

From: Muriel Kim-Brisson <mkim@blumetric.ca>

Sent: April 25, 2025 9:49 AM

To: Mark Kluge <mkluge@townofgrandvalley.ca>

Cc: Tiffany Svensson <tsvensson@blumetric.ca>

Subject: RE: Notice Of Public Meeting Proposed Official Plan Amendment & Zoning By-Law Amendment
Town of Grand Valley

Hi Mark,

We took a closer look at the text within the Official Plan and Zoning By-Law and noticed some inaccuracies that we wanted to bring to your attention. These were not spotted before because the focus was on making sure that the mapping was correctly updated to include the newest well and its WHPAs, which they are.

Namely, the Official Plan and ZBL have some inaccurate details with respect to the GRSPA Source Protection Plan. For example, Section 5.2.2.4.5 of the OP lists a bunch of activities that are apparently prohibited in a WHPA 10, when they are actually not:

- Handling and storage and application of commercial fertilizer and pesticide (prohibition applies only to *future* handling and storage of commercial fertilizer and pesticides)
- Use of land as livestock grazing, or pasturing land, an outdoor confinement area or farm animal yard (would be subject to an RMP rather than being prohibited)
- Future handling and storage of road salt (prohibition only applies to future handling and storage of road salt in WHPA-A (just requires an RMP in WHPA-B (10))
- Future handling and storage of fuel more than 2,500 L (prohibition applies specifically to WHPA-A; WHPA-B (10) would just require an RMP).

The prohibition list in the OP is also not complete. It's missing the prohibition against future handling and storage of DNAPLs in WHPA 10, for instance.

Section 2.9 of the ZBL similarly lists activities that are apparently prohibited in WHPA-A, WHPA-B and WHPA-C, but are actually not. I didn't cross-reference every single item, but some inaccuracies I spotted include:

- Handling and storage of fuel more than 2,500 L is listed in the ZBL as prohibited in WHPA-A (it's only prohibited in future circumstances, but not existing)
- Salt storage is listed as prohibited in WHPA-A (it's only prohibited in future circumstances, but not existing)
- Salt storage is listed as prohibited in WHPA-B (10) (it's not actually prohibited at all)

Maybe the text in the OP and ZBL originally reflected an older version of the Source Protection Plan, but in any case, we thought it may be best to address the issue now, during the review of both documents. Perhaps the best approach is to use more generic text in order to "future-proof" the documents against future changes to the Director's Technical Rules and to the Source Protection Plan. The Township of Centre Wellington uses this approach of using generic text (a snippet from their [Official Plan](#) is pasted below).

4.9.5.3 Land Use & Activity Prohibitions, Regulations, and Restrictions within Vulnerable Areas

Significant drinking water threats within *vulnerable* areas are either prohibited or regulated by Source Protection Plan policies. The significance of a prescribed *drinking water threat* depends on the characteristics of the *activity* and where the *activity* is occurring within a *vulnerable* area. Appendix 4 to this Plan identifies where Source Protection Plans apply within the County of Wellington.

Notwithstanding the land uses permitted by the underlying land use designation in this Official Plan:

- a) permitted land uses that involve a *significant drinking water threat* within a *vulnerable* area identified in Schedule C to this Plan may be either prohibited or regulated by the applicable Source Protection Plan.

Let us know if you would like to consider revising the OP and ZBL to include more generic wording about source water protection. We'd be happy to assist as needed.

Thank you,
Muriel



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