



## **Severn Sound Environmental Association**

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Submitted online to:

Ministry of the Environment, Conservation and Parks

Permissions Modernization Team

Client Services and Permissions Branch

135 St. Clair Avenue West

Toronto, ON M4V 1P5

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RE: Streamlining permissions for water takings for construction site dewatering activities and foundation drains - ERO number 019-6853

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The Severn Sound Environmental Association (SSEA) appreciates the opportunity to comment on the *Streamlining permissions for water takings for construction site dewatering activities and foundation drains, ERO number 019-6853*.

The Severn Sound watershed is in southeastern Georgian Bay. The SSEA is a Joint Municipal Service Board under the Municipal Act and works closely with eight lower tier municipalities (Midland, Penetanguishene, Tay, Tiny, Springwater, Georgian Bay, Severn and Oro-Medonte) and two upper tier municipalities (County of Simcoe and District of Muskoka) in the Severn Sound area, as well as provincial and federal government agencies and non-government organizations. The SSEA's mission is ensuring exceptional environmental quality through exemplary stewardship of the Severn Sound area through sound science, collaboration and partnerships. The SSEA collects environmental data and provides expertise to member municipalities, works to keep water clean so it supports healthy terrestrial and aquatic ecosystems, and has been heavily involved in municipal drinking water source protection activities, as well as in identifying and documenting natural heritage features for several member municipalities for use in their Official Plan updates. The SSEA is the local Source Protection Authority in the Severn Sound area.

We urge the Province to ensure all water takings through the Permit to Take Water Process are accounted for and considered based on a cumulative potential impact on Ontario groundwater sources. It is critical that new and existing home, whether on municipal or private water supply, have access to clean abundant drinking water. There are areas in the Province, including in the Severn Sound Source Protection Authority Area, that have delineated WHPA – Qs (under the Clean Water Act) as results of tier 3 water budgets. In these areas there are risks of insufficient or inadequate water volumes in the future. We ask that the Province under this current proposal consider and explain the implications of this ERO proposal for these areas.

Thank you again for the opportunity to offer feedback. The Severn Sound Environmental Association is dedicated to working with our eight municipal members to ensure residents have access to safe and sufficient sources of drinking water. Please continue to include the SSEA in engagement and development of this process as the Regulations are finalized.

Sincerely,



Melissa Carruthers  
Manager Source Water Protection, RMO/RMI