



Raisin Region Conservation Authority

Source Protection Authority Meeting Agenda

November 28, 2024

3:00 p.m.

RRCA Administration Office – 18045 County Rd. 2, Cornwall, ON

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1. Call to Order
 2. Chair's Remarks
 3. Approval of Agenda
 4. Declaration of Conflict of Interest
 5. Approval of Minutes
 - a) Source Protection Authority Minutes of June 20, 2024 1-2
 6. New Business
 - a) Risk Management Official and Inspector Appointment (Jason) 3
 - b) Section 36 Amendment Update (Jason) 4-7
 7. Date of Next SPA Meeting: TBD
 8. Adjournment

Alison McDonald,
General Manager

/js

MINUTES OF A MEETING OF THE
RAISIN REGION SOURCE PROTECTION AUTHORITY
HELD JUNE 20, 2024 – 3:00 P.M. RRCA ADMINISTRATION OFFICE

PRESENT: Bryan McGillis, South Stormont, Chair
Lachlan McDonald, South Glengarry
Martin Lang, South Glengarry
Carilyne Hebert, City of Cornwall
Claude McIntosh, City of Cornwall
Adrian Bugelli, North Stormont

STAFF: Alison McDonald, General Manager
Josianne Sabourin, Administrative Assistant
Phil Barnes, Team Lead, Watershed Management
Scott Braithwaite, Project Assistant
Sandy Crites, Finance Officer
Brendan Jacobs, Stewardship Specialist
Matthew Levac, Planning & Regulations Officer
Richard Pilon, General Manager/Secretary-Treasurer
Pete Sabourin, Team Lead, Field Operations
Jason Symington, Project Manager

REGRETS: Jacques Massie, North Glengarry, Vice-Chair

ABSENT: Andrew Guindon, South Stormont

CALL TO ORDER

Bryan McGillis, Chair, called the meeting to order at 3:00 pm.

APPROVAL OF AGENDA

RESOLUTION #SPA 11/24:

Moved by: Adrian Bugelli
Seconded by: Lachlan McDonald

THAT the agenda be approved as presented.

CARRIED

DECLARATION OF CONFLICT OF INTEREST

None

**APPROVAL OF RAISIN REGION SOURCE PROTECTION AUTHORITY MEETING MINUTES
– meeting held April 18, 2024**

RESOLUTION #SPA 12/24:

Moved by: Martin Lang
Seconded by: Carilyne Hebert

THAT the minutes of the April 18, 2024 meeting of the Raisin Region Source Protection Authority be approved.

CARRIED

NEW BUSINESS

SOURCE PROTECTION COMMITTEE APPOINTMENT

RESOLUTION #SPA 13/24:

Moved by: Carilyne Hebert

Seconded by: Martin Lang

THAT the Raisin Region Source Protection Authority appoint Glenn Mackey as the representative for the United Counties of Leeds and Grenville on the Raisin-South Nation Source Protection Committee.

CARRIED

DATE OF NEXT MEETING

To be determined

ADJOURNMENT

RESOLUTION #SPA 14/24:

Moved by: Adrian Bugelli

Seconded by: Martin Lang

THAT the Raisin Region Source Protection Authority meeting of June 20, 2024 be adjourned at 3:20 pm.

CARRIED

Bryan McGillis
Chair

Jason Symington
Project Manager



To: Raisin Region Source Protection Authority
From: Jason Symington, Project Manager
Date: November 20, 2024
Subject: Risk Management Official and Inspector Appointment

RECOMMENDATION:

The Raisin Region Source Protection Authority appoint Alison McDonald as Risk Management Official and Risk Management Inspector pursuant to subsection 48 (2) of the Clean Water Act, 2006.

Background:

The Raisin-South Nation Source Protection Plan contains policies that regulate significant drinking water threats under Part IV of the *Clean Water Act*. Under the Act, a municipality may enter into an agreement with a Source Protection Authority to enforce Part IV of the Act for the regulation of drinking water threats. The RRCA was delegated risk management responsibilities by the Townships of North Glengarry, South Glengarry, and South Stormont. The City of Cornwall has maintained their own authority to protect their own water supply and the Township of North Stormont has delegated this responsibility to SNC.

To fulfil this regulatory role, the Source Protection Authority must appoint Risk Management Officials (RMO) and Risk Management Inspectors (RMI) pursuant to subsection 48(2) of the *Clean Water Act* to administer and enforce Part IV policies. The RRCA currently has 2 staff appointed as RMO / RMI and another as an RMI.

Discussion:

Staff recommend appointing Alison McDonald as RMO / RMI to support risk management responsibilities, when required. Alison McDonald has successfully completed the Ministry of Environment Conservation and Parks RMO / RMI training course and is qualified to carry out these duties.

A handwritten signature in black ink, appearing to read 'JS'.

Jason Symington,
Project Manager
Raisin-South Nation Source Protection Region



To: Raisin Region Source Protection Authority
From: Jason Symington, Project Manager
Date: November 20, 2024
Subject: Section 36 Amendment Update

RECOMMENDATION:

That Raisin Region Source Protection Authority receive and file the Section 36 Amendment Update.

Background:

On November 30, 2018, the Raisin-South Nation Section 36 Workplan was submitted to the Ministry of Environment, Conservation and Parks (MECP) in compliance with the order dated October 23, 2014, under Section 36 of the Clean Water Act. On July 22, 2019, we received an amended order from the Minister, which outlined the requirements governing the contents and timeframes for the review process of any updates.

Since then, staff have been working to implement the revisions specified in the order and to align our Source Protection documents with the revised 2021 Technical Rules.

The revised Source Protection Plan (SPP) and Assessment Reports (ARs) were submitted for Early Engagement on July 11, 2023, with comments from the MECP received on November 22, 2023.

Discussion:

On September 23, 2024, the revised SPP and ARs were circulated for Pre-Consultation to all Implementing Bodies for review and comment. These bodies include relevant ministries, our municipal partners, and 200 properties potentially impacted by policy changes.

On November 1, 2024, the Raisin-South Nation Source Protection Region received the attached comments from the MECP. On November 14, 2024, these comments were presented to the Source Protection Committee (SPC). As the comments were largely editorial in nature, the SPC directed staff to address them as proposed and to proceed with the public consultation on the draft plan.

A handwritten signature in black ink, appearing to be 'JS'.

Jason Symington,
Project Manager
Raisin-South Nation Source Protection Region

Jason Symington
Drinking Water Protection Project Manager
Raisin-South Nation Source Protection Region
c/o Raisin Region Conservation Authority
18045 County Road 2
P.O. Box 429
Cornwall ON K6H 5T2

November 1, 2024

Dear Mr. Jason Symington,

Thank you for considering the comments provided to the former Project Manager Lisa Van de Ligt on November 22, 2023, as part of early engagement on Raisin-South Nation Source Protection Region's section 36 updates to its assessment reports and source protection plan and for providing the Conservation and Source Protection Branch (CSPB) with the opportunity to submit additional comments during the pre-consultation phase of consultation.

As part of the pre-consultation phase of the review process, the updated assessment reports (ARs) and source protection plan (SPP) for Raisin-South Nation were also circulated to the Ministry of Environment Conservation and Parks (MECP) program areas for their review and comment. The following comments, including from staff at the CSPB, are provided for your further consideration as you prepare the updated AR and SPP for public consultation.

Comments on the updated Assessment Reports

Please clarify why the road salt application has not been enumerated for drinking water systems (DWSs) where their vulnerability scores and the percentage of impervious surface area trigger a significant risk of this activity. Examples of these systems are shown in the table below. Also, please double-check whether there are other DWSs where road salt application could be identified as a significant risk.

SPA	DWS	Zone/score	Trigger for SDWT	Associated maps
Raisin	Alexandria	IPZ-1(10)	6-8% IS/IMP	5.7.4 & 5.7.7
South Nation	Shadow Ridges	WHPA-B(10)	>= 30% IS/IMP	5.3.4 & 5.3.8
	Winchester	WHPA-B(10)	>= 30% IS/IMP	5.8.5 & 5.8.8
	Bennett Street	WHPA-A & B (10)	>= 30% IS/IMP	5.11.5 & 5.11.8
	Wendover	IPZ-1(10)	6-8% IS/IMP	5.16.4 & 5.16.7
	Casselman	IPZ-1(10)	6-8% IS/IMP	5.19.4 & 5.19.7

Comments on updated Source Protection Plan (SPP)

Identification of threat circumstances to align with the amended Technical Rules

While our review concludes that you have addressed these considerations, as a general reminder, when the Rules were updated in 2021 changes were made to the circumstances under which certain threat activities could be significant (e.g., handling and storage of dense non-aqueous phase liquids, fuel, and snow storage), and new waste threat sub-categories were also created (i.e., application of processed organic waste (POW) to land, storage of POW and storage of hauled sewage). In preparing your further plan amendments, please review all policies in light of these changed threat circumstances to ensure that threats are adequately addressed, and that both the source protection authority and committee are of the opinion that the current policies are still advisable [as per s.48 (1) of O.Reg. 287/07].

Other comments

- Consider splitting SEWG-1 into two different policies according to policy tool and implementer (Specify Action – Municipalities; Prescribed Instrument – MECP), as this is easier for the public and the implementer to understand.
- Correct references to *Pesticides Act, 1990* on page 23 and 24, from 'Pesticide' to 'Pesticides'.
- Check PEST-3 and all references to the policy (such as the policy intent on p. 23, header 3 on p. 24) for continuity about whether the policy pertains to 'application, storage and handling', or 'storage and handling', or 'storage'.
- SALT-4 is a specify action policy directed toward the Ministry of Transportation that is not legally binding. Please adjust the language of the 'Policy Intent' (p. 25) to reflect the non-binding nature of the policy by modifying the language of 'requirements' to 'recommendations'.
- SALT-5 should not be included in List K. It is a legally binding policy because it addresses significant threats in circumstances and volumes not covered by other legally binding policies for road salt threats. Please also change the header of SALT-5 to reflect the threat being addressed.
- Revise PIPE-1 to reflect that the implementer for the policy is now 'pipeline owners' by removing "recommend necessary improvements..." from the policy text and the policy intent.
- Clarify the action of MONITORING-5. i.e., "This includes the CLI reporting requirements of SEWG-7".

- A complete Prescribed Instruments policy should name the provincial instrument and the person/body responsible for issuing those instruments.
 - Please make changes to SNOW-3 to reference the Ministry of the Environment, Conservation and Parks (MECP) and the *Ontario Water Resources Act, 1990* in the policy text.
 - Please make changes to the first paragraph of SEWG-7 to identify the MECP as the implementer.
- Revise the Glossary entry on Environmental Compliance Approval (ECA) to reflect that ECAs are associated with both the Environmental Protection Act (EPA) and the Ontario Water Resources Act (OWRA).

General Reminders

- Please make changes to the Explanatory Document where new policies are being added to the source protection plan and existing policies are being revised.
- With respect to the Summary of Consultation Comments sections in the SPP, ARs, and Explanatory Document:
 - Please update the section to include all required consultation activities as per the amended order (*pre-consultation, public consultation and any public meetings*).
 - Public consultation must be a minimum of 35 days.
 - As per the Minister's Order, comments received shall be documented, considered, and addressed before advancing to the next consultation stage or finalizing the proposed updates to the assessment report and plan.
- Please refer to Appendix D: Submission Requirements for Assessment Report and Plan Revisions as part of the *Source Protection Planning Bulletin – Overview of Requirements for Plan and Assessment Report Amendments and Updates under sections 34, 35 and 36 of the Clean Water Act* for a checklist of items to include in your final submission.

We hope these comments are helpful. Please do not hesitate to contact me if you have questions.

Monika Lemke, Program Analyst
 MECP Conservation and Source Protection Branch
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C: Jennifer McKay, Manager, Source Protection Section, CSPB
 Wendy Lavender, Manager, Technical and Program Delivery Section, CSPB
 George Jacoub, Watershed Management-Research Scientist, P.Eng., CSPB