

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-1 Edited (no change to intent)	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	MOECC	C	<p><b>Prescribed Instrument</b> (PTTW Policies in <b>WHPA-Q1 with Local Areas with Quantity-related Significant Drinking-Water Quantity Threats</b>)</p> <p>Within the Tier 3 Water Budget <b>WHPA-Q1 Local Areas</b> identified as having significant water quantity threats the Ministry of Environment <b>and Climate Change</b> shall ensure each water taking threat ceases to be, or does not become significant through actions the Director considers appropriate on a case by case basis, such as:</p> <p>1) Reviewing all existing Permits To Take Water, in consultation with <b>other Ministries (as required)</b>, the Ministry of <del>Natural Resources</del> the affected municipality and relevant conservation authorities, <b>and permit holders</b>, and amend the permits where necessary to ensure:</p> <ul style="list-style-type: none"> <li>a) that municipal water supply requirements for the <b>allocated and planned quantity current and planned service capacity</b> (per the current approved population <b>and employment</b> projections of the most recent Growth Plan for the Greater Golden Horseshoe) will be met on a sustainable basis; and</li> <li><del>b) that the ecological and hydrological integrity of municipal wells in the WHPA-Q1 key hydrologic features, functions and aquatic systems in the Local Area will be maintained.</del></li> </ul> <p>2) Issuing Permits To Take Water for new or increased takings only if it can be satisfactorily demonstrated, <b>using the findings of the most recently approved Tier 3 Water Budget Model and where appropriate other available data, where appropriate</b>, using <del>Tier 3 Water Budget Model where appropriate</del> that the taking:</p> <ul style="list-style-type: none"> <li>a) can be maintained on a sustainable basis;</li> <li>b) will not affect the ability of the aquifer to meet the municipal water supply requirements for the current and planned service capacity; <del>or interfere with other permitted takings;</del> and</li> <li>c) will ensure the <del>ecological and hydrological integrity of municipal wells of key hydrologic features, functions and aquatic systems will be maintained.</del></li> </ul>	Existing & Future: <b>WHPA-Q1 with a significant risk level</b>  Future: <b>WHPA-Q1 with a moderate risk level</b>  Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	Future: Immediately (T-3)  Existing: 3 years (T-1)	GEN-5 DEM-8  See Explanatory Notes	MON-4

COMMENTS POLICY DEM-1		
	Comments	Response
York Region	The outcome of the SPC discussion around this policy was for the model and all available data to be considered in decision making. The current wording could be interpreted as requiring the model to be used always, and other data to be used 'as appropriate'. <u>Suggest rewording policy to "...using the findings of the most recently approved Tier 3 Water Budget Model and other available data, where appropriate..."</u>	Revision made.

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COMMENTS POLICY DEM-1		
	Comments	Response
<p><b>Citizens Against the Melville Pit (CAMP)</b></p>	<p>Section 1.3 notes that the CWA establishes a locally driven, science-based multi-stakeholder driven process to protect residential drinking water resources. However, the document does not appear to adequately address the potential threat(s) represented by existing and permitted (designated) aggregate operations, including aggregate recycling in the Credit River Watershed.</p> <p>Section 9.1 refers to the “prescribed instruments” or existing, regulatory tools that can “regulate” by imposing conditions on existing and or future activities. It makes specific reference to various sections in the <i>Aggregate Resources Act, 1990</i>. A series of recommendations were made by a provincial Standing Committee that recently completed a Review of the <i>Aggregate Resources Act, 1990</i>. Recommendation 28 stated that:</p> <p>“The Ministry of Natural Resources, in conjunction with the Ministry of Environment, conservation authorities, and aggregate producers, should ensure that potential cumulative impacts upon surface and groundwater resources are appropriately assessed and mitigated where warranted. Independent technical analyses should be undertaken where appropriate.”</p> <p>This recommendation emanated from concerns raised during the public hearings held by the Committee related to the potential cumulative impact of active aggregate operations upon surface and groundwater resources. The Committee was made aware of an “independent technical Report was based on a study on Cumulative Impacts for Groundwater Takings in the Carden Plain Area (September 20 12) that was commissioned by the Ontario, Stone, Sand and Gravel Association and prepared by Golder Associates Ltd.</p> <p>This study involved all local aggregate producers in this area (12 sampled quarries) and was prepared at the request of the MOE. The Carden Plain is an area of mainly limestone deposits and major aggregate production located northeast of Lake Simcoe in Simcoe County and Kawartha Lakes. The key finding of this study was that “most water quality parameters are expected to be negligible.” It is not clear whether this study was subject to a peer review and whether the noted conclusion would apply to all the environmental circumstances of all of the aggregate operations across the province.</p> <p>In 2009, Ontario’s Environment Commissioner (ECO) noted that “Ontario’s current land use planning system is weighted in favour of extractive and destructive uses of land. The ECO has recommended that the Ministry of Natural Resources’ existing commitment to consider its Statement of Environmental Values and cumulative effects during instrument decisions should apply to instruments issued under the Aggregate Resources Act.</p> <p>The Updated Approved Assessment Report: Credit Valley Source Protection Area, January 18, 2012 indicates the significance of understanding the cumulative impacts Section 4.7.5 Transport Pathways indicates the following:</p> <p><u>Gravel Pits/Aggregate Operations:</u> Aggregate operations were identified in the WHPAs of Caledon Village Well 3 and in Alton Wells 3 and 4. The aggregate operation in the WHPA of Caledon Village Well 3 consists of several pits that extend below the water table, covering an area of approximately 20 hectares. Within the footprint of the sand and gravel pits, the entire overburden layer has been removed, resulting in the opening up of the underlying overburden, and the loss of the protective layers overlying the aquifer across the gravel pit. Based on this, the vulnerability rating within the area of the gravel pits was increased from medium to high. Recommendation 28’s reference to “Where warranted” and “technical analyses as appropriate” suggests this remains a significant policy void with respect to protecting water resources.</p> <p>The Committee also made a series of recommendations supportive of the expanded use and acceptance of recycled aggregate materials. The environmental impacts of recycling activities should be considered as a potential threat to residential water resources. Groundwater used for this purpose could become contaminated by the chemicals inherent in the asphalt and concrete materials being recycled. Under existing aggregate extraction activities the Section 7.2 Transport Pathways states that “man-made transport pathways include pits, quarries, mines, road cuts, ditches, storm water, pipelines, sewers, poorly constructed wells.” As the Carden Plain report noted, quarry operations already increase concentrations of boron , iron, sulphate and chloride as a result of dewatering groundwater from quarries .The potential threat to residential water resources represented by the recycling of aggregate materials also needs to be better understood and made part of the Source Protection process.</p>	<p>If DEM-1 Part 2 is implemented as written this policy provides the tools to address the concerns raised.</p>

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DEM-2 No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Planning Approval Authority	A	<p><b>Land Use Planning</b> (Planning Policies in <b>WHPA-Q1</b> with <del>Local Areas with Quantity-related Significant Drinking Water Quantity Threats</del>)</p> <p>Within the Tier 3 Water Budget <b>WHPA-Q1</b> <del>Local Areas</del> identified as having significant water quantity threats the relevant Planning Approval Authority shall ensure water taking does not become a significant drinking water threat by:</p> <p>1) <b>Only permitting new development if the new development does not require a new or amended PTTW; or</b>  <del>Only permitting new development or site alteration that requires new or increased water takings beyond the planned future service capacity if the following applies:</del></p> <ul style="list-style-type: none"> <li><del>a) the development or site alteration is minor as determined per the Planning Approval Authority, including not requiring a new/amended PTTW; or</del></li> <li><del>b) it can be satisfactorily demonstrated that the increase in water demand can be accommodated on a sustainable basis; and</del></li> <li><del>c) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</del></li> </ul> <p>2) <b>Only providing final approval for new development that requires new or amended PTTW once the Ministry of the Environment has determined that the proposed taking does not become a significant water quantity threat ; or</b>  <del>In relation to clause 1 b) above, where it is deemed necessary to require demonstration that an increase in water demand associated with a planning application can be accommodated on a sustainable basis, require submission of a satisfactory detailed assessment, using the Tier 3 Water Budget Model where appropriate, to ensure that:</del></p> <ul style="list-style-type: none"> <li><del>a) the increased taking will not adversely impact the aquifer's ability to meet the municipal water supply requirements for current and planned service capacity, or for other permitted takings; and</del></li> <li><del>b) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</del></li> </ul> <p>3) Only approving settlement area expansions, <b>within WHPA-Q1</b> as part of a municipal comprehensive review where the applicable provincial planning criteria have been met and the following has been demonstrated:</p> <ul style="list-style-type: none"> <li>a) the aquifer has sufficient capacity to sustainably provide municipal water services to the expanded settlement area;</li> <li>b) the expansion will not adversely impact the aquifers ability to meet the municipal water supply requirements for current and planned service capacity, for other permitted takings, or for wastewater receiving bodies; and</li> <li>c) the <del>ecological and hydrological integrity of</del> <b>municipal wells will</b> <del>key hydrologic features, functions and aquatic systems</del> be maintained.</li> </ul>	<p>Existing &amp; Future: <b>WHPA-Q1 with a significant risk level</b></p> <p>Future: <b>WHPA-Q1 with a moderate risk level</b></p> <p><del>Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)</del></p>	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)</p>	<p>DEM-1 N/A</p> <p>See Explanatory Notes</p>	MON-1

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COMMENTS POLICY DEM-2		
	Comments	Response
NEC	17. New development requiring a new or amended Permit to Take Water within the NEP Area could be dealt with at such time that a Niagara Escarpment Development Permit Application was received. As noted above, NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation. The NEP currently contains development criteria related to water quality and quantity which the proposed development would need to meet. Parts 2.6.8-2.6.9 relate to identifying/mitigating the impacts of water taking on the Escarpment environment.	Comment noted.
	11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i> . However, we question whether the NEC should be listed for List A policies.	Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.
	12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.	
Halton Region and lower tier municipalities	37. This policy is redundant as under the PPS, 2014 lot creation is only permitted if there is sufficient servicing capacity – Section 1.6.6.6 Policy DEM-1 already addresses concern regarding water taking. MOE will not issue permit to take water for new development if there are negative impacts.	Noted. The Committee chose to implement a multi-layered approach to ensure the activity is addressed.
	Policy is also oddly worded by providing 3 options with the use of “or”. Also the first two parts (1 & 2) of this policy are covered off by the requirements of DEM-1.  With respect to part 3), this additional policy test for settlement boundary expansions seems unnecessary given current restrictions on settlement area expansion in the PPS, 2014 as well as more specific restrictions in the provincial plans (Greenbelt Plan, Growth Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan) that apply with the CTC watershed area Given that these broader-scale provincial plans are up for review in 2015/2016, additional criteria for settlement expansion can be better evaluated in the context of a broader provincially led public policy review.	
MHBC Planning	We have a couple concerns with the proposed revisions to DEM-2. First, DEM-1 already provides direction to the MOE for assessing PTTW applications and includes specific tests which address water quantity concerns.  Second, the policy introduces the concept of MOE reviewing Planning Act applications and providing conclusions on significant water quantity threats. The PTTW application provides the relevant technical information required for the MOE's review. We recommend that the first two sections of DEM-2 be deleted or revised in recognition of the water taking policies in DEM-1.	Noted. The Committee chose to implement a multi-layered approach to ensure the activity is addressed.  DEM-2 Part 2 MOE involvement ensures that confirmation of PTTW is noted to the applicant and required before the application proceeds to a point of ‘no return’.

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DEM-3 Revised for accuracy	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	MMAH MOI MOECC	K	<p><b>Specify Action</b> (Growth Management/Planning Ministries to Review Growth in <b>WHPA-Q1 with Significant Water Quantity Threats</b> <del>Local Areas with Quantity related Significant Drinking Water Threats</del>)</p> <p>Within any Tier 3 Water Budget <b>WHPA-Q1 Local Area</b> identified as having significant water quantity threats the Provincial Ministries specified below <del>shall</del> undertake the following to <b>ensure the provision and distribution of water supply for municipal population and employment growth forecasts does not create a new or increase an existing significant water quantity threat: ensure municipal population growth forecasts and distributions are sustainable based on available water systems:</b></p> <p>1) The <b>Ministry of Municipal Affairs and Housing</b> in consultation with the Ministry of the Environment and Climate Change and any relevant municipalities should use the Tier 3 water budget information and other data available, to ensure that municipal Official Plan growth forecasts and distributions, in consultation with the Ministry of Environment and Climate Change and relevant municipalities will not result in creating or worsening a significant water quantity threat, given water quantity constraints identified in Tier 3 Water Budget model areas; and  <del>The Ministry of Municipal Affairs and Housing shall use the Tier 3 water budget information to ensure that municipal Official Plan growth forecasts and distributions, in consultation with the Ministry of Environment and relevant municipalities will not result in creating a significant drinking water quantity threat, given water quantity constraints identified in Tier 3 Water Budget model areas; and</del></p> <p>2) The <b>Ministry of Municipal Affairs and Housing</b> <del>Ministry of Infrastructure</del> should <del>shall</del> take into consideration water quantity constraints identified through Tier 3 water budgets, <b>and other data available</b>, during its review of the population forecasts contained in the Growth Plan for the Greater Golden Horseshoe, in consultation with relevant municipalities.</p>	Existing & Future: WHPA-Q1 with a significant risk level  Future: WHPA-Q1 with a moderate risk level Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	Existing & Future: Consider within 2 years (T-15)	N/A  See Explanatory Notes	MON-4

COMMENTS POLICY DEM-3	
Comments	Response
OGS	We would like to inform you that the Ontario Growth Secretariat has recently moved from the Ministry of Infrastructure to the Ministry of Municipal Affairs and Housing; this change affects the references to MOI in DEM-3. The previous comments that we submitted to the SPC during the consultation period are not affected. We are pleased to see that our previous comments on DEM-3 have been incorporated into this version. We have no further comments.

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DEM-4 No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Municipality	E	<p><b>Specify Action</b> (Municipal Water Conservation Plans)</p> <p>Municipalities responsible for the production, treatment, storage of water, who have a municipal well and/or whose residents are served by a municipal water supply for supplying water within the Tier 3 Water Budget WHPA-Q1 Local Areas shall develop and/or update Water Conservation Plans to ensure they are an effective tool to support sustainable water quantity by reducing consumption and therefore the demand for water.</p>	<p>Existing &amp; Future: WHPA-Q1 with a significant risk level</p> <p>Future: WHPA-Q1 with a moderate risk level</p> <p>Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)</p>	Existing & Future: Initiate within 2 years (T-16)	N/A  See Explanatory Notes	MON-1

COMMENTS POLICY DEM-4		
	Comments	Response
Town of Orangeville	The Town is requesting that the CTC SPC clarify why the legal effect for the proposed DEM-4 policy in a WHPA-Q2 with a moderate risk would be "E."	Moderate water quantity risks for future takings are considered significant and therefore require a "must conform" legal effect.

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DEM-5 No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Municipality	E	<p><b>Education and Outreach</b></p> <p>Municipalities responsible for <b>production, treatment and storage of water and/or jurisdictional lands</b> supplying water within any Tier 3 Water Budget <b>WHPA-Q1 Local Area</b> identified as having significant water quantity threats shall undertake the following education and outreach initiatives to help ensure water supplies are protected and increase the effectiveness of water conservation efforts in their jurisdictions to reduce consumption and therefore demand:</p> <p>1) <b>Shall Develop and implement</b> education and outreach programs to ensure that property owners and businesses <b>focus on: understand:</b></p> <ul style="list-style-type: none"> <li>a) their role in protecting water supplies and conserving water;</li> <li>b) actions that can be taken to protect water supplies and use less water; and</li> <li>c) financial incentive programs and projects that may be eligible for funding under future funding of the Ontario Drinking Water Stewardship Program; or</li> </ul> <p>2) Review any similar programs that may already exist and update them where necessary to ensure their effectiveness.</p>	Existing & Future: WHPA-Q1 with a significant risk level Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	Existing & Future: 2 years (T-10) <del>(T-16)</del>	GEN-6  See Explanatory Notes	MON-1
		MOECC	K	<p>3) <b>The Ministry of the Environment should provide municipalities with a list of appropriate education and outreach materials that provide information and guide to actions that can be taken to reduce the usage of drinking water for delivery by the municipality.</b></p>				MON-4

COMMENTS POLICY DEM-5		
	Comments	Response
Wellington County municipalities	11. Please clarify the meaning of jurisdictional lands.	The lands located within the boundaries of the municipality. Information to be included in the Explanatory Document.

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DEM-6 SPC to discuss	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Municipality	E	<p><b>Specify Action</b> (Joint Municipal Water Management)</p> <p>The Dufferin County municipalities that share a water source within a Tier 3 Water Budget <del>WHPA-Q1 Local Area</del> identified as having significant water quantity threats shall develop a Joint Municipal Water Supply Management model, and implement within 3 years of approval of the Source Protection Plan. This management model shall facilitate the planning and management of water supply sources to ensure sustainability of a long term water supply in each municipality and ensure that water quality and quantity is maintained or improved such that activities cease to be, or do not become, significant drinking water threats in the <del>WHPA-Q1 Local Area</del>. The municipalities shall report to MOECC and MMAH, on the options and proposed management model within 1 year of the approval of the Source Protection Plan.</p>	WHPA-Q1 with a significant risk level (Orangeville, Amaranth, East Garafraxa and Mono)	See Policy	DEM-7 N/A  See Explanatory Notes	MON-1

COMMENTS POLICY DEM-6		
	Comments	Response
MMAH	<p>MMAH is supportive of the approach for local municipalities to establish a joint municipal water management model to coordinate managing water resources across municipal boundaries. This is also supported by the 2014 PPS in which planning authorities shall protect, improve or restore water quantity by minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts (Policy 2.2.1)</p> <p>However, the ministry has concerns with the last sentence of the policy. The Dufferin County municipalities should not be required to report to MMAH on the options and proposed management model for joint municipal water management, particularly as these water systems are managed by the municipalities. This also appears to be counter to the explanatory note for policy DEM-6 which says the CTC SPC is of the opinion that the local municipalities should have the opportunity and responsibility to develop their local solutions. Further, the Dufferin County municipalities have jurisdiction as the water providers and therefore should lead the effort to establishing a proposed joint water supply management model.</p> <p>There may only be a need to engage MMAH, should decisions related to the provision of water have a bearing on other land uses issues, such as growth management.</p>	<p>Role of MMAH is not as a Planning Act Approval Authority, but to provide guidance, assistance and to facilitate the local municipalities to reach a local decision.</p> <p>This comment was discussed with MMAH staff via teleconference on August 27. MMAH staff were made aware of the SPCs intent of including them in the policy and more information will be provided in the Explanatory Document.</p>
Town of Orangeville	The Town continues to have concerns about the implementation of the proposed DEM-6 policy. While the Town does not question the objectives of this policy, the Town believes that extensive involvement from the Province and Source Protection Authority will likely be required to implement it successfully. The Town is requesting that the CTC SPC review this policy in its entirety in the context of the level of involvement the Province is willing to commit to, as well as the timelines for implementation.	Comment noted.
CVC Staff	CVC Staff supports the opportunity for the Dufferin County Municipalities to develop a local solution for the water Quality and Quantity threats. Given the threats to the municipal water sources it is important that a solution which coordinates water management within this area is addressed.	Comment noted.

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DEM-7 Option 1  No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	MOECC	K	<b>Specify Action</b> (Province to Support Joint Municipal Water Management System or Authority)  The Ministry of the Environment and Climate Change, in collaboration with the Ministry of Municipal Affairs and Housing and other affected provincial ministries and other agencies, as required, should initiate meetings with the Dufferin County municipalities that share a water source within a Tier 3 WHPA-Q1 <del>are wholly or partially within the Orangeville, Mono and Amaranth Tier 3 Local Area</del> identified as having Significant Water Quality and Quantity Threats within 1 year, to support the municipalities in developing mutually beneficial solutions to address water quantity and quality constraints. And further, the MOECC should provide technical support to the municipalities.	WHPA-Q1 with a significant risk level (Orangeville, Amaranth, East Garafraxa and Mono)	See Policy	DEM-6 N/A  See Explanatory Notes	MON-4
DEM-7 Option 2	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	MOECC	K	<b>Specify Action</b> (Province to Support Joint Municipal Water Management System or Authority)  The Ministry of the Environment and Climate Change, in collaboration with the Ministry of Municipal Affairs and Housing and other affected provincial ministries and agencies, as required, should <del>support</del> <b>support</b> <del>initiate meetings with</del> the Dufferin County municipalities that share a water source within a Tier 3 WHPA-Q1 identified as having Significant Water Quality and Quantity Threats <del>within 1 year, to support the municipalities in developing</del> mutually beneficial solutions to address water quantity and quality constraints <b>within one year of the approval of the Source Protection Plan</b> . And further, the MOECC should provide technical support to the municipalities.	WHPA-Q1 with a significant risk level (Orangeville, Amaranth, East Garafraxa and Mono)	See Policy	DEM-6 N/A  See Explanatory Notes	MON-4

COMMENTS POLICY DEM-7		
	Comments	Response
MOECC	1. The Ministry continues to support the goal of policy DEM-7 to establish a municipal working group to address water constraints in Orangeville, Mono and Amaranth. However, as the water providers, the municipalities should lead the effort by establishing a local implementing body to take on the facilitation role to ensure decision-making and partnership-building is fostered at the local level. Please revise this policy to require the local municipalities to work to develop “mutually beneficial solutions to address water quantity and quality constraints” with the support of the Ministry. The Ministry is committed to providing technical support and using its regulatory tools to support local decision making.	Noted.
MMAH	MMAH also notes that DEM-7 has been amended to include reference to MMAH. Similar to comments for DEM-6, the Dufferin County municipalities have jurisdiction as the water providers and should lead the effort to establishing a proposed water supply management model. We note that the	Role of MMAH is not as a Planning Act Approval Authority, but to provide guidance, assistance and to facilitate the local

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	MOE in its comments dated June 18, 2014 to the CTC SPC on DEM-7 requested this policy be revised to require the local municipalities to work to develop “mutually beneficial solutions to address water quantity and quality constraints” with the support of the MOECC.  MMAH supports the revisions proposed by MOECC and also recommends that policies DEM-6 and DEM-7 be revised by removing the reference to MMAH	municipalities to reach a local decision.  This comment was discussed with MMAH staff via teleconference on August 27. MMAH staff were made aware of the SPCs intent of including them in the policy and more information will be provided in the Explanatory Document.
<b>Town of Orangeville</b>	The Town continues to have concerns about the implementation of the proposed DEM-6 policy. While the Town does not question the objectives of this policy, the Town believes that extensive involvement from the Province and Source Protection Authority will likely be required to implement it successfully. The Town is requesting that the CTC SPC review this policy in its entirety in the context of the level of involvement the Province is willing to commit to, as well as the timelines for implementation.	Comment noted.
<b>CVC Staff</b>	MOE is identified as the implementer but the legal effect (K) is non-legally binding. CVC encourages the MOE to provide strong support to the Municipalities in order to assist them in achieving the requirements of DEM-6	Comment noted.

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<b>DEM-8</b> <b>No change</b>	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	MOECC	K	<p><b>Specify Action</b> (MOECC to Adopt and Fund Maintenance of the Tier 3 Water Budget Model)</p> <p>The Ministry of Environment and Climate Change should adopt and fund a Tier 3 Water Budget Model for each <b>WHPA-Q1 Local Area</b> identified as having <b>existing or future</b> significant water quantity threats and undertake the following to ensure it is maintained as the primary model to review existing and future PTTWs, to allow municipalities and other Provincial Ministries (i.e. Ministry of Municipal Affairs and Housing and Ministry of Infrastructure) to evaluate growth projections and distributions, and to facilitate the review of planning applications by municipalities where necessary to ensure that these activities <b>cease to be or</b> do not become significant drinking water threats:</p> <p>1) Through the Permit To Take Water program, require municipal takers in <b>WHPA-Q1 in Local Areas identified as having significant water quantity threats</b> to monitor water quantity and supply data on a regular basis to assist in the upkeep of the model <b>to determine any increase or reduction in significant water quantity threats;</b></p> <p>2) <b>Use the model with the most up to date data as an analysis and decision making tool; and</b>                      Run the model using the most up to date data, to analyze its predictions for water quantity issues and make necessary refinements to the model on an ongoing basis; and</p> <p>3) <b>When necessary</b> contribute to funding for new continuous flow gauging stations in key surface water features and enhance Conservation Authorities existing Hydrometric Network in the <b>WHPA-Q1 Local Area</b> to monitor long term trends in surface water quantity, study impacts of urbanization and climate change on aquifer recharge, and facilitate calibration of the model.</p>	Existing & Future: <b>WHPA-Q1 with a significant risk level</b>  Future: <b>WHPA-Q1 with a moderate risk level</b> Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	Existing & Future: Consider within 2 years (T-15)	DEM-1 DEM-3 N/A  See Explanatory Notes	MON-4

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-9 No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Municipality	E	<p><b>Specify Action</b> (Identifying Additional Water Supplies)</p> <p>Municipalities within a Tier 3 Water Budget Local Area identified as having significant water quantity threats are encouraged to identify additional water sources outside of the <del>WHPA-Q1 Local Area</del> to reduce demand from well systems which have been identified with significant water quantity stress and to report to the Source Protection Authority within 3 years on their progress.</p>	<p>Existing &amp; Future: WHPA-Q1 with a significant risk level</p> <p>Future: WHPA-Q1 with a moderate risk level Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)</p>	See Policy	N/A  See Explanatory Notes	MON-1
DEM-10 No change	An activity that takes water from an aquifer or a surface water body without returning the water taken to the same aquifer or surface water body	Municipality	E	<p><b>Specify Action</b></p> <p>York Region shall develop and implement a drought management plan using the Tier 3 water quantity risk assessment findings and modeling tool to prevent consumptive demand from becoming significant.</p>	<p>Future: WHPA-Q1 with a moderate risk level</p>	Existing & Future: Immediately (T-18)	N/A  See Explanatory Notes	MON-1

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
REC-1 Edited for clarity (no change to policy intent)	An activity that reduces recharge to an aquifer	Planning Approval Authority	A	<p><b>Land Use Planning</b> (Planning Policies for Protecting Groundwater Recharge)</p> <p>For applications under the Planning Act <del>Within the Orangeville, Mono and Amaranth</del> within the Tier 3 Water Budget WHPA-Q2 Local Areas identified as having significant water quantity threats the relevant Planning Approval Authority shall ensure recharge reduction ceases to be, or does not become, a significant drinking water threat by:</p> <p>1) Requiring new development for lands zoned Low Density Residential (excluding subdivisions) or zoned and Agricultural lands to implement Best Management Practices such as Low Impact Development with the goal to maintain predevelopment recharge.</p> <p>1) Only permitting new development and site alteration that has the potential to reduce recharge to an aquifer under the following conditions:</p> <p>a) <del>the development or site alteration is minor in nature per the following:</del></p> <p>i) <del>if development and/or site alteration occurs on lands outside of the Settlement Area, that the activity will increase lot imperviousness to no greater than total of 10%; or</del></p> <p>ii) <del>if development and/or site alteration occurs on lands within Settlement Area by requiring implementation of Best Management Practices such as Low Impact Development (LID) to maintain pre-development recharge and surface water flow regime.</del></p> <p>b) <del>In the case of development/site alteration that is not minor, it can be demonstrated through submission of a satisfactory hydrogeological study that recharge functions and surface water flow regimes will be maintained and current PTTW allocations can be sustained, and the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained. The assessment of Hydrogeological impacts should consider the use of the Tier 3 Water budget Model where appropriate.</del></p> <p>2) Requiring that all site plan (excluding single family dwellings), subdivision, and condominium applications for new residential, commercial, industrial and institutional uses provide a water balance assessment for the proposed development to the satisfaction of the Planning Approval Authority which addresses each of the following requirements;</p> <p>a) Maintain predevelopment recharge to the greatest extent feasible through Best Management Practices such as LID, minimizing impervious surfaces, lot level infiltration.</p> <p>b) Where pre-development recharge cannot be maintained on-site necessary, implementation and maximization of off-site recharge enhancement (within the same WHPA-Q2) to compensate for any predicted loss of recharge from the development.</p>	Existing and Future: WHPA-Q2 with a significant risk level  Future: WHPA-Q2 with a moderate risk level	Future: Immediately (T-9)  Amend OPs and ZBLs for conformity within 5 years and ZBLs within 3 years of OP approval (T-8)	N/A  See Explanatory Notes	MON-1

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
				<p><b>c) For new development (excluding a minor variance) within the WHPA-Q2 and within an ICA (for sodium, chloride or nitrates) the water balance assessment shall consider water quality when recommending Best Management Practices and address how recharge will be maintained and water quality will be protected.</b></p> <p><del>2) Requiring the use of low impact development guidelines and techniques for managing urban storm water in support of new development and site alteration to ensure that the following criteria are met:</del></p> <ul style="list-style-type: none"> <li><del>a) impervious surfaces are minimized;</del></li> <li><del>b) water balance on the site is managed such that pre-development rates of infiltration of clean water are maintained in the post-development state to the extent feasible;</del></li> <li><del>c) lot conveyance and/or end of pipe storm water management measures are used that emphasize lot level infiltration of clean water wherever appropriate;</del></li> <li><del>d) where water balance cannot be achieved on the development site, off site compensation opportunities are explored and implemented where feasible; and</del></li> <li><del>e) where sodium and chloride have been identified as "issues", no further degradation of water quality by salt run-off infiltration shall occur.</del></li> </ul> <p>3) Only approving settlement area expansions as part of a municipal comprehensive review where it has been demonstrated that recharge functions <del>and surface water flow regimes</del> will be maintained on lands designated significant groundwater recharge areas within <del>WHPA-Q2</del> Local Area A.</p> <p>4) Amending municipal planning documents to reference <b>most current Assessment Reports in regards to the require maps showing the Significant Groundwater Recharge Areas within WHPA-Q2.</b> <del>the protection of lands demonstrated to have significant recharge functions, including recharge from surface water features such as streams or wetlands.</del></p> <p><b>5) For new development (excluding a minor variance) within any part of a Tier 3 Water Budget WHPA-Q2 identified as having significant water quantity threats which also includes an Issue Contributing Area for Sodium, Chloride or Nitrates require the submission of a report that demonstrates to the satisfaction of the Planning Approval Authority how recharge will be maintained and water quality will be protected.</b></p>				

COMMENTS POLICY REC-1		
	Comments	Response
MOECC	<p>2. We note in policy REC-1(2) that office uses and employment lands were not captured and it is not clear why they were not. These uses could be captured in policy or could be explained in the explanatory document – e.g. commercial includes areas where goods and services are sold to the travelling public and includes offices.</p> <p>If Clause 2b) was meant to capture all of the instances where pre-development recharge cannot be maintained, we suggest you replace the word “necessary” with “pre-development recharge cannot be maintained on-site”.</p>	<p>To be added to Explanatory Document.</p> <p>Policy revised.</p>

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<p><b>NEC</b></p>	<p>19. Conditions related to implementing best management practices for recharge in new residential development could be dealt with at such time that a Niagara Escarpment Development Permit application is received. NEC staff would circulate any Niagara Escarpment Development Permit applications within identified vulnerable areas to the Source Protection RMO for their review and recommendation.</p> <p>11. We note that the effect of this policy is legally binding (List A policy) and that the NEC is considered a “planning approval authority” in this policy. As noted above, the NEC is not legally bound to implement SPP policies but, as noted in Comment 6, we support source protection and intend to incorporate a general policy in the NEP related to the protection of source water that is consistent with the intent of the <i>Clean Water Act</i>. However, we question whether the NEC should be listed for List A policies.</p> <p>12. For the reasons noted above, staff does not feel it is necessary to develop a specific policy in the NEP for each SPP policy to address this matter.</p>	<p>Comment noted.</p> <p>Staff to remove NEC from the “List A” policy tables in the Appendices. Have confirmed this revision with MOECC staff.</p>
<p><b>Town of Orangeville</b></p>	<p>- The Town is requesting that the CTC SPC clarify if the legal effect for the proposed REC-1 policy in a WHPA-Q2 with moderate risk should be "A" or "B."</p> <p>- Part 5 of the proposed REC-1 policy requires that a report be provided to the satisfaction of the Planning Approval Authority that demonstrates how the proposed development will maintain recharge and protect water quality in ICAs for Sodium, Chloride, and Nitrates within the WHPA-Q2. The Town is requesting that the CTC SPC provide guidance to the Planning Approval Authority on the types of "reasonable" measures that would meet this requirement. Factors that the Town would like the CTC SPC to consider when determining if a measure is reasonable are the life cycle costs (capital, operating, and replacement), maintenance requirements, and the area of land required.</p>	<p>Legal effect is ‘A’ because the policy applies to <u>Future Significant</u> Water Quantity threats (these are possible in an area with a moderate risk level).</p> <p>CTC staff will provide guidance and assistance.</p>
<p><b>Halton Region and lower tier munic.</b></p>	<p>38. 1) “Agricultural lands” needs to be changed if they are referring to “Agricultural uses”, also with respect to what “Best Practices”, unclear as to what is required from the applicants or how does the Planning Approval Authority ensure through the Planning process that this has been accomplished.</p> <p>2) During a Site Plan stage for an application, and a water budget is provided that is deemed to be unacceptable (not sure who would review this?) then is the Planning Approval Authority to not support the Site Plan? It is too late at that point, if the zoning is already in place to allow for that use. As we have mentioned in previous comments, is the onus on the applicant of the municipal planners to identify offsite recharge areas within the same WHPA-Q to compensate for any loss of recharge at the development site? This needs to be explained.</p> <p>2a) Should be changed to say “to the greatest extent where reasonable and feasible”.</p> <p>2b) “Where necessary” should be changed to “where reasonable and feasible”. This flexibility is needed to actually implement this policy. Each site and circumstance is unique and it is not possible to compensate for a predicated loss in all situations. Issues would include: time delays, financial costs, additional approvals needed, difficulty compelling a land owner to undertake offsite works without cooperation.</p> <p>3) This additional policy test for settlement boundary expansions seems unnecessary given current restrictions on settlement area expansion in the PPS, 2014 as well as more specific restrictions in the provincial plans (Greenbelt Plan, Growth Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan) that apply to CTC watershed area Given that these broader-scale provincial plans are up for review in 2015/2016 additional criteria for settlement expansion can be better evaluated in the context of a broader provincially-led public policy review.</p> <p>4) As we have commented before, we don’t want maps of Significant Recharge Areas within our Official Plan – we wanted the wording changed to indicate that planning documents can refer to the Assessment Report maps, rather than include the maps in the planning documents, since the recharge maps change faster than the planning documents are updated.</p> <p>5) This policy is confusing as written. Policy as written does not appear to match/accomplish intent as described by the accompanying note. Policy should be written more directly to address concern that the implementation of risk management measures to protect water quantity do not affect water quality. Another report is not necessary as required in sub policy 5. The report required in sub policy 2 could addresses quantity vs. quality issues in the WHPA-Q2/ICA area. A new</p>	<p>- Updated policy to provide clarification.</p> <p>- It is up to the Planning Approval Authority to establish how this policy is to be implemented.</p> <p>- “feasible” added.</p> <p>- The policy already allows for flexibility and is not asking for 100% compensation. Notes to be added to the Explanatory Document.</p> <p>- Noted. This part of the policy is directed to the Provincial Government who would be the Planning Approval Authority for such expansions.</p> <p>- Policy revised.</p> <p>- Police revised. Notes will be added to the Explanatory Document regarding reporting.</p>

sub section could be listed under sub policy 2) stating “for proposed developments located in the WHPA-Q2 and in and ICA (for sodium, chloride or nitrates) the water balance assessment shall consider water quality when recommending Best Management Practices.” As previously commented, unclear as to what type of report is required or who would be responsible for reviewing this report or what would happen if it was not deemed to be acceptable
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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-2</b> Staff to confer with MOECC	An activity that reduces recharge to an aquifer	RMO	H	<p><b>Part IV, s.58</b></p> <p>When a Building Permit and no Planning Act application is required within a Tier 3 Water Budget WHPA-Q2, identified as having a significant risk level, an activity that reduces the recharge to an aquifer is designated for the purpose of s.58 under the Clean Water Act as, requiring a risk management plan where the threat would be significant.</p> <p>Without limiting other requirements, risk management plans shall require implementation of downspout disconnections and other best management practices to increase infiltration of clean water whenever modifications, additions or renovations are undertaken at existing properties or in new development with the goal of restoring or maintaining predevelopment recharge.</p>	WHPA-Q2 with a significant risk level	Future: Immediately (T-7)	GEN-1  See Explanatory Notes	MON-2

COMMENTS POLICY REC-2		
	Comments	Response
MOECC	<p>3. Policy REC-2 appears to present challenges for municipalities with respect to implementation. First, it appears the intention is to have the policy apply to building permits where Planning Act applications are not underway. This could pose challenges for implementation because a Planning Act application may have been recently finalized (and subject to REC-1), and then the building permit requires a RMP. Further, the provisions of the RMP, such as downspout disconnection, could be achieved through a by-law than negotiate and enforce risk management plans with numerous property owners.</p> <p>It appears if this policy applies only to areas where there is a significant risk level. If that is the case then the areas where moderate risk level (future significant risks) need to be addressed (for example REC-3 could be modified to include moderate risk level).</p>	Staff are having further discussion with MOECC to clarify this policy.
Town of Orangeville	<p>The current definition of an Existing Threat Activity includes "an expansion, alteration, or replacement of an existing building or structure that does not increase the risk of contaminating drinking water." Based on this definition, it appears that the proposed policy for REC-2 will not apply to any building permit application where an existing structure exists. This seems to be contrary to the intent of this policy, as outlined in the explanatory document. The Town is requesting that the CTC SPC provide further clarification on how the REC-2 policy will apply to Existing Threat Activities if this is the intent of the CTC SPC.</p> <p>If the proposed REC-2 policy is revised so that it does apply to Existing Threat Activities, the Town is concerned that this policy will result in a significant increase in scope, and as a result renovation costs, to the majority of building permit applicants if the requirement will be for the applicant to retrofit their existing property with the goal of restoring pre-development recharge. The Town is requesting that the CTC SPC consider revising this policy so that the ultimate recharge objective for the applicant is reduced, and the conditions under which this policy will apply are revised to only include expansions or new buildings/structures at the site.</p>	<p>- The Existing Threat Activity definition has been revised to include water quantity threats.</p> <p>- The only kind of activities that would be covered by the policy is any activity that would reduce recharge to the aquifer. If the development doesn't cause a reduction in recharge then the policy doesn't apply. CTC staff will help the Town work through guidelines of how these types of applications would be screened to determine if the policy would apply and be flagged for a RMP.</p>

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Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
REC-3 Revised for accuracy	An activity that reduces recharge to an aquifer	Municipality	E	<p><b>Specify Action</b></p> <p>Within a Tier 3 Water Budget WHPA-Q2 with a significant risk level, the municipality shall develop and implement <del>an action plan, including</del> actions to be taken and an implementation schedule, to ensure that an activity which reduces aquifer recharge ceases to be, or does not become, a significant water quantity threat.</p> <p><del>The action plan</del> Such actions may include:</p> <ul style="list-style-type: none"> <li>a) Reviewing options to maximize aquifer recharge;</li> <li>b) Delivering an education and outreach program to inform property owners about actions that can be taken to protect aquifer recharge (e.g., downspout disconnection, site grading). The program may include incentives (such as rebates) to encourage best management practices;</li> <li>c) Requiring the use of Low Impact Development (LID) in new development or retrofits.</li> </ul>	WHPA-Q2 with a significant risk level	Existing & Future: Implement within 2 years (T-17)	GEN-6 See Explanatory Notes	MON-1
		MOE	K	The Ministry of the Environment should provide municipalities with a list of appropriate education and outreach materials that provide information and guide to actions that can be taken to protect aquifer recharge for delivery by the municipality.				MON-4

COMMENTS POLICY REC-3		
	Comments	Response
Halton Region and lower tier municipalities	39. The wording is vague and unclear for this policy. Does this action plan have to address all threats? Something seems to be missing in the policy. The accompanying note speaks to education and outreach and not an "Action Plan".	Policy has been revised for clarification. Associated Explanatory Document notes will be revised.
Wellington County municipalities	12. Action Plan for Recharge to the Aquifer and Timing Policy T-17 – This policy commits municipalities to developing an action plan to address activities that reduce recharge to an aquifer within two years. It would assist municipalities to have more time to develop this action plan especially given the expected work load within the first two years of implementing the Amended Proposed Plan.	The area where the policy applies within Wellington County is very limited.

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GENERAL COMMENTS ON WATER QUANTITY		
	Comments	Response
Wellington County municipalities	10. Water Quantity Policies Section 10.13 – The text of this section indicates that water quantity policies were developed for the Orangeville and area water quantity threats only, however, policies in the policy tables and maps are for other areas including Erin, Halton Hills, York Region. It appears the section 10.13 text has not been updated to reflect the new water quantity policies. Please clarify that the Amended Proposed Plan contains water quantity policies for the Halton Hills / Erin area.	Staff will revise section 10.13.
CLOSPA	<p>The CLOSPA supports the Recharge and Demand policies that applies to activities that have the potential to reduce recharge to the aquifer and or impact supplies in the part of the CLOSPA where the activity could become a significant threat (in the northwest corner, west of Lakeridge Rd., north of Townline).</p> <p>The small area within CLOSPA that is identified as a vulnerable area is on the Oak Ridges Moraine and well removed from any designated settlement area. As a result, the policies dealing with settlement expansion policy would not be applicable within CLOSPA. Nevertheless, CLOSPA supports this policy as it is consistent with the Oak Ridges Moraine Conservation Plan and the Provincial Policy Statement.</p> <p>There are also seven demand policies that apply to the delineated northwest corner of CLOSPA with respect to activities that take water where they could become significant threats (Demand policies - DEM-1, -2, -3 -4, -8, 9, and -10). These policies are related to the taking of water from an aquifer where the water is not returned to the same aquifer and could have an impact on future permit to take applications for activities within the delineated area.</p> <p>It has been shown that development planning must include the consideration of adequate water supplies for all intended uses and include drinking water, waste assimilation and environmental flow and sustainability requirements. Several cases have demonstrated the consequences of not doing so. Additionally, groundwater is an important and economically viable resource as a drinking water supply for several communities. Communities that rely of this resource need the governing agencies to ensure that their supply is protected (quality AND quantity). The York Tier 3 study has shown that in order to ensure the continued supply for several communities, recharge and water demand must be managed in a comprehensive manner that sometimes requires the coordination of several water resource management and planning agencies. CLOSPA wishes to indicate support for these policies.</p>	Comment noted.
TRSPA	<p>TRSPA supports the Recharge and Demand policies that apply to activities that have the potential to reduce recharge to the aquifer and/or impact supplies in the part of the TRSPA where the activity could become a significant threat (northern portion of the TRSPA on the Oak Ridges Moraine). In particular, TRSPA staff support the policy dealing with settlement expansion (DEM-2), since this policy is consistent with the Oak Ridges Moraine Conservation Plan and the Provincial Policy Statement.</p> <p>There are also seven other demand policies (DEM-1, 3, 4, 8, 9, and 10) that apply to <b>future</b> significant drinking water threats in the TRSPA portion of the Local Area. These apply to future activities that may require groundwater withdrawals where they could become significant threats. These policies are related to the taking of water from an aquifer where the water is not returned to the same aquifer and could have an impact on future permit to take water applications for activities within the delineated area.</p> <p>Future development planning must consider the availability of adequate water supplies for all intended uses, including drinking water, waste assimilation, and environmental flow and sustainability requirements. Although Lake Ontario provides much of the drinking water within the TRSPA, groundwater is still an important resource for communities such as Caledon, Palgrave, Kleinburg, Nobleton, King City, Whitchurch-Stouffville and Uxbridge. These communities rely on groundwater for all or part of their needs. Therefore, the governing agencies must ensure that the supply is protected (quality and quantity). The York-Durham Tier 3 study has shown that in order to ensure the continued supply for several communities, recharge and water demand must be managed in a comprehensive manner.</p>	Comment noted.
CVC Staff	CVC Staff supports the Recharge and Demand policies that apply to activities that have the potential to reduce recharge to an aquifer and or impact supplies in the part of CTSPA where the activity is or could become a significant threat (existing & future) or is a moderate risk level (future).	Comment noted.

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<b>CVC Staff</b>	Recharge Policies: The implications of climate change have not been factored into the recharge analyses informing this policy. The implementation and effectiveness of this policy may be impacted by changes in the rainfall regime. CVC staff recommends that climate change factors be incorporated within the policies.	Comment noted. To be considered for update of recharge analysis.
<b>General Public 3</b>	<p>1. I have concerns with the proposed regulations which do not define the size of permitted agricultural uses that will not require very expensive impact assessments for lands within the tier 3 water budgeting areas. As a farmer there is great concern on the restrictions put on farming in the shadow of the GTA.</p> <p>2. I do not believe the tier 3 area in and around the 8th Line and 22nd Sideroad is correct. I would like a field assessment to show how lands that are lower and closer to the Beany Creek are excluded from the water budget when lands farther away and completely blocked from drainage by residential development could be included? I have sent an earlier email in this regard and was not able to have this corrected. This is a significant error.</p>	Staff have discussed this concern with the individual and the Region of Halton staff. The Region of Halton staff have confirmed the mapping is correct and have previously offered to meet with the landowner.

<b>COMMENTS ON WATER QUANTITY MAPPING</b>		
	<b>Comments</b>	<b>Response</b>
<b>MHBC Planning</b>	<p>In February 2014, CTC staff presented a report to the Committee recommending the reduction in threat levels for Local Area C in accordance with direction provided by the Ministry of the Environment (MOE). As a result, my client's lands were revised from a significant risk level to a moderate risk level. It is my understanding that the Committee approved this recommendation.</p> <p>Map 3.3 of the proposed plan identifies "Significant Groundwater Quantity Threat Areas" in Georgetown. My client's lands are identified within this area along with all of the other lands that were classified as a moderate risk in February 2014. The low, moderate and significant risks are no longer identified. Our concern is that the lands identified in Map 3.3 could be interpreted to be significant risk areas which have policies that apply to existing and approved activities. While it is acknowledged that the water quantity policies apply to future activities within moderate risk areas, we recommend that these areas be identified by risk level as shown on Figure 1.</p>	Comment noted. CTC staff will improve the clarity of the map legend.