



LONDON DEVELOPMENT INSTITUTE

August 17, 2020

Ministry of the Environment, Conservation and Parks
Client Services and Permissions Branch
1st Floor,
135 St. Clair Ave. West
Toronto, ON
M4V 1P5
Canada

ERO: 019-1080

Dear Eugenia Chalambalacis

RE: Proposed modernization of Ontario's environmental approval process for low-risk municipal sewage works.

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our City for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

On behalf of the London Development Institute (LDI) I am pleased to provide the following comments regarding the proposed changes to the Draft Design Criteria document, particularly, under Service Connections (2.12) item # 2.12.5.

The Draft Design Criteria 2.12.5 states the following:

"Cleanouts should be installed at or near the property line to facilitate inspection and cleaning."

Our first position: This item referring to "cleanouts" should be removed for the Design Criteria document.

After several years of difficulties in the practical utilization of cleanouts, the City of London, working with the Development and Building industry, has removed cleanouts from their design guidelines for residential development sites.

The primary problem with cleanouts is they must be installed early in the house building stage long before the front yards are filled, graded, and sodded. Accordingly, these cleanouts are exposed and during construction get broken off and, in some cases, the PDC's also get broken at the connection point. This damage can lead to unwanted ground and surface water entering the sanitary sewer system which can contribute to downstream basement flooding and increased treatment plant bypasses.



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Based on our members experience we recommend **removing** Item: 2.12.5 from the Draft Design Criteria document.

If, however, the MECP, wishes to maintain the reference to "cleanouts" in Section 2.12 Item 2.12.5 we would suggest alternative wording.

We would recommend the addition of the following wording to Item: 2.12.5 in **red**.

2.12.5. Cleanouts, **if required by the municipality or permitting authority**, should be installed at or near the property line to facilitate inspection and cleaning.

The current wording indicates the location, if used, the cleanout should be located on a property but not if it is required. The suggested additional wording would clarify the authority to require the use of a cleanout system in the Design Criteria document.

This wording addition would allow local municipalities to determine the requirement for the use of cleanouts as per local requirements and conditions.

If you have any questions or wish to consult with the London Development Institute in further detail on the issues raised, please do not hesitate to contact us. We are more than willing to meet with the Minister, his staff, or a Standing Committee of the Government of Ontario.

Thank you for your consideration.

A handwritten signature in blue ink that reads 'Mike Wallace'.

Mike Wallace
Executive Director