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July 14, 2017

C. C. Tatham & Associates Ltd.
Consulting Engineers
115 Sandford Fleming Drive, Suite 200
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Attn. Suzanne Troxler, M.Sc., P.Eng.

Re Sarah Properties Ltd, Township of Amaranth
Waldemar Wastewater Treatment and Effluent Disposal Class EA Phases 1 and 2
Invitation to Comment

Dear Ms. Troxler

Further to my email of June 28, 2017 we are hereby providing comments on your Municipal Class EA for Wastewater Treatment and Effluent Disposal in Waldemar. Specifically, we are commenting on the material that was presented to us at the Public Information Centre held on June 7, 2017.

Problem Statement

While the Problem Statement is broadly open to various development options on the property, your assessment of various alternatives appears to be premised on a more narrow development plan that is specific to the 334 lot plan submitted by Sarah Properties Ltd. Our interpretation of the Problem Statement would in fact cause many of the alternatives to “meet project objectives”.

Identify Alternative Solutions to Problem or Opportunity

The distinction between Communal and Municipal wastewater systems has not been made clear on this project. We are of the opinion that Communal servicing is well defined by having the infrastructure collectively owned by a group of landowners but not the municipality.

Condominium ownership of the wastewater system would be required. It is our view that the current application is for a Communal system. The alternative solutions that were presented on June 7 were specific to Communal ownership and therefore excluded Municipal Ownership.

Municipal Ownership should be considered as a separate alternative, with attendant analysis. We note that attendees of the public meeting were told that the future ownership has not been determined, which contradicts the application and the wording used in the public documents. Hence the lack of clarity.

It should be noted that the Township does not currently provide wastewater treatment services and the request for consideration of a Municipal System Alternative is strictly to preserve the integrity of the EA process. Please note that we are not suggesting any preference at all for municipal ownership of the system and this comment should not be considered in any way as meaning that the Township would support a Municipal System Alternative.

Inventory Natural, Social and Economic Environment

Natural Environment Inventory

- Very little information was provided with respect to the Grand River and in particular, its assimilative capacity. Many questions asked by the public and public agencies about this information were unanswered. In our opinion, the material presented with respect to the condition of the Grand River was insufficient to support an evaluation of alternative solutions to the Problem Statement.

Social Environment Inventory

- There did not appear to be any inventory of the Social Environment. Many of the comments received from the public were directed at the impacts on the social environment. In particular, the lot size and density of development varied between alternatives and it would be useful to establish the social setting that the proposed development is being integrated into.

Economic Environment Inventory

- There did not appear to be any documentation of the Economic Environment in Waldemar. The Public raised a number of concerns about their property values, and when considering alternatives that provided a range of lot sizes, it would have been helpful to have had documentation of existing property size and value.
- Water utility rates in Waldemar have been and remain a highly sensitive and controversial issue. They should form part of the economic inventory.
- The variation in lot yield amongst the various alternatives has an economic impact on the developer's profitability and future taxation to the municipality. These inventories are needed in order to properly assess the alternatives.

Identify Impact of Alternative Solutions on the Environment and Mitigating Measures

With our concerns over the completeness of the inventory, it follows that the identification of impacts is also of concern.

- Alternatives that have higher lot yields will have a greater social impact on the existing community.
- Alternatives that require condominium ownership (Alternatives 3 & 4) may be more difficult to integrate with the existing community, thereby creating a different impact on the social environment.
- Alternatives that create different lot yields will have different impacts on the economical environments of the town, the developer and the existing community.
- Alternatives (3 & 4) that require the municipality to enter a Responsibility Agreement will have impact on the financial and social environments. The Township of Amaranth has not previously entered into any Responsibility Agreement and Township Council has not made any commitment to enter into such an agreement for the Sarah Properties development.

Evaluate Alternative Solutions and Identify Recommended Solutions

In general, we feel that not enough background material was provided to allow a complete review of the evaluation. We note that the Municipal Class EA requires "provision of clear and complete documentation of the planning process followed, to allow 'traceability' of decision making" and we are of the opinion that the documentation was not complete.

1. Do Nothing

- a) We agree with the conclusion, but for completeness we suggest that you should note in the summary that this alternative will have the least impact on the social, economic and natural environment.

2. Individual Septic Tank and Tile Bed at each Lot

- a) No documentation was provided to confirm the maximum lot yield would be 26 lots.
- b) There has been no planning opinion provided to assess this alternative in the context of the 2014 Provincial Policy Statement, the Growth Plan, the County and/or Township Official Plan.

As a preliminary matter, having reviewed the Information Board for this Alternative the Township notes as follows: The 2014 Provincial Policy Statement does permit infilling and minor rounding out of existing development on partial services (municipal water supply expansion and private septic system) provided there are no negative impacts, contrary to the Public Information Centre board references on this Alternative. With

respect to the reference to the Township Official Plan on the Public Information Centre board for this Alternative, the Township notes that under Ministry of Environment approval protocols a Responsibility Agreement would be required with the Township to permit a communal waste water treatment system. In assessing whether or not the Township is agreeable to entering into such an agreement, this would be a factor in determining the feasibility question under the Township Official Plan framework.

With respect to the County of Dufferin Official Plan, it specifically notes that Community Settlement Areas such as Waldemar are to experience only limited growth and are to maintain a rural settlement character. Further there has been no assessment of the growth management provisions of the County Official Plan and/or Township's Official Plan.

- c) It is not clear why you have included “potential groundwater contamination if septic systems fail” in the summary notes, but you did not include similar notes on Alternatives 3, 4 or 5.
- d) You have assessed impact on Groundwater Quality as “Very Poor/Very Negative”, based on the potential to increase Nitrate levels up to 10 mg/l. This assessment is unwarranted in our opinion as Nitrate levels below 10 mg/l are fully compliant with all Provincial standards. If the alternatives had been compared objectively, Alternative 3 elevates various constituents of the Grand River higher towards the Provincial Water Quality Objectives and would also have been considered as “Very Poor / Very Negative”.
- e) It isn't clear why you have assigned a “Very Poor / Very Negative” assessment to the impact on Drinking Water Supplies based on potential to increase bacteria and nitrate levels. We would assume that all of the Alternatives would be designed and approved on the basis of no impact to Drinking Water Supplies and that all options except “Do Nothing” would have the potential to impact drinking water in the event of a failure.
- f) Your “Very Poor / Very Negative” assessment of Impact on Drinking Water Supplies is clearly inappropriate when considering the quantity of water. With a lot yield of only 26 lots, this alternative has the least impact on existing drinking water supplies (with the exception of the “Do Nothing” alternative) and should rate considerably higher than alternatives having lot yields as high as 334 lots that would draw more water from the aquifer.

3. Communal WWTP with Effluent Discharge to the Grand River

- a) There were questions from the public about the location of the new effluent storm outfall that were not clearly answered. While the outfall may be a design detail that is addressed in Phase 3 of the EA process, it is also possible that an outfall location is problematic in this area which may render this Alternative as non-preferable. Greater detail of the social and natural environment in the area of the outfall and potential impact is warranted.

- b) "No Environmental Constraints" seems like an inappropriate summary comment for the creation of a new wastewater plant.
- c) Cost estimates should be accompanied with background material.
- d) Justification is required for your assessment of "No Impact" on groundwater or drinking water, particularly when Alternative 2 is rated "Very Poor/ Very Negative" and Alternative 4 is rated "Poor/Minor Negative". The former will introduce 308 fewer families and houses to this location while the latter brings 284 fewer houses and families. The smaller lots and additional families in Alternative 3 will bring more pets, more manicured lawns, more vehicles that potentially drip fluids, more demanding LID obligations and generally more activity that creates impacts impact on groundwater from things other than sewage disposal.
- e) Your summary statement "Aesthetic impacts can be mitigated" is a general comment that could be applied to the summaries of all Alternatives.
- f) Given that the requirement for an inter-municipal agreement is a separate consideration, the assessment of Approval Requirements should be the same with Alternative 3 or 5.
- g) You have given this alternative a "Very Good / Very Positive" score for ability to replace aging septic systems in the community. This is the highest score possible and was not awarded to any other alternative. However in our view it would be difficult to integrate existing freehold houses into a condominium held treatment system, as opposed to a municipal wastewater treatment system. Further discussion is required on the relationship between freehold houses and a condominium sewage system that they are not a part of and reconsideration of the scoring is suggested.

4. *WWTP with Discharge to Leaching Beds*

- a) Documentation should be provided with respect to lot yield.
- b) Documentation should be provided with respect to cost estimates.
- c) Impacts on Vegetation are not clear. This alternative has been assigned a lower score than all of the other options, yet the areas of impacted vegetation are not provided. We are of the opinion that the assessment should be made holistically. For example, the number of trees removed on the site of this leaching bed may be greater than those removed on the site of the treatment plant in Alternative 3, but the lower housing density associated with Alternative 4 may allow more trees to be preserved overall throughout the subdivision when compared with Alternative 3.
- d) If Operating and Maintenance costs are part of the decision making process, which they should be, then they should be documented for this and all other alternatives.

5. *Connection to Grand Valley WPCP*

- a) We understand that Grand Valley has just commenced a Class Environmental Assessment that includes expansion of its wastewater plant. It is therefore unclear why the timing of their expansion would be significantly different from the subject EA, which started less than six months ago.
- b) The proposed location of Sewage Lift Systems and forcemains does not appear to be optimal. It would seem more logical to route the initial forcemain through the new subdivision as opposed to disrupting an existing street.
- c) It is unclear why you have concluded that the cost per unit would be higher with two plants as opposed to a larger, single plant. We would also expect that operating costs would be lower with a single combined plant. We are aware that the Town of Erin is also currently in Phase 2 of a Class Environmental Assessment to consider wastewater treatment for its communities of Erin and Hillsburgh. It was reported in the Wellington Advertiser on June 30, 2017 that the Erin PIC was held on June 22nd and that the following information was presented: "... a single treatment plant is 27% less expensive than two treatment plants with two discharges for servicing the existing community. A single treatment plant is 32% less expensive than two plants for servicing full build out." We note that the distance between Hillsburgh and Erin is a least double the distance between Grand Valley and Waldemar.
- d) We are of the view that this option has not been fully explored. See comment 3(g).
- e) Your assessment of low score for Aesthetics, Noise, Visual and Odour is not justified. Residence time in the forcemain is mitigatable and many much longer forcemains are in service without any problems.

We look forward to future participation as you work through the next stage of the Class EA process.

**CORPORATION OF THE
TOWNSHIP OF AMARANTH**



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