

March 11, 2022

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

Dear Mr. Snyder,

Re: Proposed Sewage System Maintenance Inspection Policy

Muskoka's natural environment and especially its lakes and rivers are the source of almost everything good that happens in Muskoka and are the engines that drive Muskoka's appeal and economy.

The ability to swim, enjoy water sports and fish in Muskoka's lakes and rivers is fundamental to Muskoka's future success and prosperity. The lakes are also a vital source of drinking water for the region.

With thousands of private sewage systems in the Township, inadequate or malfunctioning private sewage works represent a significant risk to the health of the lakes, drinking water sources, the local environment, and the economic viability of the entire region.

We commend TML for increasing their efforts to ensure that private sewage systems continue to function as intended to protect the watershed. Establishing a recurring system of inspections is an excellent first step. We would like to provide some suggestions at this time which we hope are helpful.

Risk Level, Inspection Type and Inspection Frequency

The draft policy categorizes sewage systems into high, moderate and low risk systems, then prescribes the type (level of detail) of inspection and the frequency. Recognizing the number of systems in the Township, this is a reasonable approach to getting started – highest risk systems first with the highest level of detail and greatest frequency.

However, low risks systems, defined as those less than 10 years old or installed on a property not abutting a navigable waterway, are not recommended for any inspection at any frequency. We suggest that the policy include these systems also, so that all systems in the Township are included in the inspection program. We also suggest that inspections be done every 10 years, rather than 15 years, for properties not characterized as high risk.

We would add that systems installed on property that does not abut a waterway still has the potential to impact groundwater quality in neighboring properties and potential drinking water sources.

We understand that the Township's by-law inspectors have identified situations where additional buildings or facilities have been added or expanded since initial design and construction, sometimes without proper permits, and this could result in ineffective treatment of wastewater and/or system failure. We recommend that the Township determine its authority to perform a building inspection approximately one year after a new build, to validate compliance with the building plans, and the adequacy and state of the septic system.

Scope of Inspections

While it is not the MLA's intent to comment on the detailed technical components of inspections, we would ask that the following aspects should be included in addition to what is already being proposed:

- Confirmation that all sources of wastewater are being directed to the approved system
- Confirmation that the size and design of the system is appropriate, by today's standards, for the existing buildings and fixtures
- Confirmation that adequate buffers and clearances are provided

Inspection Contractors

To achieve consistent, accurate, credible and cost effective outcomes we recommend that TML should retain independent contractors to perform the inspections, rather than relying on the property owner to retain these services, with costs recovered from the property owners. The incremental effort and cost associated with thousands of property owners each making a hiring decision and contractors making thousands of single purpose trips is inefficient and potentially more costly than having the Township retain these services. Tiny Township has very successfully used an approach for many years with many parallels to these recommendations.

In summary, it is our view that **TML's septic system inspections must:**

- **include all private systems;**
- **include confirmation that the system is appropriate, by today's standards, for the site development;**
- **be conducted by credible independent contractors retained by TML; and**
- **be funded by the property owners.**

Muskoka is extraordinary and deserves nothing less than a rigorous, world class septic system inspection program.

We would be pleased to hear from you to clarify or expand upon any of our suggestions.
Thank you for the very important work you are doing.

Sincerely,



Chris Cragg
Chair, Environment Committee
Committee
Muskoka Lakes Association



Susan Eplett
VP and Chair, Government & Land Use
Muskoka Lakes Association



Laurie Thomson
President, Friends of Muskoka

cc: David Pink, Director of Development