August 21, 2020

Ms. Eugenia Chalambalacis
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Ministry of Environment, Conservation and Parks
135 St Clair Avenue West
Toronto, ON M4V 1P5

RE: ***ERO No. 019-1080- Proposed changes to environmental approvals for municipal sewage collection works***

This submission is in response to the Ministry of the Environment, Conservation and Parks' request for feedback on the Consolidated Linear Infrastructure Approach. We appreciate being given this opportunity to express our views and provide our member firms' expert perspective on this topic.

For 45 years Consulting Engineers of Ontario (CEO), has been the non-profit advocacy association representing the business interests of engineering firms in the province. Founded in 1975 by the Ontario Chapter of the then Association of Consulting Engineers of Canada and the consulting engineers division of Professional Engineers Ontario, we have become a valuable advocate and resource for our member firms and represent approximately 150 companies employing nearly 22,000 people. Our industry generates a gross contribution to the Canadian economy of more than $31 billion annually.

Where "engineering" is a profession, "consulting engineering" is a business that makes engineering viable and sustainable. CEO represents our member firms who provide a wide range of engineering services to government and private sector clients. Their professional staff are not just engineers, but also technicians, technologists, geoscientists, architects and planners. Through their service offerings, CEO member companies directly impact the economic, social and environmental aspects influencing Ontario's quality of life.

These documents were circulated widely to CEO's membership for feedback. Those providing input all have an established history and extensive experience working with provincial and municipal public sector clients in Ontario. It is from this feedback that we offer the following constructive clause overview for review and discussion.

Yours truly,

Bruce G. Matthews P. Eng.
Chief Executive Officer

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CEO CLAUSE OVERVIEW:

DESIGN CRITERIA FOR SANITARY SEWERS, STORM SEWERS AND FORCEMAINS FOR ALTERATIONS AUTHORIZED UNDER ENVIRONMENTAL COMPLIANCE APPROVAL

CEO has provided commentary on specific sections within the *Design Criteria for Sanitary Sewers, Storm Sewers and Forcemains for Alterations Authorized under Environmental Compliance Approval* document. Each section has been divided into the issue, the rationale for change and finally the proposed changes/suggestions offered by CEO. We trust that the following suggestions will be considered as the document is finalized:

Definitions

ISSUE:

"Professional Engineer" means a person who holds a full licence to practice in the Province of Ontario;

RATIONALE:

It is important that this definition specifies the regulating body who grants the Professional Engineer licence and is consistent with definition found in the *Professional Engineers Act*.

PROPOSED CHANGES:

"Professional Engineer" means a person who holds a licence or temporary licence **issued by Professional Engineers of Ontario** under the *Professional Engineers Act*;

1.1. General Requirements

ISSUE:

1.1.1. *Alteration* to an existing *sewage collection system* by adding, modifying, replacing or extending existing sanitary or forcemains, and/or appurtenances, is not permitted when such works;

1. results in exceedance of uncommitted reserve hydraulic capacity of the downstream;
    a. sewage collection system including sewage pumping stations;
    b. receiving sewage treatment facilities

RATIONALE:

This clause should contain a distinction and/or consideration due to wet weather flows. Some sewage collection systems have reserve capacity for domestic flows, but surcharge under wet weather conditions (i.e. due to improper rain water leader connections to the sanitary, or other sources of inflow/infiltration) that may be alleviated in time due to Municipality-led programs to reduce wet weather inflow.

PROPOSED CHANGES:

CEO recommends that uncommitted reserve capacity calculations should be clarified in this clause regarding wet weather inflow.

ISSUE:

1.1.2 Alteration to an existing stormwater system by adding, modifying, replacing or extending existing storm sewers, and/or appurtenances, is not permitted when such works;

1. results in exceedance of uncommitted reserve hydraulic capacity of the downstream;
    a. conveyance system;
    b. the receiving stormwater management/treatment facilities; or
2. causes an adverse discharge to the natural environment; or
3. adversely impacts the approved effluent quality of stormwater works.

RATIONALE:

Alterations may be required anywhere along the conveyance system, but downstream constraints still exist such as undersized storm sewers. Upstream improvements or even extensions should be considered if the downstream impact is considered and accepted by the Municipality.

PROPOSED CHANGES:

CEO suggests that a provision is included for Municipalities to accept existing downstream impacts.

Section 2.1- Design Flows

ISSUE:

2.1.2.1 The Sewage flows listed on Table 1 may be used in the design for individual commercial facilities.

RATIONALE:

The current wording creates loopholes regarding minimum flow capacities.

PROPOSED CHANGES:

The Sewage flows listed on Table 1 may be used in the design for individual commercial facilities, **provided that the minimum flow capacity listed in 2.1.2.1 are maintained for the development in its entirety at all times.**

2.4 Flow Velocity

ISSUE:

2.4.3 In certain circumstances, such as rehabilitation/replacement of an existing sewer where deepening of individual sewer section will not be possible, design flow velocities of less than 0.6 m/s may be considered provided that appropriate measures are taken to facilitate frequent flushing and maintenance needs and the Municipality accepts the increased maintained requirements.

RATIONALE:

Top-end sewer extensions can also be limited to provide sufficient slope due to outlet constraints.

PROPOSED CHANGES:

In certain circumstances, such as **sewer extensions with downstream constrains or** rehabilitation/ replacement of an existing sewer where deepening of individual sewer section will not be possible, design flow velocities of less than 0.6 m/s may be considered provided that appropriate measures are taken to facilitate frequent flushing and maintenance needs and the Municipality accepts the increased maintained requirements.

Section 2.6.- Pipe Material

ISSUE:

2.6.1 All material used in the addition, modification, replacement, or extension of sanitary sewers including pipes, fittings, valves, devices, and materials used for the rehabilitation shall meet all applicable quality adopted by the Ontario Provincial Standards for Roads and Public Works and/or local municipal standards. Where applicable standards conflict, the more stringent standard shall apply. Prior to specifying pipe material, soils shall be assessed for contamination. Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons, unless soil remediation prior to construction provides satisfactory results

RATIONALE:

There are a number of naturally occurring compounds that could cause material incompatibilities, not only contamination.

PROPOSED CHANGES:

All material used in the addition, modification, replacement, or extension of sanitary sewers including pipes, fittings, valves, devices, and materials used for the rehabilitation shall meet all applicable quality adopted by the Ontario Provincial Standards for Roads and Public Works and/or local municipal standards. Where applicable standards conflict, the more stringent standard shall apply. Prior to specifying pipe material, soils shall be assessed for contamination and **for the presence of compounds**

that may negatively impact the suitability of the proposed materials. Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons, unless soil remediation prior to construction provides satisfactory results

Section 2.8- Pipe Cover and Frost Protection

ISSUE:

2.8.1 Sanitary sewers shall be installed at sufficient depth (greater than frost penetration) to prevent freezing. If this is not achievable, the sewer shall be insulated to provide the required protection. Insulation must be designed or verified by a Professional Engineer.

RATIONALE:

As per clause 1.1.4.1a), the design of the sewers must be prepared by a Professional Engineer, as such, the last sentence in this clause is redundant and should be removed.

PROPOSED CHANGES:

Sanitary sewers shall be installed at sufficient depth (greater than frost penetration) to prevent freezing. If this is not achievable, the sewer shall be insulated to provide the required protection. ~~**Insulation must be designed or verified by a Professional Engineer.**~~

Section 2.9 Sewers Installed below Seasonally High Groundwater Table

ISSUE:

2.9.1 Sanitary sewer systems which are installed lower than 0.5m the seasonally high groundwater elevation (SHGWT) shall be designed to minimize inflow and infiltration.

RATIONALE:

This clause requires the term “below” to be inserted to accurately describe the measurement.

PROPOSED CHANGES:

Sanitary sewer systems which are installed lower than 0.5m **below** the seasonally high groundwater elevation (SHGWT) shall be designed to minimize inflow and infiltration.

Section 2.10 Maintenance holes

ISSUE:

2.10.2 In circumstances where maintenance holes cannot be provided, an upstream maintenance hole at a distance of 30m (max) is required to facilitate maintenance.

RATIONALE:

The distance is provided but it is not specified from which two points that distance is measured or the configuration which is considered.

PROPOSED CHANGES:

CEO recommends that the two points that distance is measured or the configuration which is considered is included in this clause for clarity.

ISSUE:

2.10.5 Where a smaller diameter sewer line joins a larger one, the invert of the larger sewer shall be lowered to maintain the same energy gradient, or the pipe obverts are matched.

RATIONALE:

If this is not possible, it should be clarified if this requirement would be excluded from the consolidated ECA. Moreover, this type of decision should be at the discretion of municipalities.

PROPOSED CHANGES:

CEO suggests that suggests that the clause allows the municipality to accept this decision at their own discretion.

ISSUE:

2.10.6 A drop structure shall be provided for sewers entering a maintenance hole at an elevation of 610 mm or more above the maintenance hole invert.

RATIONALE:

The clause should specify that this pipe is an outlet pipe invert.

PROPOSED CHANGES:

A drop structure shall be provided for sewers entering a maintenance hole at an elevation of 610 mm or more above the maintenance hole **outlet pipe** invert.

ISSUE:

2.10.7 An external drop structure is recommended for all new maintenance holes. Where the difference in elevation between the incoming sewer and the maintenance hole invert is less than 610 mm, the invert shall be benched to prevent solids deposition.

RATIONALE:

The clause should specify that this pipe is an outlet pipe invert.

PROPOSED CHANGES:

An external drop structure is recommended for all new maintenance holes. Where the difference in elevation between the incoming sewer and the maintenance hole **outlet pipe** invert is less than 610 mm, the invert shall be benched to prevent solids deposition.

Section 2.11- Inverted Siphons

ISSUE:

2.11.10 Inverted siphons shall not be designed with sharp vertical or horizontal bends. The slope for the upward vertical leg shall be limited to 1:2 (V:H).

RATIONALE:

Proportional slopes are typically shown as H:V, not V:H.

PROPOSED CHANGES:

Inverted siphons shall not be designed with sharp vertical or horizontal bends. The slope for the upward vertical leg shall be limited to ~~**1:2 (V:H)**~~ **2:1 (H:V).**

Section 2.12- Service Connections (Service Laterals)

ISSUE:

2.12.2 The minimum diameter for a service connection to main sewer for gravity flow shall be 100 mm in diameter. Sanitary sewer pipes on both private and public side shall be colour coded green to avoid cross connections.

RATIONALE:

The clause should specify what “side” is being referred to for clarity.

PROPOSED CHANGES:

The minimum diameter for a service connection to main sewer for gravity flow shall be 100 mm in diameter. Sanitary sewer pipes on both private and public side **of the property line** shall be colour coded green to avoid cross connections.

ISSUE:

2.12.15 Cleanouts should be installed at or near property line to facilitate inspection and cleaning.

RATIONALE:

Some Municipalities have eliminated the need for a cleanout at property line because house setbacks are minimal and a cleanout is required at the foundation wall inside the building. Additionally, there are bylaws in place where the homeowner is responsible for maintenance of the lateral to the connection to the mainline sewer.

PROPOSED CHANGES:

Cleanouts should be installed at or near property line to facilitate inspection and cleaning **if required by the Municipality.**

Section 3.4- Anchors/Restraints

ISSUE:

3.4.4 Act requirements and inspection, operation and maintenance needs.

RATIONALE:

There appears to be an aspect missing in this sentence fragment.

PROPOSED CHANGES:

CEO recommends that this clause is revisited and clarified.

Section 3.5- Pipe Material

ISSUE:

3.5.2 Prior to specifying pipe material, soils shall be assessed for contamination. Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons.

RATIONALE:

There are a number of naturally occurring compounds that could cause material incompatibilities, not only contamination.

PROPOSED CHANGES:

Prior to specifying pipe material, soils shall be assessed for contamination and **for the presence of compounds that may negatively impact the suitability of the proposed materials.** Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons.

Section 3.10- Maintenance

ISSUE:

3.10.3 Cleanouts/drain chambers shall be provided at low points of a forcemain.

RATIONALE:

The goal of this clause is already achieved in 3.13.1.

PROPOSED CHANGES:

CEO recommends that this clause be removed.

Section 3.13- Drain Valves

ISSUE:

3.13.3 A drain pipe shall be connected from the chamber to the nearest wastewater pipe.

RATIONALE:

In many areas there are no potential wastewater pipes to connect to. This should be reflected in the clause.

PROPOSED CHANGES:

Where possible, a drain pipe shall be connected from the chamber to the nearest wastewater pipe.

Section 3.14- Service Connections

ISSUE:

3.14.1 Minimum diameter of a forcemain for a service connection is 100 mm in diameter. Grinder pumps or equivalent must be provided in the case the size of the forcemain is less than 100mm in diameter but not less than 75mm.

RATIONALE:

The minimum is stated then a smaller diameter is allowed.

PROPOSED CHANGES:

Minimum diameter of a forcemain for a service connection **without grinder pumps** is 100 mm in diameter. ~~**Grinder pumps or equivalent must be provided in the case the size of the forcemain is less than 100mm in diameter but not less than 75mm.**~~ **Where grinder pumps or equivalent are provided, the minimum diameter of the forcemain is 75mm in diameter.**

Section 4.0- Combined Sewers

ISSUE:

4.0. Combined Sewers

RATIONALE:

This section uses the abbreviated term “CSO” but does not define the abbreviation.

PROPOSED CHANGES:

Define CSO within Section 4.

Section 5.2- Runoff Calculations

ISSUE:

5.2.3 For calculating runoff for less frequent, high intensity storms for particular type of area in Table 2, upper values of the range shall be used. The lower value of the range may be used for shorter recurrence interval storms under conditions of moderate to flat slopes.

RATIONALE:

This clause references the incorrect table. It should reference Table 3.

PROPOSED CHANGES:

For calculating runoff for less frequent, high intensity storms for particular type of area in Table ~~2~~ 3, upper values of the range shall be used. The lower value of the range may be used for shorter recurrence interval storms under conditions of moderate to flat slopes.

Section 5.3 – Pipe Size

ISSUE:

5.3.1 Storm sewers shall be designed to flow at *Full Design Capacity* of the pipe. Storm sewer capacities shall be calculated using the Manning's equation with roughness coefficient (n) or equivalent as listed in Table 4 for all new pipes.

RATIONALE:

Full Design Capacity is italicized indicating it's defined, but it is not. If it is not defined it could be subject to interpretation (e.g.: Does it mean h=d? Peak capacity? Etc.)

PROPOSED CHANGES:

CEO recommends that Full Design Capacity be defined.

Section 5.4- Flow Velocity

ISSUE:

5.4.1 Storm sewers shall be designed, using most recent rainfall intensity, duration and frequency (IDF) curves available from the respective municipality for which the sewers are to be constructed. If the municipality does not have access to current IDF curves (including recent events), adjacent jurisdictions shall be consulted for IDF curves, and worst-case values shall be used in design.

RATIONALE:

CEO recommends that this clause slightly alters its word choice to make the intent of the clause clearer and more concise.

PROPOSED CHANGES:

Storm sewers shall be designed, using **the** most recent rainfall intensity, duration and frequency (IDF) curves available from the respective municipality for which the sewers are to be constructed. If the municipality does not have access to current IDF curves (including recent events), adjacent jurisdictions shall be consulted for IDF curves, and the **most stringent** values shall be used in design.

ISSUE:

5.4.3 The storm sewers shall be placed at a minimum slope of 1% on first leg of the system

RATIONALE:

This is not always possible, so we are suggesting alternate language to reflect that.

PROPOSED CHANGES:

Where possible, the storm sewers shall be placed at a minimum slope of 1% on first leg of the system. **Where this is not possible, additional maintenance or operational means shall be required.**

Section 5.5- Pipe Material

ISSUE:

5.5.1 Rigid and flexible pipes including but not limited to concrete, polyvinyl chloride (PVC) and high-density polyethylene (HDPE) pipes may be used in construction of storm sewers.

RATIONALE:

This clause serves no substantial purpose as all pipes are either rigid or flexible and the provided lists are not exhaustive.

PROPOSED CHANGES:

CEO recommends removing this clause.

ISSUE:

5.5.2 Prior to specifying pipe material, soils shall be assessed for contamination. Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons.

RATIONALE:

There are a number of naturally occurring compounds that could cause material incompatibilities, not simply contamination.

PROPOSED CHANGES:

Prior to specifying pipe material, soils shall be assessed for contamination **and for the presence of compounds that may negatively impact the suitability of the proposed materials.** Nitrile gaskets or equivalent shall be specified for soils contaminated with hydrocarbons.

Section 5.6- Pipe Cover and Frost Protection

ISSUE:

5.6.2 Storm sewers that are subject to traffic loading, a loading factor in accordance with the regulations, codes and by-laws of authorities having jurisdiction shall be considered for selecting depth of pipe cover. This includes but not limited to: Highway Bridge Design Code (for vehicular traffic), Railway Safety Act, and Transport Canada Act. Appropriate structural support must be provided to the pipes as required. If a protective sleeve is used appropriate sleeve material shall be selected based on the site conditions.

RATIONALE:

This clause requires additional language for clarity.

PROPOSED CHANGES:

For storm sewers that are subject to traffic loading, a loading factor in accordance with the regulations, codes and by-laws of authorities having jurisdiction shall be considered for selecting depth of pipe cover. This includes but not limited to: Highway Bridge Design Code (for vehicular traffic), Railway Safety Act, and Transport Canada Act. Appropriate structural support must be provided to the pipes as required. If a protective sleeve is used appropriate sleeve material shall be selected based on the site conditions.

Section 5.7- Maintenance Holes

ISSUE:

5.7.1 Maintenance holes shall be provided at each change in alignment, pipe size, grade, material and at all pipe junctions. For blind connections, an upstream maintenance hole at a distance of 30 m (max) is required to facilitate maintenance.

RATIONALE:

This clause implies that a maintenance hole is also required at each service connection, as those are also pipes.

PROPOSED CHANGES:

Maintenance holes shall be provided at each change in alignment, pipe size, grade, material and at all pipe junctions, **excluding service connection 150mm or less in diameter.** For blind connections, an upstream maintenance hole at a distance of 30 m (max) is required to facilitate maintenance.

ISSUE:

Table 5 Maintenance Hole Spacing- "Spacing (m)"

RATIONALE:

This clause needs to clarify that this is the maximum amount of spacing

PROPOSED CHANGES:

Maximum Spacing (m)

Section 5.8- Catch Basins

ISSUE:

5.8.2 Street catch basin spacing will vary with the street width, grade and cross fall, the location of pedestrian crossing points, intersections, low points and driveway depressions. Maximum Catch basin spacing shall be per Table 5.

RATIONALE:

This clause references the incorrect table. It should reference Table 6.

PROPOSED CHANGES:

Street catch basin spacing will vary with the street width, grade and cross fall, the location of pedestrian crossing points, intersections, low points and driveway depressions. Maximum Catch basin spacing shall be per Table ~~5~~ 6.

Section 5.9- Inverted Siphons

ISSUE:

5.9.10 Inverted siphons shall not be design with sharp vertical or horizontal bends, the slope for the upward vertical leg shall be limited to 1:2 (V:H).

RATIONALE:

Proportional slopes are typically shown as H:V, not V:H.

PROPOSED CHANGES:

Inverted siphons shall not be design with sharp vertical or horizontal bends, the slope for the upward vertical leg shall be limited to ~~1:2 (V:H)~~ 2:1 (H:V).

6.0. Foundation Drain Discharge Collection System (Third Pipe System)

ISSUE:

6.1.5 The minimum slope for the gravity pipes within the foundation drain collection system shall be 1%

RATIONALE:

This is not always possible in grade constrained areas, or if discharging to the surface.

PROPOSED CHANGES:

Wherever feasible, the minimum slope for the gravity pipes within the foundation drain collection system shall be 1%.

Appendix A: Inspection and Testing

ISSUE:

2.1.4 All new and rehabilitated sanitary sewers, maintenance holes shall be video inspected to evaluate the physical condition of a sewer pipe and to identify any obstructions in the sewer pipes. Any defects identified in the inspections shall be corrected and the respective pipe segments shall be re-inspected.

RATIONALE:

This clause asks for maintenances holes to be inspected, but the following criteria only notes pipes. CEO recommends the adjustment of the wording to reflect the proper criteria.

PROPOSED CHANGES:

Adjustment of the wording to reflect the proper and desired criteria based on the maintenance being performed.

ISSUE:

2.3 Leakage Testing

RATIONALE:

Leakage testing of ***all*** sewer and maintenance holes using these requirements appears excessive, specifically for storm sewers. There are many elements that need to be considered on how these tests will be completed, how to prevent inflow or outflow during tests or which sewers need to be tested.

PROPOSED CHANGES:

CEO recommends that more details are providing on this testing.

CEO CLAUSE OVERVIEW:

ENVIRONMENTAL COMPLIANCE APPROVAL (ECA) FOR A MUNICIPAL STORMWATER MANAGEMENT SYSTEM

1.0 Definitions

ISSUE:

"Municipal Stormwater Management System" means a stormwater management system or part of a municipal stormwater management system,

a. that is owned by a municipality or by a municipal service board established under the Municipal Act, 2001 or a city board established under the City of Toronto Act, 2006;
b. that is owned by a corporation established under sections 9, 10 and 11 of the Municipal Act, 2001 in accordance with section 203 of that Act or under sections 7 and 8 of the City of Toronto Act, 2006 in accordance with sections 148 and 154 of that Act;
c. that does not include municipally owned or operated waste disposal sites as defined under the EPA, and snow dump/melt facilities;
d. that does not include industrial or commercial sewage works

RATIONALE:

As some Municipalities develop industrial parks that support dry industrial land uses which by nature of their operations, they pose no greater risk to water resources than other uses that involve rooftops and parking lots.

PROPOSED CHANGES:

CEO recommends that the Ministry give consideration to an approval exemption for dry industrial land uses which pose no significant risk to local water resources due to their enclosed operations.

3.0 Alterations to the Municipal Stormwater Management System

ISSUE:

This section draws reference to relevant Asset Management Plan, Stormwater Management Master Plans, and Subwatershed Plans.

RATIONALE:

In many rural areas of Ontario, Stormwater Management Master Plans and Subwatershed Studies do not exist. It is critical that the absence of these studies in rural communities is noted in this clause and that a provision is written in the event that a relevant study does not exist.

PROPOSED CHANGES:

CEO recommends that to provide clarity to this clause the following language should be included:

Where such relevant background studies exist, designs shall refer to them; otherwise, agency consultations to confirm Stormwater Management design objectives are recommended.

4.0 Authorizations of Future Alterations for Storm Sewers, Ditches or Culverts - Additions, Modifications, Replacements and Extensions

ISSUE:

4.1.2 The storm sewer, ditch or culvert addition, modification, replacement or extension will not adversely affect the collection system's ability to maintain a gravity flow without surcharging any manholes, provide smooth flow transition to existing gravity storm sewers.

RATIONALE:

Often, Municipal infrastructure improvements projects need to be phased, and for practical reasons, cannot always upgrade all downstream components to the outlet.

PROPOSED CHANGES:

The storm sewer, ditch or culvert addition, modification, replacement or extension will not adversely affect the collection system's ability to maintain a gravity flow without surcharging any manholes, provide smooth flow transition to existing gravity storm sewers. **Wherever feasible, downstream capacity restrictions should be upgraded.**

5.0 Stormwater Management Facility Additions, Modifications, Replacement and Extensions

ISSUE:

5.5 Any alteration to LID or end-of-pipe Stormwater Management Facilities made under condition 5.1 shall be accompanied by a land survey before operation of the alteration.

RATIONALE:

The land survey requirement is vague and should be clarified.

PROPOSED CHANGES:

CEO recommends that the land survey requirement in this context is clarified (i.e.: legal plan, topographic, record requirements, etc.).

CEO RESPONSE:

Q'S & A'S: TRANSITION TO CONSOLIDATED LINEAR INFRASTRUCTURE ENVIRONMENTAL COMPLIANCE APPROVALS

QUESTION:

Question 18: *Will the terms and conditions in a Consolidated Linear Infrastructure ECA be different from the terms and conditions in my municipality's existing ECA?*

- The approval would include many of the same conditions and requirements; however, they would now apply to the entire system, instead of individual works.

ANSWER:

This answer is concerning. A specific section of the system may have a more onerous set of criteria based on use, site conditions, etc. and may need timely flushing, CCTV inspection, sampling, etc. By applying these clauses to the entire system, there may be unnecessary requirements placed on less critical parts of the system. It is highly recommended that site specific requirements are detailed out for specific sites and not covered under a blanket requirement for all. If the intent is to exclude these more onerous segments of the system from the consolidate ECA, then this needs more clarity.

QUESTION:

Question 7: *How will a Consolidated Linear Infrastructure Permissions Approach impact the ministry?*

- An integral component of this transition is the phase out of the Transfer of Review Program which uses the pipe by pipe approvals model.

ANSWER:

Where select Municipalities have Transfer of Review (ToR) powers for private works (i.e.: City of London, 2018), it is recommended that program not be abandoned as it can be of great benefit to project timelines for select private sector projects (incl. SWM, LIDs, etc.). A direct review process by the Ministry of Environment, Conservation and Parks (MECP) for such private, lot level works that overlap with 'plumbing' under Ontario's Building Code (OBC) might not simplify workload and approval timelines for MECP staff.

We recommend that the Ministry not abandon the ToR program for Municipal screening /review of private sector sewer and watermain works. Alternatively, lot level (private) sewer/watermain infiltration controls could be clarified as exempt from the *Ontario Water Resources Act* similar to O.Reg. 525/98 where such site works and private plumbing systems are typically reviewed under Municipal processes (i.e.: OBC, s.41 *Planning Act*).