



**Waterloo Region
District School Board**

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via email to Alain.Pinard@kitchener.ca

October 23, 2012

Mr. Alain Pinard
Director of Planning
City of Kitchener
200 King Street West
6th Floor, P.O. Box 1118
Kitchener, ON N2G 4G7

**Re: Impacts of proposed Owen Sound Pipeline Project - Union Gas Limited on
Rosenberg Secondary Plan**

Dear Mr. Pinard:

Further to our letter of September 7, 2012, regarding the proposal to locate new high pressure natural gas lines introduced by Azimuth Environmental Consulting ("Azimuth") on August 22, 2012, we have some additional comments on behalf of the Waterloo Region District School Board. We strongly object to the proposed location along Bleams Road as it compromises the Secondary Plan completed for the area, and represents a significant safety concern for the potential development of a designated school site in the vicinity of Isaiah Drive, now contained within the City's Official Plan.

As we indicated previously, current research suggests that the minimum setback from high capacity natural gas lines is 200 metres. Depending upon the size and pressure of the pipe, that distance may be greater.

The DRAFT Ontario Provincial Policy Statement 2012 has recently been revised to include a provision regarding these "Major Facilities" and their relationship to "Sensitive land uses":

Major Facilities are described as:

...facilities which may require separation from sensitive land uses, including but not limited to airports, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, **oil and gas pipelines**, industries, and resource extraction activities.

Sensitive land uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects from contaminant discharges generated by a nearby major facility. Sensitive land uses may be a part of the natural or built environment. Examples may include, but are not limited to: residences, **day care centres, and educational** and health facilities.

Policy 1.2.6.1 *Major facilities and sensitive land uses* should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities.

Clearly, the high pressure natural gas pipeline proposed within 200 m of a designated school site does not meet the stated provincial interest. Significant planning went into locating the designated school sites in the Secondary plan, governed by criteria that included a minimum setback distance from gas pipelines. Neither City nor Board interests would appear to be met if permission is granted for this gas pipeline in the proposed location.

As you have indicated, the City is not prepared to entertain a change to its recently adopted Rosenberg Secondary plan, and the Board is not interested in pursuing an Official Plan Amendment at a later date to relocate its site away from this facility.

Given the above, it would seem appropriate for both the City of Kitchener and the Regional Municipality of Waterloo to take an equally strong position on this issue, voicing similar objections to Azimuth before its proposal to extend gas service along Bleams Road gains any further momentum.

Sincerely

A handwritten signature in black ink, appearing to read 'D. Cuomo', with a long horizontal line extending to the right.

Dennis S. Cuomo MCIP, RPP
Manager of Planning

cc: Ted Martin, WRDSB Chairperson
Grant Osborne, Ontario Ministry of Education
Michael van Bodegom, White, Duncan, Linton
Juliane von Westerholt, City of Kitchener
Kevin Eby, Regional Municipality of Waterloo
Paul Neals, Azimuth Environmental Consulting