



**Grand River Conservation Authority  
Agenda - Source Protection Authority Meeting**

**PUBLIC**

Friday, October 25, 2019

11:00 a.m.

Auditorium

Grand River Conservation Authority

400 Clyde Road, Box 729

Cambridge, ON N1R 5W6

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**Pages**

1. **Call to Order**
2. **Certification of Quorum – 13 Members constitute a quorum (1/2 of Members appointed by participating Municipalities)**
3. **Chair's Remarks**
4. **Review of Agenda**

THAT the agenda for the Source Protection Authority Meeting be approved as circulated.
5. **Declarations of Pecuniary Interest**
6. **Minutes of the Previous Meetings**

THAT the minutes of the Source Protection Authority Meeting of September 27, 2019 be approved as circulated.
7. **Business Arising from Previous Minutes**
8. **Hearing of Delegations**
9. **Presentations**

**10. Correspondence**

- a. Lake Erie Source Protection Committee - Grand River Assessment Report and Source Protection Plan 4

THAT correspondence from the Lake Erie Source Protection Committee regarding the Grand River Assessment Report and Source Protection Plan submission to the Ministry of Environment, Conservation and Parks be received as information.

**11. 1st and 2nd Reading of By-Laws**

**12. Reports**

- a. SPA-10-19-01 - Source Protection Committee Representative Appointment 7

THAT the Grand River Source Protection Authority appoint Weylin Bomberry as a Six Nations of the Grand River representative on the Lake Erie Region Source Protection Committee.

- b. SPA-10-19-02 - Submission of the Draft Updated Grand River Source Protection Plan 8

WHEREAS the Grand River Source Protection Authority is satisfied that the Lake Erie Region Source Protection Committee's Revised Updated Source Protection Plan for the Grand River Source Protection Area contains the components required by the *Clean Water Act, 2006* and Ontario Regulation 287/07 (General Regulation); and

WHEREAS the Grand River Source Protection Authority is satisfied that pre-consultation and public consultation for the Revised Updated Grand River Source Protection Plan Area met the requirements of the *Clean Water Act, 2006* and Ontario Regulation 287/07 (General Regulation);

NOW THEREFORE BE IT RESOLVED THAT Lake Erie Region staff be directed to submit the Revised Updated Grand River Source Protection Plan to the Minister of the Environment, Conservation and Parks in accordance with Section 34 of the *Clean Water Act, 2006*, along with any comments received as part of pre-consultation and public consultation, resolutions of municipal councils submitted to the Source Protection Authority, comments from the Lake Erie Source Protection Committee, and any other comments that the Grand River Source Protection Authority wishes to make.

1. Bundled Grand River Assessment Report and Source Protection Plan

Due to the size of the attachments for this agenda item they have not been included in the agenda package. The attachments have been provided electronically to the Board and can be provided to members of the public upon request.

13. **Committee of the Whole**
14. **General Business**
15. **3rd Reading of By-Laws**
16. **Other Business**
17. **Closed Meeting**
18. **Next Meeting**  
At the call of the Chair
19. **Adjourn**

**Regrets only to:**

Office of the Chief Administrative Officer, Phone: 519-621-2763 ext. 2200

THAT the Source Protection Authority Meeting be adjourned.

October 9, 2019

Helen Jowett, Chair  
Grand River Conservation Authority  
400 Clyde Rd  
Cambridge, ON N1R 5W6

Dear Ms. Jowett:

On October 3, 2019 the Lake Erie Region Source Protection Committee passed the following resolution:

*AND THAT the Lake Erie Region Source Protection Committee releases the revised updated "Bundled" Grand River Assessment Report and Source Protection Plan to the Grand River Source Protection Authority for submission to the Ministry of the Environment, Conservation and Parks along with the municipal council resolutions endorsing the changes, and the comments as presented in this report.*

As such, this letter serves as a notice pursuant to the requirements of Ontario Regulation 287/07, which requires the Source Protection Committee to submit the Revised Updated Grand River Assessment Report and Source Protection Plan to the Grand River Source Protection Authority.

The Source Protection Authority is now tasked with forwarding the Revised Updated Assessment Report and Source Protection Plan, together with the Updated Explanatory Document, to the Ministry of the Environment, Conservation and Parks (MECP), along with any comments received as a result of the pre-consultation process and the public consultation posting, municipal council resolutions received and any comments that the Source Protection Authority wishes to make. Note that the Source Protection Authority cannot make changes to the Revised Updated Assessment Report or Source Protection Plan and does not "approve" either document.

Work under s.34 of the *Clean Water Act, 2006* (CWA) to update the Grand River Assessment Report and Source Protection Plan has been completed for proposed updates that affect Dufferin County (Township of Melancthon and Township of Amaranth), Oxford County (Community of Bright), the Region of Waterloo, Perth County (Township of Perth East), Wellington County (Township of Puslinch) and the City of Brantford. Minor administrative changes have been made to other sections of the Assessment Report and Source Protection Plan.

As part of the update process, municipalities and ministries affected by the proposed amendments were notified of the proposed changes and the opportunity for pre-consultation. Lake Erie Region received assessment report and source protection plan pre-consultation comments for consideration from the MECP and the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Comments are included in report SPA-10-19-02.

Section 34 of the CWA requires that source protection authorities obtain a municipal council resolution from each municipality affected by the amendments. Municipal Council resolutions in support of the amendments to the revised updated Grand River Assessment Report and Source Protection Plan were received on the following dates:

- Township of Amaranth – March 8, 2019
- Dufferin County – March 19, 2019
- Oxford County – April 5, 2019
- Township of Melancthon – April 5, 2019
- Perth County – April 5, 2019
- City of Brantford – April 5, 2019
- Township of Perth East – April 17, 2019
- Township of Blandford-Blenheim – May 3, 2019
- Township of Puslinch – June 3, 2019
- Wellington County – July 18, 2019
- Region of Waterloo – June 24, 2019

The Revised Updated Grand River Assessment Report and Source Protection Plan were then made available for public comment between April 8 and July 21, 2019. During this time, one public open house was held in Plattsville, Oxford County on April 15, 2019. One comment from a member of the public was received during the public consultation period (**Appendix A**).

The Source Protection program under the *Clean Water Act, 2006* is designed with continuous improvements in mind and will require updates to the Source Protection Plan and Assessment Report when new information and advanced technologies become available. The submission of the Revised Updated Assessment Report and Source Protection Plan for the Grand River Source Protection Area marks the second s. 34 update for this watershed.

The following list includes ongoing work and comments the Source Protection Committee recommend should be submitted to the MECP together with the Revised Updated Assessment Report and Plan, pre-consultation comments, municipal resolutions and public consultation comments:

#### Ongoing Work

- Guelph-Guelph/Eramosa Tier 3 Water Quantity Policy Development Study and Centre Wellington Tier 3 Water Budget and Risk Assessment
- Proposed items identified in the s.36 workplan, including:
  - Addressing Technical Rule changes
  - Assessing environmental monitoring data
  - Updating assessment report as a result of further municipal drinking water system infrastructure changes, e.g., new wells or intakes
  - Policy review and revisions to address gaps and/or implementation challenges
  - Update to Tier 3 groundwater models
  - Re-modeling of existing vulnerable areas based on new and updated information
  - Transport pathway identification and review

## Comments

- Need for long-term, multi-year sustainable provincial funding for conservation authorities for continued program oversight and support to ensure successful implementation of the Source Protection Plans and to meet the mandatory legal responsibilities of conservation authorities on an ongoing basis.
- Need for simple and easy to administer future program processes, e.g., annual progress reporting and plan update processes, to not burden conservation authorities with complex and resource intensive processes and reporting requirements.
- Need for provincial funding and support for maintenance of scientific technical tools, e.g., surface water and groundwater models, including Tier 3 models.

At this time the Source Protection Authority members may choose to attach their own comments regarding the Revised Updated Grand River Assessment Report and Source Protection Plan. The Grand River Source Protection Authority is then asked to direct Lake Erie Region staff to submit the Revised Updated Grand River Assessment Report and Source Protection Plan together with their own comments, if any, to the MECP.

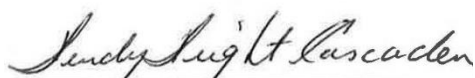
Upon release of the Revised Updated Source Protection Plan, Ontario Regulation 287/07 also requires the Source Protection Committee to provide the Source Protection Authority with the following information:

- a) a summary of any concerns that were raised by First Nations bands during the revision of the Source Protection Plan that were not resolved to the satisfaction of the bands; and
- b) a summary of any concerns that were raised by municipalities during the revision of the Proposed Source Protection Plan and that were not resolved to the satisfaction of the municipalities.

There are no outstanding concerns raised by First Nations bands or municipalities that have not been resolved to the satisfaction of the bands or the municipalities.

If you have any questions regarding this letter, or the Revised Updated Assessment Report or Source Protection Plan, please contact Ilona Feldmann at 519-621-2763 ext. 2318 or ifeldmann@grandriver.ca.

Sincerely,



Wendy Wright-Cascaden  
Chair, Lake Erie Region Source Protection Committee

cc:  
Samantha Lawson, Chief Administrative Officer, GRCA

# Grand River Source Protection Authority

**Report number:** SPA-10-19-01  
**Date:** October 25, 2019  
**To:** Members of the Grand River Source Protection Authority  
**Subject:** Source Protection Committee Representative Appointment

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## **Recommendation:**

THAT the Grand River Source Protection Authority appoint Weylin Bomberry as a Six Nations of the Grand River representative on the Lake Erie Region Source Protection Committee.

## **Report:**

The *Clean Water Act, 2006* requires the lead Source Protection Authority to appoint the members of the Source Protection Committee. For the Lake Erie Source Protection Region, the Grand River Source Protection Authority is the Lead Authority, and as such, is responsible for the appointment of the Source Protection Committee members. The Lake Erie Region Source Protection Committee is currently comprised of 24 members, three of whom are First Nations representatives (O. Reg. 288/07 s.6 (2)). With respect to First Nation appointments, band councils are responsible for selecting their own representative and the length of the term of the appointment. As outlined in O. Reg. 288/07 s. 6 (3), the Source Protection Authority shall appoint the person whose name has been provided by the council of the band.

In April 2019, Paul General, resigned from the Source Protection Committee, leaving a vacant Six Nations seat on the committee. On September 10, 2019, Six Nations of the Grand River nominated Weylin Bomberry to the committee. Mr. Bomberry is the Manager of the Six Nations Wildlife Unit.

## **Prepared by:**

Ilona Feldmann  
Source Protection Program Assistant

## **Approved by:**

Martin Keller  
Source Protection Program Manager

# Grand River Source Protection Authority

**Report number:** SPA-10-19-02  
**Date:** October 25, 2019  
**To:** Members of the Grand River Source Protection Authority  
**Subject:** Submission of the Draft Updated Grand River Source Protection Plan

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## **Recommendation:**

WHEREAS the Grand River Source Protection Authority is satisfied that the Lake Erie Region Source Protection Committee's Revised Updated Source Protection Plan for the Grand River Source Protection Area contains the components required by the *Clean Water Act, 2006* and Ontario Regulation 287/07 (General Regulation); and

WHEREAS the Grand River Source Protection Authority is satisfied that pre-consultation and public consultation for the Revised Updated Grand River Source Protection Plan Area met the requirements of the *Clean Water Act, 2006* and Ontario Regulation 287/07 (General Regulation);

NOW THEREFORE BE IT RESOLVED THAT Lake Erie Region staff be directed to submit the Revised Updated Grand River Source Protection Plan to the Minister of the Environment, Conservation and Parks in accordance with Section 34 of the *Clean Water Act, 2006*, along with any comments received as part of pre-consultation and public consultation, resolutions of municipal councils submitted to the Source Protection Authority, comments from the Lake Erie Source Protection Committee, and any other comments that the Grand River Source Protection Authority wishes to make.

## **Summary:**

Work under Section 34 of the of the *Clean Water Act, 2006* (CWA) to update the Grand River Assessment Report and Source Protection Plan has been completed for proposed updates that affect Dufferin County (Township of Melancthon and Township of Amaranth), Oxford County (Community of Bright), the Region of Waterloo, Perth County (Township of Perth East), Wellington County (Township of Puslinch) and the City of Brantford. Minor administrative changes have been made to other sections of the Assessment Report and Source Protection Plan.

Source protection technical work and policy updates, where necessary, have been completed and presented to the Lake Erie Region Source Protection Committee. A formal public consultation period was held from April 8 to July 21, 2019. All comments received, along with additional proposed revisions, were included in the Revised Updated "Bundled" Grand River Assessment Report and Source Protection Plan for consideration and presented to the Lake Erie Region Source Protection Committee for information and release to the Grand River Source Protection Authority for submission to the Ministry of the Environment, Conservation and Parks (MECP).



## **Report:**

Amendments to the Revised Updated Grand River Source Protection Plan primarily include infrastructure changes, e.g., the addition of new municipal supply wells, new and updated vulnerable area mapping and policy changes. As part of the Section 34 update process, municipalities and ministries affected by the proposed amendments were notified of the proposed changes and the opportunity for pre-consultation from February 11 to March 25, 2019. During this period, Lake Erie Region received pre-consultation comments for consideration from the MECP and the Ministry of Agriculture, Food and Rural Affairs (MAFRA). Ministry of the Environment, Conservation and Parks' comments resulted in a number of changes to the assessment report and source protection plan; MAFRA's comments resulted in only minor revisions to the source protection plan. A formal public consultation period on the proposed amendments was held from April 8 to July 21, 2019 and a public meeting was held for County of Oxford residents on April 15, 2019 in Plattsville. One comment from a member of the public was received during the public consultation period; no changes were made as a result of this comment. See **Appendix A** for comments from the MECP, MAFRA and public member.

As per O. Reg. 287/07 section 50(2), persons with properties affected by the proposed changes in the Region of Waterloo, Township of Puslinch (Wellington County), Community of Bright (Oxford County), Township of Melancthon (Dufferin County), and City of Brantford were sent notification letters highlighting the updates and public consultation process.

Section 34 of the CWA requires that source protection authorities obtain a municipal council resolution from each municipality affected by the amendments. Municipal Council resolutions in support of the amendments to the revised updated Grand River Assessment Report and Source Protection Plan were received on the following dates:

- Township of Amaranth – March 8, 2019
- Dufferin County – March 19, 2019
- Oxford County – April 5, 2019
- Township of Melancthon – April 5, 2019
- Perth County – April 5, 2019
- City of Brantford – April 5, 2019
- Township of Perth East – April 17, 2019
- Township of Blandford-Blenheim – May 3, 2019
- Township of Puslinch – June 3, 2019
- Wellington County – July 18, 2019
- Region of Waterloo – June 24, 2019

Following the completion of the revisions of the Revised Updated Grand River Source Protection Plan, the Grand River Source Protection Authority has the responsibility to submit the Revised Updated Plan to the MECP. As with previous submissions, the Grand River Source Protection Authority does not approve these documents but may include with the submission any comments it wishes to make, along with any received pre-consultation comments, municipal resolutions and public consultation comments.

Lake Erie Region staff are recommending that the list of Outstanding Work and Comments provided by the Lake Erie Region Source Protection Committee in its correspondence to Helen Jowett, Chair, Grand River Source Protection Authority be included as part of the submission to the MECP. If Members choose to proceed with the submission of the Revised Updated Grand River Source Protection Plan, as recommended in this report, the document will be submitted by early November, 2019.

**Prepared by:**

Ilona Feldmann  
Source Protection Program Assistant

**Approved by:**

Martin Keller  
Source Protection Program Manager

Appendix A

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
#	Comment Source	Comment Period	AR Section	Comment	How Comment was Addressed
1	MECP	Pre-Consultation	Various	<p>At this time, the province has not completed a thorough review of the proposed technical work and associated amendments given the lack of technical information to support the Ministry’s assessment. This review will be completed when the regional update is submitted for approval with the supporting technical assessments, which may result in a delay of the final approval. Specifically, technical reports are required for the following:</p> <ul style="list-style-type: none"> <li>○ Dufferin County (Section 5): if a WHPA was delineated for the addition of the municipal well (PW8).</li> <li>○ Region of Waterloo (Section 8): <ul style="list-style-type: none"> <li>▪ Cambridge Wellfields: Hespeler, Pinebush, Blair Road, Clemens Mill, Elgin Street, Middleton Street, Shades Mill, Fountain Street, and Willard. Additionally, if WHPAs were delineated for the replacement wells (i.e. P15A and P10B);</li> </ul> </li> </ul>	A copy of the requested technical reports were made available to the MECP on June 3, 2019.

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
#	Comment Source	Comment Period	AR Section	Comment	How Comment was Addressed
				<ul style="list-style-type: none"> <li>▪ Kitchener wellfields: Mannheim East, West, ASR and Peaking, Lancaster, Greenbrook, Strange Street, Parkway, Strasburg, Pompeii, Woolner and Wilmot Centre;</li> <li>▪ Waterloo Wellfields: Erb Street, William Street, and Waterloo North; and</li> <li>▪ Rural Wellfields: Ayr, Branchton Meadows, Elmira, Foxboro Green, Heidelberg, Linwood, Maryhill, New Dundee, New Hamburg, Roseville, St. Clements, Wellesley.</li> </ul> <ul style="list-style-type: none"> <li>○ Region of Halton (Section 9): If a WHPA was delineated for the addition of 4<sup>th</sup> Line Well B.</li> <li>○ County of Oxford (Section 11): Well 4A and Well 5</li> </ul>	
2	MECP	Pre-Consultation	Section 8 and Section 19	The draft 2019 technical work indicates that “future (2031) Allocated Rates applied in the Tier 3 Assessment and the planned rates (to 2051) in the Water Supply Master Plan” were used to delineate. While using future rates is the	The quote provided in MECP’s comments does not contain the entire sentence that was provided in the Assessment Report. The full statement is as follows:  “Modeled pumping rates used to generate the WHPAs were established in consideration of

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
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				<p>most protective approach, please provide additional rationale for using the furthest forecasted future rates for this assessment and context to clarify difference in planned/allocated pumping rates from current pumping rates. Additionally, please consider any implications on where policies apply when using these future projections. For example, to what extent did the future rates influence the delineation of the WHPAs? Have more significant threats (counts or activities) been identified?</p>	<p>future (2031) Allocated Rates applied in the Tier 3 Assessment and the planned rates (to 2051) in the Water Supply Master Plan.”</p> <p>The key word that was omitted in MECP’s comments is “considered”. The Region’s approach to determining pumping rates was based on a number of operational considerations and improved knowledge to the Region’s groundwater supplies arising from the Tier 3 Assessment. It was not designed to meet the 2051 demand, although the total of the pumping rates used for delineation is similar to that needed to meet the 2051 demand. Finally, the Region’s Water Supply Master Plan did not identify well-specific pumping rates but rather used available well capacities to indicate that demand up to 2051 could be met.</p> <p>As noted in MECP’s early comments in this letter, MECP had not received nor reviewed the technical study reports that were generated and provided the technical details needed to assist in interpreting Waterloo Region’s approach to delineation of Well Head Protection Areas (WHPAs). Specifically, Appendix B of the report Region of Waterloo Well Head Protection Delineation Study (Matrix 2017) provides details</p>

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
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					<p>of the approach taken to establish pumping rates. The approach taken addressed several challenges including:</p> <ul style="list-style-type: none"> <li>• Several of the existing operating wells were not needed to meet the 2031 demand as determined in the Tier 3 Assessment including several Planned systems in the Region’s 2015 Master Water Supply Plan that were not currently operating. Pumping rates for these wells were established so well head protection areas could be delineated.</li> <li>• The results of the Tier 3 Assessment provided new insights into the interaction and competition of water amongst the wells in the Integrated Urban System (IUS) for Cambridge, Kitchener and Waterloo. Specifically, operation of wells in one area interferes with and changes where water flows to adjacent and/or up gradient wells resulting in well head protection areas that change with changes in pumping.</li> <li>• The Region frequently takes well systems off-line for extended periods of time for upgrades. For instance the Strange Street wells were taken off line in August 2019 and will be off line for 2 years while upgrades to</li> </ul>

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
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					<p>the treatment plant are undertaken to address new iron and manganese Ontario Drinking Water Standards. Also Greenbrook was off-line for 2 years for treatment upgrades to address 1,4-dioxane contamination between 2004 and 2006. To address these issues and because changes in well operation affect adjacent wells, the Region undertook an assessment of whether the existing supply well pumping rates could be increased to offset these losses for a two-year period. The two-year shut down rates were run through the Tier 3 models to assess whether the Safe Additional Available Water thresholds established under the Clean Water Act could be met. Through a series of iterative model runs, the rates were optimized and these were the rates used to delineate well head protection areas. Region staff decided that although the combined rates established in this process were higher than needed to meet the 2031 demand, these rates reflected the way the Region operated the IUS and were appropriate for delineation of well head protection areas.</p> <ul style="list-style-type: none"> <li>• The combined rate was approximately 12 percent lower than those used in the original</li> </ul>

<b>Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments</b>					
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					<p>Assessment Report.</p> <p>Some of the above information was provided in the proposed Assessment Report; however, further clarification is recommended and the draft wording expanded to better explain the approach to determination of pumping rates.</p> <p>Not all pumping rates were increased so the impact of changes to pumping rates varied. More importantly, the conceptual hydrogeology and most of the parameters used to calibrate the numerical models changed due to the comprehensive update to the models. The changes to the models, particularly in Cambridge, resulting in much larger well head protection areas. Obviously, where the protection areas were larger, they are more likely to have more significant threats particularly where Issue Contributing Areas were delineated.</p>
3	MECP	Pre-Consultation	Section 8	Please explain how the WHPA delineation integrated the results between the base case and the uncertainty cases.	Results of forward and backward particle tracking for each of the base and uncertainty cases were combined and an “envelope” created around all of the particle tracking simulations. This protection area envelope was then carried forward into the vulnerability assessment and scoring process. A sentence describing this



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					process will be added to the assessment report.
4	MECP	Pre-Consultation	All water quality sections	For pathogen threats, please consider removing references to WHPA-C/D. Pathogen threats can not be identified in these areas.	Removed reference to pathogen threats for WHPA-C/D throughout assessment report.
5	MECP	Pre-Consultation	All water quality sections	The delineation of Issue Contributing Areas (ICA) depends on Wellhead Protection Area (WHPA) delineations. Given that there are a number of reports we still need to review, please note that if there are any technical concerns with WHPA delineations, the ICAs will need to be reviewed again.	Requested reports were given to the MECP on June 3, 2019.
6	MECP	Pre-Consultation	Section 5	Please clarify if conditions resulting from past or historical activities were identified within the PW7 <u>and</u> PW8 WHPAs. Currently the text only refers to PW7 and the WHPAs are delineated for both wells (section 5.4.4).	Assessment report updated in include that there are no additional conditions for PW8.
7	MECP	Pre-Consultation	Section 5	The Shelburne water supply issues evaluation (section 5.4.5) only provides information on the main well PW7. Please update this section with the relevant information for back-up well	Assessment report was updated to include text on issues evaluation for PW8. No new issues identified.

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				PW8.	
8	MECP	Pre-Consultation	Section 7	Please confirm that the Intake Protection Zone (IPZ) delineation methodology described in Chapter 3 (Water Quality Threats Assessment Methodology – submitted in a previous s.34 amendment for Grey/Brant/Hamilton) is the same IPZ methodology removed on page 37.	Assessment report updated with text to confirm that the methodology used to delineate the IPZ in the City of Guelph is the same as described as in the Methodology section.
9	MECP	Pre-Consultation	Section 7	Please note that once studies on potential declining concentrations of nitrate (Carter Wells) and TCE (Emma wells) are completed, the Ministry will need to review the water quality issues evaluations.	Noted.
10	MECP	Pre-Consultation	Section 7	For the Membro Well, it is currently unclear why trichloroethylene (TCE) is identified as an Issue under Technical Rule 114. The recent data indicates a declining TCE trend with concentrations less than the Maximum Acceptable Concentration (MAC) and the well is not operating at full capacity. Given that TCE activities are significant threats up to and including the WHPA-C and the TCE issue, likely from past activities, are already significant threats under the scoring	Concerns regarding the water quality in the Membro well remain as it has been demonstrated on several occasions where concentrations of TCE tend to rise as there is an increase in the pumping rate at the Membro well. The declining trend is due to the lower pumping rates in recent years for the well. The City of Guelph plans to increase the pumping rate at the Membro Well using a new Replacement Well at the same location. Until the water quality trend is confirmed at higher pumping rates, the most conservative approach is to continue TCE as a

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				approach, please clarify what an ICA would additionally do to help improve the water quality in the well.	drinking water issue in the well. Once the City has more monitoring data at higher pumping rates, the TCE issue can be reconsidered.  The ability to identify a municipal drinking water supply as having an issue is prescribed in the Technical Rules. The City has followed the rules and rationale to designate TCE as a drinking water issue in the Membro well and, as such, have defined an ICA for TCE for the well.
11	MECP	Pre-Consultation	Section 8	For the vulnerability assessment conditions section (page 60) please update the text to reflect the March 2017 updates to the Technical Rules.	Completed.
12	MECP	Pre-Consultation	Section 8	Table 8-11 (page 76) for the identification of quality threats for Erb Street, the WHPA qualifiers under the vulnerable area column are missing. Please update with the correct information.	Completed.
13	MECP	Pre-Consultation	Section 8	For the Mannheim West WHPA-E map (Map 8-36, page 118), the WHPA-E appears to have slightly changed from the approved assessment report. Please clarify if this was due to the removal of well K22A or changes in the hydrological data.	Yes, removal of well K22A changed the delineation of WHPA-E for the Mannheim West well field. No additional hydrologic assessment was completed as part of the update.

<b>Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments</b>					
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14	MECP	Pre-Consultation	Section 8	<p>TCE trends are depicted for the Kitchener Parkway Supply Wells and Common Reservoir (Figure 8-11, page 177) and Cambridge well G9 (Figure 8-11, page 317). The TCE concentrations do not appear to have an increasing trend in either figure and, other than a single occurrence for Kitchener, are consistently below the Ontario Drinking Water Standard (ODWS) for almost 20 years. It is unclear how an ICA for TCE is justified given the current data. Please provide additional information to explain the TCE ICA. Also, please consider how an ICA would further manage TCE concerns given that DNAPL activities are already a significant threat up to WHPA-C (regardless of the scores) and there is no SDWT condition site.</p>	<p>For the Parkway wells, a trend of increasing TCE concentrations has been occurring in K32 since approximately 2013 and there are two instances where isolated samples were above the trend and above half of the Ontario Drinking Water Standard (2.5 ug/L). As MECP staff have directed the Region to operate the wells to try to keep the overall TCE concentration at half the Ontario Drinking Water Standard, a TCE drinking water issue was identified for well K32.</p> <p>For G9, there appears to be a correlation between pumping rates and TCE concentrations in the supply well. For instance, samples from May 2008 and May 2011 show lower levels of TCE and correlate to time periods when the pumping from the production well was reduced. The apparent increasing trend of TCE concentration up to 3 µg/L between May 2008 and December 2009 correlates to a time period of sustained well pumping. If G9 is pumped at higher and more continuous rates in the future, this could result in higher TCE concentrations at this water source. Further, the source(s) of TCE to well G9 are not known and the fractured rock aquifers in the area, like all fractured rock hydrogeologic regimes, are difficult to characterize with respect to groundwater flow and contaminant transport.</p>

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					Based on all of these factors, a TCE issue was identified for this well, consistent with that in the approved Assessment Report.
15	MECP	Pre-Consultation	Section 8	<p>For significant conditions, the assessment report indicates that the sites were identified through different sources of information including the MECP Guelph District Office. For the Ministry’s information, could you clarify if the following changes to significant conditions have been discussed with the MECP District Office and the outcome of this discussion (if any):</p> <ul style="list-style-type: none"> <li>• Two (2) additional SDWTs conditions added to William Street Wellfield (page 100);</li> <li>• One (1) significant condition was added due to the new vulnerability scores of the Hespeler wellfield (page 252);</li> <li>• One (1) additional significant condition was added due to the new information on the Pinebush site (page 259);</li> <li>• One (1) new significant condition was</li> </ul>	<p>Region staff met with MECP Guelph District Office staff on May 29, 2019 as part of our bi-monthly conditions meetings. The proposed new condition sites were presented but District Office staff did not review the underlying circumstances to confirm they support adding these sites. A further meeting will be scheduled in mid-September 2019 to review the details.</p> <p>It is important to note that the above list is incorrect as there is no site identified for Shades Mill and there are two additional sites identified for Middleton making a total of 8 new condition sites.</p> <p>*As per information received on October 7, 2019: The Guelph District Office has confirmed to the Region of Waterloo that they are aware of eight (8) new proposed Condition Sites (G6 Clemens Mill, Pinebush, Middleton St, Hespeler H3/H3A, Blair, and William St) and do not have concerns as it related to these sites meeting the Technical Rules at this time.</p>

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				<p>added due to the new vulnerability scores of the Clemens Mill wellfield (page 262);</p> <ul style="list-style-type: none"> <li>• One (1) significant condition was added for Shades Mills (page 283); and</li> <li>• One (1) new significant condition was added due to new vulnerability scores of the Blair Road wellfield (page 313).</li> </ul>	
16	MECP	Pre-Consultation	Section 8	For the Pompeii Well (section 8.3.4) one (1) significant condition has been removed; however, the Regional Municipality of Waterloo (RMOW) excel file # 2977091 does not include this site. Please provide the necessary information to support the removal.	The table in the Region’s excel file No. 2977091 refers to the removal of a site from the river wells which should have read Pompeii wells. This will be changed in the Region’s document.
17	MECP	Pre-Consultation	Section 8	Although the Blair Road Well WHPA-E section (section 8.6.1, page 291) indicates it was delineated similar to other WHPA-E delineations, it is recommended to provide a brief description of how this zone was delineated and scored for clarity.	Additional wording added in the Assessment Report for clarity.
18	MECP	Pre-	Section 8	For the Branchton Meadows wells, it is currently unclear from the current	Sodium has not been identified as an Issue under Technical Rule 114. Thus, no data/discussions

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		Consultation		description on Issues (page 366) whether sodium has been identified as an issue under Technical Rule 114. If it has, please provide the required data and information to show how Rule 114 has been met.	were included in the Issues Assessment document. For clarification, a statement indicating sodium concentrations are currently elevated (approximately 90 mg/L) with an increasing trend, but are not predicted to exceed the ODW-AO of 200 mg/L within 10 years and as such are not classified as an Issue will be added to the Region of Waterloo Issue rational document.
19	MECP	Pre-Consultation	Section 8	Please verify and explain why, for the Branchton Meadows well ICA map (Map 8-171, page 380), a portion of the WHPA-A has not been captured within the ICA given that the ICA was delineated for a 25-year Time-of-Travel (TOT). The WHPA-A has the highest vulnerability score, regardless of the TOT.	This was an error. The map has been updated with the ICA including the WHPA A 100 m zone.
20	MECP	Pre-Consultation	Section 11	For the identification of quality threats in the Bright Supply WHPAs (Table 11-6, page 41), the table indicated that the WHPA-C has score of 8 and 6, while the corresponding map (Map 11-6, page 20) shows WHPA-C scores of 8, 6 and 2. Please verify the data and revise the map and/or table as required.	Data has been verified.
21	MECP	Pre-	Section 16	For the Dunnville Water Treatment Plant, Maps 16-4 (page 10), 16-5 (page 11) and	Managed lands, livestock density, and impervious surfaces delineated on the water portions of the

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		Consultation		16-6 (page 12) show managed lands, livestock density and impervious areas delineated on the water portions of IPZs. For clarity, it is recommended to uncolour these portions of the IPZs on the associated maps as these activities do not occur on water.	IPZ for Dunnville Water Treatment Plant have been removed.
22	MECP	Pre-Consultation	Tier 3 Sections	<p>The summaries of the Tier 3 Water Budgets in the assessment report sections for Waterloo (Section 8), Guelph (Section 19), Whiteman’s Creek (Section 21) and Orangeville and Amaranth (Section 22) are currently written for a technical audience. In particular, the Waterloo Tier 3 section discussion of the risk of water quantity stress from the future (2031) is particularly challenging for a generalist to follow. These sections should be revised to better describe the results to a layman reader rather than a step-wise summary of the Tier 3 process.</p> <p>While the water budget sections use language that is compliant with the source protection water quantity framework, it could do more to draw</p>	The Tier 3 sections of the Assessment Report were revised to reflect these comments.



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				linkages to the purpose of the studies for the readers and communicate technical results in an accessible fashion.	
23	MECP	Pre-Consultation	Tier 3 Sections	<p>We encourage a review and revision of these sections to use more plain language (e.g. existing/future) over language specific to the framework (e.g. allocated), a clearer summary of the work completed and its conclusions, as well as a consistency in technical terms used (i.e. Guelph section uses WHPA-Q whereas the other sections use WHPA-Q1/Q2) which will help give the readers some consistency in terms when comparing to the water quantity policies.</p> <p>Tier 3 water quantity wellhead protection areas (WHPA-Qs) be accompanied with the associated water quantity policies in order for the amendments to be aligned and considered complete. We realize this will require making some adjustments to your recently updated summary of proposed amendments and associated timelines, however this is necessary to avoid the problems of uncertainty and creating a gap of information among the</p>	The Tier 3 sections of the Assessment Report were revised to reflect these comments.

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				public and businesses located in a WHPA-Q or which will be affected by the related policies.	
24	MECP	Pre-Consultation	Section 8	The Region of Waterloo approved a resolution to decommission 14 wells by January 2023 and the updated assessment report removed the wellhead protection area (WHPA) delineations for each of these wells. However, for the wells with an active drinking water license (i.e. WM1, WM2, WM3, WM4, C3, C4, C5, C6, and P6) and in use prior to the amendments under section 34 being approved by the Minister, the WHPA delineations must stay in the assessment report with a note indicating the timeframe for decommissioning each well. Although this section indicated that the wells were excluded as source protection plan policies will no longer be applicable in these areas, the assessment report also indicated that the existing drinking water systems will be operated as necessary until the wells are decommissioned. The plan for decommission can be further explained in the assessment report, in addition to	The most recent May 18, 2018 Drinking Water Works Permit for West Montrose and Conestoga does not include reference to wells WM1, 2, 3 or 4 as these wells have been decommissioned and removed from the system. Further an application for an amendment to the Drinking Water Works Permit to remove P6 from the permit was submitted to MECP on December 14, 2017 as this well has been decommissioned. Therefore, protection areas for these wells will not be included in the Assessment Report. Protection areas for the four Conestoga wells will be added back into the Assessment Report.

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				indicating that notification will occur when the delineation and plan policies are no longer in place. An administrative amendment can be applied under section 51 of O.Reg.287/07 to remove the applicable wells and update the assessment report and plan as necessary following decommissioning.	
25	MECP	Pre-Consultation	Section 8	The Issue Contributing Areas within the region were set at the 25-year time of travel using pumping rates consistent with the 2051 average day rate. As an Issue represents existing conditions, it would be more appropriate to use <u>current</u> pumping rates to assess the area that may be contributing to an existing Issue. Please provide additional rationale for the approach using future pumping rates to delineate the ICAs.	<p>A response to the Region’s approach to establishing pumping rates for delineating well head protection areas was included in responses to MECP’s May 2019 comments. In that response, the Region clarified that it did not use 2051 pumping rates to delineate well head protection areas.</p> <p>The use of future pumping rates was used as the basis for delineating Issue Contributing Areas in the approved Assessment Report. The rationale for using this approach in the original and this report is as follows:</p> <ul style="list-style-type: none"> <li>• Sources of non-point contaminants such as nitrate and sodium/chloride are known to extend beyond the 25 year time of travel delineated using existing pumping rates. Increasing the areas where these threats can be identified as significant will improve the</li> </ul>

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					<p>likelihood that more of the contaminant sources can be mitigated which supports the pre-cautionary principle of the Clean Water Act. This is particularly important for sodium and chloride issues as these chemicals are applied to roads and parking lots to ensure public safety but are applied at excessive rates due to liability concerns. Because of these concerns, it is the Region’s implementation experience that only very minor mitigation will be realized from each individual risk management plan so a higher number of properties are needed to reach a critical “mass” of properties to potentially reduce concentrations at the wells.</p> <ul style="list-style-type: none"> <li>• Municipalities are required to update their official plans to be consistent with the approved Source Protection Plan and Assessment Report. These plans direct where and how future development should occur and so will protect municipal water supplies from the impacts of future development. If Issue Contributing Areas were delineated with existing pumping rates, future development outside of these areas would not be required to implement mitigation measures to protect drinking water sources needed to supply this new development thereby defeating the purpose of updating</li> </ul>

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					<p>these plans.</p> <ul style="list-style-type: none"> <li>• As noted in the response to MECP’s May 2019 comments, the Region frequently shuts down water supply wells for maintenance and upgrades resulting in wells that could be off-line for up to two years. The effect of this operating approach is that areas that contribute water to the supply wells change such that a water well pumping at an existing rate would not be obtaining water from within it’s “narrowly defined” well head protection area depending on whether other nearby wells are operating. Consequently, expanding the areas for which activities can be significant increases the certainty that the well is actually capturing water from within the delineated protection area and Issue Contributing Area.</li> <li>• It is anticipated that it will take more than ten years and possibly up to 20 years for Region staff to complete negotiations of risk management plans for the total number of sodium and chloride threats identified in the Assessment Report. As this time frame is well beyond the present, it is expected that increased pumping beyond the current rates will be occurring which supports the use of</li> </ul>

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					<p>future pumping rates.</p> <p>Using future pumping rates and the Region’s approach to setting pumping rates for delineating well head protection areas and issue contributing areas provides the best likelihood that mitigation measures can be implemented at the right location and right number of properties to potentially mitigate increasing concentrations of chemicals identified for issue contributing areas.</p>
26	MECP		Section 8	<p>Section 8.1.2: The capture zone delineations are generally composite capture zone envelopes that encompass the base case model and three additional calibrated models. Two of the models were calibrated to parameters that were at the upper range of the consultant’s conceptual understanding. This resulted in some areas of the model(s) that were deemed not representative at a larger scale (near Clemens Mill, Hespeler and Pinebush wellfields). This approach is conservative as it captured all particle pathways rather than just the areas where there was overlap between the capture zone delineations (i.e. increased certainty that the area is in fact within</p>	<p>Additional discussion has been provided in the Assessment Report. The approach was not peer reviewed. To clarify, the modelling approach started the calibration at the upper end of the hydraulic conductivities for the particular layers being modified in the scenario. The calibration was then allowed to proceed and would have likely resulted in final hydraulic conductivities that were less than the upper values used at the outset of the calibration.</p>

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				the WHPA when there is overlap between multiple models). The consultant attempted to address the uncertainty inherent in modelling by using multiple models that appear, in some cases, to be at the upper range of the conceptual understanding of the groundwater systems. This likely resulted in larger capture zone delineations compared with the base case only capture zone delineations. Additional explanation for using this conservative approach should be provided within the assessment report. Also, if this approach was peer reviewed, please provide the peer reviewer comments to the Ministry.	
27	MECP	Pre-Consultation	Section 8	Section 8.1.4 (page 31) indicates that no WHPA-E was delineated for the Middleton wellfield, as the municipal wells are believed to be under the influence of shallow groundwater, but not directly from the Grand River. This statement appears to be inconsistent with Section 4.1.3.5 of Region of Waterloo Wellhead Protection Area Delineation Study (Matrix Solutions Inc., February 2017), which indicates the	The Region undertook a detailed hydrogeologic investigation of the Middleton Street Wellfield in 2007 (Stantec, 2007) which included a detailed modelling assessment to evaluate the influence of the Grand River on water quality at the Middleton Well. This analysis concluded that “... recharge provided from the Upper Bedrock Aquifer in the area of the Grand River does not specifically represent water that is obtained from the Grand River, but from model grids that extend beneath a portion of the River and may include

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				Middleton Street production wells are believed to capture a component of water from the Grand River. Please explain the inconsistency between the 2 documents and confirm if the Middleton wellfield, or part of the wellfield, is designated as under the influence of shallow groundwater and the Grand River.	land adjacent to the river as well.” The conclusions in this report were used as the basis for not delineating a WHPA-E for the Middleton Wells and this rationale was provided in the Approved Assessment Report. Reference to the GUDI status of the Middleton Wells in the Matrix February 2017 report was an oversimplification of the GUDI status. It is also important to note that the basis for not delineating a WHPA-E or F for the Middleton wells, as directed in Technical Rule No. 49, was that the interaction between surface water and groundwater <u>did not</u> have the effect of decreasing the time of travel of water to the well compared to the time it would take water to travel to the well if the raw water supply to the well was not under the direct influence of surface water. Finally, it is important to note that there is a WHPA-E delineated for the well immediately south of the Middleton wells (G15) that extends well upstream of the wells and overlays a significant portion of the entire Middleton WHPA-D.
28	MECP	Pre-Consultation	Section 8	Section 2.1 of Region of Waterloo Wellhead Protection Area Delineation Study (Matrix Solutions Inc., February 2017) indicated the porosity values and municipal pumping rates were adjusted	Region staff agree that the porosity values used to delineate the well head protection areas was the same as those used in the Approved Assessment Report as stated in the last sentence of Section 2.1. As the Tier 3 Assessment would



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				from those used in the Tier 3 Assessment. However, the porosity values used in this amendment (25% for overburden and 3% for bedrock) are the same as the values used in the approved assessment report. Additional clarification or explanation of the change in effective porosity value is required.	not have used porosity as part of its water budget calculations, Region staff agree that better wording for this statement would have reduced the confusion.
29	MECP	Pre-Consultation		There are few remaining references to the Lancaster wellfield in section 8.3 that should be removed, as this wellfield is no longer included in the assessment report.	References to the Lancaster wells has been removed from Section 8.3 of the Assessment Report.
30	MECP	Pre-Consultation	Section 8	<p>The Region of Waterloo provided Appendix B (Derivation of Municipal Capture Zone Delineation Rates) in an email dated May 8, 2019 to address initial questions raised by SPPB about the capture zone rates.</p> <ul style="list-style-type: none"> <li>○ The attachment is currently missing Figure 1, which shows the demand projections to 2051 and illustrates the concept for derivation of municipal capture zone delineation rates. With this attachment missing, the average day demand projection to 2051 is not</li> </ul>	<p>Figure has been included.</p> <p>The discrepancy in the percentage increase in pumping rates over the Tier 3 Allocated Rates was a typographical error in the report as the increase was approximately 34%.</p>

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				<p>provided in the appendix.</p> <ul style="list-style-type: none"> <li>○ Section 1.4 indicates the final selected pumping rates were established at a level approximately <u>24%</u> higher than the Tier 3 Allocated Rates, which were based on the projected average day demands to 2031. However, the tables indicate the final capture zone rates for Kitchener, Waterloo and Cambridge are <u>35%</u> higher than the 2031 allocated rates (1,938 L/s vs 1,440 L/s). This apparent discrepancy should be addressed.</li> </ul>	
31	MECP	Pre-Consultation	Section 11	<p>The Bright water quality wellhead protection areas (WHPAs) were completely revised using the Whiteman’s Tier 3 water quantity model which was calibrated regionally and recalibrated locally for the water quality WHPA delineations. The redelineation completely changed the vulnerable areas for this system; the WHPAs are significantly smaller and now trend to the northeast rather than north/north-northwest. The Ministry has no concerns about the methodology employed by the</p>	Noted.

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				consultant (EarthFx) or for results of the WHPA delineation or vulnerability scoring.	
32	MECP	Pre-Consultation	Section 17	In the first section (Overview of the Water Budget Framework -17.1) the terms <i>groundwater assessment areas</i> and <i>subwatershed</i> are used. A clearer reference that a groundwater assessment area is the groundwater equivalent of a subwatershed could be made. By doing this, the Tier 2 methodology references to subwatersheds make sense for the Grand River context and is clearer to a reader who is unfamiliar with these concepts.	A clearer definition of groundwater assessment areas was added to Section 17.
33	MECP	Pre-Consultation	Section 17	The third paragraph of section 17.1 states that “those subwatersheds and assessment areas identified within the Tier 2 study as having a moderate to high potential for water use stress moved to the Tier 3 stage”. Only subwatersheds and groundwater assessment areas that supported municipal drinking water supplies were advanced to Tier 3. Please revise the statement for technical accuracy.	Statement has been revised to make it clear that only subwatersheds or groundwater assessment areas that support municipal drinking water supplies advance to a Tier 3 Assessment.

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34	MECP	Pre-Consultation	Section 17	Table 17-1 (page 2) could benefit from the addition of the term “intakes” to remind the reader that it refers to surface water municipal supplies.	The word “intakes” was added.
35	MECP	Pre-Consultation	Section 17	A note under Table 17-2 (page 2) indicates that an additional technical report completed for the Big Creek groundwater assessment area determined that a Tier 3 study for the community of Lynden was not required; however, the details of this report do not appear anywhere within the assessment report including Chapters 12 (City of Hamilton – Lynden Communal System), 17 or 18. Given that the Tier 2 (2009) report indicated that the ground water supply for the Village of Lynden met the requirements for a Tier 3 water quantity risk assessment, a summary of the details of this additional assessment would be prudent.	Results of the technical report for the Big Creek groundwater assessment area were summarized in a paragraph in Section 17.
36	MECP	Pre-Consultation	Section 17	Table 17-3 (page 5): please revise the first bullet of the ‘significant risk’ row of the table as it is currently missing a reference to future municipal pumping rates. Additionally, consider using more plain	Table updated. “Allocated pumping rate” language updated to “future pumping rate”

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				language as the use of “allocated pumping rates” could be confusing for someone unfamiliar with the subject matter.	
37	MECP	Pre-Consultation	Section 17	Table 17-4 (pages 6-9) is taken directly from the Director’s Technical Rules and contains complex information (i.e. references to Part IX). Although a summary of the purpose of the table is provided directly above it on page 6, please consider revising the table to be more plain language for ease of understanding.	Table removed from assessment report and reference added to Director’s Technical Rules.
38	MECP	Pre-Consultation	Section 19	This section uses the term <i>allocated rates</i> throughout the report and we suggest using the executive summary developed by the GGET Project Team (linked below). Currently, this section does not make a strong enough connection that allocated rates are being used as the approximation of future municipal demand, and by using more plain language it would make the Tier 3 technical reports easier to understand for the public. <a href="https://www.sourcewater.ca/en/source-">https://www.sourcewater.ca/en/source-</a>	The GGET Tier 3 section has been removed from this Section 34 assessment report update as the policies for the WHPA-Q are not complete. This section will be part of a future Section 34 update, once the policies are complete. This comment will be addressed at that time.

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				<a href="#">protection-areas/resources/Documents/Grand/GGET-Tier-3-WQRA---Executive-Summary-Final-April-3_17.pdf</a>	
39	MECP	Pre-Consultation	Section 19	On page 1, please consider rephrasing ‘the Ontario Ministry of Environment and Climate Change (MOECC) released a set of Technical Rules (MOECC, 2016) that require Tier 3 Assessments be completed in subwatersheds that have a Moderate or Significant water quantity stress in areas that supply municipal drinking water’ as it reads like a change was made to the Technical Rules which required the completion of the Tier 3, which is incorrect. The 2016 reference is only the most current version of the Technical Rules.	The GGET Tier 3 section has been removed from this Section 34 assessment report update as the policies for the WHPA-Q are not complete. This section will be part of a future Section 34 update, once the policies are complete. This comment will be addressed at that time.
40	MECP	Pre-Consultation	Section 19	Table 19-7 (Summary of Permitted Rates and Consumptive Demands by Water Use Sector for Study Area, page 23) please consider adding an additional column to the table with a “date current to” for the PTTWs.	The GGET Tier 3 section has been removed from this Section 34 assessment report update as the policies for the WHPA-Q are not complete. This section will be part of a future Section 34 update, once the policies are complete. This comment will be addressed at that time.
41	MECP	Pre-	Section 19	Please add a note referencing the year the enumerated threat counts were done	The GGET Tier 3 section has been removed from this Section 34 assessment report update as the

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		Consultation		as part of the Risk Management Measures Evaluation Process (RMMEP) to Table 19-8 (Summary of Significant Water Quantity Threats, page 28).	policies for the WHPA-Q are not complete. This section will be part of a future Section 34 update, once the policies are complete. This comment will be addressed at that time.
42	MECP	Pre-Consultation	Section 19	The section summary (page 33) indicates that the extent of the WHPA-Q-A to the southwest toward the City of Cambridge was delineated based on the results of the GGET Tier 3 Assessment and the Region of Waterloo Tier 3 Assessment completed for the municipal wells in the City of Cambridge. Map 19-10 (page 31) shows the WHPA-Q boundary near Cambridge abruptly cut off and the reasoning for that determination should be made clearer to the reader. For example, it could be mentioned that the boundary was determined with an additional technical assessment and direct the reader to the memo in the Tier 3 appendices or referencing the more fulsome discussion in Section 20.3.2.	The GGET Tier 3 section has been removed from this Section 34 assessment report update as the policies for the WHPA-Q are not complete. This section will be part of a future Section 34 update, once the policies are complete. This comment will be addressed at that time.  The Region of Waterloo Tier 3 Chapter in the current Section 34 assessment report update has been updated to address this comment.
43	MECP	Pre-Consultation	Section 20	The summary of this study is extremely technical and would be difficult for a member of the public to understand. The Tier 3 summary used for Long Point is	The Region of Waterloo Tier 3 section was updated to focus less on process and more on the linkages between purpose and the findings of the study. Language was adjusted to be less technical

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				good example of Tier 3 results being presented at a more appropriate level and we suggest this is similarly revised for better clarity. There is a focus on the process, and this section could benefit from better linkages between the purpose and the findings of the study. In addition, it would be helpful as well to use plain language descriptions of what is being assessed rather than references to specific risk assessment scenarios in short form (e.g. G2) without a link to the table of scenarios elsewhere in the document.	(plain).
44	MECP	Pre-Consultation	Section 20	This section of the assessment report would also benefit from the reminder that the low risk level means there are no significant water quantity threats (i.e. risk level circumstances on page 42).	A statement indicating that there are no significant water quantity threats has been added to the Amended Assessment Report.
45	MECP	Pre-Consultation	Section 21	Please refer to the general comment on the use of plain language content.	Whiteman’s Creek Tier 3 summary has been removed from this update and will be part of another Section 34 update. This comment will be addressed as part of a future Section 34 update.
46	MECP	Pre-Consultation	Section 22	Please refer to the general comment on the use of plain language content.	Orangeville and Amaranth Tier 3 section has been updated to use more general and plain language.
47	MECP	Pre-	Section 23	On page 1 it states that ‘the Tier 3	Halton Hills Tier 3 section has been removed from



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		Consultation		hydrologic model improves on the Tier 2 Water Budget model for the model simulation and representation of groundwater movement between and across subwatershed boundaries’. Please clarify if this statement should be hydrologic and/or hydrogeologic as is used in the next paragraph. If the comment relates only to the surface water model, further explanation as to why only the surface water model was improved is recommended.	<p>this Section 34 update and will be part of the Wellington Tier 3 Section 34 update as that is when polices will be ready.</p> <p>This comment will be addressed as part of a future Section 34 update.</p>
48	MECP	Pre-Consultation	Section 26	In Watershed Characterization (page 1), Elmira was removed from the list of communities that are part of the Integrated Urban System (IUS); however, page 12 includes Elmira as one of the communities connected to the IUS. Please verify and address this discrepancy.	Elmira receives drinking water from the IUS, but they do not provide water to the IUS. The assessment report has been updated to clarify this.
49	Public	Public Consultation	Section 6	A few comments specific to the County of Wellington-Rockwood water information: - why was OMAFRA's GIS and farms with nutrient management plans not used as a source of information instead of guessing at barn structures and livestock	Questions and comments have been noted and will be addressed through a future update of the Wellington County section of the assessment report planned for 2020.

Table 1: Draft Updated “Bundled” Assessment Report – Pre-Consultation and Public Consultation Comments					
#	Comment Source	Comment Period	AR Section	Comment	How Comment was Addressed
				<p>information?</p> <ul style="list-style-type: none"> <li>- if the flouride and sodium in the Rockwood well is so high, why isn't more frequent testing being done</li> <li>- the map 7-45, I believe is the correct reference, does not include all known quarries, active and inactive, within the Guelph-Eramosa Township area</li> <li>- this assessment contains an incredible amount of speculation. Why was evidence not actually gathered? Most statements have multiple caveats of possible or potential with no actual evidence-based conclusions.</li> <li>- it is difficult for land-owners to discern how this applies to them and what they should do or change</li> </ul>	<p>Wellington Source Water Protection encourages land owners or residents that have questions related to source protection to call or visit the County’s website <a href="http://www.wellingtonwater.ca">www.wellingtonwater.ca</a>. Wellington Source Water Protection is a partnership of all the municipalities within the County of Wellington to implement the Clean Water Act.</p>

<b>Table 2: Draft Updated “Bundled” Source Protection Plan – Pre-Consultation Comments</b>				
<b>#</b>	<b>Comment Source</b>	<b>SPP Section</b>	<b>Comment</b>	<b>How Comment was Addressed</b>
1	MECP	General	In the source protection plan, Ministry of Environment (MOE) has been updated to reflect our new name, Ministry of Environment, Conservation and Parks (MECP). Please make a note in your plan that MOE refers to MECP or ensure all of the previous acronyms are corrected as a few instances of the previous Ministry name remain (e.g. RW-MC-11.1).	Acronyms corrected to reflect new name.
2	MECP	General	Please verify all revisions to vulnerability scores with pathogen and chemical threat tables and ensure a statement in the plan (and assessment report) refers to the 2017 version of the Technical Rules being used for these amendments.	Verified that all vulnerability scores with pathogen and chemical threat tables and ensure a statement in the plan refers to the 2017 version of the Technical Rules.
3	MECP	General	As a reminder, an amendment to the source protection plan requires an update the ‘Summary of Consultation’ section to reflect the various stages of consultation carried out for the amendment.	Summary of consultation section updated.
4	MECP	Section 10	Please revise policy RW-MC-2, RW-CW-3, and RW-CW-4 to ensure the correct vulnerability score applies to the applicable waste activity for technical accuracy.	Application of hauled sewage separated from current sub policies in RW-MC-2, RW-CW-3, and RW-CW-4 to reflect correct vulnerability scores at which these activities can be significant.
5	MECP	Section 10	Please revise policy RW-CW-21.1 to remove MECP as an implementing body, as MECP has no role in issuing Nutrient Management Plan and Nutrient Management Strategy documents.	Reference to MECP has been removed from policy RW-CW-21.1.
6	MECP	Section 10	Policy RW-CW-26.1 requires MECP and OMAFRA to prohibit NASM storage and application through NMA instruments (i.e. NASM Plans). MECP is not the correct implementing body for this policy as we have no role in issuing NASM Plans.	Clarification that MECP regulates this activity through ECAs added to RW-CW-26.1.