

Vermilion River Stewardship



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City of Greater Sudbury
PO Box 5000, STN 'A', 200 Brady St.
Sudbury, ON
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Canada
Email: officialplan@greatersudbury.ca

Attention: City Clerk

Dear Sirs:

**Re: Official Plan Review – 23 January 2012
VRS Submission**

The Vermilion River Stewardship (VRS) was formed to act as a voice for the Vermilion River and its Watershed, and to work to build partnerships and strategic alliances with all other interested parties, communities, stewardships, organizations and industry to ensure clean and healthy water quality and a balanced and sustainable ecosystem and natural habitat.

VRS wishes to express full support for the Coalition for a Liveable Sudbury's excellent OP Review Submission, especially in the areas of Water, Natural Heritage, and Stormwater Management and Development. Rather than repeating many areas of their suggestions, please know that CLS has our full support and gratitude for such a comprehensive report!

VRS wishes to comment on several areas where we feel the Official Plan could be improved to better support healthy and clean water within its City of Water. The following are the recommendations offered by VRS:

1. Clean and Healthy Water

1. VRS is requesting protection under the Clean Water Act for private wells and water intakes on and along waterways.
 - a. Development pressures are already affecting water quality with 9 Sudbury lakes reporting Blue Green Algae, with a total of 32 in all of Ontario.
 - b. Public Health and Safety is at serious risk – many rely on the lakes and rivers for all their household water requirements.
 - c. Recommending a model similar to the [Lake Simcoe Protection Act](#).
2. Inclusion of the Vermilion River & Ella Lake in the 2012 Lake Water Quality Program (LWQP).
 - a. It is the longest and perhaps largest water body in the District of Greater Sudbury.
 - b. Has a long history as a workhorse for the City of Sudbury.
 - c. Receives effluent from 9 WWTF, numerous lift stations & lagoons.
 - d. Drains the entire Vermilion River Watershed.
 - e. Currently no sampling from Vermilion Lake to Kusk Lake.
 - f. LWQP is incomplete without the Vermilion River.

2. Stormwater Management

1. Initiate a Stormwater Master Plan for the Greater City of Sudbury.
 - a. There is very little Stormwater Management information is available to the public.
 - b. Stormwater Management and treatment is essential to clean, healthy waterbodies.
2. Current Stormwater Management practices be reviewed and upgraded to protect receiving waters.
3. Stormwater retention and treatment be mandatory before release into the Watershed.
4. A Stormwater Infrastructure Map must be included in the OP.

3. Waste Water Treatment Facilities (WWTF)

1. All new or upgraded WWTF must have Tertiary Treatment.
2. WWTF and infrastructure upgraded to eliminate bypasses.
3. Implement a warning protocol to shoreline residents when WWT bypasses or toxic algae events occur and water quality is compromised.
 - a. Health Department response was inadequate – they only notified a few residents – many were notified by VRS, however, there are many we do not have contact information for.

4. Development Considerations

1. Adopt a [Millennium Ecosystem Assessment](#) approach as endorsed by the United Nations
 - a. Environmental, ecological & social costs of development must all be figured into development proposals.

- b. Placing a value on the broad range of benefits we and future generations would derive from these resources.
 - c. A comprehensive assessment of the consequence of ecosystem change on human wellbeing is paramount.
- 2. Create Low Impact Development Standards for Sudbury
 - a. With a goal to protect and enhance water quality in the Watershed.
 - b. Capacity of a waterbody must consider water quality, visual quality, and recreational quality.
 - c. Policies must follow the precautionary principle & take cumulative effects and climate change into account.
 - d. Public health and safety must be given first priority.
- 3. **City Council firmly reject the 4 Hydroelectric Dam proposals** on the Vermilion River:
 - a. Modified peaking operating strategy – holds water back for up to 48 hours.
 - b. Dams will be peaked several times daily when flows permit – causing frequent and extreme flow velocity and water level swings.
 - c. Stability and safety of ice conditions are in question – what affect will this have for winter activities on the river, and economic development.
 - d. Numerous negative impacts on water quantity & quality will result¹
 - e. Serious consideration must be given to heavy metals deposited in the riverbed over 100 years of mining and WWT.
 - f. Vale Public Water Intake supplying over 13,000 people their drinking water will be impacted.
 - g. Hundreds of private wells and water intakes along the River will be negatively impacted.
 - h. Due to the nature of hydroelectric, rivers do not flow at Installed Capacity for only but a few months of the year, so the amount of energy generated will be about half of the advertised amount.
 - i. Vermilion River is already under stress, and water will be held back the longest when the river is most vulnerable during the low flow summer & winter months.
 - j. The cumulative effects of all of the above impacts must be considered.
 - k. The precautionary approach must be taken.
 - l. Water quality and public health and safety are at risk.
 - m. The 3 upper dam proposals at McPherson Falls, Cascade Falls and At Soo Crossing can all be stopped by NDCA and the City of Greater Sudbury.
 - n. These hydroelectric dams will have unacceptable environmental impacts, and do not contribute in any way to *“the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment.”*²

¹ Environment Canada. 2001 - Threats to Sources of Drinking Water and Aquatic Ecosystem Health in Canada. National Water Research Institute, Burlington, Ontario. NWRI Scientific Assessment Report Series No. 1. 72p. Page 69 – 15. **Impacts of Dams/Diversions and Climate Change**

² Environmental Assessment Act (EAA), R.S.O. 1990, c E.18

5. A City that Values Natural Heritage

1. Adopt a Natural Heritage System to establish a sustainable greenspace network throughout Greater Sudbury (using Guelph OPA42 as a template).
 - a. Significant Natural Area designation to all waterways and their floodplains.
2. Initiate a comprehensive study to determine & inventory heritage features and values, such as
 - a. Significant wetlands & fish & wildlife habitats.
 - b. Parks and green space opportunities classified as ecological & natural park reserve.
 - c. Historical, archaeological & geologically significant areas.
 - d. Significant woodlots identified and preserved.
 - e. Water recharge areas.
 - f. Identify potential & existing Areas of Natural & Scientific Interest (ANSI) sites.

6. Vermilion River – a Natural Heritage Feature

1. Designate the Vermilion River as a Natural Heritage feature to recognize its rich value, history and culture and to generate pride and interest.
 - a. First Nations culture, history and connections to the River:
 - I. Whitefish Lake First Nation history & culture – could be a shared project.
 - II. Odawa & Beaver peoples' traditional territory was from MacGregor Bay to the headwaters of the Vermilion. The river was their road – in winter they travelled by snowshoe, and in summer by canoe.
 - III. Travellers often made camp at the top of a portage. There are existing & potential archaeological sites on the Vermilion
 - 3 archaeological sites indicating pre European contact have been detailed by Ken Buchanan.
 - Sites are located near At Soo Crossing, Cascade Falls, and another near Penage Lake Road.
 - b. Over 100 years of Finnish culture & history with the River at its center. We are very fortunate to have two history books documenting this culture and people – “Beaver Lake” and “Beaver Lake II”.
 - I. Finnish homesteaders settled on both sides of river.
 - II. The river was their road.
 - III. Scows were used for transport on the river until 1960.
 - c. 1890 to 1930 - log drives on the Vermilion River.
 - d. Provides habitat for numerous endangered species.
 - e. Popular recreation destination in both summer and winter.
 - f. Builds appreciation & attention to assets of the River and of Sudbury.

Thank you for this opportunity to submit our comments on the OP Review. VRS looks forward to your response.

Respectfully,



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