



Wednesday, June 16, 2021

The Honourable Jeff Yurek
Minister of the Environment, Conservation and Parks
Ontario Ministry of the Environment, Conservation and Parks (MECP)
135 St. Clair Avenue West, 1st Floor,
Toronto, ON M4V 1P5

Dear Minister Yurek,

RE: City of Guelph Comments on Triton Water Canada (formerly Nestle Water Canada) Permit to Take Water Renewal Application (ERO #019-3531, Ministry Reference Number: 3572-A8XGCE)

The City of Guelph (City) appreciates the opportunity to comment on the Triton Water Canada (formerly Nestle Water Canada) Permit to Take Water (PTTW) Renewal Application (the "Proposal").

Triton Water Canada proposes to renew the existing PTTW No. 1381-95ATPY for the taking of water from an existing water supply well. Details from the application are found [here on the Environmental Registry of Ontario's website](#).

The Triton Well, TW3-80, is located in Aberfoyle, in the Township of Puslinch, and lies approximately 3.2 km from the southern boundary of the City of Guelph. The well was constructed in 1980 and was purchased by Nestlé in 2000. The well draws water from the bedrock aquifer, the same aquifer used by the City for its water supply.

The existing PTTW contains a number of terms and conditions under which the well is allowed to operate. The permit conditions for impact monitoring are extensive and include a number of bedrock and overburden monitoring wells, private wells, surface water levels, surface water flows, sediment-water interface temperature monitoring, wetland monitoring and fish spawning surveys. Monitoring data are provided to the MECP in annual reports prepared by a Professional Geoscientist or qualified Professional Engineer and a qualified surface water scientist. Triton has made these reports available to the public and, with each report, holds a public meeting to present the results of the reports.

With reference to this proposal, City staff offer the technical comments found below on the proposed PTTW renewal application by Triton Water Canada. Based on the results of several technical studies, City staff do not have concerns with the sustainability of the proposed Triton PTTW under current conditions. However, it is possible that this proposed water taking may conflict with the City's future potential water supply needs as Guelph continues to grow and requires additional water wells to meet community demand. For this reason, the City strongly recommends a 5-year renewal term, instead of a 10-year period. Requiring a new PTTW application

for the Triton Well in 5 years would allow for the timely consideration of future potential municipal supply wells.

Sustainability of Proposed Taking

The City; Wellington County, as the municipality responsible for source protection in Puslinch Township; the Grand River Conservation Areas (GRCA), as the Source Protection Authority; and the MECP, as the regulatory authority; have completed a Tier 3 Risk Assessment (Tier 3 RA) for the water supplies of Guelph and Guelph Eramosa Township (GET) under the requirements of the Clean Water Act. The Tier 3 RA included a water budget analysis of the areas surrounding Guelph and GET to compare available groundwater and surface water supply to the demand for existing, future and planned drinking water systems. Where the ratio of water demand to water supply is high, sub-watersheds are classified as having a Moderate or Significant potential for water quantity stress. For the local area around the City, the stress level was determined to be Significant, meaning a significant percentage of the available groundwater is used for water takings.

The process for the Tier 3 RA was defined in Technical Rules provided by the MECP and was conducted using three-dimensional integrated groundwater and surface water flow computer models of a large area surrounding Guelph and GET. The groundwater-surface water models were used to assess the availability of water supply under a number of scenarios including existing conditions, future demand, future land development and drought conditions. The Tier 3 RA and the groundwater surface water models provide a sound technical basis for the development of water resources management plans to ensure quantity, protection and preservation of our resources for a sustainable municipal water supply.

In late 2017, the MECP asked that the City share analysis of the Tier 3 model with Nestlé because it is tested and includes the best available information. By sharing analysis from the City's model and running it with additional data from Nestlé, the City could ensure that Nestlé is using the best available science to analyze potential impacts of their current and future water taking as requested in PTTW applications. In February 2018, the City entered into an agreement with Nestle to use the City groundwater flow model in a comprehensive study to evaluate the water taking. The City's groundwater flow model was then updated using Nestle's data and information from their wells and monitoring programs. The latest modelling results from this agreement indicate that increasing the pumping rates at the Triton well from current rates to permitted rates will not affect groundwater levels at the closest City of Guelph municipal well (Burke Well).

Based on current day water taking monitoring results, reporting and Tier 3 RA modelling, City staff do not have concerns with the sustainability of the proposed Triton PTTW under current conditions.

As a permitted water taker in the study area for the Tier 3 RA, Triton will be subject to current risk management measures as well as potentially subject to the water quantity policies to be developed for the area's Source Protection Plan. It is the City's expectation that, since Triton is a water taker in the study area, there will be opportunities for the City, County, GET, the GRCA, the MECP and Triton to work together to develop appropriate risk management measures moving forward. This



will enable the effective management of local water resources to ensure sustainable water taking in the study area. It is expected that the current water taking by Triton can be managed to ensure that the potential impacts on Guelph and the surrounding communities, now and in the future, do not exacerbate the potential risk as determined in the Tier 3 RA.

Guelph's Future Water Demand Considerations

As part of the City's Municipal Comprehensive Review process, an update of the City's Water Supply Master Plan (WSMP) is currently underway to define preferred servicing alternatives to meet 2051 local provincial growth directives arising out of Places to Grow. This update will be completed in late 2021.

Through the last update of the Water Supply Master Plan in 2014, one of the proposed options to supplement the City's future water supply is a potential new water supply well ("Guelph South Well") located near the southwest corner of the city in the Hanlon Creek Business Park. This well is a potential future water source as determined from groundwater modelling, and subject to agreement from the Township and County and further investigations and environmental assessments. The well, if it is developed, could conflict with Triton's water taking.

As such, future renewals of industrial water takings in the area should be weighed against the broader needs of the community and the potential risk that available supply may not meet future demand. This could mean that continued water takings may not be sustainable without proper management of the resource. To that end, City staff would recommend a 5-year renewal term period only, rather than a 10-year term, so that this and other new municipal supply wells can be considered in future renewal applications.

The City appreciates the opportunity to provide comment and would be happy to answer any questions the MECP may have as it considers this proposal.

Sincerely,

Jennifer Rose, General Manager

Environmental Services, **Infrastructure, Development and Enterprise**

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