

Note that several comments in this chart were received before consultation sessions with the parties had taken place. Therefore, some of the comments were discussed and addressed in person at these sessions. However, these comments do remain in the chart and a brief response is provided for each.

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Community Planning)	General	The Living City Policy document is very thorough, well written and easy to understand. The background and basis sections are informative and present a strong foundation for later more substantive sections of the policy document.	Comment noted.	N
City of Pickering	General	It would provide greater clarity to users of the Living City Policies if links to other policy sections and other documents were readily accessible.	Links will be provided in the final version.	Y
City of Pickering	General	it would provide greater clarity to users of the Living City Policies if a compilation of the full set of proposed policies was provided.	Comment unclear.	N
City of Toronto (Planning)	General	Toronto City Planning strongly supports the following statement in the Summary Document (p. 5): "The foundation for the LCP is TRCA's mandate under the Conservation Authorities Act for the management of natural hazards and natural heritage in our watersheds and waterfront using a watershed-based ecosystem planning approach. The protection of valley and stream corridors through our [TRCA's] regulatory role remains as the primarily foundation for the LCP."	Comment noted.	N
City of Toronto (Water)	General	Given its antecedents, users would benefit from a concordance between the Living City Policies and the 1994 Valley and Stream Corridor Management Program document and the 2007 Planning and Development Procedural Manual to assist with transitioning to the new document.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP. Also note that the Procedural Manual will still remain relevant and is being updated with any new technical or procedural information as it becomes available. The Living City Policies will only supercede the VSCMP.	N

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City of Toronto (Water)	General	Review of the draft document did not lend itself to close scrutiny of each policy. Having said that, you may wish to ensure the policies align with the Provincial Policy Statement, which is presently under review. Furthermore, it is possible that the proposed Living City Policies could conflict with the City's Official Plan, particularly in relation to development and intensification vis-à-vis natural resource conservation. The potential level of conflict relates to whether the Living City Policies are discretionary or mandatory requirements. Additionally, as highlighted above and in City Planning's submission, it is not clear how policies that extend beyond the regulated area would apply within the City of Toronto.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP. As well, revisions have been made throughout the document to improve clarity as explained through responses to specific comments on roles.	N
City of Toronto (Water)	General	The expression "to the satisfaction of the TRCA" appears in a number of policies; however, the benchmark or criterion that is or should be used to demonstrate satisfactory achievement is not always apparent. Clarification about what "satisfaction" means in every context would improve the utility of the policies.	"To the satisfaction of TRCA" is used in the Chapter 8 Regulation policies and refers to the criteria in the policies, where TRCA is the decision maker. The use of this phrase in Chapter 7 is tied to our delegated responsibilities for natural hazards.	N
Township of Uxbridge	General	At the present time we do not have any specific comments and will support whatever position the Region is taking since we follow their O.P. for the rural areas of Uxbridge which is where most of the TRCA area falls.	Comment noted.	N
City of Vaughan	General	Is there a background document or appendix indicating where changes have been made from previous policy documents? This would be useful to understand the extent to which the LCP document is new as opposed to consolidating existing policies that have been approved by the TRCA Authority Board.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP.	N
York Region (Community Planning)	General	From our Regional role in the planning and development process, relative to the Memorandum of Understanding between the Region and TRCA, we see no issues with the proposed Living City Policy document.	Comment noted.	N

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York Region (Corporate/ Strategic/ Long Range Planning)	General	These comprehensive policies have the potential to provide improved consistency and transparency in TRCAs planning and regulatory process. Staff recommends that the TRCA consider a process for monitoring and measuring success which promotes continuous improvement and ensures the effective implementation of this document.	Staff experience in implementing the document will reveal the strengths and weaknesses of the policies. It envisions a 10-year life span so that evaluation and review will take place at that time. Before then, amendments to the document will be made where changes in legislation require, or where warranted through implementation.	N
York Region (Corporate/ Strategic/ Long Range Planning)	General	TRCA is encouraged to seek municipal council endorsement of this strategic document in a process similar to the one undertaken for the VSCMP.	In accordance with provincial guidance, as a CA policy document, The LCP only requires TRCA Board approval; further the TRCA Executive Committee and Authority Board is primarily made up of municipal councillors. Staff, however, acknowledge that municipal council endorsements are welcome as an added layer of support for implementing the policies in the document. Adoption of any of the policies from The LCP by municipalities in their official plans would be an even more helpful initiative.	N
York Region (Long Range Planning, Public Health, ES)	General	It would be helpful to have captions on the photos, as some can be unclear with respect to what they are portraying.	Captions will be added to the photos in the final version of the document.	Y
Town of Aurora	General	The vast majority of the watersheds within the Town of Aurora lie within the watersheds of LSRCA and therefore our interaction with your CA is very limited. In general, we are in agreement with the draft policies proposed in The Living City document as they reflect best practices regarding environmental planning and protection. Furthermore, there are no conflicts between the proposed policies and the policies contained within the Town's Official Plan. In fact, the proposed policies are in-line with the policies of the Town's OP and are complementary to the Town's environmental policies.	Comment noted.	N

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City of Brampton	General	The Living City Policies has integrated the Valley and Stream Corridor Management Program (VSCMP) which is excellent. However, given such a comprehensive document, it would be very helpful for TRCA to highlight those sections/policies that are new.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP.	N
Town of Caledon	General	The Town would appreciate the LCP including clarification as to what methods were used to harmonize, where possible, the policies set out in the LCP, with those of adjacent conservation authorities.	During the development of The LCP, other CAs' (recently approved) policy documents were consulted. Similar to the differing official plan policies of municipalities, policies across differing CAs are not harmonized but are consistent in that they are all in accordance with provincial direction, i.e., CALC chapter (Policies and Procedures for Conservation Authority Plan Review and Permitting Activities), Generic Regulation. Policies are meant to reflect each CA's watershed conditions, local policy framework and best management practices. As well, other CAs were invited to orientation sessions and to comment on The LCP as external stakeholders.	N
Town of Caledon	General	In Caledon over 260 properties have been identified as containing lands that are partially regulated by the TRCA and at least one other CA. The Town would appreciate the LCP including some formal direction as to how multi-authority properties are to be effectively, efficiently and equitably regulated.	On the issue of multi-CA regulated properties, consultation with TRCA's neighbouring CAs revealed that there is generally an informal (non-written) agreement between CAs that typically takes place that the CA with more of the regulated area on the subject property takes the file. This is current practice and, to our knowledge, has yielded no objections from municipalities or proponents.	N
King Township	General	Planning staff understands the Document will not have the effect of triggering an update to municipal official plans.	This is correct, however, The LCP can be used to inform future official plan reviews and updates.	N
City of Markham	General	The language of these policies should reflect TRCA's role as a commenting agency and should focus on 'encouraging and supporting' actions. The policies should also clearly identify 'who' the policy is directed at, the TRCA or municipality.	Revisions have been made throughout the document to improve clarity as explained through responses to specific comments on roles.	Y
City of Mississauga	General	A summary showing what specifically, or even generally, has changed relative to the previous version would be helpful to review from a City perspective.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP.	N

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Ministry of Municipal Affairs and Housing	General	Use more graphics to convey information.	More diagrams will be added to the final version.	Y
Peel Federation of Agriculture	General	The PFA objects to the general intent of the LC Policies to establish the TRCA separate from its member municipalities which make all board appointments and pay 98% of all costs through the municipal tax base.	The intent of the LC Policies is not to establish the TRCA separate from its member municipalities. The TRCA Board is comprised primarily of elected councillors from the participating municipalities. The TRCA Board has the responsibility and authority to approve programs and policies of the TRCA, including the LCP. The municipal levy is approximately 44%, not 98%.	N
Peel Federation of Agriculture	General	The PFA objects to the complete disregard for costs inherent in the LC Policies.	The costs to implement the policies in Sections 7 and 8 of the LCP are covered by planning and development review fees for planning, EAs and permits. The costs to implement the policies in Section 6 are funded by special grants, sponsorships and partnerships.	N
City of Pickering	General	It would provide greater clarity to users of the Living City Policies if each policy was fully numbered in the highlighted policy sections (i.e.: Policy 7.3.1 (a)), not just (a).	The main policy numbers will be added at the beginning of each policy box in the final version.	Y
Township of Adjala-Tosorontio	General	Many of the proposed policies are similar or are extensions to the TRCA's existing policies, updated to include legislation, policies and best practices enacted since the original 'Valley and Stream Corridor Management Program' (VSCMP) dated October 1994. There are no apparent conflicts between the Township OP and Zoning By-laws and the Living City proposed policies and as such, staff have no comments at this time. Staff would however, reserve the right to provide further comments at future releases of the Living City, during its public consultation process.	Comment noted. The Township will continue to be apprised of the consultation and revision schedule for The LCP.	N
York Region (Community Planning)	General	If appropriate, TRCA should consider adding expected response timeframes for the different review processes throughout the planning and development process.	This type of information is contained in TRCA's Planning and Development Procedural Manual.	N

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Building Industry and Land Development Association (BILD)	General	We acknowledge that this Report is the culmination of technical TRCA reports and studies, in conjunction with the provincial and municipal planning regime. Overall the Report is clear and well organized.	Comment noted.	N
Building Industry and Land Development Association (BILD)	1	<p>Further complexity is added to this Report in scenarios where direction has been provided by the TRCA's own reports and studies. Directions of the Report that fall under the purview of the TRCA should be designated within the "Guidelines" section for the final Report.</p> <p>BILD believes that clearer delineation between the two sets of direction needs to be addressed in the final Report as follows:</p> <p>(1) That the title of the draft Report "The Living City Policies" be changed to "The Living City Guidelines and Policies" to account for both sets of directions in this Report.</p> <p>(2) That in all instances where the term "policies" is used in chapter 6 and 7 of the Report. BILD request that term "policies" be changed to "guidelines". This will provide greater clarity for applicants, as well as the Conservation Authority and municipal staff.</p> <p>(3) Finally, the given "policies" and "guidelines" could be further differentiated by color or type font coding to create a consistent thread throughout the Report.</p>	<p>The Living City Policies (LCP) document is consistent with provincial direction to conservation authorities (CAs) to indicate to all stakeholders the roles and responsibilities of CAs in the planning and development process, through a set of publicly consulted-on policies that are approved by the Authority Board, (refer to "Policies and Procedures for Conservation Authority Plan Review and Permitting Activities"). To address your comment about greater clarity for applicants, TRCA and municipal staff, a section has been added to the beginning of Chapters 6 and 7 indicating how the policies in each chapter will be used, in accordance with our various roles as described in Chapter 3, i.e., Chapters 6 and 7 are recommendations to approval authorities. The new wording emphasizes the municipal decision making role in the planning process. Technical and procedural guidelines will remain in the TRCA Planning and Development Procedural Manual and other stand-alone TRCA technical guides, e.g., SWM Criteria Document, Headwater Drainage Features Guidelines, etc.</p>	Y
Building Industry and Land Development Association (BILD)	1	We appreciate that this will be a living document, whereby course corrections can be made to improve the Report as changes in policy regulations occur or as technology advances. We would request notification for any updates once this Report becomes final.	Any policy changes in the document would be consulted on publicly and vetted through TRCA's Board, as explained in Chapter 1 of The LCP.	N

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Building Industry and Land Development Association (BILD)	1	We kindly request notification for the final draft of the Report, prior to Authority staff seeking adoption by its Board in 2014.	Consultation on the development of the document will continue to be a public process until approval in 2014.	N
City of Toronto (Planning 2)	1	Chapters 6, 7, and 8 all contain the term "policies" in the title, and a number of topics are addressed in all three chapters. At our July 3 meeting, you characterized the content of the three chapters as relating to "suggestions", "recommendations", and "regulatory requirements". This was quite helpful and we suggest you consider re-naming the chapters and provide a description of what each chapter is intended to achieve in chapter 1.0.	We have added wording to the beginning of the policy chapters to further emphasize how the policies in each are to be used, in accordance with our various roles as described in Chapter 3, i.e., Chapters 6 and 7 are recommendations to approval authorities. The new wording emphasizes the municipal decision making role in the planning process. We've also added some more description to the chapter outline in Section 1.	Y
City of Toronto (Water)	1	The Living Cities Policies is intended to be a procedural manual to enhance TRCA's cooperative working relationship with its many municipal partners, so that implementation of TRCA's planning and regulatory functions are transparent and review processes are streamlined. It is imperative that the TRCA interpret and apply all of the policies equitably throughout its jurisdiction and this should be stated in the document.	The issue of applying all of the policies throughout TRCA's jurisdiction has been addressed in the applicability section of Chapter 1. TRCA's Planning and Development Procedural Manual, containing application procedures and technical guidelines and checklists, is separate from The LCP as explained in Chapter 1 of the draft policy document.	N
York Region (Long Range Planning, Public Health, ES)	1	Would recommend that each section be reviewed for organizational structure. Would reorder policies based on the following order: - Primary Objective/Goal/Aspiration - Required/Mandate/Legislative - Partner/Work with/Assist - Encourage/Advocacy	The policy chapters are organized based on CA role, in keeping with provincial direction. Individual sections have been reviewed to ensure consistent ordering and format.	N

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City of Toronto (Planning 2)	1.1	As stated in section 1.1, the draft LCP, when approved, will replace the October 1994 Valley and Stream Corridor Management Program (VSCMP). Based on our review and our discussions on July 3, we acknowledge your explanation that the LCP contains no significant changes that would affect how TRCA and City of Toronto currently work together, nor would the LCP require amendments to the Toronto Official Plan. However, the LCP policies are presented differently than the policies contained in the VSCMP which the LCP will replace. It is difficult to make a direct comparison between the two documents and understand the implications of new and updated requirements. To help reviewers understand any differences it would be helpful if TRCA would highlight the key differences between the VSCMP and the LCP policies.	Several key differences between the VSCMP and The LCP include: the incorporation of wetland and shoreline policies; policies for potential natural cover; and the separation of policies by conservation authority role. It is hoped that these differences have now been adequately highlighted in presentations and Board reports throughout the stakeholder consultation process. In addition, any new policies in the LCP are reflective of current practice and/or TRCA's watershed plans and technical guidelines, which have all benefited from their own stakeholder consultation.	N
York Region (Corporate/ Strategic/ Long Range Planning)	1.1	As articulated within the Purpose and Scope section, we confirm that the LCP <i>reflect and clarify the current practice of TRCA's role as a watershed and shoreline manager, regulator, commenting agency, service provider, and landowner in the context of the planning and development processes</i> . Accordingly, we don't anticipate that these policies will have an impact on the annual funding request of the TRCA. Your confirmation and/or clarification in this regard is appreciated. In addition, we recommend that the TRCA consider including a framework, or principles, which address the financial aspects of implementing these policies.	Conservation authorities have a legislated and mandated responsibility under the <i>Conservation Authorities Act</i> to have board-approved policies. Funding for this project and its implementation is part of TRCA's regular planning and development divisional budgeting process. A principle or framework for the financial aspects of implementing the policies is covered by the Business Excellence objective, stated in Chapter 5 of The LCP.	N
York Region (Long Range Planning, Public Health, ES)	1.1	Additional clarity needed around the purpose and scope of the document. It does state that LCP will supersede Sections 1 through 4 of the VSCMP. Could be strengthened to indicate that the document will be used by TRCA staff in fulfilling planning and regulatory responsibilities (similar to how these roles are explained on p. 1 of the Summary document).	This clarification has been added to 1.1 using the Summary document information on this.	Y

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Etobicoke-Mimico Watersheds Council	1.2	Planning and Development Procedural Manual is referred to through out the document, as a matter of reference this section should be expanded to give the reader a greater understanding of current practices and procedures regarding TRCA application review procedures and submission requirements regarding planning and permit applications. Possibly have this information referenced in the appendix as brief overview of the sections contained within the manual.	A link to the Procedural Manual will be added to the final version.	Y
Peel Federation of Agriculture	1.2	The PFA objects to the plethora of non-statutory documents used by staff to demand open ended permitting process for all initiatives deemed a development or site alteration. There must be regulatory clarity and a clear case to be met for proponents.	The Procedural Manual was approved by the TRCA Board with the purpose of providing greater clarity on TRCA's review procedures and to assist all stakeholders on how to meet the policies. The technical checklists and guidelines are intended to simplify for applicants the environmental requirements. Technical guidelines are based on best available science and many are subject to a stakeholder consultation process, prior to finalization and Board approval. The permit process is not open-ended as it is focused on development and construction.	N
Peel Federation of Agriculture	1.2	The PFA objects to the abandonment of legislative oversight of staff by the TRCA Board.	There is no abandonment of legislative oversight by the TRCA Board. Staff report regularly to the TRCA Board on new science and the development of technical guidelines that inform updates to the Procedural Manual. New policies or amendments are subject to stakeholder consultation and TRCA Board approval. Permits issued under Section 28 of the <i>Conservation Authorities Act</i> are subject to meeting Board approved policies; the Authority and Executive Committee Boards meet monthly to review and approve staff recommendations on permit applications.	N
York Region (Long Range Planning, Public Health, ES)	1.3	Consider creating a callout box for the applicability of the LCP.	The paragraph on applicability has been separated into its own section in order to make it more prominent.	Y

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Durham Region	1.3	The inclusion of a paragraph regarding transitional matters is supported; it clarifies which planning applications the policies apply to.	Comment noted.	N
Ministry of Municipal Affairs and Housing	2	Use different scales of maps - broader context map in Southern Ontario or Great Lakes.	We will consider adding a southern Ontario context map to the final version.	N
Ministry of Municipal Affairs and Housing	2	Knit together big geographies (i.e., Carolinian Canada, Niagara Escarpment, ORM, etc.)	Section 2 of The LCP describes the geography of TRCA's jurisdiction.	N
Ministry of Municipal Affairs and Housing	2	Show NHS through air photos, satellite images.	We will take this into consideration for the final version.	N
Ministry of Municipal Affairs and Housing	2	Greenfield growth still a big thing; seems downplayed in LCP due to intensification (60/40).	Agreed that greenfield development is still the prevalent form of development, however, The LCP contains policies that apply to both greenfield and redevelopment scenarios occurring in our jurisdiction.	N
Town of Caledon	2.1	Twp. of Adjala-Tosorontio (Simcoe County) and the Town of Mono (Dufferin County) are lower tier municipalities and should be listed in that group (p. 6). The first municipality list should be clarified as "upper tier or single tier municipalities".	The organization of the list of municipalities has been simplified.	Y
Niagara Escarpment Commission	Figure 2.1	Legend should be "Niagara Escarpment Planning Area".	This change has been made.	Y

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Town of Caledon	2.3	<p>The Town of Caledon recognizes that the challenges of redevelopment and intensification are key issues for the TRCA in the largely urbanized portions of its jurisdiction. However, the language and focus of Sections such as 2.3 appear to offer limited regard for the significance of development pressures and opportunities for increased natural heritage and natural hazard protection of headwaters that exist across the substantial rural "white belt" lands within the jurisdiction.</p> <p>The Town would appreciate the language of the LCP being updated to more clearly reflect the both the urban and rural challenges and opportunities that exist in the TRCA jurisdiction (increased setbacks). Perhaps it may be appropriate for the TRCA to consider developing distinct policies and standards that reflect the specific concerns of natural heritage and natural hazard protection in urban redevelopment areas separate from those of new development in the white belt.</p>	<p>Some wording has been added to in Section 2.3 explaining that there are opportunities for new development to protect and enhance the Natural System in the headwater areas of the "white belt". The policies for environmental planning in chapter 7 reflect the different landscapes of the jurisdiction (greenfield and redevelopment scenarios) given that they include both protection and management policies.</p>	Y
Ministry of Natural Resources	2.3	<p>Section 2.3 speaks to the Issues, Challenges and Opportunities and the Greenbelt Plan. Policy 7.2.1 refers to reviewing applications under the Planning Act in the context of the Greenbelt Plan. Is it the intent of the CA to align the regulatory approvals with the intent of the ORMCP/Greenbelt Plan (exclusive of a Planning Act application) for things other than setbacks (e.g., implementation of the Natural Heritage System Policies of Section 3.2.2 of the Greenbelt Plan)? Perhaps this was stated in the document and I simply missed it.</p>	<p>Policy 8.13.9 is based on a TRCA Board Resolution that stated that staff would, on a best efforts basis, ensure that regulatory decisions under our Section 28 Regulation be in conformity with the ORMCP.</p>	N
York Region (Long Range Planning, Public Health, ES)	2.3	<p>In reference to impervious surfaces (2), add "health hazards" to "increased flooding and erosion hazards". (Examples include housing issues such as mould growth and well water contamination after flooding).</p>	<p>Although mould and drinking water contamination are real health hazards associated with flooding this is not the appropriate paragraph to describe that. Instead, a mention of this has been added to the second paragraph in section 6.2, since it deals with public health issues.</p>	Y

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York Region (Long Range Planning, Public Health, ES)	2.3	Identifies the need for Natural Cover and importance of distribution and quantity of that cover to the Natural System. I don't see where the Natural Cover targets are included as policy in the LCP? Should these targets be included as policy.... work to achieve? (p10)	The intent of the Natural System policies is to achieve these targets in collaboration with municipalities through their official plan policies and mapping for natural heritage.	N
York Region (Long Range Planning, Public Health, ES)	2.3	In reference to potential effects of climate change and public health challenges, add "air quality, water quality, food safety and security, and infectious diseases" (p. 10).	Challenges of poor air and water quality have been added to this description of climate change impacts. Section 6.2 on climate change has been revised to incorporate the impact to crops and already mentions the potential for new diseases.	Y
Building Industry and Land Development Association (BILD)	3	Chapter 3 of the Report does a great job of outlining the role of the Authority under each scenario. This clear delineation needs to be threaded throughout the entire Report.	Wording has been added to the beginning of each policy chapter to emphasize how the policies in each should be used.	Y
City of Brampton	3	TRCA notes its many roles including as a proponent and/or landowner. As clarified in CVC's Watershed policies, Sec. 2.1.2.1, the CA needs to recognize where there may be a real or perceived conflict of interest between the role of the CA as a proponent or landowner, and the role of the CA as a commenting agency. In this regard, CVC has stipulated that the CA may request the planning authority to implement alternate review mechanism to address the CA's commenting responsibilities. This is an issue TRCA's LCP should address.	This wording is in Section 3.2.1 of The LCP under the heading, Landowner.	N

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City of Toronto (Planning 2)	3	<p>Describes the legislative basis for TRCA's mandate, including its role as a commenting agency. Within this context, it would be helpful to explain the working relationship between TRCA and its municipal partners as well as the circumstances under which TRCA's authority overrides that of municipalities. For example, page 16 contains the statement that "TRCA comments according to its Board-approved policies as a local resource management agency to the municipality/ planning approval authority..."</p> <p>The statement is made in the context of municipal policy documents and planning and development applications, but does not describe the conditions under which TRCA approval or permitting is required. This would be a useful addition to this chapter and could be accomplished by organizing the information in Tables 3.1 and 3.2 to indicate cases when:</p> <ul style="list-style-type: none"> • TRCA approval is required; • Approval by TRCA, as a delegated authority, is required; and, • TRCA suggestion/guidance is offered. 	<p>The table 3.1 has been modified to provide clarity.</p> <p>Table 3.2 already explains TRCA's roles, including when TRCA's regulatory approval is required.</p>	Y
Peel Federation of Agriculture	3.1	<p>The PFA objects to TRCA's disconnections from natural resources as the core focus of its Section 20 objects.</p>	<p>TRCA's core focus remains on the management and protection of natural resources (chapter 7 & 8 policies). Other activities (chapter 6 policies) are indirectly related to the core focus and are undertaken with willing partners.</p>	N
Peel Federation of Agriculture	3.1	<p>The PFA objects to the lack of a concise program for TRCA and the clear disregard for the fundamental legislative requirement for a program under Conservation Authorities Act, Section 20, Objects.</p>	<p>The Living City Policies (LCP) is a consolidation of TRCA programs, policies and current practice related to our role in the planning and development process since the approval of TRCA's Valley and Stream Corridor Management Program (VSCMP, 1994), which currently serves as the main policy document. The LCP is consistent with the provincial document, titled "Policies and Procedures for Conservation Authority Plan Review and Permitting Activities."</p>	N

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York Region (Long Range Planning, Public Health, ES)	Table 3.1	It is unclear what is meant by "technical clearance" as it relates to the Provincial Plans, further clarification should be provided within the note at the end of the table.	This term represents CA's technical advisory role to municipalities for conformity with Provincial plans, in accordance with provincial direction (CALC chapter - Policies and Procedures for Conservation Authority Plan Review and Permitting Activities) and typically within the context of our municipal Memorandums of Understanding.	N
Etobicoke-Mimico Watersheds Council	Figure 3.1	There is no mention of the role that the TRCA plays with respect to development applications appealed to the OMB, as for better or worse the OMB plays an integral role in land use planning issues.	Participation at OMB hearings is outside the scope of this general diagram but there is a policy on environmental tribunals in the Planning chapter (7.5.2 p).	N
City of Vaughan	Figure 3.1 and Table 3.2	Watershed Plans are noted as mandatory by the CA Act in Figure 3.1, but then lumped with the other TRCA documents as the end of Table 3.2. Shouldn't watershed plans be identified as a particular kind of TRCA document different from best practices guides such as the LID Design guide or Headwater Drainage Features guideline? I assume that watershed plans have more status than best practices guides.	This part of Figure 3.1 is meant to portray that CAs get their legislative authority to undertake watershed plans from the <i>Conservation Authorities Act</i> . They include best management practices and recommend watershed management strategies, similar to best practice guides. Watershed plans have been separated out and moved up in Table 3.2 to provide more clarity around them.	Y
Peel Federation of Agriculture	Table 3.2	<ul style="list-style-type: none"> The PFA objects to the review of Fisheries Act without full compensation and resources supplied by the federal government. The PFA objects to any suggestion TRCA is a decision maker with jurisdiction under the Fisheries Act. 	TRCA was not a decision maker under the Level III Agreement with DFO. The Agreement ended as of November 30, 2013. References to the <i>Fisheries Act</i> in The LCP have been amended to reflect this change.	Y
City of Vaughan	Table 3.2	Perhaps Table 3.2 can be separated into two tables: one for federal and provincial legislation and/or regulations; and one for TRCA policy documents. If so, then the table of TRCA policy can include an additional column that identifies if the measures are: mandatory; suggested best practices; intended for incorporation into municipal OPs, by-laws and/or standards, etc.	The chart is currently organized by level of government. With respect to identifying commenting roles, we trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP. As well, revisions have been made throughout the document to improve clarity as explained through responses to specific comments on roles.	N
City of Markham	Table 3.2	References "Rouge Park Alliance" which no longer exists as a management agency (page 21).	At present, TRCA (Board and staff) is the Interim Manager of Rouge Park until the Rouge National Urban Park is established by Parks Canada. We have removed reference to Rouge Park Alliance.	Y

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City of Markham	Table 3.2	Terrestrial Natural Heritage System Strategy identifies "as it is anticipated to be incorporated into Official Plans". We suggest "as it is anticipated to be used by municipalities and considered in the development of local natural heritage systems". In this regard, there does not appear to be clear policy around the TRCA TNHSS as their guiding tool for the identification of the Natural System. It would be helpful to have policy around this.	The wording in Table 3.2 has been modified to be more clear about the TNHSS's role in developing municipal natural heritage systems. Policy 7.3.1 g) points to the TNHSS as a tool for developing municipal NHSSs.	Y
Ministry of Municipal Affairs and Housing	Table 3.2	Not comprehensive - move to Appendix? Add caveat "refer to Legislation" as not all subtleties are captured.	There is a caveat at the end of Table 3.2 stating that it should not be relied upon for complete legislative information. We feel that this table fits well within this chapter on TRCA's legislative foundation. However, we have moved the caveat up to the introduction for the table to indicate that it is only a general summary.	Y
Peel Federation of Agriculture	3.2	The PFA objects to the lack of balance seeking inherent in the LC Policies.	TRCA's role as a commenting agency is to safeguard environmental interests, resulting in recommendations to municipalities who, as the planning approval authority, have the responsibility to balance environmental, social and economic interests according to their official plan policies. In its regulatory role, TRCA can only make decisions based on the 5 tests in the <i>Conservation Authorities Act</i> .	N
Peel Federation of Agriculture	3.2	The PFA objects to the decision making role, assumed through practice, of TRCA under the Planning Act.	TRCA does not assume the decision making role under the Planning Act. Table 3.1 has been amended to provide clarity for the CA role in the planning process. Similarly, amendments have been made in several places in chapter 7 to clarify this.	Y

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Peel Federation of Agriculture	3.2.1	<ul style="list-style-type: none"> The PFA objects to the murky distinction between conservation authority "commenting" role and provincial "responsibility" role. The PFA objects to the unauthorized extension of TRCA "commenting" role to include PPS Section 2.1 Natural Heritage through the LC Policies. The PFA objects to the ultra vires authorization by Conservation Ontario of the MoU between MNR, MMA&H & Conservation Ontario, Jan. 19, 2001 	<ul style="list-style-type: none"> Table 3.1 has been amended to provide greater clarity with regard to CA role. This role is clearly authorized through the provincial document titled "Policies and Procedures for Conservation Authority Plan Review and Permitting Activities". Further, this has been defined and operationalized through memorandums of understanding (MOU) with our municipal partners. This comment is beyond the scope of the LCP to address. 	Y
Niagara Escarpment Commission	3.2.1	<ul style="list-style-type: none"> The Commission would like any references in the document to the Niagara Escarpment Plan to refer to the date "2005" which was the date that the NEP was approved. This is contrary to what was written in staff's editorial comments provided to you. Table 3.2 (p. 18): 1st column should be "Niagara Escarpment Planning and Development Act and Plan (2005)". The 3rd column should be "Niagara Escarpment Development Commission..." 	NEP Act references have been modified in keeping with NEC comments.	Y
Ministry of Municipal Affairs and Housing	4	Likes this section but should it come first or be moved to Appendix as it detracts from the policies.	Chapter 4 is important for setting the historical context and TRCA's evolution to The Living City.	N
City of Markham	5	Strategic Objective 1: Healthy Rivers and Shorelines notes that the objective is to restore the integrity and health of the region's rivers. Should this objective also address enhancement?	The wording of the Strategic Objectives was endorsed by TRCA's Board along with the Vision and Mission. We also note that enhancement could be captured under the terms integrity and health.	N
City of Markham	5	Strategic Objective 2: This objective speaks to protecting and restoring the systems of the natural areas. Is there a reason why the objective does not include water quality?	Water quality is captured in objective 1, where it refers to the integrity and health of the region's rivers.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	5	Principle 4: This principle suggests the protection of life and property from flooding is dependent on the management of the natural heritage system. Markham has flooding conditions resulting from insufficient man made conveyance systems outside of the valleyland system. These may require upgrades, rather than just protection or restoration. Perhaps this should also be addressed.	Acknowledged, however, this issue is covered in Principle 6 and by the term remediation in Principle 4; i.e., remediation often entails the upgrade of conveyance systems. Principle 4 also uses the term "Natural System" as opposed to just natural heritage system and therefore includes a natural hazard component.	N
City of Markham	5	Principle 5: More details and discussion is required on the interpretation of "incremental changes".	This principle builds upon a similar one in the VSCMP. The interpretation of the level of impact from an incremental change is often discussed in detail through plan review.	N
City of Markham	5	Principle 7: "...to incorporate innovative community design that maximizes long term economic, social, cultural, and environmental benefits." There should be a goal of net overall benefits. Perhaps the use of the word "optimizes" instead of "maximizes" is more appropriate and achievable.	In Principle 7, the word "maximizes" has been changed to the word "optimizes".	Y
City of Markham	5	Principle 8: This principle references "adaptive watershed management", which should be defined or explained as it is not a commonly used term. This principle is based on parameters that are difficult or impossible to measure, e.g., potential impacts of urbanization and climate change. While climate change was mentioned throughout the document, the TRCA is still designing for 100-year and Regional storms. Increase in flooding due to climate change can only be addressed through scientifically acceptable studies, standards and guidelines backed by approvals from municipalities and agencies like the MOE.	Adaptive watershed management is adaptive management applied at the watershed scale. The LCP Glossary provides a definition for adaptive management.	N
City of Markham	5	Principle 9: This principle references "greenlands system" while the policies reference "natural system". There should be consistent references in the document to prevent confusion.	Greenlands refers to a connected system of parks and open space which may contain components of the Natural System (natural habitats as indicated), but the two would not be interchangeable.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Federation of Agriculture	5	The PFA objects to the Living City Vision as it fails to reflect the legislative requirement for a program designed to further the conservation, restoration, development and management of natural resources.	The Living City Vision was endorsed by the TRCA Board in 2003. The Living City vision is based on a natural foundation of healthy rivers and shorelines, greenspace and biodiversity and sustainable communities (strategic objectives tied to further the conservation, restoration, development and management of natural resources). The LCP is a consolidation of TRCA programs related to our role in planning and development and working with our partners and the community to achieve the Living City Vision.	N
Peel Federation of Agriculture	5	The PFA objects to the TRCA's lack of a clear, operational state of nature vision for its jurisdiction.	The Vision is further defined through the 4 Strategic Objectives, the 9 Principles and operationally through the chapter 7 environmental planning policies and chapter 8 regulation policies.	N
Town of Ajax	5.2	Additional language should be incorporated which addresses the core values of protection, restoration and enhancement.	Wording in Chapter 5 has been updated to reflect new descriptions of TRCA's outlook for the near future found in the newly approved 10-year Strategic Plan. TRCA's Strategic Plan can be accessed from the home page of the TRCA website.	N
Ministry of Municipal Affairs and Housing	5.2	Business Excellence: Where did this come from?	TRCA's four strategic objectives, mission, and vision for The Living City were endorsed by TRCA's Board in 2003. The strategic objective of Business Excellence has been further defined through TRCA's new Strategic Plan, endorsed by the Board in 2013.	N
Cycle Toronto Ward Groups	5.3	Sustainable Communities - A truly comprehensive approach gathers into the TRCA fold both the human and natural spheres. It is also commendable to emphasize sustainability as it relates to the City of Toronto, and not just nature.	Comment noted.	Y
Town of Ajax	5.4	Fundamental Principles should also be incorporated as follows: <ul style="list-style-type: none"> • Unnecessary or premature expansions of urban uses into the rural landscape will not be supported; • The extension or expansion of Infrastructure that results in the degradation of Natural Systems will not be supported. 	These are policy topics rather than principles and are addressed in policies 7.2.4 (d) and 7.5.2.2 (a) (urban boundary expansions) and under policies in sections 7.4.4 and 8.9 (Infrastructure).	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Cycle Toronto Ward Groups	5.4	Principle 9: It almost goes without saying that a conservation authority will protect natural habitats; inclusion of "scenic public places" is also appreciated, because notable landscapes are rare in a big city and they should be maintained for the public to enjoy.	Comment noted.	N
Durham Region	5.4	It is suggested that Principle 2 be reworded in order to clarify it's [sic] intent (e.g. consider deleting the phrase "to promote a culture of conservation").	The term "culture of conservation" comes from Section 4.2.4 of the Province's Growth Plan (Consolidation, 2013) which aligns well with TRCA's interests of conservation for water, energy and cultural heritage.	N
City of Markham	5.4	Principle 2: "The design of sustainable communities is based on the inter-dependent relationship between humans and the environment..." Perhaps this principle could be clearer. While the inter-dependent relationship is important, this is not the only factor in the design of sustainable communities. The design of sustainable communities is based on many factors such as the mix of land uses, availability of all modes of transportation, etc. To say it is only based on the relationship between humans and the environment ignores all the other important factors.	The principles express TRCA's perspective that the health of the environment is critical to healthy and sustainable communities.	N
Town of Richmond Hill	5.4	The principles are generally well thought out, comprehensive and supportable. Principle 2 is a bit of an exception to this general comment- it doesn't really make sense (grammatically) and its intent (beyond the idea of "promoting a culture of conservation") is therefore somewhat unclear. Principle 1 refers to a healthy "natural heritage system" and "water resource system" however, neither of these terms are defined in the glossary. Should this principle not refer to the "natural system" (as the remainder of the document does)? And, perhaps "water resource system" should be defined in the glossary.	Natural heritage and water resources are components of the Natural System and are both described throughout the document.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Ministry of the Environment	5.4	<p>MOE appreciates that principle 3 acknowledges the importance of science-based, integrated watershed management. We also noted the reference to considering cumulative impacts over time in principle 5. Consideration could be given to including somewhere in the principles, inclusion of the concept of adaptive management and ongoing monitoring and reporting to help bolster these important references.</p> <p>Generally speaking, the principles outlined in Section 5 are high level, and aspirational in nature. MOE requests clarification on the principle that references a "collaborative approach" among TRCA and its partners to incorporate innovative community design that maximizes long term economic, social, cultural and environmental benefits. This statement could perhaps benefit from some clarification as which partners the TRCA is anticipating collaborating with (i.e. municipalities, province, federal government). It could also be stated more broadly as a general principle on collaboration to achieve the overall goals and objectives of the strategy, and not just focussed on the innovative community design component.</p> <p>Some other suggestions of concepts or references that could be included are: air quality, protecting drinking water (references water resources only), the importance of Great Lakes, and the protection and enhancement of habitat and biodiversity.</p>	<p>The concept of adaptive management is referred to in Principle 8. TRCA partners with many different organizations both private and public such as all three levels of government, the development industry, the retail industry, NGOs, agricultural and watershed interest groups. Each principle is specific to a topic area that is relevant to achieving the overall goals and objectives of the entire document; Principle 7 is specific to innovative community design given that TRCA must collaborate with the development community and approval authority partners in order to optimize benefits that are of interest to all partners in the planning and development process.</p> <p>The topics, terms and concepts described through the principles as drafted capture your suggestions in a general way, for instance: climate change (air quality), water resource system and integrated watershed management (protecting drinking water and the Great Lakes), natural heritage (habitat and biodiversity).</p>	N

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Peel Region	5.4	While the principles of Section 5 are generally supported as an overarching set of directions forming the foundation of TRCA advocacy, planning and regulatory roles and responsibilities, we note the absence of any specific principle referencing agriculture within the watersheds. While TRCA's role in near-urban agriculture on its own lands as highlighted, largely the document does not speak to the broad food and farming sector throughout both the urban and rural areas within TRCA's jurisdiction.	The value of agriculture on both urban and rural lands, is highlighted in section 6.6 and in section 6.10.	N
City of Pickering	5.4	Agree with all the principles.	Comment noted.	N
City of Toronto (Water)	5.4	The principles in Section 5 of the draft policy document serve as an overarching set of directions forming the foundation of TRCA's advocacy, planning, and regulatory roles and responsibilities, and appropriately support the strategic objectives of healthy rivers and shorelines, green space and biodiversity, and sustainable communities.	Comment noted.	N
City of Vaughan	5.4	Have the nine principles been previously published in a strategic plan document that has been made available for public comment? There is not a reference in this section to a previously published document. If this information is being presented for the first time in a public document, then it requires some explanation to illustrate how the Vision and Mission flow to the strategic objectives and principles.	TRCA's Board report on the vision, mission and strategic objectives, as well as the Valley and Stream Corridor Management Program, were all used to form this section and are all public. As well, the principles are reflective of current practice.	N
City of Vaughan	5.4	<u>Principle 6:</u> consider including a note that development and redevelopment should contribute to maintaining and/or restoring natural environmental flows in addition to the outcomes noted. The watershed plans for the Humber and Don Rivers have emphasized natural environmental flows as a "coarse-filter" ecological approach, such as to dampen the "flashiness" of flow regimes responding to rainfall events.	Agree, however, these details are captured within the general wording of principle 6 and principle 4.	N

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York Region (Long Range Planning, Public Health, ES)	5.4	<ul style="list-style-type: none"> • <u>Principle 7</u>: include "health" along with "economic, social, cultural and environmental benefits" of innovative community design. • Recommend a graphic on p. 31 that identifies TRCA partners. 	Social benefits include health benefits. Throughout the document, the range of TRCA's partners is identified.	N
Cycle Toronto Ward Groups	5.4	<u>Principle 9</u> : This point should recognize the trail network that passes through natural habitats. Trails are for more than recreation they are also for active transportation uses, and can function as a key component of a multimodal transportation network.	The point about active transportation is in policy 6.4.1 c); the principles are more general than the policies. However, your comment will be passed along to TRCA staff currently developing a trail strategy.	N
Town of Aurora	6, 7	The majority of the policies found in Chapters 6 and 7 are general in nature and the Town is supportive of the draft policies. The policies regarding buffers for environmental features are consistent with the prescribed Provincial requirements and are therefore consistent with the buffers in the Town's OP.	Comment noted.	N
York Region (Community Planning)	6, 7, 8	Yes, the goals, objectives, and policies in sections 6 through 8 are clear and comprehensive. The policy subsections are well organized, progress in a logical manner, and easy to follow.	Comment noted.	N
York Region (Community Planning)	6, 7, 8	Yes, the preambles to the policies in sections 6 through 8 provide sufficient background information and rationale for the policies. This is one of the major strengths of this policy document. The detail and "storytelling" provide a better understanding behind the spirit and intent of each policy section. The sidebar texts also provide excellent examples of TRCA's successes, and highlights programs and initiatives relevant to a particular policy section.	Comment noted.	N
Town of Ajax	6	Does the TRCA have best management practices for rear yards next to Natural Systems (i.e. pools, accessory structures, maintenance, access etc.). Should they be included in this document?	Yes, our Education and Outreach programs provide this information through community interaction and the TRCA website. Chapter 6 of The LCP contains a policy for planning and development staff to recommend this information be contained in a brochure distributed to new developments abutting natural areas; this also reflects current practice.	N

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Cycle Toronto Ward Groups	6	<p>7. Parallel options: At times, on street bikeways parallel or in the same vicinity to trails will benefit cyclists (especially in the winter when unmaintained trails are difficult to cycle along). However, the biking community must receive a guarantee that, as a result of these parallel facilities being built, cycling will not lose its Preferred Activity status on the trails.</p> <p>8. Intersections: where trails intersect roads that carry automobile traffic, extensive markings (such as dense sharrows or zebra stripes) should be applied in order to indicate the presence of the trail connection to all users. Signalized crossings are appropriate for arterial roads.</p> <p>9. Access points: trail should be accessible at various points along its length; access points should be as cyclist friendly as possible; every attempt should be made to not require dismounting.</p> <p>10. Access updates: Trail condition and construction updates should be posted on a website as well as on signs located at trailheads and access points in proximity to the affected part of the trail.</p> <p>11. Winter maintenance: trails should be designed in a way to facilitate snow removal; trails should be properly maintained all year long; access points need to be included in winter maintenance plans.</p> <p>12. Surface maintenance: trails should be designed to avoid water ponding, flooding, and ice formation; paving should be kept in a smooth state.</p>	<p>Level of detail outside the scope of policy document. Comments will be passed along to TRCA Conservation Lands staff responsible for trails on TRCA-owned lands, and who work in partnership with municipalities and user groups in their trail design, planning, implementation and management; also, TRCA Trail Strategy currently being developed by Conservation Lands staff will also look to incorporate your comments where possible.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Cycle Toronto Ward Groups	6	<p>18. Stewardship: Involve cycling organizations in trail stewardship initiatives, and recognize stewardship opportunities that target trail users. Expand stewardship beyond the existing park and trail cleanups and naturalization efforts.</p> <p>19. Education: Partner with organizations providing trail user education, especially around trail safety including general cycling as well as mountain bike safety training. Support trail etiquette and safe use programs.</p> <p>20. Rest areas: all with seating, garbage, and information signage; selected areas also to have bicycle service stations, water fountains, and bike parking</p> <p>21. Bike art: public art commissions along trails should reflect the use of trails as cycling routes.</p> <p>22. Trail name: remove the word "Recreational" from all trail names. It does not accurately reflect one of the primary uses of trails, for active transportation.</p>	<p>Level of detail outside the scope of policy document. Comments will be passed along to TRCA Conservation Lands staff responsible for trails on TRCA-owned lands, and who work in partnership with municipalities and user groups in their trail design, planning, implementation and management; also, TRCA Trail Strategy currently being developed by Conservation Lands staff will also look to incorporate your comments where possible.</p>	N
City of Brampton	6	<p>The document needs to be clearer in qualifying the application of policies, i.e. those that apply strictly to TRCA lands, buildings and programs; policies that advocate or advise; or when TRCA will require, prohibit and/or restrict development, site alteration, etc. As an example, in what capacity will TRCA work with municipalities regarding Sec 6.7.1 (c) indicates "to work with municipalities, the building industry and other stakeholders to implement green infrastructure through land use planning for development patterns, and site and building design".</p>	<p>Revisions have been made throughout the document to improve clarity as explained through responses to specific comments on roles.</p> <p>An example of implementation of policy 6.7.1 c) is for TRCA to work with municipalities to allow low impact development technologies to be eligible for SWM credit under their municipal standards.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	6	We find the document unclear as to what form the TRCA's advocacy role will take (i.e., the "how").	We trust that this has been rectified through presentations at orientation and consultation sessions on The LCP. As well, revisions have been made throughout the document to improve clarity as explained through responses to specific comments on CA roles. For example, a section has been added to the beginning of Chapters 6 and 7 indicating how the policies in each chapter will be used, in accordance with our various roles as described in Chapter 3, i.e., Chapters 6 and 7 are recommendations to approval authorities. The new wording emphasizes the municipal decision making role in the planning process.	Y
Central Lake Ontario Conservation	6	It would be more fitting to rename Section 6 policies to objectives, as most of the topics are not directly regulated by the Conservation Authorities.	The chapter 6 policies are written in a manner that reflects TRCA's advocacy role in these areas.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Ministry of the Environment	6	<p>The concept of ecosystem services or ecological benefits could be explored as one of the strategic paths and an organizing principle in Section 6. This concept could prove to be an organizing principle for some of the more detailed policies and activities that are outlined in later sections of the strategy. On a similar note, the concept of biodiversity could also be considered for inclusion.</p> <p>Consideration could be given to the outline/ structure of Section 7 to make a clearer link to the strategic ‘paths’ in Section 6 and the more specific environmental planning policies, if possible.</p> <p>Not all the policies in section 6 have the same level of information. It could be useful to have more information, including specifics to what TRCA is currently doing and what partners are doing (for example, the PPS is referenced in a few places which is helpful, but is missing from the discussion on green infrastructure, climate change). A clearer rationale for the proposed policies may also be useful in this section.</p>	<p>Chapter 6 policy topics have a broader reach than the concept of ecosystem services that can come from the natural and built environments. However, the concept of ecosystem services is an organizing principle for Chapter 7 as suggested (see introduction to chapter 7) and the concept of biodiversity is described in the opening paragraphs of section 7.3.1.</p> <p>The outline of Chapter 7 reflects TRCA's role in environmental planning as a public commenting body, in the areas of natural hazards, natural heritage and water management. The link between Chapters 6 and 7 is highlighted in the second sidebar/callout box in section 7.1 This describes how the chapter 6 policies can be used to complement the environmental planning policies in Chapter 7.</p> <p>In the final document, the projects mentioned will have links so that further information on them can be found.</p> <p>The preambles for each policy sub-section in Chapter 6, as well as introduction to the entire section (6.1), provides the rationale for the proposed policies .</p>	N
Peel Federation of Agriculture	6	<p>The PFA objects to the expansive role assumed by TRCA, far from the legislative requirement for, "...a program designed to further the conservation, restoration, development and management of natural resources..."</p>	<p>The topic areas outlined in Chapter 6: Policies for Sustainable Communities can all affect, either directly or indirectly, the quality of the natural terrestrial environment and water resources.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Federation of Agriculture	6	The PFA objects to the substantial duplication of costs to be born by the property taxpayer for TRCA to undertake activities in land use planning, air quality, agriculture, waste management, fish habitat, Lake Ontario, energy, transportation, cultural heritage beyond TRCA properties, etc. which are all Provincial, Federal and Municipal jurisdictions.	Section 6.1 states that "TRCA functions as a scientific resource, a collaborator and supportive implementer in the planning and development of sustainable communities." In the topic areas described, TRCA works as a collaborator with willing partners and funders who see value in the services that TRCA can provide to help them address these issues in the most cost-effective ways possible.	N
City of Vaughan	6	The TRCA plays an important role in sustainability by facilitating research, ensuring the spread of information on best practices and supporting municipalities in the development of their sustainability measures. Use of the word "advocate" should be used with discretion, especially as it applies to relationships with municipalities. While of similar meaning, "support" might be the better word to be used when working with many GTA municipal governments, especially when many are and have developed sophisticated levels of expertise and policy covering the various aspects of sustainability. Using the term advocate, could give the impression that the municipalities are not taking the initiative in developing sustainable measures across a range of disciplines.	Agree with the comment, however, the policies in section 6 do use the word "support" much more than the word "advocate".	N
Durham Region	6	Section 6 of the document includes policies that address sustainable communities. The Regional Official Plan (ROP) also includes policies regarding healthy and sustainable communities. The TRCA's policies will support the implementation of the ROP policies.	Comment noted.	N

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City of Toronto (Planning)	6	The draft LCP includes policies which apply beyond the regulated area. Chapters 6 and 7 include policies that apply to green buildings, energy and transportation and to natural features and areas. At this time, it is not clear how policies that extend beyond the regulated area would apply within the City of Toronto and what mechanisms in the planning and development process would be used to implement these policies. We would like to better understand how these policies would apply so that we can determine whether there are any potential inconsistencies between the draft LCP and Official Plan policies and if any changes are needed to our application circulation procedures.	The separation of policies into chapters by conservation authority role, was explained through the consultation process with all stakeholders and with the City at our consultation on July 3, i.e., advocacy (Ch. 6), public commenting body (Ch. 7), regulator (Ch. 8). Also discussed was that there will be no changes needed to the application circulation procedures between the City and TRCA. In addition, a section has been added to the beginning of Chapters 6 and 7 indicating how the policies in each chapter will be used, in accordance with our various roles as described in Chapter 3, i.e., Chapters 6 and 7 are recommendations to approval authorities. The new wording emphasizes the municipal decision making role in the planning process.	Y
City of Toronto (Water)	6	The expression "it is the policy of TRCA: to work with municipalities" is used with many of the policies. It is not clear how much strength is attached to this intent, or whether municipalities can disregard TRCA's policies. Given that TRCA's roles include watershed agency, delegated and mandated regulator, and technical advisor to municipal partners, it is often not clear where TRCA will expect compliance and where the policies are suggestions. It would be helpful to indicate this.	We trust that this has been accomplished through presentations at orientation and consultation sessions on The LCP. As well, revisions have been made throughout the document to improve clarity as explained through responses to specific comments on roles.	N
York Region (Long Range Planning, Public Health, ES)	6	In general, The Living City Policies aligns with: <ul style="list-style-type: none"> • Public health goals and mandates as outlined in the Ontario Public Health Standards 2008. These include: "to reduce the burden of preventable chronic diseases of public health importance" (cardiovascular disease, cancer, and respiratory disease) and "to prevent or reduce the burden of illness from health hazards in the physical environment" (water quality, air quality, climate change.) • The York Region Official Plan in the areas of creating sustainable, complete communities including the protection and enhancement of our natural heritage and hydrologic resources. 	Comment noted.	N

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York Region (Long Range Planning, Public Health, ES)	6	We are happy to see that there are a number of policies in The Living City Policies that aim to reduce health risk factors related to the built and natural environment including policies on: water quality, groundwater and surface water protection, flooding, stormwater management, climate change, extreme heat events, flooding, vector-borne disease risk factors, air quality, energy conservation and transportation infrastructure.	Comment noted.	N
Don Watershed Regeneration Council	6	Generally the policies indicates that partners were municipalities. My only suggestion is that the province (as the legislative authority) could be also considered a partner and also encouraged to amend legislation where further progress/enhancements are needed. One example might be enhancing the Ontario Building Code (and its interpretation by municipal building officials) to better accommodate emerging green and passive energy saving techniques and practices.	Municipalities are our main partners, however, we do consider the Province a partner and the advocacy policies in Chapter 6 captures this by referring to TRCA working with municipalities, the building industry and other stakeholders.	N
Ministry of the Environment	6.1	Section 6 provides a good overview of the "paths" that the TRCA is following to realise the sustainable community objectives outlined in the strategy. Based upon a quick review of these "paths", MOE staff have noted that it appears to represent a comprehensive list of strategic objectives.	Comment noted.	N
Etobicoke-Mimico Watersheds Council	6.1	This document makes no mention of the URV inclusion as part of the Ontario Greenbelt. Why?	URV reference not appropriate in Chapter 6, however, a reference has been added to Section 7.2.1.	Y
Town of Ajax	6.1	Sustainable communities should be defined for the purposes of this document.	One, accepted and general definition of sustainable communities is not readily available on the Ontario government website or on the OPPI website. Most descriptions of the term relate back to the definition of sustainable development - develop with respect for current and future generations.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	6.2	Should also acknowledge that urban form influences greenhouse gas emissions through reliance on automobile modes of travel and factors that affect travel convenience and distance. Acknowledgement of the urban heat island effect should also be identified.	These points are expressed in the Sustainable Transportation (6.4) and Green Infrastructure (6.7) sections.	N
York Region (Long Range Planning, Public Health, ES)	6.2	<ul style="list-style-type: none"> • Include reference to the Province of Ontario's Climate Ready: Ontario's Adaptation Strategy and Action Plan 2011 - 2014 to ensure the policies align. • The document could reference the Adapting to Climate Change in Ontario Report of the Expert Panel on Adaptation: "Heat-related mortality could double in southern and central Ontario by the 2050s, while air pollution mortality, compounded by warmer summer temperatures could increase about 15-25% during the same interval." (http://www.ene.gov.on.ca/stdprodconsume/groups/lr/@ene/@resources/documents/resource/std01_079212.pdf) <p>Include more climate resilient infrastructure examples in addition to green buildings and green infrastructure, for example cool pavement technologies to address urban heat islands.</p> <ul style="list-style-type: none"> • Where possible include metrics to calculate the benefits of green infrastructure e.g. energy calculators, iTree, ENViMET. • Suggest identifying public health units as potential collaborators for specific policies as appropriate (e.g. 6.2.1 (d/e), 6.5.1 (d), 6.8.1, 6.10 (a), 7.4.3.1 (f)). • Suggest identifying the Clean Air Partnership (CAP) and the GTA Clean Air Council as potential collaborators. This group signs on to the annual Intergovernmental Declaration on Clean Air which includes commitments that align with many policies outlined in The Living City Policies document. 	<ul style="list-style-type: none"> • The Action Plan and the Ontario Report mentioned contain information on the importance of adapting for the impacts of changing weather patterns and identifies conservation authorities and municipalities as crucial partners in the process; the policies certainly align with these messages. <ul style="list-style-type: none"> • Thank you for the suggestions for metrics tools and potential partners - this information will be useful to TRCA staff that undertake monitoring, evaluation and partnership projects. Green buildings and green infrastructure would include cool roofs, pavements, etc.; overall, this information is too detailed for a policy document and rests in STEP research and publications/technical guidelines such as the LID Manual. 	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	6.2	This section mentions increased flooding, erosion and water damage to properties, extreme weather, etc., due to climate change and indicates that both mitigation and adaptation are required but there is no guidance on how to build adaptable communities and construct infrastructure using these two approaches. This document does not appear to change the design and acceptance criteria for stormwater management.	Mitigation and adaptation for climate change and what role SWM can play was reviewed through the development of TRCA's SWM Criteria Document and the Low Impact Development Design Guide. Markham staff participated in this process. These technical guideline documents are referred to throughout The Living City Policies.	N
Central Lake Ontario Conservation	6.2.1	It would appear more appropriate to have these policies renamed to objectives. All of these 'objectives' can be accomplished through proper watershed management, natural heritage protection, etc. Otherwise, it is unclear in which situations these guiding policies will be applied. For instance, "(b) To take a precautionary and adaptive approach to watershed management that considers the compounding effect of climate change on current stresses, and to endeavor to protect natural heritage, water resources and the communities within TRCA watersheds to make them as resilient as possible to climate change." Will this policy be used to review development proposals, if so, what grounds is there to argue that a development contravenes this guiding policy and as such should be refused in light of precautionary principle?	The chapter 6 policies are written in a manner that reflects TRCA's advocacy role in these areas. As well, a section has been added to the beginning of Chapters 6 and 7 indicating how the policies in each chapter will be used, in accordance with our various roles as described in Chapter 3, i.e., Chapters 6 and 7 are recommendations to approval authorities. The new wording emphasizes the municipal decision making role in the planning process.	N
Town of Ajax	6.2.1	Staff are of the view that an adaptive approach should be taken within existing urban areas, while strictly a precautionary approach should be taken to urban boundary expansions.	We agree, and the policy language in 6.2.1 is general enough to allow for this.	N
Cycle Toronto Ward Groups	6.2.1	(e) The impact of climate change on the transportation and recreational habits of Toronto-area residents will be significant. As average summer temperatures rise, and the incidence of skin cancer increases, many people will seek out cooler, shaded trails in the TRCA system – especially those that run near bodies of water. It is good to see the TRCA preparing now for the changes that global warming will be producing.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Don Watershed Regeneration Council	6.2.1	(b) not only protect communities but design new developments to make them as resilient as possible. (c) promote mitigation and adaptation also in development approvals . Use the "worst case" scenario for modelling as an objective to strive for in programs and approvals.	We agree, however, policies 6.2.1 b) and d) already address these points.	N
Etobicoke-Mimico Watersheds Council	6.2.1	(e) Should we include public education and outreach initiatives?	Section 6.10 contains policies for education and outreach.	N
City of Markham	6.2.1	The wording in the policy should include the TRCA working with the affected municipalities and stakeholders to achieve these objectives since it is the municipalities that usually implement the required work (restoration, remediation, etc.).	The policies already contain this type of wording.	N
City of Markham	6.2.1	(b) This section deals with an adaptive approach to watershed management. What exactly is this approach and what are some of the minimum requirements.	See Glossary for the definition of adaptive management.	N
Etobicoke-Mimico Watersheds Council	6.3.1	(d) Again I would include public education and outreach regarding current public sector policy on energy and conservation and on individual initiatives for energy conservation.	Section 6.10 contains policies for education and outreach.	N
City of Markham	6.4	These policies deal with energy and transportation and encourage the reduction of transportation energy consumption and green house gas through land use and development patterns. We support these (intensification and mixed-use) policies which is consistent with the Markham Transportation Strategic Plan (MTSP) direction and the OP policies. Compact, mixed-used development encourages other modes of Transportation because the length and number of vehicular trips are reduced.	Comment noted.	N

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Town of Richmond Hill	6.4	<p>This section lists the use of green vehicles, auto-sharing, carpooling, HOV lanes, and time-of-use road pricing as sustainable transportation programs. This section also talks about the work of Metrolinx and Smart Commute. All of these programs are geared toward the automobile. Other sustainable and active modes such as the use of public transportation, cycling and walking should be mentioned and considered. Additionally, this section could be broadened to speak to things that can be done in the built environment to promote active transportation or to make active transportation more attractive, desirable and comfortable (e.g. providing pedestrian amenities and street furniture along active transportation paths as a means of enhancing the system and encouraging destination-driven use of trails, providing bike parking and showers as sustainable transportation initiatives, advancing the objectives of various municipal/regional Pedestrian and Cycling or Trail Master Plans).</p>	<p>Active modes of transportation are already mentioned in Section 6.4 in the 1st, 2nd, and 6th paragraphs. However, some of the text in Section 6.4 has been modified to incorporate your point about what can be done to the built environment to encourage active transportation.</p>	Y

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York Region (Long Range Planning, Public Health, ES)	6.4	<ul style="list-style-type: none"> • Recognize links to health in section 6.4 from an air quality, climate change, physical activity, walkability perspective and safety perspective. • Recommend listing the sustainable transportation choices using the hierarchy of transportation i.e. walking, cycling, public transit, private vehicles (electric, hybrid). • Both the preamble text and the policies speak to integrating TRCA trail systems into their active transportation plans. Trails within natural systems should include a hierarchy of trail types from narrow footpaths to more substantial multi-purpose trails. Trails designed for active transportation generally require substantially more engineering (surface treatment, width, slope, curvature etc.) than other, more recreational trails. Policy 6.4.1.c should be revised to encourage "municipalities to explore opportunities for integrating appropriate TRCA trails into their active transportation plans". • Would also encourage the TRCA to consider a policy that speaks to naturalization of existing active transportation routes within the urban environment a policy to address transitioning active transportation routes from urban - to naturalized - to natural heritage trails. This would further promote integration of active transportation routes with TRCA trails. 	<ul style="list-style-type: none"> • The wording in policy 6.4.1 c) , i.e., "to explore opportunities for integrating..." provides flexibility in order to avoid inappropriate trail types in sensitive areas. • The detailed design information for trails that you have commented on is covered under the policies in the Recreational Use Section 7.4.5, and in particular, policy 7.4.5.1 h). TRCA is also currently drafting a Trail Strategy which will cover these details; we will pass your comments along to staff who are developing the Strategy. 	N
Town of Ajax	6.4	The TRCA should further articulate this position as it relates to a stated preference of intensification over continued urban boundary expansions.	Growth by urban expansion or intensification is driven by provincial policy and municipal implementation.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Cycle Toronto Ward Groups	6.4	Supports: <ul style="list-style-type: none"> ● Recognition of multiple uses of trails especially for transportation to work, transit, school, shopping, etc.; ● Recognition of the role of trails in multimodal transportation network, including connections to transit; ● Greater connectivity between the trail and street networks increases the usability of both, and provides greater safety for cyclists; ● More cohesive planning and public engagement from TRCA and municipal partners, towards the goal of increasing the choice of transportation modes. 	Comment noted.	

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Cycle Toronto Ward Groups	6.4	<p>1. Involve cyclists as a key stakeholder group in the development of the LCPs, as well as implementation of various recommendations.</p> <p>2. Environmental and sustainability benefits of cycling: Recognize the significant impact that improved cycling infrastructure, including on trails, will have on the long-term sustainability and resilience of our communities. Increasing bike commuter traffic on trails will reduce motor vehicle usage in the city, with a corresponding decrease in carbon emissions.</p> <p>3. Trail Master Plan: Develop a TRCA trail management plan, elaborating on the Living City Policies, specifically focusing on trail infrastructure, management and policies.</p> <p>4. Cyclists' status: Identify the trails where cycling is a Preferred Activity. On many trails, cyclists are by far the most numerous users. The interests of cyclists should not be deemed secondary to plans for environmental naturalization. Justification should be given for any trails not to include cycling as a preferred activity.</p> <p>5. Linear connectivity: trails should be as linear as possible. Connections in the network should be seamless in order to create viable, long distance trail routes</p> <p>6. Bike network: trails should be properly integrated within the on street network of bicycle facilities; where connections are not seamless, deficiencies should be rectified by adding appropriate infrastructure.</p>	<p>This external consultation process on The LCP is open to all stakeholders.</p> <p>Policies on Sustainable Transportation capture the importance of active transportation.</p>	N

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Cycle Toronto Ward Groups	6.4	<p>13. Lighting: trails should be well-lit at night along their entire length. At the very least, priority areas should be lit, such as dangerous underpasses and dark ravines. Where capital limitations preclude the installation of full lighting, wiring and viaducts should be installed along the trail for future light installation. Gaps in lighting should be avoided where possible. Lighting should be angled downwards towards the trail, reducing unnecessary light spill.</p> <p>14. Ramps instead of staircases with bike gutters: ramps provide far better, more inclusive and safer access than bike gutters on stairs.</p> <p>15. Wayfinding: signage should direct cyclists from all nearby cycling routes to the trail network, and inform cyclists on the trail of important connections as well as trail etiquette guidelines, and website address(es). To reduce conflict between users, signs along the trail should direct "slower traffic keep right". A dashed painted line should indicate the primary trail; if painted along the centre of the trail it would also separate the directions of trail traffic. Signs should be reflective to be visible in the evening.</p> <p>16. Blind corners: clear sight lines should be maintained along the trail, especially at bridges and underpasses. Sharp crests and curves should be avoided. Installation of mirrors is beneficial in spots where visibility cannot be improved by other means.</p> <p>17. BIXI: BIXI stations should be established at key locations along the trail network, especially at transit nodes and popular destinations.</p>	Level of detail outside the scope of policy document. Comments will be passed along to TRCA Conservation Lands staff responsible for trails on TRCA-owned lands, and who work in partnership with municipalities and user groups in their trail design, planning, implementation and management; also, TRCA Trail Strategy currently being developed by Conservation Lands staff will also look to incorporate your comments where possible.	N
Town of Ajax	6.4.1	A policy should be incorporated that indicates that the TRCA will not support infrastructure or expansions which result in irreparable harm or impact to Natural Systems.	The policies Section 7.4 address this issue and in particular, policies 7.4.4.1.2 a) to c).	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Cycle Toronto Ward Groups	6.4.1	(a), (b), (c) Cycling is a key element of sustainable transportation. The TRCA can help municipalities in the development of their own active transportation plans, and through the trail network it can develop and strengthen local cycling plans. Furthermore, the TRCA's trail network can function as a bridge between municipalities, combining into a true regional active transportation plan.	Comment noted.	N
Cycle Toronto Ward Groups	6.4.1	Complete Streets: Designing streets to be safe and accessible for all users, especially vulnerable pedestrians, cyclists, seniors and children, contributes greatly to providing a functional, sustainable active transportation network.	Comment noted.	N
Don Watershed Regeneration Council	6.4.1	Safety in designing bicycle routes (separation from traffic) and pedestrian amenities should be emphasized.	Comment noted; this is a municipal responsibility.	N
Etobicoke-Mimico Watersheds Council	6.4.1	Is Share the Road Cycling Coalition a TRCA partner? If not it should be.	Comment noted. Comment has been passed along to TRCA staff leading partnership projects in this area.	N
City of Vaughan	6.4.1	Consider changing policies that read "To encourage municipalities..." to read "To support municipalities...". For example, municipalities are developing policies for sustainable transportation, such that policy 6.4.1(b) can identify TRCA's potential role in supporting this effort, rather than simply encouraging municipalities. Similarly, 6.6.1 (c) could be revised such that TRCA recommends policies for consideration by municipalities with a goal to encourage and support the provision of agricultural uses within urban boundaries.	Agreed - wording has been changed from encourage to support for 6.4 Transportation and for 6.6 Near-Urban Agriculture.	Y
Etobicoke-Mimico Watersheds Council	6.5	The National Building Code was updated in 2012. It should reference the latest updates.	A sentence has been added to reference the relevant updates from 2012.	Y

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Town of Richmond Hill	6.5	This section could be broadened to speak to additional items that could go a long way in helping to monitor green building performance on a go-forward basis (e.g. building energy or water commissioning, individual unit metering of water and energy in multi-res. buildings - which to date is not required by the OBC, providing organics disposal areas in multi-res buildings). We'd also suggest water conservation/re-use be weaved into this section as a key theme in terms of future OBC amendments (e.g. greywater re-use in the building/for irrigation on the site, promotion of water conserving fixtures).	This information is too detailed for the scope of the section and is already referred to in the section in a general way. Also, the sidebar in Section 6.5 refers to programs and sources with links that contain this type of information.	N
Town of Whitchurch-Stouffville	6.5	The full extent of the initiative is unclear in the wording of the proposed policy. Extensive resource expenditure in attempting to influence the nature and characteristics of built form is questioned as it strays from the core mandate of conservation authorities. If resources are available to embark upon this type of initiative, they should be diverted to other aspects of the core mandate of the authority in providing for natural heritage and floodplain management.	Comment noted. It is a TRCA board-approved direction to advocate for green buildings in cooperation with funding partners.	N
Town of Ajax	6.5.1	A policy should be added that indicates that the TRCA will provide formal public recognition of Green Buildings and beneficial ecological design practices through an awards program. This program would include the following: a) development and land conservation award; b) green infrastructure award; c) stewardship award; d) Low Impact Development award.	TRCA has an annual recognition of these types of projects: The Living City Awards are presented every November at The Living City Environmental Dinner to organizations who exemplify TRCA's vision for The Living City, where human settlement can flourish forever as part of nature's beauty and diversity. There are three awards that represent each of The Living City objectives for healthy rivers and shorelines, regional biodiversity and sustainable communities. As well, the Charles Sauriol Environmental Leadership Award is presented to an individual who exemplifies TRCA's vision for The Living City, who practices sustainable methods in their everyday life, and who influences the community around them.	N

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Don Watershed Regeneration Council	6.5.1	To <u>promote</u> the use of green buildings <u>etc.</u>	The word "promote" has been added to the goal for 6.5.1.	Y
City of Vaughan	6.5.1	Green building policies could also refer to green buildings as part of sustainable neighbourhoods so that it is not just the site or building scale that is of importance.	This is stated in the goal for 6.5.1.	N
Town of Caledon	6.6	This section appears to address the idea of sustainable communities through the benefits of introducing or enhancing limited agriculture activity in the urban setting. The inclusion of such a section would be well balanced by also exploring urban rural issues from the opposite end of the spectrum, namely, managing the impacts of Near-Agriculture Urbanism, i.e. urban growth on natural heritage, natural hazard and or community sustainability in the more rural areas of the TRCA jurisdiction.	Chapter 7 deals with protecting and managing for impacts to areas of natural heritage and natural hazards.	N
Etobicoke-Mimico Watersheds Council	6.6	Can we get a community farms project going in Etobicoke-Mimico watershed? What about a agri-land reserve program for Caledon, Brampton and Halton Hills?	This comment has been passed along to TRCA staff who implement these programs.	N
City of Vaughan	6.6	The note regarding "beneficial management practices" of near-urban agriculture on TRCA lands could be further explained with potential outcomes (sensitive to surrounding biodiversity, ensuring soil enhancements over time, etc.)	Sidebar on FarmStart addresses this comment.	N
Waterfront Toronto	6.6	Waterfront Toronto recognizes the importance of local food production and combined with innovation in green roof technologies is interested in how urban agriculture opportunities can grow. We are currently exploring opportunities for demonstration projects and other ways to implement this important element of sustainable community development.	Comment noted.	N

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York Region (Long Range Planning, Public Health, ES)	6.6	Include "fewer local air pollutants" in benefits associated with minimal transportation related to urban gardening and nearby local agriculture.	1st paragraph, 3rd sentence captures this point.	N
City of Vaughan	6.6.1	(c) could be revised such that TRCA recommends policies for consideration by municipalities with a goal to encourage and support the provision of agricultural uses within urban boundaries.	Agreed - wording has been changed from encourage to support for 6.4 Transportation and for 6.6 Near-Urban Agriculture.	Y
Town of Ajax	6.6.1	A policy should be added indicating that the TRCA supports urban agriculture on un-used or under-utilized sites.	Addressed through policy 6.6.1 c)	N
City of Markham	6.7	These policies deal with Green Infrastructure and Ecological Design. While we see the benefits of these initiatives/policies, it is not clear how these initiatives are to be mandated and regulated.	This was discussed at the consultation sessions, i.e., these are advocacy policies, in contrast to chapter 7 (commenting role) and chapter 8 (regulatory role). Also, wording has been added to the Chapter 6 introduction (6.1) to further describe how the policies will be used.	Y
Ministry of Municipal Affairs and Housing	6.7	<ul style="list-style-type: none"> • Clarify natural system not for SWM disposal. • Add facts on trees and oxygen; water cleaning/saving from green roofs. etc. • Add in human health. 	TRCA's Stormwater Management and Low Impact Development Guides address the appropriate use of green infrastructure for SWM as it relates to the Natural System. The points about human health benefits are already made in sections 6.5 (Green Buildings) and 6.7 (Green Infrastructure - also see diagram on green infrastructure).	N
Town of Richmond Hill	6.7	This section could be broadened to speak to how the streetscape could be viewed as a connected piece of green infrastructure (e.g. references to a more concerted effort being taken as part of future EA/ infrastructure projects to integrate some of these features into the built environment). There are examples of where this is being done in York Region (e.g. Highway 7 rapidway) and other Regions/Cities in the GTA (e.g. various portions of Toronto's waterfront) and it would be helpful if this type of approach became the norm, rather than the exception.	Agreed - green streetscapes and roadways wording has been added to figure and preamble in section 6.7.	Y

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City of Vaughan	6.7	Green infrastructure in particular, but other policy areas in Section 6, could benefit from description in municipal engineering design criteria or alternative engineering standards.	Agreed - wording added to policy 6.7.1 c) about municipal standards and in green building policy c) too.	Y
Town of Ajax	6.7.1	There should be a role for TRCA in urban forestry enhancement boulevard trees etc.).	Comment noted.	N
City of Brampton	6.7.1	(b) Revise to indicate that an expanded urban forest will benefit the natural system and neighbourhoods/communities, as opposed to just residents.	Wording has been revised to "neighbourhoods and the Natural System."	Y
Etobicoke-Mimico Watersheds Council	6.7.1	What about green roof by-laws?	Yes, this is a municipal tool for implementation of green infrastructure that TRCA supports.	N
Peel Region	6.7.1	(b) Consideration should be given as to whether the benefits that the expanded urban forest trees contribute would be solely to the residents or rather should it not be to the neighbourhoods/ communities.	Wording has been revised to "neighbourhoods and the Natural System."	Y
York Region (Long Range Planning, Public Health, ES)	6.7.1	(b) Protecting the urban forest in its current configuration is both problematic and not always the best solution. Rather, "planning for the protection, enhancement and expansion of the urban forest..." provides the flexibility to ensure that the extent and nature of the urban forest is appropriate for the planned context.	Policy has been amended based on similar feedback.	Y
Don Watershed Regeneration Council	6.7.1	To <u>promote</u> the use of green infrastructure etc.	Wording has been revised to incorporate the word promote.	Y

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Cycle Toronto Ward Groups	6.8	Yes, integrating active transportation through natural environments on trails, rather than segregating natural environments as restricted zones, increases the appreciation of trail users for the natural spaces and increases the likelihood of success of sustainable stewardship. Urban parkland should emphasize human interfaces – in contrast to remote national parks, most of which prioritize the preservation of nature.	Comment noted.	N
Etobicoke-Mimico Watersheds Council	6.8	What would it take to get a revitalization project going for Etobicoke Creek in downtown Brampton to replace the current viaduct?	There is a "Downtown Etobicoke Creek Revitalization Study" currently underway. This study is comprised of two feasibility studies - Flood Mitigation and Urban Design/Land use, and is managed by a joint study team of City of Brampton and TRCA staff.	N
City of Vaughan	6.8	We welcome this section. Recognizing that this does not have a strong policy foundation in existing provincial documents, this is nevertheless an opportunity in the introductory text of Section 6.8 to refer to ecological design goals to move beyond simply mitigating the impacts of development to designing development projects such that they can regenerate elements of the natural system and ecosystem services.	Comment noted.	N
York Region (Long Range Planning, Public Health, ES)	6.8	The following sentence is included at the end of the first paragraph: "This is in contrast to the tradition view that they are 'take always' from the "net developable area". While I understand the intent of the sentence and fully support the message of the section, I recommend that the last sentence be removed as it is not necessary and appears to conflict with policy 2.2.7.3 of the Growth Plan. A number of municipalities, for the purpose of implementing policy 2.2.7.3 of the Growth Plan, define developable area to exclude eligible natural features and areas.	Sentence has been deleted.	Y

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City of Markham	6.8	These policies deal with Green Infrastructure and Ecological Design. While we see the benefits of these initiatives/policies, it is not clear how these initiatives are to be mandated and regulated.	Discussed at the consultation sessions that these are advocacy policies, in contrast to chapter 7 (commenting role) and chapter 8 (regulatory role). Also, wording has been added to the Chapter 6 introduction (6.1) to further describe how the policies will be used.	Y
Don Watershed Regeneration Council	6.8.1	Need for incentives to achieve ecological design?	The Living City Awards at TRCA's Annual Environmental Dinner is a way of recognizing good design. It is also captured in a general way through policies 6.8.1 a) and b).	N
City of Markham	6.8.1	(b) This policy only references "ecological design". We feel there is still a need and place for "engineering design" and perhaps this should also be referenced.	Reference to municipal standards has been added to chapter 6 policies where appropriate.	Y
York Region (Long Range Planning, Public Health, ES)	6.9	Policies in this section (except (a)) refer to the non-italicized term cultural heritage. Would recommend defining cultural heritage to include – built heritage resources, landscapes and archaeological resources.	The policies in 6.9.1 have been modified to better define cultural heritage <i>resources</i> .	Y

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City of Markham	6.9	This section deals with cultural heritage. Under the description of cultural heritage landscapes we suggest the examples include heritage conservation districts since these are some of the most major cultural heritage landscapes. What does the term "unique riverine association" mean? It would be helpful to provide clarification on whether the designation policies of Part IV and Part V of the Ontario Heritage Act apply to TRCA? Are they a creature of the province and therefore not subject to municipal/local authority? Or are they subject to Part 111.1 — Standards and Guidelines for Provincial Heritage Properties, the same as the province? This document does not speak at all to whether TRCA is actually subject to the provisions of the OHA. In the introduction, reference is made primarily to addressing cultural heritage resources at time of development. It is also desirable for the Maintenance of existing resources where development is not occurring (Rouge Park, Bob Hunter, TRCA protected lands). How does TRCA prioritize built heritage sites for preservation, continued use and funding of maintenance and restoration? Do they evaluate and rate their resources, or do they rely on the municipality to do that?	The term unique riverine association is referring to the fact that a significant portion of TRCA-owned lands is adjacent to rivers; this is often where archaeological resources are found. Much of TRCA-owned lands contain various built resources of major cultural heritage value and are often characterized by cultural heritage landscapes associated with these resources. The policies guide how we value these resources. For our lands, we are subject to all provincial standards under the OHA for cultural heritage resources. However, as a resource manager at the regional, watershed level, we promote the protection of cultural heritage resources and landscape value on all public lands. We work with our municipal partners to protect those resources where appropriate.	N
City of Brampton	6.9.1	This section should refer to cultural heritage "resources" since that is what is being described, and these policies should focus on TRCA owned lands only. Further, TRCA should recognize that all confirmed heritage designated resources on their lands will be listed on municipal registries.	These are advocacy policies promoting cultural heritage as an important component of sustainable communities, not exclusive to TRCA lands. We promote cultural heritage in general as reflected in policies a) through c), as well as on our own lands through policies d) to f). TRCA does recognize that heritage designated resources will be listed with the municipality.	N
City of Markham	6.9.1	(a) This policy should be more direct. Rather than "to encourage the protection and enjoyment..." we suggest it should be "To protect and conserve cultural heritage resources in TRCA ownership and on TRCA managed lands".	We promote cultural heritage in general as reflected in policies a) through c), as well as on our own land through policies d) to f).	N

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Peel Region	6.9.1	(b) Reference is made to the TRCA working with municipal partners and stakeholders to update planning documents and implement community projects supporting opportunities for the recognition, preservation and celebration of cultural heritage. If these are not related to TRCA owned lands, it is debatable how much TRCA should be involved in the updating of planning documents given existing provincial and municipal responsibilities in that area.	The policy has been amended to emphasize TRCA's supporting role.	Y
Peel Federation of Agriculture	6.10.1	The PFA objects to the TRCA's adoption of the protection/prevent policy strategy and demands a return to a partner approach where rural landowners and the TRCA work towards mutually defined conservation agendas.	We agree that the agricultural community is a key partner in achieving watershed health. A policy regarding agricultural stewardship has been added to section 6.10.1.	Y
Town of Ajax	6.10.1	A policy or practice should be developed whereby TRCA would include a requirement for developers/builders to distribute educational materials for areas abutting Natural Systems as a condition of draft plan approval.	This is what 6.10.1 d) is intended for. It is also part of current practice.	N
City of Toronto (Planning 2)	6.10.1	(a) The City fully supports this policy, and suggests that TRCA take a leading role. This suggestion is made because of the inherent efficacy that planning, promoting, and delivering watershed-based stewardship and sustainability from the perspective of the entire watershed has over programming delivered on an individual municipality basis.	Comment noted.	N
Building Industry and Land Development Association (BILD)	7	We acknowledge that a draft compensation protocol will be produced in September. BILD requests further notification for the release of this draft document.	Comment noted.	N

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Building Industry and Land Development Association (BILD)	7	We acknowledge that new stream crossing guidelines are currently being prepared by the Conservation Authority. We also request notification for the release of this draft document.	Commented noted.	N
City of Brampton	7	The LCP includes policies that recognize the need to address "cumulative impacts" and "adaptive management"; however, it is unclear through what process TRCA will inform and engage municipalities regarding the information/analysis/direction that is undertaken with respect to these issues, and how this will affect planning applications and municipal project planning, as well as the management and maintenance of municipal lands and infrastructure.	In section 7.4, Environmental Management Policies, there are several policies and objectives that describe the consideration of cumulative impacts and adaptive management, and which are largely a reflection of current practice. TRCA keeps municipalities and other project proponents informed and collaborates with them, through updates to watershed plans, hydrology updates and SWM criteria updates.	N
Environmental Defence	7	<p>Use the Greenbelt "Urban River Valley" (URV) designation to support the LCP policies 7.2.1(c) & (d), and 7.2.4(g).</p> <p>To support the proposed policy that "valley and stream corridors be protected as a key component of the natural system, in recognition of their ecological, social, and cultural landscape values", TRCA should use its influence to apply the Greenbelt URV designation to watercourses within its jurisdiction. This designation would prevent the sale for development of public land currently held by the TRCA or municipalities for development and raise public awareness of the value of our urban rivers and the services they provide. It would also support proposed policies 7.2.1(c) and (d), pertaining to TRCA support for the Greenbelt lands within its jurisdiction. To augment the protective value of the designation, and promote greater public awareness of the environmentally protective features of the Greenbelt, voluntary programs for private landowners should also be initiated.</p>	The URV designation process under the Greenbelt Plan must be municipally-led, however, TRCA has actively participated with several municipalities in pursuing these designations.	N

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Ministry of Municipal Affairs and Housing	7	Specify examples of applications under Planning Act (i.e., golf course, aggregate, plan of subdivision).	Section 7.5 contains policies for the different types of applications reviewed under the Planning and EA acts.	N
Ministry of Municipal Affairs and Housing	7	Sustainability of functions needs to be stronger.	Revisions have been made throughout the document to strengthen this point.	Y
Ministry of the Environment	7	<ul style="list-style-type: none"> • Overall, Section 7 provides a comprehensive overview of environmental planning policies and the roles and responsibilities already undertaken by the TRCA. The section also seems to outline new and enhanced TRCA roles and responsibilities in environmental protection. Consideration could be provided to highlighting the existing roles relative to the new roles in order to clarify any changes. • Section 7 sometimes highlights the goal of the policy area, which was deemed to be very helpful. It is recommended that goals be articulated for all policy areas in this section. • Consideration could be given to providing a general overview of some of the provincial legislation/ policy framework that also applies, including the CWA and Source Protections Plans, Climate Ready, MNR's Natural Heritage Manual, etc. 	<p>The policies in section 7 largely reflect current practice, as outlined in Chapter 3 discussion of CA roles and responsibilities. This was presented and discussed at many of our consultation sessions with stakeholders.</p> <ul style="list-style-type: none"> • The beginning of every major policy sub-section in Chapter 7 contains a goal. • Section 3 outlines the legislative foundation for all of the policy areas in the document. A note has been added to table 3.2 to capture technical guides such the the Natural Heritage Reference Manual and the Natural Hazard Technical Guides. They are also captured through the document's reference to Provincial Standards (defined in the glossary). 	Y

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City of Pickering	7	<p>City staff has found that some past TRCA comments on planning applications have not clearly identified which parts of comments are directive, advocacy, or advisory. It is recognized that the sites subject to some planning applications include both features that fall under TRCA’s regulatory role (wetlands, valleys of watercourses etc.), and the advisory role (natural heritage and hydrologic features governed by Planning Act and PPS), in addition to advocacy comments. It is often difficult for the City to differentiate which comments relate to the portions of sites that fall under TRCA’s directive role or its advisory role. It is requested that future comments be more carefully qualified as to their regulatory (directive), advisory (plan review/ recommendation) or advocacy authority.</p>	<p>Comment noted. Staff will work to address this issue in future correspondence, as discussed at consultation session.</p>	<p>N</p>

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Toronto (Planning)	7	<p>The VSCMP is well understood by municipalities and is presented in an integrated format that compliments the development review process. Policies that apply to different situations/project types are grouped together. The draft LCP is presented in a format that is intended to reflect and clarify TRCA's role in the development and approval process. Policies that apply under the Planning Act and the Environmental Assessment Act (chapter 7) are presented separately from policies that apply under TRCA's regulatory authority (chapter 8). While both approaches have advantages, the approach used in the draft LCP appears to result in duplication and overlap between chapters 7 and 8 and creates the potential for inconsistencies. It would be helpful to have the LCP policies organized in a way that is most accessible to the intended audience and avoids duplication to the extent possible. For example:</p> <ul style="list-style-type: none"> • Policies for natural hazard management and infrastructure are provided in both chapters 7 and 8. In some cases, the policies in the two chapters are the same. For example, compare policy 7.4.4.1 (i) and policy 8.9.4. In other cases the policies are similar but slightly different. For example, compare policy 7.4.3.2.2 (b) and 8.5.2.2 also compare policy 7.4.3.3.1 (e) and 8.6.1. • Cross references between policies in chapters 7 to policies in chapter 8 and vice versa creates a circular situation which may be challenging to interpret. For example, see policy 7.4.3.2.2 (c). 	<p>The LCP's format is consistent with provincial direction to conservation authorities (CAs) to indicate to all stakeholders the differing roles and responsibilities of CAs in the planning and development process, through a set of publicly consulted-on policies that are approved by the Authority Board, (refer to "Policies and Procedures for Conservation Authority Plan Review and Permitting Activities").</p> <p>Some duplication between the planning and regulation chapters occurs, however, this is to achieve consistency throughout the planning and development process - from CA recommendations for municipal or EA approval, to CA permit requirements at the detailed design stage. In addition, the activity-based policies section 7 may be reiterated in chapter 8 from the regulatory perspective to capture those permit applications that have no associated planning application and vice versa.</p> <p>Policies cited for comparison are different because they are for different natural hazard management approaches, e.g., one zone versus two zone and valley and stream corridors versus Lake Ontario Shoreline.</p>	N
City of Toronto (Planning)	7	<ul style="list-style-type: none"> • Does TRCA wish to review applications which are outside the regulated area but within the natural system? • How will TRCA apply policies that extend beyond the regulated area and, in some cases, beyond the natural heritage system identified in the City's Official Plan? 	<p>The LCP is largely reflective of TRCA's current plan review process as discussed at consultation sessions.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Toronto (Water)	7	One area that could be strengthened relates to tree protection. In the absence of Provincial tree protection, the TRCA may wish to consider providing municipalities with greater guidance, such as through a requirement to implement a standard of protection, or alternatively, implement a requirement to address tree protection via planning applications. This comment is made in the context of current municipal tree protection, which remains weak in the context of higher order statutes that govern development, such as the Planning Act and the Building Code Act.	The policies recommend that the Natural System (that captures valley and stream corridors, which may be forested and may capture tableland woodlots where they exist within potential natural cover) be protected from development. Further, the LCP contains a policy that advocates for the protection of the urban forest.	N
City of Vaughan	7	We recommend that each policy section include the legislation, regulation and/or key supporting document be referenced in the text, "It is the policy of TRCA:". This will assist by conveying an understanding of the strength of the policy in relation to municipal requirements and/or standards.	To include supporting references for each policy is not feasible given the number and complexity of references that might be relevant for each policy. Chapter 3 outlines the different roles of a CA under legislation. However, wording has been added to Chapter 7's introduction to reiterate how the policies will be used.	Y
City of Vaughan	7	What will be the process to amend the LCP document following the Ministerial approval of the Woodbridge SPA?	Appendix A will be updated to reflect any new provincially-approved SPA policies and boundaries.	N
Town of Whitchurch-Stouffville	7	It appears to be an evolving consensus of municipalities that going forward the TRCA should be making it abundantly clear under which capacity it is providing comments in a particular context - advisory or regulatory. This will assist in informing decision makers the context and weight that should be given to the comments.	Comment noted. Staff will work to address this issue in future correspondence.	N
York Region (Corporate/ Strategic/ Long Range Planning)	7	The LCP provides direction for the protection of Natural Systems and seek to implement a "target" system identified in TRCA's TNHS, 2007 which includes features that occur outside of valley and stream corridors. This policy section should recognize the relationship between the TRCAs objectives and the natural heritage systems identified and protected in regional and local official plans.	Revisions have been made throughout Chapter 7 to further emphasize the municipal role in defining Natural Heritage Systems.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Corporate/ Strategic/ Long Range Planning)	7	Request further clarification on the terms "cumulative" and "compensation". In particular, York Region is looking for guidance on how these policies would relate to/and or impact infrastructure projects that are conducted under a Municipal EA. It is our understanding that TRCA's Compensation Protocol remains under development and a draft will be released for stakeholder consultation shortly. York Region welcomes the opportunity to continue to provide input as the compensation strategy develops.	Comment noted. Issues such as this will be discussed through consultation on the draft TRCA Compensation Protocol.	N
York Region (Long Range Planning, Public Health, ES)	7	York Region supports The Living City Policies "systems approach" and integrated watershed planning for water management and natural heritage protection.	Comment noted.	N
York Region (Long Range Planning)	7	This policy section should recognize the relationship between the TRCA's objectives and the natural heritage systems identified and protected in regional and local official plans.	The preambles and the policies in this section have been modified to further emphasize this relationship.	Y
Town of Richmond Hill	7	The document does not contain any discussion or policies specifically related to the management of invasive species.	Policy 7.4.2.1 f) speaks to this.	N
City of Toronto (Planning 2)	7	The City recommends that, the next version of the LCP include a discussion in the preamble to the policies to explain how the policies will be applied in the context of different municipal OPs and how the policies will be applied in the context of different urban conditions. In some cases, the wording of policies may also need to be modified.	We have added a paragraph to Chapter 7 describing how the policies will be used. The other policy chapters (6 and 8) already contain explanations about their use.	Y
Town of Ajax	7.1	The policies for Environmental Planning should also include a broad based goal to improve the health and ecological well being of watersheds generally (p. 53).	The Goal in 7.1 has been modified to incorporate this point.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.1	This section should also recognize that municipal OPs are recognizing the connection/interrelationship of the natural and built environments, including the provision of ecosystem services and the need to conserve and manage for environmental sustainability.	The last paragraph in this section has been modified to address this comment.	Y
City of Brampton	7.1	Second paragraph: Should also recognize that TRCA's advice must also relate to municipal Official Plan policies which may further interpret the PPS policy direction and reflect regional and local contexts.	This point is captured in the wording "...and in accordance with our provincial and municipal memorandums of understanding and municipal service agreements..", which refer to municipal official plan policies.	N
Peel Region	7.1	Second paragraph of introduction - references that TRCA's comments typically relate to the PPS sections on natural heritage, natural hazards and water. This statement should be revised to also recognize that TRCA's advice relates to policy contained in municipal official plans which may further interpret the PPS policy direction and reflect regional and local contexts.	See response for Peel comment above.	N
York Region (Long Range Planning, Public Health, ES)	7.1	<ul style="list-style-type: none"> • It would be helpful to structure responses to development applications so there is a distinction made between mandate and advocacy comments (p. 53). • It would also be helpful to identify when comments are being provided under MOU agreements, these responses should be provided to the approval authority, proponent and agency being represented under the MOU (p. 53). • The difference in the definition of "development" in Chapter 7 (PPS definition of development) and that used in Chapter 8 (Conservation Authorities Act definition of development) should be highlighted earlier in Section 7.1. The current location (at the end of the section in an "additional information box") lends itself to being missed as a key piece to interpretation of both Chapter 7 and 8. This differentiation should also be noted at the beginning of section 8. 	<ul style="list-style-type: none"> • Staff will work to address this issue in future correspondence. • We have made the definition of development more prominent in both Section 7 and Section 8. 	Y

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Ministry of Municipal Affairs and Housing	Figure 7.2	GSC has better graphics of ORM.	We have checked the GSC and have found the current diagram to be the best for illustrating aquifers and aquitards in TRCA's jurisdiction.	N
Town of Ajax	7.2	The TRCA should recognize the inherent value of rural landscapes both within and outside of the Greenbelt as environmentally important by maintaining reduced urban heat island effects, agricultural functions, providing visual connections between natural systems and defining settlement areas. The TRCA should clearly recognize and protect headwater locations, both on and off the Oak Ridges Moraine from urbanization.	The preambles in Chapter 7 already describe many of these points. A discussion of headwater drainage features has been incorporated into 7.2.4 Watersheds.	N
City of Brampton	7.2	(d) Recommend that this policy clearly identify the protection of agricultural land outside the urban boundaries of its watersheds.	The policy intent is at a landscape level and is not intended to preclude directions from municipal OPs on agriculture outside of urban boundaries.	N
Etobicoke-Mimico Watersheds Council	7.2.1	Include mention of URV designation?	Reference to the URV designation has been added to section 7.2.1.	Y
Etobicoke-Mimico Watersheds Council	7.2.1	(a) What are the municipal responsibilities regarding acknowledgement and implementation of advice received from the TRCA?	Please refer to table 3.1 - comments should be considered.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.2.1	(a) This policy directs that TRCA provide advice to municipalities to achieve decisions that 'conform to the Greenbelt Plan and Oak Ridges Moraine Conservation Plan'. It is the responsibility of the municipality to ensure Greenbelt and ORM conformity. Currently, TRCA comments to Markham do not include Greenbelt Plan interpretation. This policy should be clarified. We note, consistent with Table 3.2 in the LCP that municipalities are responsible for the interpretation of Greenbelt policy matter and technical clearances, where necessary, are provided by the TRCA.	Policy 7.2.1 a) states that TRCA is providing advice, not approval, with respect to the Greenbelt Plan and the ORM Conservation Plan. Staff are working on providing greater clarity on commenting roles in future correspondence, as discussed at consultation session.	N
City of Markham	7.2.1	(b) This policy directs that watershed plans be used in the review of development proposed in the Provincial Greenbelt. There appears to be a different standard being advocated for the use of watershed plans inside the Greenbelt. We are not clear why this is being proposed. Policy 7.2.4 e) seems to address the watershed plan reference.	Watershed plans were a requirement of the ORM Plan within the GB. This treatment does not exclusively apply to GB - indeed the same policy is in the watersheds section, 7.2.4 e).	N
City of Markham	7.2.1	(d) This policy references lands on and off the Greenbelt so perhaps it is better located in the general policies rather than the Greenbelt policies.	Agree. The "on or off the Greenbelt" statement has been deleted.	Y
Ministry of Natural Resources	7.2.1	Section 2.3 speaks to the Issues, Challenges and Opportunities and the Greenbelt Plan. Policy 7.2.1 refers to reviewing applications under the Planning Act in the context of the Greenbelt Plan. Is it the intent of the CA to align the regulatory approvals with the intent of the ORMCP/Greenbelt Plan (exclusive of a Planning Act application) for things other than setbacks (e.g., implementation of the Natural Heritage System Policies of Section 3.2.2 of the Greenbelt Plan)? Perhaps this was stated in the document and I simply missed it.	The Greenbelt Plan is not prescribed for <i>Conservation Authorities Act</i> applications but TRCA aligns its permitting decisions with the Plan on a best efforts basis and within the purview of its regulation. This reflects current practice.	N

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City of Brampton	7.2.2	(a) Similar to (b), please clarify what is meant by the "use of natural green elements" since the definition indicates that these are traditional elements of the natural heritage system that should be protected and restored. Is this policy indicating the creation of natural green elements within the development lands? Further, please clarify how the maximization of ecosystem services will be assessed.	Natural green elements is a defined term in the glossary. An example of the use of/the protection of natural green elements would be to retain a hedgerow or a line of trees within a development. The intent of the policy is to look for these opportunities to improve the level of ecosystem services provided by the urban landscape. The policy does not call for an assessment. The wording of the policy has been modified to be clearer.	Y
Town of Ajax	7.2.2	The TRCA should also oppose premature or unsubstantiated urban boundary expansions within headwater locations.	Policies 7.2.4 d), 7.5.2.2 b) address this issue.	N
Central Lake Ontario Conservation	7.2.2	(a) and (b) It is unclear whether these policies apply to every development and redevelopment projects or is this meant to mean that where there is opportunity, natural or green elements will be incorporated. Consider changing the language to make these policies more specific.	The intent of these policies is to look for opportunities to improve the level of ecosystem services provided by the urban landscape and the Natural System. The wording of policy a) has been modified to be clearer on this.	Y
City of Markham	7.2.2	(a) and (b) These policies address restoration in the Urban Landscape. Restoration cannot be fully funded through "redevelopment "by landowners. In most situations, once the ecosystem services and natural system are destroyed or degraded through previous development, they cannot be restored. This policy should be softer and include "where appropriate and feasible".	The intent of these policies is to look for opportunities to improve the level of ecosystem services provided by the urban landscape and the Natural System. The wording of policy a) has been modified to be clearer on this. In terms of policy "softness", the policy says, "to recommend."	Y
Peel Region	7.2.2	(a) and (b) The intended policies seek to maximize ecosystem services in the urban landscape and improve the level of ecosystem services provided by the Natural system. There is some concern as to how the maximization will be assessed and where will the improvement to ecosystem services be assessed, i.e. whether on-site, off-site or both.	The intent of these policies is to look for opportunities to improve the level of ecosystem services provided by the urban landscape and the Natural System. The wording of policy a) has been modified to be clearer on this. The policies do not call for an assessment.	Y

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York Region (Long Range Planning, Public Health, ES)	7.2.2	Suggest including additional ecosystem services (in addition to curbing urban heat island and reducing run-off).	A list of ecosystem services is included in the introduction to Section 7 in sidebar.	N
Ministry of the Environment	7.2.3	The goals, objectives and policies of The Living City document reflect a broad spectrum of the mandate of the CA, or the TRCA in particular. However, greater emphasis could potentially be placed on where the CA and the TRCA fits within the broader framework of protection of the Great Lakes. Ontario's Great Lakes Protection Strategy outlines a broad range of programs and initiatives for the protection of the Great Lakes. The TRCA, and CAs in general, are important partners in the implementation of these programs and initiatives. This role is particularly important in the urbanized watersheds for which the TRCA has jurisdiction, especially for issues related to nutrients, the protection of the nearshore and coastal areas, maintaining ecological integrity, ensuring that Lake Ontario is maintained as a source of quality drinking water, and many others.	Acknowledged and agreed - however, TRCA restoration work to maintain and enhance "healthy rivers and shorelines" (aligned with Great Lakes Strategy), is done by other divisions within TRCA. Section 7.2.3 describes some of TRCA's role in this regard within the context of the planning and development process. Provincial Great Lakes restoration programs for Lake Ontario are implemented by TRCA Restoration Services staff on TRCA-owned lands or on partner-owned lands. They also, from time to time, can serve as a pool of possible projects to be chosen from for proponents required by the planning or permitting approvals processes to carry out a restoration project. But in order to further highlight Great Lakes protection and TRCA's role in it, a text box has been added on the topic, in section 7.2.3.	Y
Town of Ajax	7.2.3	A policy should be included to indicate that the TRCA will not support development or infrastructure that either degrades, continues to degrade, or contributes to the degradation of the water quality of Lake shoreline for any environmental, ecological, recreational or other public purpose.	Policy 7.2.3 b) includes water quality. The Regulation policies in chapter 8 also apply the test of pollution.	N
Cycle Toronto Ward Groups	7.2.3	(b) (i) While this chapter recognizes the role of the trail network through natural environments, nonetheless the language treats the trail network as primarily recreational. Active transportation use of trails should be included in the language around trails in this section, and all future planning of multiuse trails. Also applicable to language in 7.2.4.	Policy 6.4.1 c) in section 6 addresses this comment with regard to trails for active transportation.	N

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Peel Region	7.2.3	It is unclear whether any of the proposed policies dealing with the Lake Ontario Shoreline takes into consideration the recently approved policies of the Ontario's Great Lakes Strategy which is also not reflected in the Reference section of the Policy document.	The Shoreline policies and all of the policies in The LCP are aligned with the Great Lakes Strategy given that the Strategy states that "Healthy watersheds give us healthy Great Lakes."	N
Waterfront Toronto	7.2.3	Please note that Waterfront Toronto was one of the founding members of Aquatic Habitat Toronto (AHT) and continues to be a key stakeholder with the agencies such as TRCA, DFO, MNR, City of Toronto and Waterfront Toronto, with Environment Canada. Waterfront Toronto was also a stakeholder that was part of the creating of the Toronto Waterfront Aquatic Habitat Restoration Strategy, which was the program that led to the creation of the AHT group. The policies under Lake Ontario Shorelines are consistent with Waterfront Toronto's corporate objectives, particularly the policy that indicates to promote an integrated approach to revitalization of the waterfront that: (i) provides for increased public access, recreational opportunities and continuous trail system; (ii) preserves and enhances public views of the Lake and its shoreline features; (iii) improves or restores the quality of water, beaches, and terrestrial and aquatic natural habitat of the shoreline; (iv) connects and links waterfront habitats and amenities to valley and stream corridors.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	7.2.4	Additional guidance should be provided in the policies to indicate to either the Regions or the Province should explicitly recognize the importance of planning at the scale of the watershed. A policy should be incorporated indicating that headwaters are vital elements of the watershed which warrant special protection. There needs to be specific wording on this feature and tailored stormwater protection. Guidance should be provided regarding the content of watershed or subwatershed plans to guide future planning initiatives.	The preamble and policies for 7.2.4 have been modified to further emphasize the importance of watershed planning. In addition, policies for headwater drainage feature (HDFs) protection are 7.3.1.1 and 8.8.2. The latter refers to TRCA's Headwater Drainage Features Guidelines which provide guidance on evaluation, classification and management for the protection of HDFs' features and functions. The water balance for natural features criterion in the stormwater management policies (7.4.1.1.1) of the LCP also contributes to the protection of these features and their functions.	Y
City of Brampton	7.2.4	(a) The City would disagree that the watershed is the most meaningful scale for land use planning. The development of complete communities must be undertaken at the municipal scale in order to balance economic, social and cultural interests. Given the CA's mandate, we would recommend that this read "natural heritage system planning".	The policy states that the watershed is the most <i>environmentally</i> - meaningful scale. This is also consistent with section 2.2.1 a) of the PPS.	N
City of Brampton	7.2.4	(f) Please qualify who this policy is referring to.	Municipal and TRCA staff. The policy has been modified to make this more clear.	Y
Durham Region	7.2.4	Policy 7.2.4 d) and Policy 7.5.2.2 b) both recommend that watershed or sub-watershed plans should be completed or updated prior to approval of municipal urban area expansions.	Comment noted.	N
City of Markham	7.2.4	Markham supports planning large greenfield areas on a watershed basis.	Comment noted.	N
City of Markham	7.2.4	(g) This policy deals with the protection of valley and stream corridors and seems out of place in the watershed policies.	The rationale for this policy is provided in the preamble for 7.2.4.	N
Ministry of Municipal Affairs and Housing	7.2.4	(c) Be stronger in use of documents.	Policy wording reflects TRCA Board's direction.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Federation of Agriculture	7.2.4	The PFA objects to the wasteful production of watershed plans costing hundreds of thousands of dollars that have no added value to landowners of their communities. The PFA members, as property taxpayers, demand effective use of their monies.	Watershed plans are not a wasteful use of taxpayers' monies, but rather add value to the planning and development process. Watershed plans are required by legislation in some instances (Oak Ridges Moraine Conservation Act and ORMC Plan) and recommended to be undertaken in other provincial planning documents. Watershed Plans provide valuable baseline science-based environmental information that is often incorporated into municipal official plans and informs policies on how development can proceed while protecting environmental resources. Watershed plans assist municipalities with informing long range planning decisions relating to open space needs for new communities, and infrastructure maintenance and repair as well as preventative infrastructure remediation; this helps protect significant public investment in public property and infrastructure.	N
City of Markham	7.2.4	(d) This policy recommends that watershed plans be completed or updated prior to approval of municipal urban area expansions. Urban expansion areas are often identified first and watershed plans are more for mitigation rather than to identify the limits of the expansion. The reference to "prior to approval of municipal expansion" should be removed or reworded. This policy should "encourage" municipalities to complete or update watershed plans but not recommend. There is no specific provincial requirement that obligates the preparation of watershed plans.	The policy recommends or encourages, reflective of our role as a commenting agency in the planning process; it is not worded as a requirement.	N
York Region (Long Range Planning, Public Health, ES)	7.2.4	Support assessment of cumulative impacts through waterfront monitoring programs – aligns with our public health mandated beach monitoring program.	Comment noted.	N

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Peel Federation of Agriculture	7.2.4	c) The PFA objects to the notion of cumulative effects to be used in unspecified ways to restrict the enjoyment and use of lands or to demand costly studies and works based on vague hunches about "impacts".	Some of the objectives and policies for cumulative impacts are directed at TRCA to conduct monitoring to scientifically determine cumulative impacts from development and is reflective of current funding by municipalities to undertake this work. Monitoring results inform how future development can proceed while minimizing negative impacts. Other objectives and policies for cumulative impacts in the LCP are recommending that all stakeholders in the planning and development process consider the cumulative impact of development and infrastructure, consistent with an integrated watershed management approach. The definition of cumulative impacts has been modified to be more specific about this watershed-based perspective.	Y
City of Toronto (Planning 2)	7.3	In the City of Toronto, the ability to successfully protect the natural heritage system is weakened by development and site alteration such as re-grading, installation of retaining walls and accessory structures, and "minor" additions that are not captured under the Planning Act definition of "development". The natural heritage system can also be threatened by adjacent over-steep slopes, poorly placed fill, non-engineered retaining walls, for example. In reference to 7.3, the City suggests the following: <ul style="list-style-type: none"> •7.3.1(b) Strategies to prevent the above-listed disturbances and losses to the natural heritage system should be strengthened, including the ability to convey natural heritage lands to public ownership along with appropriate buffers and/or setbacks; •7.3.1(f) The specific technical reports should be appropriately referenced so they can be easily located; •7.3.1.3 Reference to "unstable soil or unstable bedrock" should include steep slopes along former shoreline features of Lake Iroquois; and •7.3.2(a) Buffers and/or setbacks should be included as part of the Natural System lands conveyed into public ownership. 	Dedication policies are in Section 7.3.2 and include buffers/ setbacks. The technical reports are referenced in the Planning and Development Procedural Manual. The Lake Iroquois Shoreline falls under erosion hazards covered in the Natural Hazard policies in 7.4.3.3; it is also mentioned in Section 7.2.1, the Provincial Greenbelt.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Vaughan	7.3	We prefer to see more discussion of the relation of the Natural System defined by TRCA to natural heritage systems implemented and designated by municipalities through official plan policies.	Some wording has been added to this section to further emphasize implementation by municipalities as approval authorities in the planning process.	y
Peel Federation of Agriculture	7.3.1	The PFA objects to the use of theoretical targets for forest and wetland cover to be achieved in rural areas.	Targets are based on modelling using the best available science on a watershed basis.	N
City of Brampton	7.3.1	<ul style="list-style-type: none"> • (d) Should consider providing a definition for "alteration" beyond what is permitted in the current zoning in the context of development. For example, would expansion of an existing recreational use such as a golf course be considered an alteration? • (e) (iii) Please clarify if you are referring to a municipal schedule for the NHS. If so, this policy should also reference OP policies, since schedules are only meant to be illustrative at a point in time, and are superseded by policies in terms of refinement and where conflicts may arise. Revise to indicate "Natural Heritage Systems policies in municipal official plans." • (g) Policy (a) indicates Natural Features and Areas, in combination with Water Resources and Natural Hazards to describe the Natural System, but this policy uses "natural heritage". Would it not be better to say "to establish systems mapping for the Natural System"? 	<ul style="list-style-type: none"> • The expansion of a golf course (as a major recreational use) is covered in the recreational use policies 7.4.5.1 (in policy e) in particular). • Policy 7.3.1 e) iii. has been modified accordingly. • Policy 7.3.1 g) has been modified accordingly. 	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Environmental Defence	7.3.1	<p>To support the policies outlined in the LCP 7.3.1 TRCA should refuse permitting on non-urbanized land in municipalities that have not completed natural system or prime agricultural area mapping exercises.</p> <p>Under section 4.2 the Growth Plan, municipalities and other planning authorities are encouraged to identify and plan for natural heritage features that enhance natural systems and maintain or improve farm related infrastructure in prime agricultural areas.</p> <p>TRCA should develop policies that draw a firm line on the conversion of non-urbanized land to urban uses within its jurisdiction in municipalities that have not completed the natural heritage system mapping and prime agricultural area planning. Municipalities are urbanizing land within TRCA jurisdiction before these assessments can be made and are permanently undermining proposed policies 7.2 (c) & (d), 7.2.2 (a) & (b); 7.2.4 (b), (c) & (d); and 7.3.1.</p>	<p>The policies in chapter 7 are for TRCA's role as a commenting agency to approval authorities under the <i>Planning Act</i> and the environmental assessment acts. The policies for TRCA's permitting role are in Chapter 8.</p> <p>TRCA is not the approval authority under the <i>Planning Act</i> and therefore cannot prevent municipalities from expanding their urban envelopes. However, policies in section's 7.2 and 7.5 recommend to municipalities that watershed plans be completed prior to their approval of urban boundary expansions.</p>	N

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King Township	7.3.1	<p>The Document identifies the natural system as including elements that are not currently subject to protection policies and/or evaluation processes, in accordance with King's planning documents, for example, woodlot features that are not identified as significant by the ORMCP. We pose the following for clarification and/or additional discussion:</p> <ul style="list-style-type: none"> • How the policies of the Document, and the evaluation of these natural elements will be incorporated into municipal evaluation and approvals processes? • What will be the trigger to evaluate such natural elements currently not subject to review? • Until such time as these additional natural system elements (beyond those that have been identified as significant under the applicable provincial plans) have been incorporated into municipal official plan and zoning documents, are these elements going to be subject to evaluation and review by TRCA only as a result of the subject lands undergoing a planning and/or permitting process for elements of the natural system that are currently subject to protection and evaluation (ex. KNHF)? • Planning staff is respectively cautious about the application of additional approvals processes etc. onto lands within the Township already subject to many additional reviews, in accordance with layers of legislation and policy. Planning staff would like to better understand the effects of these proposed policies on Township lands, particularly within settlement areas. 	<p>The LCP is largely reflective of TRCA's current plan review process where our review is triggered by circulation of planning applications by municipalities, which includes the process of staking and evaluating natural features and establishing the limits of development in consultation with the municipality.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.3.1	If policies are to be introduced to address the management of TRCA Natural System then this system should be identified through mapping. We note the potential conflict of providing policies for a Natural System that can be potentially different than a municipal natural heritage system identified in statutory Official Plans. We would prefer if the TRCA scoped these policies to support the statutory natural heritage systems designated in local Official Plans which TRCA participates in developing.	The policies in section 7.3.1 describe the process for defining the Natural System, which is done in cooperation with the proponent, and in consultation with the relevant municipality, and does not lend itself to the creation of a pre-determined jurisdiction(TRCA)-wide map. However, the preamble and policies in 7.3.1 and 7.3.1.4 have been modified to further emphasize the role of natural heritage policies in schedules in municipal official plans.	N
City of Markham	7.3.1	(a) This policy identifies what is included in the TRCA Natural System. The TRCA system is described differently than the City's Greenway System providing for potential conflict in the implementation of these systems. The City's Natural Heritage Network is defined in a more comprehensive manner and mapped.	The policies in section 7.3.1 describe the process for defining the Natural System, which is done in cooperation with the proponent, and in consultation with the relevant municipality, and does not lend itself to the creation of a pre-determined jurisdiction(TRCA)-wide map.	N
City of Markham	7.3.1	(b), (c), (d) These policies deal with land use and as a municipal function and appear to go beyond the "commenting" role of the TRCA. We suggest that the wording be clarified to align with municipal Official Plans. For example, we suggest policy wording, "That the TRCA recommend to municipalities that policies be included in Official Plans which identify that development and site alteration not be permitted in the Natural System except as provided for in the Sections 7 and 8 of the LCP and as provided for in Official Plans".	The preamble and policy wording in section 7.3.1 has been modified to more clearly acknowledge that municipalities are the approval authority for natural heritage systems planning.	Y
City of Markham	7.3.1	(e) This policy directs the determination of the Natural System in consultation with municipalities. This is confusing given that municipalities have already defined natural heritage systems in their Official Plans. The policy suggests an outer limit which would include municipal Official Plan's as a component suggesting; a larger natural system is potentially contemplated. Technical reports are subject to only TRCA standards and provincial standards but not municipal standards. There is a high potential for conflict with the City's Natural Heritage Network as it is defined differently.	The preamble and policy wording in section 7.3.1 has been modified to more clearly acknowledge that municipalities are the approval authority for natural heritage systems planning. Municipal standards has been added to policy f) regarding technical reports.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Ministry of Municipal Affairs and Housing	7.3.1	Add "Provincial Standards".	"Provincial Standards" has been added.	Y
Peel Region	7.3.1	In principle, the policies relating to the goal of protecting, restoring and enhancing the natural system within TRCA's jurisdiction are supported. Although the general scope and detail of the policy intent is supported, these policies principally set out a regulatory approach to the achievement of an enhanced system and do not differentiate between urban, rural and agricultural areas or provide a distinction for minor development and site alteration. While the approach is likely best suited to an urban or urbanizing context, it is not clear whether TRCA intends to recommend the policies as currently written for application to existing agricultural areas which typically have existing zoning and undergo little development or redevelopment.	The policies are largely a reflection of TRCA's current plan review practice where our review is triggered by circulation of planning applications by municipalities.	N
Peel Region	7.3.1	(e) Since the thrust of this policy is for plan input and review purposes, it is recommended that the order of the policy items i) to iii) be reversed so that the first reference is to municipal official plan policies and that item iii) be revised to "Natural Heritage Systems policies in municipal official plans".	Agreed. Policy 7.3.1 e) has been modified accordingly.	Y
Peel Federation of Agriculture	7.3.1	The PFA is concerned and objects to the broad prohibition of development and site alteration on extensive, undetermined swaths of rural lands, particularly without notice or compensation. The general intent of the "natural system", and other TRCA policies, is to nationalize large areas of lands without compensation based on vague references to climate change and loss of "biodiversity".	TRCA policies for environmental planning (Chapter 7) are consistent with the direction in the Provincial Policy Statement (PPS), to protect natural heritage and water resources for the long term and manage any impacts resulting from development and site alteration associated with a development application under the <i>Planning Act</i> .	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.3.1	<p>Although the General Policies for Plan Input and Review in section 7.5.2 clearly articulate TRCA’s advisory role in the plan review function, the policies proposed in section 7.3.1 lead to confusion about how TRCA will differentiate its directive recommendations from the advisory recommendations made under its plan review functions.</p> <p>The Planning Act requires municipalities to request comments from CAs on planning applications containing natural heritage features governed by the definitions and policies contained in the PPS. Municipalities must take such comments into account in arriving at decisions on planning applications and also must balance protection of natural heritage with the consideration of other provincial interests, plans, laws and regulations in arriving at decisions on planning applications. Except for the portions of sites that fall within TRCA’s regulatory role, municipal Councils have authority to make the decisions on planning applications.</p> <p>With the foregoing in mind, there are a number of areas of concern with respect to Policy 7.3.1:</p> <ul style="list-style-type: none"> • Inclusion in the broad definition of the Natural System of components that fall under TRCA’s regulatory role, some that fall under the advisory role (plan review function/PPS) and one not explicitly recognized by the Planning Act (potential natural cover). This makes it confusing to determine how TRCA will separate the directive from the advisory comments to municipalities. 	<p>The preamble and policy wording in section 7.3.1 has been modified to more clearly acknowledge that municipalities are the approval authority for natural heritage systems planning.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.3.1	<p>There are a number of areas of concern with respect to Policy 7.3.1:</p> <ul style="list-style-type: none"> • The meaning of “Natural Features and Areas” is unclear. It appears that the intended meaning is as set out on page 65. Since no differentiation is provided for “significant” features from features that are not significant, it appears that TRCA is proposing to apply the more restrictive policies for significant features contained in the PPS policies to features that are not “significant” in its comments to municipalities on both regulatory and advisory matters, an extension of current Provincial policy. 	<p>Some features that are not provincially significant may be still warrant inclusion in the Natural System. In these cases, TRCA, in its commenting role, would recommend to the approval authority that they be retained. This is consistent with current practice in TRCA plan review as discussed at the consultation session.</p>	N
City of Pickering	7.3.1	<p>There are a number of areas of concern with respect to Policy 7.3.1:</p> <ul style="list-style-type: none"> • Inclusion of Potential Natural Cover within the Natural System, in the absence of legislative authority in the Planning Act, also appears to be an extension of Provincial policy. Accordingly, potential natural cover should be removed from the definition of Natural System. See comments respecting Policy 7.3.1.4 for further reasoning. 	<p>The PPS definition of natural heritage systems includes "lands with the potential to be restored." Further, these lands could constitute hazard lands that go beyond existing natural features and still need to be incorporated into the Natural System.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.3.1	<ul style="list-style-type: none"> • Implementation of the prohibitions of development and site alterations and infrastructure contained in 7.3.1 (b) and (c) is not supported as they apply to natural features and areas that do not fall within the definitions of the PPS (i.e. those not “significant”). For the following reasons, any application of these policies to potential natural cover is not supported. The exceptions in Policies 7.3.1 (b) and (c) that state: “except in accordance with the policies in Sections 7 and 8” are too general and undefined to be understandable. Accordingly, City staff does not support 7.3.1 (a) to (c) as currently written. • Although earlier sections of the draft LCP acknowledge that development is defined differently in the PPS than in the Regulation under the CA Act, it is unclear which definition should be assumed for the different applications of 7.3.1 since some apply to matters that fall under TRCA’s regulatory functions and some would fall under the its advisory functions. • Policies 7.3.1 (e) (f) that require technical reports to be prepared in accordance with TRCA standards and Provincial Standards should also indicate that municipal policies respecting technical reports, must also be met. Written comments should provide better clarification of which matters fall within TRCA’s regulatory authority from those within its advisory authority by separating comments respecting lands and features with water resource and natural hazards (regulatory) from comments that address natural features and areas (advisory). 	<ul style="list-style-type: none"> • There may be natural features and areas that are not provincially significant that still warrant protection. • The definition of development in the PPS is the definition that would apply for the Chapter 7 Environmental Planning policies. • The text in policies 7.3.1 e) and f) has been modified to address your comment on municipal standards for technical reports. Additional wording has been added to the preamble for section 7.3 to explain how the policies in chapter 7 will be used (i.e., recommendations to approval authorities based on a collaborative approach). Policy d) has been modified to be more clear about exclusions to the prohibitive policies. 	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.3.1	<p>The proposal in Policy 7.3.1 (d) to require connection for isolated natural features to other natural features cannot be supported unless the connection is on lands also subject to the planning application under consideration. Further, this proposed policy appears to conflict with advice from the Region of Durham that the City may consider removal of some isolated natural heritage features from the natural heritage system being finalized for the environmental amendment, which is part of the City of Pickering Official Plan Review (currently underway).</p>	<p>The policies would only apply to the property that is the subject of a planning or EA application on which TRCA has been asked to comment. The wording of policy 7.3.1d) has been modified so as not to conflict with the Region's OP policy on isolated features. .</p>	Y
City of Toronto (Planning 2)	7.3.1	<p>To address TRCA's diverse jurisdiction, the LCP policies are intended to be broad and provide flexibility where appropriate but do not always align and may conflict with municipal OP policies. For example:</p> <p>(b) States that development and site alteration not be permitted in the Natural System except in accordance with the policies in Sections 7 and 8. If the Natural System extends outside of the regulated area, this policy may be in conflict with Toronto OP and zoning which may permit development in these areas;</p> <p>Given these different contexts, it is important that:</p> <ul style="list-style-type: none"> • there are no conflicts between LCP policies and municipal OP policies; • stakeholders understand that LCP policies will be interpreted in the context of municipal policies; • TRCA and municipal staff provide consistent messaging to applicants; • the policies are interpreted and applied in a consistent manner. 	<p>The preamble and policy wording in section 7.3.1 has been modified to more clearly acknowledge that municipalities are the approval authority for natural heritage systems planning.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.3.1	The description of the Natural System is vague (includes "...and potential natural cover and / or buffers"), and the policy implications substantial ("That development and site alteration not be permitted in the Natural System..."). Given the weight of the policy, a schedule should be included mapping the areas to which this policy applies (and subsequent related policies).	The policies in section 7.3.1 describe the process for defining the Natural System, which is done in cooperation with the proponent, and in consultation with the relevant municipality, and does not lend itself to the creation of a pre-determined jurisdiction (TRCA)-wide map. However, wording has been added to this section, in the preambles and the policies, to further emphasize that the Natural System is implemented by municipalities as approval authorities in the planning process.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.3.1	<p>The Living City Policies should reflect that Natural Systems will be developed by Conservation Authority partners and implemented through Official Plans and other Planning Act applications. Accordingly, it is recommended that the Living City policies utilize two different terms as follows:</p> <p>1. <i>Target Natural Heritage System</i> - as the Authority deems appropriate, the Living City policies which relate to the authority's role as an advisor to municipalities could reference the target natural heritage system in their "encourage" policies with respect to defining a Natural System. They may also choose to use this definition as it relates to their own land management and to a lesser extent as direction for regulation administration.</p> <p>2. <i>Natural System</i> - Per my comments on this definition above, the document should include a definition of Natural System (perhaps a modified version of policy 7.3.1 (e) which places the reliance on natural system definition with municipalities and their official plans (as further refined through site staking and mapping, technical reports, etc.). The prohibitive and other "strong" policies within Sections 6 and 7 (and to a lesser extent other sections) of this document would then be consistent with the terms of the Agreements for Planning Services and would appropriately recognize the framework set out in the Planning Act and PPS for delineating and protecting natural systems.</p> <p>(e) Policy should be deleted as a policy and incorporated into the definition of Natural System in a modified form.</p>	The preamble and policy wording in section 7.3.1 has been modified to more clearly acknowledge that municipalities are the approval authority for natural heritage systems planning.	y
Town of Ajax	7.3.1.1	An additional policy should be provided indicating that the TRCA will support local municipalities in their efforts to improve Lake Ontario water quality.	Meeting the criterion for water quality as outlined in the water management policies (7.4.1), and the goal for Source Protection in this section, both speak to these efforts.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.3.1.1	<ul style="list-style-type: none"> • (c) This is quite confusing since Sec. 7.3.1 (b, c and d) indicate in accordance with policies in Sections 7 and 8. The same reference to the policies in Section 7 and 8 would seem to be appropriate in this section as well. • (d) Please clarify "function of groundwater resources". Do you mean quality? 	<ul style="list-style-type: none"> • Policies in 7.3.1 and 7.3.1.1 are distinct from one another, since the 7.3.1.1 policies are for water resources, a component of the Natural System. The Natural System policies under 7.3.1 are general and apply to all components of the Natural System; these general policies make reference back to all of the policies in sections 7 and 8. The water resources policy c) refers back to the 7.3.1 Natural System policies so it does not need to refer to sections 7 and 8. • The function of groundwater resources is described in 7.4.1, as referenced in policy 7.3.1.1 d). However, the policy had incorrectly referenced 7.4.1.1 instead of 7.4.1; this has been corrected. 	Y
City of Markham	7.3.1.1	<p>(c) This policy identifies that all water resources be protected from development. This is a hard and specific policy, yet water resources are not defined and needs more clarification. For example, some water resources features may be managed (i.e., removed, altered, and relocated) depending on their importance and following the Markham Small Stream Study recommendations, as long as functions are preserved). Some groundwater features such as Clean Water Act Highly Vulnerable Aquifers have been assigned low vulnerabilities and do not require risk management policies. Protection should apply to defined sensitive features. We are also concerned with the use of "all" as there may be exceptions that warrant consideration. This policy defers to the policies in section 7.3.1 which are high level and vague (see previous comments).</p>	<p>Policy 7.3.1.1 c) refers to the Natural System policies in section 7.3.1, which refer to all of the policies in Sections 7 and 8. Throughout sections 7 and 8, there are policy exceptions that provide flexibility on the management of components of the Natural System, including water resources. Furthermore, policy 7.3.1.1 d) has been modified to refer to the Water Resources Management policies which more specifically address the maintenance and management of groundwater resources (Water Balance SWM criterion).</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.3.1.1	(d) This policy addresses the protection of groundwater resources. Protection policies should apply to sensitive resources or hydrologic functions supporting sensitive natural features. Less restrictive management policies can apply to other resources. We question why the notwithstanding policy linked to policy c) to protect the function of groundwater is only linked to section 7.4.1.1 (stormwater). Stormwater management infrastructure may not be the only infrastructure which may need an exception.	A policy has been added to the water resources policies to outline what constitutes water resources. Also, policy d) has been modified to be more clear about exceptions to the prohibitive policy c).	Y
Ministry of Municipal Affairs and Housing	7.3.1.1	Incorporate "sustainable function" in the goal.	Wording of the goal has been modified accordingly.	Y
Town of Richmond Hill	7.3.1.1	(c) This policy refers to the Natural System policies in section 7 .3.1, which then at times refers to exemptions outlined in Sections 7 and 8. This is a very confusing process to follow, which makes the intent of the policies difficult to understand. In reading all of the Natural Heritage System protection policies comprehensively the level of protection afforded to various components is unclear. Overall, the reader is left with the sense that development may be permitted in any part of the Natural System, reduced buffers will be permitted and potential natural cover areas are developable in most cases.	Consistent with the structure of the PPS, provincial plans, and similar to official plan policies, The LCP begins with prohibition policies and then provides exceptions due to areas of existing development or infrastructure, etc. However, Policies 7.3.1 b) and c) have been modified to be more specific about where policy exceptions are located, i.e., environmental management policies in 7.4 and 7.5, and in the regulatory policies in 8.4 to 8.13 where applicable.	Y
York Region (Long Range Planning, Public Health, ES)	7.3.1.1	<ul style="list-style-type: none"> • Surface and groundwater should be defined as a water resource in the same way watercourses and kettle lakes are. Aquifers are referred to as sub-surface landscape features which can intersect the land surface and express themselves in wetlands and watercourses. These represent a resource for municipal water supplies and should be defined as such. • Water Resources should be defined in the glossary. • Aquifer should be defined in the glossary as a groundwater resource to ensure consistency with the information presented in the text. 	<p>The topic of drinking water protection is covered in the Source Water Protection policies in sub-section 7.4.1.2.1.</p> <p>A policy has been added to describe what constitutes water resources. The glossary definition of aquifer has been modified to incorporate the word "groundwater".</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.3.1.1	Support watershed based long-term approach to protect water quality – aligns with our Safe Water program objectives.	Comment noted.	N
York Region (Long Range Planning, Public Health, ES)	7.3.1.1	Wetlands are included in Water Resources and Natural Features and Areas Sections of the LCP. Is there any potential for conflicting policy direction between these two sections?	No - both sections recommend protection as components of the Natural System.	N
Town of Ajax	7.3.1.2	The policies should be revised to indicate "natural features as identified an (in) area municipal official plans".	There may be features not identified in area official plans that still warrant protection (discovered upon site investigation).	N
City of Brampton	7.3.1.2	The qualification of the limits of Valley and Stream Corridors includes contiguous natural features and areas and references the 10m buffer; however, if any of these natural features are PSWs, the buffer would be different. Maybe more appropriate to reference "applicable buffer" as provided in Section...	The wording has been changed to "applicable buffer".	Y
City of Brampton	7.3.1.2	Paragraph 4: should qualify that TRCA is identifying that the Natural System is "significant" to reflect conservation at a watershed scale. It would also be helpful to discuss how the Natural System then applies to significance at the local scale.	The key point that paragraph 4 conveys is that there may be features that are not provincially significant that still warrant protection; in other words, they may be significant in the local context for a particular watershed or subwatershed.	N
Central Lake Ontario Conservation	7.3.1.2	Given that natural system and natural features are related, it may be useful to move policies for natural features following immediately natural systems policies (7.3.1)	All of the components of the Natural System are related to one another, i.e., water resources, natural features, natural hazards, buffers and potential natural cover - together, they comprise the Natural System.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.3.1.2	(a) Again reference to Sec. 7.3.1 is confusing when the broader reference of policies in Sec. 7 and 8 may be more appropriate.	Policies in 7.3.1 and 7.3.1.2 are distinct from one another, since the 7.3.1.2 policies are for natural features, a component of the Natural System. The Natural System policies under 7.3.1 are general and apply to all components of the Natural System; these general policies make reference back to all of the policies in sections 7 and 8. The natural features and areas policy a) refers back to the 7.3.1 Natural System policies so it does not need to refer to sections 7 and 8.	N
City of Markham	7.3.1.2	(a) This policy identifies the protection of "all" natural features and areas within the Natural System. This policy is too vague describing the protection of "all" features without distinguishing the needs for study and assessment. The policy seeks to protect features described in a vague manner and not mapped.	Policy a) refers back to 7.3.1, that contains policy 7.3.1 e) which outlines the steps to define the System, i.e., site visits, studies, OP policies, etc.	N
City of Markham	7.3.1.2	(b) This policy directs all features outside of the Natural System (vaguely described and not mapped) be assessed to determine the need to protect the features. Perhaps this policy should identify features located outside of the municipal natural heritage systems that are not currently protected by policy be assessed. Again the use of the word "all" is problematic since the some of the key terms are not defined. Clarification is required if this means assessment of site plans on all table lands in the jurisdiction.	Isolated features are physically disconnected from the Natural System, e.g., a stand-alone tableland woodlot. An example of this is illustrated in Appendix B. A policy has been added to define what constitutes natural features and areas.	Y
Peel Region	7.3.1.2	(c) This suggested policy could be interpreted as not supporting modification to "all" natural features and areas to accommodate development and goes well beyond the intent of some provincial and municipal requirement of protecting significant natural area features.	Consistent with the structure of the PPS, provincial plans, and similar to official plan policies, The LCP begins with prohibition policies and then provides exceptions due to areas of existing development or infrastructure, etc. However, policy 7.3.1.2 c) has been modified to be more specific about where policy exceptions are located, i.e., environmental management policies in 7.4 and 7.5, and in the regulatory policies in 8.4 to 8.13 where applicable.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Richmond Hill	7.3.1.2	This policy indicates "That all natural features and areas outside the Natural System be assessed in accordance with federal, provincial and municipal requirements to determine the need to protect the natural feature or area and its functions." How can there be natural features and areas outside the Natural System when the term "Natural System" is defined (both in the glossary and policy 7 .3.1 a) to include natural features and areas?	Isolated features are physically disconnected from the Natural System, e.g., a stand-alone tableland woodlot. An example of this is illustrated in Appendix B.	N
City of Brampton	7.3.1.3	It is the City's understanding that CAs regulate wetlands because of unstable soils; however, it is not spoken to in this section. Please qualify.	The policies in this section apply to all natural hazards as defined in the PPS, and as such, wetlands are not included. The regulation policies for wetlands are in Chapter 8.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.3.1.3	<p>The LCP states in a number of areas that Buffers are to be protected from stripping, filling and grading and to be restored and enhanced. However increasingly, infrastructure is being sited within environmental buffers such as LIDs to maintain water balance, or recreational trails. In addition, the LCP also notes that the (d) "buffer shall include the applicable erosion access allowances", and it is our understanding that the erosion access allowance is intended to facilitate a safety zone for people and vehicles to enter and exit an area during an emergency such as slope failure or flooding. The use of the buffer for both infrastructure and an erosion access allowance will diminish the function of the environmental buffers, particularly, the opportunity to fully naturalize the buffers in order for them to perform as intended.</p> <p>Therefore, is TRCA considering the need to increase buffer requirements and/or to define a "setback" to address other uses within the environmental buffer such as LID infrastructure, trails, etc. For example, the City has an OP policy requiring an additional 5 metre buffer for the development of a trail that is proposed in a particular feature and is unable to be sited within the existing environmental buffer.</p>	TRCA would support increased buffers for these purposes as stated in policy 7.3.1.4 b) "Any additional distances prescribed by federal, provincial, municipal requirements..."	N
Central Lake Ontario Conservation	7.3.1.3	Section 7.3.1.3 should make a reference to development that may be permitted in Hazard Lands.	A reference to exception policies has been added to 7.3.1.3 b) and f).	Y
Don Watershed Regeneration Council	7.3.1.3	(h) and (i) Add any accommodation/facility for the elderly or mentally or physically challenged.	This wording is from the PPS, section 3.1.5. It has been updated to reflect slightly new wording from the 2014 PPS.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Etobicoke-Mimico Watersheds Council	7.3.1.3	(a) What happens when there is a conflict between 7.3.1.2 and 7.3.1.3?	Question unclear.	N
City of Markham	7.3.1.3	These natural hazards policies are similar to policies in Markham's Official Plan. These policies need to identify the exception to the hazard land policies being the Special Policy Area policies and should have a specific policy reference to section 7.4.3.2.4.	A reference to exception policies has been added to 7.3.1.3 b) and f).	Y
Peel Region	7.3.1.3	There is no exception for lot creation within the flood fringe portion of the two zone flood plains, SPA flood plains or for the purpose of dedicating lands for public infrastructure purposes. TRCA staff should confirm if the intent of the policy is correctly stated and there are no situations where lot creation may be appropriate through limited exceptions in these types of flood hazard areas.	A reference to exception policies has been added to 7.3.1.3 b) and f).	Y
City of Pickering	7.3.1.3	(h) and (i): the meaning of an institutional use "associated with" the listed uses is confusing. We recommend it be revised to refer to an institutional use "including" the listed uses.	This wording is from the PPS, section 3.1.5. It has been updated to reflect slightly new wording from the 2014 PPS.	N
City of Pickering	7.3.1.3	(d) proposes that a buffer be applied to the limit of hazardous lands and sites and shall include the applicable erosion access allowances. Recognizing that the erosion access allowance is defined to ensure a safety zone for people and vehicles to access an area during an emergency, the policy should clarify whether the erosion access allowance should be added to the buffer or included within the required buffer.	The last sentence in d) states that the buffer includes the applicable erosion access allowances.	N
Ministry of Natural Resources	7.3.1.4	It is noted that development setbacks and buffers are simply termed "buffers". Development setback are traditionally considered as development limits for spatial separation from a hazard or from existing development/lot lines etc., whereas buffers have traditionally been determined on a scientific basis for protection of natural features. There may be merit in keeping these terms separate.	An example of the distinction made between buffers and setbacks is in policy 7.3.1.4 e). Erosion access allowances are included in buffers as stated in policy 7.3.1.3 d). Development setbacks in a regulated area are also distinctly described in the policies in section 8.4.7. Finally, the term "buffer" is defined in the LCP's Glossary.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	7.3.1.4	The Goal should be further articulated to indicate that it is not confined to Natural Systems or the Greenbelt, but elsewhere as well.	Comment unclear.	N
Town of Whitchurch- Stouffville	7.3.1.4	a) The implementation of this policy is complicated as there may no practical mechanism to acquire these lands (outside of Natural Systems and corridors) through the development process. Furthermore, given the relative pressure on the land budget in settlement areas in areas covered by Provincial Plans like the Oak Ridges Moraine Conservation Plan, and the Places to Grow: Growth Plan for the Greater Golden Horseshoe to achieve land use efficiency. It is unclear how the initiative by the TRCA to incorporate and expand the natural systems by incorporating potential natural cover lands into greenland systems will effect these planning programs. More information will be required on this initiative moving forward.	Policy a) is consistent with PPS sub-section 2.1.2, and Places to Grow policy 4.2.13.	N
Town of Ajax	7.3.1.4	7.3.1.4 and 8.4.7 b) - Wetlands - a minimum 10 metre buffer is required for wetlands other than provincially significant wetlands and wetlands on the Oak Ridges Moraine (Town OP requires a minimum buffer of 30 metres plus what is recommended in an EIS for any type of wetland). 7.3.1.4 and 8.4.7 b)-Wetlands-a minimum 10 metre buffer is required for wetlands other than provincially significant wetlands and wetlands on the Oak Ridges Moraine (Town OP requires a minimum buffer of 30 metres plus what is recommended in an EIS for any type of wetland).	These municipal provisions are accommodated in policy 7.3.1.4 b) by the statement, "Any additional distances prescribed by federal, provincial, or municipal requirements."	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.3.1.4	<ul style="list-style-type: none"> • Paragraph 2: Should qualify that the size of buffers may vary depending on the adjacent natural features. • Paragraph 3: Discusses erosion access allowance and indicates that Sec. 7.3.1.3 provides additional information; however, Sec. 7.3.1.3 only includes policy (d), not further information to qualify sizing an erosion access allowance, nor does the definition in the glossary. The sizing of an erosion access allowance needs to be clearer. • Furthermore, both this section and Sec. 7.3.1.3 (d) notes that the "buffer shall include the applicable erosion access allowances". Is this suggesting that the minimum 10m buffer provides the erosion access allowance? 	<ul style="list-style-type: none"> • A sentence to this effect has been added paragraph 2. • Paragraph 3 has been modified where it discusses erosion access allowances. • The size of buffers and erosion access allowances will vary as now described in paragraph 3. 	Y
City of Markham	7.3.1.4	(c) This policy deals with the protection of all buffers from stripping or grading. Although we appreciate the intent of this policy and generally support the principle, there should be some flexibility to allow some grading as these buffers will transition urban uses from natural heritage uses. We also note that recreational uses such as trails in appropriate locations, should be permitted in addition to restoration and enhancement.	The municipality may allow some grading given that these policies are recommendations to approval authorities. It is current practice to ask for preliminary grading plans early in the planning process, when development limits are being established, to avoid setting limits which will necessitate grading into the buffer at detailed design. The recreational use policies in section 7.4.5.1, state that minor recreational uses (such as trails) may be permitted within the System.	N
City of Brampton	7.3.1.4	(a) Please qualify how "potential natural cover" is to be determined? (d) Please qualify how the "connection" can be determined?	a) - see policy 7.3.1 e). d) - the last paragraph of the preamble for 7.3.1.4 generally describes how a connection may be identified.	Y
Central Lake Ontario Conservation	7.3.1.4	Perhaps a general statement to notify the applicant/developer when an EIS may be required would be helpful. Also, it may be helpful to have a statement that would relate to policies in 7.4.2.1 that guide development that cannot meet standard buffer requirements.	The requirement for technical reports (including EISs) is outlined in 7.3.1 e). The preamble preceding policy 7.4.2.1 discusses when it may be that buffer requirements cannot be met.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Environmental Defence	7.3.1.4	<p>Increase the minimum buffer requirements around natural features and hazards outlined in proposed policy area 7.3.1.4 (b).</p> <p>The buffers provided in the LCP as a standard is not protective enough for human safety or ecosystem health. At a minimum, without an environmental assessment completed that confirms a smaller buffer is sufficient the standard should be 50 metres. The assessment must include an analysis of potential threats to the land and any uses or structures due to urbanization and climate change (e.g., the increased likelihood of major weather events, less winter snow coverage, and flooding due to both Increased impermeability of the watershed and changing weather patterns). Failing to account for this and using only the existing buffers will result in increased risk to human safety and costs for landowners, municipal taxpayers and insurance companies.</p> <p>The Rouge Park North Management Plan could provide the basis of such a policy, where a buffer is determined based on an assessment of the sensitivities of the adjacent Nature Reserve and the potential for Impact from the proposed use of the feature. To reiterate, until a scientific assessment is completed, the minimum buffer around natural hazards and features should be 50 metres.</p>	<p>The policies as drafted do not preclude the application of buffers greater than those cited in The LCP. TRCA's planning policies are recommendations to approval authorities in the planning and environmental assessment processes, and acknowledge current federal, provincial, and municipal standards and requirements.</p>	N
City of Markham	7.3.1.4	<p>This section deals with potential natural cover and buffers. Markham staff have concerns with the manner in which the "potential natural cover" policies are articulated. This is perhaps the most difficult aspect of natural heritage management restoration and enhancement of non-natural heritage lands. These policies are far too vague and need to have a stronger alignment with municipal Official Plans.</p>	<p>Policy 7.3.1.4 a) refers back to the policies in 7.3.1, which outline the steps to define the System, i.e., <i>OP policies</i>, site visits, studies, etc. In policy 7.3.1.4 b), the provision for additional distances from federal, provincial, or municipal requirements has been bolded to increase its prominence. Also, some wording has been added to the preamble in 7.3.1.4 regarding municipalities' version of potential natural cover (e.g., enhancement areas, restoration areas) becoming part of their natural heritage systems in official plan policies and mapping.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.3.1.4	(a) This policy identifies that "all areas of potential natural cover" be protected for restoration and enhancement'. We do not support this policy as the TRCA potential natural cover lands are unmapped and there is no way to confirm that these lands would be consistent with the City's enhancement lands. This policy exceeds TRCA's "commenting" role by directing that "all areas of potential natural cover be protected". This policy should be reworded to direct the TRCA to work with or encourage municipalities to protect municipally identified enhancement areas.	Policy 7.3.1.4 a) refers back to the policies in 7.3.1, which outline the steps to define the System, including the component of potential natural cover, which will be identified through <i>OP policies</i> , site visits, studies, etc. Also, policy 7.3.1 g) states that TRCA and municipalities continue to work together to establish mapping for the different components of the natural system in municipal OPs.	Y
City of Markham	7.3.1.4	(b) This policy identifies the TRCA buffer requirement. The TRCA buffer requirements are generally less than those now required in Official Plans. The exception is noted as the last policy comment. We recommend that a stand alone policy be included to identify that other buffers as may be prescribed in Provincial Plans or Official Plans may exceed the TRCA buffer requirements and shall be identified and applied by municipalities.	As noted, the preamble for 7.3.1.4 and policy 7.3.1.4 b) have been modified to make the requirements of municipalities for setting buffers more prominent.	Y
Ministry of Municipal Affairs and Housing	7.3.1.4	pg 68 - "Provincial Standards".	The words "and standards" has been added where provincial requirements are mentioned.	Y
Ministry of Natural Resources	7.3.1.4	There are many references to features of the Oak Ridges Moraine (ORM) but no references to the Greenbelt Plan areas (regarding buffers, setbacks etc.). The ORM is completely contained within the Greenbelt Plan area. However, it is not the same the other way around. Accordingly, "Greenbelt Plan area" should be inserted where all(?) such references to the ORM are made.	For recommending the limit of the Natural System, the policies in 7.3.1.4 of The LCP reference all federal, provincial or municipal requirements that must be applied, which would include any distances prescribed by the ORM and GB Plans. To highlight this, we have added Greenbelt as an example in this policy.	Y
Peel Region	7.3.1.4	(a) and (b) These policy areas may be difficult to interpret and apply especially if it is subject to some other form of current land use.	Acknowledged, however, implementation occurs through a negotiated solution in the planning process where the municipality is the decision-maker.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Federation of Agriculture	7.3.1.4	The PFA objects to the lack of a major re-forestation initiative in the LC Policies.	The LCP does contain a major re-forestation initiative, based upon TRCA's Board approved Terrestrial Natural Heritage System Strategy (2007). The Potential Natural Cover component of the Natural System represents a major natural cover restoration initiative (forest and wetland) that will hopefully increase natural cover in TRCA watersheds from 25% to 30% over time.	N
City of Pickering	7.3.1.4	We support the concept of "potential natural cover" as a sound objective to protect the ecological health of a watershed as a whole. Similarly, the concept of the target terrestrial natural heritage system is supported as a concept.	Comment noted.	N
City of Pickering	7.3.1.4	(a) is too simplistic and broad. It calls for "all areas of potential natural cover, to be protected for restoration and enhancement, in accordance with Natural System Policy 7.3.1. Policy 7.3.1 includes prohibition of development and site alteration and infrastructure within potential natural cover areas. These intentions conflict with the general PPS policy to balance application of the full range of PPS policies.	Balance is provided by being structured similarly to provincial plans with prohibition policies followed by policy exceptions. The policies in 7.3.1, which 7.3.1.4 a) refers back to, have been modified to be more specific about policy exceptions.	Y
Town of Richmond Hill	7.3.1.4	(b) indicates that a 10 metre buffer from the greater of the long term stable top of slope/bank, stable toe of slope, Regulatory flood plain, meander belt, and any contiguous natural features or areas will be applied to Valley or Stream Corridors - The Oak Ridges Moraine Conservation Plan requires a 30 metre buffer (i.e., should the buffer requirement not be worded similar to the way the wetland requirement below it is worded?).	This requirement is captured by the statement in policy b): "Any additional distances prescribed by federal, provincial, or municipal requirements."	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Richmond Hill	7.3.1.4	<p>We note that it has been TRCA's practice to include all "contiguous vegetation" within the limits of valley and stream corridors during staking exercises rather than "contiguous natural features." We believe that it is contiguous natural features (i.e., significant vegetation) that should be included (i.e., the policy is correct) and not all contiguous vegetation (i.e., invasive and non-native species) and note that the TRCA should ensure that this distinction is made during feature staking exercises (i.e., contiguous, non-native/invasive vegetation should not be used to define the edge of features). Additionally, we feel that, in general, the policies need to speak directly to staking exercises and define exactly what is being staked. What policy is driving the staking exercises?</p>	<p>Feature staking is a procedure that is outlined in TRCA's Planning and Development Procedural Manual.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Toronto (Planning 2)	7.3.1.4	<p>Buffers and setbacks help to reduce the negative impacts of development on natural features and functions. Setbacks are also used to reduce risk to life and property. In the City of Toronto, buffers and setbacks also provide much needed space for canopy and habitat. Policies in the LCP document recommended buffer widths and development setbacks and provide the flexibility to reduce both. In the highly urbanized context of the City of Toronto, where development is often located close to valleys, ravines, and bluffs, setbacks and buffers frequently overlap. In these situations, a reduced setback will also result in a reduced buffer. Given the multiple functions that buffers and setbacks provide, protection of these areas is a high priority for the City. This priority is reflected in the City's Zoning Bylaw and Official Plan which both require a minimum 10 metre setback from long term stable top of bank. To support protection of these areas, the City recommends that a discussion about the multiple functions of buffers and setbacks be included in the preamble or sidebar to the LCP policies and that municipal Official Plan and Zoning Bylaw policies be considered when evaluating requests for reduced buffers or setbacks on applications involving consent, rezonings and Official Plan amendments. If reduced development setbacks are being considered by TRCA, and there is a conflict with the Zoning Bylaw or Official Plan, it is recommended that City Planning staff be consulted.</p>	<p>Paragraphs 2 and 3 in the preamble for 7.3.1.4 discuss the functions of buffers. A sentence has been added to indicate that the size of a buffer will vary depending on municipal and provincial requirements. Policy 7.4.2.1 a) recommends to approval authorities that a reduced buffer may be permitted, but only in accordance with federal, provincial and <i>municipal</i> requirements.</p>	Y
City of Toronto (Planning)	7.3.1.4	<p>(e) States that "municipal structural setbacks on buildings and structures that may be required for maintenance be outside of buffers and areas of potential natural cover". How does this policy apply if structural setbacks established by Official Plan/Zoning By-Laws are different from the LCP policy?</p>	<p>This policy is a recommendation to approval authorities.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Vaughan	7.3.1.4	Generally, section 7.3 reads in a prescriptive manner where TRCA does not have the authority. The Target Terrestrial Natural Heritage System has no real status as an official document or plan except as accepted by the municipality and integrated into official plans. Policy 7.3.1.4 (a), for example, is problematic as it prescribes the protection of potential natural cover areas defined by TRCA. The TRCA areas of potential natural cover offer one approach to restoration and natural heritage system definition. One solution is to add "and in accordance with municipal official plans" at the end of policy 7.3.1.4 (a), and elsewhere that this distinction needs to be clear.	These policies are recommendations to approval authorities. Policy 7.3.1.4 a) refers back to the policies in 7.3.1, which outline the steps to define the System, i.e., site visits, studies, OP policies, etc. In policy 7.3.1.4 b), the provision for additional distances from federal, provincial, or municipal requirements has been bolded to increase its prominence. Also, some wording has been added to the preamble in 7.3.1.4 regarding municipalities' version of potential natural cover (e.g., enhancement areas, restoration areas) becoming part of their natural heritage systems in official plan policies and schedules.	Y
York Region (Long Range Planning, Public Health, ES)	7.3.1.4	(b) There are conflicts within this policy in that it speaks to natural areas outside of the natural system but with the current definition all natural areas are contained within the natural system (as well as areas of potential natural cover).	This policy refers to a situation where a natural feature or natural hazard falls outside of the Natural System, e.g. a tableland woodlot. An example of this is illustrated in The LCP's Appendix B.	N
York Region (Long Range Planning, Public Health, ES)	7.3.1.4	(c) Not supportive of the proposal that buffers be protected from stripping, filling or grading. One of the main functions of buffers is to provide the transition zone between natural features and the adjacent land use. Frequently buffers are used to absorb grade changes between the two uses without the need for retaining walls. This policy could result in the need to "buffer" the buffers, or there may be a large number of retaining walls at the limit of the buffer.	We disagree that buffers are for absorbing grade changes. It is current practice to ask for preliminary grading plans early in the planning process, when development limits are being established, to avoid setting limits which will necessitate grading into the buffer at detailed design.	N
City of Brampton	7.3.2	(e) Please qualify that this is referencing fencing between private lands and the Natural System. (f) Please qualify that this is referencing TRCA's lands.	Both e) and f) have been revised to provide greater clarity in these respects.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Federation of Agriculture	7.3.2	The PFA strongly objects to these proposed policies which are ultra vires, "beyond the legislative powers", of the <i>Conservation Authorities Act</i> .	Gratuitous dedication of lands to a public body is only recommended for natural features and natural hazards that should not be developed as part of a development application under the <i>Planning Act</i> . TRCA recommends their dedication to a public agency for long term protection of natural system features and functions and to protect public health and safety by preventing future potential development from occurring on hazardous lands and hazardous sites. The cited example was the subject of a previous meeting and discussions with PFA in 2012.	N
Town of Ajax	7.3.2	A policy should be incorporated to indicate that the TRCA recognizes and encourages the practice of ecological gifting of natural features as provided under the Income Tax Act.	Paragraph 1 in this section and policy 7.3.2 d) refer to TRCA's Greenlands Acquisition Project (2011-2015), which is where other tools for acquisition are discussed.	N
Durham Region	7.3.2	It is suggested that Policy 7.3.2 a) be revised to identify that public ownership may mean either the TRCA or the area municipality.	The term "public" indicates that it could be TRCA, a municipality, or other public agency.	N
City of Markham	7.3.2	(f) This policy references the preparation of archaeological assessments in accordance with TRCA's Procedural Manual. The City of Markham undertakes archaeological assessments in accordance with City and Provincial policies and procedures. This policy should also reflect municipal practices.	Policy 7.3.2 f) has been modified to clarify that this is for TRCA lands only.	Y
City of Markham	7.3.2	(e) This policy directs fencing at the property limit of the Natural System. Markham does not generally fence off the Natural System, except in residential areas. This policy should be softer and direct decisions regarding fencing to the context of the landscape.	Flexibility is provided through policy wording, i.e., "To generally require..."	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Niagara Escarpment Commission	7.3.2	<p>Escarpment Natural Areas are designated as such in the NEP because they represent the most significant Escarpment features and areas. It is conceivable that the majority of areas will likely be included in TRCA's Natural System; however, there may be some instances where designation criteria for Escarpment Natural Area may capture additional lands. Therefore, TRCA may want to consider listing Escarpment Natural Areas as an additional priority for acquisition to ensure long term protection of this World Biosphere Reserve.</p> <p>For lands in the TRCA's Natural System that are within the NEPA, acquiring additional properties for conservation purposes aligns with the Niagara Escarpment Parks and Open Space (NEPOSS) objective to complete a system of public lands through land acquisition and open space planning (NEP, Part 3.1.1).</p> <p>An additional objective of NEPOSS is to secure a route for the Bruce Trail to permanently connect parks and open spaces in the System. NEC staff note that sections of the Bruce Trail as well as the "optimum route" identified by the Bruce Trail Conservancy are privately owned within TRCA's watershed. To compliment this NEPOSS objective, it would be desirable to also make the Bruce Trail corridor a priority for acquisition by TRCA, working in cooperation with the Bruce Trail Conservancy.</p>	Comments noted and forwarded to TRCA's Property Services and Conservation Lands divisions.	N
Peel Federation of Agriculture	7.3.2	The PFA objects to the lack of any compensation for private landowners who have the normal use and enjoyment of their lands removed arbitrarily.	Gratuitous dedication of lands to a public body is only recommended to the planning approval authority for natural features and natural hazards that should not be developed as part of a development application under the <i>Planning Act</i> . What is meant by "normal use and enjoyment of lands"?	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Toronto (Water)	7.3.2	In respect of conveyance of lands into public ownership, it is suggested that Section 7.3.2 could address Environmental Site Assessment, so that conveyed lands do not present unexpected maintenance surprises.	Policy 7.3.2 h) captures these requirements - it refers to the Planning and Development Procedural Manual where these types of requirements are listed.	N
York Region (Long Range Planning, Public Health, ES)	7.3.2	(e) Should this policy be revised to only require fencing between residential areas and natural systems? I believe that in a number of instances we're trying to make incorporate natural systems into the communities through the use of single loaded roads etc. In those instances, sometimes it's desirable to not fence them.	Flexibility is provided through policy wording, i.e., "To generally require..."	N
York Region (Long Range Planning, Public Health, ES)	7.4.1	<ul style="list-style-type: none"> • Linkages should be made between Storm Water Management and Source Water Protection (e.g. groundwater recharge and significant groundwater recharge areas). • Provide additional examples of risks of inadequate flood control e.g. water quality, sewage contamination, mould. 	<ul style="list-style-type: none"> • Addressed through water balance for groundwater recharge stormwater management criterion (preamble for 7.4.1.1) and in Source Water Protection (7.4.1.2). • Some wording has been added to the preamble for Water Management 7.4.1 to indicate a connection to human health. 	Y
Town of Ajax	7.4.1.1	<p>Policies/references should be included regarding best practices for intensification on existing impervious sites.</p> <p>Section 7.4.1.1 says "there is a potential that flood risks downstream can increase for the Regional Storm event". There is no recommendation on how this event needs to be managed. If reference is made to the TRCA Stormwater Management Criteria then they should be part of the document.</p>	<p>Policy 7.4.1.1.1 c) speaks to redevelopment of existing impervious sites. The second paragraph under Water Quantity in 7.4.1.1 states that TRCA's SWM Criteria document identifies the need to study the regional flood control issue.</p> <p>Policies for meeting the SWM criteria, as more specifically described in the SWM Criteria document, are in policies 7.4.1.1.1 a) through h).</p>	N
City of Brampton	7.4.1.1	Should also recognize that agriculture affects the quality of runoff as well as development.	SWM criteria are required to be met for urban development.	N
Etobicoke-Mimico Watersheds Council	7.4.1.1	What about the use of stormwater ponds as part of new development?	SWM ponds can be one of the practices in a treatment train approach for meeting the SWM criteria.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.4.1.1	<p>Objective bullet #4 deals with water balance. Clarification and or definition is needed regarding `natural features' where runoff volume and distribution objective would apply. TRCA SWM Criteria document page 26 indicates this objective would apply to features identified for protection in an OP, watershed plan, etc., and not all natural features. Protecting and restoring runoff volumes to all natural features (e.g., all watercourses) is not technically possible. The Objective should focus on critical, or sensitive, natural features. This issue is also closely tied to permanent dewatering (see comments on later on Section 7.4.4.1.1). In terms of flood control, climate change should be mentioned as a contributory factor of flooding, and more research into this area is required to update stormwater management criteria. In terms of Low Impact Development(LID), there is currently no design criteria or design "credit" for the implementation of LID. The maintenance of LID on private properties remains a risk that has to be managed. The TRCA SWM Criteria document does not mention climate change impact mitigation as the basis for any flood control, water quality management, erosion control or water balance/recharge criteria. The reference to climate change should be removed until impacts can be quantified/estimated and mitigation is explicitly considered in the stormwater criteria document, or in impact assessments. The policies in 7.4.1.1.1 that follow do not have a tie in to climate change and only refer to pre and post development conditions and not future, projected conditions.</p>	<p>The policy for meeting the water balance criterion is in 7.4.1.1.1 a) and refers to the TRCA SWM Criteria doc for technical guidance on implementing the policy.</p> <p>We acknowledge that the SWM Criteria Document does not address climate change specifically, and that research on the effects of climate change on flood control is ongoing (as discussed in Section 6.2 of The LCP). However, the LCP is a forward-looking document with an expected 10-year life span. Therefore, climate change remains in the goal with the qualification of "the <i>potential impacts</i> of climate change". In addition, this is consistent with the 2014 PPS that states that infrastructure should consider the impacts of climate change.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Region	7.4.1.1	These policies appear to be focused on TRCA's development review role and do not provide plan input policy guidance for stormwater management. Regional staff recommends that TRCA provide broad, strategic model policies for stormwater management suitable for adoption within municipal official plans (e.g. policy direction that municipalities prepare master stormwater management practices, and strategies for undertaking stormwater management improvements and retrofits in existing developed areas). The Greenbelt Plan provides a simple structure for the development of model policies for official plan purposes that may be a starting reference.	Through TRCA's input to recent official plan reviews, several municipalities have adopted similar stormwater management policies to those within the LCP. In addition, policies specific to plan input (OP review) are in section 7.5.	N
City of Brampton	7.4.1.1.1	(a) please define recreational use in the glossary.	Glossary has been updated.	Y
Durham Region	7.4.1.1.1	(c) It is suggested that the phrase "wherever possible" be added to Policy 7.4.1.1.1 c) after "development area". Although supportive of the need for retrofitting stormwater management controls when redeveloping urban areas, it should be recognized that there might be sites where this is not feasible.	The policy states that the retrofit plan will be "developed in consultation with the municipality" and "with the goal of meeting" the criteria; this type of wording provides flexibility.	N
Durham Region (Works Dept.)	7.4.1.1.1	Please confirm the policies in this section do not apply to any road widening or paving as meeting the criteria may not be feasible or practical (from a cost perspective).	Policy 7.4.1.1.1 a) refers to infrastructure which would include roads, therefore the policies in this section do apply to roads. This is reflective of current practice where treating roads for SWM has been shown to be feasible and more "practical" through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	N
Don Watershed Regeneration Council	7.4.1.1.1	(c) What is the larger development area? Not defined in Glossary.	Reference to this term has been removed.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.4.1.1.1	<p>(a) This policy directs that all development and site alteration meet TRCA's stormwater management criteria. Clarification is required if development includes single lot residential infill where impervious surface is converted (e.g., larger driveways and homes). Markham has a Special Policy Area and other flood vulnerable areas where this is of interest, Where properties do not undergo site plan approval, there is no review process where policies would be applied/enforced or technical analysis required (i.e., minor variances, or single lot residential per TRCA SWM Criteria document page 6). Policy should apply where there is a review process for enforcement and legal authority. In terms of redevelopment & site alteration, this policy only requires meeting current SWM criteria if the pervious surface is being converted to impervious. Markham requires any redevelopment to meet current SWM criteria even if the existing surface is impervious, (e.g., a paved surface parking lot).</p>	<p>TRCA's SWM Criteria Document's section 2.1 contains a discussion of project scale and the planning process. With respect to properties in Markham that do not undergo site plan approval, requirements for building permits, if in TRCA's screening area, may be flagged to TRCA at which time, TRCA staff would review for SWM in accordance with the SWM Criteria document. Like all of the policies in Chapter 7, the SWM policies would only apply when an application has been circulated to TRCA for comment by the municipality.</p> <p>The statement about pervious to impervious surface has been removed in order to capture all instances where the hydrological cycle is being altered.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.4.1.1.1	(b), (c), (d) These policies deal with redevelopment and site alteration. Implementation of SWM criteria is usually through a plan of subdivision and site plan control process. It appears that applying SWM criteria to OPA and ZBA is premature. Markham does not agree that "retrofit plans be developed in consultation with TRCA" if the development area is outside of the TRCA regulatory area. Markham will implement its own SWM criteria. Staff do not agree with policy (d) except where the development or site alteration areas are within TRCA regulatory areas. All technical reports do not need Terms of Reference (ToR) to define scope, as only large scale studies (e.g., subwatershed study, MESP) may require ToRs. The scope should be determined by the municipality in consultation with TRCA. Many smaller technical reports (e.g.. design briefs) may follow only a standard Table of Contents. Policy (h) need further elaboration regarding how and where to "promote development design". Will this be on the developed site or for updates to design criteria?	At the first and highest levels of the planning process (where the principle of development is established) is when changes to watershed hydrology, including the potential for downstream flooding impacts, should be identified. TRCA's SWM criteria set out the hydrologic parameters under which such analysis would take place. The SWM policies for retrofit plans and technical reports, like all of the planning policies in Chapter 7, would only apply when an application has been circulated to TRCA for comment by the municipality. We have added "to the satisfaction of the municipality" to policy b). The words "where appropriate" have been inserted into policy d) to indicate that a terms of reference may not be necessary in all cases. Also, the Project Scale section in the SWM Criteria document provides further guidance in this regard. Policy h) is worded generally to indicate that the opportunities for promotion of adaptable design be taken at any stage in the process: from policy development, to technical criteria updates, preliminary concepts through to detailed design.	Y
City of Mississauga	7.4.1.1.1	(c) Response would be appreciated simply to acknowledge that TRCA will recognize pragmatic constraints (e.g. ownership, financial, etc.) in implementing this or to acknowledge this consideration in the document.	The policy states that the retrofit plan will be "developed in consultation with the municipality" and "with the goal of meeting" the criteria; this type of wording provides flexibility.	N
Ministry of Municipal Affairs and Housing	7.4.1.1.1	pg 73 - Strengthen re: "Treatment Train"	Policy 7.4.1.1.1 e) regarding the treatment train approach has been strengthened by removing "To recommend" from the policy and by incorporating a reference to Provincial standards (MOE SWM Planning and Design Manual).	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.4.1.1.1	<p>The City does not support TRCA’s apparent assumption in Policies 7.4.1.1.1 (b) and (d) of the sole authority to set criteria for technical reports on matters related to planning applications.</p> <p>A critical component of the long-term effectiveness and sustainability of municipal stormwater management infrastructure is the ease with which maintenance operations can be completed. Inadequate access can vastly increase the cost and complexity of maintenance operations. Given that the continued erosion control, and water quality and water quantity treatment functions of stormwater management facilities requires maintenance, access to such facilities must be recognized in TRCA’s policies.</p> <p>Since TRCA plays an important role in the review and approval of stormwater management infrastructure, TRCA’s policies should acknowledge the critical importance of future maintenance requirements in the design of stormwater management infrastructure.</p> <p>Furthermore, where stormwater management infrastructure is located within the Natural Heritage System there is potential for conflict between TRCA’s policies and municipal requirements for maintenance access roads to stormwater management infrastructure. It is the opinion of the City of Pickering that the TRCA’s Natural Heritage System and Stormwater Management policies should recognize that maintenance access roads be required for stormwater management facilities.</p>	<p>These policies are reflective of current practice of TRCA's review of applications for meeting SWM Criteria. The criteria are consistent with provincial and municipal requirements for SWM, which were consulted on with all stakeholders through the development and approval of TRCA's SWM Criteria Document. Policy 7.4.1.1.1 b) has been amended to include, "to the satisfaction of TRCA <i>and the municipality</i> ." Please refer to policies in 7.4.4.1.3 of the LCP with respect to SWM infrastructure siting and maintenance within the Natural System.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Richmond Hill	7.4.1.1.1	(a) states that all site alteration, infrastructure and recreational use must meet TRCA's SWM criteria when a pervious surface is being converted to an impervious surface. Does this also apply when the italicized works change the runoff coefficient, however, does not create a completely impermeable surface?	This statement has been removed to capture all instances where the water cycle is altered.	Y
Town of Richmond Hill	7.4.1.1.1	(c) What if the redevelopment area manages 100% of their SWM on site? Would the proponent still be required to address the larger development area? Not all existing portions of development or infrastructure can meet current criteria because of space limitations, property ownership, impacts to other surrounding features might not warrant increased SWM control, etc.	The statement to address the larger area has been removed.	Y
City of Toronto (Planning 2)	7.4.1.1.1	(a) and (b) Specify that all development and site alteration, infrastructure, and recreational use meet TRCA's stormwater management criteria, and that the criteria apply throughout the planning and development process. The City welcomes the reference to "all" because it is not just large scale development that should be subject to the criteria; the cumulative impact of small scale developments needs to be considered. The City encourages TRCA to ensure that these policies are applied consistently to all scales of development.	Comment noted.	N
City of Vaughan	7.4.1.1.1	(c) regarding stormwater management may require text to indicate how it is determined that stormwater management controls are absent or outdated, such as through evaluations undertaken by the municipality and/or the TRCA or through technical reports submitted by the applicant that address engineering design criteria to municipal and/or TRCA standards.	The policy has been modified to be more clear about "outdated" SWM controls, i.e., those that do not meet current criteria.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Waterfront Toronto	7.4.1.1.1	Consider adding a policy to encourage integration with innovation with respect to developing stormwater management infrastructure. Waterfront Toronto's Sherbourne Park is a great example of a reinvention of infrastructure, integrating building facilities for a park, with landscape and art design, and stormwater management infrastructure.	Chapter 6 advocacy policies for green infrastructure encourage this type of innovation; Chapter 7 policies reference the SWM Criteria Document and the LID SWM Planning and Design Guide which promote innovative approaches. Also, policy c) in 7.4.4.1.3 recommends integration of SWM facilities with the community where safely accommodated.	N
Ministry of the Environment	7.4.1.2	Information on source water protection includes both the goal and objectives of the policies. It might be useful to consider doing this for all policy areas.	All of the environmental <i>management</i> policy sections begin with a goal and objectives.	N
York Region (Long Range Planning, Public Health, ES)	7.4.1.2	<ul style="list-style-type: none"> Regional and Local Official Plan policies should be acknowledged in this section to bring awareness to potential developers, consultants, and business owners. The preparation of the Assessment Report section should identify Wellhead Protection Areas and Intake Protection Zones not just identification of significant drinking water threats. 	<ul style="list-style-type: none"> Agreed; text amended accordingly (see end of para. 2). Agreed; text amended accordingly. 	Y
City of Markham	7.4.1.2.1	(a) (ii) This policy deals with lead partner role in education, stewardship and outreach. Clarification is required regarding the role of York Region and the municipality. Has the Region's role been delegated to TRCA? There is considerable coverage of low vulnerability score areas (no significant threat potential) in Markham that require this education, stewardship and outreach.	Agreed; policy amended accordingly.	Y
Town of Richmond Hill	7.4.1.2.1	(a) states that TRCA will participate as a lead partner in undertaking stewardship, education and outreach to landowners in vulnerable areas. Many of the policies in the proposed CTC Source Protection Plan provide for the Province (MOE) or Municipality to create Outreach and Education material. We suggest the policy should state that the TRCA will work with these partners to ensure consistent messaging to landowners in vulnerable areas.	Agreed; policy amended accordingly.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.4.1.2.1	(a) Should also include updates to the Assessment Reports and Source Protection Plans.	Agreed; policy amended accordingly.	Y
City of Brampton	7.4.2	<p>Paragraph 2: Please qualify whether the planning or environmental assessment document must recommend that compensation be required as part of the approvals process.</p> <p>Compensation criteria: Please qualify that it is preferable that compensation take place as close as possible to the area of natural feature loss.</p> <p>Please note that City staff has not been consulted on TRCA's Compensation Protocol and may provide additional comments on the appropriateness of this policy when details of the protocol are available.</p>	<p>As stated in paragraph 3, compensation can take place only where the approval process permits it, but how the permission is confirmed (in writing or otherwise) is not specified; it may be different for each case, depending on the preference of the approval authority.</p> <p>We have modified the wording in the sidebar to acknowledge that it is preferred for the compensation to take place in proximity to the loss.</p> <p>Comment noted.</p>	Y
City of Brampton	7.4.2	Objective (Bullet 3): It is not clear what is meant by "enhance ecosystem services from ... developable lands through natural features and areas management". Possibly this should read to enhance ecosystem services from developable lands by creating natural cover, improving urban tree canopy, etc.?	Policy 7.4.2.1 f) addresses this by recommending a natural approach to landscaping of developable lands. Enhancements to the urban forest are encouraged through in the Green Infrastructure policies in Chapter 6 (6.7.1 b)).	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.2	Another new policy area in the LCP will be the requirement for compensation for the loss/removal of natural features. Various sections/policies speak to "significantly improve" and "enhancement" of the Natural System. However, more current municipal and provincial "requirements" now speak to how the loss of natural features should be addressed including, "no net loss and a net gain in natural features and functions", and compensation that provides a "net benefit" (Endangered Species Act). We would recommend that TRCA seek to use similar terminology for compensation based on what is being sought in the long term conservation of the Natural System.	These types of comments will be vetted through the consultation process for the draft TRCA Compensation Protocol. Should the terminology change for the Protocol, the policy will change accordingly.	N
Durham Region	7.4.2	The use of compensation only as a "last resort" management tool for Natural Features and Areas is supported.	Comment noted.	N
City of Pickering	7.4.2	<p>The TRCA has not released its proposed Compensation Protocol to date. When the TRCA initially released its "Target Terrestrial Natural Heritage System", compensation was proposed to be implemented on lands owned by other than TRCA felt should be part of the target terrestrial natural heritage system. The Planning Act allows municipalities to regulate land uses to ensure compatibility with uses on other affected lands but does not authorize a transfer of obligations to lands remote from the application site. Land use policies and designations in official plans and zoning provisions that would identify lands as "potential natural cover" or target terrestrial natural heritage for purposes of conservation, as set out in the Natural Systems portion of section 7.3.1 is beyond the powers of the municipality and accordingly should be reconsidered.</p> <p>In our view, the policy proposed to achieve habitat/features restoration in potential natural cover areas should be permissive and voluntary, not mandatory as currently framed.</p>	The policies seek the incorporation of potential natural cover lands into the Natural System, much like a buffer to natural features is incorporated into non-developable blocks of a development application. This is consistent with current practice where TRCA's comments on setting aside lands from development relate only to the lands subject to the application circulated by the municipality. It is also consistent with the PPS definition of natural heritage system that includes "lands with the potential to be restored."	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.4.2	<p>The following principles should be given consideration in the formulation/finalization of the Compensation Protocol:</p> <ul style="list-style-type: none"> • to mitigate net negative impacts on the environmental health of a watershed or subwatershed; • in situations where on-site mitigation cannot be negotiated as a condition of approval of a planning application; • TRCA will recommend that municipalities negotiate with planning applicants; • the restoration and/or enhancement on lands within the target area of the watershed or subwatershed; • mitigation be considered on lands owned by willing host public agencies, or on privately owned lands whose owners voluntarily agree to provide for mitigation on a site away from the development site, and other private owners who voluntarily agree to steward the restoration that results from this arrangement; • at the expense of the planning applicant site owners. <p>TRCA may wish to advocate for municipal official plan policies to support strategies to achieve potential natural cover principles in a manner that falls within the policy provisions of the PPS and be more directive only for those aspects of Policy 7.3.1 related to water resources and natural hazards lands.</p>	<p>Thank you for these principles which are valuable to consider in the development of the Compensation Protocol. They are noted and will be passed along to staff leading that project. Some of them are captured in the text box in 7.4.2 of the LCP, on what to consider if compensation is required.</p> <p>Policy 7.3.1 g) states that TRCA will continue to work with municipalities to develop mapping for the Natural System in their official plans, in accordance with provincial direction.</p> <p>Overall, the planning policies are representative of TRCA's commenting role and are therefore recommendations to approval authorities. Wording to this effect has been added to the preamble of Chapter 7 in order to emphasize this.</p>	Y
City of Vaughan	7.4.2	References to the TRCA proposed "compensation protocol" should reflect the need for appropriate municipal review and endorsement.	The sidebar on consultation indicates stakeholder review is pending. This box will be removed once the review is complete. The policies for compensation also stipulate that it cannot be for features protected by federal, provincial or municipal requirements.	N
Town of Ajax	7.4.2.1	(a) Reference should not be made to reducing this requirement. Perhaps further articulation of the policy to indicate that where built encroachments already exist, the feature will not be further encroached upon, and enhancements would need to be provided.	Policy 7.4.2.1 a) has been modified to address these points.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.2.1	(g) Please consider flexibility with regard to the loss of natural features and opportunities for compensation. (i) Please qualify whether you are actually referring to 7.4.2 (h).	Compensation may not be an option where contravention of a by-law or regulation has occurred. Yes, policy i) has been corrected to refer to policy h).	Y
Central Lake Ontario Conservation	7.4.2.1	(d) Is this policy meant to convey that compensation will be used as a last resort, after all of the other methods geared towards a feature's protection are exhausted?	Policy 7.4.2.1 d) in the January 25, 2013 LCP is meant to convey that options for improvement to the System are greater when working at the higher levels of the planning process. In the revised draft of the LCP, this policy has been moved into a bulleted list of provisions for compensation (including using it only as a last resort) in policy 7.4.2.1 d).	N
Durham Region (Works Dept.)	7.4.2.1	(c) Need further explanation and understanding of Compensation.	Comment noted and some modifications have been made to the text box and policies on compensation to provide further clarification.	N
Durham Region (Works Dept.)	7.4.2.1	(d) regarding the compensation...take place at the appropriate level of the planning and development process...could the definition for the "appropriate level" be more specific?	Examples are provided in the policy.	N
City of Markham	7.4.2.1	(a) This policy deals with reduction in buffer width under specific conditions. Markham supports this TRCA policy which allows a reduction in buffer width for redevelopment subject to certain TRCA conditions.	Comment noted.	N
City of Markham	7.4.2.1	(d) This policy deals with the timing of compensation requests in "appropriate level of the planning and development process.." Staff suggest that this should specifically state at the time of Pre-consultation for an application.	Given that compensation is a "last resort", it should not be considered an option at pre-consultation.	N
Ministry of Municipal Affairs and Housing	7.4.2.1	pg 75 - Look at river valley language in Greenbelt Plan (re: < 10 metres)	Policy 7.4.2.1 a) has been modified to address these points.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.4.2.1	(c) This policy directs natural heritage compensation in accordance with the TRCA's Compensation Protocol. We understand that this document has not yet been prepared. Markham currently addresses compensation matters in accordance with our own protocols (currently Trees for Tomorrow). This policy should be clarified to address compensation in accordance to TRCA with either municipal standards.	Policy 7.4.2.1 d) provisions for compensation include protection from municipal requirements and consultation with the municipality.	N
Niagara Escarpment Commission	7.4.2.1	<p>Compensation for the loss of natural features and functions is not an approach that is supported by the NEP. Within the NEPA, the NEP objectives and policies are applied when assessing potential impacts of proposed development, including potential loss of, or negative impacts to natural features and their functions. The NEP requires maintenance and protection, enhancement and minimizing of impacts. Mitigation may be used in certain site specific cases where impacts are determined not to be negative (i.e. visual buffers), and only when all applicable Development Criteria have been met.</p> <p>Therefore, we propose the following modification to policy 7.4.2.1(c) to clearly identify that proposed development within the NEPA should be not assessed using a compensation approach:</p> <p><i>To recommend that when development or infrastructure cannot protect a natural feature, or part of a natural feature, (and the feature is not protected by any other applicable federal, provincial (e.g. Niagara Escarpment Plan), or municipal requirement(s)), compensation be provided in consultation with the municipality(ies) and in accordance with TRCA's Compensation Protocol.</i></p> <p>NEC staff also recommends that this distinction be made in the discussion provided in Section 7.4.2 that precedes the list of policies.</p>	<p>The term "provincial requirements" in 7.4.2.1 c) captures all provincial plans, policies and standards.</p> <p>The preamble in 7.4.2 has been modified to be more specific about provincial requirements and the application of the Protocol.</p>	Y

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Peel Region	7.4.2.1	<p>(c) references the option of compensation. In principle, Regional staff supports the concept of compensation in limited situations where it is appropriate and where it is not necessary that a natural feature or portion of a feature be protected. In general, the policy should typically only apply to features or portions of features that are deemed not to be significant in accordance with municipal/provincial policy. In these situations, replacement and enhancement may be appropriate to consider for the purpose of protecting natural system function. It is recommended that the compensation policy clearly outline the principle of net gain to ensure protection of natural system function when existing features are removed or reduced. In these circumstances, one to one replacement is less certain and desirable than outright protection and when compensation is appropriate the policy should emphasize a net gain approach. The definition of "compensation" in the glossary does not currently reflect the concept of net gain approach and should be revised and/or the policy clarified to make this intent clearer. Regional staff also suggest that monetary compensation not be encouraged and when appropriate that it only be considered if accompanied by a site specific restoration and enhancement plan and agreement to replace the habitat prior to removal within a defined timeframe.</p> <p>It is also noted that Regional staff has not been consulted on TRCA's Compensation Protocol and may provide additional comments on the appropriateness of this policy with details of the protocol are available.</p>	Thank you for these comments which are valuable to consider in the development of the Compensation Protocol. They are noted and will be passed along to staff leading that project. Some of them are captured in the text box in 7.4.2 of the LCP, on what to consider if compensation is required. And some are captured in the modified policies on compensation (see 7.4.2.1 c) and d)).	N
Peel Region	7.4.2.1	(i) There is reference in this section to policy 7.4.2 (f) which is an incorrect reference.	The reference has been corrected.	Y

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City of Pickering	7.4.2.1	<p>Section 7.4.2 appears to be premature in that, at least at the time of writing the Living City Policies, TRCA's Compensation Protocol had not been approved. It is accordingly pre-mature to incorporate it into the policy document.</p> <p>In addition, similarly to earlier comments, although section 7 is supposed to relate to natural heritage matters that fall under the Planning Act, which assigns decision making authority to municipalities, paragraph 1 suggest that TRCA makes the decisions in consultation with the municipality. This should be corrected. The municipality, in consultation with TRCA, has authority to determine such matters.</p>	<p>Except for the text box that explains the Protocol is in draft and will be consulted on, reference to it has been removed. The compensation policies remain as recommendations to approval authorities on applications circulated for TRCA's comments. Some wording has been added to paragraph 1 of 7.4.2 to highlight that the municipality is the decision maker.</p>	Y
City of Vaughan	7.4.2.1	(a) We appreciate the reference to municipal requirements in this policy.	Comment noted.	N
City of Vaughan	7.4.2.1	(b) Consider including a reference to "municipal standards and/or guidelines for EIS submissions" in the second part of policy 7.4.2.1 (b).	The policy has been modified to incorporate municipal requirements.	Y
Durham Region	7.4.3.1	(a) It is suggested that to improve the readability of the document, Policy 7.4.3.1 a) x) be included as a separate policy.	x) has been deleted from the policy and incorporated into the last bullet in the objectives for this section.	Y
Town of Richmond Hill	7.4.3.1	We are concerned that the policies of section 7.4.2.1 set out onerous requirements associated with modifications to hazardous lands to facilitate the construction of trails. While policy 7.4.2.1 (e) recognizes that "passive or low intensity outdoor recreation and education, conservation or restoration projects" must locate within hazardous lands, it also seems to establish requirements for "environmental assessment, comprehensive environmental study or technical reports" in association with these projects. We suggest that the requirements should be tied to the scale of trail projects.	As per current practice, technical reports are scoped based on project scale in accordance with Provincial, municipal and TRCA standards and guidelines.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.4.3.1	Include additional flood risks such as mould and water contamination.	These have been added to Section 6.2 as potential impacts of climate change associated with flooding.	Y
City of Markham	7.4.3.2.1	(c) This policy directs update and reviews of Flood Emergency Response Plans. Markham updates and reviews all our emergency procedures regularly and in accordance with Provincial legislation. We take direction from the Province on this matter.	Comment noted.	N
City of Vaughan	7.4.3.2.1	We appreciate the reference to municipal-wide Emergency Plans, rather than just a flood emergency response plan, in s. 7.4.3.2.1.	Comment noted.	N
City of Brampton	7.4.3.2.2	(b) and (c) these policies for the One Zone Policy Area include reference to the floodway; however, the One Zone Concept figure does not indicate a floodway. Should this figure not be revised to illustrate the floodway.	This figure is an image from an MNR publication. In a One Zone, the entire flood plain is considered to be the floodway (refer to the LCP Glossary definition or the PPS definition).	N
Town of Caledon	7.4.3.2.2	These policies do not address issues of non-hazard related reconstruction of existing development located in the identified flood hazard area or cross reference Section 8.5.1.4 conditions.	The words "reconstruction/replacements" have been added to policy 7.4.3.2.2 c) to capture these instances. The policy already references the Section 8 policies.	Y
York Region (Long Range Planning, Public Health, ES)	7.4.3.2.2	(c) Please review the wording of this policy as the intent of the policy is unclear. If it is the intent of the policy to conditionally permit development and site alteration – recommend bringing that descriptor (which by their nature must locate) to immediately follow "development and site alteration". In doing so, further grammatical modifications are required.	This wording is from the PPS, section 3.1.3.	N
Central Lake Ontario Conservation	7.4.3.2.2	There is inconsistency in One and Two Zone policies. As it stands the policies for One Zone are more lenient than Two Zone policies. Consider adding policy 7.4.3.2.2 c) to Two Zone Policy Areas section. Similarly with section 8.5.1.1.	We have amended the Two Zone policy 7.4.3.2.3 e) to address this comment.	Y
Town of Caledon	7.4.3.2.3	These policies do not address issues of non-hazard related reconstruction of existing development located in the identified flood hazard area or cross reference Section 8.5.1.4 conditions.	Development in a Two Zone is governed by the approved official plan policies for the Two Zone.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Central Lake Ontario Conservation	7.4.3.2.3	There is inconsistency in One and Two Zone policies. As it stands the policies for One Zone are more lenient than Two Zone policies. Consider adding policy 7.4.3.2.2 c) to Two Zone Policy Areas section. Similarly with section 8.5.1.1.	We have amended the Two Zone policy 7.4.3.2.3 e) to address this comment.	Y
Etobicoke-Mimico Watersheds Council	7.4.3.2.3	(g) Where is the pressure coming from to create Two Zone policy? Given the increased risk of flooding due to climate change why would TRCA want to take on this additional liability? Also seems to contravene other land use policies favouring natural reserve. Rather than create a new generalized policy, why not expand scope of special policy area?	Two zones are a flood plain management approach identified in the PPS available to manage risk. The explanation of the Two Zone Concept in Section 7.4.3.2 states that the concept is only considered where TRCA in cooperation with the municipality and the Province, after considering local circumstances, agrees that the concept is suitable.	N
Town of Ajax	7.4.3.2.4	a) Should be revised to indicate that a Special Policy Area is not intended to allow for new or intensified development and site alteration, if a community has feasible opportunities outside the flood plain, consistent with the PPS. There may be instances where no feasible opportunities exist outside the flood plain.	Wording has been incorporated.	Y
City of Brampton	7.4.3.2.4	Staff is still reviewing Sec. 7.4.3.2.4 and will provide comments shortly.	Comment noted.	N
Durham Region	7.4.3.2.4	It appears that Policy 7.4.3.2.4 a) conflicts with Policies 7.4.3.2.4 d) and f) in regards to new or intensified development in a Special Policy Area. It is suggested that Policy 7.4.3.2.4 a) be clarified by adding the wording used in the PPS " ... if a community has feasible opportunities for development outside the flood plain."	Wording has been incorporated.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.4.3.2.4	This policy identifies the requirements for Special Policy Areas which allows development on certain flood prone lands but ties the policies to the Section 7.3.1 which tends to prohibit development in the natural system (including flood plain lands). This creates a policy conflict and should be corrected. Staff feel that there is an opportunity to clarify the ongoing confusion regarding SPA development. For example, "a SPA is not intended to allow for new or intensified development and site alteration". What is considered "new" development? What does "intensified" actually mean? Could the TRCA also define the term "Intensified Development".	The policies in 7.3.1 contains exceptions to the recommended prohibitions, in recognition of areas like SPAs. The wording in 7.4.3.2.4 about an SPA not being intended for new or intensified development is from the PPS; the PPS does not define these terms.	Y
Etobicoke-Mimico Watersheds Council	7.4.3.2.5	(a) This whole section seems to be at odds with natural systems protection under 7.3.1.2 and section 7.5.2.6.	Comment unclear.	N
Central Lake Ontario Conservation	7.4.3.2.5	7.4.3.2.5 (b) ii) and 8.5.1.10 (c) Permanent remediation in spill areas is definitely the best route to take. However, why is floodproofing generally discouraged in spill areas? It seems that if complete remediation of the site is not feasible then floodproofing must be available as the second option given that it can be demonstrated that there will be no upstream and downstream impacts.	The phrase "shall be discouraged" has been removed from policy 7.4.3.2.5 b) ii) to improve clarity.	Y
City of Brampton	7.4.3.3	Please qualify how a "confined system" that is associated with a river or stream, may not contain a watercourse?	The river or stream could have existed historically. This wording is from TRCA's Section 28 Regulation.	N
City of Markham	7.4.3.3	Unconfined System Figure (p 82) - Please verify the figure; meander belt allowance is not shown in the figure.	The correct graphic for Unconfined System will be in place in the final version of the LCP.	Y
City of Markham	7.4.3.3	The diagrams for "Confined System A" and "Unconfined System" appear to be the same. Please amend.	The correct graphic for Unconfined System will be in place in the final version of the LCP.	Y
City of Vaughan	7.4.3.3	The graphic for an unconfined system (p. 82) appears to be the same as for a confined system.	The correct graphic for Unconfined System will be in place in the final version of the LCP.	Y

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City of Toronto (Planning 2)	7.4.3.5	In addition to the specific types of sites that TRCA has identified, the City suggests adding: <ul style="list-style-type: none"> • Steep slopes along former shoreline features of Lake Iroquois; • Poorly and/or illegally placed fill; • Oversteep slopes; and, • Retaining walls. 	Hazardous sites are defined by the Province. However, your suggestions may be captured under the erosion hazard in valley and stream corridors.	N
York Region (Long Range Planning)	7.4.4	We request further clarification on the terms "cumulative" and "compensation". In particular, York Region is looking for guidance on how these policies would relate to/and or impact infrastructure projects that are conducted under a Municipal Environmental Assessment. It is our understanding that TRCA's Compensation Protocol remains under development and a draft will be released for stakeholder consultation shortly. York Region welcomes the opportunity to continue to provide input as the compensation strategy develops.	Comment noted. York Region will be included in the consultation on the Protocol.	N
Town of Ajax	7.4.4	Goal and Objectives: Avoidance should be highlighted as a first principle and identified separately consistent with the introductory text.	Avoidance comes first in the goal. Also, it is identified separately as a policy i.e., policy 7.4.4.1 (b).	N
City of Markham	7.4.4	This section deals with how infrastructure will compensate for impacts to the Natural System. The policies need to be more descriptive on how compensation is to be interpreted and implemented.	The policies on compensation have been modified to remove reference to the Compensation Protocol given that it is still under development. In the absence of the Protocol, the policies reflect current practice.	N
Town of Ajax	7.4.4.1	c) Policy should be revised as follows: That generally only under limited conditions where avoidance is neither possible nor feasible , linear infrastructure cross perpendicular to the Natural System and at its most narrow point.	The word "generally" is needed to provide flexibility given that, at times, a valley's most narrow point may not be the ideal crossing location from a natural systems perspective.	N
Town of Ajax	7.4.4.1	j) "Utilidors" should be defined.	This term has been changed to co-location of utilities, to improve clarity.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.4.1	<ul style="list-style-type: none"> (c) This policy needs to recognize some flexibility wherein the overall alignment of infrastructure may not coincide with the narrowest point of the Natural System. (m) It would be more appropriate to speak to "no net loss and a net gain" in natural features and functions, rather than "improvement", "enhancement", etc. 	<ul style="list-style-type: none"> The word "generally" in policy c) provides flexibility. Issues such as this will be addressed through the consultation on TRCA's draft Compensation Protocol currently underway. 	N
Durham Region	7.4.4.1	<p>(a) The intent of Policy 7.4.4.1 a) appears to be twofold: to address the need to coordinate the various planning processes; and to address cumulative impacts. It is suggested that to improve the readability of the document, the policy be split into two.</p> <p>It is also suggested that the wording be changed from "avoid cumulative impacts" to "consideration of cumulative impacts". This is consistent with terminology used elsewhere in the document.</p>	The two issues are connected given that not coordinating multiple projects in the same reach may result in cumulative impacts.	N
Durham Region (Works Dept.)	7.4.4.1	(c) (l) (m) (n) (o) Need further explanation and discussion.	Comment unclear.	N
Don Watershed Regeneration Council	7.4.4.1	(k) Utilidor definition = above ground network for water and electricity in areas of permafrost. Need another term.	The term has been removed in favour of "co-location of utilities" in order to avoid confusion.	Y
King Township	7.4.4.1	It is understood that this Document introduces new areas for development review (ex. stream crossings, stormwater management technical standards). It would be beneficial to have a discussion about these new areas of review, and how they impact planning, building, and engineering and public works processes, and design criteria.	The LCP is largely reflective of current practice, i.e., TRCA reviews applications circulated for comment related to its interests, including stream crossings, stormwater management, and corresponding technical standards.	N
Ministry of Natural Resources	7.4.4.1	(c) You may wish to add "or an area that would have the least impact on natural features of the Natural System".	The policy has been modified accordingly.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Vaughan	7.4.4.1	Telecommunications is included in the definition of infrastructure. Does this include cell towers and is it the intent that the general infrastructure policies of section 7.4.4.1 apply to cell towers, including compensation provisions?	Yes, recognizing that such comments would be provided (if circulated), as part of any stakeholder consultation since telecommunication towers are exempt from provincial legislation.	N
City of Vaughan	7.4.4.1	(a) York Region policies regarding infrastructure and the Greenlands System may be stronger than expressed in this policy with respect to enhancements to the Natural System.	The policies do not preclude more restrictive policies of the approval authority being applied.	N
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	<p>The terms "cumulative impacts" and "cumulative effects" appear to be used interchangeably in the document; however, only "cumulative impacts" is defined in the glossary. Please use one term or define cumulative effects.</p> <p>Various policies in the Living City document speak to the need to assess or consider "cumulative impacts"; however, only a very brief and uninformative description is provided in the glossary. To date, there has been limited consideration for cumulative impacts to the natural environment associated with infrastructure projects. The definition in the glossary should be elaborated on to provide additional context (e.g. what is the scale and scope of cumulative impact assessment).</p>	<p>The term, cumulative effects, was used only in the Regulation chapter but has now been replaced with cumulative impacts.</p> <p>The definition of cumulative impacts has been modified to be more specific to scale.</p>	Y
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	(a) Should be an "encourage" policy as these processes are led by others.	The policy has been modified to emphasize that it is a recommendation.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	(c) States "That generally, linear infrastructure cross perpendicular to the Natural System and at its most narrow point". This is often not possible as the location of crossing the natural system is dependent on existing rights of way, easements or location of the existing linear infrastructure system. During design, consideration is given to the natural system and methodologies are developed to minimize impacts, mitigate and where necessary restore.	The policy contains the term "generally" so as not be inflexible in this regard.	N
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	(k) Avoid jargon such as "utilador". Policy could be rephrased to encourage/promote the co-location of utilities or common utility corridors, where appropriate, to minimize disruption of natural areas.	Policy k) has been modified accordingly.	Y
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	(l) States "To recommend that when infrastructure cannot protect a natural feature, or part of a natural feature, (and the feature is not protected by any other applicable federal, provincial, or municipal requirement(s), compensation be provided in consultation with the municipality(ies) and in accordance with TRCA's Compensation Protocol". The document further notes that the Compensation Protocol is still being finalized in draft and is scheduled to be released for stakeholder consultation in early 2013. In order to comment on this policy, additional details are required on the Compensation Protocol. York Region will be required to ensure that consultant assignments and contracts have appropriate provisions for consideration on compensation planning and associated work. The types of habitats the compensation protocol applies to and the ratio of compensation for impacted features should be outlined to provide clarity.	Comment noted. Stakeholder consultation on the Protocol is currently underway.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Environmental Defence	7.4.4.1	<p>Policies pertaining to pipelines should be separate from other infrastructure. Pipelines pose a unique risk that other above and underground infrastructure generally does not. Whereas railcars or trucks transporting hazardous liquid material may have incidents where some or all of their contents are spilled into the natural system, this represents a finite quantity of pollutant. Pipelines may spill for a prolonged period of time and contaminate or otherwise pollute the natural system Irrevocably. As such, the proposed policies outlined in 7.4.4.1 and its subsections do not sufficiently address the unique risks pipelines present.</p> <p>For example, the proposed reversal and expansion of Line 9B to carry tarsands bitumen from Sarnia across the entire province to Quebec and beyond presents a contribution to the causes of climate change as well as a significant increased risk to the watersheds under TRCA stewardship. The proponent of this project has already demonstrated the high risk hazardous material transportation infrastructure presents in other jurisdictions, as well as the high cost. Their pipeline ruptured in the Kalamazoo River and caused irreparable harm to the surrounding ecosystem and seriously compromised human health. This plan to transport tarsands bitumen through the watersheds within TRCA jurisdiction by under-monitored pipelines will pose an unacceptable threat to residents' health, drinking water and the ecosystems services the urban region depends on. The risks presented by pipelines require a specific set of policies to govern how they are sited, managed and monitored to mitigate the potential impact of their construction and operation to human and ecosystem health.</p>	<p>Policy 7.4.4.1 i) addresses contingency plans for emergencies during construction that can occur with many types of underground infrastructure. We have broadened the policy slightly to capture other components of the Natural System and emergency situations during operation as well as during construction.</p>	

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	7.4.4.1	(l) The text in parenthesis should be deleted.	The policy could apply to infrastructure that does not fall under an environmental assessment process so the text in parentheses should remain.	N
City of Markham	7.4.4.1	(k) Markham does not use the term "utilidors". Perhaps this could be phrased differently or defined.	The term has been removed in favour of "co-location of utilities" in order to avoid confusion.	Y
Town of Whitchurch-Stouffville	7.4.4.1	Policies recommend that when infrastructure cannot protect a natural feature, or part of a natural features and the feature is not protect by any other applicable federal, provincial, or municipal requirements(s) compensation be provided in consultation with the municipalities and in accordance with TRCA's Compensation Protocol. The document further indicates that the compensation Protocol is still being drafted and is to be released for comment. Until this protocol is better understood it should not be implemented into policy.	The policies on compensation have been amended to remove reference to the Compensation Protocol given that it is still under development. In the absence of the Protocol, the policies reflect current practice.	Y
York Region (Long Range Planning, Public Health, ES)	7.4.4.1.1	In general, capital projects are conducted in accordance with the policies listed.	Comment noted.	N
Durham Region (Works Dept.)	7.4.4.1.2	(c) May not be feasible or practical.	The policy has been modified to be clear that both the new section of road and the existing section of road meet all of the SWM Criteria. This is reflective of current practice where treating roads for SWM has been shown to be feasible, even with land constraints, through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Durham Region (Works Dept.)	7.4.4.1.2	(c) Are there parameters to work with for example minimum area of road widening before it is determined that the new section of road be treated for water quality?	The policy has been modified to be clear that both the new section of road and the existing section of road meet all of the SWM Criteria. This is reflective of current practice where treating roads for SWM has been shown to be feasible, even with land constraints, through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	Y
City of Markham	7.4.4.1.2	(c) This policy deals with water quality control for road widenings. We feel there should be some flexibility in this policy (current TRCA requirements applying to both the existing road and the new road) depending on the amount of widening, age of the infrastructure, overall environmental impact, and funding. Clarification is required if quantity, erosion and water balance control for road widening is required in addition to quality control.	The policy has been modified to be clear that both the new section of road and the existing section of road meet all of the SWM Criteria. This is reflective of current practice where treating roads for SWM has been shown to be feasible, even with land constraints, through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	Y
City of Markham	7.4.4.1.2	This section deals with transportation infrastructure policies. We support the use of current TRCA requirements for all new transportation infrastructure crossing valley and stream corridors. We are concerned about applying current TRCA requirements on replacement and upgrades. We will require further clarification on how these policies are to be interpreted.	These issues will be discussed through consultation on TRCA's draft stream crossing guidelines.	N
City of Markham	7.4.4.1.2	(a) This policy indicates that the location and design of transportation infrastructure crossing valley and stream corridors, including new, replacements or upgrades have to meet current "standards" and policies. Existing infrastructure should be "grandfathered" in terms of replacements and upgrades. We are concerned that existing culverts and structures may not be allowed to be replaced because they may not meet current TRCA requirements.	The policy reflects current practice and is not prohibiting replacements but is looking for improved conditions, e.g., replacements should not aggravate existing hazards.	N
City of Mississauga	7.4.4.1.2	(c) We understand the criteria and expect that space limitations for implementing solutions in existing areas may be challenging. Suggested that wording be included to reflect this consideration or response to this comment as acknowledgement of this fact.	This is reflective of current practice where treating roads for SWM has been shown to be feasible through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Richmond Hill	7.4.4.1.2	Do the Transportation Infrastructure Policies of section 7.4.4.1.2 apply to private driveways?	If the driveway were part of a <i>Planning Act</i> application circulated to TRCA for comment, yes.	N
York Region (Long Range Planning, Public Health, ES)	7.4.4.1.2	Include trails as an example of transportation infrastructure	This example has been added.	Y
York Region (Long Range Planning, Public Health, ES)	7.4.4.1.2	(c) States "That for road widenings, the surface area of both the existing road and the new road be treated for water quality in addition to meeting the other TRCA stormwater management criteria, in accordance with the policy 7.4.1.1.1 (a) for stormwater management". In many instances, the existing rights of way can be constrained and as such have minimal options for enhanced stormwater treatment. Additional land, if required for stormwater treatment, would have implications on the Region including property acquisition (and possibly expropriation), more stringent environmental assessment requirements, and possibly additional regulatory requirements (e.g. MOE approvals).	This is reflective of current practice where treating roads for SWM has been shown to be feasible, even with land constraints, through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	N
York Region (Long Range Planning, Public Health, ES)	7.4.4.1.2	Request clarification on road widenings i.e. "...the new road be treated for water quality..."? (also cited in section 8.9.6 (d))	Policy has been modified to simplify.	Y
Town of Ajax	7.4.4.1.3	Staff question under what circumstances would a Regional Flood Control Facility be permitted within a valley or stream corridor?	It would be only in those situations where it is deemed acceptable to MNR, the municipality and TRCA.	N
City of Brampton	7.4.4.1.3	(f) Please clarify if a Regional Flood Control Facility is a SWM facility designed to the control the Regional Storm as per (b).	Yes, the two are the same. Policy b) has been modified to use the same term as policy f).	Y
Durham Region (Works Dept.)	7.4.4.1.3	(c) In the design of the location of the SWM facility will a minimum offset from the Regional right of way be determined as this would help address the safety concerns associated with travelling public.	This would be in the purview of the municipality.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Don Watershed Regeneration Council	7.4.4.1.3	(e) (ii) SWM facilities should generally be located outside the regional storm flood plain and only in the flood fringe in a Two Zone Policy Area.	Policies for Two Zone Policy Areas generally do not cover the location of SWM facilities.	N
City of Markham	7.4.4.1.3	(b) This policy, dealing with risk associated with SWM facility failure needs more clarification. Does it mean that the downstream flooding and risk of life, similar to dam break analysis, shall be investigated if the pond fails? Single individual pond failures might have very negligible downstream effect; but a group of ponds failure at a time might have a cumulative, severe downstream impact.	Yes, it deals with public safety, and pond failure is one component of this. Clarification will be provided through supporting technical documents being developed by TRCA's Water Resources staff.	N
City of Markham	7.4.4.1.3	(e)(ii) This policy deals with SWM facility location outside of the Regional flood plain. For consistency with MOE's design guideline, it is Markham policy that the SWM facilities shall be located outside of the 100 yr flood line. Further clarification is required why the SWM facility should be located outside of the Regional floodline.	e) iii) states that SWM facilities be located outside the 100-year. i) states that they be located outside the Regional but includes flexible wording (i.e., "generally be located")	N
Town of Richmond Hill	7.4.4.1.3	(a) states that that the SWM report or equivalent study shall demonstrate how the TRCA SWM Criteria can be met. Depending on the size, location and type of work required to the facility, not all SWMF can meet 'current' criteria. Suggest including when applicable into this policy or something to this regard.	Issues such as this were addressed through the consultation on TRCA's SWM Criteria document. The planning policies are representative of TRCA's commenting role and are therefore recommendations to approval authorities. Wording to this effect has been added to the preamble of Chapter 7 in order to emphasize this.	N
Town of Richmond Hill	7.4.4.1.3	(c) states that the policy of TRCA is to integrate the SWMF into the developing or redeveloping community as attractive amenities for safe, passive use and enjoyment. Although the intent of this part of the policy is good, we feel that this is a decision best made by the municipality. Suggest rewording this policy to state that the TRCA will encourage developers and municipalities to design SWMFs as a community piece.	The planning policies are representative of TRCA's commenting role and are therefore recommendations to approval authorities. Wording to this effect has been added to the preamble of Chapter 7 in order to emphasize this.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Richmond Hill	7.4.4.1.3	(h) Is this policy referring to TRCA owned facilities/reservoirs? Municipal owned SWMFs are required to function according to Environmental Compliance Approvals granted by the MOE. The operation and maintenance of municipally-owned facilities is a municipal responsibility. We suggest that this policy is clarified.	This is not referring to TRCA-owned facilities, but to all public facilities. It is in TRCA's interest that SWM facilities be maintained to provide benefit to the watershed. But the policy has been modified to acknowledge that maintenance is a municipal responsibility.	Y
SCS Consulting Group Ltd.	7.4.4.1.3	(c) SWM facilities are primarily municipal stormwater management infrastructure facilities which provide a specific function to control and treat stormwater runoff and should not be required or encouraged to be integrated as a public amenity. If the facilities are to be designed as public amenity spaces, a different approach should be considered by the municipalities and TRCA with regard to park integration.	The policy states that integration should be subject to safety and appropriateness. The planning policies are all recommendations to approval authorities (e.g., municipalities).	N
City of Toronto (Planning)	7.4.4.1.3	(e) States that SWM ponds "generally be located outside of valley and stream corridors" and "regional storm flood plain". It is not clear what is meant by the term "generally" as it may be interpreted in different ways. As you know, it is sometimes necessary for the City of Toronto to locate SWM ponds in these locations as part of the City's wet weather flow management plan.	The term "generally" applies flexibility to the policy.	N
York Region (Long Range Planning, Public Health, ES)	7.4.4.1.3	(e) It seems that the "must" in this policy is more restrictive than intended when considering the rest of the policies. I recommend replacing "must" with "may be permitted in accordance with an approved MESP".	The wording of policy e) has been modified to say, "...where SWM facilities are permitted to be located within the Natural System.."	Y
Town of Ajax	7.4.5	What type of compensation is being proposed regarding the cumulative impacts of recreational uses, and if it is monetary, who pays and for what purpose?	These issues will be discussed through consultation on TRCA's draft Compensation Protocol.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.5	<ul style="list-style-type: none"> The LCP has defined "major" and "minor" recreational use, whereas many municipalities use "active" and "passive" recreation. You may wish to undertake a quick scan of the watershed municipalities to determine if there is a general preference in these terms found in the respective zoning by-laws. The LCP recognizes the function of, and need for trails and pathways within the NHS. The City of Brampton supports the use of trails within the NHS as a way of providing access to and appreciation of the natural ecosystems. 	<ul style="list-style-type: none"> The LCP is concerned with the amount of modification to the terrain needed to facilitate a recreational use and therefore, major and minor definitions are more appropriate than active and passive, which deal more with a description of the recreational activity than alterations required to the landscape. Comment noted. 	N
City of Brampton	7.4.5	<ul style="list-style-type: none"> Goal: The wording should be revised to indicate "That the siting design and operation of new recreation" since the presumption is this refers to new development, as opposed to existing recreation. Objectives: <ul style="list-style-type: none"> <u>Bullet 1</u>: for explanation is required to understand the implications of this objective as well as Sec. 7.4.5.1 (iv). <u>Bullet 2</u>: The word "appropriate" is used to describe "public uses". The definition for Minor Recreation Uses states that this "includes, but is not limited to: trails for walking and cycling ...picnic facilities, natural heritage appreciation." We would ask that the "uses" also recognize the need to access trails and other facilities for general maintenance and repair from time to time in order to maintain them for safe use by the public. 	<ul style="list-style-type: none"> Expansions, repairs and upgrades of existing recreational use can also help to realize this goal through the siting, design and operation of the alterations. An example of these strategies (objective) and consideration for cumulative impact (policy) would be to avoid multiple major recreational uses within the same corridor reach. The definition of minor recreational use contains wording on BMPs for maintenance (see sidebar and glossary). 	N
Cycle Toronto Ward Groups	7.4.5	Objectives: Yes, by bringing stakeholders in a collaborative dialogue, we can build better infrastructure and reduce conflicts and misunderstandings between stakeholder groups.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Cycle Toronto Ward Groups	7.4.5	Minor Recreational Uses: Yes, recreational uses such as golf courses or ski hills occupy large areas of land, and are far more disruptive than trails, which can be designed to have a negligible impact on the natural environment. This is an important distinction to make. Many trail projects have been challenged as an artificial intrusion on a natural space; this is often overblown in comparison to other more accepted human interventions, such as roadways, pipelines, train and hydro lines. It should also be noted that rows of residences often line the crests of ravines in Toronto. Many have decks, back yards and pools that detract from the natural environment of the parkland that they sit above. Residential interventions bordering ravines can in fact be far more obtrusive than the narrow trails that are located at lower elevations.	Comment noted.	N
Cycle Toronto Ward Groups	7.4.5	(i) Long trails without connections and access points to the nearby communities are not only of limited use to those same communities, but can also engender resentment towards the trails if trail users are seen as “outsiders”. A lack of access points has a negative impact on safety, providing fewer locations for emergency access, a longer distance to exit points, and a lower probability of trail surveillance due to fewer trail users.	Comment noted.	N
Peel Region	7.4.5	Recreational Use - The agricultural sector in TRCA's jurisdiction is diversified to include primary production and a value-added chain. The sector benefits public health and nutrition, environmental management and conservation. Agriculture, which includes primary production, urban agriculture and value-added opportunities (e.g., agri-tourism), should be given recognition in the document as a sector that, as a whole, contribute to a sustainable community.	Agriculture's importance to sustainable communities is indicated through section 6.6 and policy 7.2.1 d).	N
Cycle Toronto Ward Groups	7.4.5	Overall we are happy to see so much strong language around cycling, active transportation and trails in the draft document.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	7.4.5.1	a) iii) It is unclear what the TRCA interest is in the development of this policy.	a) iii) This refers to compatible employment opportunities such as agri-tourism and eco-tourism type businesses.	N
Town of Ajax	7.4.5.1	d) It is unclear by the policy if whether beaches or other water-based recreational uses would be considered a major recreational use that is not permitted in the Natural System.	The definition of major recreational use should provide guidance to indicate if a use would be recommended to be permitted within the Natural System.	N
City of Toronto (Planning 2)	7.4.5.1	<p>To address TRCA's diverse jurisdiction, the LCP policies are intended to be broad and provide flexibility where appropriate but do not always align and may conflict with municipal OP policies. For example:</p> <p>(b) Recommends that lands within the Natural System not be considered for municipal parkland dedication which may include a larger area than the Toronto OP policy 3.4.6 which requires that land below top of bank or other hazards lands not be used to calculate permissible density in the zoning bylaw or satisfy parkland dedication requirements;</p> <p>(d) Recommends that major recreational uses not be permitted in the Natural System, except as permitted by provincial plans. This is different from Toronto OP policies and Zoning bylaw which allow some major recreational uses in the City's natural heritage system.</p> <p>Given these different contexts, it is important that:</p> <ul style="list-style-type: none"> • there are no conflicts between LCP policies and municipal OP policies; • stakeholders understand that LCP policies will be interpreted in the context of municipal policies; • TRCA and municipal staff provide consistent messaging to applicants; • the policies are interpreted and applied in a consistent manner. 	<ul style="list-style-type: none"> • The planning policies of chapter 7 are recommendations to approval authorities; more wording has been added to the preamble in chapter 7 to emphasize this. • Other comments noted. 	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.5.1	<ul style="list-style-type: none"> • (a)(i) The City would stress the need for public access to the open space system, and ask that you revise the wording as follows "A coordinated network of landscape and nature-based publically accessible recreation areas". • (a)(iii) Please qualify why the LCP includes a policy regarding employment in policies for recreational use? • (e) It would be beneficial to provide examples of what constitutes a "minor expansion" of major recreational uses? 	<ul style="list-style-type: none"> • (a)(i) The policy has been modified accordingly. • (a)(iii) This refers to compatible employment opportunities such agri-tourism and eco-tourism type businesses. • (e) Minor expansion is a defined term in the glossary and is also defined in the box in 7.4.5.1. 	Y
Durham Region	7.4.5.1	Policies 7.4.5.1 g) iii) and 7.4.5.1 g) vi) are repetitive. It is suggested that the policies be revised to remove the repetition.	These two policies are sufficiently different so as not to duplicate one another.	N
Peel Region	7.4.5.1	(g) (ii) This policy indicates that a Environmental Farm Plan will be required for agri-tourism businesses on TRCA owned lands. The EFP program guidelines should be reviewed to ensure that this policy meets EFP program criteria and eligibility. Clarification is also requested to why this policy has been limited to TRCA lands with agri-tourism activity and not applied to all of TRCA's agricultural owned lands.	A policy has been added to section 6.6 (Near Urban Agriculture) that references EFPs for all TRCA-owned lands. Policy 7.4.5.1 refers to agri-tourism activity specifically because it is in the Recreational Use section.	Y
City of Toronto (Planning)	7.4.5.1	(d) States "That major recreational uses not be permitted in the Natural System, except as permitted by provincial plans." How does this policy apply where major recreational uses are allowed by existing Official Plans?	The policy applies as a recommendation to approval authorities.	N
Etobicoke-Mimico Watersheds Council	7.4.6	Include the expansion to existing structures or building new structures on conservation lands? Within the TRCA comprehensive management plan what determines the viability of such projects. What criteria within your cost.	Comment outside the scope of the document and would rest with TRCA's project-specific operational procedures and business planning.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Brampton	7.4.6	<ul style="list-style-type: none"> • The description of Conservation Projects introduces a new term "low intensity recreation activities". What does this mean? (p. 92) • (a) Conservation lands are designated and zoned in municipal planning documents in recognition of the lands they occupy, particularly where they are part of the Natural System and/or environmentally hazardous areas. The municipality must first review and consider activities, buildings and structures on conservation lands related to applicable OP policies and the Comprehensive Zoning Bylaw, regardless that the CA may deem it a "conservation-related accessory use". • (b) In addition to an internal TRCA process, this policy should recognize that the TRCA will have to comply with municipal requirements under the Planning Act as appropriate, i.e. Sec. 41 site plan control. 	<ul style="list-style-type: none"> • Examples of low intensity recreational activities are provided in the definition of minor recreational use • (a) All of the planning policies are recommendations to approval authorities. • (b) "municipal requirements" has been added to the policy to address this. 	Y
Niagara Escarpment Commission	7.4.6	<p>Under the NEP, any agency who owns/manages land within NEPOSS is required to develop a management plan that aligns with the objectives and policies of the NEP. Part 3 of the NEP includes policies specific to NEPOSS. To provide additional guidance on how to develop a management plan, the MNR recently finalized a NEPOSS Planning Manual (March 2012) in consultation with the NEC and other stakeholder agencies. Staff recommends the use of this manual by partner agencies. The TRCA currently owns and manages three parks within NEPOSS (i.e. Glen Haffy Conservation Area, Mono Mills Lowlands, Humber Valley). Therefore, NEC staff request that the requirement to prepare management plans, in consultation with the NEC and MNR, in accordance with the policies and objectives of NEPOSS for these lands be clearly identified in the Living City policies.</p>	Policy 7.4.6 b) has been modified to adhere to any provincial requirements.	Y
Durham Region	7.5	This section would benefit from additional background information preceding the various policy sections.	Some wording has been added to comprise a preamble for Official Plans and MESP's.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Durham Region	7.5.2	Policy 7.5.2 i) states that the TRCA's comments regarding the sustainable communities policies will reflect it's [sic] advocacy role. As noted in our above comments, the ROP includes policies regarding healthy and sustainable communities. The Region appreciates any comments that: will assist the implementation of the ROP policies, however the ROP policies are paramount.	Comment noted.	N
City of Vaughan	7.5.2	(j) The City is undertaking a Natural Heritage Network Study in consultation with TRCA to help to ascertain baseline conditions to implement the policy direction of this section. However, there are questions on how staff will work with TRCA to update conditions over the long-term. To implement the direction it would be helpful to know what TRCA data can be made available. Also, there may be additional policy direction required in this document related to data transfer and data agreements for information including sharing and transfer of databases and GIS layers.	These are operational issues that are outside of the scope of the policy document. At present, TRCA works collaboratively with municipalities in the exchange of data.	N
Don Watershed Regeneration Council	7.5.2	(k) Avoid, mitigate, compensate – order of importance.	Comment unclear.	N
Etobicoke-Mimico Watersheds Council	7.5.2	(p) This sounds negative and insular. Add that TRCA staff should be encouraged to appear as expert delegates on environmental planning and protection.	This policy is based on direction from our board and reflects current practice.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	7.5.2.2	<p>b) Policy should specify the minimum content of watershed/sub-watershed plans, their intended purpose and intent to compare pre-and post development flows, water balance, ecology, urban heat island and related effects so that pre and post conditions match.</p> <p>The policy should also be strengthened to require the completion or update of watershed or subwatershed plans prior to the approval of official plan amendments to expand a municipal urban boundary.</p>	<p>The content of an sub/watershed plan is outside the scope of the policy document; the content is typically determined through the development of a terms of reference in consultation with the municipality and TRCA.</p> <p>TRCA does not have the authority to make this policy mandatory.</p>	N
Town of Ajax	7.5.2.2	c) This policy should be clarified to ensure that lands containing the Natural System are over and above municipal public parkland dedication requirements (i.e. the term <i>development</i> would also include parks).	Policy 7.4.5.1 b) captures this recommendation.	N
City of Markham	7.5.2.2	(b) This policy on watershed plans is a duplicate of policy 7.2.1 (d). Staff comments on policy 7.2.1 (d) apply.	7.2.4 d) 7.5.2.2 b) are similar and so we have consolidated 7.5.2.2 a) and b) to avoid duplication. See response to Markham's comment on 7.2.1 d).	N
City of Markham	7.5.2.2	(c) This policy directs that TRCA Natural System not form part of areas to be designated for development. The comments in section 7.3.1 apply. The City will use its Greenway System and Natural Heritage Network in the Official Plan to delineate lands to be protected.	Comment noted. This is the intent of policy 7.3.1 e) i).	N
Ministry of Natural Resources	7.5.2.2	(c) It is not understood what "(except as permitted under provincial plans)" means. Is this actually supposed to say "except as prohibited under provincial plans"?	Policy wording is as intended since the Greenbelt Plan permits some uses in the Natural System.	N
Peel Region	7.5.2.2	(b) It is recommended that watershed or subwatershed plans be completed or updated prior to the approval of OP amendments to expand urban boundaries. It is assumed that the provision would to a great extent place the onus on the TRCA to provide that plan or update to the municipality in order for them to comply with the recommendation.	Not necessarily - the municipality may choose a consultant to do this work with TRCA as a review agency. The decision to undertake a watershed or subwatershed plan and establishing the resources to do would be done in consultation with the municipality.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Pickering	7.5.2.2	References in proposed Policies 7.5.2.2 (c) and 7.5.2.4 (a) to potential natural cover should be revised to reflect the earlier comments.	See responses to previous Pickering comments on this topic.	N
City of Vaughan	7.5.2.2	(b) Staff would appreciate clarification on when watershed or subwatershed studies will be required associated with urban boundary expansions. Watershed studies have been completed for most of Vaughan but subwatershed studies have not been completed as yet for portions of watershed subject to recently approved boundary expansions. Is TRCA's position that a subwatershed study must be completed prior to an urban boundary expansion and or is it sufficient for the subwatershed study to be prepared concurrent with preparation of a secondary plan if a watershed study has previously been completed? Additional clarification would inform the City's approach with respect to proposals to expand the urban boundary and to initiate work on the New Communities designations that were recently ROP approvals in Vaughan.	They are recommended to be done prior to the municipality's approval of the urban boundary expansion based on TRCA board direction, recognizing that the municipality is the approval authority. This is also consistent with provincial direction given that the 2014 PPS, Section 1.1.3.8 states: "In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety." Please note that 7.5.2.2 a) and b) have now been combined since they are similar. Policy 7.2.4 d) also remains as stating that watershed and/or subwatershed studies should be done/updated for urban expansion.	N
Town of Ajax	7.5.2.3	Policies b) and c) should be requirements and not simply recommendations.	TRCA does not have authority to make this policy mandatory.	N
Don Watershed Regeneration Council	7.5.2.3	MESPs should be required for all major development and redevelopment. TRCA should be reviewing all development applications through the "sustainability" lens not just providing additional comments.	The requirement for an MESP is based on the official plan policies of a municipality. Policy 7.5.2 i) of The LCP captures the review of applications with sustainable communities policies from Chapter 6.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Vaughan	7.5.2.3	<p>This policy does not define what Block Plans are. They may vary by municipality, but generally they can be considered to be a non-statutory implementation tool identified in the Official Plan, which is submitted by a development group for Council approval, which is used to coordinate the development of large scale, multi-owner parcels to inform the submission and approval of the implementing draft plans of subdivision and zoning amendments in accordance with the policies of the municipality.</p> <p>Conveying an understanding of the role of the Block Plan process will be important for readers, but it would probably be inappropriate to define the term in that specifics might vary from municipality to municipality. However, if discussed and description should include "where provided for by a municipality and in accordance with any such policies."</p>	<p>The terms Block Plan and MESP are used interchangeably in recognition of terminology varying from municipality to municipality. However, to avoid confusion we have removed the term Block Plan.</p>	Y
City of Vaughan	7.5.2.3	<p>(b) presents policies that are contrary to City practice. As written, it appears to assume that the City has the responsibility of preparing the Terms of Reference for the MESP. They are submitted by the Block Plan Group for the approval of the City in consultation with affected agencies. In (b) there is often a gap of many years between the "conditional" approval of a secondary plan and the submission of a Block Plan application by the ownership group. This may be due to timing of Council adoption, appeals, hearings, market conditions, servicing constraints or problems with group formation. As a general principle, tying the approval of a policy document to the pre-emptive preparation of an implementation tool (the Terms of Reference), already provided for in the official plan, VOP 2010 Volume 1, is a concern. It is recommended that (b) be deleted, as in practice it could lead to appeals.</p>	<p>We have modified the policy by removing the tie to secondary plan approval and qualified which items are to be consulted on with TRCA.</p>	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Vaughan	7.5.2.3	(c) An average greenfield draft plan of subdivision contains over 200 conditions and some of these do overlap with block plan requirements. Greater specificity on items of concern to TRCA or items TRCA views as a prerequisite to draft plan of subdivision should be provided as it can be effectively argued that some of these 200 or so items could be deferred or completed concurrently with the draft plan of subdivisions. Perhaps a list of mandatory studies that should be completed at the block plan stage prior to approval of a draft plan of subdivision should be listed as an Appendix to the document.	We have qualified in the policy that it should be those MESP items identified in the TRCA Planning and Development Procedural Manual, that are to be completed to TRCA's satisfaction in advance of municipal conditional approval.	Y
City of Brampton	7.5.2.5	(a) (iv) The application of a no development policy to existing vacant lots with zoning rights appears as a very broad prohibition that may conflict with typical exemptions for existing lots of record found in official plans, as well provincial plans such as the Greenbelt Plan. It would be more appropriate to identify requirements to direct development outside of natural features where possible and if impacts cannot be avoided to minimize and mitigate the impact of development to the greatest extent possible.	The policies for existing lots of record in the planning chapter are recommendations to approval authorities; this policy section is consistent with the permit policies where TRCA is the decision maker (i.e., where the lot is within a regulated area). The policies are found in both chapters (both processes) consistent with current practice where TRCA proactively states its position on existing lots of record (within a regulated area) in the Natural System early in the planning process before an application gets to the permit stage. TRCA always endeavours to work with a proponent to meet our Regulation's requirements.	N
City of Markham	7.5.2.5	(a) This policy provides criteria for the development of a lot of record. This policy is too restrictive. Development of a legal lot in accordance with the zoning by-law, cannot be prohibited under applicable law.	The policies for existing lots of record in the planning chapter are recommendations to approval authorities; this policy section is consistent with the permit policies where TRCA is the decision maker (i.e., where the lot is within a regulated area). The policies are found in both chapters (both processes) consistent with current practice where TRCA proactively states its position on existing lots of record (within a regulated area) in the Natural System early in the planning process before an application gets to the permit stage. TRCA always endeavours to work with a proponent to meet our Regulation's requirements.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Mississauga	7.5.2.5	Can a permit for a legal lot be refused in the context of Planning Legislation?	TRCA always endeavours to work with a proponent to meet our Regulation's requirements. However, the <i>Conservation Authorities Act</i> is not bound by the <i>Planning Act</i> . Refer to section 8.1 of the LCP, under "Relationship to Section 7 (Environmental Planning)", paragraph 2 for further discussion on this.	N
Peel Region	7.5.2.5	(a) (iv) The application of a no development policy to existing vacant lots in "any natural features or areas, hydrologic functions or ecological functions contributing to the conservation of land" is a vague and potentially very broad prohibition that is a conflict with typical exemptions for existing lots of record found in municipal OPs, the Regional OP, and provincial plans including the Greenbelt Plan and ORMCP. A more effective policy could simply state requirements to direct development outside of natural features where possible and if impacts cannot be avoided to minimize and mitigate the impact of development to the greatest extent possible. Similar wording can be found in the Region of Peel OP and provincial plans referenced above.	The policies for existing lots of record in the planning chapter are recommendations to approval authorities; this policy section is consistent with the permit policies where TRCA is the decision maker (i.e., where the lot is within a regulated area). The policies are found in both chapters (both processes) consistent with current practice where TRCA proactively states its position on existing lots of record (within a regulated area) in the Natural System early in the planning process before an application gets to the permit stage. TRCA always endeavours to work with a proponent to meet our Regulation's requirements.	N
York Region (Long Range Planning, Public Health, ES)	7.5.2.5	(a) (iv) Prohibiting the development of a house on an existing lot of record based on the criteria set out in this policy may be overly restrictive. In these instances, finding the most viable building envelope is generally the approach taken. Policies i through iii should be captured through regulation administration (Chapter 8) and the (b) section of this policy seems to defer to other policies. Accordingly, it may be preferable to delete this policy in its entirety.	The policies for existing lots of record in the planning chapter are recommendations to approval authorities; this policy section is consistent with the permit policies where TRCA is the decision maker (i.e., where the lot is within a regulated area). The policies are found in both chapters (both processes) consistent with current practice where TRCA proactively states its position on existing lots of record (within a regulated area) in the Natural System early in the planning process before an application gets to the permit stage. TRCA always endeavours to work with a proponent to meet our Regulation's requirements.	N
City of Brampton	7.5.2.6	(d) and (e) Are these not the same?	Correction made - d) has been deleted.	Y
City of Mississauga	7.5.2.6	(d) and (e) could be combined.	Correction made - d) has been deleted.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	7.5.2.7	(a) This policy restricts development and site alteration in the natural system for minor variance applications. This policy is not reasonable and does not fit into the criteria established under the Planning Act for consideration of minor variance applications. Some flexibility is required.	This policy is a recommendation where applicable, e.g., minor variance required for addition or ancillary structure on a lot that backs onto the Natural System - policy would apply to state that the structure should be outside the System; or if lot is already in the System, see 7.5.2.7 b) for flexibility.	N
York Region (Long Range Planning, Public Health, ES)	7.5.2.7	(a) the nature of the development or site alteration proposed through minor variance applications can be quite insignificant; this policy may not be reasonable.	This policy is a recommendation where applicable, e.g., minor variance required for an addition or ancillary structure on a lot that backs onto the Natural System - policy would apply to state that the structure should be outside the System; or if lot is already in the System, see 7.5.2.7 b) for flexibility.	N
Environmental Defence	8	<p>Commit to greater transparency in permitting decisions that may undermine the protective policies outlined in the LCP. The document should outline what the TRCA will do to ensure consistent and transparent permitting processes for controversial projects, land uses and other activities that may have a detrimental impact on human and ecosystem health.</p> <p>To improve transparency, we recommend TRCA's governing policies outline how and under what circumstances it will engage in negotiations that may undermine the LCP objectives to protect human and ecosystem health as well as opportunities for residents to participate in the decision making process.</p>	Policies in 8.13, Implementation and Compliance, deal with TRCA's transparency in the regulatory decision-making process. As well, TRCA's Planning and Development Procedural Manual outlines the processes of how planning and permit applications are reviewed. The Authority and Executive Committee Boards meet monthly to review and approve staff recommendations on permit applications.	N
Town of Aurora	8	The Town is also supportive of the objectives and policies proposed in Chapter 8 as they also reflect best practices and propose setbacks from environmental features which are consistent with the Provincial requirements.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Building Industry and Land Development Association (BILD)	8	We acknowledge that the word "interference" comes from Conservation Ontario, but we believe there is an opportunity to replace the use of this word with "intersection" or "interest", which has a neutral connotation.	The word "interference" comes from TRCA's provincially approved Regulation. Application of this terminology is described in C.6. Consideration will be given to providing additional diagrams within the relevant sections for the final version of The LCP.	N
York Region (Long Range Planning, Public Health, ES)	8	Several policies in Chapter 8 permit development in regulated areas or natural heritage features subject to a series of requirements (supporting studies demonstrating no impairment and/or compensatory works). These policies are reasonable and should be implemented and adhered to for all projects, staff have noted that in development negotiations, TRCA positions have seemed far more rigid.	Comment noted. Policies are generally reflective of current practice.	N
Ministry of the Environment	8	Section 8 appears to provide a good level of detail on how the TRCA administers their regulatory authority under Section 28 of the Conservation Authority Act. MOE staff were not given sufficient time to review the policies in this section of this document in order to evaluate whether this policy direction can effectively allow the TRCA to administer its regulatory authority. The policies were also not reviewed for consistency with provincial legislation, regulation, policies or program direction.	Comment noted.	N
City of Toronto (Planning)	8	Chapter 8 of the draft LCP incorporates policies from the VSCMP and well as new policies. However, because the format of chapter 8 is different from the VSCMP it is difficult to identify which policies are new and to compare current and proposed policies. It would be helpful in reviewing the draft LCP if TRCA could identify which policies are new and highlight any changes that have been made to existing VSCMP policies.	The format of the LCP follows provincial direction from CALC (Policies and Procedures for Conservation Authority Plan Review and Permitting Activities) for being clear on roles and responsibilities when commenting. The LCP is largely reflective of current practice which uses the VSCMP as guiding policies. All of the VSCMP policies have been carried forward but separated into planning and permitting roles in accordance with CALC direction.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Toronto (Planning)	8	The Summary Document (p. 1) indicates that the LCP is "comparable to a combined municipal official plan and zoning by-law". As you know, municipal council decisions are required to conform to municipal official plans and zoning by-laws. To assist in understanding how the LCP will be implemented, it would be helpful to know if decisions of the TRCA board will conform to the entire LCP document or only those sections that apply to the TRCA's regulatory role under Section 28 of the CA Act.	The entire LCP will be a Board-approved document and will inform our advocacy and planning roles and responsibilities as outlined in Sections 6 and 7. TRCA's Board is the decision-maker for permit applications under TRCA's Section 28 Regulation. Policies to implement the Regulation are in Chapter 8 of The LCP.	N
Ministry of Natural Resources	8	How does the TRCA deal with things such as out building less than 100 square feet in already developed areas, placement of topsoil for gardening, grading or adding new gravel to driveways, ditch cleanouts etc. within regulated areas?	Some regulated activities may qualify as "minor works". Qualification criteria for permission for minor works or for routine infrastructure works are in the Planning and Development Procedural Manual and are posted on the TRCA website. Also see policy 8.13.5.	N
City of Markham	8.2	This section deals with TRCA's regulated areas. Staff have concern with the use of the word "apparent" in the paragraph in the 1st green box on page 99. A better classification system or description should be included to identify what should be included as a valley corridor.	Apparent and Non-Apparent River or Stream Valleys is the terminology in TRCA's Regulation and the Generic Regulation as approved by the Minister of Natural Resources. The Regulation defines the limits of apparent and non-apparent river or stream valleys. See Appendix C of The LCP for more detailed information on this.	N
City of Brampton	8.2	Paragraph 1; Bullet 3: Can you provide some examples of "other areas" that may be regulated.	The area of interference around wetlands is regulated under this provision in TRCA's Regulation. See description and annotated diagram in Appendix C 6 for an illustration of this.	N
City of Brampton	8.2.1	Bullet 6: could you please clarify "other areas" where development could interfere with the hydrologic function of a wetland.	See Appendix C of The LCP for an annotated illustration of this. A link to Appendix C will be added to section 8.2.1.	N
Peel Region	8.2.1	Clarify statement that a municipal fill by-law cannot overlap with an area regulated by a CA. Can municipal fill by-laws in CA regulated areas address matters that are outside the jurisdiction of CA's under s.28 of the CA Act?	No, municipal fill by-law does not apply if regulated by TRCA, and therefore coordination among all the parties is recommended.	N
Town of Ajax	8.2.3	These tests appear to be fundamental and should therefore be highlighted separately.	The tests have been bolded for emphasis.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	8.2.3	This section deals with regulation tests. It is almost impossible to avoid impact of development on erosion (volume control) and to date there are no guidelines or standards that can have a development with zero increase in the volume of stormwater. The word "adjacent to valley corridor" is not clear.	Comment noted.	N
Peel Region	8.2.3	Is TRCA's definition of the "conservation of land test" consistent with other CA definitions within Peel Region? Consistency of definitions and the application of policies is encouraged.	CVC uses the Conservation Ontario (2008) interpretation. The LCP glossary has both interpretations. The MLC interpretation has been upheld in more recent TRCA tribunals. They are similar interpretations.	N
Peel Federation of Agriculture	8.2.3	The PFA objects to the use of the Mining & Lands Commissioner for appeals of decisions by conservation authorities which are municipal agencies, and the PFA requests appeals are heard by the Ontario Municipal Board.	The Office of the Mining and Lands Commissioner has been delegated the authority, duties and powers of the Minister of Natural Resources through legislation to hear appeals of permitting decisions under Section 28 of the Conservation Authorities Act. The request to change this is outside the scope of The LCP.	N
City of Markham	8.4	More clarification and discussion is required regarding "systems contributing to the conservation of land". This same wording was used in other sections (8.5.1.3 h).	Section 8.2.3 describes the conservation of land test from TRCA's Regulation. The wording in this section has been amended to provide further discussion.	Y
City of Brampton	8.4.2	<ul style="list-style-type: none"> • (c) Please clarify whether Headwater Drainage Features are considered watercourse? • (c) There should be recognition that altering a HDF/watercourse could provide an opportunity to create a net benefit to the NHS by creating connections to features. As well, altering HDFs can increase land use efficiencies while minimizing conflicts with infrastructure, etc. • (h) As currently worded, the policy is to "maintain groundwater recharge areas". Should the policy refer to maintaining groundwater recharge "functions" instead of "areas"? • (l) Are the restoration works being viewed as a requirement of compensation for works being allowed in the regulated area? 	<ul style="list-style-type: none"> • Refer to glossary definitions of Headwater Drainage Features and Watercourses, as well as policy 8.8.2. • TRCA's "Evaluation, Classification and Maintenance of Headwater Drainage Features Guidelines" will be used to guide the management of these features, which addresses your comment. • "Areas" has been removed. • Yes, restoration works may be necessary in order to meet the tests of the Regulation (e.g., planting to prevent erosion). 	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Durham Region	8.4.2	Policy 8.4.2 e) uses the term "avoided and mitigated" while Policy 8.4.2 f) uses the term "avoided or mitigated". It is suggested that the terminology be consistent.	(e) has been changed to "or" to be consistent	Y
Peel Region	8.4.2	(e) Should the phrase "impacts on natural features and functions are avoided and mitigated" be changed to "...are avoided or mitigated" to be consistent with 8.4.2 f)?	(e) has been changed to "or" to be consistent	Y
York Region (Long Range Planning, Public Health, ES)	8.4.2	Potential contradiction: 8.4.2: Describes conditions under which TRCA will permit "development, interference or alteration" in a regulated area. 8.4.3: States that TRCA will not permit "development, interference or alteration" in a regulated area... to "create additional area to accommodate growth or facilitate new development or intensification". If not development or intensification, the circumstances where policy 8.4.2 would apply should be clearly outlined.	The circumstances where 8.4.3 may be considered are outlined in 8.4.5. Please also refer to Section 8.3.2 on the policy structure of the document.	N
Peel Region	8.4.2	(h) As currently worded, the policy is to "maintain groundwater recharge areas". Should the policy refer to maintaining groundwater recharge "functions" instead of "areas"?	Policy h) has been modified to remove the word "areas".	Y
City of Brampton	8.4.4	Given the intent of this policy to not allow development, interference and alteration that would facilitate new development or intensification, it would be appropriate that it follow Policy 8.4.1. However, further explanation is necessary with regard to "natural features, areas and systems contributing to the conservation of land", which could be interpreted very broadly and prohibitively. Consideration should also be given to the use of site specific EIS.	Section 8.2.3, which discusses the conservation of land has been modified to be more clear. Requirements for an EIS are covered in policy 8.4.5 b) - an EIS may be captured under the term, comprehensive environmental study.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Region	8.4.4	These policies require further explanation from TRCA staff. The inclusion of all areas regulated by TRCA and the reference to "natural features, areas and systems contributing to the conservation of land" is potentially very broad and prohibitive. The justification in Section 8.4.5 b) requires broad scale studies or EAs to be completed. Does this exclude the option of site specific EIS even in situations when a site specific EIS may be acceptable to TRCA? How will this be applied in urban, rural and agricultural areas? Has TRCA provided mapping of "natural systems contributing to the conservation of land"?	This policy is consistent with current practice in implementation of the Regulation through the VSCMP. Policy 8.4.5 b) uses the term comprehensive environmental study, which can capture an EIS for a large site. There is no mapping, but there is an explanation in section 8.2.3, second paragraph; the text has been amended to be more clear.	Y
City of Brampton	8.4.5	Please qualify whether this policy applies to HDFs.	Yes, if the HDF is determined to be a watercourse.	N
City of Brampton	8.4.6	<ul style="list-style-type: none"> • (b) Please qualify that TRCA does not regulate other wetlands <0.5 ha. • (c) This policy indicates a very broad prohibition which may conflict with municipal official plan exemptions for existing lots of record. A rationale should be provided as to why an appropriate exception cannot be provided subject to an applicant demonstrating how the "regulation tests" can be met similar to TRCA's policies in sections 8.2.3, 8.4.1 and 8.4.2. <p>Furthermore, as per Comment 41, it is unknown how TRCA intends to define or interpret "natural features, areas and systems contributing to the conservation of land".</p>	<ul style="list-style-type: none"> • (b) TRCA regulates all wetlands regardless of size. • (c) There may be circumstances where there is a conflict between official plan exemptions and TRCA policy. Please refer to Section 8.1 (paragraphs 4 and 5) for rationale. Policy 8.4.6 is reflective of current practice. 	N
Town of Caledon	8.4.6	<ul style="list-style-type: none"> • There are two "(b)" listed. • Language is unclear. Are all identified pieces of PSW and ORM Wetlands protected or only those 0.5 ha and larger, as in the case of "other wetlands"? This issue of wording also appears in section 8.7.2. 	Corrected. Minor changes have been made to 8.4.6 and 8.7.2 to clarify. Policy applies to all wetlands on the Oak Ridges Moraine and all PSWs, regardless of size.	Y
City of Mississauga	8.4.6	(c) We feel this prohibition is very broadly defined and could be problematic during implementation in dealing with stakeholders. Unfortunately we do not have a constructive suggestion for revision.	Comment noted.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Region	8.4.6	Consider adding "the floodway portion of the flood hazard in approved Two Zone Policy Areas" to the list of prohibited areas.	Covered under policy 8.5.2.2.	N
Peel Region	8.4.6	(c) Is a very broad prohibition that is a conflict with typical exemptions for existing lots of record in municipal official plans, the Region of Peel OP, and provincial plans including the Greenbelt Plan and ORMCP. A rationale should be provided as to why an appropriate exception cannot be provided subject to an applicant demonstrating how the "regulation tests" can be met similar to TRCA's policies in Sections 8.2.3, 8.4.1 and 8.4.2.	(c) There may be circumstances where there is a conflict between official plan exemptions and TRCA policy. Please refer to Section 8.1 (paragraphs 4 and 5) for rationale. Policy 8.4.6 is reflective of current practice.	N
Town of Ajax	8.4.7	8.4.7b) and 7.3.1.4 - Wetlands - a minimum 10 metre buffer is required for wetlands other than provincially significant wetlands and wetlands on the Oak Ridges Moraine (Town OP requires a minimum buffer of 30 metres plus what is recommended in an EIS for any type of wetland). Staff recommend that a 30 metre setback should be applied to all wetlands.	Policy 8.4.7d) and e) address this issue.	N
Town of Caledon	8.4.7	Another CA with jurisdiction in Caledon (LSRCA) applies development policies reflecting "warm-water" or "cold-water" regimes that result in significantly different minimum watercourse setbacks (15 m & 30 m from watercourses* as opposed to 10 m from meander belt within TRCA's jurisdiction). Please identify the rationale used to establish TRCA's 10 m meander belt setback. Is there any mechanism for maintaining consistency in policies between neighbouring conservation authorities? <i>*Section 4.2, Watercourse Protection, Lake Simcoe Region Conservation Authority Watershed Development Policies</i>	The 10-metre setback has been established through policy (VSCMP) in TRCA's jurisdiction since 1994. Setbacks may be greater than 10 metres as a result of policy 8.4.7 d) or e). There is no mechanism ensuring consistency among CAs, however, neighbouring CA policy documents were considered in the development of The LCP.	N
Town of Ajax	8.4.8	That setbacks may be further reduced for Valley and Stream Corridors, Wetlands, and the Lake Ontario shoreline is inappropriate and should be removed.	Policy reflects current policy (VSCMP) and practice for areas of existing development.	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Caledon	8.4.8	<ul style="list-style-type: none"> • Appears to be written to accommodate existing urbanized areas where space is already limited. The application of urban focused setbacks in less developed, spacious and rural locations (such as white belt areas found in the Town of Caledon) has the potential of eliminating the opportunities to provide greater protection setbacks from hazards that arise with first time development. • Please define what constitute "existing urbanized areas". • The setback distances referenced as being in Section 8.4.6 are actually listed in Section 8.4.7. • Why is an EIS not explicitly required where reduced setbacks to wetlands are proposed? 	<ul style="list-style-type: none"> • 8.4.8 applies to existing development within urban areas. • 8.4.7 applies to less developed, rural locations. • Corrected to refer to 8.4.7. • 8.4.8 c) has been modified to capture potential for other studies. 	Y
City of Toronto (Planning 2)	8.4.8	<p>To address TRCA's diverse jurisdiction, the LCP policies are intended to be broad and provide flexibility where appropriate but do not always align and may conflict with municipal OP policies. For example:</p> <p>8.4.8 Allows setbacks to be reduced provided conditions are met. Toronto OP policy 3.4.8 requires development to be set back by a minimum of 10 metres from long term stable top of bank.</p> <p>Given these different contexts, it is important that:</p> <ul style="list-style-type: none"> • there are no conflicts between LCP policies and municipal OP policies; • stakeholders understand that LCP policies will be interpreted in the context of municipal policies; • TRCA and municipal staff provide consistent messaging to applicants; • the policies are interpreted and applied in a consistent manner. 	<p>Policy 8.4.8 provides flexibility in cases of redevelopment subject to conditions. This is similar to policy 3.4.8 of Toronto's OP which states that alterations to existing development are exempt from the 10-metre setback. As well, TRCA staff coordinates this review with the municipality as per current practice.</p>	N
City of Vaughan	8.4.8	<p>May want to include a policy or reference the situation of existing heritage built form that may limit the application of standard buffers from stable top of bank.</p>	<p>This is captured by the wording of 8.4.8.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Ajax	8.4.12	The methodology for establishing freeboard should be documented for clarity.	The application of a freeboard is dependent on site-specific conditions and level of risk.	N
City of Brampton	8.4.12 (8.4.11)	<ul style="list-style-type: none"> • What criteria will TRCA use to determine either a linear or vertical freeboard? • The explanation for floodproofing indicates the "basic design or construction of ... properties to reduce or eliminate flood hazards". Is this implying the use of fill as floodproofing measure? 	<ul style="list-style-type: none"> • In the case of floodproofing, as 8.4.12, a vertical freeboard would be used given that it is for development physically located within the flood plain. • It may be acceptable (where it will not impact off-site flood levels/flood storage) to use a modest amount of fill to raise grades above the flood plain, where permitted by the planning and permitting processes. 	N
City of Brampton	8.5.1.3	(e) Please qualify what is meant by the "use is not intensified".	An example of intensifying a use is increased commercial uses beyond what currently exists, which would result in an increase in risk to property damage.	N
Town of Caledon	8.5.1.3	<p>(l) Please clarify why there is no cap on the maximum size of a residential addition in the flood hazard. The current wording appears to afford the owners of large dwellings the opportunity to build larger additions in flood hazards than owners of smaller dwellings. Should the intent of this policy not be to limit further development risk within identified hazard areas to an absolute minimum? The related policy applied by the CVC* sets a maximum addition size or combination of additions, at 50% of the original habitable ground floor, up to 100 square metres).</p> <p><i>*Section 7.2.2, Watershed Planning and Regulation Policies, CVC</i></p>	TRCA has applied a percentage rule for additions as opposed to a "cap" since 1994 with the adoption of the VSCMP. This practice is reflective of current policy and practice and represents a consistent approach to risk management that reflects the diversity of built form across the 18 municipalities in the jurisdiction; because of this diversity it is difficult to establish a reasonable "cap".	N
City of Markham	8.5.1.3	(b) This policy deals with the hydraulic floodway. The delineation criteria based on depth, flow, and velocity factors for the hydraulic floodway and floodway delineation in the One Zone concept could be referenced for consistency with MNR documents.	The policies in the LCP dealing with the hydraulic floodway are a carry forward from the VSCMP and reflect current practice.	N
Town of Caledon	8.5.1.4	(e) The current wording could be interpreted as if the presence of floodplain (which in some cases may be in addition to other hazard features) actually makes the location safer for expansion than those hazard situations where it is not present.	Agreed. Policy e) has been separated into e) and f) to provide greater clarity for replacement structures and additions within flood hazards versus erosion hazards.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Central Lake Ontario Conservation	8.5.1.10	7.4.3.2.5 (b) ii) and 8.5.1.10 (c) Permanent remediation in spill areas is definitely the best route to take. However, why is floodproofing generally discouraged in spill areas? It seems that if complete remediation of the site is not feasible then floodproofing must be available as the second option given that it can be demonstrated that there will be no upstream and downstream impacts.	The phrase "shall be discouraged" has been removed from policy 8.5.1.10 c) to improve clarity.	Y
Town of Caledon	8.5.3	List of Special Policies Areas (SPA) does not include the Bolton Core area identified in the Schedule A Map.	This omission has been corrected.	Y
Town of Caledon	8.6.13	(f) Please quantify what constitutes "fill for landscaping". It would be advisable to also quantify fill for grading, other "minor" uses and what would constitute "major filling" amounts. Is "fill for landscaping" to be considered minor in nature?	Fill for landscaping would be fill that meets TRCA's minor works criteria, which can be found in the Planning and Development Procedural Manual.	N
Ministry of Natural Resources	8.7	Section 8.7 covers the policies regarding interference with a wetland. Do the proposed policies permit direct discharge of stormwater from a SWM pond, to wetlands?	For SWM infrastructure, the general Infrastructure Policies in Section 8.9 (and more specifically, 8.9.8) would apply. These policies refer to TRCA's SWM Criteria document which states that stormwater must be treated before outletting to wetland.	N
Town of Caledon	8.7.2	The same issue as 8.4.6. Please consider rewording to clarify if 0.5 ha wetland size applies to all wetland types.	Corrected. Minor changes have been made to clarify. Policy applies to all wetlands on the Oak Ridges Moraine and all PSWs, regardless of size.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Peel Region	8.7.2	<p>The combined effect of policy 8.7.2 and 8.7.3 (d) to (f) would appear to capture all non-PSWs greater than 0.5 ha in size and a large number of smaller wetlands less than 0.5 ha. The policies would result in a very broad prohibition of development and no possibility to consider development in limited circumstances on a case by case basis as is currently permitted under the PPS and some municipal policies. The TRCA should provide a rationale as to why it is not appropriate to allow the application of the "regulation tests" under the CA Act through ecological evaluations on a case by case basis?</p> <p>While the Region supports and encourages the protection of all wetlands, current policy in the ROP allows the area municipalities to develop appropriate policies for smaller non-PSWs. It is also not clear why TRCA is mixing regulation policies for "development and interference with wetlands" with municipal planning policies for natural heritage features under the PPS (i.e. 8.7.3 (d) and (e)).</p>	<p>There may be circumstances where there is a conflict between official plans and TRCA policy. Please refer to Section 8.1 (paragraphs 4 and 5) for rationale. General policy 8.4.8 and wetland policies 8.7.3 to 8.7.5 provide flexibility subject to conditions. The wetland policies are reflective of current practice.</p> <p>With respect to the references to provincial designations in 8.7.3 d) and e), while we acknowledge that the <i>Conservation Authorities Act</i> is the jurisdictional authority in the permitting process (i.e., the five tests), we endeavour to achieve consistency with provincial direction under the <i>Planning Act</i>.</p>	N
Town of Ajax	8.7.3	<p>The policy indicates that development may be permitted within wetlands less than 0.5 ha in size subject to certain criteria. Staff are of the view that development should not be permitted in any wetland and respect the minimum 30 metre setback.</p>	<p>The Planning policies do not prevent municipal setback requirements from being met where they are greater than TRCA's. The Regulation policies in Chapter 8 may be for a stand-alone permit application where the Planning Act, the PPS and municipal policies do not apply.</p>	N
Niagara Escarpment Commission	8.7.3	<p>Part 2.6.10 of the NEP states that development shall be located outside of wetlands. To align with this requirement, NEC staff proposed that TRCA's policy 8.7.3 (a) be modified as follows: <i>(a) the wetland is not part of a provincially significant wetland, or a wetland on the Oak Ridges Moraine or within the Niagara Escarpment Plan Area.</i></p>	<p>Policy modified accordingly.</p>	Y
Peel Region	8.7.3	<p>Similar to 8.7.4, add a reference to policy 8.7.3 to the notwithstanding clause.</p>	<p>Comment unclear.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	8.7.4	Indicates that development, site alteration and/or interference will be permitted only if the conservation of land will "not be affected". I strongly recommend that these policies be revised to "not negatively affected" as it would be very difficult to satisfy given the comprehensive definition of conservation of land.	This is wording from the Regulation and the <i>Conservation Authorities Act</i> .	N
Town of Ajax	8.7.6	The policy indicates that a 10 metre development setback to a Regionally or Locally Significant Wetland may be reduced based on the results of a study or technical report. Staff are of the view that a development setback should be a minimum of 30 metres.	We have added some wording to this policy to recognize setbacks agreed to through the planning process. This is also already recognized in the general policies for setback, i.e., policy 8.4.7 e).	Y
Niagara Escarpment Commission	8.7.6	NEC staff recommends that Policy 8.7.6 (a) be modified as follows: That no new development is permitted within the greater of: (a) <i>30 metres of the provincially significant wetland or wetland on the Oak Ridges Moraine or wetland within the Niagara Escarpment Plan Area</i> .	Policy has been modified accordingly.	Y
York Region (Long Range Planning, Public Health, ES)	8.7.6	The heading preceding these sections is "Development within Other Areas – Area of Interference". It is unclear what is meant by "Other Areas" as it does not seem to appear within the policies.	Please refer to Section 8.2, the third bullet on "other areas" and Appendix C.6 "Defining Other Areas". Also, in the final version of the LCP we will move diagrams/illustrations from C.6 into the policies to be more clear.	Y
Town of Caledon	8.7.8	(g) Please clarify why a 10 m setback requirement is included if a "no closer than existing" alternative is also included.	Both are included because we want to maintain the principle of 10 metres but since this policy section deals with existing development, flexibility is required.	N
Town of Caledon	8.7.9	8.6.8 is referenced incorrectly, this policy should identify 8.7.8.	This has been corrected.	Y
City of Markham	8.8.2	This policy deals with the TRCA Headwater Features Study. Given the City's endorsement of the Markham Small Streams Study, we suggest "in addition to the TRCA's Evaluation, Classification and Management of Headwater Drainage Features Guideline another municipal study meeting the intent of the protocol, may also be considered as a management tool".	This issue has been addressed through recent discussions between TRCA and the City of Markham.	N

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York Region (Long Range Planning, Public Health, ES)	8.8.2	Speaks to TRCA's interim guidelines for headwater drainage features. Are the management strategies for headwater drainage features identified in the guidelines being implemented? If so, should this be identified in the policy? Currently, the policy appears to only reference the guideline as a tool for the identification of these features.	Policy 8.8.2 has been modified to address this.	y
Ministry of Natural Resources	8.8.4	Section 8.8.4 references permissions for alterations to watercourses. You may wish to include a policy that states realignments may be permitted where it has been demonstrated to the satisfaction of TRCA that there will be no adverse impacts on the ability of adjacent landowners to develop their properties" (setbacks / buffers that may be required along the realigned watercourse may now be on the adjacent property. I have seen a number of instances - not in TRCA's jurisdiction - where a realigned watercourse has resulted in setbacks and buffers suddenly being applied to an adjacent property where they were not previously affected with the original channel location. The realignment had inadvertently impacted the ability of the adjacent owners to fully develop their lands.)	Policy 8.8.4 c) has been modified to address this issue.	Y
York Region (Long Range Planning, Public Health, ES)	8.8.4	Describes the conditions under which a watercourse alteration may be permitted. Many of the conditions indicate "no impacts on". Depending on the rigidity of the interpretation of the reviewer, "no impact" may be an impossible result to achieve resulting in a de-facto prohibition of watercourse alteration. It is recommended that this section be better defined.	The introductory wording in 8.8.4: "demonstrated to satisfaction of TRCA gives staff the ability to apply reason to the phrase "no impacts on". Most references to this in 8.8.4 are qualified.	N

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Durham Region (Works Dept.)	8.9.2	Under the Class EA process, "replacement" of water or sewer systems is Schedule A, and "new" or "expanded" systems are Schedule A+ if they are within a road allowance or utility ROW and trenchless technology is used for any water crossings; therefore, under Class EA process, it is not necessary to explore "all feasible sites and alignments". The TRCA policy should be rewritten so that it is consistent with the Class EA process.	The phrase: "or equivalent technical report" captures infrastructure under the Class EA process or otherwise.	N
York Region (Long Range Planning, Public Health, ES)	8.9.2	(h) Indicates that development, site alteration and/or interference will be permitted only if the conservation of land will "not be affected". I strongly recommend that these policies be revised to "not negatively affected" as it would be very difficult to satisfy given the comprehensive definition of conservation of land.	This is wording from the Regulation and the <i>Conservation Authorities Act</i> .	N
York Region (Long Range Planning, Public Health, ES)	8.9.5	The policy introduction refers to underground infrastructure generally, with no reference to regulated areas or natural heritage features. The policy references "development, interference or alteration" but not an area or feature – "alteration of what" needs to be made clear. The policy indicates that "all feasible alternative sites and alignments have been considered through an EA". It is unclear what this is an alternative to, please clarify.	Like all of the policies in chapter 8 of The LCP, this policy applies only within TRCA regulated areas. Development, interference and alteration are all terms defined in the Glossary and are tied to TRCA's Regulation.	N
Durham Region (Works Dept.)	8.9.6	May not be feasible or practical.	Comment unclear.	N
Durham Region (Works Dept.)	8.9.6	(d) Are there parameters to work with for example minimum area of road widening before it is determined that the new section of road be treated for water quality?	The policy has been modified to be clear that both the new section of road and the existing section of road meet all of the SWM Criteria. This is reflective of current practice where treating roads for SWM has been shown to be feasible, even with land constraints, through newer technologies (i.e., LIDs, as discussed in the TRCA SWM Criteria Doc and the LID Guide).	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
SCS Consulting Group Ltd.	8.9.8	(b) The wording "where possible" should be added to the end of this clause, as there are many sites within TRCA's watersheds where the site grades are very flat relative to the receiving watercourse (i.e. not a great deal of topographical relief) and these sites would require a great (infeasible) amount of fill in order to raise the site such that the pond outlet could be above the 25-year floodline.	Agreed. The policy has been modified accordingly.	Y
Durham Region (Works Dept.)	8.9.10	(b) In the design of the location of the SWM facility will a minimum offset from the Region right of way be determined as this will help address the safety concerns associated with the travelling public.	Public safety is covered by policy 8.9.10 f). Siting would also be done in consultation with the municipality during the planning process.	N
SCS Consulting Group Ltd.	8.9.10	(f) SWM facilities are primarily municipal stormwater management infrastructure facilities which provide a specific function to control and treat stormwater runoff and should not be required or encouraged to be integrated as a public amenity. If the facilities are to be designed as public amenity spaces, a different approach should be considered by the municipalities and TRCA with regard to park integration.	The policy states that the facilities should be sited and designed to ensure public safety. However, we have also added "where appropriate" to this policy to address the comments.	Y
City of Brampton	8.10.2	We question whether this means that new golf courses will not be permitted in a regulated area in the future?	This regulation policy is consistent with the Chapter 7 planning policy which recommends that major recreational uses not be permitted within the Natural System.	N
City of Brampton	8.10.5	(b) States that "The trails be made of pervious surface material, unless otherwise required by Provincial accessibility standards". Please note that staff generally proposes the use of granular trail systems in the NHS, however this may not be possible in all cases. Brampton requests that the option for installing asphalt be permitted in situations where pedestrian access is required on dedicated school access routes that may cross a valley. This is proposed (for an area in CVC's jurisdiction) an option at the north end of the Mount Pleasant 51-1 NHS where maintenance of this route in winter was a concern, so that the children's safety could be ensured.	The word "generally" has been inserted in policy b) in order to account for these situations.	Y

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Cycle Toronto Ward Groups	8.10.5	(f) Designing trails to improve safety is a key priority. However, this point deserves elaboration. Often, misperceptions about trail safety have led to the outright cancellation or reduction in scope of trail projects. Local residents have expressed (unfounded) fears of increases in crime and vandalism; trail users have expressed fears about trail overuse, conflicts, or being given a "false sense of security". In most cases these fears have been shown to be inaccurate. For example, improved trail quality and servicing (such as lighting or winter maintenance) increases the active use of trails, resulting in more "eyes on the street" and thus improved safety through more monitoring. There is strength in numbers. Similarly, while busy trails appear to be a source of conflict, these trails are significantly safer than busy roadways for all trail users. It is imperative to apply the principles of comparative risk to trails.	Comment noted.	N
Town of Caledon	8.11	<ul style="list-style-type: none"> • This policy is located out of order (after Section 8.4.12, Flood proofing Standards). • This policy does not provide quantified Safe Access standards for water depth/velocity. Please identify. 	<ul style="list-style-type: none"> • Noted and changed. • Safe access standards are covered by Provincial standards and TRCA standards. 	N
City of Markham	8.11	Policy on dewatering, dewatering discharge and water taking. Please see comments above regarding Policy 7.4.4.1.1 (a).	Comment unclear. Policy numbers mis-quoted?	N
City of Vaughan	8.11.1	This section may be improved upon by showing the connection between MOE and TRCA permit information requirements. For example, clarification on what typical information requirements for an MOE Permit to Take Water overlap with TRCA information requirements might be helpful.	Guidance on the content of technical reports can be found in the the Planning and Development Procedural Manual.	N
York Region (Long Range Planning, Public Health, ES)	8.11.1	References "development, interference or alteration" but not an area or feature – "alteration of what" requires clarification.	Development, interference and alteration are all terms defined in the glossary and are tied to TRCA's Regulation, described in Section 8.2. We have modified the definition of <i>alteration</i> in the glossary, to be more clear.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
York Region (Long Range Planning, Public Health, ES)	8.11.1	I recommend that both these policies (8.11.1 and 8.12.3) be modified slightly to reference that their applicability is to applications for a permit, consistent with the other policies of this section.	Sentence added to preamble for this section to clarify tie to the Regulation.	Y
York Region (Long Range Planning, Public Health, ES)	8.11.2	<ul style="list-style-type: none"> • Policy 8.11.2 suggests that where dewatering impacts are unclear, the project should proceed subject to an ‘Environmental Management Plan’. This is reasonable, however, it is contrary to TRCA staff statements on multiple occasions (e.g. “TRCA does not support permanent dewatering”). • Suggest adding human receptors in addition to environmental receptors when considering the zone of influence for dewatering projects. 	<ul style="list-style-type: none"> • TRCA staff comments should reflect the policies; • Issues related to water supply are not in the purview of TRCA's regulation. 	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Lakeridge Citizens for Clean Water	8.12	<p>It is recommended that the TRCA's Living City Policies (LCP) Document Draft January, 2013 Section 8.12 include a large fill policy similar to the policies adopted by the KRCA (Large Fill Procedural Guideline) and CLOCA (Large Fill Policy). The fill policy should include necessary conditions as found in the CLOCA and KRCA fill polices, including those requirements listed below:</p> <ul style="list-style-type: none"> • Table 1 soils only on lands with no previous point source contamination-consistent with current KRCA and CLOCA policies; • Frequent testing of incoming fill at the receiving site following MOE's protocol for soils coming into an RSC property, i.e. 1 sample for every 160 cubic metres of incoming fill (MOE Fact Sheet: Bringing Soil to an RSC Property, April, 2011); • Proponent paid audit tests of incoming fill by TRCA staff or TRCA hired consultant; • Mandatory QP (qualified person as defined by O. Reg. 153) reviewing and signing off on source site soil reports at the receiving site; • Proponent paid TRCA consultant peer review of incoming soil reports; • Mandatory securities obtained reflecting the size of the fill operation. 	<p>TRCA is going to be developing guidelines for Large Scale Fill. We will use neighbouring CAs's guidelines to inform the development of these guidelines.</p>	N
Lakeridge Citizens for Clean Water	8.12	<p>It is hoped that the TRCA will appeal to the MNR for the need to develop regulations that allow conservation authorities to go beyond the constraints of meeting the "five tests" so that social and various environmental issues such as groundwater contamination concerns can be considered when permits are issued by conservation authorities. Various key definitions in CA regulations are also lacking and need significant attention if CA's are going to be able to apply their regulations in a consistent manner across the province.</p>	<p>Dealing with these issues is beyond the scope of the policy document.</p>	N

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Town of Caledon	8.12.3	<ul style="list-style-type: none"> • Large scale filling activity is not quantified (see 8.6.13) • Should consider including a cross reference to "minor alterations to grade/landscaping" as found in 8.5.1.8 or 8.6.13 f). 	While not quantified, the application of the Large Scale Fill policy would be established during pre-consultation on a permit application. The TRCA Administrative Fee Schedule for Permitting Services in the TRCA Planning and Development Procedural Manual quantifies fill for minor projects (threshold of 30 cubic metres).	N
York Region (Long Range Planning, Public Health, ES)	8.12.3	<p>Speaks to the requirement to consult with TRCA staff to confirm the scope of required studies and supporting documentation for large-scale fill placement proposals. This policy does not seem to reference the Conservation Authorities regulation. Does this policy apply to the entire watershed or just regulated areas?</p> <ul style="list-style-type: none"> • Does TRCA expect involvement with fill operations anywhere in watershed? • The policy indicates TRCA staff will designate required studies and documentation. For consistency and clarity, can the recent MOE guidance document for fill operations be used as a standard? 	<p>Like all of the policies in chapter 8 of The LCP, this policy applies only within TRCA regulated areas.</p> <ul style="list-style-type: none"> • Where municipal fill-by laws are in effect, TRCA's Regulation does not apply. • "...any other applicable agencies..." would capture MOE requirements 	N
York Region (Long Range Planning, Public Health, ES)	8.13.1	This provision is a right of the TRCA without the need for the policy. Inclusion may leave the impression that TRCA is unable to approve a permit that does affect an item in the list.	Comment unclear.	N
Town of Ajax	Glossary	Pollution - Should be completed to include references/regulations under the Conservation Authorities Act as noted.	The glossary definition of pollution includes a reference to clause 1 c) in Section 28 (25) of the <i>Conservation Authorities Act</i> . Clause 1 c) is about	N
Building Industry and Land Development Association (BILD)	Glossary	Please clarify the difference between an MESP and an urban MESP in the final Report. This should be inserted into the definitions section of the final Report.	The term urban MESP refers to an MESP for an area of existing development or redevelopment. For clarity, this is the description used in the policies (e.g., 7.5.2.3 d)). However, we have added a description of MESP for new development and redevelopment scenarios in the preamble for section 7.5.2.3.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
City of Markham	Glossary	Ecosystem Services: Can this definition be elaborated with examples. Natural System: The natural system definition and associated policies as presented provide high risk of conflict and interpretation relative to the City's Official Plan. As written the Natural Heritage System appears to be a TRCA's own system, yet the policy direction is to municipalities. We suggest the definition be revised to state that "natural system is comprised of water resources, natural features and areas, natural hazards, restoration areas, buffers and other natural or hydrologic elements as defined by municipalities and incorporated into Official Plans. Once incorporated into Official Plans the Natural System policies in The LCP apply to municipally defined systems."	Ecosystem services: the sidebar in section 7.1 of The LCP includes examples of ecosystem services. Natural System: Revisions have been made throughout the document to improve clarity in this regard, as explained through responses to specific comments.	N
Ministry of Natural Resources	Glossary	"Hydraulic floodway" is defined but not specifically defined for the lay person to understand.	A diagram that represents an example of the hydraulic floodway will be added to the final version of The LCP.	Y
Ministry of Natural Resources	Glossary	Under "safe access" what are the TRCA's standards for safe access?	TRCA's Water Resources Engineering staff are currently developing a Flood Plain Management Guideline which will include TRCA standards for safe access. In the interim, TRCA standards refer to Provincial standards.	N
Peel Region	Glossary	A definition is provided for Ecosystem Services and the thinking is whether the Glossary should have been Ecosystem Goods and Services when the content of the glossary is considered.	The glossary definition of Ecosystem Services has been revised from "goods and services" to "benefits" since that term captures both goods and services. Current literature simplifies ecological or ecosystem goods and services into the term "ecosystem services" and this is why this term was chosen for the LCP.	Y
City of Vaughan	Glossary	Appreciate the reference to legislation or the PPS for terms in the glossary. Are there other provincial documents that can be cited in this section, such as the Natural Hazards Technical Guides in relation to terms for flooding and erosion?	Other provincial guidelines are cited in the references and we acknowledge the MNR Technical Guides' under Provincial Standards in the glossary. As well, they've been added to the references.	Y

Commenter	Policy Section No	Comment	TRCA Response	Revisions made to The LCP?
Ministry of Municipal Affairs and Housing	Appendix B	pg 136 - Buffer and top of bank in parking lot - confusing? Add text to explain.	Explanatory text will be added to final version.	Y
City of Vaughan	Appendix B	Should this graphic also include a diagram of the stable top of bank to inform readers of this common situation?	The valley corridor graphic on p. 136 of the Jan 2013 LCP contains a depiction of stable top of bank (below the aerial photo).	N
Ministry of Municipal Affairs and Housing	Appendix C	C.6 (pg 143) Add explanatory box.	Comment noted - section Appendix will be updated accordingly in the final version.	Y
Town of Caledon	Appendix C	The text in the figures C.1-C.8 should modified to remove "up to" from the phrase "Allowance up to 15 m" to be consistent with the associated bullet	The words "up to" will be deleted to reflect TRCA's regulation in the final version.	Y
City of Mississauga	C.1	Given the flexible application of the 15m setback (e.g. 15m or up to 15m) it should be clear that this is not a required setback limit.	The words "up to" will be deleted to reflect TRCA's regulation in the final version.	Y
SCS Consulting Group Ltd.	C.4	This appears to be the same figure as Figure C.3 (where toe of slope is not subject to stream erosion), however it should be for "unstable slopes and active toe erosion"?	The incorrect figure C.4 will be replaced in the final version.	Y
City of Mississauga	C.5	Does this definition require you to meet all of the items, or just one to make it a wetland?	Because of the "and" in c), all of them are required to meet the definition.	N