



758070 2nd Line E
Mulmur, Ontario
L9V 0G8

Local **(705) 466-3341**
Toll Free from 519 only **(866) 472-0417**
Fax **(705) 466-2922**

October 18, 2023

Ministry of the Environment, Conservation and Parks
Environmental Registry of Ontario

Re: ERO #019-6853, Streamlining permissions for water taking for construction site dewatering activities and foundation drains
ERO #019-6963, Streamlining environmental permissions for waste management systems under the Environmental Activity and Sector Registry
ERO #019-6951, Exploring changes to streamline the permit-by-rule framework
ERO # 019-6928, Streamlining environmental permissions for stormwater management under the Environmental Activity and Sector Registry

To whom it may concern,

The Township of Mulmur provides the following comments to the Ministry of Environment, Conservation and Parks on the ERO postings;

1. Mulmur Township generally supports local decision making and removing red tape. However, Mulmur does not have inhouse hydrogeologist to provide the local oversight in a self-registering program without Ministry peer reviews. In addition, the Township is concerned with removal of oversight on projects that may be outside of a municipality's jurisdiction and ability to provide other restrictions.
2. The Township would encourage the permit-by-rule and self-regulating Environmental Activity and Sector Registry (EASR) system to include a notice to the hosting municipality such that the Township is aware that a project has submitted or registered through the Provincial process. The host Township should also be provided with access to the engineering submission for the project at this time. This will assist the Townships in ensuring that it is not duplicating Provincial requirements and is working in tandem, and making decisions based on the same information. This will also allow municipalities to monitor cumulative impacts.
3. While Mulmur does not currently operate a municipal sanitary sewer system, it does maintain a storm water system, and Council believes that the municipality should maintain the control to regulate sewer use by-laws related to foundation drain

systems, as the Township is ultimately responsible for the costs of maintaining a municipal system. The Township is concerned that without monitoring there could be a slow creep, and capacity and/or financial implications to the Township. For these reasons, the Township believes that it should continue to have the authority to regulate the discharge into its system that is proposed to be below the regulated quantity.

4. The Township understands that the removal of conservation authority involvement related to dewatering reflects the Provincial decision related to conservation authority mandates, and this proposed change provides consistency across legislation.
5. The Township supports removing the overlap for projects that historically have required both a Permit To Take Water and an Environmental Compliance Certificate (ECA).
6. The Township is concerned that the type of projects requiring an ECA that would be allowed to self register includes a number of uses with significantly large hard-surfaced areas and that could have more significant environmental impacts, and would prefer more criteria be established that is impact driven opposed to numerical or broad categories of uses. The Township supports the requirements that self-registration will still require that a Licensed Engineer prepare the following: Design Report (must consider prescribed effluent limits and identify any nearby receptors that may be negatively impacted); Operations and Maintenance Manual; ESC Plan; Spill Contingency Plan; and Obtain approvals from municipalities and other agencies
7. With respect to the permit-by-rule framework, the Township would encourage expediting projects by municipalities and reducing the oversight on projects where the municipality has an oversight or approval role.

Thank you for the opportunity to review and provide comments on the proposed legislation.

Respectfully submitted,

Tracey Atkinson

Tracey Atkinson, BES MCIP RPP, M.M Dipl
CAO/Clerk/Planner

TOWNSHIP OF MULMUR