

September 13, 2022

Mr. Nick Snyder  
Chief Building Official  
Development Services and Environmental Sustainability  
Township of Muskoka Lakes  
1 Bailey Street  
Port Carling ON P0B 1J0

Dear Mr. Snyder,

**Re: On Site Sewage System Maintenance Inspection Program  
Staff Report BLDG-2022-06  
Planning Committee Agenda Item 10a September 15, 2022**

Further to our letter dated March 11, 2022, the Muskoka Lakes Association together with Friends of Muskoka are writing to provide comments on the staff report related to the proposed On-Site Sewage System Maintenance Inspection Program, Item 10a on the Planning Committee agenda of September 15, 2022.

Again, we would like to commend TML for increasing efforts to ensure private sewage systems continue to function to protect the watershed.

**Independent Inspection Contractors Retained by TML**

One of the main comments made in our previous letter was around the need to hire independent consulting services to conduct inspections, rather than rely on individual property owners to hire their own inspectors. As noted in the staff report, this will better ensure consistent, timely and cost-effective reporting provided to the Township. We are pleased to see that staff are recommending one full time and one part time staff member to administer the program, to be added to the draft 2023 operating budget for consideration by the next council. Additionally, consulting services are recommended to be retained once these staff are approved and hired. We note, however, that only the properties considered to be high risk will be treated in this way, and property owners will have the option of hiring their own "qualified" inspector. It is unclear why hiring their own inspector is being offered, and how the Township will establish who is qualified to perform the inspections.

**Township Capacity to Conduct Inspections for Moderate Risk Properties**

The report indicates that the properties classified as moderate risk will be inspected by Township staff and that perhaps 4000 of these systems currently exist in the Township. It is unclear how, even with the additional staff being recommended for consideration in the 2023 budget that these inspections will be accomplished in a reasonable time frame. The Township may wish to consider expanding the services of the third party consultant to achieve this.

### **Risk Classification**

The definition of risk levels appears to have changed in the revised policy document. In the previous draft from March 2022, the high risk level was defined as, among other criteria, greater than 30 years old whereas moderate risk systems were defined as 10 to 30 years old. In the new policy document, the age criterion has been revised to greater than 40 years old for high risk and 10 to 40 years old for moderate risk. The staff report is silent on why this change has been made and we question if the environmental risk is greater under the revised policy.

In summary, we are pleased that this council is showing the intent to advance an enhanced on-site sewage inspection program through pre-budget staffing commitments. We hope that the next council follows through with this intent and that our additional comments are considered as the program moves forward.

Sincerely,



Susan Eplett  
President,  
Muskoka Lakes Association



Laurie Thomson  
President,  
Friends of Muskoka

cc: A. Mulholland  
D. Pink  
D. Hammond  
Chair Bridgeman and Members of Planning Committee