

Attachment 6: TRCA Submission on ERO_019-4978

March 11, 2022

BY E-MAIL ONLY (mecp.landpolicy@ontario.ca)

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Re: Proposed Subwatershed Planning Guide (ERO #019-4978)

Thank you for the opportunity to comment on the proposed Subwatershed Planning Guide (herein referred to as “the Guide”) posted to the Environmental Registry of Ontario by the Ministry of Environment Conservation and Parks (MECP).

The Toronto and Region Conservation Authority (TRCA) has an ongoing interest and responsibility in watershed management and conducts itself in accordance with the objects, powers, roles, and responsibilities set out for conservation authorities (CA) under the *Conservation Authorities Act* (CA Act) and the Ministry of Natural Resources and Forestry’s Procedural Manual chapter on CA policies and procedures for plan review and permitting activities. TRCA is:

- A public body under the *Planning Act* and *Environmental Assessment Act*;
- An agency delegated the responsibility to represent the provincial interest on natural hazards under Section 3.1 of the Provincial Policy Statement (PPS);
- A regulatory authority under Section 28 of the CA Act;
- A service provider to municipal partners and other public agencies;
- A Source Protection Authority under the *Clean Water Act*;
- A resource management agency; and
- A major landowner in the Greater Toronto Area.

In these roles, and as stated in MECP’s “A Made-In-Ontario Environment Plan,” CAs work in collaboration with municipalities and stakeholders to protect people and property from flooding and other natural hazards, to conserve natural resources. We recognize that watershed and subwatershed planning are the responsibilities of the planning authority (typically municipalities) as required under the PPS and provincial plans. In TRCA’s experience, our municipal partners rely on us to lead or co-lead the coordination and development of watershed plans and engage in the planning process where subwatershed plans are required. Further, TRCA collaborates with all stakeholders, such as municipalities and landowners, in the implementation of watershed and subwatershed plans.

Government Proposal

We understand that the proposed Guide is intended to provide advice for implementing land use planning policies related to watershed and subwatershed planning in coordination with planning for

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water, wastewater and stormwater servicing, water resources, drinking water source protection and climate change resilience. The ERO proposal points out that there are requirements for watershed and subwatershed planning in the PPS and the following provincial plans:

- A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan, 2020)
- Greenbelt Plan (2017)
- Oak Ridges Moraine Conservation Plan (2017)
- Niagara Escarpment Plan (2017)
- Lake Simcoe Protection Plan (2009)

The last provincial guidance for subwatershed planning was published in 1993 and the proposed Guide aims to provide a modern framework and a more consistent, coordinated, and efficient approach for subwatershed planning across Ontario.

General Comments

TRCA staff support the proposed guidance in principle, given the importance of integrated watershed management and desire for a consistent approach to the subwatershed planning process across the province. We offer the following general comments, with key elements emphasized in **bolded text** followed by more detailed comments organized by sections in the Guide.

Watershed vs. Subwatershed Planning

TRCA is concerned that the Guide uses watershed planning and subwatershed planning as though they are interchangeable terms. For example, on page 12 under Context, it states, “Watershed/subwatershed planning for land use planning purposes is a responsibility....” Moreover, the Guide states that it is intended, “to provide advice for implementing land use planning policies related to watershed and subwatershed planning in coordination with planning for water, wastewater and stormwater servicing, water resources, drinking water source protection and climate change resilience.” This is an ambitious purpose to achieve all of this in one guide for both watershed planning and subwatershed planning.

While the process for watershed and subwatershed planning may be similar, the scope, scale, and stakeholder roles for each type of plan differ substantially. Referring to them interchangeably undermines the admirable intent of the Guide for clarity, efficiency, and consistency. **TRCA recommends citing early in the Guide, watershed planning and subwatershed planning definitions from provincial plans and the PPS, followed by a description of key distinctions between the two terms. Given that the Guide is directing subwatershed planning, it should be clear as to that purpose and for further clarity, indicate if there is an intent to produce a separate Watershed Planning Guide.**

The existing trio of guidance documents from 1993 include one on Watershed Planning, one on Subwatershed Planning, and the third on Implementation through Municipal Planning documents. Perhaps if a similar approach is taken with the currently proposed guidance (and subsequent guides), it would address the confusion between the overlapping references to watershed and subwatershed planning in the Guide. The ministry should consider leveraging the multi-sectoral expertise present in the Conservations Authorities Working Group and additional time limited consultation and engagement to provide advice on the 2018 version of the Watershed Planning guidance towards this end.

Integrated Watershed Management

As described in the PPS and the Growth Plan, the watershed is the ecologically meaningful scale for integrated, long-term planning for healthy watersheds and healthy communities. This is indicative of the

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dependency between the Water Resource System (WRS) and Natural Heritage System (NHS) and their importance to watershed planning. In contrast, the Guide describes the natural hazard management component of watershed/subwatershed planning in isolation, which does not represent the systems approach or integrated watershed management planning. The absence of this fundamental integration may compromise the ability of subwatershed plans to comprehensively assess conditions and impacts, and to set and establish meaningful targets and management/mitigation recommendations. TRCA recommends that stronger language emphasizing an integrated and systems-based approach necessary for subwatershed and watershed planning is incorporated throughout the Guide. Accordingly, the interdisciplinary expertise of CAs should be emphasized in the Guide as technical experts in not just natural hazard management but as integrated watershed managers, especially if the systems approach is appropriately acknowledged as foundational to effective watershed and subwatershed planning.

Although the Guide references adapting to a changing climate, it does not specify the need to assess the changing climate and incorporate this information into the scenario analysis or decision making. TRCA recommends that additional direction be provided on how climate change considerations can be meaningfully incorporated in the subwatershed planning processes.

Green infrastructure within the built portions of watersheds (such as urban trees, bioswales, green roofs) play an important role in managing urban water and several other valuable ecosystem services. As watersheds become increasingly built-out, watershed and subwatershed planning must evolve to assess impacts and provide watershed management recommendations for intense urban growth and intensification (e.g., redevelopment, retrofit, restoration) to achieve healthy and resilient watersheds for residents. TRCA recommends that the Guide highlight the importance of various forms of green infrastructure to mitigating impacts and direct its inclusion in characterization, impact assessment, and recommendation phases of subwatershed planning, especially in urban and urbanizing watersheds.

Funding and Implementation

A critical early component in the subwatershed planning process to ensure that it proceeds smoothly and expeditiously is determining the funding sources and mechanisms that align with the scope, nature, timing, and extent of work involved. The 1993 Subwatershed Planning document had a section on funding, acknowledging that there is not a generic funding formula in place and that various and innovative approaches to securing funding may be required. In TRCA's experience, there have been different approaches applied to subwatershed planning including a combination of municipal funding, developer/landowner contributions and area specific municipal development charges. It is recommended that a section on funding be added to the draft Guide. This section should also emphasize the cost saving benefits of subwatershed planning in providing certainty and streamlining of future development and infrastructure planning approval processes.

Once watershed and subwatershed plans are developed, adequate resources need to be allocated for its successful implementation and monitoring. This includes implementation through land use planning processes, as well as other initiatives such as awareness building, and stewardship initiatives for ecological restoration and monitoring and maintenance/remediation. All of these are possible only through adequate and sustained

funding, innovative collaborations, and partnerships to meet shared priorities for projects and land securement.

Section 3.4 on page 31 of the Guide briefly describes approval and implementation. In TRCA’s work to support Municipal Comprehensive Reviews through watershed planning exercises (in accordance with existing plan review MOUs), our municipal partners expressed a strong desire for implementation guidance in the form of specific management recommendations. In this regard, section 3.4 could benefit from elaboration on land use planning management recommendations for both development and infrastructure planning. Earlier in the Guide on page 16, one of the purposes of a subwatershed plan is, “identify official plan land use designations.” We suggest it may be helpful to municipalities for the Guide to delve further into how technical information from a subwatershed plan translates to municipal growth management and servicing policies and ultimately, on-the-ground planning. TRCA recommends that the Guide include specific direction on funding and implementation and, if possible, indicate if there will be provincial support to implement the recommendations of subwatershed plans and provide examples of infrastructure and land use planning management recommendations.

TRCA Detailed Comments by Section in the Guide

1. Background and Context	
Purpose of Guide	<ul style="list-style-type: none"> • The first sentence and preceding section both include watershed and subwatershed planning, so does the next section, but the Guide later refers only to subwatershed. The confounding of terms contradicts provincial policies in the PPS and Growth Plan. The PPS recognizes the watershed as the ecologically meaningful scale for integrated and long-term planning and speaks to all the components of watershed planning. The Growth Plan specifically differentiates between Watershed Planning and Subwatershed Planning as a matter of scale and the level of direction to municipal planning. Watershed planning is to inform the identification of water resource systems (WRS), the protection, enhancement, or restoration of the quality and quantity of water, decisions on allocation of growth, and planning for water, wastewater, and stormwater infrastructure. Subwatershed plans are to inform planning for large-scale development in designated greenfield areas and can be useful for addressing major intensification and infrastructure proposals in a greyfield context such as an Urban Growth Center. We recommend clarifying the scope and intent of the Guide. • The Guide does not “provide advice for implementing land use planning policies related to watershed and subwatershed planning in coordination with planning for water, wastewater and storm water servicing, water resources, drinking water source protection and climate change resilience” (p.5). There are no specific links to planning for water, wastewater, stormwater, and climate change. We recommend that this link is made clearer in the document.

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	<ul style="list-style-type: none"> The first paragraph (p.5) should list natural hazards and natural heritage (or aquatic and terrestrial ecology) in the list of policies to be consistent with the rest of the Guide as well as with PPS and the Growth Plan.
<p>Benefits of Watershed and Subwatershed Planning</p>	<ul style="list-style-type: none"> This section does not align with the principles of Integrated Watershed Planning and Management and systems approach that are emphasized in the PPS and the Growth Plan. This unfortunate omission of other important systems, e.g., natural systems, also undermines the effectiveness of various hazard management practices. Among others, these practices include protection and restoration of natural heritage systems and implementation of various green infrastructure to improve hazard conditions, particularly more frequent flooding/erosion. Additionally, this section does not recognize the importance of climate impacts and benefits of watershed and subwatershed planning to build climate resilience for natural and built systems in the watersheds. As such, the list of benefits does not align with the points provided in Section 2.1. on subwatershed studies that includes the first bullet: “Protecting and enhancing the environment, including important natural heritage systems and water resource systems.” (p.16) The draft provincial watershed planning guidance from 2018 recognized and spoke to both watershed and subwatershed planning as being similar processes with a difference of scale. This draft guidance also provided more direction to municipalities on how to connect outputs from watershed planning components to municipal land use and infrastructure planning. This Guide does not provide that provincial direction on how to connect the processes to align with provincial policies. Integrated and long-term planning would recognize the systems-based approach embedded in the PPS and Growth Plan that recognizes the linkages and related functions of both the WRS and NHS and their importance to watershed planning. Focusing solely on natural hazards does not represent integrated planning and fails to recognize the interrelated nature of watershed components (i.e., flooding, erosion, natural heritage planning, water quality, water resource system features and areas, ecological and hydrological functions). Climate change adaptation and resiliency should be included in the list of benefits.
<p>Context</p>	<ul style="list-style-type: none"> If the Province published a trio of guidance documents in 1993 including one on Watershed Planning, one on Subwatershed Planning, and the other on Implementation through Municipal Planning documents, then perhaps that is the similar approach that should be taken in this Guide (or subsequent guides) to address the confusion between the watershed and subwatershed planning references in this Guide. Each of these subsequent guides could focus on the targeted component only. Perhaps the Province could consider leveraging the expertise of the Conservation Authorities

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	<p>Working Group to build on the previously released but not finalized 2018 Watershed Planning Guidance document towards this end.</p> <ul style="list-style-type: none"> • For instance, a guide on watershed planning would be helpful to explain how watershed planning is intended to inform water, wastewater, and stormwater management planning. • As is, this Guide can be the update to the second bullet (subwatershed planning, p.6) with clarification that other components' guidance will be separately provided. We strongly encourage the Province consider taking this approach to these documents.
<p>Watershed vs. Subwatershed Plans</p>	<ul style="list-style-type: none"> • Figure 1 is unclear. We suggest using a clearer figure and/or real-world example from the Growth Plan area (e.g., Humber River watershed - Black Creek subwatershed). TRCA would be pleased to provide other illustrative examples to the Province if it is helpful. • The purpose of watershed planning (bullets) needs to recognize the importance of management over the long term, otherwise climate and growth management aspects are not covered. There is a need to recognize changing land use and climate conditions and therefore the text should focus on protection and management for long term sustainability and resilience. • Further to the above comments related to the purpose and context of the Guide, this section should be updated accordingly for clarity regarding watershed and subwatershed planning. • It is recommended that intensification, redevelopment, and community revitalization be included in the list of issues which may trigger the need for a subwatershed plan.
<p>Relationship of Watershed Planning to Land Use and Infrastructure Planning</p>	<ul style="list-style-type: none"> • The first sentence should also include reference to informing NHS planning and green infrastructure planning. • Figure 2 is missing the components of watershed planning and subwatershed planning as defined in provincial policies to be undertaken by municipalities. Definition of watershed planning from the Growth Plan: <i>"Planning that provides a framework for establishing goals, objectives, and direction for the protection of water resources, the management of human activities, land, water, aquatic life, and resources within a watershed and for the assessment of cumulative, cross-jurisdictional, and cross-watershed impacts."</i> It is much broader than CA programs and services, and the policies state municipalities are to undertake watershed planning in partnership with CAs as appropriate. This figure needs to reflect that. • The CA Programs and Services listed in Figure 2, are just the mandatory services, but this figure should recognize that CAs are already doing non-mandatory work, and can do much more work (beyond hazard related components) and that many of those programs will feed into watershed plans or implement watershed plans (e.g., municipal or service level agreements). Watershed planning is defined much more broadly above,

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	<p>which is not reflected in the figure. Also, if this figure reflects the municipal needs as they undertake these plans it would be more beneficial and informative.</p> <ul style="list-style-type: none"> • Figure 2 needs to recognize that CAs also provide detailed NHS and WRS mapping, which helps complement provincial and regional natural heritage systems and provides additional potential targeted areas for restoration and enhancement . • Alternatively, Figure 2 could be simplified and kept to a much higher level with components that need to be considered aligned with the policy framework.
Policy Context Equivalent Studies	<ul style="list-style-type: none"> • In reference to the provincial NHS mapping, the Guide should recognize that the provincial NHS is often too coarse for urbanized areas such as the Greater Toronto Area with highly fragmented natural cover. To address this gap many municipalities in partnership with CAs have identified a finer level NHS to complement the provincial NHS. We recommend that this Guide recognize and provide support to implement these initiatives. Furthermore, the requirement for municipal NHS planning is set out in the PPS and Growth Plan and this guide could reference this linkage and the essential intersection of this work in the development of robust subwatershed plans. • It is recommended that “equivalent studies” is meant to be at the subwatershed level for purposed of the Guide.
Roles and Responsibilities	<ul style="list-style-type: none"> • Further to our general comments, watershed planning and subwatershed planning are not synonymous terms. • The emphasis on CAs’ involvement in subwatershed planning linked to services around the reduction of natural hazard risk does not fully reflect the Province’s integrated, systems-based NHS and WRS policy framework. Without a systems-based approach that recognizes the interlinks between the WRS and NHS and the evidence provided by watershed data and watershed science, addressing natural hazards effectively over the long term will be extremely challenging, if not impossible, especially in the face of changing land use and climate. • The section on CAs needs to be more concise and accurately reflect the role of CAs (i.e., focus on CA roles, technical expertise and partnerships and reduce the level of detail regarding the regulations).
2. Purpose and Principles of Subwatershed Planning	
Purpose of Subwatershed Plans	<ul style="list-style-type: none"> • Pg. 16 <i>“Identify natural features, areas, and related hydrologic functions.”</i> is repeated twice. • Within the specific list of what subwatershed plans should do – an additional point should be that they provide information on how the climate is changing and how it will potentially impact the NHS and WRS as an important component for healthy and resilient watersheds.

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<p>Principles for Subwatershed Planning</p>	<ul style="list-style-type: none"> • There should be a principle on adapting to a changing climate, as well as potentially incorporating green infrastructure. • Principles 6 and 7 highlight the importance of watershed planning and subwatershed planning, thus referencing the need for guidance on both. • Principle 9 should include “objectives” - “The role and responsibilities of partners, objectives, milestones, and timelines...” • It is recommended that an additional principle be added to encourage planning authorities to undertake a robust public engagement process to raise public awareness and support for implementation.
<p>3. Subwatershed Planning Process</p>	
<p>Setting the Stage (Step 1)</p>	<ul style="list-style-type: none"> • The first bullet, 3.1, should include “Identifying partners with a legislative responsibility related to or an interest in participating in the subwatershed planning process such as conservation authorities...” • We are pleased to see the requirement for early and active engagement of stakeholders in the initial phases of the process, as well as determining funding mechanisms and responsibilities, with transparency and accountability provided through development of a Charter, Terms of Reference and Steering Committee that follows in Step 2.
<p>Recognizing and Aligning the Interests (Step 2)</p>	<ul style="list-style-type: none"> • Recognizing the tremendous co-benefits associated with watershed health, and the importance of adding an equity lens to watershed and climate issues, this Guide should require that a broad set of intersectoral stakeholders participate in the plan development, including non-traditional partners from the socio-economic and community health fields (i.e., United Way, Public Health, Housing, etc.)
<p>Preparing and Approving the Subwatershed Plan (Step 3)</p> <ul style="list-style-type: none"> – Phase 1: Identification of Existing Conditions and Initial Assessment – Phase 2: Completion of Impact Assessment and Development of the Land Use Scenario – Phase 3: Implementation and 	<ul style="list-style-type: none"> • Based on TRCA’s experience, this process could be simplified as this is the only step that is broken into phases with each phase being a substantial amount of work: <ul style="list-style-type: none"> ○ Stage 1 of the process should be Setting the Stage where the steps include: identifying partners, scoping the study and boundaries, engagement planning and project charter. ○ Stage 2 is watershed characterization (existing conditions) of natural hazards, water quality, terrestrial and aquatic conditions, etc. ○ Stage 3 is Impact Assessment and Land Use Scenarios (i.e., Future Conditions) where the components from characterization are assessed ○ Stage 4 is Developing the Plan, Implementation Planning, and Monitoring/Evaluation Plan. ○ This staged process recognizes the sequence of events more clearly and reflects the level of effort involved for each stage. • It is uncertain how impact assessment and development of preferred land use scenario can be determined before assessing current conditions. These sentences (bottom of p.22, “<i>Work can be undertaken on a subsequent</i>”

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<p>Management Strategies</p> <p>– Subwatershed Plan Timelines</p>	<p><i>phase...”) are unclear as the work needs to be sequential and methodological in order to provide the desired certainty for industry and municipal investments and successive infrastructure and development planning processes. Potential future conditions cannot be assessed without first understanding existing conditions. Moreover, a management strategy can't be developed without knowing what the potential impacts will be from various scenarios.</i></p> <ul style="list-style-type: none">● Phase 1<ul style="list-style-type: none">○ Include the identification of priority geographical areas, with overlapping priorities or watershed issues. Look to previous Watershed Plan Implementation Plans for examples.○ Climate conditions should also be identified in the existing conditions phase.○ In Data Requirements and Collection, we suggest grouping the components listed into larger headings. For example:<ul style="list-style-type: none">▪ Water Resource System▪ Natural Heritage System▪ Water Quality▪ Natural Hazards▪ Infrastructure○ This list should also be tabular with recommended benchmarks or indicators for each component (e.g., amount of natural cover in hectares, water quality parameters of concern based on PWQO, # of flood vulnerable roads/structures, aquatic community rankings (FBI, IBI).● Phase 2<ul style="list-style-type: none">○ In 3.3.2: In the list of inputs used to identify targets, for consistency with provincial policies, please revise to indicate that development is to be directed away from hazardous lands (and further s. 3.1.5 of the PPS prohibits certain development). Also, key hydrologic features are to be protected as well as natural heritage features and their areas of influence or areas of interference with specific requirements for how development could occur there. This list is broader than just sensitive habitats and wetlands and should be recognized for clarity purposes.○ In 3.3.2: Regarding alternatives, the 2018 watershed guidance gave practical examples and case studies. In an Appendix, the Guide could provide direction on how the alternatives should be designed using examples.○ In 3.3.3: Regarding environmental assessments and/or master planning processes alignment with subwatershed plans, the 2018 guidance attempted to provide direction on this and the record of comments from that time should be part of this process. There were sections and tables providing practical examples of outputs from (sub)watershed planning and how they can inform different aspects of municipal land use and infrastructure planning based on provincial policies. Examples:
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	<ul style="list-style-type: none"> ▪ the identification of WRS, NHS and appropriate buffers to inform any development planning ▪ Priority areas for stormwater retrofits or LID implementation based on water quality, flood, and erosion risk. ▪ Priority areas for ecological restoration and enhancement to mitigate impacts of land use and required infrastructure. <ul style="list-style-type: none"> • Phase 3 <ul style="list-style-type: none"> ○ In 3.3.3, we recommend grouping the list on p. 29, as mentioned in previous comment, by overall themes and including recommendations on benchmarks or indicators per component. <ul style="list-style-type: none"> ▪ The list is missing WRS (but does mention NHS) ○ Significant emphasis needs to be put on this phase, including strategies to actively implement the recommendations by the municipality, CA and through partnerships with owners/industry, utilities, agencies, etc. ○ Include the identification of geographic target areas for strategic implementation, where multiple issues may be present that require a comprehensive approach to retrofit or improvement at the catchment/neighbourhood scale. The TRCA Sustainable Neighbourhood Action Program is a nationally recognized award-winning program at the catchment level or neighbourhood scale that can be referenced for examples to inform this point. ○ Include the engagement of stakeholders (upper and lower tier municipal and CA departments, industry, agencies, utilities) in identifying targeted areas of shared interest and aligning projects for priority implementation. This may support achievement of subwatershed objectives through projects led by others. • Subwatershed Plan Timelines <ul style="list-style-type: none"> ○ In 3.3.4, the timeline acknowledges that most of the work occurs during the three phases of step 3 but doesn't account for the other steps in the process. See previous comments on simplifying the process. <ul style="list-style-type: none"> ▪ Suggest a Gantt chart to illustrate the progression of the stages.
<p>Approval and Implementation of Plan (Step 4)</p>	<ul style="list-style-type: none"> • Include the identification of community co-benefits as part of the subwatershed plan implementation (e.g., cost savings of green infrastructure, human health and well-being benefits, skills training, and education, in addition to benefits for the infrastructure and development approvals process including creating certainty for infrastructure and investment, streamlining of successive planning approvals, etc.) • Include the sharing/communication of plan objectives, recommendations and priority projects with stakeholders and community in support of shared implementation

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<p>Monitoring and Evaluation (Step 5)</p> <ul style="list-style-type: none"> – Monitoring – Evaluation 	<ul style="list-style-type: none"> • This section emphasizes the need for monitoring and evaluation over the long term for successful implementation of the subwatershed plans. This will provide guidance that is beneficial for the subwatershed planning process. Given that long term monitoring needs of the subwatershed, studies need to be nested within the broader regional monitoring programs, often embedded within the watershed plans; it would be helpful if the Guide included clearer directions on CA roles and responsibilities and demonstrated examples of such programs, e.g., long-term regional monitoring services that CAs provide to municipal partners emphasizing their benefit to subwatershed and watershed planning. We recommend that the Guide add this information for clarity and to ensure that an effective monitoring and evaluation process is put in place. We would be pleased to provide such examples of such services from our work with municipal partners including, York, Peel, Durham, and Toronto in our jurisdiction.
<p>4. Public Engagement</p>	<ul style="list-style-type: none"> • Very little detail is included regarding the importance of broader public engagement in the (sub)watershed planning process (outside of the steering committee). There is no mention of the development of an engagement plan which is needed to establish engagement methods, timelines, record keeping, how results will be communicated, etc. We recommend that this guidance on engagement be added to the Guide. In our jurisdiction we have attempted to coordinate this engagement with Municipal Comprehensive Review or other appropriate land use planning processes involving our municipal partners to ensure stakeholders and the public are engaged in the most efficient way possible.
<p>5. Indigenous Partnerships and Engagement</p>	<ul style="list-style-type: none"> • This section emphasizes the need for Indigenous partnerships and engagement, which we highly commend.
<p>Appendix A – Key Technical Tools and Considerations</p>	<ul style="list-style-type: none"> • It is unclear how a definition of components is a technical tool and consideration. A matrix outlining indicators, research questions, and reference materials for each component would be more useful. For example, guidance on how to delineate the WRS including methodologies for identifying each KHF and KHA should be included. <u>Note</u>: water quality is the only one that provides some direction on how to do an assessment and on types of indicators to employ, but it could be better organized in a table. • Reference to the NHS is missing and the Province’s Natural Heritage Reference Manual has been a key tool for subwatershed processes we have been engaged in and should be referenced here. • There is a critical need to modernize the 2002 natural hazards provincial technical guidelines (flooding and erosion) to incorporate climate change and cumulative impact considerations, to account for technological advancements in modelling methodologies and mapping outputs, and to provide technical and policy guidance specific to flood risk and mitigation in the urban context.

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TRCA appreciates the Ministry's collaborative efforts in producing this Guide as a member of the multi-stakeholder Conservation Authorities Working Group that provided input for the Guide.

Thank you once again for the opportunity to provide comments on this ERO proposal. Should you have any questions, require clarification on any of the above, or wish to meet to discuss our remarks, please contact the undersigned at 416.661.6600, Ext. 5281 or at laurie.nelson@trca.ca.

Sincerely,

< Original signed by >

Laurie Nelson, MCIP, RPP
Director, Policy Planning

BY E-MAIL

cc:

TRCA: John MacKenzie, Chief Executive Officer
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