



June 7, 2023

VIA EMAIL

Members of Regional Council
Regional Municipality of Peel
10 Peel Centre Drive,
Suite A and B,
Brampton, ON L6T 4B9

RECEIVED

June 7, 2023

REGION OF PEEL

OFFICE OF THE REGIONAL CLERK

Dear Members of Regional Council:

RE: Bolton Water and Wastewater Servicing Strategy Report – June 8, 2023

I write on behalf of Caledon Community Partners (CCP), the landowner group within the Option 3 lands in northwest Bolton. CCP is seeking clarity on certain aspects discussed in the above noted report.

I begin by reiterating CCP's commitment to supporting the Region of Peel and the Town of Caledon in advancing their planning objectives, including the delivery of essential services in a fiscally responsible manner and facilitating the delivery of a diverse housing supply within the planned transit-oriented community in northwest Bolton. Our commitments are consistent with the Housing Pledge recently passed by Caledon Town Council.

Although we understand that providing essential services is not a simple task and that the entire Regional system needs to be considered, we do believe that a phased approach to implementing the "ROPA 30 Water and Wastewater Servicing Study" can be achieved without impacting the potential outcomes of the larger EA process. We also believe that phasing can be achieved in a fiscally responsible manner, supportive of the proposition that "growth pays for growth". While Regional staff's work to date has been excellent in capturing the requirements for the entire ROPA 30 lands, we respectfully suggest that more can be done now to advance the critical components essential to initiating an early phase of development.

Option 3 Infrastructure Requirements

After positive discussions with Region staff, CCP is generally aligned with staff's position on the infrastructure necessary to advance the first phase of the northwest Bolton transit-oriented community. However, it is important to note that most of the "Projects" listed in Appendices II and III to the Study are not required for the preferred and most advanced portion of the community, being the Option 3

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED _____



lands. In the opinion of CCP's engineers, as listed in the report, a sanitary sewer outlet to Coleraine Drive (WW08 & WW14), watermains from King Street to Coleraine Drive (W21 & W24) and a water booster station located at Chickadee Lane and Emil Kolb Parkway (W19) are all that is needed to facilitate the first phase of the community.

Environmental Assessment

As Region staff advance their Bolton EA process to further define the infrastructure requirements, we asked one of Ontario's leading Environmental Assessment consultants to determine if any of the required works could be lawfully exempted from the lengthy EA process. In her professional opinion (attached), all of the components listed above are able to proceed to detailed design and construction without undergoing the EA process. As Regional staff have a different opinion, we would welcome the opportunity to review our consultant's opinion with staff in detail. The potential outcome is that infrastructure critical to both existing Bolton residents and future growth could be delivered 18 to 24 months sooner than if required to proceed through the full EA process.

Capital Costs

It is our understanding that while the remaining cost to service the balance of the ROPA 30 lands, exclusive of the Option 6 area, are estimated to be \$143 Million, the costs attributable to the Option 3 lands are far less. Using the information contained within this report and applying the Region's cost methodology, it is our engineer's opinion that the costs specific to Option 3 are approximately \$21 million, plus any recent increases attributable to inflation. It would be helpful to all concerned if the costs of advancing each development area were presented as a comparison so that Council and the public can better understand the differences.

Front-end Financing of Infrastructure

The financing needed to fund services that will support new growth is an important consideration for the Region – particularly in light of recent Provincial legislative changes that directly impact municipal revenues. CCP takes this opportunity to repeat to the Region our willingness to front-end these servicing costs in addition to managing the design and construction of this infrastructure. Not only would this approach assist Regional cash flow in the intervening years, it will also alleviate the work load for Region staff, effectively allowing the Region to deliver more housing and better infrastructure in less time. We believe this aligns appropriately with Regional Planning Policies for the Bolton expansion lands and will assist the Region and the Town in meeting their respective goals as set out in Places to Grow and the Housing Pledges, respectively.

In conclusion, CCP applauds the Region and its staff for their efforts to optimize the use of existing infrastructure and development charge funding to bring the northwest Bolton community forward. Our team would appreciate the opportunity to work in a collaborative partnership with the Region and the



Town to find all the available efficiencies in both time and costs, while continuing to deliver the same level of service the residents of Peel have grown to expect. Specifically, CCP invites the Region and the Town to work collaboratively toward:

1. Advancing a phased approach to the delivery of infrastructure.
2. Investigating all opportunities to avoid a redundant EA process through utilizing existing Region lands for the water booster station.
3. Defining the true costs associated with delivering each of the ROPA 30 Options, to better understand the financial impacts to the Region.
4. Employing innovative front-end financing arrangements that move the financial risk to the landowner, puts into action the knowledge base of the private sector and achieves growth faster and more affordably than standard methods of municipal processing, financing and infrastructure construction.

Thank you once again for your consideration of these matters which we truly believe are in the best interests of all parties involved.

Respectfully submitted,
CALEDON COMMUNITY PARTNERS

A handwritten signature in black ink, appearing to read "A. Wisson", written in a cursive style.

Aaron Wisson

BRES INFRASTRUCTURE REQUIREMENTS EXTERNAL SERVICING INFRASTRUCTURE PLAN

WATER DEVELOPMENT PLAN COSTS

\$9 Million

Watermain Cost

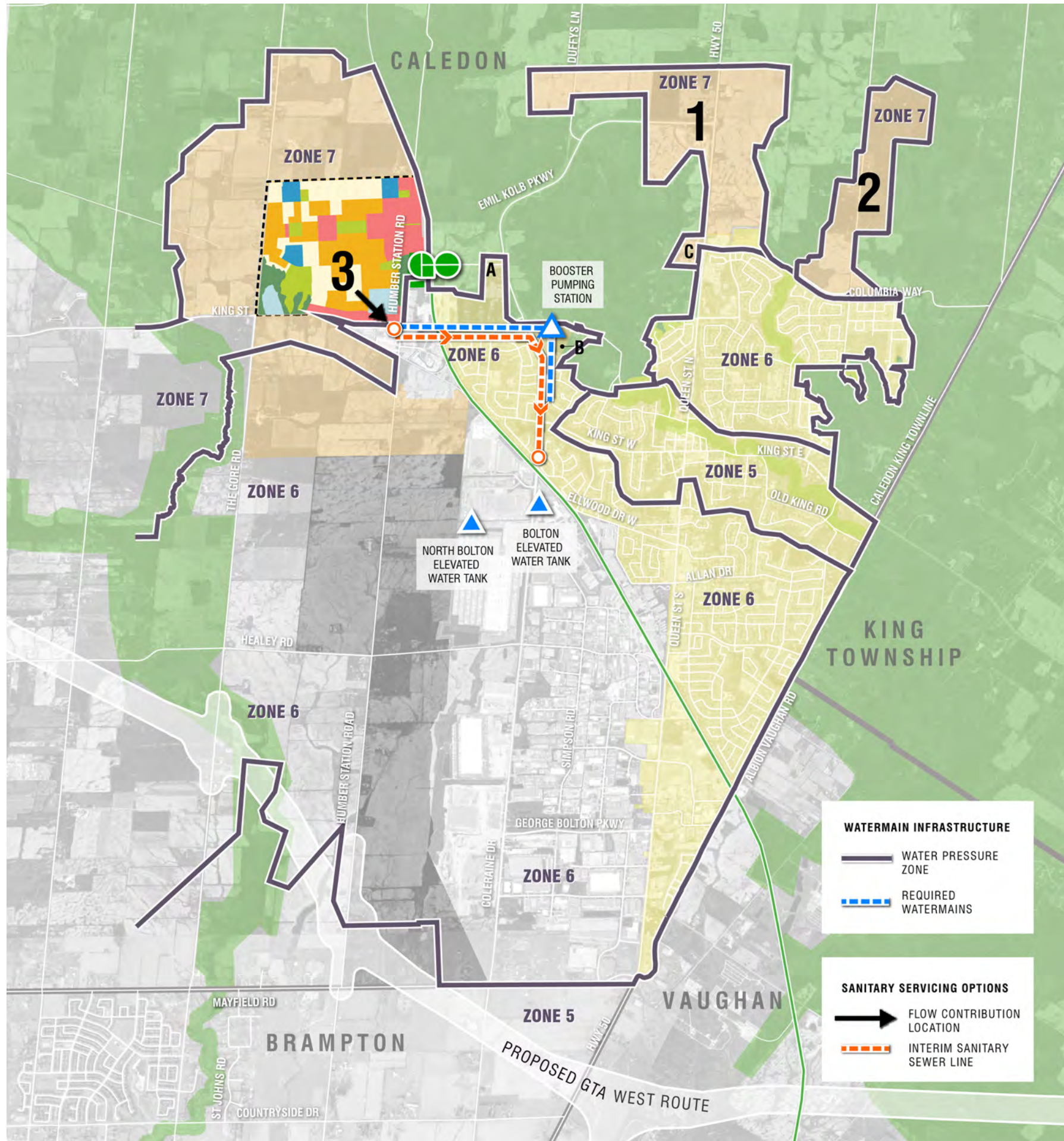
\$4.5 Million

Booster Pumping Station Cost

SANITARY SERVICING PLAN COSTS

\$7.2 Million

Interim Sanitary Sewer Cost





9 Darrowby Crescent
Palgrave, Ontario L7E 0C8

Cell: 416-529-3613
Email: pbecker@pathcom.com

May 2, 2023

Aaron Wisson
Caledon Community Partners Inc.
Sent by email: aaron@argoland.com

RE: Opinion on Municipal Class EA Requirements for Bolton Expansion Area Servicing

P Becker Consulting was requested by Caledon Community Partners Inc. to review and provide an opinion on application of the amended MEA Municipal Class Environmental Assessment (March 2023) on the water and wastewater servicing for the Caledon Station development (Bolton expansion area 3).

Patricia Becker, MES is an EA Specialist with over 30 years of EA experience (including 23 years as P Becker Consulting). Pat has worked for municipalities and the private sector in the areas of environmental assessment, environmental planning and approvals throughout Ontario. Through project work P Becker Consulting has been involved in completing numerous environmental assessments (both provincial (individual and class) and federal) for various types of projects (e.g., master plans, transportation, water and wastewater) and in obtaining all necessary approvals. For the transportation projects, the Municipal Engineers Association Class EA process has been completed for both Schedule B and C projects.

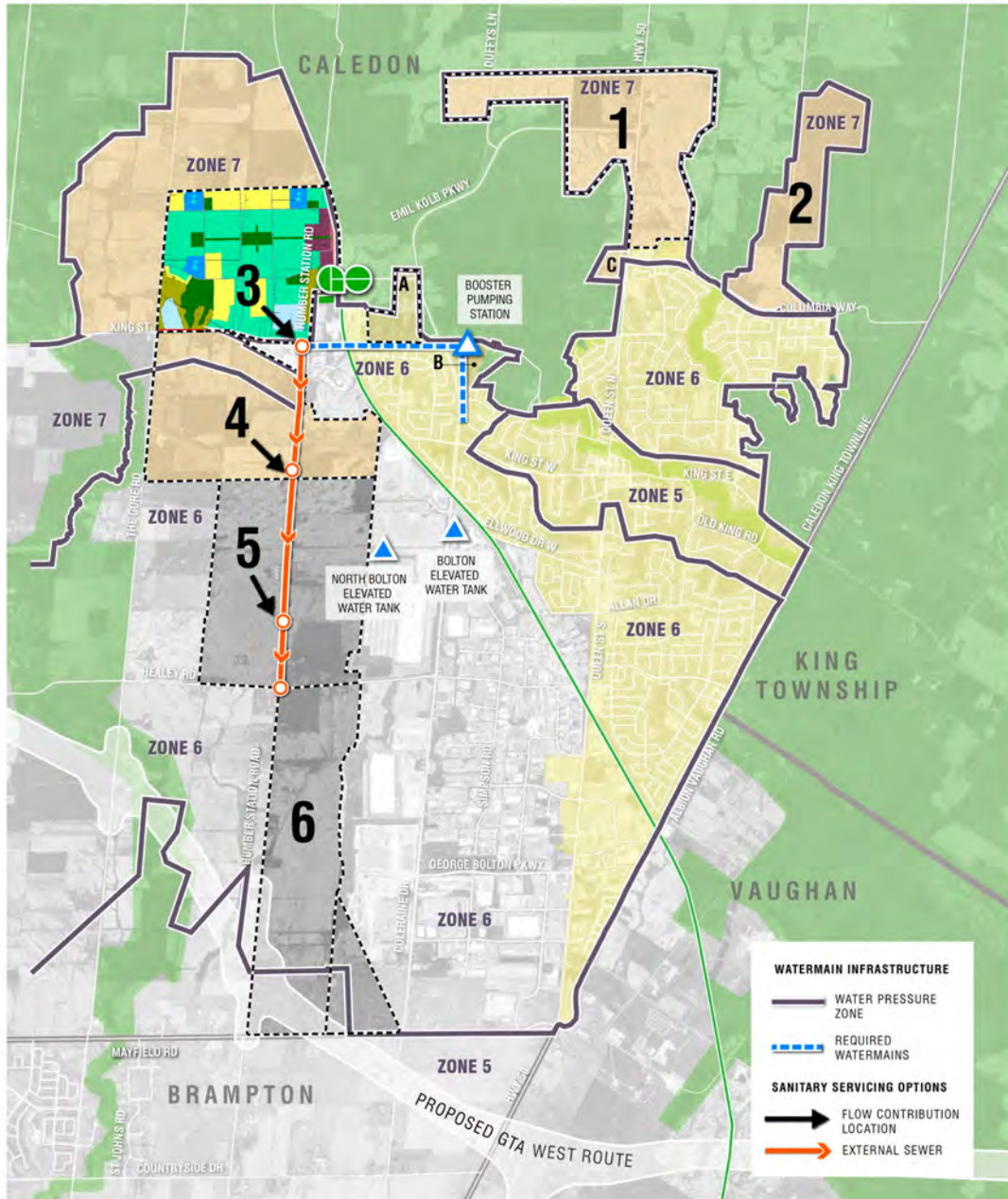
The purpose of this letter is to provide an opinion on the Class EA requirements related to the Municipal Engineers Association (MEA) Municipal Class Environmental Assessment (March 2023) for the wastewater servicing on Humber Station Road; the watermain along King Street W (from Humber Station Road to Coleraine Drive and then south on Coleraine Drive); and a new the booster pumping station (near the intersection of King Street W and Coleraine Drive).

1.1 Background

The Region of Peel completed the 2020 Water and Wastewater Master Plan for the Lake-Based Systems (2020 Master Plan) which was intended to address the increasing demands on the Region's water and wastewater infrastructure. The preferred water and wastewater servicing strategies needed to meet the servicing needs of existing and future development to 2041 were determined. Any projects identified in the Master Plan as Schedule A, A+ or B can proceed to implementation.

To initiate the Caledon Station development in the Bolton expansion area (west of Humber Station Road and north of King Street) in Bolton, ON extension of the water and wastewater servicing is required. The following figure shows the watermain required on Coleraine Drive (south of King Street W) to a booster pumping station (water) and then west along King Street W to Humber Station Road. A booster pumping station is required in the area of King Street W and Coleraine Drive. A sanitary sewer is required along Humber Station Road (from King Street W to Healey Road). These watermains and sewer provide necessary connections to existing

servicing and offer the opportunity for initial development of Caledon's preferred expansion area.



1.2 2023 MCEA Requirements

On March 3, 2023 the amended MEA Municipal Class EA was released by the Ministry of the Environment, Conservation and Parks (MECP). This amended Municipal Class EA (MCEA) is part of the EA Modernization being undertaken by MECP to the Environmental Assessment Act as well as incorporating recent legislation applicable to the EA Act (More Homes More Choice Act (2019) and COVID-19 Economic Recovery Act (2020)). Section A.1.4 Transition Provisions describes how the amended Class EA should be used to transition municipal infrastructure projects to the new Municipal Class EA process. For any project where a Notice of Commencement has not been issued as of March 3, 2023 these projects should follow the amended Class EA process. Since a Notice of Commencement has not been issued for the watermain, drinking water booster pumping station and sanitary sewer identified in the Figure they would be subject to the amended Class EA (March 2023) process.

As noted above, the Region of Peel completed the 2020 Water and Wastewater Master Plan for the Lake-Based Systems (2020 Master Plan) which identified preferred water and wastewater servicing strategies. Any projects identified in the Master Plan as Schedule A, A+ or B can proceed to implementation since the EA component was completed for these projects. Projects that were not included in the Master Plan can be considered under the new Municipal Class EA process.

In following the More Homes More Choice Act (2019) the amended Municipal Class EA has revised the schedule of projects and there are now four schedules that water and wastewater projects can fall within:

- a) Exempt
- b) Eligible for Screening (Archaeological Screening Process)
- c) Schedule B
- d) Schedule C

Schedule B and C projects would still follow the applicable Phases 1 to 5, which is unchanged from the previous Class EA process (as amended 2015). Appendix 1 includes the Project Tables for the roads, water and wastewater projects with Table B: Municipal Water and Wastewater Projects outlining the specific projects and the applicable schedules.

1.3 Applicable Class EA Project Schedules

1.3.1 Water Distribution

Exempt

- 4b.** *Establish, extend or enlarge a water distribution system and all works necessary to connect the system to an existing system or water source, provided all such facilities are either in an existing road allowance or an existing utility corridor including the use of Trenchless Technology for water crossings*

Eligible for Screening (ASP) or Schedule B

- 5d.** *Construct a new pumping station where the facility is not located in or adjacent to an environmentally sensitive natural area, residential or other sensitive land use, or on land with cultural heritage or archaeological potential*

1.3.2 Wastewater Collection

Exempt

22b. *Establish, extend, or enlarge a sewage collection system and all necessary works to connect the system to an existing sewage or natural drainage outlet, provided all such facilities are in either an existing road allowance or an existing utility corridor, including the use of Trenchless Technology for water crossings*

Since both the watermain and sewer are to be located within existing road allowances they would fall under the “**exempt**” from the EA Act schedule.

For the booster pumping station (water) a screening level of analysis could be undertaken to determine potential sites within the area for siting of the booster pumping station. There is a suitable site near the intersection of Coleraine Road and King Street W that would be preferred based on all aspects of the environment:

- **Natural Environment:** not located on, adjacent or near an environmentally sensitive area
- **Social Environment:** located away from residential areas
- **Cultural Environment:** no cultural heritage resources present (recently cleared through an archaeological assessment completed for the road)
- **Technical – Financial Consideration:** located on municipally owned lands that are accessible for construction and within the pressure zone

The location of the booster pumping station and the clearance through a previously conducted Stage 2 Archaeological Assessment (for the road construction) means the site would be **exempt** from meeting the EA requirements through the Archaeological Screening Process.

1.4 Conclusion

For the both the watermain and sewer extension projects (shown in the previous figure) the proposed alignments are within existing road allowances. Based on the amended Municipal Class EA process these projects are **exempt** from meeting the requirements of the EA Act and can proceed to implementation (detailed design and construction). It is during detailed design that issues such as size and depth of the watermains or sewer would be addressed since they are design related issues and are not specific to the EA planning process.

For the booster pumping station (water), based on the screening it could be determined under **5d.** this project would be **exempt** based on the Archaeological Screening Process and could proceed to implementation (detailed design and construction). MECP’s intent with the amended Class EA process was to introduce some of the EA Modernization into municipal infrastructure projects. Since 2019 all Schedule A and A+ projects have been exempt from the EA Act and this was to ensure that less complex projects (e.g., watermains and sewers) could proceed without delay to permit the construction of more homes. Currently available for comment on the Environmental Registry, MECP is evaluating the need for the EA Act requirements for municipal infrastructure projects that currently follow the MEA Municipal Class EA Process. Based on this MECP has been encouraging proponents to follow the applicable Class EA schedule for projects and not to undertake another higher schedule, in particular for less complex projects.

If you wish to discuss this matter further, please feel free to contact me.



Patricia Becker, MES
Principal/EA Specialist
P Becker Consulting

c: 416-529-3613 / e: pbecker@pathcom.com