



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

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RE: Environmental Registry of Ontario Number 019-6928

Streamlining environmental permission for stormwater management under the
Environmental Activity and Sector Registry (EASR)

The Severn Sound Environmental Association (SSEA) appreciates the opportunity to comment on the *Streamlining environmental permission for stormwater management under the Environmental Activity and Sector Registry*, August 2023.

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 offer the following comments regarding the above noted ERO posting Number 019-6928 on *Streamlining environmental permissions for stormwater management under the Environmental Activity and Sector Registry*.

General comments

1. The Province is commended on trying to find efficiencies and streamline processes, however, clarification as to how you will ensure no negative impact to the local environment and aquifers is requested. Specifically, for stormwater management works on commercial, institutional, and light industrial sites that would be required to self register through an EASR process.
2. We encourage the Province to not allow a significant drinking water threat (as defined in the Clean Water Act) to be considered an activity eligible to register on the EASR for the following reasons:
 - Relies on reactive compliance tools (desktop audits, site inspections, enforcement orders) rather than proactive oversight and up-front review, assessment, and approval by ministry staff. This goes against the purpose of the Clean Water Act; to protect before it happens.
 - Activities that pose a potential risk to drinking water sources warrants timely engagement, input, and consultation with various stakeholders, which will now be removed.
 - Relies on LEP discretion to determine if the activity is a significant drinking water threat and implement additional mitigation measures to protect drinking water sources. It is assumed the LEP would/should be consulting with MECP, the local Risk Management Official or local Source Protection Authority to determine if the activity is a significant drinking water threat, therefore negating streamlining the process.
 - Raises concerns that the ministry may not have adequate staffing resources to effectively enforce compliance.
3. We are concerned that if current source protection plan policies are removed, this could create a gap in protections. If the proposed changes are approved, clarity is requested around if policies in local source protection plans can remain enforceable, and if new ones can be created, as well as roles of the various stakeholders (i.e., who can enforce, MECP, RMOs, municipalities, etc.).

4. Please provide clarity around Low Impact Development features, and in what circumstances would they be included in the EASR process, or excluded, is requested.
5. Communication between the Province and local Risk Management Officials regarding who has self registered, would be helpful to guarantee limited to no risk is on the landscape in vulnerable areas and to ensure the multi barrier approach to protecting municipal drinking water remains in intact.
6. The Province is encouraged to add a mechanism for monitoring EASR applications regarding water quality, quantity (both leaving the site and what is being put back into the aquifer), and human health. Therefore, assuring a sustainable and safe drinking water source for private and public drinking water systems.

Thank you again for the opportunity to offer feedback on *Streamlining environmental permission for stormwater management under the Environmental Activity and Sector Registry*. 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