



Raisin-South Nation Source Protection Region

Source Protection Committee Meeting Agenda

January 17, 2024

10:00 a.m.

Location: South Nation Conservation Administration Office
38 Victoria Street, Finch, Ontario

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1. Call to Order
 2. Chair's Remarks
 3. Approval of Agenda
 4. Declaration of Conflict of Interest
 5. Delegations / Presentations
 - a. Program Update - PowerPoint Presentation: Staff
 6. Approval of Minutes
 - a. Source Protection Committee Minutes of June 8, 2023 1-4
 7. New Business
 - a. Project Manager's Update: Lisa Van De Ligt 5
 - b. SPC Membership Update: Lisa Van De Ligt 6-7
 - c. Revised Draft Salt and Snow Policies: Claire Lemay 8-13
 - d. Municipal Working Group Update: Alison McDonald 15-16
 8. Community Engagement: Roundtable
 9. Correspondence
 - a. Comments from the Raisin-South Nation Source Protection Committee on ERO posting number 019-6813 - Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument. August 4, 2023. 17
 10. Date of Next SPC Meeting: March 27, 2024
 11. Adjournment



Raisin-South Nation Source Protection Committee

Draft Minutes

June 8, 2023 – 10:00 a.m.

**Location: South Nation Conservation Administration Office
38 Victoria Street, Finch, Ontario**

- PRESENT:** Raymond Beauregard, Chair
Theresa Bergeron, United Counties of Stormont, Dundas and Glengarry
Elaine Kennedy, Great River Network
Martin Lang, Raisin Region Source Protection Authority Liaison
Dominique Lefebvre, United Counties of Prescott and Russell
Lawrence Levere, United Counties of Leeds and Grenville
Glenn Mackey, Clean Water Committee
Chris McDonell, General Public
Idalia Milan, Eastern Ontario Health Unit Liaison (virtual)
Don Munro, General Public
Jacqueline Pemberton, Agriculture
Robert Rathbun, City of Cornwall
Tom Van Dusen, General Public
Blair Walker, Aggregates
Stephen Wilson, Commercial / Industrial
- REGRETS:** Michel Kearney, City of Ottawa
Mary Wooding, MECP Liaison
- ABSENT:** François St-Amour, South Nation Source Protection Authority Liaison
Walter Oeggerli, Agriculture
- STAFF:** Phil Barnes, Team Lead, RRCA
James Holland, Senior Planner, SNC
Claire Lemay, Senior Planner, SNC
Alison McDonald, Managing Director, SNC
John Mesman, Managing Director, SNC
Erin Thorne, Communications Specialist, SNC
Lisa Van De Ligt, Project Manager, RRCA



1. Call to Order

Raymond Beaugard, Chair, welcomed all in attendance and called the meeting to order at 10:02 AM.

2. Chairman's Remarks

Raymond Beaugard, Chair, welcomed all in attendance and provided a verbal update on recent happenings with the Drinking Water Source Protection program. Ray introduced the two new Source Protection Committee members (Glenn Mackey and Dominique Lefebvre).

Tom Van Dusen arrived at 10:05 AM.

3. Approval of Agenda

Resolution #18/23

Moved by: Don Munro
Seconded: Jacqueline Pemberton

CARRIED

4. Declaration of Conflict of Interest

None

5. Delegations / Presentations

a) Staff presented project and program updates

Resolution #19/23

Moved by: Elaine Kennedy
Seconded by: Jacqueline Pemberton

That the Source Protection Committee send a letter to the Province in response to Bill 97.

6. Approval of Minutes

Resolution #20/23

Moved by: Theresa Bergeron
Seconded: Elaine Kennedy

That the minutes of the April 11, 2023 meeting of the Raisin-South Nation Source Protection Committee be approved.

CARRIED



7. New Business

a) Project Manager's Update

Resolution #21/23

Moved by: Glenn Mackey
Seconded: Stephen Wilson

That the Raisin-South Nation Source Protection Committee receive and file the Project Manager's Update.

CARRIED

b) Source Protection Committee: Appointment Update

Resolution #22/23

Moved by: Theresa Bergeron
Seconded: Don Munro

That the Source Protection Committee receive and file the Committee membership update report.

CARRIED

c) Approval: Draft Sewage Policies

Resolution #23/23

Moved by: Jacqueline Pemberton
Seconded: Elaine Kennedy

That the Raisin-South Nation Source Protection Committee approve the proposed Sewage policy updates and direct staff to prepare draft policies for consultation with the province.

CARRIED

John Mesman left the meeting at 11:00 AM.

d) Approval: Draft Stormwater Policy

Resolution #24/23

Moved by: Jacqueline Pemberton
Seconded: Chris McDonell

That the Raisin-South Nation Source Protection Committee receive and approve the proposed Stormwater (SEWG-7) policy update; and,

Further direct staff to proceed with early engagement with the Ministry of the Environment, Conservation and Parks.

CARRIED



e) Low and Moderate Policy Review and Summary

Resolution #25/23

Moved by: Elaine Kennedy
Seconded: Jacqueline Pemberton

That the Raisin-South Nation Source Protection Committee receive and file a review of low and moderate threat policies from other Source Protection Regions and will be presented an update at a future meeting, as amended.

CARRIED

8. Community Engagement: Roundtable

- Jacqueline Pemberton provides an update to the Ontario Federation of Agriculture after every SPC meeting.

9. Correspondence

None.

10. Date of Next Meeting

The date of the next meeting is September 14, 2023 at 10:00 AM.

11. Adjournment

Resolution #26/23

Moved by: Elaine Kennedy

THAT the Source Protection Committee meeting of June 8, 2023 be adjourned at 11:40 AM.

Raymond Beauregard
Chair

Lisa Van De Ligt
Project Manager

/lv



To: Raisin-South Nation Source Protection Committee
From: Lisa Van De Ligt, Project Manager
Date: December 21, 2023
Subject: Project Manager's Update

RECOMMENDATION:

That the Raisin-South Nation Source Protection Committee receive and file the Project Manager's Update.

The last Source Protection Committee (SPC) meeting was held June 8, 2023. Since then, staff have continued to meet deliverables identified in the 2022-2024 agreement with the Ministry of Environment, Conservation and Parks (MECP) and on-going Drinking Water Source Protection (DWSP) initiatives. Below are the highlights:

- Raisin-South Nation Source Protection Plan Section 36 (Minister's Order) amendments underway. A draft amended Source Protection Plan and Assessment Reports were submitted to MECP for early engagement. Staff received feedback on November 22, 2023 from MECP. Staff have reviewed the feedback and will provide the SPC a summary via PowerPoint Presentation. Revised draft policies considering MECP and municipal feedback are provided in detailed staff reports.
- Five potential Raisin-South Nation Source Protection Plan Section 34 (locally-initiated) amendments are underway. Staff continue to work closely with municipalities and MECP on the files.
- As per 2022-2024 DWSP program agreement with MECP, a financial progress report was submitted to MECP by November 30, 2023 and final draft report will be submitted by January 31, 2024.
- Staff are finalizing the 2024-2027 workplan submission to MECP by the January 19, 2024 submission deadline.
- Staff will review the Annual Risk Management Official reports which must be submitted to Source Protection Authorities by February 1.
- Staff initiated and held two Drinking Water Source Protection Municipal Working Group meetings in October and November, 2023. Details are provided in a staff report.
- Additional meeting occurrences: Monthly Raisin-South Nation Source Protection Team meetings, monthly Eastern Region project managers meetings, quarterly provincial project manager and communications meetings.

A handwritten signature in cursive script, reading "Lisa Van De Ligt".

Lisa Van De Ligt,
Project Manager
Raisin-South Nation Source Protection Region



To: South Nation Source Protection Authority
From: Lisa Van De Ligt, Project Manager
Date: January 8, 2024
Subject: SPC Membership Update

RECOMMENDATION:

THAT the Source Protection Committee receive and file the Committee membership update report;

AND FURTHER THAT the Source Protection Committee support replacing the SNC Clean Water Committee representative seat with a General Public representative seat and direct staff to provide the amended Committee Procedural Manual and membership composition to the Source Protection Authorities for approval.

Background:

As outlined in the *Clean Water Act, 2006*, under Ontario Regulation 288/07, the Raisin-South Source Protection Committee (SPC) was created to develop a Source Protection Plan to protect municipal sources of drinking water in the region. The SPC oversees the source protection program, and the composition ensures that a variety of local interests are represented at the decision-making table. The SPC is comprised of 15 members, 4 liaisons and the Chair.

The current membership consists of:

- Five municipal representatives
 - City of Ottawa (1)
 - City of Cornwall (1)
 - United Counties of Stormont, Dundas, and Glengarry (1)
 - United Counties of Prescott and Russell (1)
 - United Counties of Leeds and Grenville (1)
- Five economic sector representatives
 - Agricultural sector (3)
 - Aggregate sector (1)
 - Industrial/commercial sector (1)
- Five other interest representatives
 - South Nation Conservation (SNC) Clean Water Committee (1)
 - Great River Network (1)
 - General Public (3)



Discussion:

Agriculture Representative Vacancy

There is currently a vacancy for one of the agriculture representative seats. On September 9, 2023, the Raisin-South Nation Source Protection Region published a notice of the vacancy on the Region's website, Conservation Authority websites, and social media. A notice was also circulated to media and local agriculture organizations. An application was received, and the candidate was interviewed in October 2023. The candidate was subsequently endorsed by five agriculture organizations located throughout the Region.

Staff will present a report to the Source Protection Authority Boards in February 2024 to officially appoint the new agriculture representative to the SPC.

Other Interest Representatives

There is currently a seat on the SPC for a representative from the SNC Clean Water Committee (CWC) under the "Other interest representatives". Glenn Mackey was appointed by the Source Protection Authorities as the CWC representative.

As of December 31, 2023, the SNC Board of Directors dissolved the CWC, along with their three other Standing Committees (i.e. Communications Committee, Fish and Wildlife Committee, and Forestry Committee) and approved the establishment of a new "Watershed Advisory Committee".

As such, a new "Other interest" sector representative is required. Staff recommend replacing the CWC representative with a fourth General Public representative. If supported by the SPC, staff will amend the SPC Procedural Manual and membership composition and seek approval from the Source Protection Authorities.

A handwritten signature in cursive script that reads "Lisa Van De Ligt".

Lisa Van De Ligt,
Project Manager
Raisin-South Nation Source Protection Region



To: Raisin-South Nation Source Protection Committee
From: Claire Lemay, Senior Planner
Date: January 5, 2024
Subject: Revised Draft Salt and Snow Policies

RECOMMENDATION:

THAT the Raisin-South Nation Source Protection Committee approve the proposed Salt and Snow policy updates and direct staff to prepare draft policies for consultation.

Background:

The Source Protection Plan is being revised as part of a comprehensive review under section 36 of the *Clean Water Act* and due to updated Provincial Technical Rules. The Technical Rules affect when certain activities are deemed a significant drinking water threat (SDWT).

A first draft was sent to the province for early engagement. Comments were received from the Ministry of Environment, Conservation, and Parks (MECP) on November 22, 2023. The comments from MECP recommended that policies addressing snow storage be separate from policies concerning road salt. The comments also noted that the proposed policies did not differentiate between exposed, partially exposed, and not exposed salt storage.

Discussion:

In response to comments received from MECP through the early engagement process, staff reconsidered the format of the policies concerning storage and handling of road salt and snow storage.

Snow Storage

Currently, the Source Protection Plan addresses snow storage within policies which also address the storage and handling of road salt. However, under O. Reg. 287/07, the storage of snow is listed as a separate prescribed drinking water threat activity and not combined with the handling and storage of road salt. Furthermore, circumstances C14.1.1 to C.14.1.6 of the 2021 Technical Rules define the circumstances under which the storage of snow is a low, moderate, and significant threat activity based on land use (i.e., commercial, or industrial) and the size of the area on which snow is stored.

A new and separate section of the Source Protection Plan has been drafted to address snow storage. Four new draft policies are contained in this new section.

The first two new draft policies apply to snow storage piles. A balanced approach is being proposed, including education and outreach for industrial and commercial sites and prohibition of snow storage at snow dumps.

The focus on commercial and industrial sites is based on the 2021 Technical Rules. Additionally, the proposed prohibition on snow dumps where snow is hauled from another location is being revised to focus on snow dumps that receive snow from areas where the predominant land use is industrial or commercial. This is consistent with the 2021 Technical Rules.

Land Use	Size of Snow Pile	Areas of Significant Drinking Water Threat
Industrial and Commercial Sites	≤ 200m ²	IPZ 10 / WHPA 10
	200m ² – 2000m ²	IPZ 9-10 / WHPA 10
	> 2000m ²	IPZ 8-10 / WHPA 10
Snow Disposal Facilities	≤ 200m ²	IPZ 10
	200 – 2000m ²	IPZ 9-10 / WHPA 10
	> 2000m ²	IPZ 8-10 / WHPA 10
Other Land Uses	Never a significant drinking water threat	

Two additional policies were added to address Snow Disposal Facilities, which are identified as a significant drinking water threat but for which no previous policies had been drafted. The new policies aim to manage the significant drinking water threat associated with any existing stormwater outfalls that serve a Snow Disposal Facility through a Prescribed Instrument. Future stormwater outfalls that serve a Snow Disposal Facility are proposed to be prohibited. Staff are not aware of any existing Snow Disposal Facilities within source protection areas in the Raisin-South Nation Source Protection Region.

The proposed new Snow policies are as follows:

Snow

Overview

Snow clearing collects contaminants from paved surfaces, which accumulate in snow piles over the winter. Melting snow piles then release chemicals which infiltrate into the ground and flow into rivers and streams.

The infiltration or discharge of snowmelt from the storage of snow on a site where the predominant land use is commercial or industrial by any means other than a storm water drainage system outfall is a drinking water threat.

A snow dump is a location used for the storage of snow from a different location during snow removal. Snow dumps often include snow from various land uses. Snow dumps that typically receive snow from areas where the predominant land use is industrial or commercial are a drinking water threat.

Policy Intent

Policy SNOW-1 requires education and outreach regarding snow storage on commercial and industrial sites.

Policy SNOW-2 prohibits existing and future storage of snow at snow dumps.

Policies SNOW-3 and SNOW-4 require that existing and future approvals of Snow Disposal Facilities under the *Ontario Water Resources Act* ensure that they would cause a significant drinking water threat through their stormwater drainage system outfall.

Policy SNOW-1

Education and Outreach for snow storage on industrial and commercial sites

The Raisin-South Nation Source Protection Region and the local municipality shall develop and implement an ongoing education and outreach program for the storage of snow on a site where the land use is predominantly commercial or industrial, where it would be a significant drinking water threat.

This program should be initiated within two years of the Plan, or any plan amendment, as applicable, taking effect.

Policy SNOW-2

Prohibition of Snow Dumps

The existing and future storage of snow at a snow dump, where it is or would be a significant drinking water threat, is designated for the purpose of section 57 of the *Clean Water Act*.

This policy should be implemented immediately upon the Plan, or any plan amendment, as applicable, taking effect.

Policy SNOW-3

Prescribed Instrument for Existing Stormwater Drainage System Outfall that Serves a Snow Disposal Facility or Area

Prescribed instruments for existing stormwater drainage system outfalls that serve a Snow Disposal Facility or Area should be reviewed and amended to ensure that the activity is not a significant drinking water threat or ceases to be a significant drinking water threat. At a minimum, the amended prescribed instrument should include reference to the applicable vulnerable area and appropriate risk management measures to protect the source of drinking water.

Prescribed instruments should be reviewed and amended within three years of the Source Protection Plan taking effect, or any plan amendment, as applicable.

Note: Additional policies apply. See: *MONITORING-3*.

Policy SNOW-4

Prohibition for Future Stormwater Drainage System Outfall that Serves a Snow Disposal Facility or Area

The Ministry of the Environment, Conservation and Parks, through approvals under Section 53 of the *Ontario Water Resources Act*, shall not permit the establishment of a stormwater drainage system outfall that serves a Snow Disposal Facility or Area, where it would be a significant drinking water threat.

This policy should be implemented immediately upon the Plan, or any plan amendment, as applicable, taking effect.

Storage and Handling of Road Salt

Draft policies to address the handling and storage of road salt have been revised to specify if the salt storage is exposed, partially exposed, or not exposed to precipitation or runoff.

Circumstances C13.1 to C.13.2 of the 2021 Technical Rules define the three sub-categories of handling and storage of road salt based on the level of exposure to precipitation and the amount of salt:

Level of exposure to precipitation	Quantity	Areas of Significant Drinking Water Threat
Exposed	< 10 kg	Not a significant drinking water threat
	10 - 20 kg	IPZ 10
	> 20 kg	IPZ 9-10 / WHPA 10
Partially Exposed*	≤ 100 kg	Not a significant drinking water threat
	> 100 kg	IPZ 10 / WHPA 10
Not Exposed**	Never a significant drinking water threat	

* Partially Exposed storage means the storage of road salt in an enclosure such as outdoor bins, salt boxes, tarps or containers, 3-sided storage sheds or domes, or by any other means where it has the potential to be exposed to precipitation, or runoff from precipitation or snow melt

** Not Exposed storage means the storage of road salt inside an area, facility, or structure in which the storage or (un)loading are roofed, walled, with an impermeable floor, where it does not have the potential to be exposed to precipitation, or runoff from precipitation or snow melt.

Policies SALT-2 and SALT-3 have been revised to remove references to snow storage and to specify whether the road salt storage is exposed or partially exposed. The revised policies propose a Risk Management Plan for existing partially exposed storage of over 500kg of road salt.

Future partially exposed storage of greater than 500kg of road salt and future and existing exposed storage of road salt is prohibited where it would be a significant drinking water threat. Staff are recommending prohibition under Section 57 of the *Clean Water Act* for existing exposed road salt storage at such low quantities because it is relatively easy to cover road salt, making it fall into the sub-category of “partially exposed”.

The 500 kg threshold for partially exposed road salt is based on the standard size of a salt storage bin commonly used in the region, as previously discussed with the Committee.

The proposed revised Salt policies are as follows:

Policy SALT-2

Risk Management Plans for existing storage of road salt

Existing partially exposed storage and handling of greater than 500 kg of road salt is designated for the purpose of Section 58 of the *Clean Water Act, 2006* (Risk Management Plans) where it could be a significant threat. The Risk Management Plan shall include up-to-date best management practices regarding salt storage.

Note: Additional policies apply. See: *MONITORING-1*, *GENERAL-5* and *GENERAL-6*.

Policy SALT-3

Prohibition of future storage of road salt

Future partially exposed storage and handling of greater than 500 kg of road salt is designated for the purpose of Section 57 of the *Clean Water Act, 2006* (prohibition) where it would be a significant drinking water threat.

Existing and future exposed storage and handling of greater than 20 kg of road salt is designated for the purpose of Section 57 of the *Clean Water Act, 2006* (prohibition) where it would be a significant drinking water threat.

This prohibition takes effect when the Source Protection Plan takes effect.

Note: Additional policies apply. See: *MONITORING-1* and *GENERAL-6*.

These draft policies will continue to be refined during the consultation with implementing bodies. Staff will complete field verification throughout the winter to assess what quantities of salt and snow are being stored in vulnerable areas. Continued consultation with municipalities, provincial ministries, and with the public will also help shape these proposed new policies.



Claire Lemay, Senior Planner
South Nation Conservation
Raisin-South Nation Source Protection Region



To: Raisin-South Nation Source Protection Committee
From: Alison McDonald, Managing Director, Approvals
Date: January 5, 2024
Subject: Municipal Working Group Update

RECOMMENDATION:

THAT the Raisin-South Nation Source Protection Committee receive and file the Municipal Working Group Update report.

Background:

A new Municipal Working Group was formed to provide feedback on proposed Drinking Water Source Protection policies that affect municipal operations. The Working Group includes planning and infrastructure staff from local municipalities and counties.

The first meetings were held on October 31 and November 28 to discuss proposed amendments to the Source Protection Plan and implementation challenges. The meetings were very well attended, and participants offered valuable feedback on proposed policies and implementation challenges.

Additional meetings of the Municipal Working Group are planned for 2024.

Discussion:

Early consultation focused on policies that have significant proposed changes, and that impact the municipalities the most. A feedback form was sent out to participating municipal staff following the October 31st meeting and 13 responses were received. Additional detailed comments were provided by City of Ottawa staff.

During the November 28th meeting, three group discussions were held on topics for additional consultation: Salt application and storage, sanitary sewer inspection and maintenance, and consolidated linear infrastructure environmental compliance approvals.

Proposed Policy Amendments – Salt Application and Storage

Municipal staff noted they all have and follow salt management plans for road salt application. They expressed concern related to appropriate salt application on parking areas for commercial and industrial properties. Municipal staff suggested we could supply industrial/commercial

property owners with recommended alternatives that allow them to meet insurance policy requirements (to reduce liability risks). A targeted outreach approach was recommended for industrial and commercial properties, with reminders about Drinking Water Source Protection signage, triggers for Risk Management Plans, and best practices for salt application. Social media was identified as an easy way for municipalities to share information with the public.

Municipal staff provided comments on the proposed prohibition of the storage of greater than 500kg of road salt and storage of snow at snow dumps where it is hauled from another location. Some municipalities foresee issues in implementation (compliance/lack of public awareness, staffing, financial, etc.).

Proposed Policy Amendments – Sanitary Sewer Inspection and Maintenance

Most municipalities indicated that inspection is already a regular part of the operation of the sanitary sewer system. However, some comments indicate the policy should be more specific about the type and frequency of inspections. Some municipalities reported that camera inspection and pressure monitoring is not possible for their systems.

The current policy SEWG-1 only addresses municipally owned infrastructure. There are no policies which apply to privately owned wastewater collection infrastructure. This was also identified as a potential gap in certain types of new development (including Winchester).

During the discussion with municipal staff on November 28th, amendments to the existing policy were recommended to allow more flexibility in inspection and monitoring methods, to require reporting from municipalities to ensure the inspections are productive, and for a risk-based timeline for inspections based on the type and age of infrastructure instead of the current 5-year and 10-year intervals. These changes will be proposed in the final versions of the policies, following the upcoming consultation period.

Proposed Policy Amendments – Consolidated Linear Infrastructure Environmental Compliance Approvals

Environmental Compliance Approvals were previously reviewed and issued by the province for each project or piece of infrastructure; these Approvals were captured by a Prescribed Instrument policy. Municipalities are transitioning to a new system where a single Consolidated Linear Infrastructure Environmental Compliance Approval (CLI ECA) is issued to the municipality for all the sewage works components of a municipal sewage collection system or a municipal stormwater management system.

CLI ECAs are issued to municipalities. The municipalities are authorized to make changes to the system when requirements in the CLI ECA are met. The intent of this change was to



streamline development approvals. It also means much more responsibility for local municipalities.

The province would no longer review or issue conditions for future infrastructure in these systems. This change from provincial approval to CLI ECAs has an impact on multiple policies that reference Environmental Compliance Approvals as a Prescribed Instrument.

Some municipalities indicated that the Ministry required them to develop procedures and plans to address approvals in vulnerable areas identified in the Source Protection Plan (WHPA and IPZ). Additional discussions are required as the Consolidated Linear Infrastructure approval process has been different for each municipality.

Municipal staff mentioned that more specific policies for stormwater management should be included if the prohibition on new stormwater management facilities is removed. There was a wide range of opinions from different municipalities regarding the best approach for managing stormwater management related threats.

Other Comments

Municipal staff took the opportunity to network and discuss drinking water related projects. Several municipalities are looking at options to expand water quantity, and some are facing water quality challenges.

Local municipalities in Prescott Russell were successful in getting a delegation with the Ministry of the Environment at the up-coming Rural Ontario Municipal Association conference to discuss funding to bring water to underserved municipalities.

Municipalities also described general resource challenges related to implementation of source protection policies. There is a need for support from the Source Protection Authorities to coordinate training and capacity building on education and outreach, planning, and Risk Management.

A handwritten signature in black ink that reads "Alison McDonald".

Alison McDonald, Managing Director, Approvals
South Nation Conservation
Raisin-South Nation Source Protection Region



August 4, 2023

Ministry of Municipal Affairs and Housing

Via email to: growthplanning@ontario.ca

Re: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

Thank you for the opportunity to comment on the proposed Provincial Planning Statement. The role of the Source Protection Committee is to protect the long-term supply of safe drinking water for residents and businesses in our region. While our mandate under the *Clean Water Act* is to protect sources of municipal drinking water through the Source Protection Plan, we are also concerned with the quality and quantity of water for areas serviced by private wells and septic systems.

We are concerned about the potential impacts of rural development on the long-term supply of drinking water for rural homes and farms. Increased development in rural and agricultural areas will generate increased demand on the aquifers that supply drinking water. Rural residents in certain communities have already shared water supply concerns for existing private wells.

It is well understood that septic systems can pose a threat to the quality of drinking water from private wells. Private sewage treatment requires ongoing maintenance which individual homeowners are not always aware of or financially able to perform. This can pose a risk to the quality of water in wells, especially for communities with greater density of development. Increased development on private sewage treatment systems should only be encouraged where it is clear that there is no risk to existing sources of drinking water.

It is of vital importance that we ensure that any increase in development on private services is supported by evidence that there will be no long-term negative impacts on water quality and quantity for existing rural land uses.

Research on groundwater recharge is required to determine if more housing is in fact possible in communities serviced by well water, without compromising the long-term viability of the water supply. Hydrogeological studies and water budget analyses should be completed prior to implementing policies that increase rural development on private services.

Once again, thank you for the opportunity to provide comments. We hope that you take our concerns into consideration in drafting the new proposed policy instrument.

Sincerely,

Chair Ray Beauregard,
Raisin-South Nation Source Protection Committee