

Ms. Christine Long,
Board Secretary,
Ontario Energy Board,
2300 Yonge Street, 27th Floor, Box 2315
Toronto ON M4P 1E4
<BoardSec@oeb.ca>

Re: Enbridge Gas Inc. – 2021 Dawn Parkway Expansion Project

We understand that Enbridge Gas Inc. has asked for a written hearing for this proposed project and is seeking to obtain a final approval from the Ontario Energy Board by April of 2020. Democracy Probe is deeply concerned about both these objectives.

We believe a thorough public review of the application definitely requires an oral hearing that is open to public viewing and attendance. And we believe the proposed timeline is inadequate and unrealistic.

There are multiple reasons for our views. The proposal comes at a time of increasing public and governmental awareness that the global community is facing a climate emergency. Declarations of a climate emergency have been made this year in Hamilton, Burlington, Oakville, Milton, Toronto and many other Ontario municipalities. The government of Canada has also recognized the climate emergency and quite recently so has the European Union.

Democracy Probe is a Hamilton-based group, most members either current or retired McMaster university professors. We represent a variety of disciplines. We have concentrated on public education, delivered through seminars and public forums, and for the past two years climate change has been our central focus. We have investigated the extent of the climate crisis and concur that it is an emergency situation that poses an existential threat to human civilization. At the heart of the causes of this emergency is the burning of gas, oil and coal. Indeed, the Intergovernmental Panel on Climate Change advised the global community more than a year ago that greenhouse gas emissions must be reduced by at least fifty percent by 2030 to minimize the likelihood of exceeding an average global surface temperature increase of 1.5 Celsius beyond which extreme consequences become highly likely including the danger of uncontrollable change. In our view, at a bare minimum this means we must immediately stop expanding fossil fuel infrastructure such as the pipeline that Enbridge is proposing to construct in this project.

Democracy Probe is also deeply concerned about the ecological impacts of this proposed project. It is to be located entirely within the protected Greenbelt. It will cross provincially and locally significant wetlands. It will cross Hamilton's largest stream (Spencer Creek) as well as Bronte Creek, and appears likely to negatively affect the headwaters of both in the Beverly Swamp. Substantial portions of the proposed pipeline route cross Natural Heritage Features designated by the City of Hamilton in its Rural Official Plan.

The number one goal of the City with respect to these features is "to protect and enhance biodiversity and ecological functions". This goal is obviously not achieved by constructing a pipeline that will impede these functions and that will bulldoze a 28-50 metre swath, most of it as a permanent easement.

We understand that Enbridge, through its application, is also seeking OEB approval of the company's proposed integrated resource planning protocol. Such a protocol would have significant implications not just for the current project but for future ones as well. This is another reason why a transparent and fully open oral hearing is essential on this pipeline proposal.

Gary R. Purdy FRSC

Distinguished University Professor Emeritus, McMaster University on behalf of Democracy Probe