

Section III – Items for the Information of the Regional Watershed Alliance

TO: Chair and Members of the Regional Watershed Alliance
Meeting #4/20, Wednesday, November 18, 2020

FROM: Laurie Nelson, Director, Policy Planning

RE: **SUMMARY OF 2020 TRCA POLICY CONSULTATION SUBMISSIONS ON RECENT PROVINCIAL POLICY INITIATIVES**

KEY ISSUE

Summary of Toronto and Region Conservation Authority (TRCA) policy consultation submissions on provincial legislative, regulatory and policy initiatives relevant to TRCA interests from April to September 2020, for the information of the Regional Watershed Alliance.

RECOMMENDATION

WHEREAS to date in 2020, the Province of Ontario has posted several legislative, regulatory and policy initiatives on the Environmental Registry of Ontario (ERO) relevant to Toronto and Region Conservation Authority's (TRCA) interests;

WHEREAS TRCA staff have submitted several letter responses to the provincial government and are in the process of responding to other government proposals not yet due;

THEREFORE, LET IT BE RESOLVED THAT TRCA staff report on a summary of completed TRCA policy submissions and TRCA work-in-progress submissions from April to September 2020, be received;

BACKGROUND

Since January 1, 2020, the Province of Ontario released for consultation a number of legislative, policy, and regulatory proposals of interest to TRCA, the majority of which were posted on the Environmental Registry of Ontario (ERO). The Planning Policy and Regulation business unit within the TRCA Policy Planning division is primarily responsible for leading internal reviews of government proposals on a range of matters relevant to TRCA interests. Staff provided a [Summary of 2020 TRCA Policy Consultation Submissions and Recent Provincial Policy Initiatives](#), and letter submissions to the ERO for the period of January to April 2020, to the Board of Directors at Meeting#3/20, held on April 24, 2020.

Provincial initiatives and consultations have continued at a fast pace throughout the spring and summer months, despite the COVID-19 pandemic. TRCA staff have maintained business continuity in providing submissions that integrate the expertise and multi-disciplinary perspectives of TRCA's teams; informed by the successes and challenges staff experience in their day-to-day work with municipalities, proponents and other stakeholders; with emphasis on shared provincial, municipal and TRCA objectives and priorities. Examples of ERO postings have included proposed Amendments to A Place To Grow: Growth Plan for the Greater Golden Horseshoe and associated Land Needs Assessment Methodology, modernizing the Environmental Assessment process, and the Greater Toronto Area West Transportation Corridor Environmental Assessment (EA) process. All TRCA provincial policy submissions are vetted through senior staff, approved and signed by the Chief Executive Officer, or designate, prior to submission to ensure alignment with corporate strategic priorities and objectives.

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RATIONALE

The outcomes of provincial government initiatives can have implications on TRCA's day-to-day work in multiple roles as a resource management agency, a regulator, a public commenting body with delegated authority to represent the provincial interest for natural hazards, and landowner, in a region experiencing significant growth and associated land use and environmental challenges. Therefore, it is important for TRCA to provide input on government proposals in order to encourage provincial initiatives to align with and support TRCA objectives and interests.

Staff at the Ministry of Environment, Conservation and Parks, Ministry of Natural Resources and Forestry (MNR), Ministry of Municipal Affairs and Housing and other provincial agencies sometimes reach out to TRCA for information and advice, in recognition of TRCA's expertise in watershed science and depth of on-the-ground experience in development and infrastructure planning and detailed design. For example, Patricia Koval, member of Ontario's Advisory Panel on Climate Change, (and Chair of Toronto and Region Conservation Foundation's Board of Directors), requested a letter of TRCA staff's recommendations on how MNR's Protecting People and Property: Ontario's Flooding Strategy released on March 9, 2020 could be strengthened or improved upon with more detail. The recommendations in this letter, (Attachment 13 and further described below), draw upon TRCA's previous correspondence to the Special Advisor on Flooding following our meeting and tour with the Advisor in September 2019.

Summary of Responses – April to September

Due to the volume and limited timeline of consultations established through the ERO process, (generally 30 to 45 days), only TRCA submissions on major initiatives are individually reported to the Board of Directors or Executive Committee, e.g., GTA West Transportation Corridor, amendments or regulations under the *Conservation Authorities Act* (not yet released by the Province).

For the Board's information, in Table 1 below is a list of provincial policy consultations for which TRCA completed and submitted responses from April 20th to September 2020, with links to the ERO proposals. Recognizing that Board Members may have an interest in TRCA's submissions that are not brought to the Board, TRCA letter responses to the ERO postings are contained as the attachments to this report.

Table 1, TRCA Policy Consultation Submissions to the ERO April – September 2020

| ERO Posting | Proposal Summary | Submission Date |
|--|---|---|
| 1. Proposed regulatory matters pertaining to community benefits authority under the Planning Act, the Development Charges Act, and the Building Code Act (ERO #19-1406) Link: https://ero.ontario.ca/notice/019-1406 | The Ministry of Municipal Affairs and Housing (MMAH) proposes Regulatory Matters Pertaining to Community Benefits Authority Under the <i>Planning Act</i> , the <i>Development Charges Act</i> , and the <i>Building Code Act</i> | April 20, 2020 Refer to Attachment 1 |

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| ERO Posting | Proposal Summary | Submission Date |
|--|---|---|
| 2. Early Access to Land for Environmental Studies on Transmission Projects (ERO #019-1371) Link: https://ero.ontario.ca/notice/019-1371 | The Ministry of Energy, Northern Development and Mines (ENDM) is proposing to give the Ontario Energy Board the authority to grant, under specific circumstances, earlier access to land to electricity transmission project proponents for the purpose of conducting preliminary environmental studies prior to applying for Leave to Construct. | April 30, 2020 Refer to Attachment 2 |
| 3. Proposed amendments to Ontario Regulation 244/97 and the Aggregate Resources of Ontario Provincial Standards under the Aggregate Resources Act (ERO #019-1303) Link: https://ero.ontario.ca/notice/019-1303 | The Ministry of Natural Resources and Forestry (MNRF) is proposing changes to O. Reg. 244/97 and the Aggregate Resources of Ontario Provincial Standards under the <i>Aggregate Resources Act</i> . | May 15, 2020 Refer to Attachment 3 |
| 4. New Statement of Environmental Values for Ministry of Infrastructure (ERO #019-1536) Link: https://ero.ontario.ca/notice/019-1536 | The Ministry of Infrastructure (MOI) is proposing a new Statement of Environmental Values (SEV) in order to reflect the changes in its structure and mandate, as well as to acknowledge the priority of addressing climate change. | May 25, 2020 Refer to Attachment 4 |
| 5. Proposal to identify and protect a corridor of land for future electricity infrastructure in the Greater Toronto Area (ERO #019-1503) Link: https://ero.ontario.ca/notice/019-1503 | The Ministry of Energy, Northern Development and Mines (ENDM) is proposing to identify and preserve a corridor of land in the Northwest Greater Toronto Area (GTA) for future electricity transmission infrastructure so we can support growth in Halton, Peel and York regions. ENDM is seeking feedback on a proposed narrowed study area, as well as input on the guiding principles we will consider in conducting the study. | June 8, 2020 Refer to Attachment 5 |
| 6. Metrolinx: Permit for activities that will result in a significant social or economic benefit to Ontario (ERO #019-1682) Link: https://ero.ontario.ca/notice/019-1682 | The Ministry of the Environment, Conservation and Parks (MECP) is seeking public input on a proposal for three permits under the <i>Endangered Species Act</i> (ESA) in relation to three priority transit projects that will improve public transit in the Greater Toronto Area. The proposed permits have the potential to impact species at risk and consider options to avoid and minimize impacts on the species. | June 24, 2020 Refer to Attachment 6 |
| 7. Developing government response statements for nine | The Ministry of the Environment, Conservation and Parks (MECP) is | June 28, 2020 |

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| ERO Posting | Proposal Summary | Submission Date |
|--|--|--|
| <p>species at risk under the Endangered Species Act, 2007 (ERO #019-1749) Link: https://ero.ontario.ca/notice/019-1749</p> | <p>proposing government response statements that outline actions the government is taking and supports to protect and recover nine species at risk in Ontario: Blanding's Turtle, Eastern Whip-poor-will, Little Brown Myotis, Northern Bobwhite, Northern Myotis, Spiny Softshell, Spotted Turtle, Tri-colored Bat and White Wood Aster.</p> | <p>Refer to Attachment 7</p> |
| <p>8. Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO #019-1680) Link: https://ero.ontario.ca/notice/019-1680 With related posting: Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO #019-1679) Link: https://ero.ontario.ca/notice/019-1679</p> | <p>The Ministry of Municipal Affairs and Housing (MMAH) is consulting on a proposed amendment to A Place to Grow: Growth Plan for the Greater Golden Horseshoe. This update includes changes to the population and employment forecasts, the horizon year for planning, and other policies to increase housing supply, create jobs, attract business investment and better align with infrastructure. The Ministry of Municipal Affairs and Housing (MMAH) is consulting on a new Land Needs Assessment Methodology for the Greater Golden Horseshoe which supports the implementation of A Place to Grow: Growth Plan for the Greater Golden Horseshoe. This posting presents the outcome-based Methodology that, if approved, would replace the existing Methodology.</p> | <p>July 31, 2020 Refer to Attachment 8</p> |
| <p>9. Updating Ontario's Water Quantity Management Framework (ERO #019-1340) Link: https://ero.ontario.ca/notice/019-1340</p> | <p>The Ministry of the Environment, Conservation and Parks (MECP) is proposing regulatory changes for managing water takings to protect the long-term sustainability of surface water and groundwater and to ensure these important resources are responsibly managed and safeguarded now and for future generations.</p> | <p>July 31, 2020 Refer to Attachment 9</p> |
| <p>10. Environmental assessment modernization: amendment proposals for Class Environmental Assessments (ERO #019-1712) Link: https://ero.ontario.ca/notice/019-1712</p> | <p>The Ministry of the Environment, Conservation and Parks (MECP) is modernizing the environmental assessment program by working with proponents of Class Environmental Assessments (Class EA) to propose changes that would ensure strong environmental oversight, while aligning assessment requirements with environmental impact, reducing duplication and increasing efficiency of the Class EA process.</p> | <p>August 21, 2020 Refer to Attachment 10</p> |

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| ERO Posting | Proposal Summary | Submission Date |
|--|---|---|
| 11. Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project (ERO #019-1882) Link: https://ero.ontario.ca/notice/019-1882 | The Ministry of the Environment, Conservation and Parks (MECP) is proposing a regulation to update the existing environmental assessment process for the Ministry of Transportation's Greater Toronto Area (GTA) West Transportation Corridor. The regulation would create a new streamlined process for assessing potential environmental impacts of the project, as well as consulting on it. | August 21, 2020 Separate Report to the Board, September 25, 2020 |
| 12. Proposal to exempt various Ministry of Transportation projects from the requirements of the Environmental Assessment Act (ERO #019-1883) Link: https://ero.ontario.ca/notice/019-1883 | The Ministry of the Environment, Conservation and Parks (MECP) is proposing a regulation to exempt select Ministry of Transportation projects from the requirements of the <i>Environmental Assessment Act</i> , subject to conditions for environmental protection: the Bradford Bypass and several Ministry of Transportation Provincial Transportation Facilities class environmental assessments (Class EA) projects. | August 22, 2020 Refer to Attachment 11 |
| 13. Proposed changes to environmental approvals for municipal sewage collection works (ERO #019-1080) Link: https://ero.ontario.ca/notice/019-1080 | The Ministry of the Environment, Conservation and Parks (MECP) is proposing to modernize Ontario's environmental approval process for low-risk municipal sewage works by implementing a Consolidated Linear Infrastructure Permissions Approach. The proposed approach will consolidate and update the approvals process for these types of works and incorporates measures that will enhance environmental protection. | September 4, 2020 Refer to Attachment 12 |
| 14. Proposed amendments to the Director's Technical Rules made under section 107 of the Clean Water Act, 2006 (ERO #019-2219) Link: https://ero.ontario.ca/notice/019-2219 | The Ministry of the Environment, Conservation and Parks (MECP) is proposing updates to the technical rules for assessing source water protection vulnerability and risk under the <i>Clean Water Act</i> to ensure that the quality of Ontario's drinking water continues to be protected and that source protection efforts are supported by current science. | November 9, 2020 Attachment not available (draft letter in progress) |

Also provided for the information of the Board, are the following summaries of select ERO and non-ERO provincial policy initiatives and submissions related to TRCA interests.

TRCA Recommendations to Ontario's Advisory Panel on Climate Change

TRCA staff met with Patricia Koval, member and Lynette Mader, Vice Chair of Ontario's Advisory Panel on Climate Change in March 2020 to share our knowledge and expertise in supporting the creation of sustainable and resilient communities, infrastructure, and development within TRCA's jurisdiction. Subsequently, Patricia Koval requested a letter from TRCA outlining our recommendations on MNRF's [Protecting People and Property: Ontario's Flooding Strategy](#) could be strengthened or improved upon with more details. While it is recognized that the Strategy is meant to be a high-level document, TRCA's review of the document highlighted several areas of improvement, including:

- Further details in a workplan, including timelines, to provide certainty on the delivery of priorities and actions;
- Establishing Working Groups – policy, planning and regulatory working group integrated with the technical group;
- Highlighting the value of watershed planning and conserving natural resources to managing flood resiliency;
- Funding to support implementation;
- Priority on updating provincial technical guidelines, to reflect current technology and approaches, particularly within the urban context, so as not to be a barrier for innovative solutions; and
- Priority and recommendations related to the *Conservation Authorities Act* and associated regulations.

TRCA's detailed comments and submission of May 27, 2020 can be found in Attachment 13; the recommendations draw upon TRCA's previous correspondence to the Special Advisor on Flooding in 2019. It should be noted that recently TRCA staff have been selected to be a member of the Flood Mapping Technical Team, which is one of the working groups identified in the Strategy.

Bill 197 – COVID-19 Economic Recovery Act

On July 21, 2020, the Ontario Government passed Bill 197 – *COVID-19 Economic Recovery Act*, which amended a number of Acts including the *Planning Act*, *Development Charges Act*, *Environmental Assessment Act*, *Drainage Act*, *Ministry of Municipal Affairs and Housing Act*, *Public Transportation and Highway Improvement Act*, and the *Transit-Oriented Communities Act*. Leading up to this Omnibus Bill, TRCA provided comments on proposed amendments to various Acts as noted in Table 1 and per the attached submissions.

Notable changes to the *Planning Act* coming out of Bill 197 included the following regarding Minister's Zoning Orders (MZOs):

- Currently, under section 47 of the *Planning Act*, the Minister may make orders exercising zoning powers. The Schedule amends section 47 of the Act to give the Minister enhanced order-making powers relating to specified land, including powers in relation to site plan control and inclusionary zoning. Among other things, this provides the Minister with the ability to require the inclusion of affordable housing units in the development or redevelopment of specified lands, buildings or structures. "Specified land" is defined as land other than land in the Greenbelt Area within the meaning of the *Greenbelt Act*, 2005.
- Also, among other things, a Minister's order may require that the owner of the specified land enter into an agreement with the relevant municipality respecting specified matters related to development on the land and conditions required for the approval of plans and drawings in a site plan control area. The amendments provide that the Minister may give direction to the parties concerning the agreement. An

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agreement is of no effect to the extent that it does not comply with the Minister's direction, whether the Minister's direction is given before or after the agreement has been entered into.

Minister's Zoning Orders (MZO) and Growth Plan Amendment 1 (2020)

TRCA submitted a response to ERO postings on the 2020 Proposed Amendment 1 to A Place To Grow: Growth Plan for the Greater Golden Horseshoe (the Plan) and the associated proposed Land Needs Assessment Methodology (LNA methodology); see summary below as well as Attachment 8). Through our comments, staff expressed concern that the proposed ability for a municipality to exceed the revised population and employment forecasts might encourage larger scale and more frequent requests for Settlement Area Boundary Expansions (SABEs) in advance of the completion of comprehensive studies (e.g., watershed and sub-watershed studies) that help determine natural heritage, infrastructure and water management constraints and opportunities. In our jurisdiction we noted and recommended a policy to stave off requests, e.g., the recent Dorsay request for Minister's Zoning Orders (MZO) outside of the Municipal Comprehensive Review (MCR) process. Further, we commented that with the proposed ability to exceed population targets, combined with previously approved Plan amendments of reduced density targets, the Growth Plan amendment appeared inconsistent with the intent of the Plan to avoid unmanaged growth, promote intensification and limit land and resource use. Both SABEs and MZOs can occur outside of the MCR process, causing potential disruptions in the orderly management of land. With the proposed amendments, the comprehensive studies that normally occur within an MCR would be circumvented by development and servicing schemes and proposals that may not take into consideration the larger context of the watersheds and systems affected by them. TRCA is currently working with several of its municipal partners to provide support on the integrated growth management they are undertaking through their MCRs.

ERO Postings 019-1679 and 019-1680 Growth Plan for the Greater Golden Horseshoe Amendment and Revised Land Needs Assessment Methodology

TRCA comments on Growth Plan Amendment 2020 and the revised Land Needs Assessment included an acknowledgement that stimulating growth in the GGH as part of the economic recovery from the COVID-19 crisis is critical. The comments emphasized, however, that this should not come at the expense of undermining the fundamental principles of the Growth Plan for "protecting what is valuable." TRCA recommended that strong direction is needed for municipalities to be able to determine that their growth forecasts and land needs can be accommodated while protecting water resources, natural heritage and managing impacts from natural hazards. TRCA comments reasoned that in order to implement provincial policies for "preparing for the impacts of a changing climate," the protection of these valuable natural resources within and outside the Protected Countryside of the Greenbelt must be maintained. One of the main recommendations on the proposed Land Needs Assessment was that the new methodology include specific reference to Growth Plan policies requiring environmental land "take outs" from land needs calculations. A full description of the Growth Plan Amendment and Revised Land Needs ERO proposals and TRCA's submission with recommendations are contained in Attachment 8.

Decision - Growth Plan Amendment and Revised Land Needs Assessment Methodology

Approximately four weeks after the ERO commenting period closed, on August 28, 2020, the Ministry of Municipal Affairs and Housing (MMAH) released the amended Growth Plan and final revised Land Needs Assessment Methodology, which came into effect immediately. The final documents largely aligned with what was proposed.

The Ministry received close to 7,000 submissions on the two ERO postings. They reported that there was support for updating the growth forecasts, extending the Plan horizon to 2051, and

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harmonizing the Plan with the PPS, 2020, but that municipalities had mixed reaction to using interim forecasts and forecasts as minimums. There were concerns with allowing employment land conversions in major transit station areas and with allowing new mineral aggregate operations, wayside pits and quarries within habitats of endangered and threatened species in the Natural Heritage System for the Growth Plan. There was only some support for the greater flexibility for planning around major transit station areas with respect to provincially significant employment zones.

Indigenous communities, agricultural and environmental sectors, and some in the municipal sector, were concerned that some of the policy changes would increase urban sprawl and result in the loss of agriculturally and environmentally significant lands. They also expressed significant concern that the policy amendment related to mineral aggregate resources would negatively impact species at risk and the biodiversity of the region. Indigenous communities also expressed strong opposition to the proposed mineral aggregates policy change as well as concerns with how some of the policy changes such as updated forecasts could impact Aboriginal and treaty rights.

As a result of the feedback received, the final amendment removed the proposed permission for mineral aggregate operations, wayside pits and quarries within Endangered Species habitat of the Growth Plan natural heritage system, however, the proposed policy for municipalities to develop higher forecasts through their municipal comprehensive review was retained.

With respect to the final revised Lands Needs Methodology released by the Province, TRCA's recommendation to explicitly exclude natural heritage system lands and lands subject to natural hazards from the developable area, in accordance with Growth Plan policy 2.2.7.3, was incorporated into the Community Area Land Needs calculation directions.

ERO Posting 019-1712 - Proposed Environmental Assessment Act (EAA) Amendments in the COVID 19- Economic Recovery Act

Related to the *Environmental Assessment Act* amendments through the *COVID-19 Economic Recovery Act* and the *More Homes, More Choice Act*, 2019, MECP posted a series of proposals to the ERO for modernizing Ontario's environmental assessment program. TRCA responded to those postings related to our roles as a reviewer of EAs as well as a proponent or co-proponent for flood and erosion control Class EAs and Municipal Class EAs.

MECP's stated intent for modernizing the environmental assessment program is to ensure strong environmental oversight, while aligning assessment requirements with environmental impact, reducing duplication and increasing efficiency of the Class EA process. The proposed amendments to Class EAs are meant to inform the development of streamlined regulations with clear expectations regarding consultation and defined timelines.

TRCA previously commented on the government's 2019 Discussion Paper on the EA process in our response to ERO 013-5101, on May 24, 2019. In that response, we indicated our support for streamlining the EA process and noted our expertise and experience to partner with stakeholders and to assist the government and contribute to realizing efficiencies, especially where multiple approval processes apply. We highlighted the need for maintaining within any proposed amendments or process changes the principle of ensuring a robust assessment of environmental, social and economic considerations and public consultation processes, appropriately scoped for project scale and location.

For the July 2020 proposed amendments to eight Class EAs, there were several of interest to TRCA: the Class EA for Minor Transmission Facilities (Hydro One), the Municipal Class Environmental Assessment (Municipal Engineers Association), the Remedial flood and erosion

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control projects (Conservation Ontario), and the Provincial Transportation Facilities (Ministry of Transportation). Some of the proposed changes included:

- changing requirements for some projects, including reducing requirements for certain projects, or exempting projects altogether;
- establishing or updating screening processes to determine the appropriate categorization for a project;
- updating the Class EAs to ensure consistency with the *Environmental Assessment Act* as a result of the passage of the *More Homes, More Choice Act*, 2019; and
- administrative changes to correct errors; update references to legislation and regulations; clarify the existing text; and update references to bodies, offices, persons, places, names, titles, locations, websites, and addresses.

TRCA comments, (Refer to Attachment 10) emphasized that undertakings now determined to be exempt from the Class EA process subject to new screening criteria within Class EA documents, and as permitted through the amendments to the EA Act, may still be subject to regulations under section 28 of the *Conservation Authorities Act*. For example, projects meeting the definition of development under the CA Act being undertaken within TRCA's jurisdiction, would still require permission under Ontario Regulation 166/06. To ensure that low-risk projects are not unduly delayed, TRCA has expedited review processes in place such as "Routine Infrastructure Works", "Emergency Infrastructure Works" and staff delegated permits or clearances. These are employed to consistently streamline review and approval through both the regulatory permitting process as well as the voluntary review process for Crown public infrastructure providers.

Therefore, we recommended that documents released under the Class EA initiative also emphasize the need to consider CA Act permits and requirements at the earliest possible stages of the planning and design process to ensure an integrated approach. In this way, permitting and technical information requirements to support all required approvals under all Acts would be scoped into supporting studies for projects as early as possible to help streamline project reviews.

As a member of the Conservation Ontario working group, TRCA is very pleased with the changes to the Class EA for Remedial flood and erosion control projects. The amendments to align this Class EA more closely with other approved Class EAs for similar types of work, and to clarify wording and expectations as it relates to the maintenance of existing flood and erosion control infrastructure, are very positive. These changes will allow critical maintenance projects that have historically had limited public interest to be streamlined.

The mandate of CAs strongly aligns with provincial objectives for resilient public infrastructure and, if highlighted in the amended Class EA documents, could better enable CAs to assist in meeting the intent of the EA Act to provide for the protection, conservation and wise management of Ontario's environment. Similarly, strengthening CA regulatory requirements to include Crown undertakings, would further assist in meeting the intent of the Act.

TRCA commented positively on the proposed amendments to the Municipal Class EA for Climate Change considerations, stating that our experience is that some proponents remain resistant to recognizing the impacts of climate change, including expected increases in more extreme weather events, and the subsequent impacts on infrastructure, particularly in flood or erosion prone areas. Detailed comments on many of the proposed amendments offered additions and revisions to highlight the valuable watershed-based programs and services of conservation authorities critical to safe and resilient public infrastructure planning.

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Relationship to Building the Living City, the TRCA 2013-2022 Strategic Plan

This report supports the following strategies set forth in the TRCA 2013-2022 Strategic Plan: This report supports the following strategies set forth in the TRCA 2013-2022 Strategic Plan:

Strategy 2 – Manage our regional water resources for current and future generations

Strategy 4 – Create complete communities that integrate nature and the built environment

Strategy 8 – Gather and share the best sustainability knowledge

Strategy 12 – Facilitate a region-wide approach to sustainability

FINANCIAL DETAILS

Staff are engaged in this policy analysis work per the normal course of duty, with funding support provided by TRCA's participating municipalities to account 120-12. No additional funding is proposed to support the policy analysis work associated with the preparation of these comments.

DETAILS OF WORK TO BE DONE

TRCA staff will continue to monitor the Environmental Registry of Ontario and the Province of Ontario News' Website to ensure TRCA is aware of, and where appropriate participates and comments on, legislative, regulatory, policy and guidance initiatives affecting TRCA interests. In particular, staff are waiting for the Province to launch consultation on the draft regulations under the amended *Conservation Authorities Act* and potentially further amendments to the Act.

Staff will keep the Board of Directors and Committees of the Board including the RWA informed of TRCA submissions at regular intervals and will monitor the outcomes of future decision notices, and report on the implications of legislative, regulatory and policy initiatives as appropriate. Staff will also update TRCA policies and procedures as required and facilitate training to reflect legislative and policy changes affecting TRCA.

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Attachments: 13

Attachment 1: TRCA Submission to ERO#019-1406

Attachment 2: TRCA Submission to ERO#019-1371

Attachment 3: TRCA Submission to ERO#019-1303

Attachment 4: TRCA Submission to ERO#019-1536

Attachment 5: TRCA Submission to ERO#019-1503

Attachment 6: TRCA Submission to ERO#019-1682

Attachment 7: TRCA Submission to ERO#019-1749

Attachment 8: TRCA Submission to ERO#019-1679 & #019-1680

Attachment 9: TRCA Submission to ERO#019-1340

Attachment 10: TRCA Submission to ERO#019-1712

Attachment 11: TRCA Submission to ERO#019-1883

Attachment 12: TRCA Submission to ERO#019-1080

Attachment 13: TRCA Letter to Ontario's Advisory Panel on Climate Change