



Monday January 27, 2020

Amy Shaw  
Ministry of the Environment, Conservation and Parks  
Guelph District Office  
1 Stone Road West  
Guelph, Ontario N1G 4Y2

Dear Amy:

**RE: EBR Notice No. 019-1051  
325 Eramosa Road, Guelph  
DRAFT CPU No. 3872-BFEMDL**

The City of Guelph is pleased to comment on the Government of Ontario's Draft CPU No. 3872 as issued under EBR Notice No. 019-1051.

### **1-General Comments from the City of Guelph**

The City of Guelph has a population of over 130,000 people and depends entirely on groundwater to provide drinking water to our community. Preserving and protecting our drinking water is a very high priority for the City of Guelph.

Since July 1, 2016, the City of Guelph has been implementing our Source Protection Program, in accordance with the Clean Water Act, 2006. The Source Protection Program is based on protecting current and future drinking water supplies based on managing threat activities that take place on the landscape. The program emphasis is primarily on managing existing and future activities, so managing historical activities presents a significant challenge, under the Clean Water Act, 2006 and associated regulations.

The process whereby a proponent seeks a CPU involves a considerable amount of investigation, effort and documentation to demonstrate the environmental conditions that exist on the property at the time that the CPU is requested. Given the historical land use in and around the subject property and ambient groundwater quality conditions documented on the subject property, we support Director's the inclusion of a Certificate of Requirement in the draft CPU (Section 4.7 and 4.8).

The City's Official Plan states:

"where a risk assessment approach is used for the purposes of filing a RSC in relation to Policy 4.4.4.5

i), the risk assessment must demonstrate that the City's raw drinking water sources for its drinking water system are adequately protected such that there is no potential for an adverse effect."

We note that assigning a non-potable designation to the site suggests that it would not be possible to install a drinking water well at the property boundary due to elevated concentrations of the

various contaminants of concern noted in the draft CPU. This designation that remains on title with the property and constrains the City from considering a new drinking water supply at or in close proximity to the subject property. As such, we have concerns as to whether the objectives of the above noted section from the City's Official Plan are being considered in the risk assessment as it relates to potential impacts to existing and future drinking water supplies.

1. The City of Guelph requests the opportunity for Sourcewater Protection staff to review and comment on the proposed property specific Soil and Groundwater Management Plan that will be developed for the site.
2. The City of Guelph requests that Sourcewater Protection staff be copied on all future soil and groundwater monitoring reports that are prepared for the site.

### **Closing**

Thank you again for the opportunity to provide comments on the Draft CPU for the above captioned property. The City of Guelph would be happy to discuss our comments further, should ministry staff feel that additional discussion is required.

Please do not hesitate to contact Leslie Muñoz, Manager, Policy and Intergovernmental Relations, at [leslie.munoz@guelph.ca](mailto:leslie.munoz@guelph.ca) if you have any questions or comments regarding the City of Guelph's feedback on this draft CPU.

Sincerely,



**Peter G. Rider, P. Geo., RMO,**  
Program Manager, Source Water Protection  
Water Services Division, Environmental Services Department  
City of Guelph  
519-822-1260 extension 2368