

May 3, 2016

Honourable Glen Murray
Minister of Environment and Climate Change

Attn: Kathleen Hedley
Environmental Assessment and Approvals Branch
2 St. Clair Ave. W., Floor 12A
Toronto, ON M4V 1L5
Minister.moe@ontario.ca

**Re: City of Greater Sudbury - Notice of Completion and EA for Second Avenue
MR72 Upgrading**

Your office will have received comments from the Greater Sudbury Watershed Alliance and a requested Part II Order for this project from the Minnow Lake Restoration Group. As your office is clearly aware, with the recent provision of \$ 2.3M in funding to undertake several watershed and sub-watershed studies in the City of Greater Sudbury, the public at large is concerned about the City's lack of adequate water resources planning and the resulting degradation of our City's urban lakes.

This specific road re-construction project is located within the Korpela Creek sub-watershed, and is one of several creeks that flows to Ramsey Lake, one of the City's two municipal drinking water supplies. Ramsey Lake has a long history of blue-green algae blooms and, under projected changes in climate, this is public health issue that can be expected to worsen.

Current sampling carried out by Laurentian University show that Korpela Creek is degraded in terms of it's nutrient status for total phosphorus (TP), and is defined as a Policy 2 receiver. TP levels are reported to be 5 to 6 times PWQO.

Based on signage posted along lower reaches of the creek by Fisheries and Oceans Canada, Korpela Creek supports a limited fishery consisting of white suckers and various minnow species, including red-bellied dace.

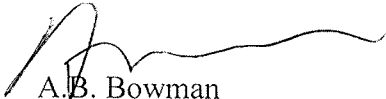
From my review of the City's EA for this project, no provisions for storm water treatment have been made in this project, and the City's approach to this matter has been to defer treatment until some future time after the sub-watershed plan for Ramsey Lake is completed (i.e. approximately 2 years hence).

In that this project will more than double the width of the road right-of-way, a corresponding doubling of storm water runoff is expected and estimates make no allowances for the removal of the current grass ditching which will be replaced by a piping network directed to Korpela Creek.

During the past month, I have made two attempts to contact Senior City staff in an attempt to discuss this matter and have been advised that their position as stated in the EA is unchanged.

I would remind MOECC staff that under the Province's *Water Management Goals, Policies, Objectives, and Implementation Procedures* (Blue Book) that as a Policy 2 receiver, the Ministry (and *de facto* the proponent) will require all reasonable and practical measures to be taken to reduce waste loadings so as to upgrade water quality. This matter would appear to be readily resolved by the inclusion of a condition requiring treatment of the storm water on the ECA for the sewage works that form part of this Scope of Project.

Sincerely



A.B. Bowman
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cc Greater Sudbury Watershed Alliance
Minnow Lake Restoration Group
City of Greater Sudbury, Attn: Tony Cecutti, General Manager of Infrastructure
Services