

**Re:** Special Council Meeting June 16<sup>th</sup> to review KED – Lack of consideration of location of development that would threaten Lake Ramsey water quality as revealed and described in Ramsey Lake Subwatershed Study commissioned by City Council and provincially funded: Access link:

<https://www.greatersudbury.ca/live/environment-and-sustainability1/lake-health/watershed-study/>

The study was referenced and commented on by Greater Sudbury water environmental groups with quotes below from these organizations which can be accessed at: <http://gswa.ca/wp-content/uploads/2020/05/Ramsey-Watershed-Study-Submissions.pdf>

### **Greater Sudbury Watershed Alliance (GSA)**

“Will this Subwatershed Study finally convince City Council to pass urban development bylaws that protect this drinking water source? We remain somewhat doubtful, especially since the planned new developments (i.e., Kingsway Entertainment District - KED) in the Ramsey Lake subwatershed will continue to further diminish Ramsey Lake water quality on a regular basis. The Subwatershed Study states that “the primary objective of the groundwater management plan for the Ramsey Lake watershed should be on the preservation of groundwater recharge within the Significant Groundwater Recharge Area (SGRA) zones. The SGRA zones provide baseflow support for the riparian zones as well as storm flow runoff attenuation. The Study emphasizes the importance of preserving groundwater recharge within a SGRA zone and the requirement of significant buffers around the zone to preserve its integrity. Unfortunately, the recently approved KED project will be built not only on the buffer surrounding an SGRA zone but some of it will be constructed overtop of the SGRA zone (figure 8.4). Much of the area will become impermeable with newly constructed parking lots and buildings even though “maintaining infiltration in SGRAs ... is essential for the ecological health of the stream systems.” Why is the City permitting development in this area? Will the KED project be required to meet the important new site-specific stormwater policies identified in the Subwatershed Study for new development?”

### **Minnow Lake Restoration Group (MLRG)**

From the study” “Significant change in runoff and recharge is predicted to occur in and around the wetlands north of Frobisher Creek. “In general, land development increases runoff, and in a significant portion of the watershed area northeast of Highway 17. Further, the proposed Kingsway development, including a new arena, hotel and casino, is planned to cover a portion of the SGRA zone located at the headwaters of Eugene Creek” “The northeast portion of the watershed, including the Frobisher, Rogers and Eugene Creeks and the surrounding SGRA zones, may exhibit measurable impact under future land use in the Kingsway development area. Based on the figures provided with respect to those areas of low permeability the construction of holding ponds and buffer areas as suggested would be problematic from a both a practical as well as financial standpoint as would be “end of pipe” solutions”

### **Coalition for a Livable Sudbury**

The study identifies some specific areas that are zoned for development, where development could clearly be harmful. The most obvious example of this is the protection of Significant Groundwater Recharge Areas (SGRA). The study states, “the primary objective of the groundwater management plan for the Ramsey Lake watershed should be on the preservation of groundwater recharge within the SGRA zones.” A recharge area is considered significant when it helps maintain the water level in an aquifer that supplies a community with drinking water. Significant Groundwater Recharge Areas in the Ramsey Lake subwatershed maintain water levels in Ramsey Lake, important not only for a main source of drinking water, but also for swimming, fishing, boating, shoreline habitat and spawning, and lakeside enjoyment and property values. An obvious recommendation to meet the objective of protection of groundwater recharge within the SGRA zones in the Ramsey Lake subwatershed would be to maintain SGRA’s in a natural state (with wetlands and vegetation). Instead, the study is limited to existing land use designations. The proposed Kingsway development (KED)

would cover a portion of the Significant Groundwater Recharge Area, and have a negative impact, producing “complex changes to the water budget.” According to this study, impacts could include reduced groundwater infiltration, increased run-off, ecological impacts, and decreased water quality (e.g. from road salt run-off from the proposed parking area).

### **Vermilion River Stewardship (VRS)**

“The MP was based on stormwater criteria and design and capacity standards from the Official Plan Stormwater Background Study (City of Great Sudbury, January 2006). However, climate change has advanced significantly over the last 14 years and will continue to advance and increase in intensity unless a miracle happens, and the world gets a handle on it. In fact, a climate study should have been done before any of the subwatershed studies were undertaken, to help predict how climate change will impact on the entire Sudbury District over the next 40 or 50 years”.

“The MP reports that a primary objective is to protect groundwater, and yet a significant groundwater recharge area will be placed at high risk from runoff of road salt and other contaminants from the proposed Kingsway Entertainment District (KED) development.”

### **Conclusion and recommendation:**

Water is our most important resource. We would expect our elected representatives to take any and all actions possible to protect our waterbodies, especially those that provide drinking water, and not give preference to development that could irreparably harm these resources as cautioned in the referenced City commissioned and Provincially funded Ramsey Lake Subwatershed Study.

The situation with respect to Lake Ramsey is most critical with salt (sodium and chloride) already at levels sufficient to cause harm to both human and aquatic life. Everything must be done to ensure these levels do not increase further including the limiting the use of salt on roadways and parking areas (the main sources of runoff) and not allowing the creation or widening of roadways in the watershed and large parking areas.

The KED is proposed to be developed as described in the Ramsey Lake Subwatershed Study in an area that could cause harm to the Lake and as revealed in the study “construction of holding ponds and buffer areas as suggested would be problematic from a both a practical as well as financial standpoint as would be “end of pipe” solutions” In other words there is no realistic solution. It is not a viable location for any development requiring a large parking area.

The obvious response to these concerns and observations would be to determine a location for a development such as the KED outside of an area that would pose a threat to a sensitive water body, in this case Ramsey Lake, drinking water source for over 50,000 residents and a major recreational body of water. The illustration below is from the Ramsey Lake Subwatershed Study and Master Plan and shows quite clearly the subject area of concern:

This study by independent and objective expert consultants deserves careful consideration as water is our most important resource and deserves all the protection necessary for our own and future generations. We now in positions of responsibility will be judged by those who come after us if we fail.

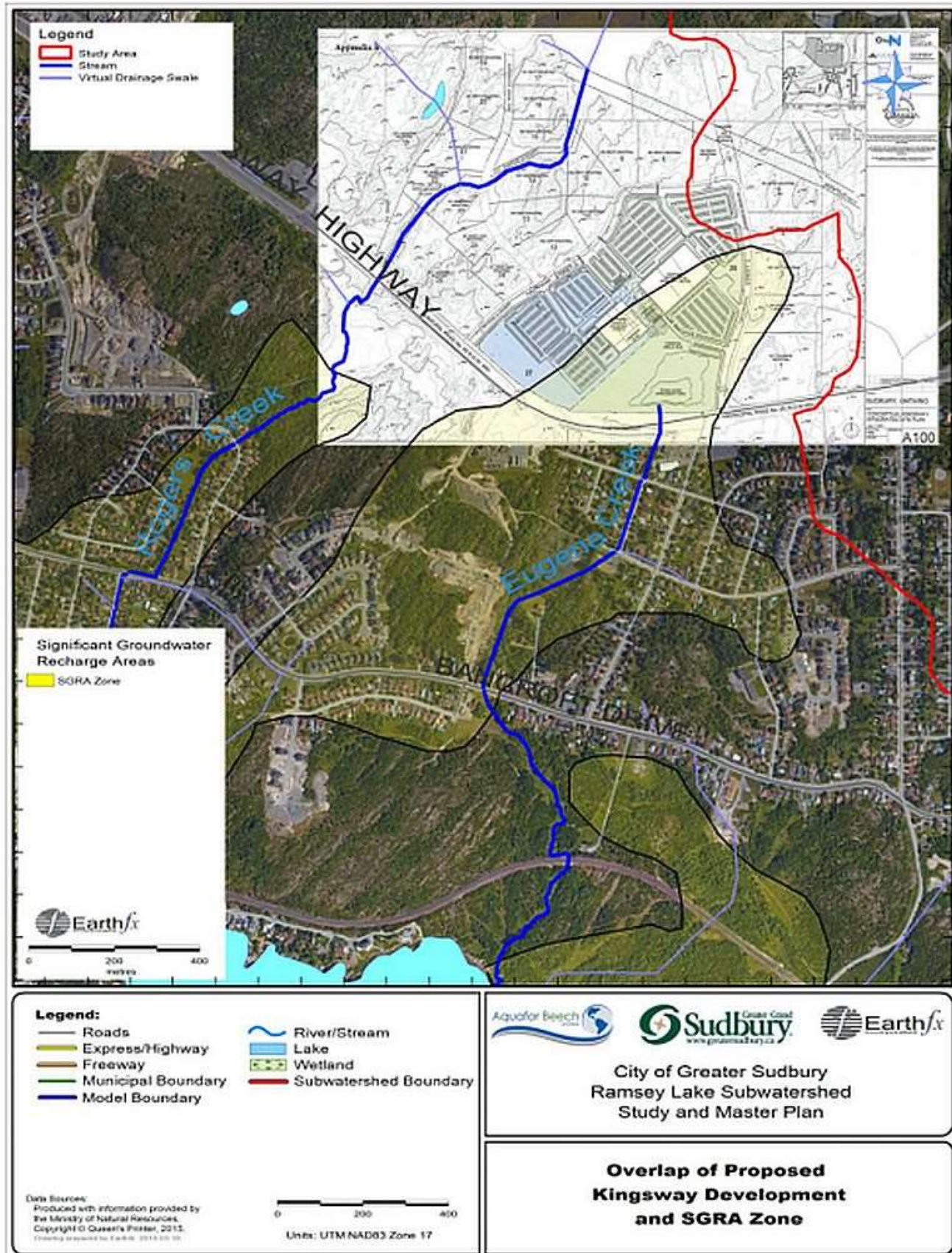


Figure 8.4: Overlap of proposed Kingsway development and SGRA Zone