



April 21<sup>st</sup>, 2017

**Glen Murray, Minister of the Environment and Climate Change**  
**77 Wellesley Street West – 11<sup>th</sup> Floor – Ferguson Block,**  
**Toronto ON, M7A 2T5. Toronto, ON M7A 2T5 – [MOECCA@ontario.ca](mailto:MOECCA@ontario.ca)**

Dear Minister:

Re: Second Avenue Sudbury – Salt Mitigation Measures – New Information – EA File No. 16054

This correspondence is in reference to the letter of January 20<sup>th</sup> 2017 to Mr. Rob Rocca of the City of Greater Sudbury, which we were copied and is attached. Specifically directives #1 and #2 therein, requiring the city to develop a Risk Management Plan for Second Avenue Infrastructure Improvements with respect to road salt application and additional mitigation measures and best practices to reduce the potential road salt impacts to vulnerable areas as identified in the Greater Sudbury Source Water Protection Plan, specifically Lake Ramsey.

At a recent meeting of Conservation Sudbury (March 30<sup>th</sup>) the draft findings of 2016 Ramsay Lake Flush Samplings were presented showing sodium levels from various storm and surface water inputs to the lake. The findings are attached. Of particular importance, the high levels from the Frobisher input recorded throughout the year. This input involves the watershed that includes Second Avenue.

The significance of sodium in lakes was highlighted in a recent CBC story (April 10<sup>th</sup>) based on a study by 15 researchers, part of the Global Lake Ecological Observatory Network, and published in the Proceedings of the National Academy of Sciences. The study concluded that many lakes are threatened by road salt and that “once road salt is applied to the environment, it’s not removed, it’s either stored in the soil or it’s going to be flushed into nearby streams and rivers and lakes”. The report goes on to state that “saltier lakes can affect the entire water ecosystem, from the fish to the invertebrates they eat to tiny plankton. Salt can also make the lake more susceptible to invasive species and harmful forms of Algae. It takes a lot of salt to kill a lake but a small amount can make it sick”.

Lake Ramsey is not only the major recreational water body in the City of Greater Sudbury but also the source of drinking water for approximately 50,000 residents. Sodium levels have continued to increase over the past several decades from a recorded level of 36mg/L in 1990 to levels consistently above 50mg/L since 2010. Sodium cannot be removed from water by conventional storm water or municipal drinking water treatment measures. Sodium levels greater than 20mg/L are a recognized human health concern.

Taking into consideration historical data and new information there is some question with respect to the ability of the city to adequately address how to reduce the potential road salt impacts to Lake Ramsey

when the Second Avenue project will result in an increase of road surface area from 7,500 square metres to 19,500 square meters and when the level of sodium measured from the storm water outlet (Frobisher) from this portion of the watershed which includes Second Avenue is already at excessively high levels.

Second Avenue is a major secondary artery and is required to be cleared of ice and snow, therefore taking into consideration the increase in road area, it is difficult to see how significant mitigation measures, such as limiting the amount of road salt applied, if even safely possible, can be employed to reduce the amount of sodium contributing to increased levels in Ramsey Lake, except perhaps by more conservative road design to limit surface area and/or traffic mitigation measures.

This is a significant environmental consideration of serious concern and any decision could establish precedence with respect to similar circumstances. We anticipate the Ministry will give this matter the important attention it deserves.

Sincerely,

John Lindsay

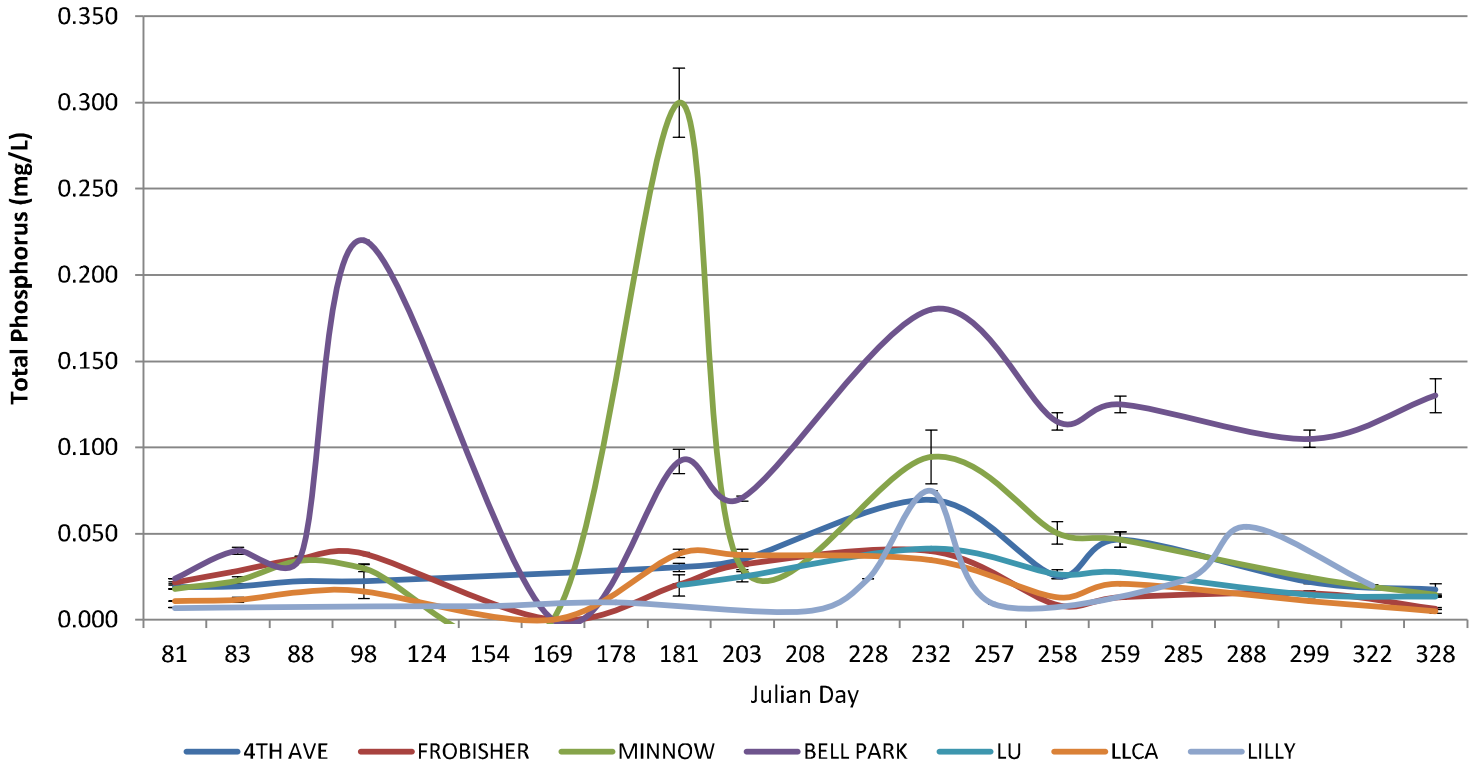
Chair, Minnow Lake Restoration Group in Lake Ramsey Watershed – [www.minnowlake.ca](http://www.minnowlake.ca) 1439  
Bancroft Drive, Sudbury, Ontario. P3B -1R6

Attachments

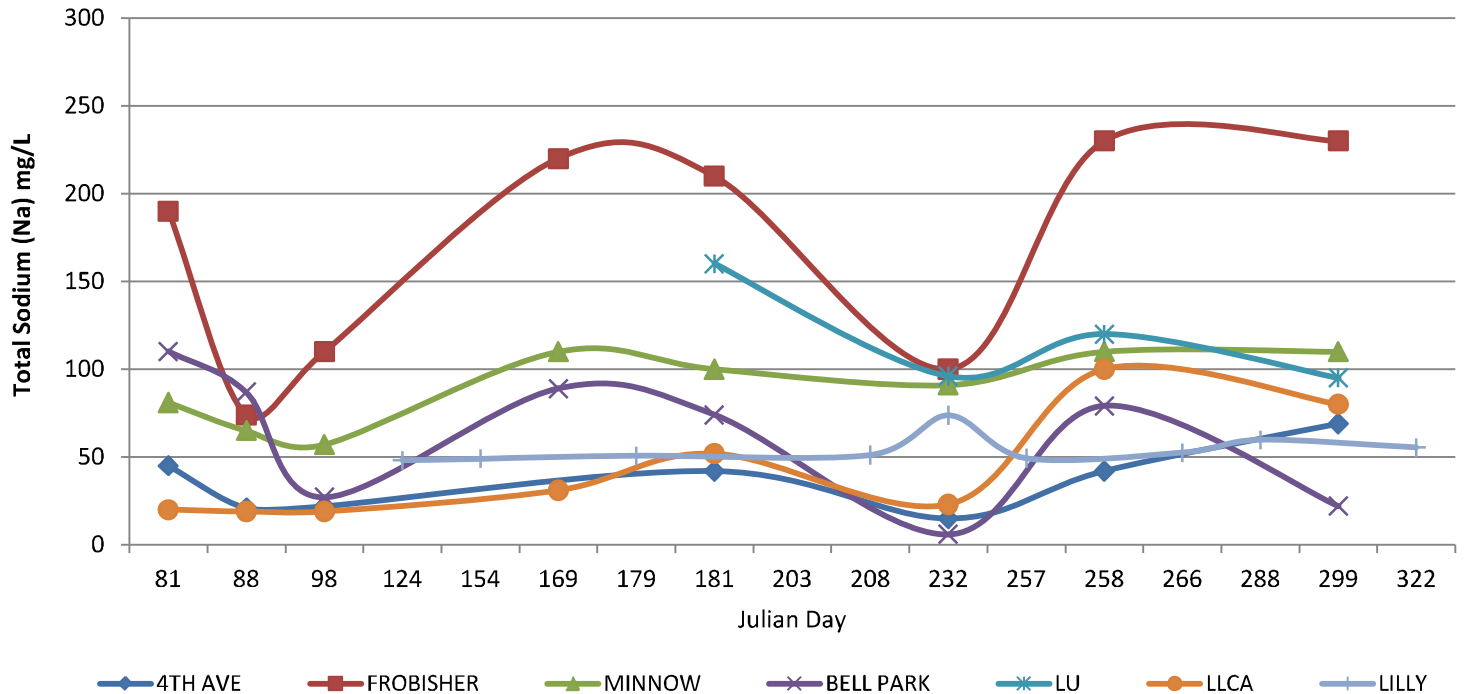
cc: shannon.gauthier.on.ca – [EAASIBgen@ontario.ca](mailto:EAASIBgen@ontario.ca)

# 2016 Ramsey Lake Flush Sampling - DRAFT Findings

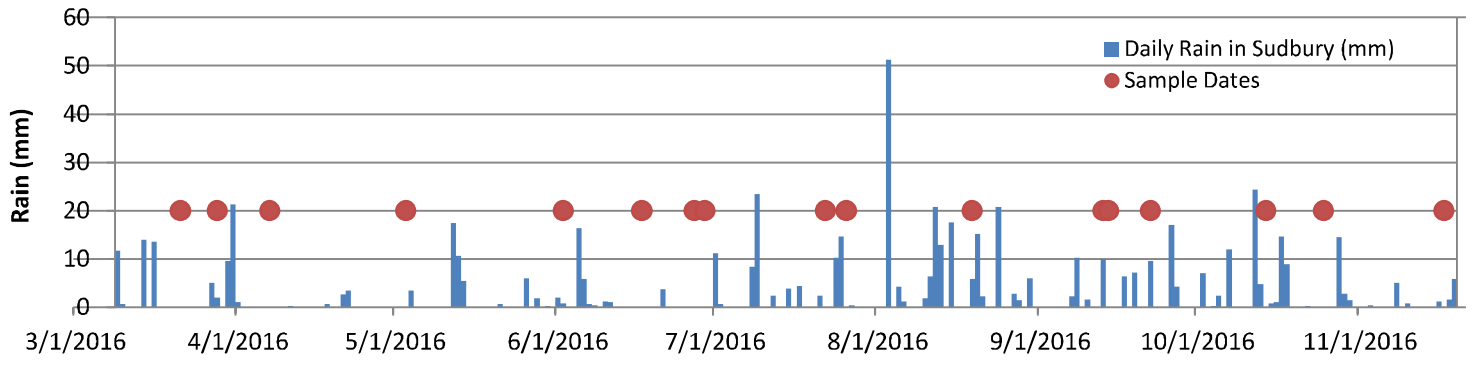
## Total Phosphorus (mg/L)



## Total Sodium (Na) mg/L



# 2016 Ramsey Lake Flush Sampling - DRAFT Findings



Ministry of the Environment  
and Climate Change

Ministère de l'Environnement  
et de l'Action en matière de  
changement climatique



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Log: ENV1283MC-2016-2091

JAN 20 2017

Rob Rocca  
Project Manager  
City of Greater Sudbury  
200 Brady Street  
Sudbury ON P3A 5P3

Dear Mr. Rocca:

Between April 18, 2016 and April 30, 2016, I received seven Part II Order requests asking that the City of Greater Sudbury (City) be required to prepare an individual environmental assessment for the proposed Class Environmental Assessment for Second Avenue Infrastructure Improvements (Project).

I am taking this opportunity to inform you that I have decided that an individual environmental assessment is not required. This decision was made after giving careful consideration to the issues raised in the requests, the Project documentation, the provisions of the Municipal Engineers Association's Municipal Class Environmental Assessment, and other relevant matters required to be considered under subsection 16(4) of the Environmental Assessment Act (Act). The reasons for my decision may be found in the attached letters to the requesters.

Despite my not requiring an individual environmental assessment be prepared, during the review it was noted that there are some concerns regarding road salt and road safety. I am imposing the following conditions on the Project to ensure that road salt is effectively managed and that mitigation measures are considered for pedestrian and traffic safety:

1. During the Project's detail design and operational phases, the City shall consider additional mitigation and best management practices to reduce the potential road salt impacts to vulnerable areas as identified in the Greater Sudbury Source Protection Plan.

2. The City shall create a Risk Management Plan for the Project's road salt application prior to operation.
  - a) The Risk Management Plan for the Project will remain in effect until the City has completed and implemented the Storm Water Management Strategy for the Ramsey Lake issues contributing area, in accordance with the approved Greater Sudbury Source Protection Plan;
  - b) The City shall submit the Project's Risk Management Plan to the Director of the Environmental Approvals Branch prior to the Project's operation.
3. The City shall develop a Traffic Safety Plan for the Project, prior to operation.
  - a) The Traffic Safety Plan shall include traffic and pedestrian safety mitigation measures that consider, but are not limited to:
    - i) Signage
    - ii) Timing of Traffic Signals; and
    - iii) Calming measures (Streetscaping).
  - b) The City must consult with interested persons, including the requesters, on the Traffic Safety Plan prior to finalization.
  - c) The final Traffic Safety Plan shall be posted on the Project website.
  - d) The City shall submit the final Traffic Safety Plan and documentation on consultation to the Director of the Environmental Approvals Branch prior to operation of the Project.
4. Once conditions 1 to 3 have been satisfied, the City shall notify the Director of the Environmental Approvals Branch.

Mr. Rob Rocca  
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With this decision having been made, the City can now proceed with the Project, subject to the conditions imposed. The City must ensure the Project is implemented in the manner it was developed and designed, as set out in the Project documentation, and inclusive of all mitigating measures, and environmental and other provisions therein.

Lastly, I would like to ensure that the City understands that failure to comply with the Act, the provisions of the Class Environmental Assessment, and failure to implement the Project in the manner described in the planning documents, are contraventions of the Act and may result in prosecution under section 38 of the Act.

I am confident that the City recognizes the importance and value of the Act and will ensure that its requirements and those of the Class Environmental Assessment are satisfied.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glen Murray', with a long horizontal flourish extending to the right.

Glen Murray  
Minister of the Environment and Climate Change

Attachment

c: Requesters

EA File No. 16054  
Second Avenue Infrastructure Improvements (Sudbury)