

SPP Volume I Suggested Changes

Staff have been keeping a log of all changes to date to the SPP. These changes are colour coded to make review and discussion easier. Please refer to the legend below. Not all sections in the table will be reviewed during the meeting. Staff have selected sections to review that are most representative of the changes being made and/or may generate discussion. These section #'s are highlighted in **dark green**. Please feel free to request additional section #'s for discussion as we go through the table.

Legend

White Cells- original policy text

Grey Cells- new policy text

Yellow highlight- area of original policy text to be changed (already reviewed by SPC)

Bright Green highlight- area of new policy text (already reviewed by SPC)

Magenta highlight- area of original policy text to be changed (not yet reviewed by SPC)

Blue highlight- area of new policy text (not yet reviewed by SPC)

Dark Green highlight- policy selected for discussion at SPC meeting

Section	Page	Text	Change Made
2.1	8	Policies for water quantity threats (to be addressed in updated versions of Source Protection Plan, if needed, once Tier 3 Water Budget is completed and included in the Assessment Reports).	
2.1	8	Policies for water quantity threats (Tier 3 Water Budget concluded that there are no significant threats to Water Quantity, therefore no policies are required for water quantity).	Addition of Tier 3 Water Budget results

Table Error! No text of specified style in document.-1 Approved Assessment Reports in the Thames-Sydenham and Region

Source Protection Area	Approved		Update Submitted	
	Version	Date	Version	Date
Lower Thames Valley Source Protection Area	Amended Proposed Assessment Report	Nov.12, 2010	Updated Assessment Report	Nov 14, 2014
St. Clair Region Source Protection Area	Updated Assessment Report	Revised Nov.18, 2011	Updated Assessment Report	Nov 14, 2014
Upper Thames River Source Protection Area	Amended Proposed Assessment Report	Revised Aug. 12, 2011	Updated Assessment Report	Nov 14, 2014

Section	Page	Text	Reason For Change
2.53	11	System summaries, available in the appendices of each Assessment Report, were developed as part of the Assessment Report to provide a quick summary of the information pertaining to the municipal systems in the Region. It is planned that these summaries will be updated to include an overview of the policy which affects the vulnerable areas. The summaries are contained on the Source Protection Plan DVD and on the Thames-Sydenham and Region website.	
2.53	11	System summaries were developed as part of the Assessment Report to provide a quick summary of the information pertaining to the municipal systems in the Region. These summaries have been removed from the Appendices of the Assessment Reports so that they may be updated from time to time. They will be updated to include an overview of the policies which affect the vulnerable areas. The summaries are contained on the Source Protection Plan DVD and on the Thames-Sydenham and Region website.	System summaries being removed from ARs so that they can be updated as

			Reason For Change
2.55	12	Early engagement was a crucial step in ensuring transparency. Early engagement included the development of a First Nations Liaison Committee to engage First Nations in the policy development process; the establishment of municipal forums (including providing presentations to councils to keep municipalities engaged in policy development); and the development of the Conservation Authority disclosure service. This service was incorporated into the CA planning advisory and permitting process. This service was intended to raise awareness of the vulnerable areas as well as inform proponents of projects that the activities that they were or planning to engage in were in vulnerable areas which may be affected by Source Protection Plans. This service augments the required notification of the property owners who are believed to be engaged in activities which may be significant threats to include those who may be planning for such activities in the future.	
2.55	12	Early engagement was a crucial step in ensuring transparency. Early engagement included the development of a First Nations Liaison Committee to engage First Nations in the policy development process; the establishment of municipal forums (including providing presentations to councils to keep municipalities engaged in policy development); and the development of the Conservation Authority disclosure service. This service was incorporated into the CA planning advisory and permitting process. This service was intended to raise awareness of the vulnerable areas as well as inform proponents of projects that the activities that they were e planning to engage in were in vulnerable areas which may be affected by Source Protection Plans. This service augments the required notification of the property owners who are believed to be engaged in activities which may be significant threats to include those who may be planning for such activities in the future.	Deleted the word or
Table 3-1	16	Water Quantity - (dependent on the outcome of the Tier 3 Water Budget and the Water Quantity Risk assessment)	
Table 3-1	16	Water Quantity - Tier 3 Water Budget concluded that there are no Water Quantity SDWT	Addition of Tier 3 Water Budget results
3.1.2.1	19	The Planning Act was not designed to regulate ongoing activities on a specific parcel of land. Section 58 (regulated activities) has been provided under the CWA as a way to address this “gap.” This approach introduces the idea of Risk Management Plans (RMPs), which set out the safety or protective measures that a property owner will take to ensure that a significant threat is sufficiently managed such that it ceases or (or never becomes) a significant drinking water threat. RMPs are intended to be site-specific using principles from Best Management Practices to form the foundation of these plans.	
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3.1.2.1	19	Under Part IV of the CWA, Section 59 (restricted land uses) has been provided as an approach that provides a process	

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		<p>for implementing policies associated with Section 57 (prohibition) and Section 58 (regulated activities) and, as such, cannot be used by itself. This approach provides an additional safety barrier by flagging new Planning Act applications</p> <p>Planning Act or Building Permit approvals are issued. In areas where Section 59 apply, an individual or business Management Official for a notice before proceeding to receive a building permit or Planning Act approval. The Risk activity is prohibited through Section 57 of the CWA, the application would not proceed. If the activity has been identified as a regulated activity under Section 58 of the CWA, the application can proceed once a notice has been provided by the RMO, which will occur after an RMP has been completed. This notice will be recognized as applicable law under in next amendment of the Building Code Act. As such, this approach provides a link between Part IV of the CWA and municipal planning and makes a proponent aware of restrictions that may be associated with a specific activity and land use.</p>	
3.1.2.1	19	<p>Under Part IV of the CWA, Section 59 (restricted land uses) has been provided as an approach that provides a process for implementing policies associated with Section 57 (prohibition) and Section 58 (regulated activities) and, as such, cannot be used by itself. This approach provides an additional safety barrier by flagging new Planning Act and Condominium Act applications and Building Permits where significant drinking water threat activities are associated with specifically named land uses. This flagging process ensures that applicants are following the applicable Source Protection Plan policies before Planning Act, Condominium Act or Building Permit approvals are issued. In areas where Section 59 apply, an individual or business proposing to construct or change the use of a building for a land use named in the policy is required to apply to the Risk Management Official for a notice before proceeding to receive a Building Permit, Planning Act or Condominium Act approval. The Risk Management Official reviews applications and assesses them in accordance with the Source Protection Policies. If the activity is prohibited through Section 57 of the CWA, the application would not proceed. If the activity has been identified as a regulated activity under Section 58 of the CWA, the application can proceed once a notice has been provided by the RMO, which will occur after an RMP has been completed. This notice will be recognized as applicable law under in next amendment of the Building Code Act. As such, this approach provides a link between Part IV of the CWA and municipal planning and makes a proponent aware of restrictions that may be associated with a specific activity and land use.</p>	Included Condominium Act and capitalized Building Permit
3.1.2.2	23	<p>The SPC has considered which approaches or combinations of approaches would work best in local circumstances to achieve the objectives set out in the Source Protection Plan. With few exceptions, the overall approach taken by the SPC to achieve this was to manage existing threats and prohibit future threats where possible and reasonable. Where it was not possible or reasonable, the practice was to adequately manage the threat.</p>	
3.1.2.2	23	<p>The SPC has considered which approaches or combinations of approaches would work best in local circumstances to achieve the objectives set out in the Source Protection Plan. With few exceptions, the overall approach taken by the SPC to achieve this was to manage existing threats and prohibit future threats where possible and reasonable. Where it was not possible or reasonable to prohibit future threats, the practice was to adequately manage the threat.</p>	Addition for clarification
3.1.3	23	<p>Consultation on the development of policies for the Source Protection Plan is outlined in the report <i>Thames-Sydenham Source Protection Plan Consultation and Stakeholder Engagement Plan, October 11, 2011</i> that is referred to in Section 2.5.5 in Volume I.</p>	

			Reason For Change
3.1.3	23	Consultation on the development of policies for the Source Protection Plan is outlined in the report <i>Thames-Sydenham Source Protection Plan Consultation and Stakeholder Engagement Plan, October 11, 2011, Updated November 2, 2012</i> that is referred to in Section 2.5.5 in Volume I.	Updated date
4.1.1.3	25	<p>Transportation of substances along corridors is not currently a prescribed drinking water threat; however, many Source Protection Committees requested that this activity be included as a local drinking water threat. Within the Thames-Sydenham and Region Source Protection Region, the transportation of liquid petroleum through pipelines and the transportation of fuel and fertilizer along roads, railways and waterways, could pose a risk to the quality of drinking water. This local threat was identified within the St. Clair Region Source Protection Area through event-based modelling. Event-based modelling was only completed for the IPZs of Sarnia (LAWSS), Petrolia and Wallaceburg.</p> <p>activities under the circumstances modelled constitute a significant threat to drinking water as the contaminants were found to be delivered to the intakes under an extreme event at a concentration which would exceed the drinking water quality standards for that parameter. Local threat policies related to these significant threats can be found in Section 3.2 of Volume III.</p>	
4.1.1.3	25	<p>Transportation of substances along corridors is not currently a prescribed drinking water threat; however, many Source Protection Committees requested that this activity be included as a local drinking water threat. The transportation of fuel along provincial highways, county and local roads, railways and waterways, has been identified as a local threat in Event Based Areas (EBA) in the St. Clair Region and Lower Thames Valley Source Protection Areas. The transportation of fertilizer and the transportation of liquid petroleum products through pipelines have also been identified as a local threat in the SCRSPA as it could pose a risk to the quality of drinking water. These local threats were identified within the SCRSPA and LTVSPA through event-based modelling. Event-based modelling, was used to determine where spills from either these local threats or related prescribed drinking water threats may be considered a SDWT. The event-based modelling has established these local threats as significant drinking water threats in the Event Based Areas (EBA) of:</p> <ul style="list-style-type: none"> LAWSS, Petrolia, and Wallaceburg intakes in the St Clair Region Source Protection Area, Wheatley intake in the Lower Thames Valley Source Protection Area, and Stoney Point intake in the Essex Regions Source Protection Area. <p>The modelling determined that these activities under the circumstances modelled constitute a significant threat to drinking water as the contaminants were found to be delivered to the intakes under an extreme event at a concentration which would exceed the drinking water quality standards for that parameter. Local threat policies related to these significant threats can be found in Section 3.2 of Volume III.</p>	Update to reflect Event Based Areas terminology and updated technical work.
5	29	Ontario has vast and varied landscapes, which lends itself to unique, locally-driven Source Protection Plans to be developed. What adequately protects the drinking water source in an area supplied by deep, well-protected bedrock aquifers and Great Lakes may not be sufficient in areas where aquifers are shallow and more vulnerable or where water comes from inland rivers or lakes. The Province, through the CWA and its associated regulations, has set expectations of how drinking water sources should be protected. Implementers and stakeholders also have expectations as to how drinking water sources should be protected. To achieve expectations related to consistency, the focus on policy development with neighbouring Source Protection Regions has been on the harmonization of the intent of policies and not the requirement of a “cookie cutter” approach, where the Plans are exactly the same for each Region of the Province. This has been facilitated through the collaborative forum of the Source Protection Planning	

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		Advisory Committee (SPPAC) facilitated by Conservation Ontario. To understand the development process and policy outcomes of the surrounding jurisdictions, Thames-Sydenham and Region also collaborated with Ausable Bayfield Maitland Valley (ABMV), Saugeen Grey Sauble Northern Bruce Peninsula, Essex and Lake Erie Source Protection Regions.	
5	29	Ontario has vast and varied landscapes, which lends itself to unique, locally-driven Source Protection Plans to be developed. What adequately protects the drinking water source in an area supplied by deep, well-protected bedrock aquifers or the Great Lakes may not be sufficient in areas where aquifers are shallow and more vulnerable or where water comes from inland rivers or lakes. The Province, through the CWA and its associated regulations, has set expectations of how drinking water sources should be protected. Implementers and stakeholders also have expectations as to how drinking water sources should be protected. To achieve expectations related to consistency, the focus on policy development with neighbouring Source Protection Regions has been on the harmonization of the intent of policies and not the requirement of a “cookie cutter” approach, where the Plans are exactly the same for each Region of the Province. This has been facilitated through the collaborative forum of the Source Protection Planning Advisory Committee (SPPAC) facilitated by Conservation Ontario. To understand the development process and policy outcomes of the surrounding jurisdictions, Thames-Sydenham and Region also collaborated with Ausable Bayfield Maitland Valley (ABMV), Saugeen Grey Sauble Northern Bruce Peninsula, Essex and Lake Erie Source Protection Regions.	Grammar edit
5	29	As previously stated, the Source Protection Plan comes into effect once the approval has been posted on the environmental registry. Implementation of the Source Protection Plan policies is discussed in and Section 2.4 of Volumes II and III. To aid in the implementation of these policies, transition provisions, which establish what activities may continue to proceed and not be subject to rules affecting existing activities rather than those which might affect future activities, have been developed. Details on transition provisions are also found in Section 2.4 of Volumes II and III.	
5	29	As previously stated, the Source Protection Plan comes into effect once the approval has been posted on the environmental registry. Implementation of the Source Protection Plan policies is discussed in Section 2.4 of Volumes II and III. To aid in the implementation of these policies, transition provisions, which establish what activities may continue to proceed and not be subject to rules affecting existing activities rather than those which might affect future activities, have been developed. Details on transition provisions are also found in Section 2.4 of Volumes II and III.	Added word ‘and’
5.1	29	The implementation of the Source Protection Plan policies found within Volumes II and III requires cooperation of various stakeholders. The specific legal effect of the policies has been identified within Volume II and Section 2.1 of III.	
5.1	29	The implementation of the Source Protection Plan policies found within Volumes II and III requires cooperation of various stakeholders. The specific legal effect of the policies has been identified within Section 2.1 of Volumes II and III.	Sentence structure corrected
5.1.1	29	The CWA and the source protection planning process were initiated by the Province, and as such, there is a certain for the review of and approval of this initial proposed Source Protection Plan as well as subsequent reviews and updates.	

			Reason For Change
5.1.1		The CWA and the source protection planning process were initiated by the Province, and as such, the Province has a certain level of responsibility for the implementation of the Source Protection Plan. The Minister of Environment is responsible for the review of and approval of this initial proposed Source Protection Plan as well as subsequent reviews and updates.	
5.4.3	34	Where issues have been identified in Section 5 of the Assessment Reports as potentially anthropogenic, further work is partially anthropogenic, then Issues Contributing Areas (ICA) must be determined. Once this determination has been completed, the policies of the Source Protection Plan will need to be assessed to determine if they adequately deal with the significant threats which contribute to the Issues. It is possible that other policies may need to be developed once ICAs have been developed.	
5.4.3	34	<p>Where issues have been identified in Section 5 of the Assessment Reports as potentially anthropogenic, further work may be required to determine if human activity may be contributing to the issue. If these issues are found to be wholly or partially anthropogenic, then Issues Contributing Areas (ICA) must be determined. Once this determination has been completed, the policies of the Source Protection Plan will need to be assessed to determine if they adequately deal with the significant threats which contribute to the Issues. It is possible that other policies may need to be developed once ICAs have been developed.</p> <p>An ICA is included in the UTRSPA Assessment Report for the Tabor wellfield which is part of the Woodstock system. More work is required to determine if and ICA is needed for the nearby Thorton wellfield. The policies in volume 2 have been updated to include policies to address significant threats contributing to the issue in the ICA.</p> <p>Nitrate monitoring has been included in policies to support the work required to determine an ICA for Wallaceburg, This will require further assessment at future updates to the SPP and AR.</p> <p>Microcystin LR has been identified as an issue for intakes in western Lake Erie. It has been identified as an issue under the Act and as such does not have an ICA associated with this issue. Additional monitoring and study is required to determine whether microcystin should be considered as an issue under the technical rules and an ICA delineated. The need for this additional work has been recognized in the policies of this SPP, however it will require re-assessment when the SPP and AR are next updated.</p>	Update based on new ICA work.
5.4.4	34	<p>This Source Protection Plan does not contain policies which address water quantity threats. This is due to the fact that a Tier 3 water budget has not been completed at the time of this Plan. A Tier 3 water budget is underway for some required for the Lower Thames Valley and St. Clair Region Source Protection Areas. Once the Tier 3 water budget and</p>	
5.4.4	34	A Tier 3 water budget was conducted for some systems in the Upper Thames River Source Protection Area. It was determined that a Tier 3 water budget was not required for the Lower Thames Valley and St. Clair Region Source Protection Areas. This Source Protection Plan does not contain policies which address water quantity threats. This is	Addition of Tier 3 Water Budget results

Section	Page		Reason For Change
5.4.7	35	The delineation and vulnerability assessment, issues evaluation and threats assessment for the Kettle and Stony Point IPZ-1 and 2 has been completed. The completed work needs to be incorporated into the Assessment Report for the St. Clair Region Source Protection Area. While the work did not identify any significant threats the First Nation may wish to develop policies related to moderate and low drinking water threats to be included in the Thames-Sydenham and Region Source Protection Plan. The Terms of Reference should also be amended to include this intake.	
5.4.7	35	The delineation and vulnerability assessment, issues evaluation and threats assessment for the Kettle and Stony Point IPZ-1 and 2 has been completed and incorporated into the Assessment Report for the St. Clair Region Source Protection Area. While the work did not identify any significant threats the First Nation may wish to develop policies related to moderate and low drinking water threats to be included in the Thames-Sydenham and Region Source Protection Plan. The Terms of Reference should also be amended to include this intake.	Updated to reflect Kettle Stony IPZ work.