

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Peel Region	General	Regional staff believes the Living City policies provide guidance and a sound basis for understanding the TRCA's role as a commenting agency and the organization's role in promoting the Living City vision.	Comment noted and appreciated.	N
Peel Region	General	Notwithstanding the above mentioned observations, the Region believes that the proposed policies if implemented provide a good basis for planning and development decision making as it clearly emphasizes the separate roles between the TRCA and the Region of Peel.	Comment noted and appreciated.	N
Township of King	General	Planning staff has a cooperative working relationship with TRCA staff as it relates to the evaluation of significant natural heritage and hydrological features, and protection of environmentally sensitive lands. This document appears to support this existing relationship.	Comment noted and appreciated.	N
Township of King	General	Planning staff is looking forward to the release of the Compensation Protocol, and requests to be included in any consultation associated with the document.	York Region has been included in previous meetings on the Compensation Protocol. For any upcoming meetings, any interested municipalities will be part of the consultation process.	N
Ministry of Natural Resources and Forestry	General	Great job over all! Very thorough. It looks like a lot of work was done in pulling this together.	Comment noted and appreciated.	N
Niagara Escarpment Commission	General	Overall, the document is well-organized and easy-to-read. We commend TRCA staff on the efforts made in preparing the LCP.	Comment noted and appreciated.	N
Town of Ajax	General	As noted in our earlier correspondence, staff support policies that are aligned with the Town's Official Plan. Staff also note that a number of improvements to the draft document have been provided in response to the comments issued by the Town and other agencies. These improvements include: Staff have reviewed the TRCA's responses to our initial comments and appreciate the technical responses on various components of the document which were helpful in clarifying comments on the first draft.	Comment noted and appreciated.	N

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City of Toronto (Zoning and Environmental Planning)	General	City Planning Division supports the modifications made to Wording of policies in chapter 6, 7 and 8 of the draft LCP which help to clarify the relationship between the Living City policies and municipal official plans. We also support TRCA's role in protecting, restoring and enhancing Toronto's natural heritage system through comments on planning applications. In general, the draft LCP policies support and reinforce the City of Toronto's natural heritage policies, however, there are situations where the draft LCP policies may permit a lower level of protection (e.g., a reduced set back from top of bank) than identified in the City's Official Plan and Zoning bylaw. In such cases, TRCA comments on planning applications should recognize and support the City's Official Plan and Zoning bylaw as the minimum level of protection. This would ensure a consistent approach to development applications by both the City and TRCA and consistent messaging to applicants and other stakeholders.	The policy for the consideration of reduced buffers is for redevelopment only (not new development) and is contingent upon municipal requirements for buffers being met (see i) of policy 7.4.2.1 a). In addition, many policies in the LCP that have flexibility built into them, are specific about the prerequisite of meeting municipal requirements.	N
City of Toronto (Zoning and Environmental Planning)	General	Toronto City Planning is proposing changes to environmental policies in the Toronto Official Plan.. Based on our review, no conflicts were identified between policies in the draft LCP and proposed changes to the Official Plan environmental policies. The proposed Official Plan policies are coming forward for public consultation in November 2014 and final report in 2015. For additional information, please refer to the following link: http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2014PG35.19	Comment noted and appreciated.	N
City of Brampton	General	As previously noted, the City finds the LCP an excellent document that explains TRCA's many roles in planning and development as service provider and landowner; advocating for the Living City; how TRCA's regulations, current documents and the VSCMP are interrelated; and promoting the latest science and system approaches for natural heritage, water management, adaptive management, cumulative impacts and ecosystems services to ensure the sustainability of the natural and built environment.	Comment noted and appreciated.	N

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City of Mississauga Environmental Services Section	General	The City of Mississauga, Environmental Services Section, has reviewed the revised LCP document and have no additional comments.	Comment noted and appreciated.	N
City of Mississauga Parks & Forestry	General	Thank you for the opportunity to comment on The Living City Policies for Planning and Development in the Watersheds of the Toronto and Region Conservation Authority. We have no specific concerns related to the document from a Mississauga Park Planning/Park Development perspective. We look forward to the final draft.	Comment noted and appreciated.	N
City of Pickering	General	We commend TRCA for the work done on the revised draft LCP and for addressing the City of Pickering's initial concerns and comments. The revised draft is a comprehensive policy document that appropriately sets out TRCA's roles and responsibilities. We look forward to continuing to work collaboratively with the Authority in the Planning and development approvals process.	Comment noted and appreciated.	N
City of Vaughan	General	The City of Vaughan reviewed the latest draft of the Living City Policies and the City is generally satisfied that the comments provided by the City in May 2013 have been addressed in the latest draft. I also had the opportunity to discuss the policies regarding the terrestrial natural heritage system with Laurie Nelson and I am satisfied that the appropriate recognition of responsibility is reflected in the policies.	Comment noted and appreciated.	N
Durham Region	General	The Region is generally supportive of the LCP and believes it will assist all stakeholders.	Comment noted and appreciated.	N
York Region	General	The LCP is supportive of Provincial and Regional land use policies and roles in protecting and enhancing its natural heritage features, including watersheds, natural green elements in urban landscapes, natural hazards and designated land uses that are to be conserved or protected this is beneficial and should be retained in the document. It is recommended that TRCA clearly separate legislative requirements and mandated responsibilities from the policies which provide value-added services.	Comment noted. The separation has been achieved through the three different policy chapters. In addition, when implementing the policies, TRCA staff will be clear in their correspondence to municipalities about which capacity we are providing comments in, (in accordance with our Memorandums of Understanding).	N

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York Region	General	York Region staff are appreciative of the opportunity to provide comments on the Living City Policies. As stated in our previous comments, York Region staff is supportive of the Living City Policies in general. Creation of a strategic guidance document that articulates the planning, development and regulatory policies of the conservation authority in watershed management will provide clarity and improve consistency in TRCA’s planning and regulatory processes.	Comment noted and appreciated.	N
Town of Caledon	General	For reasons of clarity, please consider incorporating the TRCA’s responses to the following Caledon comments (May 2014) directly in the body of the LCP document: both General Comments	The corresponding responses to Caledon's general comments deal with the development of the LCP and the procedures around multi-CA jurisdictions on one property. This type of information is not suitable for the main policy document. The informal coordination associated with multi-CA properties may be added to TRCA's Planning and Development Procedural Manual in its next update.	N
Niagara Escarpment Commission	1.5	The descriptor for Section 2 of the LCP suggests that this section provides a “political and physical description of TRCA’s jurisdiction...” However, the information presented in Section 2 appears to also describe the natural system (i.e., biophysical system rather than just physical system). As such, the text could be revised to reflect this.	The text has been revised.	Y

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City of Toronto (zoning by-law and environmental planning)	2.1	<p>The Greenbelt Plan recognizes the importance of river valleys that run through existing or approved urban areas and connect the Greenbelt to inland lakes and the Great Lakes and identifies these river valley connections in the Schedules to the Greenbelt Plan. Consideration should be given to identifying Greenbelt river valley connections in Figure 2.1 of the LCP.</p> <p>Toronto City Planning has proposed an amendment to the City of Toronto Official Plan to identify the Don and Humber Rivers and Etobicoke Creek as Greenbelt river valley connections because of their importance as ecological and hydrological connections between the Greenbelt and Lake Ontario. The proposed amendment is part of draft policies that are coming forward for public consultation in November 2014 and final report in 2015. For additional information, please refer to the following link:http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2014PG35.19</p>	<p>Figure 2.1 (now 2.1b) has been updated to show more detail, including more prominently showing the river valleys, but given the scale and purpose of the map, does not show designations within the Greenbelt or the Oak Ridges Moraine. In addition, Section 7.2.1 briefly describes the urban river valley designation.</p>	Y
Town of Caledon	2.1	<p>Section 2.1 still appears to omit reference to Simcoe County and Dufferin County on the list provided.</p>	<p>They are not participating, or "member municipalities", unlike Mono and Adjala-Tosorontio which are.</p>	N
Ministry of Natural Resources and Forestry	2.3	<p><i>(Previous comment</i> - 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.) <i>New comment</i> - MNR notes that this was not amended (as noted on the "TRCA Response to Comments" on the LCP chart). **MNR refers the TRCA to Section 5.4 on Page 43 of the Greenbelt Plan in this regard.</p>	<p>Policy 5.4 of the Greenbelt Plan states that other regulations (such as a CA regulation) shall apply within the Greenbelt Plan area. Any application falling under the Greenbelt Plan in a (CA) regulated area must conform to the GB Plan. But if the CA's regulation is more restrictive, it can prevail. TRCA's planning and regulation policies in the LCP are consistent with the Greenbelt Plan's natural heritage system policies (3.2.2) and may be more restrictive in some instances.</p>	N

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York Region	2.3	Recommend removing word "potential" when referring to climate change impacts. Recommend adding reference to extreme heat events and freezing rain when describing climate change impacts, adding extreme heat events when referring to public health challenges. Recommend adding reference to recently approved PPS (2014)	The word "potential" is generally used when describing climate change since research is ongoing in terms of what the actual magnitude and direction of the impacts will be. The 2014 PPS uses the term in its new policy (3.1.3) on climate change and natural hazards . Section 6.2 of the LCP is a full section on climate change that mentions increases in heat events. We have added freezing rain to the list of predicted changes. A reference to the PPS 2014 policy on climate change and natural hazards has been added.	Y
City of Markham	3.2	Table 3.2 If this table is to identify all the major guidelines and standards that inform development approvals, then the major standards and guidelines prepared by municipalities must also be referenced. The current table only identifies all the guidelines prepared by TRCA (stormwater management, Headwater Management etc.) and not the equivalent and comparable standards that are used by municipalities to direct the implementation of development and infrastructure. Development and planning approvals must consider municipal guidelines and standards where these are in place.	This table is not meant to identify all of the documents that inform development approvals. It is meant to identify all of the documents that may be considered by TRCA staff in the planning and development process (as stated in the LCP before the table). However, we have added "municipal standards and guidelines" to the existing row on municipal documents in this table.	Y
Niagara Escarpment Commission	3.2.1	Table 3.2 – As noted in our previous letter, "Niagara Escarpment Development Commission" should be revised to read "Niagara Escarpment Commission". The response table suggests that this has been amended but we note that this does not appear to be the case in the latest version of the LCP.	This oversight has now been corrected.	Y
York Region	4	This section provides a good background history on TRCA. Recommend including a timeline summarizing key events/changes that illustrate the evolution of TRCA.	A summarized timeline can be found on the last two pages of The Living City Policies Summary Document (brochure). This timeline has been added to the end of Section 4 in the final LCP document.	Y
York Region	5.3	One of the four strategic objective pillars identified is "business excellence". In general, the document is not clear on the approaches or paths to measure the outcomes and effectiveness or the diverse funding sources in the policies identified in the document.	Policies related to "business excellence" have been added to Section 7.5.2 of the LCP.	Y

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Town of Ajax	5.4	Staff disagree (<i>see previous Ajax comment and TRCA response</i>) . The effects of urban boundary expansion encompass a number of policy areas, including the integrity and resilience of natural systems and protection from flooding and erosion hazards which merit its inclusion as a fundamental principle.	Resilience of natural systems is addressed in Principle 3, while the protection from hazards is expressed in Principle 6. The previously noted policies provide sufficient guidance for TRCA's recommendations to approval authorities regarding urban boundary expansions.	N
Town of Richmond Hill	5.4	<i>(Previous comment - 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.) New Comment – In particular, the second part of our comment has not been addressed. It is still our feeling that Principle 2 does not make sense (grammatically) and its intent (beyond the idea of "promoting a culture of conservation") is unclear.</i>	Principle 2 has been modified to be more clear.	Y
York Region	5.5	Recommend that health benefits be specifically mentioned within Principle 7. In our efforts to increase awareness about the link between human health and ecosystem health, it is important that the words human health be used and avoid categorizing it under environmental or social benefits.	Agreed. Principle 7 has been modified to incorporate "human health".	Y
City of Toronto (Zoning and Environmental Planning)	6	Please revise the text box on page 6-14 to read as follows: Some municipal programs relating to ecological design include Toronto's Bird Friendly Development Guidelines and the Toronto Green Standard. Many other municipalities in TRCA's jurisdiction, including Ajax, Pickering, Mississauga, Brampton, Vaughan and Richmond Hill, have, or are developing similar standards for "green "or ecological design.	These changes have been made.	Y

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City of Brampton	6	TRCA indicates that the "Living City vision is based on.... Sustainable Communities..." and this section introduces some of the 'paths' that TRCA is following to realize the sustainable communities' objective while indirectly meeting other strategic objectives. Most provincial and municipal planning documents speak to 'complete, compact communities', and at this time, 'sustainable communities' has not been defined in other document. We would suggest that TRCA include some qualification of what a sustainable community means within the context of the Living City.	Section 5.3 of the LCP outlines TRCA's four strategic objectives including the sustainable communities objective as: "To facilitate broad community understanding, dialogue, and action toward integrated approaches to sustainable living and city building that improves the quality of life for residents, businesses, and nature." Further, all of the subsections in chapter 6 represent and describe many important elements of sustainable communities.	N
Durham Region	6	It is noted in this section that the TRCA will complement its mandated regulatory and plan review role with its advocacy role described in Section 6. For the most part, the Sustainable Communities policies in Section 6 are consistent with the policies of the Regional Official Plan (ROP) regarding the development of healthy and sustainable communities. In the event of a conflict between the two documents the LCP should acknowledge that the policies of the ROP are paramount and would prevail.	This was already addressed in the text box, "How Chapter 6 Policies Will Be Used", i.e., policies are used as <i>recommendations</i> to approval authorities.	N
Durham Region	6	The policies in Section 6 of the LCP are intended to address the development of sustainable communities. For the most part, these policies are high level and consistent with the policies of the Regional Official Plan (ROP). The Region is supportive of policies that assist in the development of healthy and sustainable communities in Durham. However, should there be a conflict between the policies of the ROP and the LCP, it should be noted that the policies of the ROP will be paramount in the consideration of land use planning matters.	See response above.	N
York Region	6	This section discusses the paths to achieve the sustainable communities' strategic objective. The "paths" or policies to achieve the business excellence strategic objective (from Section 5.3) are not clear in the document. Recommend TRCA consider adding a sub-section in Chapter 6 that discusses financial management policies, framework or paths to implementing the policies (Similar to York Region Official Plan 4-5)	Policies related to "business excellence" have been added to Section 7.5.2 of the LCP.	Y

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City of Brampton	6.1	<p>The City appreciates that TRCA has provided additional explanation of how the Chapter 6 policies will be used with regard to the LCP and Chapters 7 and 8 in particular; however, we remain concerned about the implications of these policies. We would suggest the following changes to the explanation that may address this concern.</p> <p>How Chapter 6 Policies Will Be Used - Section 6 is comprised of policies for TRCA’s advocacy role in both the planning/ EA, environmental assessment, and regulatory review processes. These policies will be used as recommendations to approval authorities in TRCA’s role as a public commenting body, watershed resource management agency, and service provider and landowner. Section 6 also contains policies directing TRCA’s operations for its own lands. TRCA leads and partners in many research and community initiatives and as such, these can that also inform and complement its-our plan review and regulatory roles as identified in Chapters 7 and 8 with respect to the planning and development of sustainable communities. The policies in this section are also meant to speak to efforts TRCA and its partners are making to deal with some of the issues and challenges described in Section 2.3 of The Living City Policies.</p>	<p>This Chapter 6 text box was expanded in the last version of the LCP in order to address comments similar to yours with respect to implications for the use of the policies. In particular, the phrase "recommendations to approval authorities" should remain since it was added to address other stakeholders' comments regarding the prevalence of municipal policy in the planning process.</p>	N
York Region	6.1	<p>Recommend adding "natural heritage" and "natural hazard management" to the glossary. Recommend that public health groups be specifically mentioned as one of the partners with common objectives.</p>	<p>Natural heritage and natural hazard management are defined and described throughout the document, and cannot be captured in one to two sentences in the glossary. We have added public health to the sentence with the list of partners in the introduction of Chapter 6.</p>	Y

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City of Markham	6.2	Policy 6.2. The TRCA's SWM Criteria Document (August 2010) does not mention climate change. The LID Design Guide has casual mention of climate change in a couple instances but does not describe any climate change impacts to be addressed or any adaptation requirements. If climate change impacts to base flow and erosion have been identified as suggested, and SWM adaptation measures are in place, there should be criteria identified.	Page 32 of TRCA's SWM Criteria Document states that the "increased awareness of changing climatic conditions and the challenges of infrastructure deficits have also encouraged innovation and evolution in the development of SWM solutions..." TRCA, in partnership with neighbouring conservation authorities and academic institutions, continues to conduct research on climate change that will inform future updates to the SWM Criteria Document. The Document's current approach promotes adaptive and resilient stormwater management that strives to meet pre-development hydrology, through run off volume control and low impact development (LID). The Ministry of the Environment and Climate Change, and the Provincial Policy Statement (2014), both promote LID, in combination with conventional SWM measures, as a valued approach to stormwater management and the potential impacts of climate change.	N
York Region	6.2	Recommend that "health impacts" be included in the first sentence along with environmental and socio-economic, in order to increase awareness about the direct links between human health and ecosystem. Recommend re-instating the reference to heat related impacts as in the previous draft or making reference to an increased number of extreme heat events. Recommend IPCC 2014 reference for statement on change in climate even if emissions were ended immediately.	Health related impacts are mentioned in the second paragraph of Section 6.2. The first bullet point in 6.2 mentions the impacts of heat. We have added a reference for the statement about emissions.	Y
Durham Region	6.3	This section includes a reference to the draft policies of the Provincial Policy Statement. The LCP should be revised to ensure that all references reflect the 2014 PPS.	The text has been revised to reference the 2014 PPS.	Y
Township of King	6.3	2nd Paragraph should be revised to remove the word "draft".	The text has been in revised to reference the 2014 PPS.	Y

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Town of Ajax	6.4	Although true, the benefits of intensification from the standpoint of reduced runoff, reduced pressure on stormwater infrastructure and reduced potential for environmental degradation are under TRCA's sphere of influence. Policies which articulate this relationship as they relate to urban boundary expansions support TRCA's mandate and should be articulated.	Policies 7.2.5 d) and 7.5.2.2 a), and their corresponding preambles, speak to urban boundary expansions. In addition, the preamble for 7.2.3 (The Urban Landscape) speaks to the issues mentioned in your comment.	N
Region of Peel	6.7	With respect to Green Infrastructure (Section 6.7), while the Region supports the use application of green infrastructure, we will continue to work with the TRCA to identify the feasibility and application of such infrastructure through the Environmental Assessment (EA) process. Peel has recently completed a document entitled "Guidelines for the preparation of stormwater management reports" which will serve as a companion piece to existing TRCA documents that guide stormwater management in regional road EAs and capital projects...including the application of Low Impact Development (LID). As LID is still in the early stages of application on regional facilities, we will work with the TRCA and other Conservation Authorities to look for pilot projects and develop metrics for measuring and reporting on said projects.	Comment noted and appreciated.	N
York Region	6.7	Recommend adding reference to human health benefits from green infrastructure as it directly relates to the examples provided (e.g. air / water quality, heat island mitigation etc.).	The sentence includes the term ecosystem services which is defined as contributions to human welfare.	N
City of Brampton	6.9.1	Page 6-15, last paragraph notes "Cultural heritage resources in TRCA's jurisdiction...". We would recommend using the term 'TRCA watersheds' as the term 'jurisdiction' generally has connotations of authority, control, influence, etc. which would not generally be the case unless a cultural heritage resource is located within the TRCA's property.	This substitution has been made.	Y

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Township of King	7	Additional clarification for the definition of cumulative impacts, including how such impacts would be identified, assessed, and mitigated, particularly as it relates to planning applications on a site basis, would be helpful and appreciated. Perhaps additional information could be included in a sidebar or text box.	Rather than a sidebar/text box, direction on the consideration of cumulative impacts is found in objectives, policies, and a definition in the LCP. For example, policies 7.2.5 a) and c), and the glossary definition of cumulative impact provide context and scale for which cumulative impacts are to be considered in regional/watershed/subwatershed/ shoreline reach), by TRCA staff. The term is also in the objectives in 7.4.4.1, which reflect the intent of the policies in 7.4.4.1. For instance, minimizing the number of infrastructure projects within a subwatershed or corridor reach (7.4.4.1 j)) is a measure for reducing (or mitigating for) cumulative impacts. TRCA staff will endeavour to achieve this minimization in considering planning and permit applications contemplating crossings within the same valley/stream corridor or shoreline reach.	N
City of Markham	7	The other polices simply start with "That". It would be helpful to identify and clearly distinguish the specific policies that are intended to provide a recommendation to approval authorities. This could be improved by starting the policies with "To recommend to approval authorities" where the policies are directed to municipalities. We note that some of these revisions have been made but not on a consistent basis. For example, policy 7.4.4.1 a) has changed the word "that" to "to recommend". This should be done consistently throughout the document.	The phrase "to recommend" is in some of the policies in the LCP where appropriate. The phrase "It is the policy of TRCA" is appropriate since this is TRCA's policy document, to be approved by TRCA's Board. The general nature of the phrase, "It is the policy of TRCA" is intentional, given that for many policies in Section 7, there may be inherent, one, two or more of TRCA's roles, i.e., public commenting body, resource management agency, service provider, delegated provincial interest, landowner.	N
Niagara Escarpment Commission	7.1	(Introduction)We recommend that consideration be given to amending the third paragraph in this section to better reflect the language of the 2014 Provincial Policy Statement (PPS), specifically related to maintaining, restoring or improving linkages between and among natural features and areas, surface water features and ground water features, as well as to the identification of natural heritage systems. The updated language in the PPS reinforces a systems-based approach to planning and management, rather than a features-based approach, which is the approach that the TRCA has long advocated for.	Agreed. We've added another sentence to this section regarding the PPS's reinforcement of the systems approach.	Y

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City of Brampton	7.1	We continue to advocate that Section 7.1 include text that indicates that municipal Official Plans recognize the connection/interrelationship of the natural and built environments, including the provision of ecosystem services across the municipality and the need to conserve and manage for environmental sustainability. Municipalities also have and/or will be developing sustainability guidelines / criteria, etc. While the May comments indicate that the last paragraph of this section was modified to recognize this issue that is not evident in the revised document.	The added wording referred to municipal objectives for building sustainable communities, which we felt addressed the comment. All municipalities in TRCA's watersheds may not have such policies or guidelines.	N
City of Markham	7.2.1	Reference to Little Rouge should reference 'creek' not 'river' on page 7-6.	This wording came from the Greenbelt Plan and the Rouge River Watershed Plan.	N
City of Brampton	7.2.1	A new paragraph has been added which recognizes the Greenbelt's promotion of Urban River Valley designations to protect natural and public open space lands along river valleys in urban areas. We would recommend additional text that recognizes the URVs in TRCA's jurisdiction that are being considered for designation and that this designation would apply to TRCA-owned lands in these systems, which are deemed public lands. TRCA may wish to express an opinion on supporting URV for their lands. As well, this document would benefit from including some text that TRCA's policies, regulations and CA management plans protect URV as do current municipal policies.	An additional sentence has been added to the paragraph on Urban River Valleys.	Y

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Niagara Escarpment Commission	7.2.1	The section on the Oak Ridges Moraine provides an overview of the ORMCP. However, the section on the Niagara Escarpment does not provide a similar overview of the NEP. It would be worth stating that lands within the NEP Area have been assigned one of seven land use designations (i.e., Escarpment Natural Area, Escarpment Protection Area, Escarpment Rural Area, Minor Urban Centre, Urban Area, Escarpment Recreation Area and Mineral Resource Extraction Area) based on designation criteria and the features and characteristics of the land. The NEP outlines policies for each land use designation and a list of permitted uses. Each land use designation offers varying levels of protection for Escarpment features, with Escarpment Natural, Escarpment Protection and Escarpment Rural Areas providing greatest level of overall protection. The NEC is responsible for interpreting NEP policies and land use designation boundaries. Development proposed on lands within the NEP Area, and under Development Control, is assessed to ensure that it meets the policies of the NEP.	An overview of the NEP has been added to Section 7.2.1.	Y
Niagara Escarpment Commission	7.2.1	We acknowledge that the LCP is a "living document" and that it will be amended from time-to-time. However, it may be worth noting in this section that the Greenbelt Plan, Niagara Escarpment Plan (NEP) and Oak Ridges Moraine Conservation Plan (ORMCP) will all be up for review commencing in 2015. The review of the Growth Plan for the Greater Golden Horseshoe is to commence no later than 2016. Further, the LCP may need to be revised once the review of the provincial plans has completed.	The LCP is expected to have a life-span of 10 years and will come into effect as the Greenbelt review gets under way. Therefore, noting the 2015 Review of the provincial plans would "date" the LCP. We do acknowledge that the LCP may have to be revised following the review.	N
Town of Ajax	7.2.2	Policy 7.2.4 d) and 7.5.2.2 a) only address the need for the preparation of subwatershed plans and other associated documents. If urban boundaries are proposed to be expanded without substantiation or are premature, then as a policy, TRCA should not support their consideration for the reasons noted above. (see comment 6.4).	This is the intent of the noted policies.	N

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Town of Ajax	7.2.3	Although 7.2.3 includes policies under the heading of Water Quality, it does not specifically include any policy that speaks to controlling pollution of the Lake Ontario Shoreline. Chapter 8 is also not specific in dealing with public infrastructure that may be outside of regulated areas, but drains to regulated areas or otherwise affects Lake Ontario water quality.	Water quality is addressed in the LCP through the stormwater management policies. Policies 7.4.1.1.1 a) to h) and 7.4.4.1 n), and policies 8.4 j) and 8.9.2 g) state that applications for development and infrastructure meet TRCA's stormwater management criteria for water quantity, <i>water quality</i> , erosion and water balance. With respect to the chapter 8 policies, TRCA regulates all watercourses and shorelines within its jurisdiction. TRCA cannot deal with public infrastructure outside of regulated areas, however, infrastructure constructed or outletted in a regulated area would be subject to the tests of the Regulation, and the applicable policies of the LCP.	N
Urban Forestry City of Toronto	7.2.3 and 7.3.2	While it is agreed that lands should be conveyed into public ownership as a means of controlling hazards and protecting natural features and functions, there needs to be some discussion with the municipality with respect to the procedures for implementation of these policies. In order for the City to accept hazards or natural system lands, it must have explicit Council approval of the proposed conveyance, the conveyance must meet provincial standards for soil and groundwater, and the conveyance must be financially sustainable meaning approved operational funds. There are additional operational requirements which must be addressed. For example, where TRCA takes the conveyed land, Toronto's Parks Operations is obligated to maintain under the current agreement. Where the conveyed lands are desired to go to City ownership, Parks Branch must agree to assume maintenance and there may be conditions of acceptance (fencing, clean-up, Record of Site Condition, etc.). If the conveyance is nominal and the property owner is not obligated to meet the conditions prior to conveyance, then Parks must have budget approval of operating and capital budget to make the land operational.	The conveyance policies reflect current practice and do not preclude the current processes and procedures for due diligence, management agreements, easements, etc., between TRCA and its municipal partners, from continuing.	N

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City of Markham	7.2.4	The policies in Chapter 7 are identified in the introduction as policies fulfilling TRCA's role as a commenting body to approval authorities. However, some of these policies are advocacy policies and some are policies directed not to approval authorities, but rather providing direction to TRCA staff. A good example of this is the watershed policies in Section 7.2.4. Policies a) and d) start with "to recommend" so these are clearly directed to approval authorities. Policy b) starts with "To advocate" so this policy is clearly directed to TRCA itself and as an advocacy policy, this policy would appear to be more suited to the chapter on 'advocacy' policies (Chapter 6). Policy c) starts with "To assess" so this appears to be a policy directed to the TRCA.	Chapter 7 policies represent more than just the public commenting body role, as stated in the introduction, they are also for TRCA's roles as representing the delegated public interest for natural hazards, and as a resource management agency. In correspondence to municipalities on planning and EA matters, TRCA staff will be clear in which capacity we are providing comments. The policies on watershed planning in 7.2.4 (now 7.2.5) have a clear connection to conservation authorities' roles in the planning process and therefore belong in the planning chapter.	N
Urban Forestry City of Toronto	7.2.4	(b) To advocate for, participate in, and facilitate, or lead as appropriate, the preparation and updating of watershed strategies, watershed and sub-watershed plans, and watershed report cards. This policy is not as clear as it could be/needs to be with respect to TRCA's central role. As regulator, shouldn't TRCA simply identify itself as leader/authority (over potentially disparate, cross-jurisdictional interests), in the interest of achieving effective watershed planning and controlling/mitigating cumulative impacts?	TRCA is pleased to take the lead, and have done so, for watershed plans for most of the major rivers in the jurisdiction. However, the process does not exclude other entities from leading these projects, e.g., municipalities, ENGOs. Therefore, the policy is worded to capture these possibilities.	N
York Region	7.2.4	Assessing the relevance of the watershed scale on resource management planning depends on the resource. For example, the watershed is an intuitive scale for water and related resources but not necessarily terrestrial and wildlife resources which cross drainage divides.	Comment noted.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Markham	7.2.4 e), 7.5.2.1 b), 7.5.2.2 a), 7.5.2.5 a), 8.4.6	In addition to the duplication of Special Policy Area policies we notice policy duplication in other areas of the document. For example, policy 7.2.4 e) is generally the same as Policy 7.5.2.1 b) which is also generally the same as 7.5.2.2 a). Also 7.5.2.5 a) is duplicated with 8.4.6. We note where policies are duplicated, sometimes the wording is not exactly the same. We note this issue was also raised by other agencies and the response of the TRCA is to retain the duplication. Since the policies are not always exactly the same, the TRCA may need to revise the manner in which comments are provided to municipalities by noting specific policy references so that it is clear to municipalities if the direction is advisory or regulatory.	We acknowledge that there is duplication in chapters 7 and 8 policies (see previous response regarding permit-only applications) and maintain that this is necessary to be consistent between TRCA's roles in the planning and EA processes and the permit process (in keeping with Provincial direction). However, to reduce duplication within chapter 7, we have eliminated i) from policy 7.2.5 e) (previously 7.2.4) given that it is already stated in policies 7.5.2.1 b) and 7.5.2.2 a).	Y
Township of Uxbridge	7.3	The LCP clearly recognizes that in planning matters it is the municipality which is the approval authority. The only concern is with the policies in Section 7.3 Environmental Protection Policies. While the preamble of Section 7.3.1 states that "the limits of the Natural System adjacent to development are finalized by the municipality through the planning approval process", the LCP then goes on to provide very specific direction throughout Section 7.3 as to what the TRCA considers necessary to protect, restore and enhance the Natural System. These directions may or may not be matters the municipality considers appropriate. For instance the Natural System as set out in the LCP is to be comprised among other components of "any associated potential natural cover and/or buffers". Later in Section 7.3.1.4 the LCP states that "all areas of potential natural cover be protected for restoration and enhancement, in accordance with the Natural System policies in Section 7.3.1." Potential natural cover is defined as "land within the target natural heritage system that is not existing natural cover, but is needed to achieve the TRCA's targets for regional biodiversity and the long term health of the Natural System."(Section 7.3.1.4) The target system is the system established by the TRCA not the system established by the municipality.	While it is true that the target system is the system established by TRCA through the TNHSS, that system was developed on a regional scale and is meant to be applied and refined at the time development limits are being established through the planning process. The Natural System policy 7.3.1 e) is clear about this, containing a list of information needed to identify the System in consultation with the municipality - the first being natural heritage system policies and mapping from municipal official plans.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Township of Uxbridge	7.3, 7.4.4.1.2 and 7.5.2.2	To ensure that the approach in the preamble is clearly recognized in the policies, it is recommended that the wording of the policies in Section 7.3 be clarified that it is the policy of the TRCA to recommend these matters. It is therefore suggested that wherever the phrase "it is the policy of TRCA" is found that it be followed by the phrase "to recommend".	The phrase "It is the policy of TRCA" is appropriate since this is TRCA's policy document, to be approved by TRCA's Board. The general nature of the phrase, "It is the policy of TRCA" is intentional, given that for many policies in Section 7, there may be inherent, one, two, or more of TRCA's roles, i.e., public commenting body, resource management agency, service provider, delegated provincial interest, landowner. However, we have added the conservation authority roles (as outlined in the CALC chapter) under the headings for each policy chapter as a further reminder of the weight of the policies between chapters and within each chapter. The existing text boxes on how the policies will be used in each chapter, also indicate the roles represented in the policies.	Y
City of Toronto (zoning by-law and environmental planning)	7.3.1	The draft LCP recognizes environmentally significant areas identified through TRCA'S program; however, some municipalities also have programs to identify similar areas of local and regional significance, usually in consultation with TRCA. The City of Toronto's Official Plan currently identifies 18 environmentally significant areas and we are in the process of designating a further 68. The proposed amendment is coming forward for public consultation in November 2014 and final report in 2015. For additional information, please refer to the following link.	We have amended the glossary definition of ESAs to include any municipal programs.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	7.3.1	Natural System Refinement and Implementation — under TRCA's section, the Terrestrial Natural Heritage System Strategy is identified, and it is noted that "it is anticipated to be incorporated into OPs". TRCA and CVC have recently completed developing a Natural Heritage System for Brampton as part of the City's preparation of the Natural Heritage and Environmental Management Strategy. This CA partnership and 'regularization' of two NHS models has been a unique accomplishment that is appreciated by the City. We understand that a similar approach will be undertaken to develop a NHS for the Region of Peel. Therefore we would suggest recognizing this future opportunity / collaboration wherein TRCA (in collaboration with other CAs where appropriate) may develop municipal NHS. This may be most appropriately provided as a sidebar text box.	This collaboration with municipal partners is already expressed in policy 7.3.1 g), however, in order to address your comment more specifically, we have added "neighbouring conservation authorities, where appropriate".	Y
City of Brampton	7.3.1	Page 7-14 — paragraph 2 — sentence 2 - may wish to revise to indicate "TRCA is in no way " in order to be a complete sentence. However, the City feels that this paragraph is unnecessary as this document in describing TRCA's various roles provides foreknowledge that TRCA can also act independently in planning matters as it relates to the OMB.	Typo has been corrected - thank you. Staff feel this paragraph is needed given that TRCA's role in the context of the Ontario Municipal Board is not described in the LCP section on legislation and roles (Chapter 3).	Y
City of Markham	7.3.1	We continue to find the TRCA approach of describing a TRCA based 'Natural System' and providing a policy framework around this confusing, given that the authority to delineate and protect a Natural Heritage System is a municipal responsibility and implemented through municipal Official Plans. The TRCA approach is solely to address the implementation of the TRCA Natural System which is not the same as the systems developed by municipalities and implemented through statutory Official Plans. As such, the policies direct TRCA to provide input to municipalities on their unmapped Natural System, rather than supporting municipal Natural Heritage Systems. We do not find this section easy to interpret and feel that the approach undertaken by TRCA to provide advice to municipalities based on the TRCA Natural System, rather than approved municipal Natural Heritage Systems will be challenging to interpret and implement.	The policies have been written to reflect current practice. The authority to delineate and protect an NHS is with the municipality, but that delineation is informed by technical information provided by conservation authorities, such as TRCA's TNHSS. The information from the TNHSS is routinely used by municipalities in building their own natural heritage systems for designation in their OPs (see policy 7.3.1 g)). Also, policy 7.3.1 e) states that the Natural System be determined in consultation with the municipality identified through the policies and schedules in their OPs.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Markham	7.3.1	There should be a clear policy identifying how the TRCA's Natural System, as a tool, is used to help inform local natural heritage systems implemented through local Official Plans.	This is policy 7.3.1 g) and is also described in the preamble to 7.3.1 (Natural System Refinement and Implementation).	N
City of Markham	7.3.1	It should be clear that municipalities are not refining/finalizing TRCA's Natural System but refining their own Natural Heritage Systems based on TRCA input, Provincial and Regional policy and local priorities.	See response above.	N
City of Markham	7.3.1	The Natural System policies would be stronger if they were more integrated with the delineation and protection of local natural heritage systems. We note that several municipalities have also raised the same issue with respect to the Natural System policies and in response TRCA has acknowledged the municipalities are the approval authority. While this is helpful, the lack of policy alignment with municipal natural heritage systems by continued policy reference to the TRCA's 'Natural System' does not provide the force and strength of consolidated and supported policies for a single natural heritage system.	TRCA's natural systems approach is aligned with Provincial direction (as municipal systems must be), as stated in the preamble for 7.3.1 (Consistency with Provincial Direction paragraph).	N
City of Markham	7.3.1	TRCA has described Section 7.3.1 as 'the process for defining the Natural System'. We note that we interpret these policies to address the refinement of the TRCA Natural System, not local municipal natural heritage systems as local natural heritage systems are only one component of the Natural System.	Comment noted.	N
City of Markham	7.3.1 b)	It is unusual to provide such detailed and specific policies (ie 7.3.1 b "that development and site alteration not be permitted in the Natural System") without the benefit of a mapping to support the policy and provide clearer direction. We feel that without mapping there is not enough direction to apply certain specific policies.	These policies are the general prohibitions but subsequent policies provide exceptions to these. The Natural System is described and defined throughout the document and the policies reflect how its limits are refined throughout the planning process through field work and studies in accordance with current practice. As stated in the preamble of 7.3.1, implementation of the TNHSS is not meant for a jurisdiction-wide scale, but refined in conjunction with watershed or subwatershed plans, official plan studies, and the more detailed studies conducted through EAs, MESP's and subdivision applications.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Durham Region	7.3.1 d)	This policy includes "alterations to existing development" as a permitted use in the Natural System. It should be clarified that alterations to existing agricultural uses are permitted within the Natural System.	This has been clarified in the policy.	Y
City of Markham	7.3.1 e)	Policy 7.3.1 e). If this policy is intended to direct how the TRCA will provide advice to approval agencies on the confirmation of natural heritage boundaries, then it must direct the process to confirming local natural heritage systems as defined in Official Plans, not the TRCA's Natural System as this is not recognized by local municipalities.	Policy 7.3.1 e) does include municipal official plans as the first basis for determining Natural System boundaries.	N
York Region	7.3.1.1b)	Clearly separate the legislatively required and mandated responsibilities from the policies which provide value-added services.	Comment unclear.	N
Ministry of Natural Resources and Forestry	7.3.1.2 a)	The definition does not include alvars, sand barrens, savannahs, tall grass prairies and perhaps kettle lakes and seepage areas and springs (which are included as KNHF in the ORMCP and /or in the Greenbelt Plan).	Policy 7.3.1.2 a) has been amended to include "key natural heritage features as per provincial plans." As well, in the corresponding water resources policy, 7.3.1.1 a), we have added "hydrologically sensitive features as per provincial plans."	Y
City of Markham	7.3.1.2 c)	There are also policies for lands outside of the Natural System (Policy 7.3.1.2 c) which again we cannot determine where these might apply.	Policy 7.3.1.2 c) has been modified to be more clear.	Y
City of Markham	7.3.1.2 c)	The new preamble in red on page 7-14 should be reworded. "Ultimately, the limits of the Natural System adjacent to development are finalized by the municipality" should be revised to "Ultimately, the limits of the TRCA's Natural System is interpreted and established by local municipalities in accordance with Official Plan policies through the planning approvals process."	This is already captured in policy 7.3.1 e).	N
Town of Richmond Hill	7.3.1.2 c)	While it is agreed that "isolated features are physically disconnected from the Natural System," they are still part of the Natural System. We therefore still feel that this comment should be addressed and suggest that the issue could easily be resolved by rewording Policy 7.3.1.2 to read "That all isolated natural features be assessed..."	Policy 7.3.1.2 c) has been modified to be more clear.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	7.3.1.3	The LCP recognizes Buffers to be established from natural hazards and features, that buffers will include the erosion hazard allowance, and 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 including LIDs to maintain water balance, or recreational trails. Therefore, whether in text and/or policy, TRCA should recognize this dilemma and whether these uses in buffers are appropriate or permissible, and/or there is a need to increase buffer requirements and/or to define a `setback' to address other uses within the vicinity of environmental buffers such as LID infrastructure, trails, etc.	Policies 7.4.4.1.3 e) and 8.9.10 provide flexibility for locating SWM facilities inside the Natural System subject to certain provisions. For trails, policies 7.4.5.1 c) and h) and 8.10.5 permit trails in the Natural System subject to certain provisions, and provided they can meet the definition of "minor recreational use".	N
Town of Ajax	7.3.1.4	The Town's efforts in continuing to advocate for a 30 metre buffer could be undermined by TRCA policies that allow for a 10 metre buffer.	We appreciate the Town's advocacy in this regard given that Ajax is one of few municipalities in the jurisdiction that requires the same buffer on <i>all</i> wetlands. The LCP places a preference on achieving "potential natural cover" to protect, maintain and enhance features based on a systems approach, which would likely result in a greater than 10-metre protection zone from the edge of a wetland (see policy 7.3.1.4 a)). In addition, the 10 metres in policy 7.3.1.4 b) is a minimum for "other wetlands" (not on the ORM and not PSWs where the minimum is 30m) and, as stated, acknowledges municipal buffer requirements which may be greater.	N
Urban Forestry City of Toronto	7.3.1.4	These policies complement the City's Ravine & Natural Feature Protection bylaw, itself set up under OP policies to protect the city's natural features and provide them with room to thrive. TRCA's policies will provide a useful resource for the City in convincing private landowners to restore and enhance lands adjacent to existing protected features.	Comment noted and appreciated.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
York Region	7.3.2 a)	York Region staff support the conveyance of land considered part of the Natural Heritage System from private ownership where the TRCA is better equipped to protect the lands. However, while it is understood that this policy is directed to private landowners/developers, the Region would like to ensure that where the Region is the landowner and the land is required for infrastructure improvements that the land remains under the public ownership of the Region.	Public ownership is not specific to TRCA as stated in the preamble for 7.3.2. The policies reflect current practice and do not preclude the current processes and procedures for management agreements, easements, etc., between TRCA and its municipal partners, from continuing.	N
City of Brampton	7.4.1.1	Stormwater Management — given current extreme weather events that have been responsible for urban flood management issues, e.g. basement flooding, etc. we would encourage TRCA to identify this issue within the document, and your role in identifying problems, opportunities and solutions. This may be in the form of text box.	A text box on urban flooding has been added to Section 7.4.1.1.	Y
York Region	7.4.1.1	York Region staff support policies related to Low Impact Development (LID) in Section 7.4.1.1 as this supports our water conservation program objectives and the impacts of large storms. LID can also reduce potable water needed to irrigate landscapes.	Comment noted.	N
City of Markham	7.4.1.1.1	The City has an agreement with the TRCA relating to the screening of applications including stormwater management applications. The preamble should identify that the types of applications that are screened outside of the TRCA regulatory area are dealt with through agreements with municipalities.	All of the policies of chapter 7 in the LCP are applied to applications screened in accordance with our Memorandums of Understanding. Procedural aspects of our review are described in the Planning and Development Procedural Manual.	N
Durham Region	7.4.1.1.1	This policy recommends that all infrastructure meet TRCA's storm water management criteria. It is suggested that there should be a minimum threshold of road widening which triggers the requirements to meet the policy. For instance, it does not seem reasonable or practical to bring an entire segment of road into compliance with the LCP where a right turn lane or a bus bay is added to an existing road segment. In addition, the limits of the existing road segment should be defined in the LCP. Currently, it is unclear if the policy is referring to the limits of construction, or the entire drainage area within which the minor road widening occurs.	Policies 7.4.1.1.1 a) and d) have been modified to emphasize that scoping of technical reports with TRCA staff should take place, which would prescribe the appropriate level of detail according to the scale and implications of a project. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policy refers: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document speaks to scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Peel Region	7.4.1.1.1	The need for all infrastructure to meet TRCA's stormwater management criteria as suggested in the policy may not be practical especially when road infrastructure projects are being considered. For example, it would be beneficial if there is some acknowledgement on the part of the TRCA that some capital projects require a certain degree of flexibility for unique cases that would benefit from working cooperatively with the TRCA to develop solutions that recognize site specific constraints.	Policies 7.4.1.1.1 a) and d) have been modified to emphasize that scoping of technical reports with TRCA staff should take place, which would prescribe the appropriate level of detail according to the scale and implications of a project. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policy refers: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document speaks to scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y
City of Brampton	7.4.1.1.1 a)	Please note that the terms development and site alteration, infrastructure, and recreational use have been asterisked however, that qualification has been deleted in the tracked changes.	The asterisks and the associated qualification were all deleted in the May 2014 track changes version, but the strikethrough line falls beneath the asterisk, making it difficult to tell that they've been deleted.	N
City of Markham	7.4.1.1.1 b)	7.4.1.1 b). The application of stormwater management criteria is not applied at all stages of the planning and development process. The high level processes including official plan amendments and the final stage implementation processes including zoning by-law amendments do not include detailed stormwater management considerations. More flexibility should be provided in this policy.	Policies 7.4.1.1.1 a) and d) have been modified to emphasize that scoping of technical reports with TRCA staff should take place, which would prescribe the appropriate level of detail according to the scale and implications of a project. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policy refers: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document speaks to scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y
York Region	7.4.1.2	It was recommended in the previous Regional submission that Regional and Local Official Plan policies be acknowledged in this section to bring awareness to potential developers, consultants and business owners. This change as not been made, York Region staff would like to reiterate the importance of this and request this change be made in the next iteration of the Living City Policies.	The change was made in the May 2014 version of the LCP and shows up in track changes in the second paragraph of 7.4.1.2, last sentence.	N
Ministry of Natural Resources and Forestry	7.4.2.1 a) v)	The requisite EIS should be "to the satisfaction of the TRCA". EISs should be required to meet the criteria of the TRCA, not just be submitted.	The text has been amended to address.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Markham	7.4.2.1 a) v)	We have found policies throughout the document that provide specific direction relative to a TRCA guideline or standard but do not reference the comparable and complementary standards at the municipal level that must also be considered. An example is policy 7.4.2.iv) which directs the preparation of an Environmental Impact Statement in accordance with Provincial and TRCA standards but does not mention City standards. Markham policies require not only the EIS studies be approved by the City, but also the approval of the Terms of Reference for EIS documents. The policies which fail to identify the municipal obligation and interest in a matter can be misleading. In the instances, where TRCA have cited only their guideline or standard where municipal standards also apply, we suggest an additional statement 'in consultation with municipalities' be added. We feel the LCP could be a stronger and clearer document if the policies were written to reflect more of a partnership between the TRCA and municipalities in managing development and planning approvals by also identifying and reflecting the comparable municipal guidelines and standards that require consideration in the planning approvals process.	The first condition of a reduced buffer in 7.4.2.1 a) is that the reduction is subject to municipal requirements. However, with regard to EISs in 7.4.2.1 a) v), the wording "and any applicable municipal standards" has been added.	Y
City of Markham	7.4.2.1 a) v)	7.4.2.1a) v) EIS documents must also be submitted in accordance with municipal standards and requirements. There are many other policies that do not reference the municipal role or consideration of standards and guidelines.	We have inserted municipal standards for EISs into Policy 7.4.2.1.	Y
Niagara Escarpment Commission	7.4.2.1 c)	7.4.2.1 c) – The response table suggests that this policy has been amended to include the text “provincial requirements” but we note that this does not appear to be the case in the latest version of the LCP.	The response table should have referred to policy 7.4.2.1 d) which includes the text "provincial requirements".	N
Durham Region	7.4.2.1 c) and d)	These policies recommend that where an infrastructure project cannot fully protect a natural feature that compensation for lost ecosystem services be provided. The LCP also notes that the TRCA's Compensation Protocol is not yet complete. While the Region does not object to the general concept of compensation, we cannot fully support the inclusion of the compensation provisions within the LCP until more details on the Compensation Protocol are provided.	The compensation policies are general and do not specifically reference the Protocol. The policies reflect current practice as a recommendation to the approval authority. The Protocol is intended to formalize procedures and standards and will be consulted on with stakeholders prior to TRCA endorsement.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Peel Region	7.4.2.1 d)	Regional staff would also like to reiterate the need for TRCA to finalize after consultation with stakeholders, the proposed Compensation Protocol that would provide guidance on how mitigation losses to natural heritage features would be compensated.	Comment noted.	N
Town of Richmond Hill	7.4.2.1 f)	The document does not contain any discussion or policies specifically related to the management of invasive species. The response is that Policy 7.4.2.1 f) speaks to this. Policy 7.4.2.1 f) is "To recommend a natural approach to landscaping of adjacent lands through the use of native, non-invasive and locally appropriate species." Our comment was intended to speak to the need more for a broader, overarching policy with regard to invasive species and perhaps a policy encouraging management measures to control them. Specifically, we were looking for a policy encouraging invasive species management within natural areas as a potential mitigation measure associated with development proposals.	Research is still ongoing for informing any other policies or guidelines for controlling existing invasive species. TRCA undertakes many initiatives to help address the issue through stewardship and education, actively removing invasive species in priority areas, and working with such partners as MNRF and the Ontario Invasive Plant Council. Also, TRCA has established a working group which is assessing management methods and developing an invasive species strategy that will include Best Management Practices. The outcome of this research will be incorporated into the updated Planning and Development Procedural Manual, which supports the implementation of the LCP.	N
City of Markham	7.4.3.2.4 a)	For a reader who might not be that familiar with Special Policy Areas it is not clear that a Special Policy Area designation is a tool used by municipalities to identify a flood plain area meeting very specific criteria. Perhaps policy 7.4.3.2.4.a) should read "applied to existing flood prone communities, or portions thereof, through local municipal Official Plans, where approved..."	The description of SPAs in the preamble for 7.4.3.2 states that, "Application of Special Policy Area requires the approval of the Province...and suitable policies and standards must be incorporated into the member municipality's official plan and zoning regulations." In addition, policies 7.4.3.2.4 b) to e) refer to official plan policies and Appendix B contains the site-specific SPA policies.	N
City of Markham	7.4.3.2.4 d)	7.4.3.2.4 d). Remove the word 'provincially' as the province does not approve the policies. The Region of York is the approval authority and they obtain a sign off or authorization from the Province.	The approval process in this policy is consistent with Section 3.1.4 of the PPS 2014.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Markham	7.4.3.2.4 e) and 8.5.3.4	The Special Policy Area policies are located in both Chapter 7 (advisory) and Chapter 8 (directive). Advisory Policy 7.4.3.2.4 e) appears to reflect the same intent of regulation Policy 8.5.3.4, except the regulation policy speaks to new and intensified development, while policy 7.4.3.2.4 e) speaks to development and site alteration. We find it very confusing to have these policies located in different chapters that reflect a different level of obligation.	Chapter 7 uses the language of the Provincial Policy Statement, while Chapter 8 uses the language of TRCA's Regulation. Policy 7.4.3.2.4 d) can be equated to policy 8.5.3.4, while policy 7.4.3.2.4 e) can be equated with policy 8.5.3.2. The duplication of the policies in both chapters is needed in case an application for development does not require a <i>Planning Act</i> approval yet still requires a TRCA permit or TRCA clearance (e.g., building permit).	N
Durham Region	7.4.4.1	Policy 7.4.4.1 n) recommends that infrastructure projects meet all of TRCA's stormwater management criteria, including water balance. Water balance assessments in a road project should not be considered in isolation, conversely they should be considered on a watershed or subwatershed basis.	Guidance on water balance assessment is in TRCA's SWM Criteria document and takes a catchment-based/subwatershed approach; for smaller road projects, see Section 2.1 of the SWM Criteria document as described in the response to the Region's comment on section 7.4.1.1.1 of the LCP.	N
York Region	7.4.4.1	Request further clarification on the terms "cumulative" and "compensation". Policies related to cumulative impact should provide context (scale and scope analysis required for cumulative impact assessments relative to scale of proposed work). Regional staff request continued involvement in the development of TRCA's compensation protocol.	Direction on the consideration of cumulative impacts is found in objectives, policies, and a definition in the LCP. For example, policies 7.2.5 a) and c), and the glossary definition of cumulative impact provide context and scale for which cumulative impacts are to be considered in (watershed/subwatershed/ shoreline reach), by TRCA staff. The term is also in the objectives in 7.4.4.1, which reflect the intent of the policies in 7.4.4.1. For instance, minimizing the number of infrastructure projects within a subwatershed or corridor reach (7.4.4.1 j)) is a measure for reducing (or mitigating for) cumulative impacts. TRCA staff will endeavour to achieve this minimization in considering planning and permit applications contemplating crossings within the same valley/stream corridor or shoreline reach. TRCA will continue to involve York Region in any technical advisory committee meetings on the development of the Compensation Protocol.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Durham Region	7.4.4.1 c)	Policy 7.4.4.1 c) recommends that linear infrastructure should generally cross perpendicular to the Natural System and its most narrow point. There are many factors that must be considered when determining the alignment of a road. Crossing perpendicular to a natural feature at its narrowest point is one such factor. Other factors include: sight lines, horizontal and vertical alignment, grading, driver and pedestrian safety, etc. All of these important factors must be given due consideration.	Agreed, however, the policy already includes the word "generally" to allow flexibility for other constraints.	N
Durham Region	7.4.4.1 l) and m)	Policies 7.4.4.1 l) & m) make reference to compensation. Please refer to previous comments under natural features and areas management policies.	The compensation policies are general and do not specifically reference the Protocol. The policies reflect current practice as a recommendation to the approval authority. The Protocol is intended to formalize procedures and standards and will be consulted on with stakeholders prior to TRCA endorsement.	N
Durham Region	7.4.4.1 o)	Policy 7.4.4.1 o) recommends that infrastructure projects on TRCA-owned lands be avoided. Environmental Assessments should recommend the solution that best addresses the problem or opportunity while minimizing the impacts on the natural, social and economic environments. Solutions should not be predetermined or significantly influenced by the ownership of land.	Comment noted. The policy states that where use of our land is the only option for complying with the environmental policies of the LCP, then it may be considered.	N
City of Markham	7.4.4.1.2 c)	7.4.4.1.2.c) Need more flexibility in this policy to address road widenings.	Policy 7.4.4.1.2 c) has been modified to enhance clarity by incorporating the word "adjacent". As well, Policies 7.4.1.1.1 a) and d) have been modified to emphasize that scoping of technical reports with TRCA staff should take place, which would prescribe the appropriate level of detail according to the scale and implications of a project. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policies refer: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document speaks to scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Durham Region	7.4.4.1.2 c)	This policy recommends that for road widenings the surface area of both the existing road and the new road portion meet TRCA stormwater management criteria. Similar to our comments regarding Stormwater Management, it is suggested that there be a minimum threshold of road widening which triggers the requirement to meet this policy. For instance, it does not seem reasonable or practical to bring an entire segment of road into compliance where a right turn lane or bus bay is added.	Policy 7.4.4.1.2 c) has been modified to enhance clarity by incorporating the word "adjacent". As well, Policies 7.4.1.1.1 a) and d) have been modified to emphasize that scoping of technical reports with TRCA staff should take place, which would prescribe the appropriate level of detail according to the scale and implications of a project. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policies refer: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document speaks to scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y
Urban Forestry City of Toronto	7.4.5	The policies in this section are supported by UF.	Comment noted and appreciated.	N
Peel Region	7.4.5.1 g)	One important observation (despite it being referenced in Sections 6.6 and 7.2.1 d of the Living City policies) is that there seems to be a greater emphasis on near urban agriculture and agriculture on TRCA owned lands as opposed to treating agriculture as an important land use and sector throughout TRCA's jurisdiction. For example, there is continued reference to agriculture on non-TRCA owned lands under policies for recreational use (Section 7.4.5.1 g). It is anticipated that there will be continued dialogue with agricultural stakeholders within TRCA's jurisdiction to provide greater clarity on how the policies will be supportive to the agricultural community.	Both drafts of the LCP were circulated to a wide breadth of stakeholders including agricultural groups from across TRCA watersheds. The fact that agriculture in general is an important land use and sector throughout TRCA's jurisdiction is captured in 6.6 and 7.2.1's Protected Countryside preamble. In 6.6, the description of near-urban agriculture includes farming on rural lands in proximity to cities (describing the outer reaches of rural lands in TRCA's jurisdiction) and doesn't just refer to farming within urban areas. However, an additional section on agriculture has been added to the Landscapes section (7.2.2) of the LCP to further recognize that the agricultural community is a key partner in achieving watershed health.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	7.4.5.1 k)	Previously subsection (i), this policy has been modified to require that major/minor recreational uses meet TRCA's SWM criteria where appropriate without the qualification that this applies to impervious surfaces. This seems very open-ended and may lead to confusion. Within the Response Comments, there is no indication why this policy was modified. The City was content when the policy identified the SWM criteria was applicable to impervious surfaces but we are concerned with the potential implications as currently written.	In the previous round of comments, another stakeholder's comment (under policy 7.4.1.1.1) stated that development or site alteration may not involve the conversion to an impervious surface but may still alter the runoff coefficient. In response, the qualification was removed in order to capture all instances where the water cycle would be altered. However, TRCA's SWM Criteria document, to which the policies (7.4.1.1.1 and 7.4.5.1 k) refer, contains a section on scoping of SWM review based on the scale of a project (2.1).	N
City of Markham	7.5.2 d)	* 7.5.2 d). The tests are 'be consistent' with the Provincial Policy Statement and 'conform with' Provincial Plans .	This text has been changed to reflect.	Y
City of Markham	7.5.2.2 a)	* 7.5.2.2. a). An urban boundary expansion would fall under the category of Official Plan or Official Plan Amendment and does not need to be separately noted. We cannot think of a situation of an urban boundary expansion that would not be part of an amendment process.	Accordingly, the text has been changed to "including" urban boundary expansions.	Y
Town of Ajax	7.5.2.2 b)	Although true (see previous Ajax comment and TRCA response), the TRCA has a strong ability to influence outcomes. In this respect, staff suggest that the policy be revised to state that the TRCA not support any official plan amendment to expand a municipal urban boundary until the appropriate watershed or subwatershed plans have been completed.	This is the recommendation to approval authorities in policy 7.2.5 d).	N
Ministry of Natural Resources and Forestry	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"? Rationale noted – statement appears to have been removed from this version.	The phrase has been deleted.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Peel Region	7.5.2.3	For consistency with Peel's direction to "improve storm water management" and a current focus to manage stormwater generated within regional roads right of way (ROW), it is suggested that Section 7.5.2.3 have a guideline that speaks to local area municipalities including storm drainage from regional roads (ultimate width) in the development of Master Environmental Servicing Plans (MESP). This will result in the need for fewer stormwater facilities which in the long term will reduce the capital and operating maintenance costs for both the respective municipality and the Region. This direction was endorsed by Peel Council on May 8, 2014 in support of Term of Council Priority (ToCP) No. 4 related to improvement in stormwater management.	A policy has been added to the SWM policies in the LCP in this regard - see 7.4.1.1.1 h).	Y
Town of Ajax	7.5.2.3	It is noted that 7.5.2.3 b) is proposed to be removed. The policy should articulate that an MESP would not be supported by the TRCA unless the criteria within 7.5.2.3 a) have been satisfied.	Policies 7.5.2.3 a) through d) were revised to be more clear but still stipulate that the Terms of Reference for an MESP address TRCA Standards, prior to the municipality's approval of the Terms of Reference (see 7.5.2.3 a)).	N
Urban Forestry City of Toronto	7.5.2.4	UF agrees with Policy a), that natural areas not be zoned for development and should not form part of the lots being created or developed. It would be helpful for Policy b) to indicate that a new lot should not be created/developed adjacent to the natural system unless it includes suitable outdoor amenity space outside of the natural system. This could help alleviate impacts to retained natural resources where inadequate outdoor amenity space is provided.	The policy has been revised to include sufficient space for amenity areas.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	7.5.2.5	We appreciate TRCA's explanation for the provision of this policy to ensure consistency between planning recommendations and permit policies as it relates to existing vacant lots. We would note that this is likely one of the most restrictive policies in the LCP document that could potentially conflict municipal zoning with typical exemptions for existing lots of record found in official plans, as well provincial plans such as the Greenbelt Plan. Therefore, we would recommend adding an explanation whether within the policy and/or a text box that aids the reader in understanding that the rationale for this restrictive policy comes from provincial hazard policies/direction, and has been the standard practice of TRCA since the VCSMP.	A paragraph has been added as a preamble to these policies in chapter 7. Indeed, these policies are an expression of current practice, carried forward from the VSCMP.	Y
Township of King	7.5.2.5	Existing Vacant Lots of Record is more restrictive than the Oak Ridges Moraine Conservation Plan policies for existing uses, buildings and structures (6.(1)), and previously authorized single dwelling (7.(1)). In general, King's official plan documents and zoning by-law have incorporated closely the policies of the ORMCP in this regard.	A paragraph has been added as a preamble to these policies in chapter 7 that explains the rationale. These policies are an expression of current practice, carried forward from the VSCMP.	Y
Urban Forestry City of Toronto	7.5.2.6 7.5.2.7	The policies in these sections are supported by UF.	Comment noted and appreciated.	N
City of Brampton	8.2.1	COB asked for clarification of 'other areas' as related to Bullet 6 and the Response Comments noted including a link to Appendix C; however, this has not been provided. This section notes Appendix A which appears to be incorrect.	This has been corrected to refer to Appendix C; links will be available in the final on-line version of the LCP.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	8.2.2	— there are two definitions of development in this document — the Planning Act and CA Regulations. The PA definition specifically excludes infrastructure and the CA Regulations includes 'structures' which can be interpreted to include infrastructure (i.e. Sec. 8.9 specifically addresses infrastructure). The City has no issue with regard to Sec. 8.9 policies; however, we are concerned with all of the general policies that include restrictions on 'structures' and how this may create confusion for the reader. We would recommend creating clarity by including a text box in this section that would read: "TRCA Regulations apply to road infrastructure including bridges and culverts that are often referred to as structures. All policies related to infrastructure are found in Sec. 8.9, Infrastructure. Elsewhere in Sec. 8.0, the term 'structures' is used with regard to construction associated with buildings and facilities."	Infrastructure policies are primarily in Section 8.9, however, there are also other policies in Section 8 that refer to infrastructure, e.g., 8.7.4. We feel there is sufficient context within the policies when the term "structure" is used.	N
City of Brampton	8.2.3	Paragraph 1, sentence 1 — revise to indicate " ... will not be adversely affected".	This wording comes directly from the Regulation.	N
York Region	8.4.2 and 8.4.3	There are multiple 'notwithstanding' clauses in the first several sections of 8.4 making it difficult to determine what is truly allowed/prohibited. TRCA's response to this comment made in the previous regional submission points us to another section in the document. It is recommended that TRCA simplify/clarify requirements in the individual sections.	We have rearranged the order of the policies in this section so that the most restrictive policies come first, eliminating the need for some of the "notwithstanding" clauses.	Y
Town of Caledon	8.4.7	For reasons of clarity, please consider incorporating the TRCA's responses to the following Caledon comments directly in the body of the LCP document: 8.4.7	The response provides background information for the development of the LCP and is not appropriate for the policy document.	N
Town of Ajax	8.4.7, 8.7.3 8.7.6	It appears that 8.4.7 d) has been removed. As noted earlier, the Town's efforts in continuing to advocate for a 30 metre buffer could be undermined by TRCA policies that allow for a 10 metre buffer.	We appreciate the Town's advocacy in this regard. As stated, policy 7.3.1.4 b) accounts for municipal buffer requirements that may be greater. The policies reflect current practice for both highly urbanized as well as urbanizing municipalities throughout TRCA's jurisdiction.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
City of Brampton	8.4.8 c)	The addition to this sub-policy is awkward particularly as the preamble denotes that TRCA must be satisfied. Therefore, the City recommends revising preamble to indicate "where TRCA determines it to be appropriate, and where appropriate based on the results of comprehensive environmental study or technical report, the following have been demonstrated to the satisfaction of TRCA".	The phrase has been deleted in order to eliminate the repetition.	Y
Ministry of Natural Resources and Forestry	8.4.12	General comment: underground parking facilities in a floodplain should always be discouraged.	Comment noted.	N
Town of Caledon	8.5.1.3	For reasons of clarity, please consider incorporating the TRCA's responses to the following Caledon comments directly in the body of the LCP document: 8.5.1.3	This is background information not needed for the policy document. A synopsis of the rationale is already provided in the text box under the LCP section on Ground Floor Additions.	N
Ministry of Natural Resources and Forestry	8.5.1.10 c)	There is a concern that policy 8.5.1.10 c) may not be consistent with the Provincial Policy Statement. Where the one-zone approach is used, development is required to meet the one-zone policy. Perhaps "development" needs to be more finely defined in this section.	Another provision has been added to this policy to reference the One-Zone policies.	Y
City of Brampton	8.6.1.2	Urban municipalities are required to recognize and facilitate "Second Units" as directed by the province. In many instances, second units are created through basement apartments. As such, we recommend that TRCA provide a specific policy that qualifies that no 'additional dwelling unit' shall be permitted within the Regulatory Storm floodplain, to provide greater clarity than the manner in which Sec. 8.6.1.2 is currently written.	Comment unclear. There is no Section 8.6.1.2. For the section on development in flood hazards (8.5.1 and 8.6.9), the policies state that there shall be no increase in the number of dwelling units in the Regional Storm Flood Plain (in a One-Zone) and no basement.	N
Town of Caledon	8.6.13	For reasons of clarity, please consider incorporating the TRCA's responses to the following Caledon comments directly in the body of the LCP document: 8.6.13	This technical information is in TRCA's Planning and Development Procedural Manual and is not needed in the policy document.	N
Ministry of Natural Resources and Forestry	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? Rationale noted and it is assumed that water balance would be considered as well.	Yes, water balance is one of the criteria that must be addressed for stormwater management.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Ministry of Natural Resources and Forestry	8.7.2, 8.7.3, 8.7.6 and 8.7.8 (and other policy sections)	There are many references to features of the Oak Ridges Moraine (ORM) but no references to the Greenbelt Plan areas (regarding buffers, setbacks etc.). It appears that the ORM has been given a greater importance in the LCP than the Greenbelt Plan. Accordingly, "Greenbelt Plan area" should be inserted where all(?) such references to the ORM are made. Comment addressed in Section 7.3.1.4 b) as it relates to Planning ("in accordance with Provincial Plans, e.g., Greenbelt Plan"); HOWEVER, this is not the case under Sections 8.7.2, 8.7.3, 8.7.6 and 8.7.8 (and other policy sections?) where only the ORM and NEP area are mentioned for the Regulations section (see ** below). Was it intentional to omit Greenbelt Plan area?	Wetlands in the Protected Countryside designation of the Greenbelt Plan are not subject to the natural system policies of the Greenbelt Plan, rather they are subject to the PPS which has protection only for provincially significant wetlands. The ORMCP and the Niagara Escarpment Plan have protection policies for all wetlands, regardless of significance.	N
York Region	8.7.4 - 8.9.2 h)	Recommend that these policies be revised to "not negatively affected" as it would be very difficult to satisfy to policy as currently written given the comprehensive definition of conservation of land. This change which was requested before has not been made (same comment for 8.9.2 h).	As in our previous response, the wording is from the legislation but is interpreted through the application of our policies, which have the intent of not negatively affecting.	N
Town of Caledon	8.7.8	For reasons of clarity, please consider incorporating the TRCA's responses to the following Caledon comments directly in the body of the LCP document: 8.7.8	This is an interpretation of, and background to, the policies that should not be included in the policy document.	N

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Ministry of Natural Resources and Forestry	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.) MNR notes that there were amendments to this section that would partially address the question; however, the question of impacts to adjacent landowners - not from a hazard perspective but rather from a setback requirement perspective - remains.	Watercourse realignments would require a buffer from the greater of the flood plain, top of bank, dripline, etc. on either side of the watercourse; the landowner would need to demonstrate that this can be achieved on their property. Any work or study areas required as part of the application, not contained on the subject property, would require adjacent land owner authorization. This requirement is captured in the Planning and Development Procedural Manual (TRCA Requirements for Planning and Permit Applications) and the permit application form.	N
York Region	8.8.4	Policy 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 de-facto prohibition of watercourse alteration. It is recommended that this section be better defined. This comment was made in the previous submission with TRCA responding that "demonstrated to the satisfaction of TRCA" allows them to be reasonable. It would be beneficial to have this level defined in the policy to provide clarity.	Policies 8.8.4 a) to i) contain the criteria for demonstrating "no impact". Any further level of detail is found in supporting technical guidelines of the Procedural Manual.	N
City of Brampton	8.9	Technical Reports — Paragraph 1, sentence 1 — replace "is required" with "may be required".	The text is already phrased as such.	N
City of Brampton	8.9.6 d)	Revise to delete "be treated to". These words are redundant.	The words "be treated" have been removed.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Durham Region	8.9.6 d)	This policy recommends that for road widenings the surface area of both the existing road and the new road portion meet TRCA stormwater management criteria. Please refer to our other comments regarding Stormwater Management and transportation infrastructure.	We have modified policy 8.9.6 e) to enhance clarity by incorporating the word "adjacent" . As well, the general infrastructure policies in Section 8.9, which would also apply here, speak to scoping of technical reports based on the scale of infrastructure projects. Also, the technical details and scoping to meet the policies are found in the supporting technical guideline to which the policies refer: TRCA's Stormwater Management Criteria document. Section 2.1 in the SWM document discusses scoping of review for smaller projects (see single lot/less than 0.5 hectare developments).	Y
York Region	8.11.2	It is recommended that TRCA consider providing a definition for receptors. It is unclear if receptors under these policies are intended to cover watercourse, wetlands etc.. Or could it be defined more broadly to include groundwater recharge and discharge areas, ESA's, all parts of TRCAs natural heritage system, etc.	Some examples of receptors have been added to 8.11.1 to enhance clarity.	Y
Town of Caledon	8.12.3	For reasons of clarity, please consider incorporating the TRCA's responses to the following Caledon comments directly in the body of the LCP document: 8.12.3	This technical information is in TRCA's Planning and Development Procedural Manual and is not needed in the policy document.	N
Niagara Escarpment Commission	Glossary	Should a definition be provided for "natural features and areas", given that this term is referenced throughout the LCP? In addition, we note that this term has been italicized in some sections of the report (e.g., pages 7-12, 7-14).	The italics have been removed given that natural features and areas is not a defined term. The PPS defines the term as those natural features and areas that are provincially significant. TRCA would include "locally" significant features and areas as well as provincially significant, so we cannot use the definition from the PPS. However, policy 7.3.1.2 a) provides a list of what could be included as natural features and areas and have qualified in the preamble to 7.3.1.2 that some natural features and areas may be found to warrant protection through field work during plan review.	Y
City of Brampton	Glossary	Cultural Heritage — please note typo of 'natural' in sentence 2	This typo has been corrected.	Y

Commenter	Section or Policy No.	Comment	TRCA Response	Revisions made to LCP?
Ministry of Natural Resources and Forestry	Glossary	It is noted that the Living City Policies document has replaced references to the PPS 2005 with PPS 2014. The Glossary, however, still uses some of the definitions of PPS 2005. It is recommended that the definitions section be updated accordingly.	This has been corrected.	Y
Ministry of Natural Resources and Forestry	Glossary	Some of the definitions only speak to the ORMCP and not the Greenbelt (e.g., Minimum Vegetation Protection Zone, Key Natural Heritage Feature). Please keep in mind that in some cases the Greenbelt Plan has broader definitions of KNHFs than does the ORMCP.	We have modified the glossary definitions of these terms accordingly.	Y
Ministry of Natural Resources and Forestry	Glossary	Under (Provincially) Significant definition item d) should be re-labelled as "c)". There is a section for criteria for determining significance in the 2014 PPS that was not transferred to this Glossary.	This has been corrected and the full definition from the PPS 2014 has been included.	Y
Urban Forestry City of Toronto	Glossary	Suggest revising to include other trees, in addition to woodland: Dripline – the downward vertical projection of the outer-most extent of tree branches of a tree, a group of trees or a woodland, and collectively, the edge of the woodland.	The definition has been revised to be more general.	Y
Ministry of Natural Resources and Forestry	Appendix A	Appendix A is referenced in Section 8.5.2.2 (and in many other places in the document) but has not been appended to the 2014 version. In its absence, I have referred to Appendix A of the original Draft; there are no Municipal Policies for SPAs and Two Zones included - only maps. The policies are of interest to MNR – especially the policies for 2-Zone. MNR&F would appreciate the opportunity to review these policies.	Comment noted. The final version of the LCP contains these policies, i.e., Provincially-approved, site specific SPA policies and agency-approved Two-Zone policies.	N