

Formal Consultation Comments on the April 24, 2014 Revised Proposed Source Protection Plan and Explanatory Document

Comment From	Date Received	SPP or ED	Policy/Section Reference	Comment	SPC Response	SPAs Response
MTO	23-May-14	SPP	SALT(App)-2	Suggested change in policy wording "The MTO shall be encouraged to continue to share results of research into cost effective alternatives to salt application, new mitigative technologies, and innovative practices that do not compromise public safety in vulnerable areas where the application of salt would be a significant drinking water threat."	This policy has been previously considered by the SPC upon receipt of the draft Director's letter, and updated to incorporate the preferred wording of "... Share results of research into cost effective alternatives to salt application, new mitigative technologies, and innovative practices that do not compromise public safety in....". The policy; however, does encourage that research continue to be undertaken, and that some level of collaboration between the road authorities in the province will be necessary to achieve the goal of reducing salt application rates in vulnerable areas.	The source protection authorities support the approach the source protection committee took to address this comment.
MTO	23-May-14	SPP	MON-3	Request to be exempt from policy. Suggested change in policy wording " By February 1 of each year, OMAFRA shall report to the local source protection authority on the steps taken in the previous calendar year to implement these significant threat policies and recommendations, where appropriate." The Conservation Authorities (CA) are responsible for the development and reporting of their source water protection plans. The responsibility to ensure the report is complete falls with the CA. MTO is strongly recommending that each CA send MTO a notice when they initiate their reviews of the plan and ask MTO for an update at that time.	Source Protection Plans are required to contain monitoring policies for each significant drinking water threat policy. As an implementing body of a significant drinking water threat policy the MTO is obligated to participate in providing the required information for the SPAs to synthesize the annual report.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	WAST(a)-2	1. Policy WAST(a)-2 is a future PI waste policy that prohibits the application of untreated septage to land where it would be a moderate or low drinking water threat. <u>Prohibition cannot be applied to moderate or low threats as per O.R. 287 s. 32(3).</u> <u>(i) Please remove this policy from the SPP;</u> <u>OR</u> <u>(ii) Revise the policy wording to manage, rather than prohibit, the activity through an ECA.</u>	This policy was previously updated upon receipt of the Draft Directors letter. The policy has been revised to be in compliance with the Clean Water Act, and now requires that Source Water Protection Concerns be considered when issuing Environmental Compliance Approvals for the application of untreated septage to land in areas where the activity would be a moderate or low drinking water threat.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	LSTOCK-1 & LSTOCK-2	2. Policies LSTOCK-1 and LSTOCK-2 is a Section 57 prohibition policy written to address existing and future livestock pasturing and grazing. As per O.R. 287/07 s. 31, a Source Protection Plan must identify the area to which a significant threat policy applies. As currently written, the policies would imply that existing and future livestock grazing and pasturing is prohibited anywhere the number of animals on land at any time is sufficient to generate nutrient at an annual rate >0.5NU/acre. Please revise these policies to designate the area where they would apply.	This policy was previously updated upon receipt of the Draft Directors letter. Policy LSTOCK-1 applies where the number of animals on the land at any time is sufficient to generate nutrients at an annual rate that is equal to or less than 0.5 NU/acre. Policy LSTOCK-2 applies when the number of animals on the land at any time is sufficient to generate nutrients at an annual rate that is greater than 0.5 NU/acre. However, since receipt of this comment an additional comment has been received and the policy approach has been revised. As a result of the additional information provided by the agricultural representatives the SPC revised the policy approach for Livestock Grazing and Pasturing threats where nutrient units/acre are generated at an annual rate of 0.5 or less. Where nutrient units/acre are generated at an annual rate of 0.5 or less significant threats will be dealt with through the use of education and outreach tools. Livestock grazing and pasturing that generates nutrient units/acre at an annual rate of 0.5 or greater will continue to be prohibited.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	SEWG(b)	Policy categories SEWG(b) includes a specify action policy written to manage stormsewer surges within the SPR. It is currently unclear if the overall suite of policies are intended to capture Combined Sewer Overflow (CSO) outlets to surface water, or whether the activity is only covered by policy SEWG(b)-5. TCE has been identified as an issue, such as in the Cannington WTP, and a policy is required to address this subcategory of sewage to address this issue.	This policy was previously updated upon receipt of the Draft Directors letter. The policy has been revised to reference combined sewer overflow outlets.	The source protection authorities support the approach the source protection committee took to address this comment.

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MOE Director's Letter	23-May-14	ED	ED Rationale	As per Section 40(2) paragraph 1 of O. R. 287/07, an explanation of the SPC's reasons for choosing a specific tool for each policy set out in the source protection plan is required. Currently, the SBGLS Plan prohibits a number of existing activities, such as agricultural threats, either using Part IV (Section 57) or by prohibiting through PI. The Explanatory Document is written in a very general manner and does not give a complete indication on the level of participation in these activities, only that it was a consideration in the SPC's discussions, making it difficult to determine the degree of impact these policies will have within the SPR. If prohibition tools are used to address existing threats, there is a legislative requirement to have clear language within the ED on why prohibition, instead of management as the choice of tool. Please add additional detail and rationale regarding the degree of impact of these policies to the Explanatory Document in addition to clearer justification as to why prohibition rather than management tools were selected for specific threats.	This comment was previously considered and addressed upon receipt of the Draft Directors letter. Results of Threat Verification work carried out across the Source Protection Region has allowed the SPC to gain a greater understanding of the impact of existing prohibition policies. The Explanatory Document has been updated to reflect this understanding, and the rationale behind why prohibition was the tool of choice over management. In addition, a meeting was held with MOE and OMAF staff to further explain the rationale for the existing prohibition policies.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	WAST(b)-1	Policy WAST(b)-1 is a section 57 policy that prohibits the existing and future establishment operation or maintenance of a waste disposal site within the meaning of Part V of the EPA where there is no applicable PI. The policy as submitted, could affect certain existing generators and the impact could be more extensive than intended. For example, there is an employment land in Aurora which could be affected as these activities are commonly associated with many activities, including employment uses. In order to clarify the policy intent, it is the Ministry's understanding that the SPC has chosen to amend the policy to address threats from waste classes (P)(Q)(R)(S)(T)(U) of the definition of hazardous waste using education and outreach (E&O) and to address PCB and liquid industrial waste threats using RMPs to manage existing sources of waste and use Section 57 to prohibit future sources of waste.	Yes, the Ministry does have a correct interpretation of the policy changes since receipt of the draft Director's letter. The additional information regarding the types of wastes captured in clauses (p),(q),(r),(s),(t), (u) of the definition of hazardous waste prompted a change in the proposed policy approach. Existing and future waste threats from clauses (p),(q),(r),(s),(t),(u) of the definition of hazardous waste will be addressed through education and outreach. While RMP's will be used to address existing PCB/ hazardous liquid industrial waste threats, and a prohibition will be in place for future proposals of these threat activities.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	LUP-1	<p>6. Policy LUP-1 is a Land Use Planning (LUP) policy which requires the Planning Approval Authority to amend their planning documents to prohibit a variety of land uses in the future. <u>Depending on the types of uses that are present or planned in the vulnerable areas, using the LUP tool could pose some challenges during implementation.</u></p> <p>A number of threat categories are included in the policy, however there are specific concerns with two categories:</p> <p>Category #1 is for waste disposal sites within the meaning of Part V of the EPA. In addition to larger facilities such as landfills and transfer stations, this threat also includes smaller amounts of waste generated onsite at facilities such as auto body repair shops, hospitals and industrial sectors. It may be challenging to prohibit small amounts of hazardous waste (pqrstu), liquid industrial waste and PCB waste that are stored prior to disposal using LUP. Given this, the SPC should consider the impact of the LUP policy, as written, to ensure they considered the potential impacts. In some cases, the LUP tool may be appropriate, for example, in rural or residential settings, where growth and development is not anticipated to occur, restricting these types of waste using land use planning may be both appropriate and effective. However, <u>if areas of growth and development are proposed, the committee should consider the impact of prohibiting future land uses, such as commercial and industrial/ employment land uses.</u></p> <p><u>Please review the list of associated activities with these types of waste as outlined in item #5. It would be helpful to clarify in the policy and ED that activities which are not subject to PI are also not subject to the LUP policy.</u></p> <p>Category #15 is for fuel storage. <u>It is currently unclear if this also includes residential heating fuel. If that is the intent, it could have the effect of prohibiting some residential development where there is no natural gas servicing.</u></p> <p><u>We would like to have a discussion about this policy given the statements above. The SPC should consider the approach they have taken and assess if it addresses the threat as intended or if changes need to be</u></p>	This policy has been previously updated to address the comment with regards to the prohibition of waste disposal sites. The policy has been revised to exclude the storage of small amounts of wastes described in clauses (p),(q),(r), (s), (t), (u) of the definition of hazardous waste in O.Reg 347. The policy has not been revised as a result of the comment with regards to fuel storage. The policy as proposed, and intended currently specifies that Planning Approval Authorities shall amend their planning documents to prohibit all fuel storage where it would be a significant drinking water threat. This includes residential home heating fuel. The SPC notes that their are alternatives to home heating fuel where natural gas service does not exist. The explanatory document contains further information on the rationale for the prohibition of future fuel tanks in vulnerable areas where they would be significant drinking water threats.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	TRANS-1	<p>7. Policy TRANS-1 is a transitional policy which outlines the definition for existing and future threats. Given the plan transitions many planning applications, part (b) of the policy should also include permits under the Niagara Escarpment Planning and Development Act.</p> <p>In the Niagara Escarpment Development Control Area (NEDCA), development permits are required and issued, and municipal zoning does not apply. It appears that there are two municipal wellheads that are located in these areas, and, given the policies for other planning applications, development permits should also be transitioned. If these permits are not transitioned then development may be treated unfairly. For example a building permit outside the NEDCA could proceed, however a development permit may be prevented from proceeding.</p> <p>Please revise the policy to ensure that permits in the NEDCA area are transitioned properly</p>	This policy was previously updated upon receipt of the Draft Director's letter. The transition provision has been revised to transition development permits being issued within the Niagara Escarpment Development Control Area.	The source protection authorities support the approach the source protection committee took to address this comment.

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MOE Director's Letter	23-May-14	SPP	RLU-1	<p>8. Policy RLU-1 is a Restricted Land Uses (Section 59) policy which requires all building permits and planning applications to be reviewed by the RMO for designated threat activities. In areas where DNAPLS could be a SDWT, this could be a large area as this threat is significant within the WHPA C area. This policy could require the RMO to review minor applications such as routine house renovations. The York Region RMO office has communicated to the SPC the need to reduce the number of planning and building applications reviewed by their office.</p> <p>Since providing the SPC with the above comment, it is the Ministry's understanding that York Region's concerns have been addressed through modification of the policy. During resubmission, please include a summary of the new rationale for the policy and the outcome of any of the discussions</p>	Yes, the Ministry does have a correct understanding of the policy changes since receipt of the draft Director's letter. As requested, the explanatory document has been updated to explain the rationale for the policy change to provide RMOs with flexibility regarding the types of permits that need to be circulated through the Risk Management Office.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE's Director's Letter	23-May-14	SPP	FUEL-1	<p>9. Policy FUEL-1 is a section 58 policy which requires a Risk Management Plan where the handling and storage of fuel is a significant threat. The policy contains a low density residential property exemption from the RMP provided that documentation can be provided to the RMO proving that the fuel tank is certified and up to contemporary standards. York Region has expressed concern that this could be a large area for the RMO to visit to require validation of documentation, in addition to potentially implement RMPs which would be overwhelming for the RMO office. Durham Region has also expressed concerns with this policy as the methods, from the three plans (SGBLS, CTC and TCC) they are required to implement, manage this threat differently.</p> <p>It is the Ministry's understanding that York Region and the SPC were able to reach a compromise on the policy FUEL-1 that addresses all of the concerns raised by York Region, Durham Region and the City of Barrie. During resubmission, please include a summary of the new rationale for the policy and the outcome of any of these discussions.</p>	Yes, the Ministry is correct in understanding the SPC, the Regions or York, Durham and City of Barrie were able reach a compromise on policy FUEL-1. The policy has been revised to fully exempt low density residential properties from requiring a risk management plan. As requested, the explanatory document has been updated to incorporate the new policy rationale, and the outcome of the policy discussions.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	SALT(ICA)-1	<p>Policy SALT(ICA)-1 is a salt application policy within the Barrie ICA (sodium and chloride) where existing and future applications of salt would require a RMP within the WHPA-A portion of the ICA. There is a low density residential property exemption from the policy which means residential properties will be addressed by two EO policies. The title of the policy indicates that it is an ICA policy therefore additional clarity is required to indicate that the policy is specific to the WHPA-A portion of the ICA. Additionally please consider having discussions directly with the City of Barrie to clarify the intention of the policy, the area where the policy applies, and workload involved. During resubmission, please include a summary of any new rationale for the policy and the outcome of any of these discussions.</p>	This policy was previously updated upon receipt of the draft Director's letter. The policy has been revised to clarify that it only applies within a WHPA-A of the Issue Contributing Area. Conversations with the City of Barrie were undertaken. The City of Barrie is in support of the policy as written.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE's Director's Letter	23-May-14	SPP	DEICE-1	<p>11. Policy DEICE-1 is a future Non-Legally Binding (NLB) policy which requires Transport Canada to include appropriate design standards and management practices to prevent run-off from airport de-icing facilities. Transport Canada has recently indicated that they not have a role in the approval or construction of new airport facilities.</p> <p><u>It is recommended to change the implementing body to "airport authorities or operators" which would target the appropriate implementer of the policy; and modify the associated monitoring policy (MON-4) to designate a public body.</u></p>	This policy was previously updated upon receipt of the draft Director's letter. The policy has been revised to list "airport authorities or operators" as the implementing body. The associated monitoring policy has been revised to capture the appropriate implementing body.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE's Director's Letter	23-May-14	SPP	DEICE-2	<p>12. Policy DEICE-2 is directed to the local SPA to collect data regarding the number of environmental assessments initiated for new airport authorities within vulnerable areas from Transport Canada on an annual basis. Transport Canada has recently indicated that they do not have a role in the approval or construction of new airport facilities.</p> <p>Under the Canadian Environmental Assessment Act (2012), the responsibility for conducting an environmental assessment for designated projects (excluding nuclear and international and interprovincial pipelines and transmission lines) rests with The Canadian Environmental Assessment Agency.</p> <p><u>The SPC should consider the intention of the policy and the associated approach they have taken. Some possible considerations include: designating an appropriate implementing body, the frequency of reporting, in addition to any changes to the policy text.</u></p>	This policy was previously updated upon receipt of the draft Director's letter. The policy has been revised to require the local SPA to collect information from the Canadian Environmental Assessment Agency. The policy is legally binding and lists the SPA as the implementer.	The source protection authorities support the approach the source protection committee took to address this comment.

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MOE Director's Letter	23-May-14	SPP	RCHG-1	15. Policy RCHG-1 is a NLB policy which encourages MMAH, MOI and MOE to examine municipal water supply constraints when approving settlement area expansions within the WHPA Q2 area. In the proposed consultation stage, both MMAH and MOI suggested the policy would be more appropriately directed at the Planning Approval Authority which would also change the policy to be legally binding. The SPC indicated in their proposed comments a willingness to make the change, but did not actually change the implementing body prior to submission of the SPP. <u>We understand that the SPC has indicated through Neil Gervais that they would still like to amend the policy to name the Planning Approval Authorities as the implementing body. Please proceed to make this change when considering the other revisions set out here.</u>	This policy was previously updated upon receipt of the draft directors letter. The policy has been revised to reference Planning Approval Authorities, and is therefore no longer directed at individual provincial ministries. The policy has also been re-designated as a land use planning policy.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	SALT(App)-2	16. Policy SALT(App)-2 is a policy directed to MTO, Ontario Good Roads Association (OGRA) and Association of Municipalities Ontario (AMO) which encourages research into cost-effective alternatives to salt application that do not compromise the safety of the public in vulnerable areas. <u>MTO recommended the policy text be revised to include innovative practices and new mitigative technologies and to share the results of the research with representatives of other road authorities, including the OGRA and AMO. We understand that the SPC has indicated they would be willing to make these proposed changes. Please proceed to make this change when considering the other revisions set out here.</u>	This policy has been previously considered by the SPC upon receipt of the draft Director's letter, and updated to incorporate the preferred wording of "... Share results of research into cost effective alternatives to salt application, new mitigative technologies, and innovative practices that do not compromise public safety in...". The policy; however, does encourage that research continue to be undertaken, and that some level of collaboration between the road authorities in the province will be necessary to achieve the goal of reducing salt application rates in vulnerable areas.	The source protection authorities support the approach the source protection committee took to address this comment.
MOE Director's Letter	23-May-14	SPP	DEMD-1	19. DEMD-1 is a Prescribed Instrument water quantity policy which addresses existing and future activity in WHPA-Q1 through Permit to Take Water (PTTW). Part 3 of the policy makes reference to ensuring that ecological and hydrological integrity is not adversely affected. This statement does not align with the requirements of Section 22 of the CWA which requires policies to have the objective of ceasing to be a Significant Drinking Water Threat. <u>Although ecological and hydrological functions are important to maintain, the Ontario Water Resources Act (OWRA) has the authority and tools to address these impacts. The CWA does not give authority to write policies to address ecological impacts; therefore, this reference needs to be removed from the policy.</u>	This policy was previously updated upon receipt of the draft directors letter. The policy has been revised to remove references to ecological impacts.	The source protection authorities support the approach the source protection committee took to address this comment.
Penetanguishene	23-May-14	SPP		I spent the last several nights reviewing the revised materials and can't think of comments that we would provide. Any of the technical changes to the water budget report is far beyond my area of expertise, so I will defer to the science and we will ensure our planning policies respect what we need them to when we arrive at that stage.	The SPC is appreciative of the time the Town has taken to review the changes to the Source Protection Plan and Assessment Report. This comment has been received for information.	The Source Protection Authorities are appreciative of the time the Town has taken to review the changes to the Source Protection Plan and Assessment Report. This comment has been received for information.

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York Region	23-May-14	SPP	LUP-12	Should reference to site alteration be deleted (as it is not major development)? Consider adding the flexibility of off-site compensation as per the CTC policy (REC-1 (2)(b)) Where necessary, implementation and maximization of off-site recharge enhancement (within the same WHPA-Q2) to compensate for any predicted loss of recharge from the development).	The reference to site alteration in policy LUP-12 has been removed. In addition, the policy has been updated to add in flexibility for off-site compensation where recharge rates cannot be maintained onsite.	The source protection authorities support the approach the source protection committee took to address this comment.
York Region	23-May-14	SPP	Section 16.13.1	EDU-8 is specific to the City of Barrie and should be included in section 16.13.1.	The list of policies that also applies to the Salt ICA (Section 16.13.1) has been updated to include a reference to EDU-8	The source protection authorities support the approach the source protection committee took to address this comment.
York Region		SPP	FUEL-4	Type in last line of policy wording. Handling and storage of fuel should be changed to handling and storage OF fuel.	The policy has been corrected to read "handling and storage of fuel".	The source protection authorities support the approach the source protection committee took to address this comment.
York Region	23-May-14	SPP	FUEL-4	Policy currently applies to Existing and Future, but the text only refers to existing tanks on the landscape. FUEL-2 prohibits future use, therefore the policy should reference future threats only. TYPO - "the handling and storage OF fuel "Policy should be reworded - consider "...and unused tanks from occupied properties once no longer in use"	The policy has been updated to reflect the suggested wording changes.	The source protection authorities support the approach the source protection committee took to address this comment.
York Region	23-May-14	SPP	Additional DNAPL Policies (pg 113)	All of the above referenced policies and INCENT-6 apply to the Orillia, Coldwater and Cannington issues contributing area (TCE). There is no mention of TCE or DNAPL in INCENT-6 - perhaps the wrong policy was referenced here?	Policy INCENT-6 was intended to capture all Issues identified in the Source Protection Region. The policy has been updated to incorporate a reference to the TCE Issue Contributing Areas.	The source protection authorities support the approach the source protection committee took to address this comment.
York Region	23-May-14	SPP	LUP-1	revise to 16) DNAPL storage- remove "s" from DNAPLs to stay consistent with other types of storage listed	The "s" has been removed from DNAPLs to maintain consistency with other types of storage listed.	The source protection authorities support the approach the source protection committee took to address this comment.
York Region	23-May-14	SPP	EDU-10	all of the organic solvents were listed but not all of the DNAPLs - 1,4-Dioxane and PCE are missing from the list?	The policy has been updated to reference the missing DNAPLs.	The source protection authorities support the approach the source protection committee took to address this comment.
Durham Region	23-May-14	SPP	DEMD-3	A water conservation plan developed to meet the future requirements under the Water Opportunities Act should integrate and meet source protection policy requirements so there is no duplication of effort	The SPC agrees with the Region's comment. The policy as proposed provides the municipality with the flexibility to either update existing water conservation plans or develop new water conservation plans to meet the intent of the policy.	The source protection authorities support the source protection committees response to this comment.
Durham Region	23-May-14	SPP	DEMD-4	Region agrees that MOE should adopt and fund on-going maintenance of the Tier 3 Water Budget numerical models	The SPC is appreciative of this comment. It has been received for information.	The source protection authorities support the approach the source protection committee took to address this comment.

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Agricultural SPC Members	7-Apr-14	SPP	PEST(App)-1	The application of all pesticides should not be prohibited where significant. Pesticide application should be permitted, as long as the label is followed. *Since this comment was submitted it was determined that the policy had been misread.	Since submission of this comment, it has been determined that this policy has been misread, and that the comment no longer applies. The policy as proposed does not prohibit pesticide application. The application of pesticides where significant will be permitted subject to a risk management plan. The	The source protection authorities support the source protection committees response to this comment.
Agricultural SPC Members	7-Apr-14	SPP	Commercial Fertilizer and ASM Application policies for the Georgian Sands /Lafontaine ICA	Concern was expressed that policies proposing the prohibition of commercial fertilizer and agricultural source material in areas with a vulnerability score of 10 within the ICA will take large tracts of agricultural land out of production. All Significant threat activities being carried out in the ICA area should be treated in the same fashion; if one type of significant threat is prohibited, all significant threat activities should be prohibited. Further concern was expressed over the addition of a new well that would extend the area in which the ICA policies would apply and further impact agricultural lands in the area.	Threat verification work conducted in the Lafontaine and Georgian Sands ICAs has indicated that there are no agricultural properties within the Lafontaine WHPA would be subject to the prohibition policies. For the Georgian Sands WHPA, there is one small area where the prohibition would apply to an existing agricultural operation. This small area is associated with a 30m buffer delineated around a transport pathway (substandard well). The SPC has included additional policies in the Source Protection Plan to address the transport pathway. Once the Transport Pathway is addressed no agricultural lands will be impacted by a prohibition policy.  Recent information from the Township of Tiny and SSEA has indicated that the locations of the future well is currently proposed to be located outside of the ICA, and will be screened in the A3 aquifer. This aquifer is deeper than the shallow aquifers from which the municipality currently obtains their drinking water. Preliminary water testing of the potential new well indicates nitrate levels well below the ODWS. The preliminary testing is indicating that the new well likely will not be classified as in ICA for nitrate in the future.	The source protection authorities support the source protection committees response to this comment.
Agricultural SPC Members	7-Apr-14	SPP	LSTOCK-1 /LSTOCK-2	Concern was expressed over the designation of livestock grazing and pasturing as a significant threat when the nutrient units/acre threshold on the property is less than 0.5NU/acre. Grazing and pasturing animals resulting in less than 0.5 NU/acre improve the health of soil; with healthier soil water is better filtered. Livestock grazing and pasturing activities resulting in less than 0.5 NU/acre should not be designated as a significant threat and RMPs should not be required. RMPs should be required when the NU/acre threshold exceeds 0.5.	As a result of the additional information provided by the agricultural representatives the SPC revised the policy approach for Livestock Grazing and Pasturing Threats where nutrient units/acre are generate at an annual rate of 0.5 or less. Where nutrient units/acre are generated at an annual rate of 0.5 or less significant threats will be dealt with through the use of education and outreach tools. Livestock grazing and pasturing that generates nutrient units/acre at an annual rate of 0.5 or greater will continue to be prohibited.	The source protection authorities support the approach the source protection committee took to address this comment.
New Tecumseth	23-May-14	SPP		We have had a chance to review the plan and a Report is tentatively scheduled to go forward to the June 2, 2014 Committee of the Whole meeting pending approval by the Town's Management Team. At this point staff have no comments on the proposed changes, however I can't speak for what Council might say.	The Source Protection Committee is appreciative of the time the Town has taken to review the changes to the Source Protection Plan and Explanatory Document. This comment has been received for information.	The Source Protection Authorities are appreciative of the time the Town has taken to review the changes to the Source Protection Plan and Explanatory Document. This comment has been received for information.