



Date: November 14, 2014

Lakeridge Citizens for Clean Water
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Subject: Division 2 of Part 4 Bill c-43 Amendments to the Aeronautics Act

To the Standing Committee of Finance,

The Lakeridge Citizens for Clean Water (LCCW) the amendments to the Aeronautics Act as proposed in Division 2 of Part 4 of Bill C-43.

Our organization consists of approximately 205 members.

We have been involved with the Aerodrome/fill dump issue for the past 4.5 years. We have appealed to Transport Canada on many occasions regarding the growing trend of using airfields as soil dumps for what seems to be mostly waste soils from Greater Toronto Area's development and infrastructure projects.

In 2010, a beautifully rehabilitated gravel pit in the Township of Scugog in a sensitive area on the Oak Ridges Moraine changed hands. Soon afterwards, hundreds of trucks per day came in dumping fill over the property. When the Township of Scugog discovered contaminated fill on the site, the permit was revoked however, the owners kept dumping claiming "federal jurisdiction" having put up a windsock and landed a helicopter.

The Township had to take them to court at significant cost for a small township. The judge decided in favour of the Township indicating a fill permit must be obtained. Four years later, this land sits unvegetated, unstabilized and with significant amounts of soil contamination atop a highly vulnerable groundwater area where people draw from wells. No one is taking responsibility for it. More detailed information can be found on our website www.lakeridgecitizens.ca under the "Earthworx" tab.

There is also a growing trend of smaller **existing** aerodromes being bought up and then owners declaring the need for incredible amounts of soils (fill) to "renovate" the aerodromes/airfields.

Municipalities are being threatened with legal action if they try and regulate the fill coming into these sites. Some have put minimal requirements on the aerodrome dumping operations, considerably less than they would ask of anyone else.

Some municipalities have ignored any kind of enforcement on these sites for fear of legal action. Such is the case for the Greenbank Airfield in the Township of Scugog. The aerodrome was bought in 2011 and the owner quickly declared the need for approximately 2.5 million cubic metres of fill to “renovate” the airfield. The airfield owner then offered to buy out the farms adjacent to the airfield and some neighbours, fearing their property values would go down living near a soil dump, accepted the offer. Presently, the Greenbank Airfield is now declaring changes to their proposed renovation plans stating they need to fill on these neighbouring properties as well. With no limits on locating an aerodrome and no direction or limits from Transport Canada on what is and is not permitted with regards to construction and expansion, it is feared the filing related to this particular aerodrome project will go on indefinitely.

The Aeronautics loophole has resulted in a dangerous legacy of unregulated or poorly regulated large fill dump sites at several aerodromes around the GTA. With the growing number of other contentious large fill sites in southern Ontario, some with contaminated soils, we are concerned that unregulated or poorly regulated soil dumps at aerodromes has the potential to be quite devastating in terms of the protection of our water, soil resources and sensitive lands. Understanding this, in the Township of Scugog, as with several other municipalities, fill at aerodromes has been a major topic in the media and the recent municipal elections.

We support the proposed amendments and should the amendments pass, we would appeal to the Minister of Transport to enact comprehensive regulations that would stop the unregulated use of aerodromes as dumping grounds for fill and to respect provincial plans, which were developed for all citizens, when approving the location and expansions of new or existing aerodromes.



Sincerely,
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The Greenbank Airfield dumping operations—Photo from the Toronto Star Article, October 20th, 2014