



**Waterloo Region
District School Board**

Education Centre

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January 11, 2013

Via email to: npdumouchelle@uniongas.com
Hard copy to follow via regular mail

Mr. Norm Dumouchelle
Environmental Planner
Union Gas Limited
P.O. Box 2001
50 Keil Drive North
Chatham, ON N7M 5M1

Re: Union Gas Limited, Owen Sound Pipeline Replacement Project - Impacts on Planned School Sites

Dear Mr. Dumouchelle:

Further to our letters of September 7, 2012 and October 23, 2012 (both attached) and following our review of the *Owen Sound Pipeline Replacement Project Environmental Report*, we wish to further clarify our concerns.

The Waterloo Region District School Board was involved in the development of the Rosenberg Secondary Plan (2011) through intense consultation with the City of Kitchener, resulting in the designation of three public school sites in the City's Official Plan. The location of these sites was based on criteria that included a minimum setback distance from known gas pipelines, and other major facilities. Land uses were adjusted to ensure a minimum setback from gas pipelines running through the area and the school site locations were fixed – an Official Plan Amendment would be necessary for relocation of the planned school sites.

The Union Gas proposal (2012) to replace the Owen Sound Pipeline with a new section that will run down Bleams Road seriously compromises the approved Secondary Plan, putting one of the designated school sites within 100 metres of a high pressure gas pipeline. The proposed 12" pipeline, operating at 500 psi poses a safety concern with respect to the location of public facilities including schools. Recent pipeline setback standards calculated by Dr. Charles Rhodes indicate that a minimum distance of 231 metres is necessary to ensure human safety in the event of a pipeline rupture (attached).

The DRAFT Ontario Provincial Policy Statement 2012 makes it clear that planning for both Major Facilities (oil and gas pipelines) and Sensitive Land Uses (daycare centres, and educational and health facilities) should ensure that:

"...they are appropriately designed, buffered and/or separated from each other to...minimize risk to public health and safety, and to ensure the long-term viability of major facilities."

As noted above, planning by the Waterloo Region District School Board for the location of future school sites has incorporated this policy interest, and risk mitigation based on the location of existing major facilities (including gas pipelines).

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The City of Kitchener has indicated no desire to change the Rosenberg Secondary Plan to accommodate the necessary setback requirements in light of this proposed new pipeline. The Waterloo Region District School Board should not be expected to initiate an Official Plan Amendment in order to rework the Secondary Plan to achieve safe separation of our planned new school from this proposed new pipeline.

As a result, the Waterloo Region District School Board strongly objects to the new pipeline along Bleams Road unless the design for the pipeline – location, size and maximum operating pressure – is modified to meet the pipeline setback standards based on the Rhodes Formula. In the interests of public safety, in particular the safety of future elementary students in our schools, we ask that Union Gas reconsider their plan for the Bleams Road section of the new pipeline.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. S. Cuomo", with a long horizontal flourish extending to the right.

Dennis S. Cuomo MCIP, RPP
Manager of Planning
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P: (519)570-0003 Ext: 4461

Enclosures

cc: Alain Pinard, City of Kitchener
Ontario Energy Board
M. D. Costello, Union Energy
Grant Osborn, Ontario Ministry of Education
Michael van Bodegom, White, Duncan, Linton
Kevin Eby, Regional Municipality of Waterloo
Juliane von Westerholt, City of Kitchener