

May 9, 2018

Delivered via email: iroger@get.on.ca

Township of Guelph/Eramosa
8348 Wellington Road 124, P.O. Box 700
Rockwood, Ontario N0B 2K0

Attention: Ian Roger, Chief Administrative Officer

Dear Sir:

**RE: Township of Guelph/Eramosa Zoning By-Law Amendment Application ZBA03/18
Xinyi Canada Glass Limited**

City of Guelph staff have been awaiting further information following the presentation provided by the County of Wellington (County), Township of Guelph/Eramosa (GET) and Xinyi Canada Glass Limited on February 21, 2018 regarding plans to construct a new float glass manufacturing facility located at 5081 Wellington Road 32. We now understand that a complete application for a Zoning By-Law Amendment has been received by the Township to allow for the proposed use and that a Public Meeting to receive the application will take place on May 9, 2018. This letter is provided in response to the application and outlines the City's key areas of concern regarding the proposed facility.

The Xinyi Glass Plant has the potential to impact the City's water supply. As you are aware, the City and GET, working in partnership with the County and the GRCA, have completed a Tier 3 Water Budget and Local Area Risk Assessment. This project has defined a Wellhead Protection Area for water quantity (WHPA-Q) that surrounds the City extending into GET and includes the proposed location for the Xinyi Plant. Any new water takings within this area would be considered a Significant Drinking Water Threat and present a potential risk to the City's water supply system. The City and the Township are currently developing Source Protection policies to address water quantity which may be in place in 2019. At present, the City has few details on the proposed water taking but we understand that a taking of about 1,440,000 L/day is proposed. A water taking of this magnitude has the potential to create well interference effects on the City water supply wells and in particular, our Queensdale Well. The Queensdale Well is the closest well to the plant and is the City's well that is most sensitive to well interference effects.

The City is unclear regarding GET's intent to allow the proposed use as an "Industrial Use" within the M1 zone when the bylaw requires such industrial uses to be "dry". The amount of water use proposed is significant, especially considering local water system impacts. Further, based on the level of water-taking that appears to be needed, the City is not clear on how the proposed use meets the intent of County Official Plan policy 6.7.9. Considering the amount of water the plant proposes to use, there is concern that the proposed use may conflict with the County Official Plan.

City Hall
1 Carden St
Guelph, ON
Canada
N1H 3A1

T 519-822-1260
TTY 519-826-9771

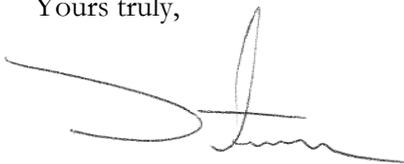
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The City is also concerned that the Planning Justification Report prepared by GSP Group Inc. in support of the application does not analyse the merits of the application with respect to water use, applicable County policy and GET Zoning regulations and definitions, except to note “Preliminary Assessment of the aquifer and testing indicated that there is sufficient water supply on the site to accommodate the proposed demand without impact to adjacent private wells.” The report relies on future technical studies to be addressed through site plan approval and the permit-to-take-water process. Neither of these processes is an appropriate forum for determining use permissions. It is the City’s view that the planning justification needs to directly address how a use that requires such a large water taking can be considered “dry” in the context of the County Official Plan and GET zoning bylaw, and why further amendments to these documents aren’t necessary to permit the use.

In addition to our concerns with the potential water taking by the proposed facility, the City is also interested in understanding how other issues such as wastewater treatment and disposal, increased traffic, air pollution and emergency response will be addressed and analysed through the application. More specifically, we recently learned of a stack that will be constructed to support the melting process and the City would be interested in modelling work that demonstrates the air quality impacts resulting from the stack. With respect to traffic management, the City is unclear regarding the impacts on Wellington Road 124 as it leads into the City and is interested viewing the Traffic Impact Study results. Further, we are unclear as to how the traffic generated from the site aligns with the 2005 Guelph-Wellington Transportation Study.

At this stage of the Zoning Application amendment, the City wishes to document our concerns with the Township and we request more information on the proposed development so that we can properly respond to the application.

Yours truly,



Derrick Thomson,
Chief Administrative Officer

T **519-837-5602**

F 519-822-8277

E cao@guelph.ca

c: Scott Stewart, Deputy CAO, Infrastructure, Development & Enterprise, City of Guelph
Scott Wilson, Chief Administrative Officer, County of Wellington
Jana Burns, Director, Economic Development, County of Wellington