



DRAINAGE SUPERINTENDENTS ASSOCIATION OF ONTARIO

July 26, 2023

President – Elizabeth Cummings
Town of Plympton-Wyoming
Phone: 519-519-845-3939
Email: ecummings@plympton-wyoming.ca

Vice President – Lorne Franklin
Robinson Consultants Inc.
Phone: 613-592-6060 Ext 123
Email: lfranklin@rcii.com

Director - Lindsay Dean
Town of Essex
Phone: 519-776-7336 Ext. 1410
Email: ldean@essex.ca

Director – Ken McCallum
Municipality of Huron East & Township
of Huron-Kinloss
Phone: 519-527-0160
Email: drainagesuper@huroneast.com

Director – Chris Dunn
Norfolk County
Phone: 519-426-5870 Ext. 8041
Email: Chris.Dunn@norfolkcounty.ca

Director – Jeremy Nyenhuis
Town of Innisfil
Phone: 705-436-3710 Ext. 4222
Email: jnyenhuis@innisfil.ca

Director-at-Large – David Moores
R. Dobbin Engineering Inc.
Phone: 519-882-0032 Ext. 203
Email: david@dobbineng.com

Director – Shannon Tweedle
R. J. Burnside & Associates, Woodstock
Phone: 519-340-2004
Email: Shannon.Tweedle@rjburnside.com

Secretary
Wray Wilson
P.O. Box 167
Fordwich, ON N0G 1V0
Email: dsao@dsao.net

RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

The Drainage Superintendents Association of Ontario have concerns as it relates to the creation of agricultural lot severances as the infrastructure established under the Drainage Act exists predominantly in rural agricultural areas. Often municipal drains are located adjacent to the roadway causing the potential that each additional entrance to service newly created lots would require an engineer's report under Section 78 of the Drainage Act.

It is well known that there is a provincial shortage of drainage engineers that author reports under the Drainage Act and there already exists a problem to have drainage reports completed within a reasonable amount of time to often deal with failing infrastructure. To add this additional workload on top of an already heavy workload for the limited number of drainage engineers across the Province will create significant delays to completing other necessary projects.

In addition, the creation of additional residential lots on formerly agricultural lands may result in significant constraints on the ability to complete typical drain maintenance activities, as indicated within the Engineer's report, involving work near proposed new residences, removal and spreading the accumulated sediment, etc. With new On-Site and Excess Soil Management regulation (O. Reg. 406/19), the challenges with dealing with additional trucking to deal with the excess soil are becoming increasingly costly to the landowners that pay into the drainage works.

The Drainage Superintendents Association of Ontario is not in support of the proposed creation of additional agricultural lot severances for the reasons outlined above.

Yours Truly

Elizabeth Cummings
Drainage Superintendents Association of Ontario
President