



December 21, 2023

Memorandum

To: Permit To Take Water Evaluator, Drinking Water and Environmental Compliance Division
West Central Region Office (Hamilton), 119 King Street West, Floor 12, Hamilton, ON

Submitted Online: Via Environmental Registry of Ontario website

CC: Courtenay Hoytfox, Municipal Clerk, Township of Puslinch

From: Kim Funk, Source Protection Coordinator, Wellington Source Water Protection

RE: **Ministry Reference Number 1000244484, Dream Summit Industrial (Ontario) Inc,
Permit to take water, 7474 McLean Road East, Puslinch**

General

1. The following comments are related to the above referenced Permit to Take Water (PTTW) application (Ministry reference number 1000244484, ERO Number 019-7909). This is an application for a new PTTW for 10 years. Water will be taken from two (2) wells for the operation, maintenance and repair of the facility's cooling and water treatment systems.
2. These comments are provided in regards to the *Clean Water Act*, Grand River Source Protection Plan and source water protection implementation by Wellington Source Water Protection, a partnership of the Wellington County municipalities. These comments should not be construed as a hydrogeological, engineering, ecological or technical review of the application. These comments are strictly provided in regards to our municipality's role in implementing the *Clean Water Act* and municipal source water protection.

Summary of Source Protection Vulnerable Areas and Drinking Water Threats

The subject property is located in:

- a) a Significant Groundwater Recharge Area (SGRA); and
- b) a draft Wellhead Protection Area for Quantity (WHPA-Q) with a significant risk level.

Attachments show the relevant mapping. Please note the subject property is not located in an Issue Contributing Area (ICA), a Highly Vulnerable Aquifer (HVA), or a Wellhead Protection Area for Quality.

3. Due to the site's location outside any water quality WHPA or ICA, and because the draft WHPA-Q is not yet in legal effect, there are no Significant Drinking Water Threat policies that currently apply.
4. Although significant drinking water threat policies do not currently apply for this site, approved policy WC-MC-22.1 in the Wellington County Chapter of the Grand River Source Protection Plan will apply in the future to this site once the draft WHPA-Q is approved. It is therefore recommended that the Ministry consider the policy text referenced below and add terms and conditions to the PTTW, where appropriate.

For reference, please see the PTTW policy wording WC-MC-22.1 below:

To ensure that any Consumptive Water Taking ceases to be a significant drinking water threat, where this activity is a significant drinking water threat as prescribed by the CWA, the MECP shall review and, if necessary, amend existing PTTWs and / or Drinking Water Works Permits to ensure that the Municipal Supply will not be adversely impacted, taking into consideration Tier 3 Study results / recommendations, water supply requirements for planned growth and prolonged drought outlined in Water Supply Master Plans and available data, reports and / or recommendations from monitoring programs established pursuant to policies in the County of Wellington Chapter of the Grand River Source Protection Plan. The MECP, where appropriate, shall consider establishing conditions in PTTWs and Drinking Water Works Permits to achieve this objective including but not limited to conditions which require:

- a. *groundwater and surface water monitoring related to municipal drinking water supplies;*
- b. *assessment of demand management: water needs assessment (review of permitted maximum takings) and water efficiency measures;*
- c. *a phased approach to assess impacts;*
- d. *information sharing with the MECP, Municipalities and conservation authorities including a condition of approval for permit holders to provide Municipalities and conservation authorities technical reports and monitoring data gathered pursuant to a condition of the PTTW (as per bullet a.) above);*
- e. *measures to increase the optimization of the municipal water supply system where appropriate; and*

f. drought management planning for drought sensitive wells/systems

The MECP shall circulate Environmental Registry notices for proposed new or amended PTTWs and Drinking Water Works Permits to the County, Municipalities and GRCA and have due regard for comments from the GRCA, County, and the Municipalities regarding proposed new or amended PTTWs and Drinking Water Works Permits and new or revised conditions of approvals related thereto.

It is recommended that the Ministry consider this policy and add appropriate terms and conditions to the subject property PTTW to address potential impacts, from the increased water taking, to the WHPA-Q and significant groundwater recharge areas.

5. Further to direction from the Township of Puslinch Council on June 16, 2021, staff are recommending that the Ministry consider the addition of low water response conditions to all Permits to Take Water within the Township, where appropriate. This recommendation is in light of the number of permits within the Township or in neighboring municipalities, including municipal Permits to Take Water. It is recognized that the Ministry will consider site specific situations for each Permit to determine whether low water response conditions are or are not appropriate. In general, our recommendation is to implement a condition or conditions in the Permit to Take Water that require the permit holder to reduce water taking in line with any Low Water Response declarations from the applicable Conservation Authority. It is our recommendation that for the reduction to be meaningful, the condition(s) should specify that the reduction not start from the maximum permitted value as most water takers do not reach their maximum permitted taking amount. Instead, it is recommended that the Ministry determine an appropriate threshold for the reduction in water taking to start from (ie monthly average, 5 year average of that particular month, past three month average etc).
6. Given this site is located within a draft Wellhead Protection Area for Quantity, and that it is our understanding that the City of Guelph will be remodeling their WHPA's within the next 5 years, we recommend that the Ministry consider reducing the period of water takings from 10 to 5 years.

It is requested that the Ministry consider the above recommendations while reviewing this PTTW application and add terms and conditions, as appropriate.



Sincerely,

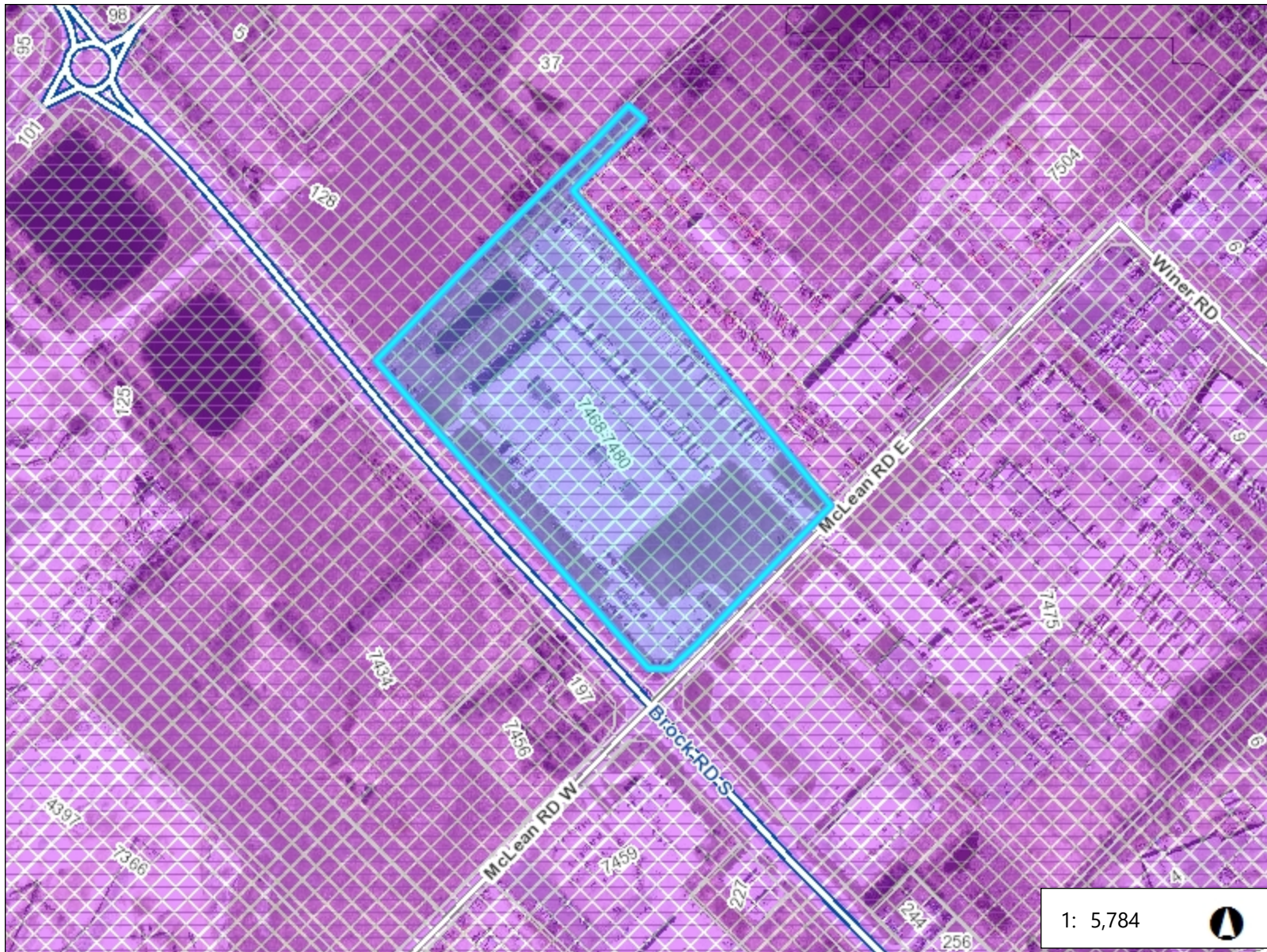
December 21, 2023

Kim Funk, Source Protection Coordinator

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Attachments – WHPA Map



Legend

- Parcels
- Roads**
 - Local Road
 - County Road
 - Highway
- Well Locations**
 - Existing
 - Proposed
- Vulnerability Score**
 - 10
 - 8, D; 8; 8, C
 - 2, 4, 6 (A, B or C)
 - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- WHPA Q1_Q2_Boundary
- WHPA Q1_Q2**
 - Approved
 - Draft
- SGRA
- RoadsLookup

0.3 0 0.15 0.3 Kilometers

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2022

Notes