



**KAWARTHA
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ERO Comments for 1078815 Ontario Inc. Permit to Take Water Application

Low Water Considerations

Low water conditions should be a consideration for all water taking locations within the proposed application, especially from Source Name: Lake Scugog (Reach), as Lake Scugog is fully supplied by the lands around it, which is different from the rest of the Kawartha Lakes, as they inherit waters from other lakes and large river systems. Depending on the severity of Low Water conditions declared (Level 1, 2 or 3), water takings from these locations should be reduced or halted depending on the declared condition. Applicants can monitor low water conditions through their local Conservation Authority or Ministry of Natural Resources. Continuing to extract water from these locations in low water conditions can put a stress on municipal water supply, increase fish stress and mortality, reduce water quality, and elevate conflict among water users. We recommend a condition be placed within the permit to recognize this.

Source Water Considerations

File no. PTTW_6506-A2SJKH-36 for Norland (Lot 1, Con 14 Somerville) and Bobcaygeon (Lot 15, Con 10 Verulam) requires consideration of risks associated with water taking activities in proximity to a municipal drinking water intake. Where water taking occurs within an Intake Protection Zone 1 (IPZ-1), the activity may constitute a significant drinking water threat under the Clean Water Act, 2006, Technical rules 2021, subject to the applicable vulnerability score and threat circumstances.

A risk assessment should be undertaken to evaluate whether the proposed water taking could adversely affect municipal drinking water demands during periods of highest pumping for both the municipality and the proponent, as well as during periods of lowest water levels. The activity must not result in a reduction in water levels that would create an unacceptable impact on any water use. The assessment should include scenarios that consider factors influencing source vulnerability, including drought, climate change, and other conditions affecting water availability.

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Given the region’s recent drought conditions and observed low aquifer levels, an evaluation of groundwater levels should be undertaken for File Nos. PTTW_6506-A2SJKH-36 (Lot 7, Con 4 Emily) and PTTW 3105-A2NJHG-36 (Lot 22, Con 9 Manvers) to determine whether existing or proposed pumping has, or may have, an effect on local community well conditions during periods of low water availability. Municipal data should be utilized where available, and consideration should be given to conducting a community survey to inform the assessment of potential impacts on private well users.”

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