



Harden Environmental Services Ltd.
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Groundwater Studies
Geochemistry
Phase I / II
Regional Flow Studies
Contaminant Investigations
OMB Hearings
Water Quality Sampling
Monitoring
Groundwater Protection
Studies
Groundwater Modeling
Groundwater Mapping
Permits to Take Water
Environmental Compliance
Approvals

Our File: 0126

February 4, 2021

Township of Puslinch
7404 Wellington Road 34
Guelph, ON
N1H 6H9

Attention: Glenn Schwendinger
CAO

Dear Mr. Schwendinger:

Re: *Draft Water Quantity Management Implementation Guidance, Area Based Water Quantity Water Management and Priorities of Water Use*

We have read the *Draft Water Quantity Management Implementation Guidance, Area Based Water Quantity Water Management and Priorities of Water Use* provided by the Ministry of the Environment, Conservation and Parks. We focused our attention on how the Permit to Take Water issuing Director (the Director) could issue, amend, restrict or rescind permits (or for that matter any water use) in the Township of Puslinch according to this guidance. We expand our concern to ‘any water use’ as the Director may be given permission to restrict un-permitted water uses of less than 50,000 per day if there is cause.

The guidance document discusses only water taking in groundwater or surface water areas that are determined to be “under stress”. While there is not a good definition of stressed source areas, we can look to the Tier 1 through Tier 3 program and find that approximately 60% of the Township of Puslinch lies within the Well Head Protection Area – Quantity (WHPA-Q) for the City of Guelph and under certain future drought conditions the municipal system has been designated as a Significant Risk for quantity. It is thus likely that the northern two thirds of the Township could fall within the definition of stressed groundwater source area. If an area is deemed to be under stress, then the Director will prepare a Water Taking Management Strategy. A Strategy would include:

A. Goals and objectives,

B. description of management measures to support the goals and objectives,

C. monitoring and assessment actions, and

D. review, evaluation and continuous improvement of the strategy.

With respect to the Township of Puslinch, a Water Taking Management Strategy is not unwelcomed as the Township has on several occasions petitioned the MECP to consider cumulative impacts of water taking rather than a Permit by Permit approach.

The second part of the Guidance deals with priority of use. This hierarchy of use is as follows;

Priority 1 Drinking Water and Environment,

Priority 2 Agriculture,

Priority 3 Industrial and Commercial,

Priority 4 Other i.e. landscaping, water features

This does not seem like an unreasonable hierarchy of use except where Permits are issued for uses that fall under several priorities. A municipal water taking for instance will have a component of drinking water use (Priority 1) whereas the majority of use is usually Industrial and Commercial (Priority 3). In the Township of Puslinch, the vast majority of individual Permits fall under Priority 3. The guidance does not say municipal water use is Priority 1, the guidance says specifically that drinking water use is Priority 1. It is not unreasonable for the Township to seek clarification of this aspect from the MECP.

The Director may use the following tools to address conflict of use within an area of stressed groundwater or surface water;

- Restrict use
- Temporary reductions in use
- Applying trigger levels for use of water
- Encourage conservation of use
- Demand use of alternative sources
- Increase frequency of reporting

From the perspective of the Township of Puslinch, we suggest clarifying with the MECP that they will recognize that municipal uses include a number of Priorities (1 through 4) and should the Director be called into address a conflict of use between a municipality and surrounding area, that the lower priority uses within the municipality be looked at first as this will have an immediate benefit on drinking water use for the municipality. Changes to other permitted users in the Water Management Area cannot have an immediate benefit.

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Sincerely,

A handwritten signature in blue ink that reads "Stan Denhoed". The signature is written in a cursive style with a large initial "S" and a distinct "D".

Stan Denhoed, P.Eng., M.Sc.
Senior Hydrogeologist