

APPENDIX F1

COMMENTS AND RESPONSES

LAKE KASHAGAWIGAMOG ASSOCIATION

Lake Kashagawigamog
Association
229 Yorkmills Road
Don Mills, Ontario
M2L 1L2

Honourable James Bradley
Minister of the Environment
135 St. Clair Avenue W.
Toronto, Ontario
M4V 1P5

September 5, 1989

Dear Mr. Bradley:

Re Expansion Of Haliburton Sewage
Treatment Plant
Ministry Of The Environment
Project No. 3-0706

Our Association which represents over 250 family members, was formed this year, primarily in response to our concern about the deteriorating water quality of the Lake Kashagawigamog chain. During the course of the summer we have been trying to educate ourselves about water pollution, so that as a group, we can take action to help clean-up our waters.

As a part of our educational process we have been closely monitoring the details regarding the proposed expansion of the Haliburton sewage treatment plant. Our research on this subject has been extensive. We have contacted various representatives from your Ministry on several occasions. A number of us attended the information session on the proposal, conducted by Totten Sims Hubicki Associates. We have read with interest the many articles about the proposal in our community papers. Recently we have had the opportunity to peruse the Class Environmental Assessment Report on phases one and two and have sought the comments from two Engineers regarding same.

As a result of this research we are gravely concerned about this proposed expansion of the sewage treatment plant. Our concerns stem from the following:

- 1) The impacts of the expansion are really not known. Models and assumptions are used to predict the affect on our Lake chain rather than hard data. We are fortunate to have a history on the water quality of our Lake, thanks to the Secchi Disc. - Chlorophyll a Self-Help Program. The results show that there has been a deterioration in water quality since the early 1970's and that there is in fact a positive correlation between the installation of the existing sewage

treatment plant and the deterioration of the water quality in the Lake chain. Attached is a copy of a letter previously addressed to you from Mr. Kevin Walters P. Eng outlining this data in detail. The consulting Engineers, Tottem Sims Hubicki Associates, do not appear to recognize this data. We think it is too important to ignore.

2) There are no assurances given to us by the consultants that the expansion of the plant will not harm our Lake chain. The Class Environmental Assessment report is full of phrases such as "it is anticipated that Policy 2, no further degradation can be met" (9-40) or "the replacement of faulty septic systems with sanitary sewers could result in improved water quality (8-13)".

3) The North Basin of Lake Kashagawigamog has been designated a Policy 2 water body by your Ministry. The policy states that "where a new or expanded discharges are proposed no further degradation will be permitted and all practical measures should be undertaken to upgrade water quality." The expansion of the Haliburton sewage treatment plant appears to be in conflict with this policy as there will be an increase in phosphorus loading and feasible technical alternatives to avoid this are not properly addressed. The proposed expansion of the sewage treatment would also increase the phosphorus loading to Grass Lake per Table 9.7 of the report. The water quality of Grass Lake is currently unacceptable to the residents of this lake. Any further degradation is totally unacceptable.

4) No attempt has been made to consider the direct impact of installation of the sewer along Highway 121 with the concern for the objectionable nature of "strip development" and as the installation is included in the preferred alternative, the preferred alternative is not properly addressed.

5) No attempt has been made to consider the total impact of development on the area and therefore the "do nothing" alternative is not properly addressed.

6) The North Basin of Lake Kashagawigamog and Grass Lake are periodically anoxic. This should be considered when predicting the impacts of the expansion of the sewage treatment plant.

7) The Ministry of Natural Resources has raised concerns about the potential impacts on fisheries due to expansion of the sewage treatment plant in Haliburton. We very much share these concerns.

9) The Ministry of Environment Central Region has stated that a maximum phosphorus loading of 160 kg. per annum would be permitted from the upgraded sewage treatment plant. Under the preferred alternative, the proposed effluent criteria

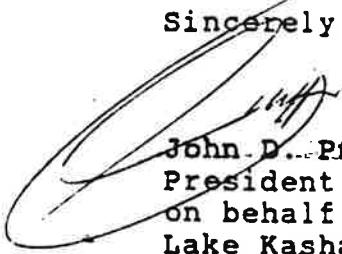
for the expanded Haliburton sewage treatment plant is .3mg./L for phosphorus. As this would result in a phosphorus loading of 211.7 kg. per year, the requirement of your Ministry would not be met.

Having considered all of the facts available to us and having knowledge of the very environmentally sensitive nature of our Lake chain, we feel that it would be a serious error in judgement to proceed with the expansion of the Haliburton sewage treatment plant as recommended in the Class Environmental Report and without further study.

At a meeting of the Lake Kashagawigamog Association held on September 2, 1989 it was unanimously resolved that the Association request an Individual Environmental Assessment. As well, 130 individuals have signed a petition to this effect and we enclose same for your records.

We hereby request that an Individual Environmental Assessment be conducted, to further study the long term affects of this proposal on our unique Lake chain. We ask that this assessment be carried out as expeditiously as possible in consideration of the beneficiaries of the expanded plant and in this regard offer our assistance.

Sincerely :


John D. Puffer

President - Lake Kashagawigamog Association
on behalf of the:

Lake Kashagawigamog Association (soon to be incorporated)

PETITION OF the HAWTHORNE SLAUGHTER PLANT ET AL. v. SIC

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawicamog Association.

PETITION TO THE MARYBOROUGH SEWAGE TREATMENT PLANT AUTHORITY

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBURTON SEWAGE TREATMENT PLANT EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBUTTON SEWAGE TREATMENT PLANT INCORPORATION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBURTON SEWAGE TREATMENT PLANT EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawicamog Association.

PETITION TO THE HALIFAX SEWAGE TREATMENT PLANT BOARD FOR

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBURTON SEWAGE TREATMENT PLANT EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBURTON SEWAGE TREATMENT PLANT EXPENSES

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION to the HALIBURTON SEWAGE TREATMENT PLANT EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

PETITION re the HALIBUTON SEWAGE TREATMENT PLANT EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawicamog Association.

PETITION to the HALIFAX CITY COUNCIL for an EXPANSION

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagaw-gamog Association.

PITMEGAN THE KING HAMILTON SWIMMING POOL AND BATHS.

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.

LETTER TO THE MILBURNTON STAGE CO. AGENT, PLATTSBURGH.

We, the undersigned, request a "bump up" from a Class Environmental Assessment to an Individual Environmental Assessment for the reasons given in the covering letter from the Lake Kashagawigamog Association.



RECEIVED

OCT 6 1989

Office of the
Minister

Ministry
of the
Environment

TOTTEN SIMS HUBICKI ASSOCIATES
WHITBY, ONTARIO

135 St. Clair Avenue West
Toronto, Ontario
M4V 1P5
416/323-4359

09M0701

OCT 0 4 1989

OPY

Mr. John D. Puffer
President
Lake Kashagawigamog
Association
229 Yorkmills Road
Don Mills, Ontario
M2L 1L2

Dear Mr. Puffer:

Thank you for your recent letter expressing the concerns of the Lake Kashagawigamog Association with the expansion of the Haliburton Sewage Treatment Plant proposed by the Township of Dysart et al.

It is premature to decide on the need for an individual environmental assessment as the municipality is still planning.

The planning process outlined in the Class Environmental Assessment for Municipal Sewage and Water Projects (Class EA) requires that the municipality provide at least three opportunities for public and government agency input. The last opportunity is at the completion of planning a project. At that point, an Environmental Study Report (ESR) must be prepared detailing the municipality's planning, the reasons for selecting a preferred alternative and any mitigation measures proposed. I have been advised that an ESR for this project will be completed by mid-October 1989. The ESR must be placed with the Municipal Clerk for 30 days. Then, you may review the report and raise any concerns you feel the municipality has not addressed.

Mr. John D. Puffer
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If you believe your concerns have still not been adequately resolved, you may request that the project be "bumped-up" to an individual environmental assessment.

I encourage you to participate in all forums provided by the municipality, and make your concerns known. I expect municipal staff to work with you to resolve outstanding issues. Mr. Robert Winson, (416) 440-3482, is available to provide you with detailed help.

I thank you for your interest in protecting Ontario's environment.

Sincerely yours,

Original signed by Minister

Jim Bradley
Minister

cc: Dr. Philip Byer
Chairman
Environmental Assessment
Advisory Committee

Mrs. D.L. McCallum
Township of Dysart et al.

Mr. R. Baker
Totten Sims Hubicki Associates

HALIBURTON SEWAGE TREATMENT PLANT EXPANSION
CLASS ENVIRONMENTAL ASSESSMENT PHASE I AND II REPORTS
MOE PROJECT #3-0706

E. Reply to Comments by John D. Puffer dated 5 September 1988 (Exhibit E)

E.1

Obviously, one cannot measure an impact with hard data prior to expansion of the sewage treatment plant. This is precisely why one relies on proven models to forecast the impact. We have commented on the letter supplied by Mr. Kevin Walters dated 23 May 1989 separately and refer you to that response regarding the data collected on the Cottager's Self Help Program. It is noteworthy, that the north basin of Kashagawigamog Lake, which is expected to be the most affected by the effluent from the sewage treatment plant, is least influenced according to the reported secchi disk and chlorophyll-a data. Unfortunately corresponding data are not available on total phosphorus, which is the best indicator of the nutrient load to the lake. We do not concur with Mr. Walter's assessment of the trophic status of Kashagawigamog and Canning Lakes.

E.2

The purpose of a sewage treatment plant is to reduce the nutrient load to a receiving water body. There is no doubt, that a well operated conventional sewage treatment plant is more efficient in this regard than septic tank systems. The actual performance of any system is dependent on the attention given to it by the owner/operator. The fact that qualifiers are used in the report mainly reflects the fact that the consultant is not in a position to assure absolute compliance.

E.3

It should be reiterated, that the net load of phosphorus to the lakes does not increase with plant expansion. In fact the Ministry of the Environment have stipulated that the allowable loading will not exceed 160 kg/yr based on this criteria. The discharge of the sewage treatment effluent to Grass Lake is only one alternative although it is the preferred alternative from a cost

viewpoint. Current problems in Grass Lake are certainly not due to the effluent discharge from the existing sewage treatment plant. As indicated in the report, the effluent total phosphorus load from the treatment plant represents only about 5.7% of the total estimated load from all sources.

E.4

Objections to strip development along Highway 121 is an issue that is outside the terms of reference for this study. The direct impact of sewer main construction has been addressed. The sewer main would be required with the preferred alternative regardless of the strip development if the lodges are to be connected to the system.

E.5

The impact of development without the expansion of the sewage treatment plant has been addressed. Undoubtedly, the impact would be adverse for the entire lake system should development occur without expansion of the treatment plant. This would not be a feasible alternative.

E.6

The anoxic conditions in both Grass Lake and Kashagawigamog Lake have been addressed. Grass Lake becomes anoxic routinely, while Kashagawigamog Lake goes anoxic at certain locations only during later summer stratification. These conditions are due to benthic oxygen demands coupled with relatively shallow hypolimnetic depths rather than nutrient loadings. The predicted affects on the dissolved oxygen levels on the lakes are addressed in the report and show no significant change.

E.7

The concerns raised by the Ministry of Natural Resources are reflected in the fact that the north basin of Kashagawigamog Lake has been classified by the Ministry of the Environment as a Policy 2 water body. The assessment of impact on lake water quality has taken this factor into account.

E.8

There is some misunderstanding about the 160 kg annual phosphorus load. This figure represents the amount returned to the receiving water in the sewage treatment plant effluent. A significantly greater amount is removed from the sewage at the plant. The Ministry of the Environment has stipulated that the plant effluent will meet the criteria of 0.2 mg/L and the analysis has been carried out based on this criterion being met.