



## Greater Sudbury Watershed Alliance

18 January 2018

City of Greater Sudbury Planning Committee:

Councillor Deb McIntosh, Chair  
Councillor Rene Lapierre, Vice-Chair  
Councillor Mike Jakubo  
Councillor Joscelyne Landry-Altman  
Councillor Al Sizer

Re: Request for Decision – 1916596 Ontario Ltd. – Applications for Official Plan Amendment and Rezoning to permit a place of amusement in the form of a casino, Kingsway, Sudbury  
Application Files: 751-6-17-24, 701-6-17-9 and 751-6-17-27

Dear Members of the Planning Committee:

The Greater Sudbury Watershed Alliance (GSWA) is incorporated as a not-for profit volunteer organization of 17 lake, creek and river stewardship groups, working to protect the watersheds located within the City of Greater Sudbury. We appreciate the opportunity to comment on the above noted applications.

GSWA supports the City's Official Plan, Section 8.3, with respect to Drinking Water Resources, particularly the emphasis on *"identifying sensitive features of the City's drinking water resources, as well as identifying measures required to protect, improve or restore these resources"*<sup>1</sup>.

Our particular concern with respect to the above noted applications is the establishment of large hard surface parking areas within the Ramsey Lake Watershed, the source of drinking water for over 50,000 City residents. Such a large parking area will require winter maintenance that will undoubtedly result in a significant increase in sodium and chloride concentrations in Ramsey Lake, which has already increased by approximately 60 percent since 1990<sup>2</sup>.

Greater Sudbury Source Protection Area Assessment Report

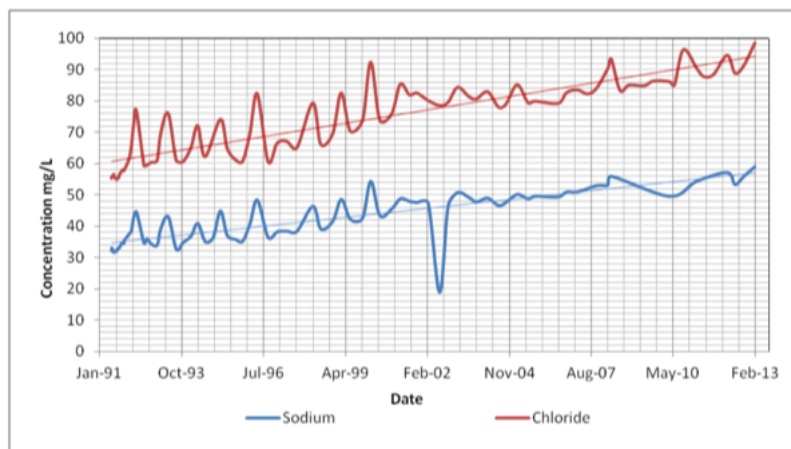


Figure 3.3 – Sodium and chloride levels in Ramsey Lake from 1991 to 2013

Sodium levels are currently at almost three times the 20 mg/L provincial level of concern for those on salt restricted diets, and chloride is quickly approaching 120 mg/L, a level that can harm aquatic life.

It should be noted that traditional storm water treatment measures, including holding ponds and oil and grit separators, do not remove salt or prevent it from entering into the Lake. There is also no cost-effective means of removing sodium from drinking water sources, and likewise few cost-effective alternatives to road salt.

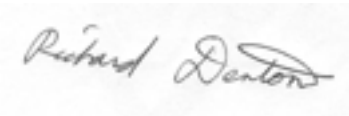
With a projection of over 2000 parking areas, GSWA expresses its concerns for an already compromised watershed.

At a very minimum, to protect Ramsey Lake from increased road salt contamination, GSWA recommends incorporating the techniques recommended for the Lake Simcoe Watershed<sup>3</sup>, such as:

**Parking areas utilize vegetated swales, effective grading and stormwater collection, permeable road/parking/sidewalk surfaces, conductive paving on walkways and entrances, alternate snow pile storage location, and any other effective development and maintenance techniques resulting in environmentally friendly snow and ice control.**

Thank you for your consideration of this important issue.

Respectfully,



Richard Denton  
Chair, Greater Sudbury Watershed Alliance  
Chair@GSWA.ca

Cc: City Clerk – Clerks@GreaterSudbury.ca

---

<sup>1</sup> The City of Greater Sudbury Official Plan, Planning Services Division, Growth and Development Department, City of Greater Sudbury. P-74

<sup>2</sup> [http://www.sourcewatersudbury.ca/images/uploaded\\_files/AR\\_March2017/AR\\_Part-3\\_Feb2017.pdf](http://www.sourcewatersudbury.ca/images/uploaded_files/AR_March2017/AR_Part-3_Feb2017.pdf)

<sup>3</sup> [Parking Lot Design Guidelines to Promote Salt Reduction, Lake Simcoe Region Conservation Authority.](#)