

**Attachment 1: Proposed Revisions to Water Quantity Policies for CTC SPC Consideration**

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-1	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	MOE	C	<p><b>Prescribed Instrument</b> (PTTW Policies in Local Areas with Quantity-related Significant Drinking Water Threats)</p> <p>Within the Tier 3 Water Budget Local Areas identified as having significant water quantity threats the Ministry of Environment 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> <ol style="list-style-type: none"> <li>1) Reviewing all existing Permits To Take Water, in consultation with the Ministry of Natural Resources, the affected Municipality and relevant Conservation Authorities, and amend the permits where necessary to ensure:                             <ol style="list-style-type: none"> <li>a) that municipal water supply requirements for the current and planned service capacity (per the current approved population projections of the most recent Growth Plan for the Greater Golden Horseshoe) will be met on a sustainable basis; and</li> <li>b) that the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems in the Local Area will be maintained.</li> </ol> </li> <li>2) Issuing Permits To Take Water for new or increased takings only if it can be satisfactorily demonstrated, using Tier 3 Water Budget Model where appropriate, that the taking:                             <ol 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, or interfere with other permitted takings; and</li> <li>c) will ensure the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</li> </ol> </li> </ol>	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	MON-4

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-1 Rev	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	MOE	C	<p><b>Prescribed Instrument</b> (PTTW Policies in <del>Local Areas</del> WHPA-Q1 with <del>Significant Water</del> Quantity-related <del>Significant Drinking Water</del> Threats)</p> <p>Within the Tier 3 Water Budget <del>Local Areas</del> WHPA-Q1 identified as having significant water quantity threats the Ministry of Environment 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> <ol style="list-style-type: none"> <li>1) Reviewing all existing Permits To Take Water, in consultation with <del>the Ministry of Natural Resources, other Ministries (as required)</del>, the affected Municipality and relevant Conservation Authorities, and amend the permits where necessary to ensure:                             <ol style="list-style-type: none"> <li>a) that municipal water supply requirements for the allocated <del>current</del> and planned <del>quantity service capacity</del> (per the current approved population and employment projections of the most recent Growth Plan for the Greater Golden Horseshoe) will be met on a sustainable basis; and</li> <li>b) that the <del>ecological and</del> hydrological integrity of <del>municipal wells of key hydrologic features, functions and aquatic systems</del> in the <del>Local Areas</del> WHPA-Q1 will be maintained.</li> </ol> </li> <li>2) Issuing Permits To Take Water for new or increased takings only if it can be satisfactorily demonstrated, using <del>most recently approved</del> Tier 3 Water Budget Model where appropriate, that the taking:                             <ol 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</del> hydrological integrity of <del>municipal wells key hydrologic features, functions and aquatic systems</del> will be maintained.</li> </ol> </li> </ol>	WHPA-Q1 with a significant risk level	Future: Immediately (T-3)  Existing: 3 years (T-1)	DEM-12 GEN-5	MON-4

COMMENTS POLICY DEM-1		
	Comments	CTC Response
CTC Staff	CTC Staff recommend the following be added as part of the Explanatory Document: The intent of DEM-1 is to ensure that all aspects are considered in the PTTW. Specific consideration should be taken into account in the review of Aggregate Resource Extractions, Fisheries, population and employment projections.	Recommendation to Committee for addition to Explanatory Document
MOE-1	i. Part 1: Please remove reference to “in consultation with the Ministry of Natural Resources” as MNR is not involved in the PTTW process.	Change made
MOE-1	ii. Part 2: Suggest adding most recently approved to “Tier 3 Water Budget Model”.	Change made
MOE-1	iii. Parts 1(b), 2(b) and 2(c) are outside the scope of the CWA and are addressed through the OWRA. Please remove the statements “or interfere with other permitted takings” and “ensuring the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained” which do not meet the requirement of the ‘cease-to-be’ significant test in Section 22 of the CWA. Although ecological and hydrological factors are considered in determining the level of risk, policies in the plan must be directed at an activity’s impact on the sustainability of the municipal system. The CWA does not give authority to write policies to address these impacts; therefore these references needs to be	Noted – see CTC response below

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-1		
	Comments	CTC Response
	removed. <b>(See next comment).</b>	
<b>MOE-2</b>	<p>Our previous comment to the SPC was to remove DEM-1 (Parts 1b, 2b, 2c) and DEM-2 (Parts 1b and 2c) from the policy as it does not contribute to meeting Section 22 of the CWA, which requires policies to meet the objective of ceasing to be a SDWT. Regulations under the CWA provide limitations on what types of policies can be included that are not linked directly to addressing a SDWT. Although hydrological and ecological functions are important to maintain, for the drinking water systems addressed in the CTC SPP, these impacts are not linked to the identification of SDWTs. They are, however, required to be managed through the OWRA which provides for the conservation, protection and management of Ontario’s waters for their efficient and sustainable use (section 0.1) and is the primary legislation of the PTTW program. Below is some context on why ecological and hydrological integrity as it currently appears in these policies would not be appropriate to include in the SPP:</p> <p>i. As recently discussed with the SPAs/Chairs, there is an inconsistency in the guidance for water budgets and the MOE Technical Rules. For a system pumping within its allocated quantity of water, as defined under the rules, the water budget scenarios do not allow you to set a local area risk level of significant based on impacts to “other uses” – which includes ecological and hydrological integrity (outside of the integrity of the municipal system itself). For the systems in CTC, the municipal systems are pumping within their allocated quantity of water; therefore there is no consideration of the impact on other uses by the municipal system taking water in establishing the risk level. Therefore writing policies that impose this test is inconsistent with how the risk is identified in the first place. As a result, including terms and conditions in the PTTW to address these impacts would not reduce the risk to the sustainability of the drinking water system and therefore, should not be addressed under the authorities set out in the CWA. However, they would be managed under the OWRA.</p> <p>ii. Despite the recent communications on how risk levels are established for drinking water systems, putting this clause in a policy would, in many cases, still be imposing a test inconsistent with the regulation under the CWA. There will be cases where a proposed water taking for another “user” within the local area predicts some level of impact on ecological or hydrogeological integrity, yet that impact does not have any direct link to the sustainability of the municipal drinking water system takings. The impact on “other uses” may be localised to the proposed taking and not increase or change in any way how a municipal system impacts these “other uses”. MOE will need to take this into consideration when evaluating a PTTW and should be bound by policies in a SPP unless there is an impact on the sustainability of the municipal system. For example, a PTTW application has tests which demonstrate that it is affecting a nearby stream, but there is no indication that this impact affects the water budget scenarios used to evaluate the risk level of the municipal system. In this case, not issuing the PTTW for that well does not improve the sustainability of the municipal drinking water system. This type of situation would be managed through the OWRA, not the CWA. However, if this same system had an impact on the water level in the municipal system itself, then the PTTW would be directly impacting the sustainability of the well and it would be appropriate to include terms and conditions in the PTTW to address this risk under the CWA authorities.</p>	Noted – see CTC response below
<b>MOE-2</b>	<p>Revision Options for Consideration:</p> <p>A) Remove DEM-1 (Parts 1b, 2b, 2c) and DEM-2 (Parts 1b and 2c) completely. With this, the remaining policy would obligate MOE (DEM-1) or the Planning Approval Authority (DEM-2) to ensure the risks to the municipal system are managed.</p> <p>B) Revise DEM-1 (Parts 1b, 2b, 2c) and DEM-2 (Parts 1b and 2c) by removing reference to ecological functions/integrity. The hydrogeological integrity component of the policy can remain as long as it refers to the integrity of the municipal well(s). For example, if the pumping of a well impacts the ability of the municipal system to draw their allocated quantity of water – then policies need to be in place to manage this.</p>	Noted options. Revisions made to reflect Option B as it appears to be the closest that reflects CTCs proposed policy Committee to discuss.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-1		
	Comments	CTC Response
	<p>C) Revise DEM-1 (Parts 1b, 2b, 2c) and DEM-2 (Parts 1b and 2c) to include references to allocated or planned quantities of water. If the modelling for the municipal system includes allocated and planned quantities of water, then the scenarios for the planned quantity of water also includes an assessment of other uses. If this is the case, the policies that direct the province to consider ecological and hydrological integrity when evaluating a planned quantity of water are appropriate.</p> <p>Additionally, within the Explanatory Document for any of the above options, the SPC could include wording on how the water budget model information should be used to inform decisions on the PTTW under the OWRA. Specifically, that this model can provide information to support the review of PTTW applications and identify areas where ecological and hydrological impacts are likely to occur.</p>	<p>Note to Committee: CTC staff recommend including the recommendation of the water budget model usage within the Explanatory Document.</p>
NEC	<p>It may be beneficial to harmonize the language in the proposed SPP policies with the PPS, particularly in cases where the proposed policy does not appear to afford protection as great as the PPS. For example, DEM-1 1b) states: "...that the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems in the Local Area will be <u>maintained</u>", whereas the PPS speaks to <u>protecting, improving, or restoring</u> the quality and quantity of water.</p>	<p>Noted. MOE has advised CTC that the proposed policy wording is out of scope of the CWA. Revisions have been made.</p>
Town of Erin	<p>If a proposed water taking in the Town of Erin is within the designated Local Areas (for Quantity-related Significant Drinking Water Threats) that extend into the Town, and it is determined that the water taking will not be allowed because it cannot be satisfied that the aquifer will have the ability to meet the municipal water supply requirements for the Region of Halton will there be compensation to the Town Of Erin? Since Halton is basically either using groundwater, or reserving groundwater for future use, from areas within the Town of Erin, the Region of Halton in effect, diminishes potential future water uses of any kind in these areas within the Town of Erin.</p>	<p>Noted. The SPC cannot make policies requiring a municipality to offer compensation. This is a matter for negotiation between the affected municipalities. Allocation of water is a provincial authority under the <i>Ontario Water Resources Act, Permit to Take Water</i>.</p>
Halton Region	<p>Staff supports the use of prescribed instruments (existing provincial regulations such as the Safe Drinking Water Act) as the primary vehicle to regulate / manage drinking water threat activities. After reviewing the Draft Proposed Water Quantity Policies, staff noted that in many cases a "layering" of approaches and tools (i.e. application of prescribed instrument plus Land Use Planning tools) are used for managing a threat (e.g. DEM-1 and DEM-2)</p> <p>This "layering" requires other bodies (Region, Town, CVCA, etc.) to take action in regards to an activity which is already subject to regulation by existing legislation. We do not generally support this approach and note the duplication is redundant, confusing, difficult to implement, and costly. Staff maintains that the implementing body which currently has the jurisdiction to regulate an activity under existing legislation should be left to do so.</p>	<p>Noted.</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-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	Planning Approval Authority	A	<p><b>Land Use Planning</b> (Planning Policies in Local Areas with Quantity-related Significant Drinking Water Threats)</p> <p>Within the Tier 3 Water Budget Local Areas 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> <ol style="list-style-type: none"> <li>1) Only permitting new development or site alteration that requires new or increased water takings beyond the planned future service capacity if the following applies:                             <ol style="list-style-type: none"> <li>a) the development or site alteration is minor as determined per the Planning Approval Authority, including not requiring a new/amended PTTW; or</li> <li>b) it can be satisfactorily demonstrated that the increase in water demand can be accommodated on a sustainable basis; and</li> <li>c) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</li> </ol> </li> <li>2) 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:                             <ol style="list-style-type: none"> <li>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</li> <li>b) the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</li> </ol> </li> <li>3) Only approving settlement area expansions as part of a municipal comprehensive review where the applicable provincial planning criteria have been met and the following has been demonstrated:                             <ol 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 ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</li> </ol> </li> </ol>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	N/A	MON-1

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-2 Rev	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 <del>Local Areas</del> WHPA-Q1 with <del>Significant Water</del> Quantity-<del>related Significant Drinking Water</del> Threats)</p> <p>Within the Tier 3 Water Budget <del>Local Areas</del> WHPA-Q1 identified as having significant water quantity threats the relevant Planning Approval Authority shall ensure water taking does not become a significant <del>drinking water quantity</del> threat by:</p> <ol style="list-style-type: none"> <li>1) Only permitting new development or site alteration <del>that requires new or increased water takings beyond the planned future Allocated Quantity service capacity</del> if the following applies:                             <ol style="list-style-type: none"> <li>a) the development or site alteration is minor as determined per the Planning Approval Authority, including not requiring a new/amended PTTW; or</li> <li>b) it can be satisfactorily demonstrated that the increase in water demand can be accommodated on a sustainable basis; and</li> <li>c) the <del>ecological and</del> hydrological integrity of <del>municipal wells key hydrologic features, functions and aquatic systems</del> will be maintained.</li> </ol> </li> <li>2) 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:                             <ol style="list-style-type: none"> <li>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</li> <li>b) the <del>ecological and</del> hydrological integrity of <del>municipal wells key hydrologic features, functions and aquatic systems</del> will be maintained.</li> </ol> </li> <li>3) Only approving settlement area expansions, <del>within WHPA-Q1</del> as part of a municipal comprehensive review where the applicable provincial planning criteria have been met and the following has been demonstrated:                             <ol 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</del> hydrological integrity of <del>municipal wells key hydrologic features, functions and aquatic systems</del> will be maintained.</li> </ol> </li> </ol>	WHPA-Q1 with a significant risk level	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	DEM-13	MON-1



CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-2		
	Comments	CTC Response
	Additionally, within the Explanatory Document for any of the above options, the SPC could include wording on how the water budget model information should be used to inform decisions on the PTTW under the OWRA. Specifically, that this model can provide information to support the review of PTTW applications and identify areas where ecological and hydrological impacts are likely to occur.	recommendation of the water budget model usage within the Explanatory Document.
<b>Town of Erin</b>	The proposed policy potentially impacts future land uses in the designated Local Areas extending into the Town of Erin. Although the intent of this policy is related to new development or site alterations in the Region of Halton, where the growth and/or land use changes are occurring, it is interpreted that for any new development or site alteration within policy areas in the Town of Erin, it will have to be satisfactorily demonstrated that any increase in water demand can be accommodated for both sustainability and ecological integrity of key hydrologic features and functions. Could the potential impact of land use policies affecting the policy areas within the Town of Erin be clearly transmitted to the Town of Erin? The concern is that any future land uses changes within these policy areas will have an additional level of review or assessment and at additional cost to the Town.	Policy revised. Updates to Official Plan and By-Law may be required to ensure conformance to the approved SPP
<b>Halton Region</b>	<p>DEM-2(1) This policy is unnecessary because there is unlikely to be new development occurring that requires new or increased water takings beyond the planned future service capacity.</p> <p>There is already a well-established Master Planning process in place to comprehensively review municipal servicing capacity for planned growth in accordance with the Places to Grow Act, 2005 and mandated provincial growth targets in Halton Region. Where any required PTTW increases in groundwater takings are required to support development growth, a process already exists where the MOE reviews and evaluates the proposed groundwater takings posed by Halton Region as in DEM-1.</p> <p>Also, the following term (“accommodated on a sustainable basis defined”) needs to be clearly defined as it’s used more than once in the policies.</p>	<p>Noted. Policies need to be in place for <u>all</u> municipalities within the CTC.</p> <p>Refer to section 2 of DEM-2 as it outlines the requirements to prove ‘accommodated on a sustainable bases’ is met.</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

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DEM-3	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 MOE	K	<p><b>Specify Action</b> (Growth Management/Planning Ministries to Review Growth in Local Areas with Quantity-related Significant Drinking Water Threats)</p> <p>Within any Tier 3 Water Budget Local Area identified as having significant water quantity threats the Provincial Ministries specified below shall undertake the following to ensure municipal population growth forecasts and distributions are sustainable based on available water systems:</p> <ol style="list-style-type: none"> <li>1) 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</li> <li>2) The Ministry of Infrastructure shall take into consideration water quantity constraints identified through Tier 3 water budgets during its review of the population forecasts contained in the Growth Plan for the Greater Golden Horseshoe, in consultation with relevant municipalities.</li> </ol>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	2 years (T-15)	N/A	MON-4
DEM-3 Rev	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 MOE	K	<p><b>Specify Action</b> (Growth Management/Planning Ministries to Review Growth in <del>Local Areas</del> WHPA-Q1 with Significant Water Quantity-<del>related Significant Drinking Water</del> Threats)</p> <p>Within any Tier 3 Water Budget <del>Local Areas</del> WHPA-Q1 identified as having significant water quantity threats the Provincial Ministries specified below shall undertake the following to ensure municipal population and employment growth forecasts and distributions are sustainable based on available water systems:</p> <ol style="list-style-type: none"> <li>1) 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 <del>drinking</del> water quantity threat, given water quantity constraints identified in Tier 3 Water Budget model areas; and</li> <li>2) The Ministry of Infrastructure shall take into consideration water quantity constraints identified through Tier 3 water budgets during its review of the population forecasts contained in the Growth Plan for the Greater Golden Horseshoe, in consultation with relevant municipalities. <b>No Change</b></li> </ol>	WHPA-Q1 with a significant risk level	2 years (T-15)	DEM-14	MON-4

COMMENTS POLICY DEM-3	
Comments	CTC Response
<p><b>Town of Erin</b></p> <p>It is indicated that the MMAH shall use the Tier 3 Water Budget information to ensure that municipal OP growth forecasts and distributions will not result in creating a SDWT in the policy areas. Although there are currently no designated growth areas for the Town of Erin, within these policy areas, the implications of the growth management and planning on any potential future land use changes should be clearly conveyed to the Town of Erin. Are there specific aspects of this policy that should concern the Town of Erin, if there were to be future develop nodes within these policy areas?</p>	<p>The intent of this policy is to ensure that MMAH, MOI, &amp; MOE are aware of the limitations to servicing within the Policy Areas.</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-4	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 supplying water within the Tier 3 Water Budget 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>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	2 years (T-16)	N/A	MON-1
DEM-4 Rev	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 supplying <del>the production, treatment and storage of</del> water within the Tier 3 Water Budget <del>Local Areas</del> <b>WHPA-Q1</b> 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><b>No Change</b></p>	<b>WHPA-Q1 with a significant risk level</b>	2 years (T-16)	<b>DEM-15</b>	MON-1

COMMENTS POLICY DEM-4	
Comments	CTC Response
<p><b>Halton Region</b></p> <p>A number of terms used in CTC Draft Proposed Water Quantity policies are also used in a number of Regional Planning documents, including Halton Region’s Official Plan. To ensure terminology is not misunderstood or taken out of context, the following terms/definitions needs to be defined in CTC’s SPP Glossary:</p> <ul style="list-style-type: none"> <li>• Effective Tool (DEM-4)</li> <li>• Sustainable Water Quantity (DEM-4)</li> </ul>	Noted. Will be added to Glossary

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

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DEM-5	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> Municipalities responsible for supplying water within any Tier 3 Water Budget Local Area 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> <ol style="list-style-type: none"> <li>1) Develop and implement education and outreach programs to ensure that property owners and businesses understand:                             <ol 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> </ol> </li> <li>2) Review any similar programs that may already exist and update them where necessary to ensure their effectiveness.</li> </ol>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	2 years (T-10)	GEN-6	MON-1
DEM-5 Rev	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> Municipalities responsible for <del>supplying the production, treatment and storage of</del> water within any Tier 3 Water Budget Local Areas WHPA-Q1 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> <ol style="list-style-type: none"> <li>1) Develop and implement education and outreach programs <b>and materials, to property owners and businesses focussing on:</b> <ol 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> </ol> </li> <li>2) Review any similar programs that may already exist and update them where necessary to ensure their effectiveness.</li> </ol>	WHPA-Q1 with a significant risk level	2 years (T-10)	DEM-16 GEN-6	MON-1

COMMENTS POLICY DEM-5		
	Comments	CTC Response
Town of Erin	If education and outreach programs are required for the portion of the policy areas within the Erin, it is assumed that Halton will develop and pay to administer these programs. Given the physical distance between Erin residents in Local Area C and the water taking in Georgetown, it would likely be a “hard sell” to indicate the residents should conserve water. Any potential education and outreach programs to residents within the Erin should be coordinated with the Town of Erin.	Noted.
Halton Region	DEM-5(1) The phrase: “ensure that property owners and businesses understand” creates complications because municipalities cannot ensure that residents understand education and outreach materials. This phrase should be changed to “The municipality shall deliver education and outreach materials and programs to property owners and businesses that have been identified as significant threats” or similar wording.	Change made

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-6	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 Local Area 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 Local Area A. The municipalities shall report to MOE and MMAH, on the options and proposed management model within 1 year of the approval of the Source Protection Plan.</p>	Local Area A (as identified in Tier 3 Water Budget for Orangeville, Amaranth and Mono)	See Policy	N/A	MON-1
DEM-6 Rev	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>Local Areas</del> <b>WHPA-Q1</b> 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>Local Area A</del> <b>WHPA-Q1</b>. The municipalities shall report to MOE and MMAH, on the options and proposed management model within 1 year of the approval of the Source Protection Plan.</p> <p><b>No Change</b></p>	<b>WHPA-Q1 with a significant risk level</b> (Orangeville, Amaranth and Mono)	See Policy	DEM-17	MON-1

COMMENTS POLICY DEM-6	
Comments	CTC Response
No Comments made	

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-7	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	MOE	K	<p><b>Specify Action</b> (Province to Support Joint Municipal Water Management System or Authority)</p> <p>The Ministry of the Environment, in collaboration with other affected provincial ministries and other agencies, as required, should initiate meetings with the municipalities that are wholly or partially within the Orangeville, Mono and Amaranth Tier 3 Local Area 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 MOE should provide technical support to the municipalities.</p>	Local Area (as identified in Assessment Reports and Tier 3 Water Budget for Orangeville, Amaranth and Mono)	See Policy	N/A	MON-4
DEM-7 Rev	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	MOE	K	<p><b>Specify Action</b> (Province to Support Joint Municipal Water Management System or Authority)</p> <p>The Ministry of the Environment, in collaboration with other affected provincial ministries and other agencies, as required, should initiate meetings with the municipalities that are wholly or partially within the Orangeville, Mono and Amaranth Tier 3 <del>Local Areas</del> WHPA-Q1 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 MOE should provide technical support to the municipalities.</p> <p><b>No change</b></p>	WHPA-Q1 with a significant risk level (Orangeville, Amaranth and Mono)	See Policy	N/A	MON-4
		SPA	E	<p><b>OR</b> (MOE suggested change)</p> <p>The <del>Source Protection Authority</del> with the assistance of MOE, and in collaboration with other affected provincial ministries and agencies as required, will initiate meetings with the municipalities that are wholly or partially within the Orangeville, Mono and Amaranth Tier 3 <del>Local Areas</del> WHPA-Q1 identified as having Significant Water Quality and Quantity Threats within 1 year, to support the municipalities in developing mutually beneficial solutions to address water quality and quantity constraints. Further, MOE should provide technical support to the municipalities.</p>				
		MOE	K	<p><b>OR</b> (South Georgian Bay Lake Simcoe - DEMD-6 Policy)</p> <p>Where municipalities share a water source within a WHPA-Q1 identified as having significant water quantity threats, the MOE, in collaboration with MOI, MMAH and MNR, is encouraged to support municipal efforts that focus on finding collaborative and mutually beneficial solutions to address water servicing constraints</p>				

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-7	
Comments	CTC Response
<p><b>MOE-1</b></p> <p>Please remove DEM-7 from both the submitted plan and pre-consultation policies or consider another implementing body. A principal of the CWA is local partnerships and collaboration; therefore it would be more appropriate for a local implementing body to take on the facilitation role to ensure decision-making and partnership-building is fostered at the local level. <b>(See next comment)</b></p>	<p>See below.</p>
<p><b>MOE-2</b></p> <p>Our previous comment to the SPC was to remove DEM-7 or to consider another implementing body. MOE is interested in providing a supportive role in the facilitation of this policy, ensuring that decision-making is fostered at the local level. Please consider the following revision to DEM-7:</p> <p>The Source Protection Authority (SPA) with the assistance of MOE, and in collaboration with other affected provincial ministries and agencies as required, will initiate meetings with the municipalities that are wholly or partially within the Orangeville, Mono and Amaranth Tier 3 Local Area identified as having Significant Water Quality and Quantity Threats within one (1) year, to support the municipalities in developing mutually beneficial solutions to address water quality and quantity constraints. Further, MOE should provide technical support to the municipalities.</p> <p>The legal effect of this policy would change from List K (non-legally binding) to List E (impose legal obligations on municipalities and/or SPAs).</p>	<p>CTC SPC discussion and direction required on Options</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-8	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	MOE	K	<p><b>Specify Action</b> (MOE to Adopt and Fund Maintenance of the Tier 3 Water Budget Model)</p> <p>The Ministry of Environment should adopt and fund a Tier 3 Water Budget Model for each Local Area identified as having 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 do not become significant drinking water threats:</p> <ol style="list-style-type: none"> <li>1) Through the Permit To Take Water program, require municipal takers in Local Areas identified as having significant water quantity threats to monitor water quantity and supply data on a regular basis to assist in the upkeep of the model;</li> <li>2) 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</li> <li>3) Contribute to funding for new continuous flow gauging stations in key surface water features and enhance Conservation Authorities existing Hydrometric Network in the Local Area 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.</li> </ol>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	2 years (T-15)	N/A	MON-4
DEM-8	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	MOE	<del>K</del> J	<p><del><b>Education and Outreach Specify Action</b></del> (MOE to Adopt and Fund Maintenance of the Tier 3 Water Budget Model)</p> <p>The Ministry of Environment should adopt and fund a Tier 3 Water Budget Model for each <del>Local Areas</del> <b>WHPA-Q1</b> identified as having 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 do not become significant <del>drinking water</del> <b>quantity</b> threats:</p> <ol style="list-style-type: none"> <li>1) Through the Permit To Take Water program, require municipal takers in <del>Local Areas</del> <b>WHPA-Q1</b> identified as having significant water quantity threats to monitor water quantity and supply data on a regular basis to assist in the upkeep of the model <del>to determine any increase or reduction in significant water quantity threats;</del></li> <li>2) <del>Run Use</del> the model <del>with using</del> the most up to date data <del>as an analysis and decision making tool, to analyze its predictions for water quantity issues and make necessary refinements to the model on an ongoing basis to reduce existing and avoid future significant water quantity threats;</del> and</li> <li>3) <del>When necessary</del> contribute to funding for new continuous flow gauging stations in key surface water features and enhance Conservation Authorities existing Hydrometric Network in the Local Area 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.</li> </ol>	<del>WHPA-Q1</del> <b>WHPA-Q1 with a significant risk level</b>	2 years (T-10 <del>15</del> )	<del>DEM-17</del>	MON-4

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-8		
	Comments	CTC Response
<b>MOE-1</b>	i. Parts 1 and 2: It is currently unclear how running and updating a model will achieve the outcome of ceasing to be a SDWT. Please consider rewriting this as an Education and Outreach policy. This could be easily achieved by beginning the policy with the phrase in accordance with the provisions of s. 22(7) of the CWA in both the submitted SPP and pre-consultation policies.	Change made
<b>MOE-1</b>	ii. Part 3: Please add the words when necessary to the statement referring to contributing funding for new flow gauging stations.	Change made
<b>Town of Erin</b>	This policy indicates the MOE should fund any updates to, and usage of the water budget model. It is assumed that the Town of Erin will not be required to provide data or funding to maintain the model, even if data collection (e.g. stream flows) was required within the Town of Erin. Could the SPC verify that the Town of Erin will not have to bear any costs to maintain the Water Budget Model?	Noted. The SPC cannot verify this. The policy is directed to the Ministry of the Environment to implement but we cannot direct the Ministry on how to do it. Any concerns that may arise in the future are a matter for discussion between the affected parties.
<b>Halton Region</b>	MOE should consider providing funding to the municipalities in order to carry out proper updates to the Tier 3 Water Budget model which could be used to evaluate existing and future PTTW.	CTC will provide the comment to MOE for consideration.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-9	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 Local Area 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>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	See Policy	N/A	MON-1
DEM-9 Rev	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 <del>Local Areas</del> WHPA-Q1 identified as having significant water quantity threats are encouraged to identify additional water sources outside of the <del>Local Area</del> WHPA-Q1 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><b>No change</b></p>	WHPA-Q1 with a significant risk level	See Policy	DEM-18	MON-1

COMMENTS POLICY DEM-9		
	Comments	CTC Response
CTC Staff	<p>CTC Staff recommend text be added as part of the Explanatory Document clarifying that this policy is not intended to promote the introduction of lake-based supplies nor to conflict with the Greenbelt Plan policies. Rather the municipality is encouraged to locate new or expanded water supplies outside of a WHPA-Q1 with a significant risk level or a WHPA-Q1 with a moderate risk level where the new or increased taking would create significant water quantity impacts.</p>	<p>Recommendation to Committee for addition to Explanatory Document</p>
MOE-1	<p>Extending lake-based servicing within the Greenbelt Area, where the WHPA Q1 and Q2 areas are located within CTC is contrary to the Greenbelt Plan (2005). Infrastructure Section 4.2.2, sewage and water infrastructure policies indicates:</p> <p><i>Where settlements do not currently have Great Lake or Lake Simcoe based water and sewage services, extensions to or expansions of existing Great Lake or Lake Simcoe based services to such settlements is not permitted, unless such servicing is required to address failed individual on-site sewage or water services or to ensure the protection of public health where it has been determined by a medical officer of health (or health authority) that there is a public health concern associated with existing services within the settlement.</i></p> <p>Please remove this policy, or modify the policy to exclude lake-based servicing in the Greenbelt Area.</p>	<p>Comment Noted. Propose addition to the Explanatory Document for clarification.</p>
Halton Region	<p>Clarification required as unclear how identification and operation of additional water supplies outside of the Local Area would impact water quantity inside the Local Area. Also, at what stage of identification of a drinking water source is the 3 year reporting requirement required (approved Class EA or in-service date of new well)?</p>	<p>Further direction is required from MOE about how new or expanded water supplies are to be dealt with in the SPP (and AR)</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-10 (New draft policy)</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	MNR	C	<p><b>Prescribed Instruments</b> (Aggregate licence, site plan and wayside permit Policies in Local Areas with Quantity-related Significant Drinking Water Threats)</p> <p>Within the Tier 3 Water Budget Local Areas identified as having significant water quantity threats the Ministry of Natural Resources, for each licence, site plan and wayside permit for the extraction of aggregate resources that could adversely affect the quantity of municipal drinking water sources by means of water taking, dewatering or below water table extraction activities, shall ensure that any 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 licences, site plans and wayside permits, as well as Permits To Take Water in consultation with the Ministry of Environment, the affected Municipality and relevant Conservation Authorities, and amend the permits where necessary to ensure:</p> <ul style="list-style-type: none"> <li>a) that municipal water supply requirements for the current and planned service capacity (per the current approved population projections of the most recent Growth Plan for the Greater Golden Horseshoe) will be met on a sustainable basis; and</li> <li>b) that the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems in the Local Area will be maintained.</li> </ul> <p>2) Issuing new licences, site plans or wayside permits for aggregate extraction where water taking, de-watering or below water table extraction is to occur only if it can be satisfactorily demonstrated, using Tier 3 Water Budget Model where appropriate, 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, or interfere with other permitted takings; and</li> <li>c) will ensure the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</li> </ul>	Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)	<p>Future: Immediately</p> <p>Existing: 3 years</p>	GEN-5	MON-4

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-10 Rev</b>		MNR	C	<b>Delete Policy DEM-10</b>	WHPA-Q1	<p>Future: Immediately</p> <p>Existing: 3 years</p>	GEN-5	MON-4

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY DEM-10		
	Comments	CTC Response
<b>MOE-1</b>	<p>This policy directs MNR to use Prescribed Instruments under the Aggregate Resources Act to ensure any water taking associated with aggregate extraction ceases to be a significant drinking water threat. Under the CWA, only consumptive water takings are considered a drinking water threat and all consumptive water takings associated with an extraction site are governed by the OWRA, not the Aggregate Resources Act.</p> <p>The MOE is the agency responsible for the administration of the PTTW program under the OWRA. As a result, where this policy refers to "water taking" and "dewatering", and "Permits to Take Water", these responsibilities should be directed to the MOE, not the MNR. We note that these MOE regulated activities already appear to be addressed by DEM-1. For the above reasons, please remove DEM-10 from the pre-consultation policies.</p>	<p>Change made. Refer to DEM-1 for these concerns to be addressed.</p> <p>Added to 'in consultation with <b>other Ministries, as required...</b>'</p>
<b>MNR</b>	<p>The MOE is the agency responsible for the administration of the Permit to Take Water program, under the Ontario Water Resources Act. As a result, where this policy refers to "water taking" and "dewatering", and "Permits to Take Water", these responsibilities should be directed to the MOE, not the MNR. We note that these MOE regulated activities already appear to be addressed by DEM-1. In light of the above, please consider removing policy DEM-10.</p>	Change made
<b>MHBC Plan</b>	<p>We are concerned with the wording of DEM-10 as it would require the MNR to review all existing licences and site plans within the Local Areas to determine if extraction activities were adversely affecting the quantity of municipal drinking water sources and to ensure that any water taking threat ceases to be or does not become significant. It is our opinion that this matter is more appropriately addressed through the review and issuance of PTTW by the MOE which is already covered in policy DEM-1. It is our understanding that utilizing PTTW is the proposed approach in other areas of the Province with SDWTs.</p>	Change made
<b>MHBC Plan</b>	<p>With respect to extraction proposed below the water table, the Aggregate Resources Act requires that technical studies determine whether there is potential for adverse effects to groundwater and surface water resources and their uses. If there is potential, an impact assessment is required to determine the significance of the effect and feasibility of mitigation. The PTTW process provides the appropriate avenue to assess and determine the significance of potential quantity threats.</p>	Change made
<b>OSSGA</b>	<p>The wording of draft policy DEM-10 is a matter of concern because it is placing the onus on the MNR to carry out a task that should reside with the Permit to Take Water approval process, administered by the Ministry of Environment. Draft policy DEM-1 already covers the issue and taking this approach would align with what other areas of the Province are doing to respond to significant water quantity threats.</p> <p>Policy DEM-10, directed to the Ministry of Natural Resources (MNR), identifies aggregate licenses, site plans and wayside permits as prescribed instruments; however, the proposed CTC Source Water Protection Plan does not list these as prescribed instruments under any other threat except for the handling and storage of fuel.</p>	Noted.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-11 NEW	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>Within the WHPA-Q1 identified as having a moderate risk level the municipality responsible for water production, treatment and storage shall develop and implement management measures using the Tier 3 water quantity risk assessment findings and modeling tool to prevent consumptive demand from becoming significant.</p>	WHPA-Q1 with a moderate risk level	<p>Future: Immediately</p> <p>Existing: 3 years</p>	N/A	MON-1

SUBSEQUENT COMMENTS	
Comments	
NEW York Tier 3	Tier 3 risk scenarios were modeled with and without implementing possible risk management measures to assess how the predicted stress level might change. Implementing risk management measures reduced the stress level for WHPA-Q1 to moderate from significant in the York/Durham Local Area. This proposed policy is intended to require the municipality to formally implement the risk management measures as part of its operations to prevent the risk level from becoming significant.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-12 NEW</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	MOE	C	<p><b>Prescribed Instrument</b> (PTTW Policies in WHPA-Q1 with Moderate Water Quantity Threats)</p> <p>Within the Tier 3 Water Budget WHPA-Q1 identified as having moderate water quantity threats the Ministry of Environment should ensure each water taking threat does not become significant through actions the Director considers appropriate on a case by case basis, such as:</p> <ol style="list-style-type: none"> <li>1) Reviewing all existing Permits To Take Water, in consultation with other Ministries (as required), the affected Municipality and relevant Conservation Authorities, and amend the permits where necessary to ensure:                             <ol style="list-style-type: none"> <li>a) that municipal water supply requirements for the allocated and planned quantity (per the current approved population and employment projections of the most recent Growth Plan for the Greater Golden Horseshoe) will be met on a sustainable basis; and</li> <li>b) that the hydrological integrity of municipal wells in the WHPA-Q1 will be maintained.</li> </ol> </li> <li>2) Issuing Permits To Take Water for new or increased takings only if it can be satisfactorily demonstrated, using most recently approved Tier 3 Water Budget Model where appropriate, that the taking:                             <ol 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; and</li> <li>c) will ensure the hydrological integrity of municipal wells will be maintained.</li> </ol> </li> </ol>	WHPA-Q1 with a moderate risk level	Future: Immediately (T-3)  Existing: 3 years (T-1)	DEM-1	MON-4

SUBSEQUENT COMMENTS	
	Comments
<b>MOE</b>	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-13</b> <b>NEW</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	Planning Approval Authority	A	<p><b>Land Use Planning</b> (Planning Policies in WHPA-Q1 with Moderate Water Quantity Threats)</p> <p>Within the Tier 3 Water Budget WHPA-Q1 identified as having moderate water quantity threats the relevant Planning Approval Authority shall ensure water taking does not become a significant water quantity threat by:</p> <ol style="list-style-type: none"> <li>1) Only permitting new development or site alteration if the following applies:                             <ol style="list-style-type: none"> <li>a) the development or site alteration is minor as determined per the Planning Approval Authority, including not requiring a new/amended PTTW; or</li> <li>b) it can be satisfactorily demonstrated that the increase in water demand can be accommodated on a sustainable basis; and</li> <li>c) the hydrological integrity of municipal wells will be maintained.</li> </ol> </li> <li>2) 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:                             <ol style="list-style-type: none"> <li>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</li> <li>b) the hydrological integrity of municipal wells will be maintained.</li> </ol> </li> <li>3) Only approving settlement area expansions, within WHPA-Q1, as part of a municipal comprehensive review where the applicable provincial planning criteria have been met and the following has been demonstrated:                             <ol 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 hydrological integrity of municipal wells will be maintained.</li> </ol> </li> </ol>	WHPA-Q1 with a moderate risk level	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	DEM-2	MON-1

SUBSEQUENT COMMENTS	
	Comments
<b>MOE</b>	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-14</b> <b>NEW</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	MMAH MOI MOE	K	<p><b>Specify Action</b> (Growth Management/Planning Ministries to Review Growth in WHPA-Q1 with Moderate Water Quantity Threats)</p> <p>Within any Tier 3 Water Budget WHPA-Q1 identified as having a moderate risk level the Provincial Ministries specified below shall undertake the following to ensure municipal population and employment growth forecasts and distributions are sustainable based on available water systems:</p> <p>1) 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 water quantity threat, given water quantity constraints identified in Tier 3 Water Budget model areas; and</p> <p>2) The Ministry of Infrastructure shall take into consideration water quantity constraints identified through Tier 3 water budgets during its review of the population forecasts contained in the Growth Plan for the Greater Golden Horseshoe, in consultation with relevant municipalities.</p>	WHPA-Q1 with a moderate risk level	2 years (T-15)	DEM-3	MON-4

SUBSEQUENT COMMENTS	
Comments	
<b>MOE</b>	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-15 NEW	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 and storage of water within the Tier 3 Water Budget WHPA-Q1 identified as having a moderate risk level 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>	WHPA-Q1 with a moderate risk level	2 years (T-16)	DEM-4	MON-1

SUBSEQUENT COMMENTS	
Comments	
MOE	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-16 NEW	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 the production, treatment and storage of water within any Tier 3 Water Budget WHPA-Q1 identified as having a moderate risk level 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> <ol style="list-style-type: none"> <li>1) Develop and implement education and outreach programs and materials to property owners and businesses focussing on:                             <ol 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> </ol> </li> <li>2) Review any similar programs that may already exist and update them where necessary to ensure their effectiveness.</li> </ol>	WHPA-Q1 with a moderate risk level	2 years (T-15)	DEM-5	MON-1

SUBSEQUENT COMMENTS	
Comments	
MOE	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>DEM-17</b> <b>NEW</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	MOE	J	<p><b>Education and Outreach</b> (MOE to Adopt and Fund Maintenance of the Tier 3 Water Budget Model)</p> <p>The Ministry of Environment should adopt and fund a Tier 3 Water Budget Model for each WHPA-Q1 identified as having a moderate risk level 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 do not become significant water quantity threats:</p> <ol style="list-style-type: none"> <li>1) Through the Permit To Take Water program, require municipal takers in WHPA-Q1 identified as having significant water quantity threats to monitor water quantity and supply data on a regular basis to assist in the upkeep of the model to determine any increase or reduction in significant water quantity threats;</li> <li>2) Use the model with the most up to date data as an analysis and decision making tool to reduce or avoid future significant water quantity threats; and</li> <li>3) When necessary contribute to funding for new continuous flow gauging stations in key surface water features and enhance Conservation Authorities existing Hydrometric Network in the Local Area 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.</li> </ol>	WHPA-Q1 with a moderate risk level	2 years (T-15)	<b>DEM-8</b>	MON-4

SUBSEQUENT COMMENTS	
	Comments
<b>MOE</b>	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
DEM-18 NEW	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 WHPA-Q1 identified as having a moderate risk level are encouraged to identify additional water sources outside of the WHPA-Q1 to reduce demand from well systems which have been identified with moderate water quantity stress and to report to the Source Protection Authority within 3 years on their progress.</p>	WHPA-Q1 with a moderate risk level	See Policy	DEM-9	MON-1

SUBSEQUENT COMMENTS	
	Comments
CTC Staff	<p>CTC Staff recommend text be added as part of the Explanatory Document clarifying that this policy is not intended to promote the introduction of lake-based supplies nor to conflict with the Greenbelt Plan policies. Rather the municipality is encouraged to locate new or expanded water supplies outside of a WHPA-Q1 with a significant risk level or a WHPA-Q1 with a moderate risk level where the new or increased taking would create significant water quantity impacts.</p>
MOE	<p>New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q1 with moderate risk level.</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

<p><b>REC-1</b></p>	<p>An activity that reduces recharge to an aquifer</p>	<p>Planning Approval Authority</p>	<p>A</p>	<p><b>Land Use Planning</b> (Planning Policies for Protecting Groundwater Recharge)</p> <p>Within the Tier 3 Water Budget 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) Only permitting new development and site alteration that has the potential to reduce recharge to an aquifer under the following conditions:</p> <ul style="list-style-type: none"> <li>a) the development or site alteration is minor in nature per the following: <ul style="list-style-type: none"> <li>i) 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</li> <li>ii) 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.</li> </ul> </li> <li>b) 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.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>a) impervious surfaces are minimized;</li> <li>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;</li> <li>c) lot conveyance and/or end of pipe storm water management measures are used that emphasize lot level infiltration of clean water wherever appropriate;</li> <li>d) where water balance cannot be achieved on the development site, off-site compensation opportunities are explored and implemented where feasible; and</li> <li>e) where sodium and chloride have been identified as "issues", no further degradation of water quality by salt run-off infiltration shall occur.</li> </ul> <p>3) Only approving settlement area expansions as part of a municipal comprehensive review where it has been demonstrated that recharge functions and surface water flow regimes will be maintained on lands designated significant groundwater recharge areas within Local Area A; and</p> <p>4) Amending municipal planning documents to require the protection of lands demonstrated to have significant recharge functions, including recharge from surface water features such as streams or wetlands.</p>	<p>Tier 3 Water Budget Local Areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)</p>	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	<p>N/A</p>	<p>MON-1</p>
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CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
REC-1 Rev	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>Within the Tier 3 Water Budget <b>WHPA-Q2</b> 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 <b>drinking water quantity</b> threat by:</p> <p>1) Requiring for <b>major development</b> the submission of a satisfactory hydrogeological study which demonstrates that <b>predevelopment</b> recharge <del>and surface water flow regimes</del> will be maintained and current PTTW allocations can be sustained. <del>and the ecological and hydrological integrity of key hydrologic features, functions and aquatic systems will be maintained.</del> The assessment of hydrogeological impacts should consider the use of the Tier 3 Water budget Model where appropriate. <b>Major Development is the construction of a building or buildings on a lot with a ground floor area cumulatively equal to or greater than 500 square metres (5382 square feet); and any other impervious surfaces (e.g. road and/or parking area) cumulatively equal to or greater than 500 square metres (5382 square feet; excluding on-site sewage systems, barns and non-commercial structures that are accessory to an agricultural operation).</b></p> <p>2) Requiring use of Best Management Practices such as Low Impact Development (LID) to maintain pre development recharge <del>and surface water flow regimes</del> in support of all new development and site alteration to ensure that the following criteria are met:</p> <ul style="list-style-type: none"> <li>a) impervious surfaces are minimized;</li> <li>b) water balance on the site is managed such that predevelopment rates of infiltration of clean water are maintained <del>in the post-development state</del> to the <b>greatest</b> extent feasible;</li> <li>c) lot conveyance and/or end of pipe storm water management measures are used that emphasize lot level infiltration of clean water wherever appropriate; and</li> <li>d) where water balance cannot be achieved on the development site, off-site recharge compensation is implemented <del>where feasible</del> <b>within the same WHPA-Q2.</b></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 <b>Local Area A-WHPA-Q2</b>; and</p> <p>4) Amending municipal planning documents to require <b>maps showing the Significant Groundwater Recharge Areas within WHPA-Q2 and policies to ensure maintaining recharge to protect the municipal water supply.</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>	<b>WHPA-Q2 with a significant risk level</b>	<p>Future: Immediately (T-9)</p> <p>Amend OPs and ZBLs for conformity within 5 years (T-8)</p>	<b>REC-5</b>	<b>MON-1</b>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY REC-1		
	Comments	Response
<b>CTC Staff</b>	<i>Add to Explanatory Document clarification: In regards to definition of Major Development, commercial enterprise eg. Retail outlet on agricultural properties, is not included in this exclusion.</i>	<i>Recommendation to Committee for addition to Explanatory Document</i>
<b>MOE-1</b>	i. LUP is only for future site development and/or site alteration, therefore another policy needs to be added or policies need to be modified in both the submitted proposed SPP and pre-consultation policies to address existing threats. Some possible revisions for SPA consideration could be: <ul style="list-style-type: none"> <li>• Adding an Education and Outreach (EO) policy which focuses on maintaining or improving recharge in areas where recharge is a SDWT. The EO could include items such as downspout disconnection program, the use of pervious pavement or other material, or discouraging the paving of front lawns.</li> <li>• Modifying policy GEN-6 to specifically include recharge.</li> </ul>	See proposed NEW REC-3 See proposed NEW REC-4 Will revise GEN-6
<b>MOE-1</b>	ii. Part 1(a),(b) and Part 3: Please remove references to “surface water flow regime” as they are not subject to policies under the CWA.	Change made
<b>MOE-1</b>	iii. Part 1(b): Please clarify the area that “recharge functions will be maintained” by including the text in the vulnerable area.	Change made
<b>MOE-1</b>	iv. Part 2 (b): The statement regarding “maintaining post-development recharge” could easily be misinterpreted. Please consider revising the policy to ensure the predevelopment recharge rate is maintained.	Change made
<b>MOE-1</b>	v. Part 2 (e): It is unclear how no further degradation to water quality by salt run-off infiltration could be implemented using the land use planning system. In addition, the policy itself does not address water quantity threats, but we understand it may have been included to address conflicting challenges related to maintaining infiltration while addressing water quality issues. Please consider amending this policy to clarify what threats are being addressed through the policy, and amend your ED to provide an explanation and rationale for the policy.	See REC-2 below
<b>MOE-1</b>	vi. Part 4: The use of “protection of lands” is a vague term and it is unclear on how this outcome would be achieved by the municipalities implementing this policy. In the pre-consultation policies, please consider whether this part of the policy may be too vague when under appeal before the Ontario Municipal Board, and make any necessary changes to the pre-consultation policies.	Revision suggested. Committee discussion recommended. May require further discussion with MOE staff.
<b>Halton Region</b>	<p>We support the intent of the proposed policy to control the amount of site alteration which may increase lot coverage (i.e. lot imperviousness) in a manner that may avoid potential significant reductions in recharge to nearby aquifers.</p> <p>The majority of existing smaller lot size (i.e. half an acre) outside of the settlement area already likely exceed the 10% lot imperviousness threshold (via existing house, garage, driveway coverage on the properties) as indicated by sample property lot coverages shown in Attachment # 2. Any future site alteration (i.e. constructing a shed) or development (i.e. pool) would require landowner to undertake an onerous and costly hydrogeological study. Such changes in coverage on small lots would be unlikely to significantly impact further reductions in recharge to nearby aquifers. Conversely, large rural properties (i.e. lot sizes greater than 3 acres) which typically have a small impervious lot coverage, would be able to develop extremely large areas under this policy as indicated by sample property shown in Attachment #3. In this case, the reduction in imperviousness could be quite detrimental to the potential recharge to an aquifer and would not support the intent of the policy.</p> <p>Although the Ontario Building Code doesn’t regulate lot coverage, several zoning standards, such as minimum setbacks for buildings, maximum accessory building sizes, maximum driveway widths, minimum landscaped area requirements and self-sustaining lot requirements, currently serve to regulate development and/or site alteration on a properties within the Local Areas A and C. In addition, existing legislation, such as the Greenbelt Plan, Niagara Escarpment Commission, and municipal Official Plans currently restricts new development and/or site alteration in areas that overlap with the Local Areas A and C where an activity that potentially reduces recharge to an aquifer is identified as a significant threat. Staff note that these standards and legislative requirements collectively ensure that there will be a significant permeable area maintained on smaller properties and; therefore, the proposed need to restrict lot coverage to 10% is redundant and not necessary. As such, the concept of a 10% lot coverage limit (imperviousness) needs</p>	Staff recommend revision to policy to define Major development and remove 10% threshold for minor development

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

COMMENTS POLICY REC-1		
	Comments	Response
	<p>to be reconsidered or eliminated entirely.</p> <p>It would also be difficult and time consuming for the homeowner and Region/Local Municipality to accurately calculate the total impervious area on a lot without requiring a survey (i.e. R-plan), which would be a significant cost to the property owner. Furthermore, the minimal impacts of additional impervious coverage on such small lots do not landowner costs associated with a hydrogeological study required.</p> <p>While we support the intent of this policy, it would be difficult for municipalities to implement and landowners to demonstrate compliance to this policy. We do not support the use of an impervious lot threshold since zoning standards and legislation that currently exist adequately manage and regulate lot imperviousness. Staff maintains that the implementing body which has the jurisdiction to regulate an activity under existing legislation should be left to do so.</p>	
Halton Region	<p>A number of terms used in CTC Draft Proposed Water Quantity policies are also used in a number of Regional Planning documents, including Halton Region's Official Plan. To ensure terminology is not misunderstood or taken out of context, the following terms/definitions needs to be defined in CTC's SPP Glossary:</p> <ul style="list-style-type: none"> <li>• New Development (REC-1); Ecological and hydrological integrity (REC-1); Clean water (REC-1); Protection (REC-1)</li> </ul>	Noted. Recommend definition
Halton Region	<p><b>REC-1 (1)(b)</b> Applicability of policy should be consistent with those in DEM-1 and DEM-2 in that it only applies to ensuring the hydrological integrity of recharge functions be maintained. Reference to surface water flow regime, ecological integrity and key hydrologic features, functions and aquatic systems should be removed.</p>	Noted
Halton Region	<p><b>REC-1(2)(c)</b> It appears that there are some words missing or that should be removed, i.e. emphasize lot level infiltration should read "emphasize infiltration"</p>	Noted
Halton Region	<p><b>REC-1(2)(e)</b> Halton Region and its municipalities believe that this policy is not applicable to water quantity (i.e. relates only to water quality issues) and should be removed. Agree with MOE that is still quite unclear how through a land use planning tool we are to ensure that no further degradation of water quality occurs through infiltration of storm water containing sodium or chloride (i.e. an activity).</p>	Noted. SEE proposed NEW REC-2 and 3 below
Halton Region	<p><b>REC-1(3)</b> This policy requires that in order to approve settlement expansions, proponents must maintain "recharge functions and surface water flow regimes". Clarity is needed on how this requirement is to be properly demonstrated.</p>	More clarity needed
Halton Region	<p><b>REC-1(4)</b> If this policy is referring to Local Area A &amp; C, then the majority of the vulnerable area is located with the Greenbelt Plan and NEC Plan Area that does not permit development other than rural residential (one house on one property) or agriculture use. A large portion of this area is located in the Region's Natural Heritage System and already regulated by ROPA 38 (i.e. development not permitted). As considerable legislation already exists to protect land recharge functions and control the location of development, the need to amend municipal planning documents is redundant. This policy is not supported by Halton Region.</p>	The intent of the policy is to capture existing and potential future areas that are or may be Local Areas.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-2</b> <b>NEW rev</b>	An activity that reduces recharge to an aquifer	Planning Approval Authority	A	<b>Land Use Planning</b> (Planning Policies for Protecting Groundwater Recharge)  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 or Chloride require the submission of a report that demonstrates how recharge will be maintained and water quality is protected.	Part of WHPA-Q2 identified as an ICA for Sodium or Chloride	Future: Immediately (T-9)  Amend Ops and ZBLs for conformity within 5 years (T-8)	SWG-12 SAL-3	MON-1

COMMENTS POLICY REC-1		
	Comments	Response
<b>MOE-1</b>	v. Part 2 (e): It is unclear how no further degradation to water quality by salt run-off infiltration could be implemented using the land use planning system. In addition, the policy itself does not address water quantity threats, but we understand it may have been included to address conflicting challenges related to maintaining infiltration while addressing water quality issues. Please consider amending this policy to clarify what threats are being addressed through the policy, and amend your ED to provide an explanation and rationale for the policy.	Change made in discussion with MOE staff <i>Make a separate policy to clarify that it applies in only the WHPA-Q2 areas which are also an ICA for sodium or chloride</i> Have also proposed new Part IV policy (REC-3) to deal with existing and future threats not captured by land use planning tools.  Will add information to the Explanatory Document.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-3</b> <b>NEW</b>	An activity that reduces recharge to an aquifer	RMO	H	<p><b>Part IV, s.58</b></p> <p>Within a Tier 3 Water Budget WHPA-Q2, an activity that reduces the recharge to an aquifer at non-residential or multi-unit residential properties is designated for the purpose of s.58 under the Clean Water Act, requiring risk management plans, where the threat is, or 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	<p>Future: Immediately (T-7)</p> <p>Existing: 1 year/ 5 years (T-6)</p>	GEN-1 REC-6	MON-2

COMMENTS POLICY REC-1		
Comments	Response	
<b>MOE-1</b>	<p>i. LUP is only for future site development and/or site alteration, therefore another policy needs to be added or policies need to be modified in both the submitted proposed SPP and pre-consultation policies to address existing threats.</p>	<p>Proposed Part IV tool to deal with existing activities and those future activities not captured by planning tool.</p> <p>Staff to develop a definition of multi-unit residential to add to glossary.</p>

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-4 NEW</b>	An activity that reduces recharge to an aquifer	Municipality	E	<p><b>Education and Outreach</b></p> <p>Within a Tier 3 Water Budget WHPA-Q2 the municipalities shall develop and implement an action plan, including actions to be taken and an implementation schedule, to ensure that existing aquifer recharge reduction ceases to be a significant water quantity threat.</p> <p>The action plan may include:</p> <p>a) Reviewing options to maximize maintenance of aquifer recharge;</p> <p>b) Developing an education and outreach program to inform property owners about actions to maintain aquifer recharge (e.g., downspout disconnection). The municipality could create an incentive program (such as rebates) to encourage best management practices;</p> <p>c) Encourage retrofit and Low Impact Development (LID).</p>	WHPA-Q2 with a significant risk level	<b>Implement within 2 years NEW</b>	GEN-6 <b>REC-7</b>	MON-1

<b>COMMENTS POLICY REC-1</b>		
	<b>Comments</b>	
	<b>Response</b>	
<b>MOE-1</b>	<p>Some possible revisions for SPA consideration could be:</p> <ul style="list-style-type: none"> <li>• Adding an Education and Outreach (EO) policy which focuses on maintaining or improving recharge in areas where recharge is a SDWT. The EO could include items such as downspout disconnection program, the use of pervious pavement or other material, or discouraging the paving of front lawns.</li> <li>• Modifying policy GEN-6 to specifically include recharge.</li> </ul>	GEN-6 will be modified as suggested

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
REC-5 NEW	<b>Significant Threat</b> 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>Within the Tier 3 Water Budget WHPA-Q2 identified as having moderate risk level the relevant Planning Approval Authority shall ensure recharge reduction does not become a significant water quantity threat by:</p> <p>1) Requiring for <i>major development</i> the submission of a satisfactory hydrogeological study which demonstrates that predevelopment recharge will be maintained and current PTTW allocations can be sustained. The assessment of hydrogeological impacts should consider the use of the Tier 3 Water budget Model where appropriate. <i>Major Development</i> is the construction of a building or buildings on a lot with a ground floor area cumulatively equal to or greater than 500 square metres (5382 square feet); and any other impervious surfaces (e.g. road and/or parking area) cumulatively equal to or greater than 500 square metres (5382 square feet; excluding on-site sewage systems, barns and non-commercial structures that are accessory to an agricultural operation.</p> <p>2) Requiring use Best Management Practices such as Low Impact Development (LID) to maintain pre development recharge in support of all new development and site alteration to ensure that the following criteria are met:</p> <ul style="list-style-type: none"> <li>a) impervious surfaces are minimized;</li> <li>b) water balance on the site is managed such that predevelopment rates of infiltration of clean water are maintained to the greatest extent feasible;</li> <li>c) lot conveyance and/or end of pipe storm water management measures are used that emphasize lot level infiltration of clean water wherever appropriate; and</li> <li>d) where water balance cannot be achieved on the development site, off-site recharge compensation is implemented within the same WHPA-Q2.</li> </ul> <p>3) Only approving settlement area expansions as part of a municipal comprehensive review where it has been demonstrated that recharge functions will be maintained on lands designated significant groundwater recharge areas within WHPA-Q2; and</p> <p>4) Amending municipal planning documents to require maps showing the Significant Groundwater Recharge Areas within WHPA-Q2 and policies to ensure maintaining recharge to protect the municipal water supply.</p>	WHPA-Q2 with a moderate risk level	Future: Immediately (T-9)  Amend OPs and ZBLs for conformity within 5 years (T-8)	REC-1	MON-1

SUBSEQUENT COMMENTS	
Comments	
MOE	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q2 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-6</b> <b>NEW</b>	An activity that reduces recharge to an aquifer	RMO	H	<p><b>Part IV, s.58</b></p> <p>Within a Tier 3 Water Budget WHPA-Q2, identified as having moderate risk level an activity that reduces the recharge to an aquifer at non-residential or multi-unit residential properties is designated for the purpose of s.58 under the Clean Water Act, requiring risk management plans 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 moderate risk level	Future: Immediately (T-7)	GEN-1 REC-3	MON-2

<b>SUBSEQUENT COMMENTS</b>								
<b>Comments</b>								
New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q2 with moderate risk level.								

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

Policy ID	Threat Description	Implementing Body	Legal Effect	Policy	Where Policy Applies	When Policy Applies	Related Policies	Monitoring Policy
<b>REC-7 NEW</b>	An activity that reduces recharge to an aquifer	Municipality	E	<p><b>Education and Outreach</b></p> <p>Within a Tier 3 Water Budget WHPA-Q2 the municipalities should develop and implement an action plan, including actions to be taken and an implementation schedule to ensure that future activities do not become significant quantity threats.</p> <p>The action plan may include:</p> <ul style="list-style-type: none"> <li>a) Reviewing options to maximize maintenance of aquifer recharge;</li> <li>b) Developing an education and outreach program to inform property owners about actions to maintain aquifer recharge (e.g., downspout disconnection). The municipality could create an incentive program (such as rebates) to encourage best management practices;</li> <li>c) Encourage retrofit and Low Impact Development (LID).</li> </ul>	WHPA-Q2 with a moderate risk level	<b>Implement within 2 years NEW</b>	REC-4	MON-1

<b>SUBSEQUENT COMMENTS</b>	
<b>Comments</b>	
<b>MOE</b>	New MOE Technical Rule interpretation requires that SPC writes policies to prevent future activities from becoming significant threat in a WHPA-Q2 with moderate risk level.

CTC Proposed Source Protection Plan – Review of Water Quantity Policy Comments

GENERAL COMMENTS		
	Comments	CTC Response
MOE-1	The description of where the policy applies is indicated as “Local Area (as identified in Tier 3 Water budget)” in the submitted proposed plan, and “Tier 3 water budget local areas (where identified as Significant Drinking Water Quantity Threats in Assessment Reports)” in the pre-consultation policies. The legislation requires that a vulnerable area be indicated for each policy, therefore please ensure that each policy is directed to <u>WHPA Q1 (to address an activity that takes water from an aquifer or surface water without returning the water to the same aquifer or water body)</u> and/or <u>WHPA Q2 (to address an activity that reduces recharge to an aquifer)</u> instead of using the term “local areas” for both the submitted proposed SPP and pre-consultation policies.	Change made.
Halton Region	The Ministry of the Environment should continue with and increase the funding of the Ontario Drinking Water Stewardship Program in order to assist affected landowners with implementation of water conservation projects to align with municipal efforts to increase the effectiveness of water conservation throughout Halton Region. This program would be instrumental in building support for the Source Protection Program and must be continued to ensure successful policy implementation and continued protection of our drinking water sources.	Noted.
Halton Region	During each consultation stage of CTC’s Proposed Source Protection Plan (SPP), Halton Region and its local municipalities have expressed the need to the CTC SPC and the MOE for provincial funding for Source Protection implementation. Provincial funding support for plan implementation of SPPs including both water quality and water quantity is paramount to the success of the Source Protection Program.	Noted
Halton Region	Once SPPs are approved municipalities may be placed in the vulnerable position of defending costly OMB challenges on official plan amendments and zoning by-law amendments to meet SPP conformity requirements. We are aware that a right to dispute the Minister of the Environment’s approval of SPPs to the OMB is not enabled within the CWA. However, the legislation does not exempt any SPP conformity amendments for official plans and zoning by-laws from appeal to the OMB.  This exemption is financially punitive to municipalities and such appeal costs should not be borne by the municipalities. As such, staff recommends that the Province amend the CWA and the Planning Act to remove the right of a third party appeal for any SPP conformity amendments to an official plan or zoning by-law. The Town of Halton Hills recently passed a resolution (Resolution No. 2012-0092) requesting that the Province exempt municipal conformity exercise resulting from SPPs from appeals to the OMB.	MMAH is holding public consultation on this issue. The commenting period ends Jan 10, 2014.
Halton Region	Education and Outreach tools to address significant drinking water threats should be developed and standardized by the Province and provided to policy implementers in a timely manner in order for consistent use and application.	Noted
NEC	Given that the NEC is identified as an implementing body, it would be useful to identify the Niagara Escarpment Plan Area on Source Protection mapping.	Noted – Recommend a Map be included.
NEC	NEPs existing policies may, in some circumstances, be more restrictive than those proposed in the SPP, and, therefore, it should be noted that the most restrictive policy will prevail.	Noted – This note should be made regarding Provincial Policies and order of ‘operation’.
NEC	Staff question how the CTC SPC envisions planning approval authorities, such as the NEC, will achieve some of the proposed policies and who will be the responsible body. For example, does the SPC foresee that the NEC would be responsible for requiring the use of LID guidelines and techniques for managing stormwater in the NEP Area (REC-12)? Is the NEC responsible for requiring the protection of lands that have been demonstrated to have significant recharge functions (REC-1 4)? In this respect the NEC has limited capacity to implement policy changes that would require monitoring, reporting, new programs, site visits, or the like and, therefore, we must rely on the expertise of municipal and CA staff for source protection-related matters.	The Implementing body will be the required organization to ensure the policy is implemented as required.