



March 3, 2020

**Subject: Town of Erin 2019 Risk Management Official and Municipal Annual Reports**

For reporting purposes, the Town of Erin is subject to two Source Protection Plans (based on watershed or Conservation Authority boundaries): the Credit Valley, Toronto and Region and Central Lake Ontario (CTC) Plan and the Grand River Plan. In 2019, all Source Protection Plans were in effect.

Under Section 81 of the Clean Water Act and Section 65 of O. Reg. 287/07, an annual report must be prepared by a Risk Management Official and submitted to the appropriate Source Protection Authority (Conservation Authority) by February 1<sup>st</sup> of each year. Under Section 45 of the *Clean Water Act*, a public body, including a municipality, must comply with monitoring and reporting policies designated by a Source Protection Plan. The Town of Erin 2019 Risk Management Official and Municipal Annual Reports were prepared and submitted electronically to the appropriate authorities by February 1, 2020. These submissions are completed by Wellington Source Water Protection staff (Risk Management staff) on behalf of the Town.

**Summary of Key Aspects**

The Wellington County municipalities continue to implement source protection under the Wellington Source Water Protection partnership, [www.wellingtonwater.ca](http://www.wellingtonwater.ca). In 2019, progress continued in the implementation of source protection in the municipality.

A summary of key aspects of the Risk Management Official Report and Municipal Report are provided below.

In 2019, there were 5 development review notices issued per Section 59 of the Clean Water Act within the municipality. Additionally, Risk Management staff comments were provided on an additional 27 applications that did not require development review notices, for a total of 32 development applications (notices and comments) reviewed in the municipality. There were 37 Section 59 notices issued County wide and Risk Management staff comments on 207 additional development applications, County wide, for a total of 244 development applications (notices and comments) reviewed County wide in 2019. This represents a decrease in the total number of development applications (notices and comments) reviewed County wide from 2018 (351), however, it is in line with previous years: 2016 (137) and 2017 (269). Part of the decrease in County wide notices resulted in changes to the ABMV Source Protection Plan that allows screening out of certain residential building and planning applications in the Town of Minto.



For the municipality, 2019 is generally consistent with previous years in the number of development comments from previous years although there was a drop in the number of development notices (9 notices and 9 comments in 2016, 8 notices and 12 comments in 2017, 10 notices and 26 comments in 2018). In addition to the notices and comments provided, other applications were screened out by building or planning staff following Risk Management Official Written Direction provided by Wellington Source Water Protection.

In 2019, the source protection staffing complement, County wide, dropped from 2.3 full time equivalents to 2.0 full time equivalents with administrative support provided by the Township of Centre Wellington. All municipalities have, at a minimum, two staff members appointed as Risk Management Officials and Inspectors. These staff are well supported by the internal Wellington Source Protection Working Group which is comprised of other departmental staff from all eight Wellington municipalities including building officials, planners, water compliance staff, public works staff and Chief Administrative Officers. Also in 2019, two co-op students assisted source protection staff with a variety of tasks in the summer and fall.

Analysis continued on the threat verification data collected in previous years on residential, agricultural, industrial, commercial and institutional activities identified as potential significant drinking water threats in the approved Assessment Reports. Staff complete a variety of tasks to remove or confirm and then mitigate activities identified as potential significant drinking water threats in the approved Assessment Reports. These threat activities are existing and the analysis can involve desk top interpretation of air photos or GIS data, phone calls, review of municipal records, windshield surveys, site inspections by Risk Management staff and if confirmed, then mitigation through septic inspection, prohibition and / or negotiation of risk management plans. As a result of this analysis, staff currently estimate approximately 10% of threat activities in the municipality still require action to either remove or confirm / mitigate the threat activities while 90% have been either removed or confirmed and mitigated.

To support this threats analysis and to determine compliance, 9 inspections were conducted in the Town in 2019. 6 inspections were conducted for compliance purposes (prohibition) with no contraventions found. There were 3 inspections conducted for threat verification or risk management plan purposes in the Town in 2019. County wide, 75 inspections were conducted in 2019 with 65% of inspections (49) conducted for threat activity verification or risk management plan purposes and 35% (26) of inspections were prohibition compliance inspections. To date, the focus for threat verification analysis and inspections has been industrial, commercial and institutional threat activities, residential septic systems, fuel oil use or agricultural activities within 100 metres of municipal wells. In 2020 and beyond, it is anticipated that threat verification activities will include more agricultural activities. The remaining threat activities in the municipality are primarily agricultural with some industrial or commercial. In the latter half of 2019 and into the beginning of 2020, a concerted effort has



been started to engage the agricultural properties in order to complete threat verification and initiate risk management plan negotiation if required. To date, the response rate has been positive from the agricultural properties.

One Risk Management Plan was agreed to in 2019 and seven are in the process of negotiation for the municipality. Cumulatively, there is 1 Risk Management Plan complete in the Town and 19 Risk Management Plans complete County wide. County wide, the number of Risk Management Plans in progress is 85 and the number of complete Risk Managements increased from 11 to 19 in 2019. There will be a continued focus in 2020 on negotiating risk management plans. It should be noted, however, there are a number of factors that could delay Risk Management Plan completion including other time sensitive projects such as Source Protection Plan amendments, Tier 3 studies or development reviews and review time and / or reluctance from property owners, tenants or contractors.

In 2019, County wide, staff continued the implementation of the source protection education and outreach program as required by the applicable Source Protection Plans. The communications plan was updated to provide direction on future education and outreach deliverables. The update of the communication plan built on the existing 2014 communications plan and now identifies six strategies for implementation within the source protection program. These strategies are: targeted communications to those living in vulnerable areas, increased general public awareness of the program, promotion of the Tier 3 water budget results and requirements, septic inspection program outreach, road salt education program and education focused on school aged children. These six strategies build on the education work already being completed over the past five years within the County. In addition to these strategies, internal staff training will also remain a focus. Work has started on delivering the communications products identified in the communications plan including new fact sheet and website content, a social media plan and other products.

In 2019, one training sessions was run for municipal staff. Four newspaper ads were run during the year on topics related to water conservation, chemical handling and changes to the Source Protection Plans. Staff also attended 4 public meetings on a variety of topics including Source Protection Plan changes, Tier 3 studies and other technical studies / applications. Site visits, inspections, development reviews and mailings were conducted in 2019 that included educational material being provided directly to the proponents generally regarding the threats present, the process (RMP, prohibition etc.) and property specific mapping. This material was generally well received and found to be useful by the proponents. Stickers and metal tags are provided to proponents listing the Spills Action Centre number and that their location is located within a vulnerable area for municipal wells. Wellington Source Water Protection continues to maintain and update a website ([www.wellingtonwater.ca](http://www.wellingtonwater.ca)), ten fact sheets on specific topics and other print media (i.e. post cards to direct applicants to mapping). Staff participate and



Wellington Source Water Protection is a sponsor for the Waterloo-Wellington Children's Groundwater Festival. Staff participate on the organizing committee as well as during the Festival to deliver presentations. The Children's Groundwater Festival is an excellent way to reach Grade 2 to 5 and high school children (and their parents) and deliver water protection messages including source protection. The Festival attracts 5,000 elementary children and 500 high school / adult volunteers. Approximately 600 children attend from the County of Wellington as well as participation from a County high school and companies / municipalities as volunteers.

In 2019, staff were involved in reviewing, authoring and / or participating in a significant number of Source Protection Plan amendments and / or work plans for 3 of the 5 applicable Source Protection Plans in the County. The amendments were primarily focused on policy updates and / or technical updates including a large update for the Grand River – Wellington County chapter. The Grand River – Wellington County update included changes to the Assessment Report and Source Protection Plan. In partnership with the Grand River Conservation Authority, public consultation ended in February 2020 and provincial approval is anticipated later in 2020.

The Assessment Report changes include the delineation of new wellhead protection areas for quality within Centre Wellington and Guelph / Eramosa and new issues contributing areas (ICA) in Centre Wellington and Puslinch. This is based on the technical studies completed in 2018. The new Guelph / Eramosa wellhead protection areas extend into the Town of Erin, however, overall there is a reduction in the area where policies apply within the Town from the Guelph / Eramosa wellhead protection areas. There are a large number of policy changes also contained in this update, with the majority of the policy changes related to chloride or road salt activities (storage and application) and are due to the new Chloride Issue Contributing Areas in Centre Wellington and Puslinch. The policy approaches include prohibition, risk management plan, education and other approaches to manage the road salt related threat activities. In addition to the policy changes related to road salt and the chloride ICAs, other policies were amended to address implementation challenges or changes to provincial guidance. It should be noted that it is possible the road salt policies may apply in the future outside of the chloride issue contributing areas within other parts of the wellhead protection areas. This is due to possible changes to the Provincial thresholds related to road salt. Consultation on changes to these thresholds started in 2019 and staff participated in these provincial consultations. Lake Erie Source Protection Committee circulated a report in December 2019 related to these proposed road salt changes. A decision has not been made yet regarding overall provincial changes to road salt thresholds.

Tier 3 (water quantity) technical studies continue for Guelph and Guelph / Eramosa. Staff and consultants continued to participate in meetings and review for these studies in 2019. This project is led by the Grand River Source Protection Authority (GRCA) and funded by the Ontario



Ministry of the Environment and Climate Change. The Town Risk Management Official participates on the project team along with the Source Protection Authority staff and the Province. The study area includes the western portion of the Town of Erin. The 2019 work included finalizing policy approaches, drafting policy text and significant discussion and collaboration with project team (including City of Guelph, Provincial Ministries, and adjacent non-Wellington municipalities) on the proposed policy text. There was also ongoing public and municipal consultation through Community Liaison Group and Implementing Municipal Group.

Tier 3 (water quantity) technical studies also continued for Centre Wellington. The study area includes the Township of Centre Wellington, as well as parts of the Townships of Guelph/Eramosa, Wellington North, Mapleton and the Town of Erin. The 2019 technical work involved completion of the development, calibration and documentation of the groundwater model and the draft risk assessment. Similar to previous years, a third party consultant (RJ Burnside) provided review comments on the completed and draft reports on behalf of the adjacent municipalities including the Town. Based on the risk assessment, the risk level was determined to be significant and a Wellhead Protection Area – Quantity has been drafted. The Wellhead Protection Area – Quantity encompasses parts of Centre Wellington and southern Mapleton. Based on this result, policy requirements will not be applicable within the Town of Erin related to the Centre Wellington Tier 3 study.

All required septic system inspections, in the municipality, for the 2015 to 2020 inspection period are complete. The next septic system inspection program will commence in 2020 or 2021. If a septic system is present within well head protection area with a vulnerability score of 10 or within an issues contributing area for nitrates, a septic inspection is required every 5 years.

In 2019, technical support was provided for the Town of Erin's Class Environmental Assessment for new Water Supply Wells and for the Growth Management Strategy. As reported previously, the County Official Plan was amended in 2016 to conform to the five Source Protection Plans in the County. At this time, the Town's local Official Plan and zoning by-law have not been amended to conform to the Source Protection Plans.



Attached for your reference is summary table of source protection implementation for all municipalities in Wellington County (the County and seven, local municipalities). For further information, please contact Kyle Davis, Risk Management Official, 519-846-9691 ext 362 or [kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)

Respectfully submitted,

Kyle Davis  
Risk Management Official

**Attachment**

1. Source Protection Annual Reporting Summary 2019 – Wellington County municipalities

Source Protection Annual Reporting Summary 2019 - Wellington County municipalities

Reportables		Centre Wellington	Guelph/Eramosa	Mapleton	Puslinch	Wellington North	Erin	Minto	County of Wellington	Total
Septic Inspection Program (Cumulative)	Completed	24	415	N/A	54	9	127	6	N/A	635
	Outstanding	0	6	N/A	0	0	0	0	N/A	6
	Major Remedial Action	5	27	N/A	1	1	8	0	N/A	42
	Minor Remedial Action	4	79	N/A	12	1	14	1	N/A	111
	Septic Socials	1	3	N/A	2	1	1	1	N/A	9
S59 Notices Issued for Reporting Year		9	8	0	1	5	5	9	N/A	37
Comments on Development reviews (in addition to notices) for Reporting Year		33	35	37	52	10	27	13	N/A	207
Total Development Reviews and S59 Notices for the Reporting Year		42	43	37	53	15	32	22	N/A	244
Total Inspections for the Reporting Year (Section 62)		9	27	5	1	11	9	13	N/A	75
Inspections for Section 57 Prohibition for Reporting Year		4	5	4	0	6	6	1	N/A	26
Inspections for Section 58 Risk Management Plans for Reporting Year		5	22	1	1	5	3	12	N/A	49
Contraventions during Inspections for Reporting Year		0	0	0	0	0	0	0	N/A	0
Transport Pathway Notices		1	1	0	1	0	0	0	N/A	3
% Threat Activities Removed or Managed since Source Protection Plan effective date		89%	62%	43%	42%	89%	90%	83%	N/A	71%
RMPs	Cumulative Completed since SPP Effective Date	6	3	0	0	2	1	7	N/A	19
	Completed in Reporting Year	1	0	0	0	1	1	5	N/A	8
	In Progress	23	22	1	1	18	7	13	N/A	85
Chemical Management Plan (Official Plan Section 4.9.5) Cumulative Completed		0	3	0	0	1	1	1	N/A	6
Database Development		Continued database development is ongoing for the source protection cloud based database. In 2019 live entry of development review applications was made operational and data entry back log was reduced. The legal collaboration agreement that governs the management and cost structure for the database with our other municipal and Conservation Authority collaborators was updated and signed. Numerous improvements were made in the functionality of the database.								
Comments on Prescribed Instruments (Provincial Approval such as Permits to Take Water)		0	2	0	1	0	0	0	N/A	3



Source Protection Annual Reporting Summary 2019 - Wellington County municipalities

Reportables	Centre Wellington	Guelph/Eramosa	Mapleton	Puslinch	Wellington North	Erin	Minto	County of Wellington	Total
Education and Outreach	<p>The following is a summary of the E and O results, County wide, for 2019. The communications plan was updated to provide direction on future education and outreach deliverables. The update of the communication plan built on the existing 2014 communications plan and now identifies six strategies for implementation within the source protection program. These strategies are: targeted communications to those living in vulnerable areas, increased general public awareness of the program, promotion of the Tier 3 water budget results and requirements, septic inspection program outreach, road salt education program and education focused on school aged children. These six strategies build on the education work already being completed over the past five years within the County. In addition to these strategies, internal staff training will also remain a focus. Work has started on delivering the communications products identified in the communications plan including new fact sheet and website content, a social media plan and other products.</p> <p>In 2019, one training sessions was run for municipal staff. Four newspaper ads were run during the year on topics related to water conservation, chemical handling and changes to the Source Protection Plans. Staff also attended 4 public meetings on a variety of topics including Source Protection Plan changes, Tier 3 studies and other technical studies / applications. Site visits, inspections, development reviews and mailings were conducted in 2019 that included educational material being provided directly to the proponents generally regarding the threats present, the process (RMP, prohibition etc.) and property specific mapping. This material was generally well received and found to be useful by the proponents. Stickers and metal tags are provided to proponents listing the Spills Action Centre number and that their location is located within a vulnerable area for municipal wells. Wellington Source Water Protection continues to maintain and update a website (www.wellingtonwater.ca), ten fact sheets on specific topics and other print media (i.e. post cards to direct applicants to mapping). Staff participate and Wellington Source Water Protection is a sponsor for the Waterloo-Wellington Children's Groundwater Festival. Staff participate on the organizing committee as well as during the Festival to deliver presentations. The Children's Groundwater Festival is an excellent way to reach Grade 2 to 5 and high school children (and their parents) and deliver water protection messages including source protection. The Festival attracts 5,000 elementary children and 500 high school / adult volunteers. Approximately 600 children attend from the County of Wellington as well as participation from a County high school and companies / municipalities as volunteers.</p>								
Road Signs (not including provincially installed signs)	0	0	0	0	11	0	15	N/A	26
Emergency Management Plan	Complete	Complete	Complete	Complete	Complete	Complete	Complete	Complete	1
Official Plan Update	County Complete, Local not required	Complete	Complete	Complete	Complete	County Complete, Local to be completed	Complete	Complete	1
ZBL Update	Complete	Complete	Complete	Complete	Complete	Ongoing	Complete	N/A	6
Municipal By-laws Required (Sewer Use, Connection)	N/A	N/A	N/A	N/A	Complete	N/A	Complete	N/A	3



Source Protection Annual Reporting Summary 2019 - Wellington County municipalities

Reportables	Centre Wellington	Guelph/Eramosa	Mapleton	Puslinch	Wellington North	Erin	Minto	County of Wellington	Total
Tier 3 - Water Quantity Studies	Model Development and Calibration report complete, Risk Assessment report drafted, Threats Management Strategy drafted, Policy approaches and text drafted, public consultation through Community Liaison Group and with stakeholders	Policy approaches final, Policy text drafted and significant discussion and collaboration with project team (including City of Guelph, Provincial Ministries, adjacent municipalities) ongoing public and municipal consultation through Community Liaison Group and Implementing Municipal Group	Model Development and Calibration report complete, Risk Assessment report drafted, Threats Management Strategy drafted, Policy approaches and text drafted, public consultation through Community Liaison Group and with stakeholders	Policy approaches final, Policy text drafted and significant discussion and collaboration with project team (including City of Guelph, Provincial Ministries, adjacent municipalities) ongoing public and municipal consultation through Community Liaison Group and Implementing Municipal Group	N/A	Policy approaches final, Policy text drafted and significant discussion and collaboration with project team (including City of Guelph, Provincial Ministries, adjacent municipalities) ongoing public and municipal consultation through Community Liaison Group and Implementing Municipal Group	N/A	See summaries for local municipalities.	2
Provincial Working Groups / Comments	Staff participated in focus groups and provided written comments on proposed provincial changes to the Clean Water Act Technical Rules and Table of Drinking Water Threats. The Water Quantity Working Group was on hold in 2019.								

Source Protection Annual Reporting Summary 2019 - Wellington County municipalities

Reportables	Centre Wellington	Guelph/Eramosa	Mapleton	Puslinch	Wellington North	Erin	Minto	County of Wellington	Total
Source Protection Plan Amendments and Technical Projects	New Issues Contributing Areas (ICA) for Chloride and TCE delineated. New WHPAs for quality delineated. Policy approaches and text drafted for the chloride ICA. Grand River Section 34 update for policy and technical work. Technical support for Water Supply Master Plan and continued chloride sampling program. Grand River Section 36 work plan completed.	New WHPAs for quality delineated. Grand River Section 34 update for policy and technical work. Technical support and comments for Guelph Water Supply Master Plan. Grand River Section 36 work plan completed.	Grand River Section 34 update for policy and technical work. Grand River Section 36 work plan completed.	Region of Waterloo new WHPAs for quality delineated including separate Grand River Section 34 update. Grand River Section 34 update for policy and technical work. Technical support for Township Water Supply Feasibility Study. Technical support and comments for Guelph Water Supply Master Plan. Grand River Section 36 work plan completed.	Grand River Section 34 update for policy and technical work. Grand River Section 36 work plan completed. Saugeen Section 36 work plan completed.	Grand River Section 34 update for policy and technical work. Technical support for Town Class EA on new Water Supply Wells and Growth Management Strategy. Grand River Section 36 work plan completed.	Maitland Section 36 study for Palmerston WHPA redelineation. Saugeen Section 36 work plan completed.	See summaries for local municipalities.	14
Public Meetings in the Reporting Year	Total number provided County wide, public meetings included public consultation for Source Protection Plan changes, Tier 3 Community Liaison Group, Proponent public meeting and Township Public meeting on water supply system.							4	4
Provincial Reporting (Annual Reports and Grant reports)	2	2	3	4	5	4	5	6	31

**Note:**

a) To date, the focus for RMPs has primarily been on industrial, commercial and institutional properties. Agricultural property verification and RMPs began in 2019 within Erin due to the CTC timelines.

b) Section 34 and Section 36 of the Clean Water Act outline amendment processes for the Source Protection Plans. Section 34 updates, generally, are focused updates related to updated technical work (i.e. new WHPAs) or updates to policies where there have been implementation challenges. Section 36 updates, generally, are broader updates related to changed provincial guidance, policy updates, updated technical work not already covered by a Section 34 updates. Timelines for Section 36 updates vary, however, are generally every 5 years and are preceded by development of a work plan outlining the tasks. Section 34 updates are completed as required.