

Reducing Site Alteration Fees: A Path to Sustainable Land Use

1470 Cedar Spring Road
Township of Woolwich



ENGINEERS | CONSULTANTS

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Ontario Regulation 406/19



Recognizing excess soil as a **resource**, rather than a waste



Reduce the amount of clean soil entering landfills



Reduce illegal dumping and inappropriate relocation of soil



Reduce transport costs and greenhouse gases

Site Overview

- Purpose: Pit Rehabilitation back to useable farmland.
- Location: 1470 Cedar Spring Road
- Abandoned aggregate pit from ~1940s/1950s. Partially naturalized.
- Requiring approx. 250,000 cubic metres (m³) of excess soil.
- Located outside of any environmentally sensitive or regulated areas.



Fees

- Township of Woolwich Environmental Impact Fees (EIFs) are significantly higher than many neighboring municipalities.
- Reuse site compliance is increasingly being enforced by the MECP.
- RPRA Fees increased 550% last year and increased further in 2025 – should indirectly lead to increased enforcement.
- Fees for large reuse sites in the Township of Woolwich are a deterrent to rehabilitation.

| Municipality | Approx. EIF |
|----------------|-----------------------|
| Puslinch | \$0.24/m ³ |
| Guelph/Eramosa | \$0.10/m ³ |
| Wilmot | None* |
| Dumfries | \$0.32/m ³ |

Note:
Other fees (application/permit fees, securities, contravention charges, etc.) may apply.
* Site Alteration Bylaw in proposal stage.

Case Study

- Receiving site in Eramosa taking in ~90,000 m³ of excess soil.
- Comprehensive QP involvement from start to finish.
 - Fill Management Plan
 - Fill Applications and QP Source Site Reviews
 - Weekly site presence of QP designate and/or QP
 - All loads logged in SoilFlo, Site Cameras
 - Weekly summaries to the Township
 - Regular Audit Sampling
- Collaboration with the Township has been key!



Benefits of a Local Receiving Site

- ✓ Reduction in greenhouse gases related to transport of excess soil.
- ✓ Increased usable farmland within the Township.
- ✓ Reduction in excess soil from Township going to landfills.
- ✓ Reduction in transport costs and project timelines for Township jobs.
- ✓ Increased confidence that Township soil is being relocated to a suitable location.



Proposed Approach

- **Step 1:** Preparation of Fill Management Plan, including: identification of applicable excess soil quality standards, and procedures for fill import approval, tracking, audit sampling, placement and on-site operations.
- **Step 2:** File a notice on the Resource, Productivity and Recovery Authority (RPRRA) Excess Soil Registry.
- **Step 3:** QP review of potential sources of excess soil.
- **Step 4:** Fill Import (QP and/or QP-designate site visits, soil tracked on SoilFlo, cameras and staff (S&E) on-site at all operating hours, audit sampling, weekly to monthly QP updates to the Township).



The Current Cost

- Below is a very high-level estimate of the current cost(s) for running a fill site of this size in Woolwich.

| Task | Approximate Cost (excl. HST) |
|--------------------------------|---|
| Permit Fee | \$1,000 |
| Environmental Impact Fee (EIF) | \$253,500 |
| RPRA Registry | \$13,230 |
| Initial QP Costs | TBD based on scope discussion with Director |
| Ongoing QP Costs | TBD |
| Operational Costs | ~\$1,000 / day (~\$150,000 / year) |

Argument for Reduced EIF Fees

Proposal: Implement a reduced EIF for over 10,000 m³ based on QP involvement

- Large projects with increased QP involvement, monitoring, and documentation should be eligible for reduced fees, as they carry lower environmental and regulatory risks.
- Between \$0.10 to \$0.32 / m³ would still be in line with neighboring municipalities.
- After permit fees, EIFs, QP fees, operational costs and down-time, most receiving sites do not make much money on importing fill.
- The primary goal here is to increase farmable land at the Site and create a local receiving site in the Township, *reducing costs on Township projects.*

Conclusions

- Requesting a reduced EIF to \$0.20/m³ over 10,000 m³.

| | Bylaw Fees | Requested Fees |
|-----------------------------|------------------------------|--|
| Estimated Fees ¹ | \$253,500 + \$1,000 per year | \$59,500² + 1,000 per year |

¹ Fees are approximate.

² Fee schedule would follow the bylaw up to 10,000 m³, and then a reduced EIF to \$0.20/m³ over 10,000 m³

- Site could be 'phased' – Phase 1 (e.g. 0 to 100,000 m³). Approval for Phase 2 (100,000 to 250,000 m³) contingent on Council inspection and approval.

Questions?



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