



Greater Sudbury Watershed Alliance

April 25, 2015

**Honourable Glen Murray
Minister of the Environment and Climate Change
Att. Kathleen Hedley
Environmental Assessment and Approvals Branch
2 St. Clair Ave. W. Floor 12 A
Toronto ON M4V 1L5
Minister.moe@ontario.ca**

Dear Minister Murray,

The Greater Sudbury Watershed Alliance is an association of 17 lake, river and creek stewardship groups within the City of Greater Sudbury. We work on a number of goals, one of which is to support the goals and help resolve the challenges faced by our membership, and to work towards improved storm water management within the City of Greater Sudbury.

This letter is in response to the Notice of Completion April 1 2015 and Environmental Report regarding the Municipal Class Environmental Assessment for the Second Avenue MR72 Infrastructure Improvements.

Our concern is for the impact of storm water from this project on Ramsey Lake, a significant source of municipal drinking water.

The increased surface area of the new roadway will more than triple the amount of surface (storm) water entering into the storm water drainage system in the Ramsey Lake Watershed. Presently, open ditches service some of this area and provide for a level of natural filtration and infiltration of runoff. In the proposed extension of the original project, ditches would be replaced by underground pipes leading directly to Ramsey Lake, thus reducing natural filtration.

Most stormwater would flow into Frobisher Creek and subsequently into Ramsey Lake. Of concern are the phosphorus outflows from this creek, which has already been demonstrated to be a source of high

levels of phosphorus for the lake. Ramsey Lake has already experienced frequent blue-green algae blooms so that phosphorus has become a Drinking Water Issue according to the Greater Sudbury Source Protection Plan. (In effect April 1, 2015)

Our member groups, the Minnow Lake Restoration Group and the Ramsey Lake Stewardship Committee, report that the City of Greater Sudbury has no plans to incorporate any new stormwater treatment or management system that would prevent or, at least, reduce increased loadings of phosphorus and other pollutants such as salt, total suspended solids and heavy metals.

The Greater Sudbury Watershed Alliance has met with City of Greater Sudbury personnel who have said that storm water management will occur once a Watershed Study of Ramsey Lake has been completed; however, this study is still only in the planning stages. We believe that storm water management should be a top priority, not something that happens after the fact. Ramsey Lake is, after all, a source for 40 percent of the city's drinking water and, thus, we should be using the precautionary principle when building around the lake.

The Greater Sudbury Watershed Alliance, therefore, requests that the Minister issue a Part II Order to elevate the Environmental Assessment to an Individual Environmental Assessment to ensure that adequate stormwater management has been incorporated into the project, and that the waters of Ramsey Lake are protected.

The Minnow Lake Restoration Group has requested a Part II Order to address several environmental issues with the planned project, and we are in support of their submission.

Sincerely

A handwritten signature in cursive script that reads "Lesley Flowers".

Lesley Flowers, Chair

Greater Sudbury Watershed Alliance Inc.

403 Flowers Rd. Whitefish ON P0M 3E0

Cc: Mayor and Council, City of Greater Sudbury

Manager of Infrastructure, City of Greater Sudbury