

May 31, 2024

**Subject: Source Protection Plan Pre-Consultation, Section 34 Plan Amendments**

On behalf of the Source Protection Committee for the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Region, it is my pleasure to provide **Preliminary Source Protection Plan Policies** as part of the Source Protection Plan Pre-Consultation process under Section 34 of Regulation 287/07 of the *Clean Water Act, 2006*.

Regulation 287/07 requires that the Source Protection Committee consult with bodies responsible for the implementation of Source Protection Plan policies before the publication of draft policies. Comments received as part of the Pre-Consultation process will be reviewed by the Source Protection Committee and possible changes made to policies prior to public consultation. **The deadline for comments regarding the Preliminary Source Protection Plan policies is August 1, 2024.**

Attached to this letter are details of proposed Source Protection Plan amendments as follows:

1. New/amended Wellhead Protection Areas (WHPAs) for Scott Point and Minto Pines;
2. Revisions to chapter 4 of the Saugeen Valley Assessment Report to reflect changes to the Scott Point and Minto Pines drinking water systems, including updated risk assessments;
3. Updated mapping for managed lands, livestock density and impervious surfaces due to changes to the Scott Point and Minto Pines WHPAs;
4. Policy changes (02-05) for discretionary septic maintenance inspections – Lake Rosalind; and
5. Minor edits to source protection plan snow storage threat policies and impervious surface area map legends made under Sec. 51.

Drinking Water Source Protection staff are available for individual meetings throughout the Pre-Consultation process if necessary. Please contact the Drinking Water Source Protection office if such a meeting is required.

The Source Protection Committee looks forward to your involvement in the Pre-Consultation process. Should questions arise, please do not hesitate to contact Carl Seider, Project Manager of the Drinking Water Source Protection program via email at [c.seider@waterprotection.ca](mailto:c.seider@waterprotection.ca).

Sincerely,

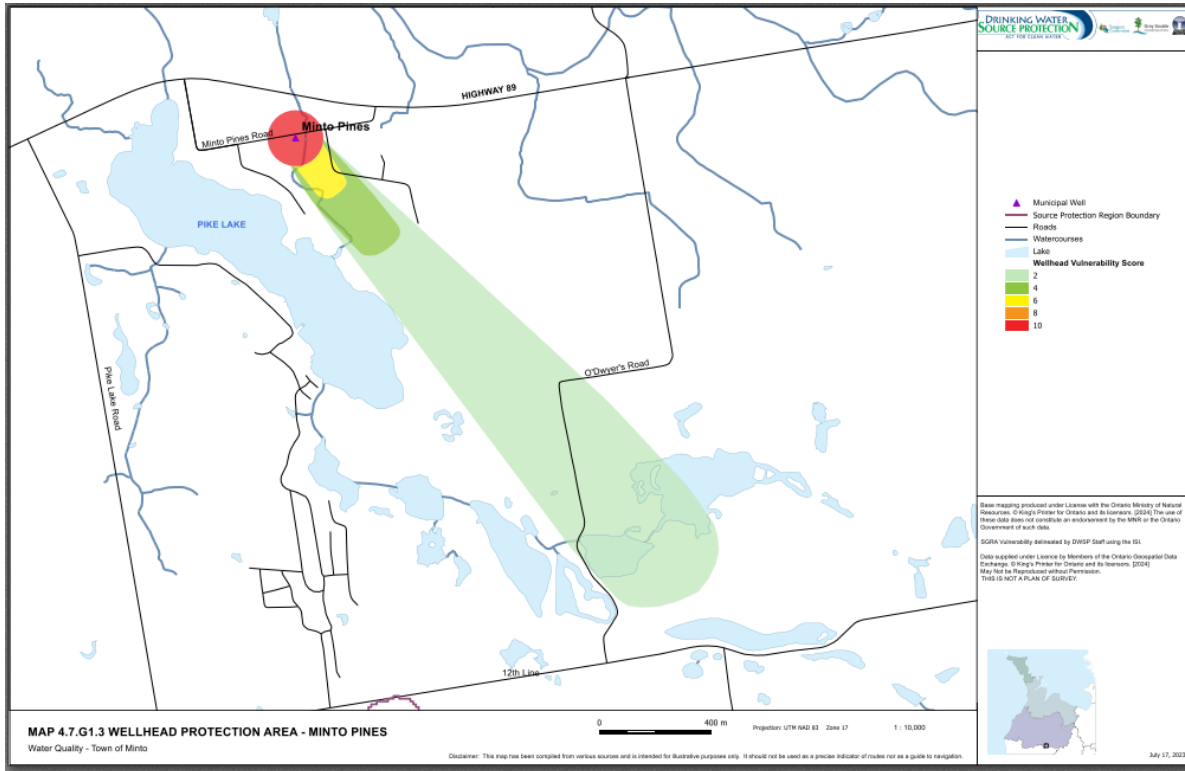
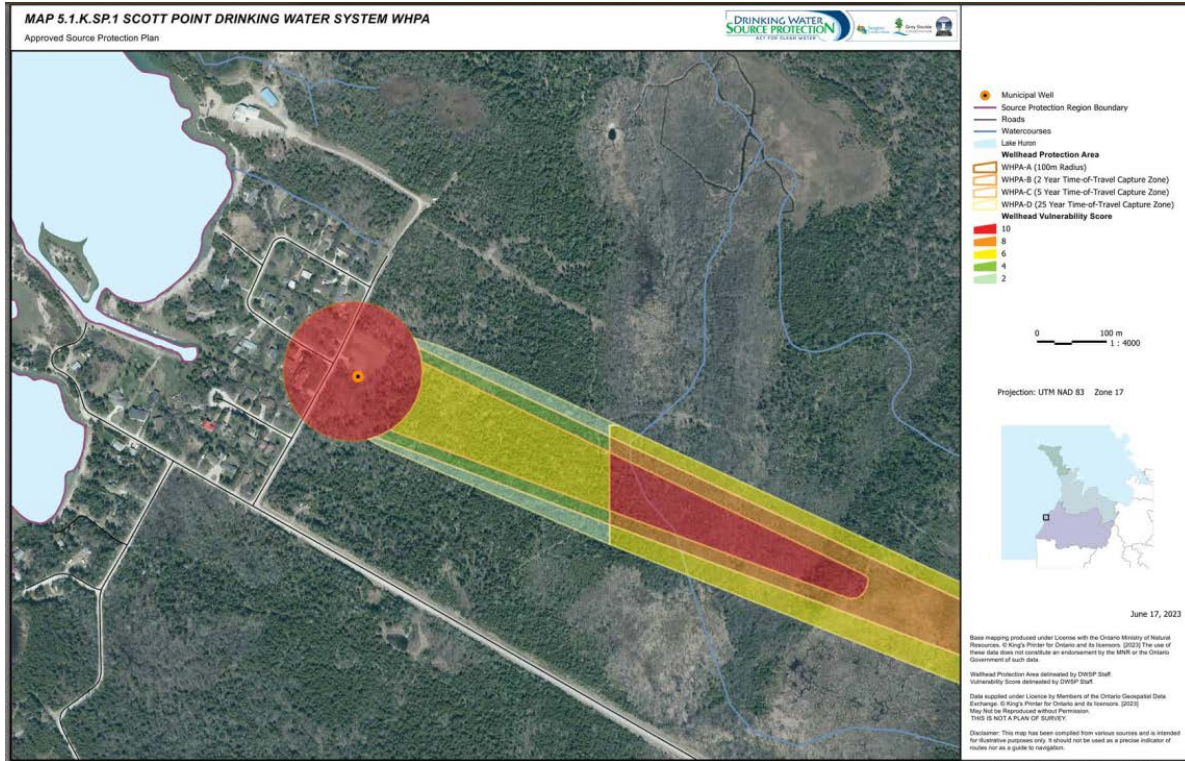


Carl Kuhnke, Chair  
Source Protection Committee  
Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Region

cc: [laura.collings@ontario.ca](mailto:laura.collings@ontario.ca)

# Proposed Source Protection Plan and Assessment Report Amendments

## 1. New/amended Wellhead Protection Area (WHPA) delineations to address new Scott Point (Well #2) and Minto Pines (Well #1A).



## **2. Revisions to chapter 4 of the Saugeen Valley Assessment Report**

### **Scott Point**

Scott Point Well #1 was abandoned in 2023 and replaced by a new Well #2 that was constructed in 2022 at a depth of 73.2 m. The new Well #2 is located approximately 200 metres East of the original Well #1 at a depth of 73.32 metres.

The original groundwater model was inspected for appropriateness and applied in the Municipality of Kincardine as a part of a WHPA delineation for the new Scott Point Well #2. The model is regional in extent, such that the model boundaries do not impact the WHPA delineation results. The new well location is located within the existing refined model grid. The only modification to the model was adding the new Scott Point Well #2, associated particle locations for delineating the WHPAs, and the additional records from the Water Well Information System (WWIS) drilled since 2000 for evaluating the model calibration.

Given the Scott Point Well #2 is approximately twice as deep as Scott Point Well #1, vulnerability scoring will be even more overestimated than in the previous study. Overall, the threats assessment of the new Well#2 identified a reduction of 2 residential properties within the WHPA where sewage systems threats applied.

### **Minto Pines**

The Minto Pines Well #1 was drilled in 1982 to a depth of 41.5 m. It was screened in the interval 23.9 - 41.5 m. Well #1 was inspected in 2017 with a reported condition of “fair to poor” and recommended for replacement. The replacement Well 1A was constructed in 2023 to a depth of 38.1 m, with a stainless steel casing installed to a depth of 26.5 m. Well 1A was completed in the same aquifer as Well 1 at a distance of 6 metres north.

In 2023 R.J. Burnside & Associates Limited (Burnside) was retained by the Town to obtain a new Permit to Take Water and review possible source water protection implications. Based on their review, Burnside recommended that the existing WHPA B, C and D areas for Well 1 be retained, with an amended WHPA A re-drawn to account for the shift of Well 1A, 6 metres to the north.

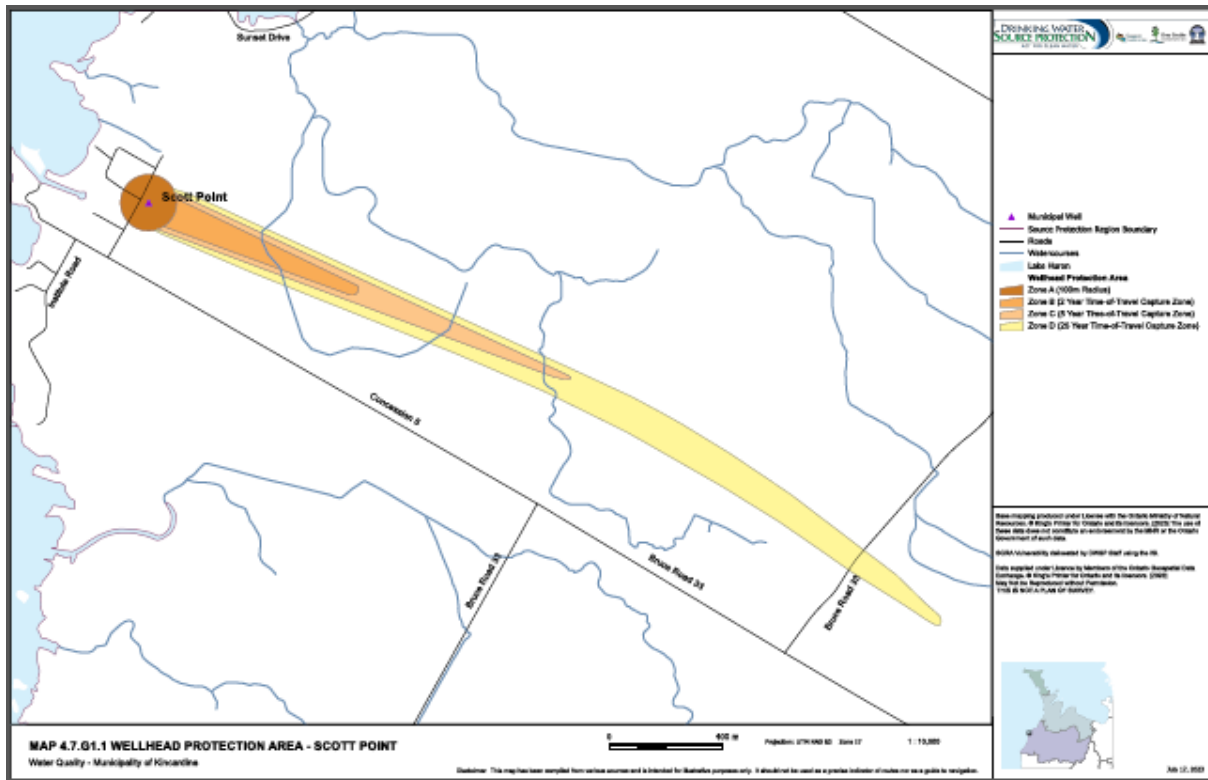
Based on the threats assessment conducted by source protection staff from Wellington Centre, it was noted that the adjustment to the WHPA-A delineation does not result in any additional significant drinking water threats than those already enumerated in the approved Source Protection Plan. Furthermore, there are no new properties affected as a result of the 6 metre shift in the WHPA-A area (the same nine properties remain in the WHPA-A).

## **3. Updated mapping for managed lands, livestock density and impervious surfaces for amended Scott Point and Minto Pines areas.**

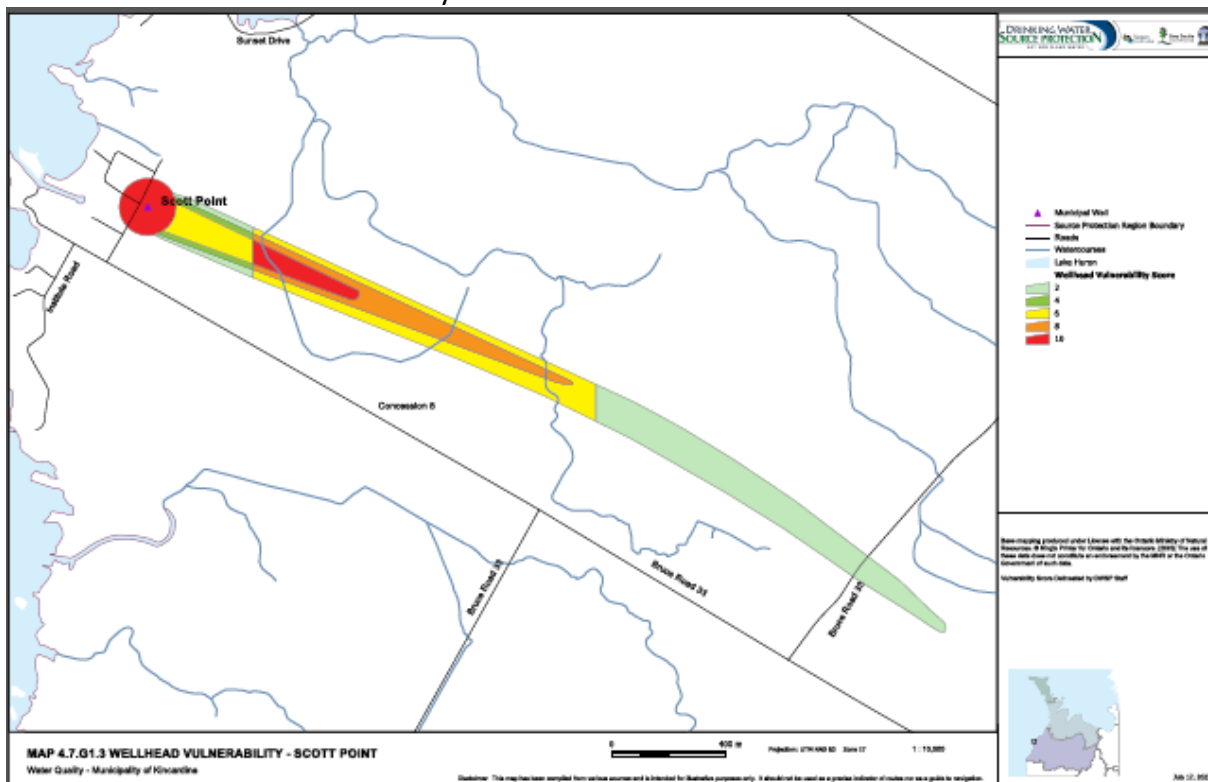
Source Protection GIS staff completed updated Source Protection Plan and Assessment Report maps based on existing source protection data layers. Staff also reviewed topographic maps in determining appropriate vulnerability scores applied to the Nutrient Units and Managed Lands maps.

The following maps have been amended to address the new Scott Point and Minto Pines well locations:

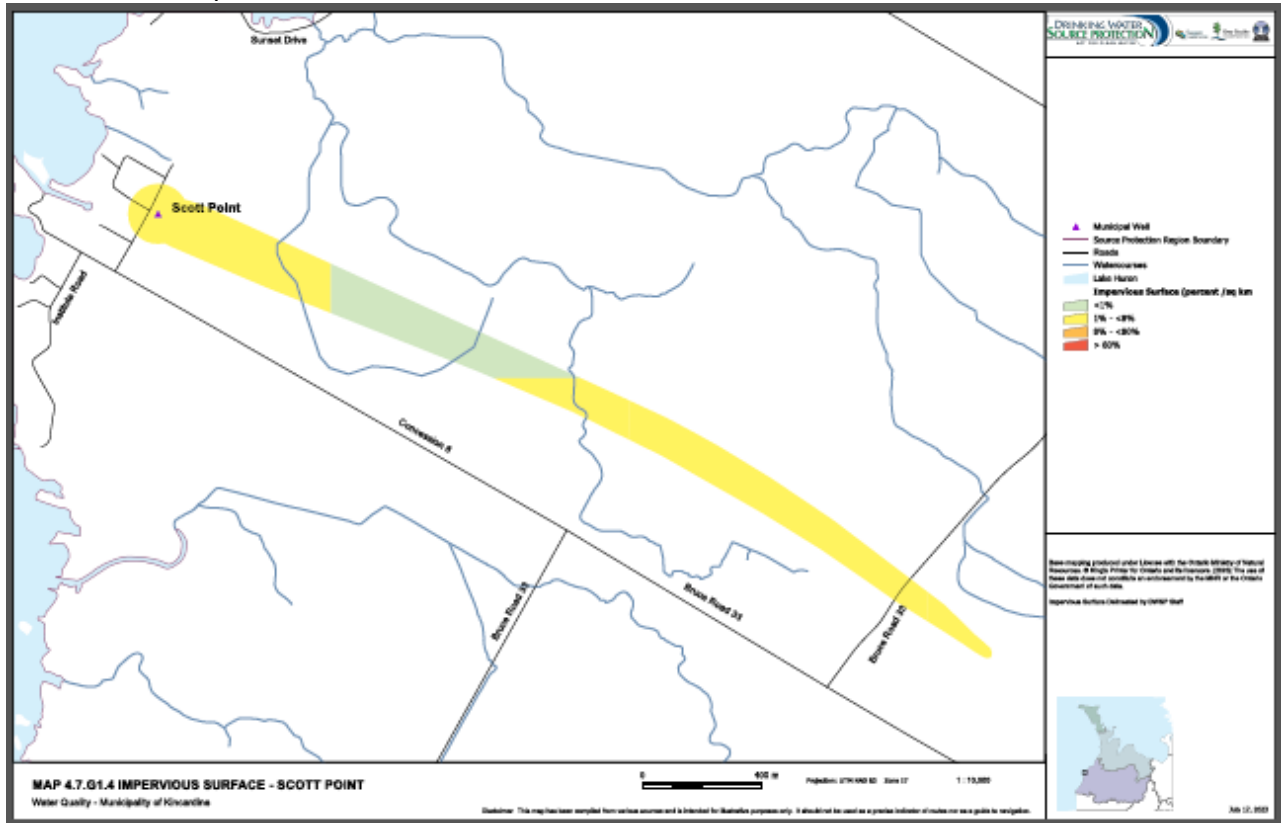
### Scott Point Wellhead Protection Area



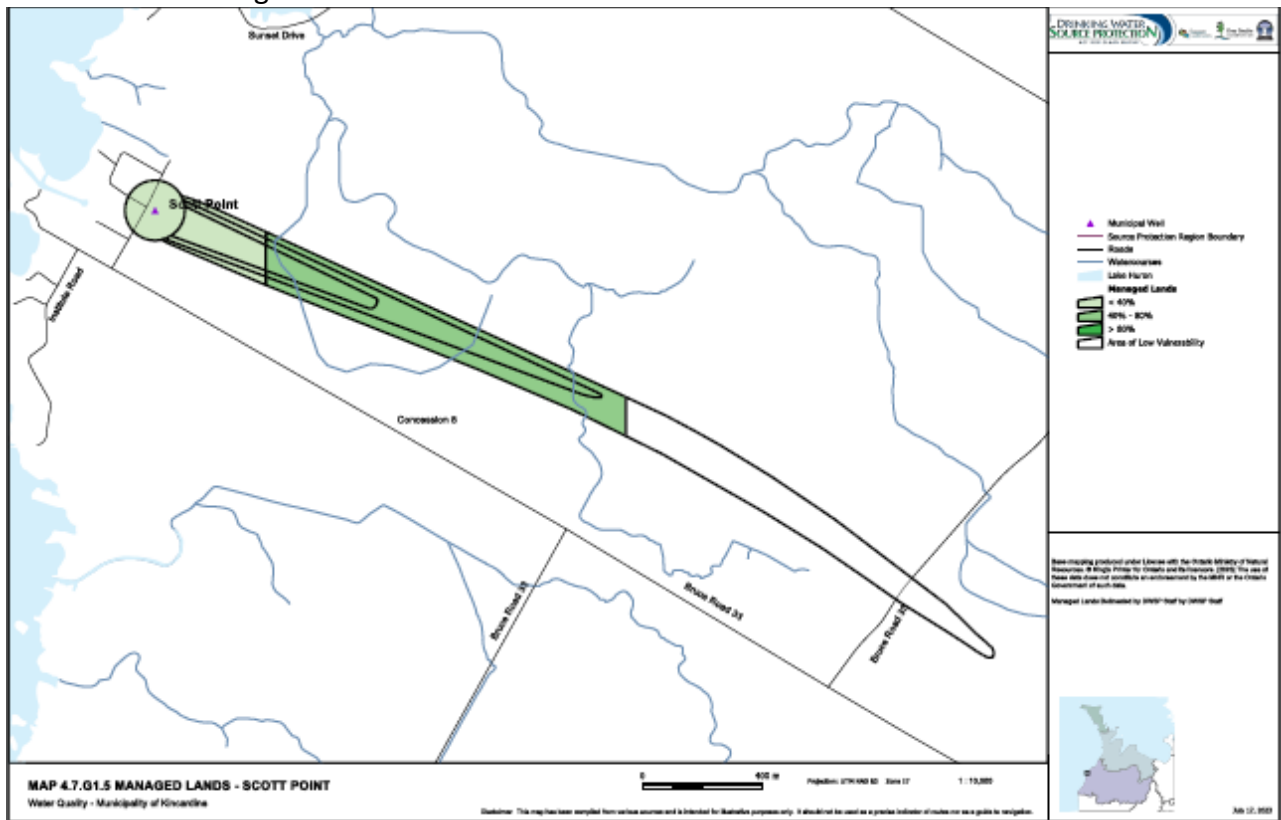
### Scott Point Wellhead Vulnerability



# Scott Point – Impervious Surface

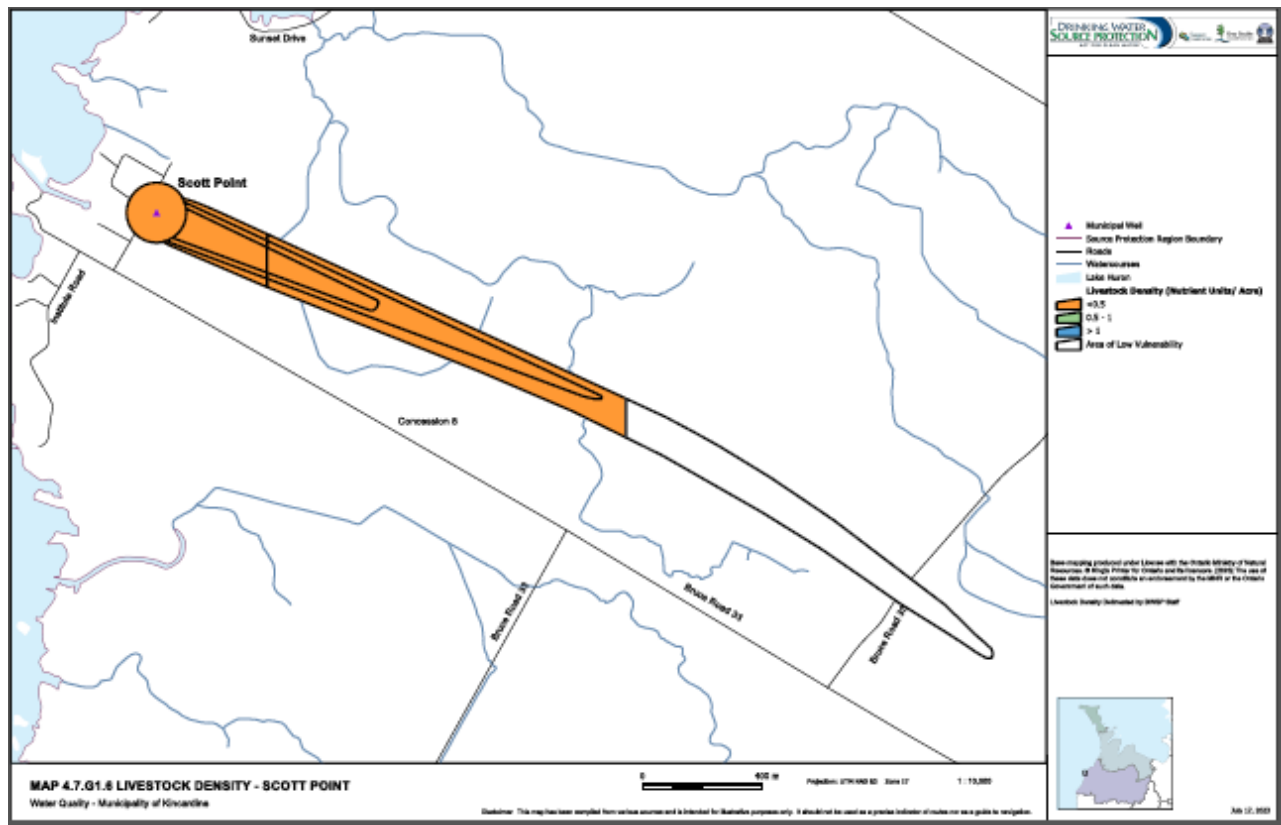


# Scott Point – Managed Lands

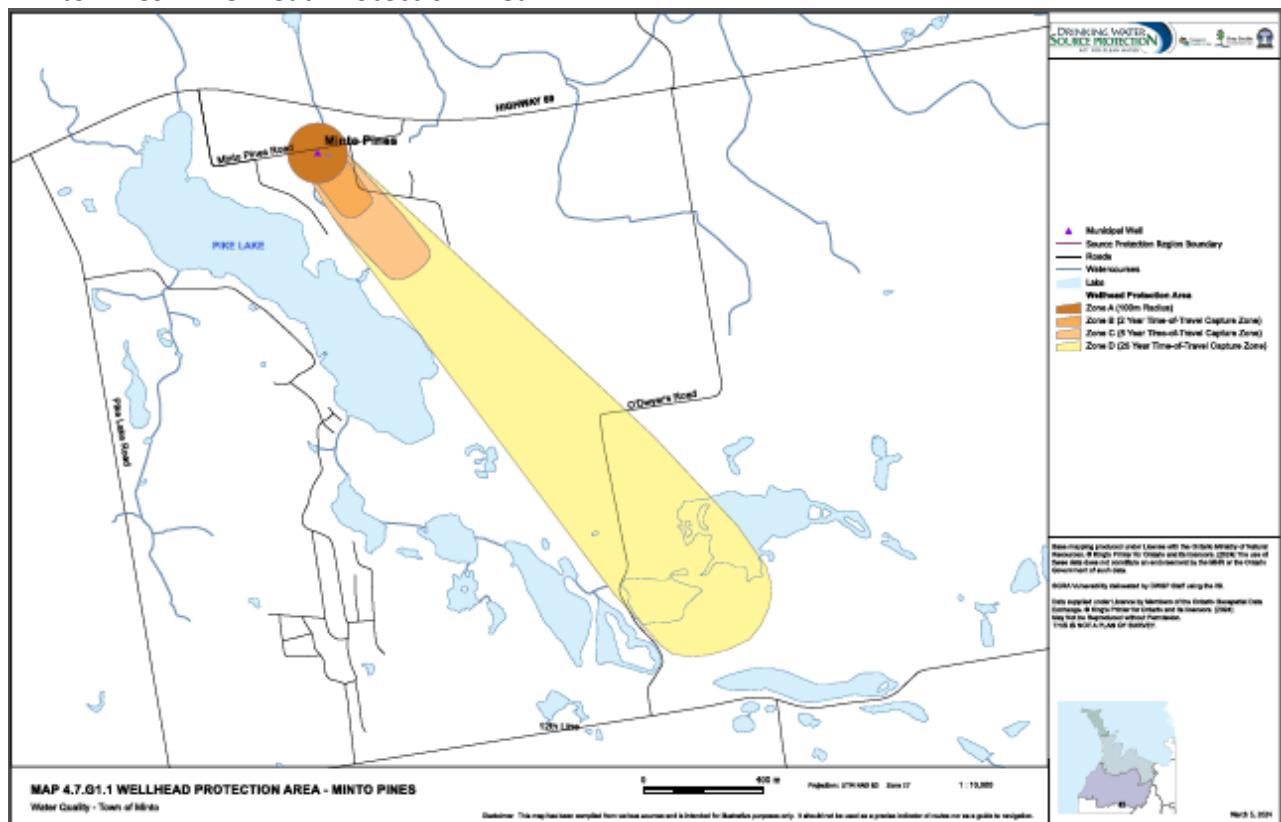




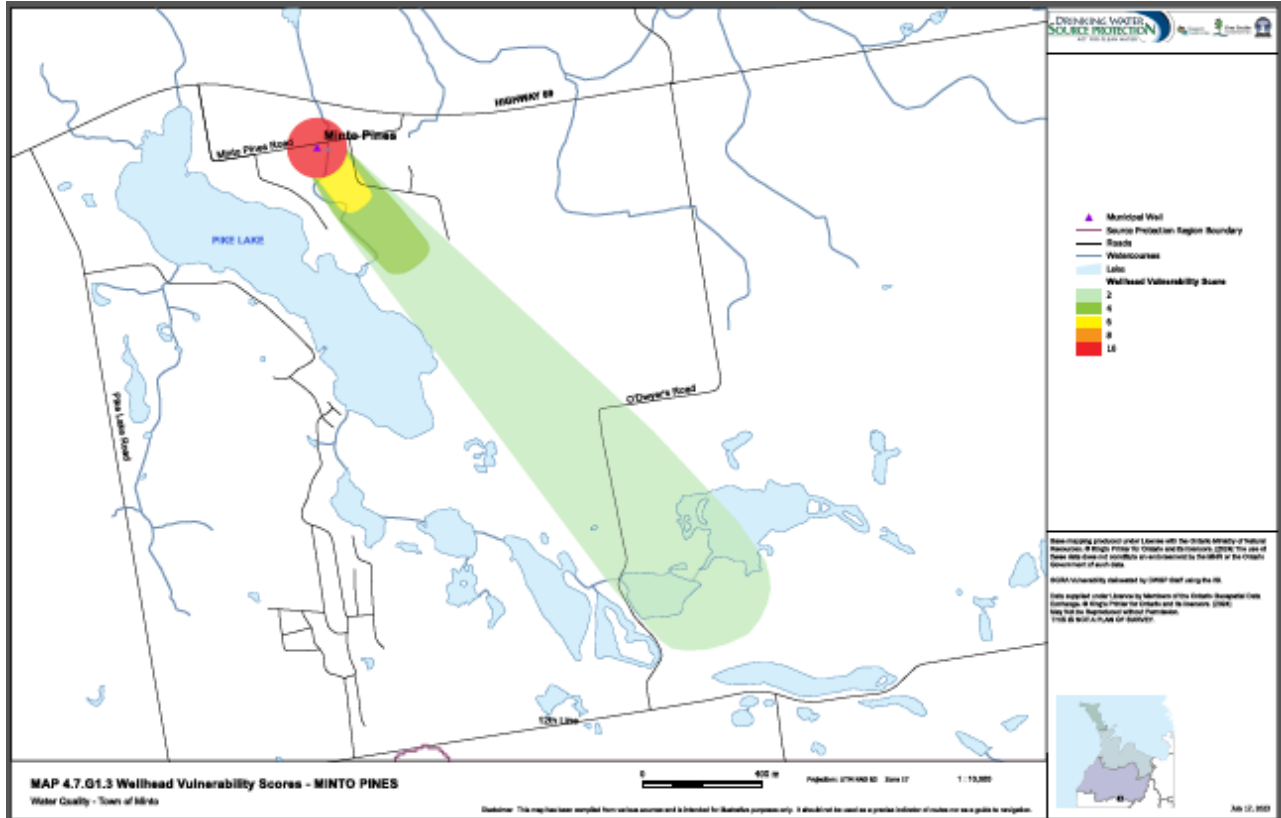
# Scott Point – Nutrient Units



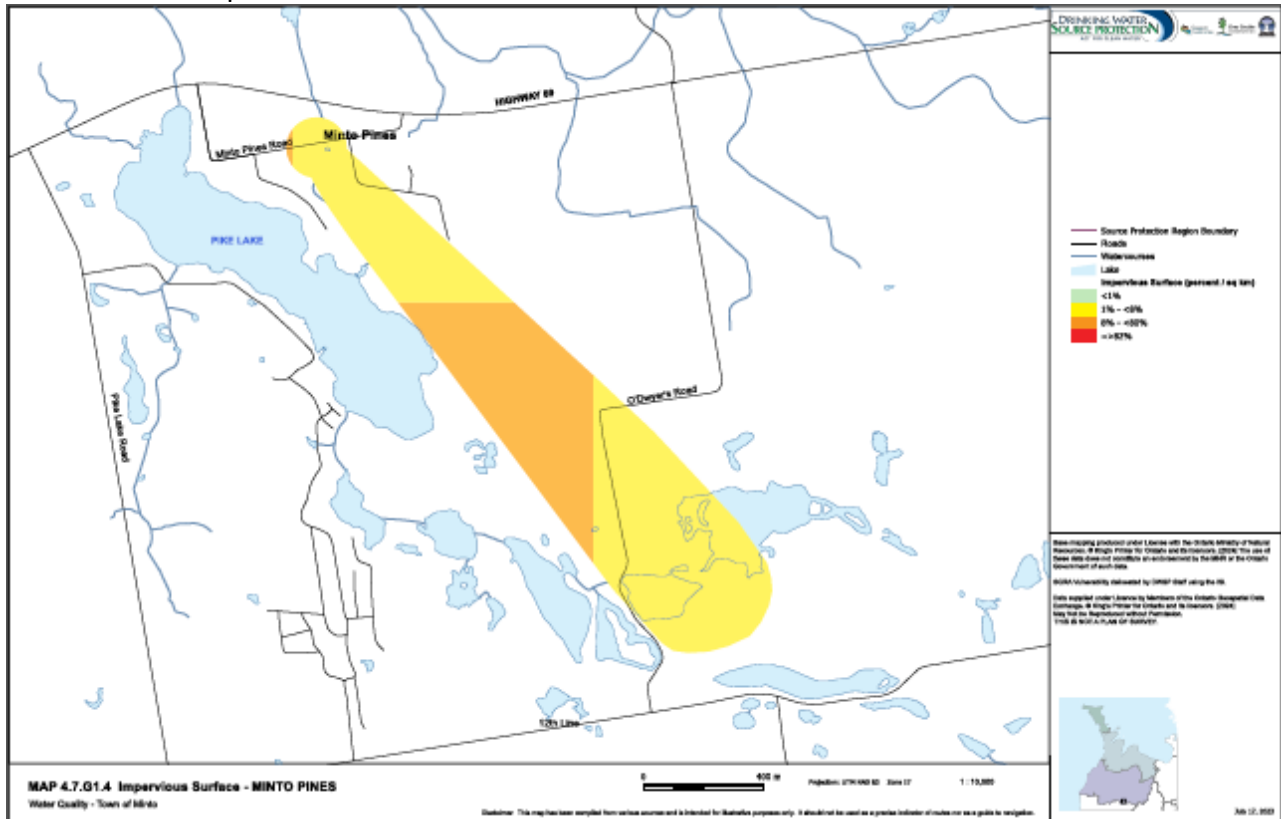
# Minto Pines – Wellhead Protection Area



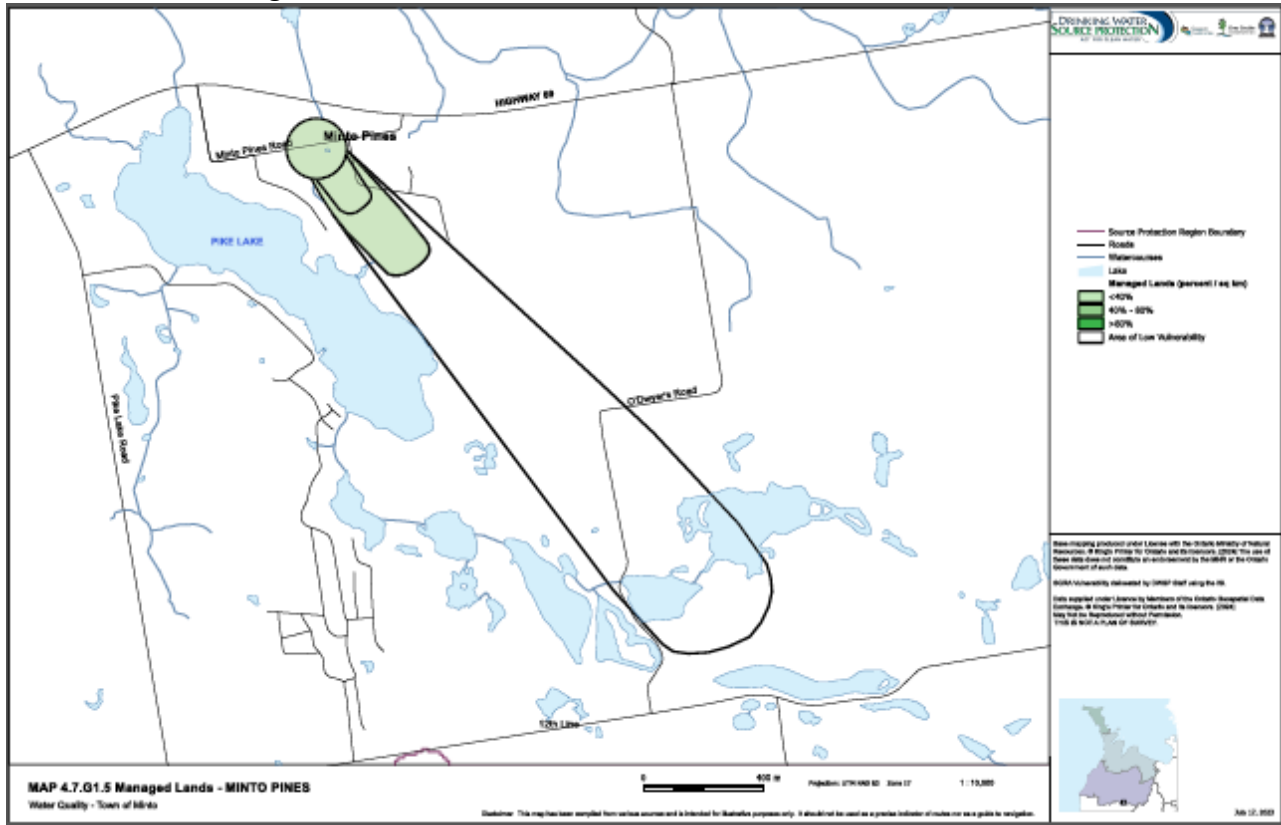
# Minto Pines – Vulnerability Scores



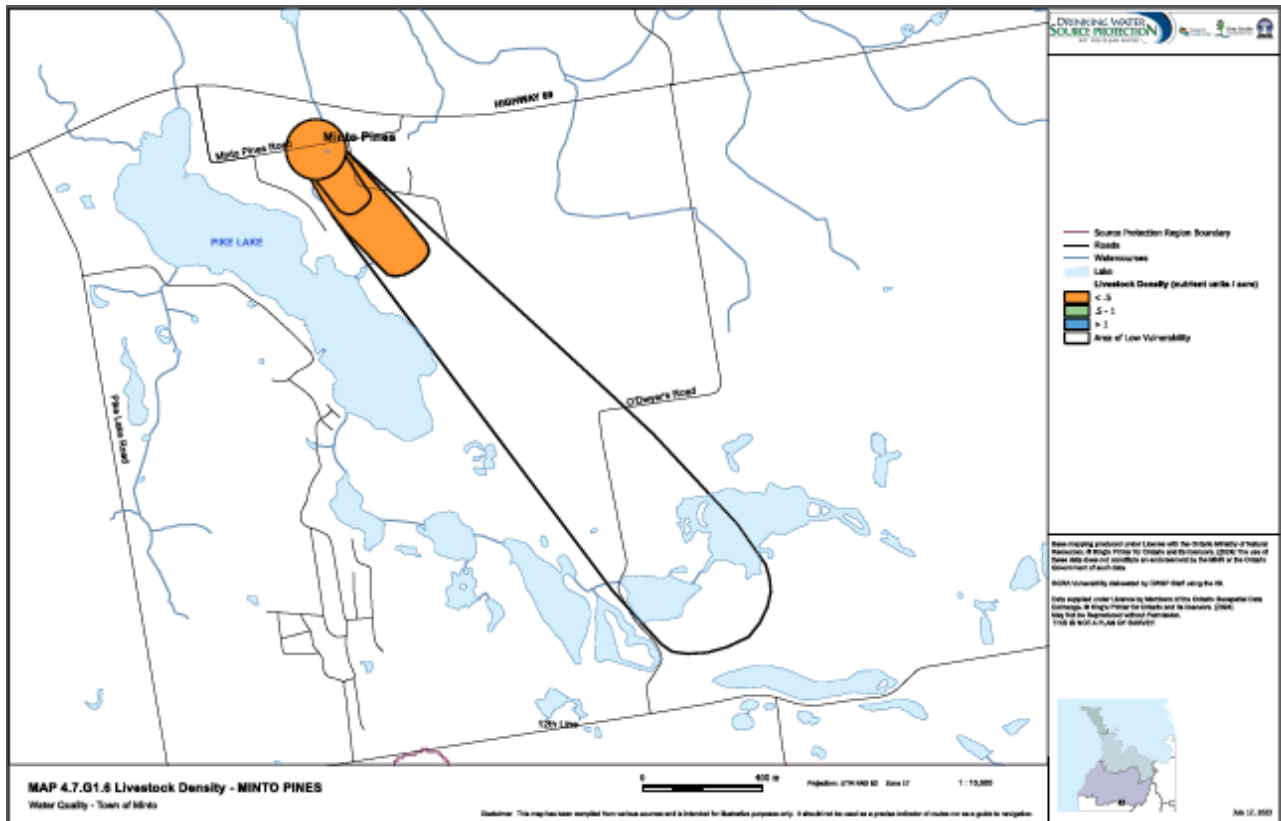
# Minto Pines – Impervious Surface



# Minto Pines – Managed Lands



# Minto Pines – Nutrient Units





#### 4. Policy 02-05 change for discretionary septic maintenance inspections – Lake Rosalind.

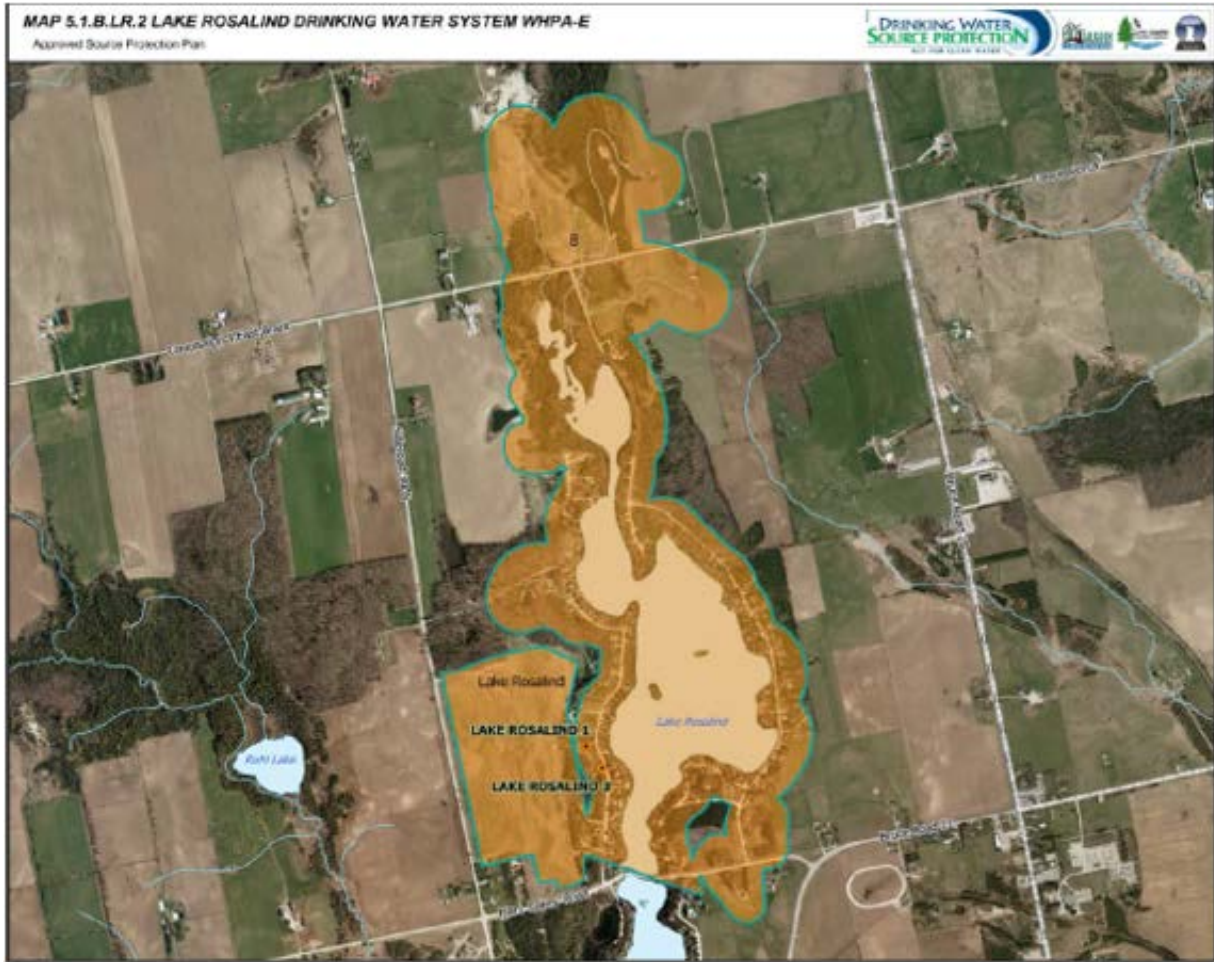
Based on discussions with the municipality and general support from the Lake Rosalind Water Quality Committee, draft policy wording has been developed to help address concerns related to septic threats around Lake Rosalind and Marl Lakes.

This policy will apply to the Municipality, who may work in collaboration with the local Risk Management Official to help prioritize high risk areas or systems that require inspection. This would be a non-mandatory policy but would give authority to implementing bodies to take appropriate action if they become aware of issues with individual septic systems. The Risk Management Official would also assist in the course of their duties to flag properties that may require an inspection.

Below is draft wording for a new non-mandatory policy to address these concerns.

POLICY TEXT ID	POLICY TEXT
<b>02-05</b>	<p data-bbox="407 642 1382 680"><b>Discretionary Maintenance Inspections – Lake Rosalind</b></p> <p data-bbox="407 743 1360 842">The policy applies in all vulnerable areas where the establishment, operation or maintenance of a septic system is or would be a low or moderate drinking water threat surrounding Lake Rosalind/Marl Lake (existing activity or future activity).</p> <p data-bbox="407 884 1414 1087">To reduce the risk to drinking water sources from septic systems or septic system holding tanks in vulnerable areas where this activity is a low or moderate threat in the Lake Rosalind/Marl Lake WHPA-E area, the local approval agency of septic systems, under the authority of the Ontario Building Code, should consider including these septic systems as part of the discretionary maintenance inspection program outlined in O.Reg. 315/10.</p> <p data-bbox="407 1129 1349 1228">In considering these discretionary inspections, priority should be given to areas where septic systems are known to fail and where older septic systems are predominant.</p> <p data-bbox="407 1270 802 1304">Monitoring policy MP-15 applies.</p>

The amended policy would apply to WHPA-E areas around Lake Rosalind/Marl Lake, where septic systems are considered a Moderate/Low risk. Below is a map of the Lake Rosalind WHPA-E area:



**5. Minor edits to source protection plan snow storage threat policies and impervious surface area map legends made under Sec. 51.**

Updated 2021 Technical Rules included changes to snow storage threat areas, resulting in minor amendments to Policy 14-01 and 14-02 Storage of Snow threats for consistency. These amendments will result in no changes to the areas affected by the snow storage threat policies or their implementation.

Snow storage located on commercial or industrial properties can be a significant drinking water threat in a wellhead protection area (WHPA) with a vulnerability score of 10. Policy tools used to address this threat include prohibition and Risk Management Plan (RMP). Snow disposal facilities are regulated under Sewage Works using a prescribed instrument.

2021 Director’s Technical Rule change for snow storage area threats:

Storage of Snow	(1) Snow stored <200m <sup>2</sup> , IPZ or WHPA score of 10
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	<p>(2) Snow stored &gt;200m<sup>2</sup> &lt;2000m<sup>2</sup>, IPZ/WHPA-E score greater than 9, and WHPA score of 10</p> <p>(3) Snow stored &gt;2000m<sup>2</sup>, IPZ/WHPA-E score greater than 8 and WHPA score of 10</p>
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**Circumstances**

- Infiltration or discharge of snowmelt from the storage of snow on commercial or industrial sites
- A storm water drainage system outfall that serves a Snow Disposal Facility.

Below are proposed policies to address these changes given the new snow storage thresholds:

POLICY TEXT ID	POLICY TEXT
<p><b>14-01</b></p>	<p><b>Prohibition</b></p> <p>The policy applies in all groundwater vulnerable areas where the storage of snow is or would be a significant drinking water threat (existing activity or future activity).</p> <p>The storage of snow shall be prohibited under the following conditions:</p> <ol style="list-style-type: none"> <li>1) a storm water drainage system outfall that serves a Snow Disposal Facility; and</li> <li>2) the area upon which snow is stored is more than 200 m<sup>2</sup>;</li> </ol> <p>Therefore, the storage of snow is designated for the purposes of s.57 of the <i>Clean Water Act</i>.</p> <p>With regards to any snow storage sites existing as of the effective date of the Source Protection Plan, the policy takes effect eight months following the effective date of the Source Protection Plan.</p> <p>Monitoring policy MP-23 applies.</p>
<p><b>14-02</b></p>	<p><b>Risk Management Plan for Snow Storage</b></p> <p>The policy applies in all vulnerable areas where the storage of snow is or would be a significant drinking water threat (existing activity or future activity).</p> <p>Where an Environmental Compliance Approval (ECA) is not required, the storage of snow may only occur in accordance with an approved Risk Management Plan and therefore, the storage of snow is designated for the purposes of s.58 of the <i>Clean Water Act</i>.</p> <p>The storage of snow may only occur in accordance with an approved Risk Management Plan under the following conditions:</p> <ol style="list-style-type: none"> <li>1) the infiltration or discharge of snowmelt from the storage of snow on a site where the predominant land use is commercial or industrial by any means other than a storm water drainage system outfall; and</li> <li>2) the area upon which snow is stored is more than 200 m<sup>2</sup>.</li> </ol> <p>The Risk Management Plan shall be renewed every five years or at the discretion of the Risk Management Official.</p>

POLICY TEXT ID	POLICY TEXT
	<p>All locations for Risk Management Plans for existing activities shall be inventoried within three years and plans established within five years of the effective date of the Source Protection Plan.</p> <p>Monitoring policies MP-24 and MP-25 apply.</p>

Also, legends for impervious surface area maps within Chapter 4 Assessment Report Maps need to be updated to reflect approved 2021 Technical Rule changes. These minor amendments support the previous Sec. 36 Plan amendments for impervious surface area calculations where salt handling and storage activities could be considered a significant risk at 30% for Wellhead Protection Areas with a vulnerability score of 10, 6% for Intake Protection Zones (IPZ) with a score of 10 and 8% for IPZ with a score of 9 or 10.

The impervious surface area map legends will be amended as follows:

Scale for WHPAs	Scale for IPZs
=>30%	=>8%
=8 - <30%	=6 - <8%
=1 - <8%	=1 - <6%
< 1%	< 1%