



May 5th, 2016

The Honourable Glen Murray
Minister of the Environment and Climate Change
135 St. Clair Ave West, First Floor
Toronto, Ontario M4V 1P5
Attention: Kathleen Hedley
Director, Environmental Approvals
EAASIBgen@ontario.ca
minister.moe@ontario.ca

Re: Notice of Completion – Municipal Class Environmental Assessment – Second Avenue (MR72) Infrastructure Improvements. Notice issued April 6, 2016.

Requester Details: The following letter of concern is presented by the Ramsey Lake Stewardship Committee, a grassroots organization focused on improving the health and water quality of Ramsey Lake. Ramsey Lake is a small urban lake in the centre of Greater Sudbury and is a municipal drinking water source for over 60,000 Sudburians. Greater Sudbury Source Protection Plan policies for this lake came into effective April 1, 2015.

Proponent Details: Reference is made to Notice of Completion issued April 7th, 2016 regarding Municipal Class Environmental Assessment 2nd Avenue (MR72) Infrastructure Improvements by the City of Greater Sudbury.

Project Details: It was recommended in this Project File that Second Avenue (a two lane secondary arterial) be widened to five lanes from Donna Drive to Scarlett Road, widened three lanes from Scarlett Road to Kenwood Street and the storm ditches removed.

Concerns: We have a number of concerns about this project as it relates to the quality of stormwater which flows to Ramsey Lake from 2nd Ave.

Blue-Green Algae

According to the Sudbury & District Health Unit, blue-green algae blooms, which produce toxins, have been confirmed in Ramsey Lake in September 2008, August 2010, July 2011, August 2012, and July 2015. Ramsey Lake is not only a municipal drinking water source but it is also a private drinking water source for many residents who are constantly worried about there being toxins in their drinking water.

Phosphorus Inputs

We know high phosphorus levels and warm temperatures are ideal conditions for blue-green algae growth and with climate change and further development slated for the watershed, the situation will likely become more problematic. Although the 15-year spring phosphorus level average for Ramsey Lake is 10.8 µg/L, higher levels of phosphorus have been recorded from stormwater outlets and the stormwater management facility at Korpela Creek (Frobisher Creek). The phosphorus level from this outlet was measured in 2010¹ at

110.5 µg/L, which exceeds the Ontario Provincial Water Quality Objective guidelines of 30 µg/L for protection of streams. We, therefore, have concerns that this stormwater management facility, which will receive even more stormwater from 2nd Ave, is already showing signs that it is unable to perform at the 'Enhanced Level' of phosphorus control required for Ramsey Lake protection and will continue to deteriorate with more stormwater from this new expanded roadway and indeed from more development proposed to the east.

Sodium – Road salt

A wider road will require more salt – sodium is already a Drinking Water Issue in the Ramsey Lake Watershed. The sodium level in Ramsey Lake was measured by the city at 52 mg/L in 2015, which is already over the 20mg/L health unit reportable level.

Green Infrastructure

We are also concerned that, although two Greater Sudbury Source Protection Plan policies² exist to ensure stormwater does not become a significant drinking water threat, no new stormwater management initiatives were considered for this project and existing green infrastructure will be replaced with impermeable asphalt. As the City's Project File section 4.1 *Vegetation* states, these natural vegetation features will be removed:

- Removal of Old Field Cultural Meadow and Cattail Marsh/Thicket Swamp adjacent to Second Ave between Donna Dr. and Scarlett Ave.
- Potential sedimentation and erosion in Cattail Marsh vegetation due to construction activities.
- Removal of Mineral Thicket Swamp vegetation
- Removal of approx. 0.5 hectares of the Poplar-White Birch dry to moderately fresh forest.

Source Protection Plan policy does not say ignore opportunities to improve stormwater quality if a proponent has started a watershed study. The opportunity to improve the quality of stormwater entering Ramsey Lake should be taken when it presents itself. There are many low impact development techniques that could be employed. As well, perhaps the Korpela Creek stormwater management facility should be re-assessed to ensure it is functioning properly and that it is receiving sufficient maintenance to do so.

We hope the MOECC can address the environmental impacts of such a project using the tools and policies at its disposal and that, in future, the proponent notes the new Source Protection policies that are now in place for the Ramsey Lake watershed and treats stormwater quality just as importantly as possible vehicular congestion.

Sincerely,

Lilly Noble
Co-Chair
Ramsey Lake Stewardship Committee
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Sudbury, Ontario

Cc: Clerk, City of Greater Sudbury
Tony Cecutti, General Manager of Infrastructure Services
David Shelsted, Director, Roads and Transportation Services
Rob Rocca, Project Manager

Appendix

1. In the year where data were collected (2010), phosphorus from Frobisher Creek outlet was measured at 110.5 µg/L, (Bradley, J. M.Sc., *Urban and Industrial Drivers of Phytoplankton Communities in Sudbury*, Ontario, Urban Lakes. Laurentian University, Sudbury, ON. Dr. Ramcharan).
2. **Greater Sudbury Source Protection Plan Policies that relate to Stormwater**

Policy S4EF-PI

Where S3F-PI does not apply and where a sewage system (existing and/or future) is in an area where this activity could be a significant drinking water threat, the Ministry of the Environment shall ensure that the Environmental Compliance Approval that governs the sewage system includes appropriate terms and conditions to ensure that:

- a. The sewage system (existing) ceases to be a significant drinking water threat; or*
- b. The sewage system (future) never becomes a significant drinking water threat.*

*This policy applies to all sewage threats, including **stormwater infrastructure**.*

Policy S7F-LUP

The City of Greater Sudbury shall incorporate into its official plan policies related to reducing stormwater runoff volume and pollutant loadings from developments in the vulnerable areas where stormwater management facilities could be a significant threat. These policies shall:

- a. Encourage implementation of a hierarchy of source, lot-level, conveyance and end-of-pipe controls;*
- b. Encourage the implementation of innovative stormwater management measures;*
- c. Consider flexibility in development standards to incorporate alternative community design and stormwater techniques, such as those related to site plan design, lot grading, ditches and curbing, drive way surfaces, and the use of open space as temporary detention ponds; and*
- d. Support implementation of source control programs, which are targeted to existing areas that lack adequate stormwater controls.*

[http://sourcewatersudbury.ca/images/uploaded_files/ApprovedSPP_Sept2014/Greater Sudbury Source Protection Area Approved SPP Sept 19.pdf](http://sourcewatersudbury.ca/images/uploaded_files/ApprovedSPP_Sept2014/Greater_Sudbury_Source_Protection_Area_Approved_SPP_Sept_19.pdf)