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To:	Permissions Modernization Team Ministry of the Environment, Conservation and Parks	From:	Piero Amodeo Hamilton ON
File:	ERO#019-6928	Date:	October 30, 2023

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**Reference: Streamlining Environmental Permissions for Stormwater Management under the Environmental Activity and Sector Registry, ERO# 019-6928**

Based on our review of the proposal to streamline environmental permission for stormwater management (ERO#019-6928), Stantec has the following comments to provide:

### **MULTI-UNIT RESIDENTIAL STORMWATER**

- Can eligibility criteria for EASR registrations for multi-unit residential properties be expanded to include discharge to a storm sewer? Current proposal is for multi-unit residential properties that discharge to a combined sewer or natural environment.

### **STORMWATER PROPOSED REGULATORY REQUIREMENTS**

- Spill Contingency Plan (SCP)
  - Will a guideline or standard for SCP be provided for commercial, institutional and light industrial activities to follow to ensure plans provide the applicable information and details, ensure consistency across land-uses and sites, ensure costs to prepare these documents are optimized.
  - Do you need an SWM ECA instead of an EASR if you are in a source water protection area for drinking water for commercial, institutional and light industrial activities?
- Operations and Maintenance Report (OMM)
  - Will a guideline or standard be provided for OMM for commercial, institutional and light industrial activities to follow to ensure plans provide the applicable information and details, ensure consistency across land-uses and sites, ensure costs to prepare these documents are optimized.
- Effluent Limits
  - Monitoring results have shown that stormwater management facilities can exceed 25mg/L for certain periods during any storm event. The 2003 MOE SWMPDM acknowledges this by requiring that development applications provide enhanced water quality treatment achieving 80% TSS removal instead of an effluent target. The proposed effluent limit for TSS concentration of 25mg/L conflicts with the MOE 80% TSS removal rate. Which one governs?
  - Collecting samples for testing in a laboratory are expensive and time consuming. In-field turbidity meters would be preferred testing technique.
  - Will a standard methodology be provided for determining the background turbidity levels for nearest water body?

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- Will there be a standard methodology for type and duration of monitoring provided for sites that are EASR eligible?
- Transition for ECA Holders
  - For existing sites that have an existing ECA's for stormwater (i.e. private multi-unit residential, industrial, institutional, commercial) that are eligible to self-register must self-register under the EASR within 5 years of the proposed regulation taking effect or if modifying works on site that may require an ECA amendment.
    - What is the benefit to the existing ECA holder to transition to the EASR? Is this process mandatory?
    - Will all private ECA holders that may qualify be notified of this requirement? Will the ministry provide a list of the qualifications for EASR eligibility, as well as steps to be taken if works are to be registered under the EASR to the ECA holders?
    - If an existing site with an existing ECA's is transitioned to the EASR would the ECA conditions be replaced by the EASR requirements/conditions?
    - Are there plans to phase these transitions over the 5 year period?

Sincerely,

**Stantec Consulting Ltd.**

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