

Saturday, August 22, 2020

Eugenia Chalambalacis
Client Services and Permissions Branch
135 St Clair Ave West
1st Floor
Toronto, ON M4V 1P5

RE: Proposal - Proposed Changes to Environmental Approvals for Municipal Sewage Collection Works (ERO 019-1080)

The City of Guelph (the City) appreciates the opportunity to review the Proposed Changes to Environmental Approvals for Municipal Sewage Collection Works (ERO 019-1080).

Overall, the City is supportive of:

- the direction taken by the Ministry,
- being actively engaged by the Ministry in the Wastewater Stakeholder Group, and
- having had the opportunity to attend the orientation webinars sponsored by the Ministry.

In particular, the City offers support for the following changes:

- Implementation of a Consolidated Linear Infrastructure Permissions Approach modelled after the existing permissions framework for municipal drinking water systems to reduce the time and coordination required to undertake low risk system expansions;
- Preparation of the new design criteria for sanitary linear infrastructure;
- Introduction of template documents that clarify the design and operation expectations of the Ministry to users; and,
- The proposed streamlining of the approval process by replacing existing individual pipe by pipe ECA's with one multi-media ECA for a municipality's wastewater sewage system and one multi-media ECA for a municipality's stormwater collection, treatment and disposal system.



All of which is respectfully submitted:

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