

Wednesday, December 8, 2021

Juwairia Obaid
Senior Program Advisor
Environmental Assessment Branch
135 St. Clair Avenue West
Toronto, ON M4V 1P5

Dear Ms. Obaid,

RE: Amendments to exempt low risk sewage works from requiring an Environmental Compliance Approval (ERO 019-4456)

The City of Guelph (City) appreciates the opportunity to comment on the proposed amendment to exempt certain low risk sewage works from requiring an Environmental Compliance Approval (ECA) given that these proposed changes would reduce regulatory burden while ensuring ongoing environmental protections.

The City has a keen interest in the efforts the Ministry of the Environment, Conservation and Parks' (MECP) proposed changes that would remove the need to obtain an ECA for certain low risk sewage works to allow the City to begin operations and infrastructure projects faster under [O. Reg. 525/98: Approval Exemptions](#).

The City's comments on the proposed amendment to exempt low risk sewer works from requiring an ECA are described below:

Low impact development works located on single private residences

The City supports the proposed amendment referencing the utilization of low impact development (LID) when planning stormwater management for development projects. In addition, the proposed approach would lead to a reduction in time-consuming formalities, making it easier to build LIDs by removing the need to obtain an ECA. With this exemption in place, the City will be positioned to improve on its overall efficiency in delivering on projects.

Foundation drainage works

The City supports this proposed amendment given that permanent foundation drainage works already require a permit to take water (PTTW). Removing the duplicate requirement of completing an ECA for the same work would therefore streamline the process. This consideration reduces burden, administrative efforts, time, and associated cost for completing and submitting an application for an ECA.

Ultraviolet treatment for the control of zebra and quagga mussels in water pipes

The City supports this proposed amendment as it removes the requirement to obtain an ECA for equipment related to ultraviolet treatment of water pipes to control zebra and quagga mussels.

Further clarity on why the application of chemical based treatment for controlling zebra and quagga mussels was not considered for an ECA exemption would be helpful, including chlorination treatment of water pipes. There is knowledge of use permitting, labeling, and chemical-specific application regulations that support use of chemical controls.

Construction site dewatering

The City supports this proposed amendment that removes the requirement to obtain an ECA for sewage works that collect, transmit, treat, and dispose of stormwater and ground water taken during the dewatering of construction sites. Removing the requirement to obtain an ECA for sewage works related to construction site dewatering creates a level playing field and removing regulatory duplication reduces the City's burden.

We appreciate this opportunity to provide feedback and encourage you to reach out to the City if you have any questions on our submission.

Sincerely,

Jennifer Rose, General Manager

Infrastructure, Development and Enterprise, **Environmental Services**

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