site to springfed Molly's Creek, which flows directly into the Sydenham River and eventually into Lake St. Clair. The potential impact on the water quality of these biologically rich ecosystems is alarming and in direct violation of the D-4 Land Use guideline.

Moreover, we are deeply concerned about the potential introduction of invasive species into the area as a result of the accumulation of soils from other areas. The transportation and accumulation of soils from other regions increase the risk of introducing invasive species such as hammerhead worms and jumping worms, which will pose a significant threat to the biodiversity and health of the local environment surrounding and downstream of York1's proposed facilities. These invasive species risk disrupting the delicate balance of the ecosystem and harming native flora and fauna in these regions.



## **The Sydenham Watershed**

Please see the website link [www.sydenhamriver.on.ca](http://www.sydenhamriver.on.ca) from which the following facts have been produced.

The Sydenham watershed is the traditional territory of the Anishinaabeg, Haudenosaunee, Lunaapeewak, and Attawandaron peoples who have a connection to the Land and water of southwestern Ontario in Time Immemorial. The Sydenham watershed, spanning across multiple counties, is characterized by its low-relief terrain and nutrient-rich waters; prime habitat for over 40 Species-at-Risk (SAR). Its high species richness makes the Sydenham River the most biologically diverse watercourse at both provincial and federal levels.

The significance of waterways such as Molly's Creek, which directly connects to the East Sydenham River, cannot be understated. The pollution created as a direct result from landfill and “regenerative recycling” operations poses a grave threat to the delicate aquatic ecosystem, jeopardizing the diverse array of species dependent on these waters for survival.

The outlined proposal of York1's landfill and regenerative recycling facility raises concerns regarding water contamination, soil degradation, and the introduction of invasive species to an already threatened population of SAR. The proposed stormwater management plan in its current state would **not** mitigate leachate discharge into the Sydenham Watershed. Considering the delicate ecosystems it would affect, and in light of increasingly frequent extreme weather events, the wastewater management plan for York1's proposed facilities in Dresden requires serious review and ratification prior to implementation.

## **Species-at-Risk in the Sydenham**

The Sydenham River boasts an impressive array of aquatic life, housing a minimum of 34 species of mussels and 80 species of fish. Over 40 of these fish and mussel species are classified as SAR. The Sydenham River, particularly the area under discussion, plays a vital role as a spawning ground, not only for endangered species but also for seasonal spawners from the Great Lakes region, including those belonging to fisheries in the area.

Additionally, the watershed provides habitat for various semi-aquatic SAR, including amphibians, turtles, snakes, and dragonflies. Some of these species are exclusive to Canada or are only found in a few locations worldwide. The conservation of these species is of global concern, underscoring the importance of protecting the Sydenham watershed. For more information on the SAR inhabiting the Sydenham River, please visit: [www.sydenhamriver.on.ca](http://www.sydenhamriver.on.ca)



## **Conclusion**

In conclusion, our organization advocates against the proposed dump site expansion by York1 due to its potential adverse effects on the Sydenham watershed, a critical ecological lifeline. We urge careful consideration of the environmental implications outlined herein and implore decision-makers to prioritize the protection of our Canadian natural heritage.

Thank you for your attention to this matter, and we trust that you will take the necessary steps to address our concerns in the best interest of the health of our local community, natural heritage, and the environment.

On behalf of the Board of Directors and our membership,

***Bill Young***

*Conservation Chair of the Sydenham Field Naturalists*