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December 21, 2020

CL 23-2020, December 17, 2020
PEDC 10-2020, December 9, 2020
PDS 35-2020, December 9, 2020

Local Area Municipalities
Niagara Peninsula Conservation Authority

SENT ELECTRONICALLY

RE: Niagara Official Plan – Consultation Update

Regional Council, at its meeting of December 17, 2020, approved the following recommendation of its Planning & Economic Development Committee:

> That Report PDS 35-2020, dated December 9, 2020, respecting Niagara Official Plan – Consultation Update, **BE RECEIVED** and **BE CIRCULATED** to the Local Area Municipalities, and the Niagara Peninsula Conservation Authority (NPCA).

A copy of Report PDS 35-2020 is enclosed for your information.

Yours truly,

Ann-Marie Norio
Regional Clerk
:me

CLK-C 2020-224

Distribution List: D. Heyworth, Official Plan Policy Consultant
D. Giles, Acting Commissioner, Planning & Development Services
N. Oakes, Executive Assistant to the Commissioner, Planning & Development Services

Subject: Niagara Official Plan - Consultation Update

Report to: Planning and Economic Development Committee

Report date: Wednesday, December 9, 2020

Recommendations

1. That Report PDS 35-2019 providing an update on consultation for the Niagara Official Plan since March 2020 **BE RECEIVED** for information; and

2. That Report PDS 35-2020 **BE CIRCULATED** to the Local Area Municipalities and the Niagara Peninsula Conservation Authority (NPCA).

Key Facts

- The purpose of this report is to provide Council with an update on consultation which has taken place on the Niagara Official Plan since the last update provided in March 2020.

- The consultation strategy for the Niagara Official Plan is multi-layered, and includes consultation with the public, stakeholders, local planning departments and decision-makers.

- Overall, most participants have shown an interest in several topic areas of the Official Plan and recognized the interrelationships between topic areas.

- Our engagement showed that managing growth is the key challenge and opportunity. This includes recognizing the heterogeneous communities in Niagara while accommodating the growth that is coming; create thriving complete resilient communities; assist in addressing affordable housing and aging-in-place; address our changing climate and protect our significant natural heritage and water systems.

Financial Considerations

Council approved the resources to complete the New Official Plan over a 5 year period as part of the 2017 Budget Process.

The completion of the necessary background studies and preparation of the Niagara Official Plan along with appropriate consultation will require significant staff resources.

Analysis

Public Consultation

The Planning Department had to reconsider the delivery of consultation given the COVID pandemic. However, the use of virtual consultation methods along with the ability for citizens to call staff for discussion has been successful.

Since the last consultation update, public consultation has occurred through virtual Public Information Centres (PICs) and on-line surveys.

On-line surveys are demonstrating that they reach a broader audience and gather input from a wider demographic and participation across all municipalities. Virtual PICs allow attendees to bringing forward questions and discussion on specific topics of interest resulting in more detailed discussion. Together, both of these formats are attracting more participation and complementing each other.

Virtual PICs

During the months of September/October 2020, six virtual PICs were held on key topic areas of the Official Plan. The following metrics are associated with these PICs:

PICs	Attendance	Questions
Natural Heritage System Options	68	64
Water Resource System Options and Watershed Planning	55	40
Growth Management (Regional structure, land needs, growth allocations, settlement area boundary review, housing)	79	41
Employment lands, Urban Design, District & Secondary Plans	35	7
Agriculture, Aggregates and Archeological Master Plan	57	15
Transportation, Servicing, and Storm Water	38	44

PICs	Attendance	Questions
TOTAL	**332**	**211**

Sessions lasted from approximately 90 minutes to two hours. Each session started with a staff and/or consultant presentation of 30-60 minutes followed by questions and answers. Participants could ask questions by typing and submitting questions or by calling-in. A recording of each virtual PIC, a copy of the presentation, and a table with input received in comment form and answers to questions that could not be provided during the sessions due to time constraints or need for further analysis are also posted on the Niagara Official Plan webpage.

A summary of the input received at the virtual public webinars is provided in two formats. The first is an outline of key themes raised through questions/comments for each session attached as **Appendix "1"**. The second is the detailed questions and comments (as submitted) received for each of the six sessions attached as **Appendix "2".**

We highlight the following overall themes:

- Many participants are interested in several topic areas of the Niagara Official Plan recognizing the interrelationships between topic areas.

- There is some understanding that growth management, infrastructure and the natural environment cannot be considered in isolation of each other. This is essential to understanding the Niagara Official Plan, and we will need to strengthen this message moving forward.

- The role of regional versus local planning for various policy sections will need to be clarified moving forward.

- Managing growth properly is the key to good planning for all the interrelated topics of the Niagara Official Plan.

- A comprehensive consultation report will be provided in the next several months for the Natural Environment Work Program that analyses the input received through the virtual PICs along with all the other input received through the 2nd Point of Engagement in greater detail.

Online Surveys

Two online surveys, an Employment Policy Survey and Growth Management Survey have been conducted. Surveys were available online for approximately 1 month and were promoted through social media and stakeholder e-mailing to gather input.

Employment Policy Survey

There were 97 respondents to the Employment Policy Survey with participation largely reflective of the stakeholders consulted through the Region's Employment Strategy work. All municipalities were represented in terms of responses relative to location of residence and work.

Key themes extracted from the survey are provided in **Appendix "3".** Many of these themes extend beyond the scope of the land use policy parameters of the Niagara Official Plan. However survey results will be shared with the Region's Economic Development and Transportation Divisions. The land use related themes are as follows and will be addressed by the employment program for the Official Plan:

- Niagara should prioritize municipal servicing and infrastructure for employment uses, including proactively providing servicing to vacant employment sites to make them more marketable.

- Employment development and redevelopment should be integrated within existing communities wherever possible and should blend with community character.

- Employment uses should be located with similar employment uses.

- Niagara's commuters have limited transportation options to get to work and would consider using an alternative means of travel, other than private vehicle, to get to work if it were reasonable and accessible.

- Niagara should encourage employers to promote transportation demand management practices and reduce surface parking spaces where possible.

- Employer needs, such as physical assets and building space, may shift as a result of the COVID-19 pandemic.

- Jobs that have transitioned to work-from-home jobs as a result of the COVID-19 pandemic may remain as such after the pandemic.

Growth Management Survey

The recent Amendment 1 to the Growth Plan resulted in the need for further feedback on key areas of the Growth Management Program from members of the public, local area municipalities, public agencies, and key stakeholders. One component of this was gathering input through the Growth Management Survey. A total of 217 participants responded to the survey and a total of 102 comments were received. Respondents were asked to rank key growth management and select preferred options between various growth management scenarios.

This item is covered in greater detail in a separate Report PDS 33-2020 (and the accompanying presentation) planned for December 9, 2020 Planning and Economic Development Committee.

Future Surveys

There will be other surveys conducted on major topic areas of the Official Plan. Regional Planning Staff have recently released a survey seeking feedback on the goals and objectives of the Niagara Watershed Plan project which is also being prepared in support of the Niagara Official Plan.

Report PDS 9-2020 was provided to Planning Committee in March 2020. This report summarized public consultation to date but also provided preliminary statements and key policy directives to acquire future public input on. Public input via a survey will be gathered on these statements in November/December 2020 so that Council can consider them as guidance in the finalization of key policy directives for the Niagara Official Plan.

Planning Advisory Committee

Planning staff gather input from an 8 member Planning Advisory Committee comprised of citizens with professional expertise in business, agriculture, environment, engineering and planning. The Committee last met virtually in September 2020 for updates and discussion on growth management, natural environment heritage and water system options as well as the then-planned PICs.

Stakeholder Engagement

Area Planners

Throughout September and early October, Regional Planning Staff met, individually, with all 12 local Planning Directors and Planning Staff to discuss growth management matters relating to land needs assessment and methodology, growth allocations, employment areas, settlement area boundary review and regional structure. These 12 one-on-one meetings also included an update and discussion on the Natural Environment Work Program including the identification and evaluation of natural heritage and water system options.

Stakeholder Groups

During the time that the virtual PICs were being undertaken, Regional staff were also undertaking the 2nd Point of Engagement for the Natural Environment Work Program which included: the PICs; virtual stakeholder workshops with the development, agricultural and environmental stakeholders; meetings with local planning staff; presentations to Provincial Planning Staff; presentation to the Planning Advisory Committee (PAC); presentation to the Agricultural Planning and Action Committee; presentation to the NPCA Board , PAC, and Staff; and Presentations to Niagara Escarpment Commission and Niagara Parks Commission staff. This results of this 2nd Point of Engagement will be presented to Council in January under a separate cover.

Regional planning staff have also discussed the growth management and natural environment work programs with the Niagara Homebuilders' group.

There was a presentation on the Niagara Official Plan and the natural heritage and water system options to Team Niagara representing the Economic Development Officers in the Region in November 2020.

Indigenous Consultation

Planning staff have twice met with Indigenous groups on the Niagara Official Plan. A sharing portal has been established to share background information on the Niagara Official Plan. Consultation with Indigenous Groups will continue on the expressed topic areas of interest.

Decision Making Bodies

In the first quarter of 2021, Regional Planning staff plan to organise online workshops with Regional Councillors and Planning Directors for each municipality to discuss growth management, natural environment and other areas of interest. This will provide an opportunity for decision-makers to have detailed discussion with staff on these matters.

To date, Planning staff have twice made presentations to local Councils on the Niagara Official Plan. In the second half of 2021, there will be a third round of presentations to local Councils on the Niagara Official Plan on Official Plan policy directions. Local municipalities are encouraged to inform their citizens to listen in on the presentations.

Official Plan Moving Forward

An Official Plan progress report is scheduled for January 2021. This report will outline how different sections of the Official Plan will be reported on going forward given the interrelationships of the sections of the Plan.

A key theme is the interrelated nature of the sections of the Regional Official Plan and managing growth. Managing growth is the challenge and opportunity to: recognize the heterogeneous communities in Niagara while accommodating the growth that is coming; create thriving complete resilient communities; assist in addressing affordable housing and aging in place; and protect our significant natural heritage and water systems.

Alternatives Reviewed

There are many approaches to consultation. The consultation strategy for the Niagara Official Plan is being done virtually because of the pandemic and is incorporating: topic specific, public sessions and public surveys; virtual workshops with stakeholders groups; Indigenous consultation; and virtual workshops with local and regional council members. Consultation has been and will continue to be a fluid process moving into the next stage of policy formulation stage.

Relationship to Council Strategic Priorities

Consultation on the Niagara Official Plan is an important process in supporting Council’s priority as a Sustainable Engaging Government. The Plan will address Council’s other priorities, being: Supporting Businesses and Economic Growth; Healthy and Vibrant Community; and Responsible Growth and Infrastructure Planning.

Other Pertinent Reports

PDS 1-2020 New Niagara Official Plan-Public Consultation Summary
PDS 33-2019 Growth Management Program Update for New Official Plan
PDS 9-2019 New Official Plan Consultation Timeline Framework
CWCD 421-2019 New Niagara Official Plan Updates

Prepared by:
Dave Heyworth
Official Plan Policy Consultant
Planning and Development Services

Recommended by:
Doug Giles, BES, MUP
Acting Commissioner
Planning and Development Services

Submitted by:
Ron Tripp, P.Eng.
Acting Chief Administrative Officer

This report was reviewed by Erik Acs, MCIP, RPP, Manager, Community Planning, and Isaiah Banach, Acting Director, Community and Long Range Planning.

Appendices

Appendix 1	Key Themes from Virtual PICs
Appendix 2	Submitted PIC Questions and Comments
Appendix 3	Employment Policy Survey Themes

Appendix 1 - Key Themes

Natural Heritage Systems Options-Key Themes

- Advocacy for the most protective options and that environmental protection be prioritized above other land-use planning objective of the Region and the new Official Plan.
- Request for clarification on the steps of the work program including why mapping at this stage of the work program only being conceptual and misconceptions regarding the identification of a preferred option. ;
- Concerns related to the prioritization of environmental protection versus developable urban land.
- The importance of addressing climate change and biodiversity loss
- Questions and comments on the goals and objectives of the Official Plan and Natural Environment Work Program as well as discussion on canopy, tree, and vegetative cover in the Region
- Questions related to who pays for environment impact studies and determines significance of features associated with development applications.
- Reinforcement for the protection of appropriate buffers and linkages
- Recommendation that tree planting and other private landowner stewardship polices be included in the new Official Plan

Water Resource System Options and Watershed Planning-Key Themes

- Concern over the implementation of policies for unmapped features and timing of when system mapping would be available.
- Requests to prevent ground water contamination by policies that regulate the types of development on highly vulnerable aquifers.
- The importance of integrating watershed planning and growth management was stressed from the perspectives of protecting water quality and natural features in the urban area and reducing sprawl.

Growth Management (Regional Structure, Land Needs, Growth Allocations, Settlement Area Boundary Review and Housing)-Key Themes

- Questions on the methodology for growth allocation
- How the environmental policy review and watershed planning will inform the growth management work.

- The relationship between targets and growth and whether growth can be halted if targets are exceeded.
- Concerns over protecting established neighbourhoods from intensification.
- Concern over urban expansions and how they are assessed through the preparation of the Niagara Official Plan
- Clarification on the definition of “affordable” housing and that planning for “age in place” includes providing housing for the older and younger age demographics.

Employment Lands, Urban Design, District and Secondary Plans-Key Themes

- Clarification on the role different employment areas serve.
- The suitability of brownfields relative to future employment or conversion to other uses.
- The role of heritage building in urban design.

Agricultural/Rural Lands, Mineral Aggregate Resources, Archaeology-Key Themes

- Questions on site specific issues on expected or submitted aggregate applications in Niagara Falls, Fonthill and Port Colborne.
- Questions around the administration of the Archaeological Management Plan.
- Clarification as to how development can take place on some agricultural lands and not on others.
- Clarification on the region’s approach to identifying prime agricultural areas.

Infrastructure-Water and Wastewater, Storm Water, Transportation-Key Themes

- The relationship between development charges and provision of infrastructure.
- Question regarding the use of low impact development standards for storm water management.
- Questions on transit route planning and the provision of housing along transit routes.
- Site specific questions pertaining to existing or planned treatment plants.
- Incorporating cycling in planning for streets and at a broader community level.

Appendix 2 - Submitted Webinar Questions and Comments

Wednesday, September 23, 2020

Natural Environment - Natural Heritage System
Submitted Questions
When you consider your recommendation, I would ask you to consider: Do you in your work and life, simply do what is the minimum so that you do as little as possible OR do you do what is right to do (3C) and work to have the best possible scenario, problem solving, and outcome, now and for the future?
why are we talking about cenceptual? is there a reason that the proposed mapping is not completed and not conceptual????
only conceptual?
Enhancement areas "MAYBE" used but these are not saved or mandated in 3B and can be ignored. Is that correct?
Without the linkages in place, you will have heat sinks and heat islands which will quickly make the natural areas dehydrate or swamp. Are you aware of what destruction has occurred in Oakville and other towns/cities when linkages within the natural water courses and natural vegetation areas was not considered or maintained?
How can you not map the required federal and provincial requirements with what you have now? Without that mapping of the current situation, there can be complete destruction and then is it "oh sorry' we made a mistake. You need to map what is there currently for any habitat including fish.
In the introduction of your technical report you note that this work is essential for the preservation of the Region's natural heritage and water resources. What I was not able to find is a stated goal/objective for the natural environment component of the new OP. What is the stated goal? I was also not able to find any performance criteria for the various options. So how will you evaluate if the policies are resulting in the desired outcomes for recommended options and shouldn't these performance criteria be included at this stage of evaluating options?
How does this planning relate to the current devlopment in many communities throughout the region?
Covid 19 has shown us how important natural areas are to our health and well-being. These natural areas need to be where people live. Which option, 3b or 3c, do you feel would best ensure that these natural areas are protected.
In the North South background paper there was some discussion about moving from the 30 per cent forest cover goal to 23 per cent. What was suggested was York Region. Since the goal is to accomplish more forest cover this seems to be defensible. However, I am going to suggest some additional safeguards. One is that plantations, should be considered part of forest cover. Another is that there be periodic reviews perhaps annually to determine if success is actually being made in Niagara in increasing forest cover.
Why not map fish habitat?
Why isn't fish habitat being mapped?
Enviornment Canada says that a minimum of 30% forest cover is required for human and environmental health, currently Niagara has only 17.5% coverage. How do we end up with each of the options? Please choose 3C, the other options are inadequate.
The background paper is opposed to specific policies for Short Hills Provincial Park. However, this could provide a means to link and expand the various natural areas outside the park. Could such policies be put into the plan to enhance other significant natural areas such as the Wainfleet Bog and Humberstone Marsh?

How would buffer sizes be determined? They often seem to be arbitrarily set
What priority will Linkages have within the Settlement Areas where there is an underlying designation (ie. residential) and proposed development, to ensure that there is no detrimental effect to the integrity of the complete NHS? Will the Region set the minimum buffer width that local municipalities must include or consider in their OP's for site specific applications?
Last night Mr. Norman mentioned that 3C was restrictive. Could you explain why and to whom was it restrictive.
How will you address the scope and scale of a proposal and studies. It seems that the “studies” could be differentiated. For example, a garage for 1 car is very different than a greenhouse.
Who determines what features in a woodlot are considered SIGNIFICANT and what else can be done to ensure that wooded land and wetlands don't change their designaiton based on a developers desires.
Further to Sean's first response, in consideration of balance across the Region from various perspective (Environmental, Social, Economic, etc.) have you considered how the options for 3A/B/C, will freeze lands more lands than are currently available for development and speed up the need for urban boundary expansions into the rural areas in several of the Region's municipalities?
Could polices be reviewed to require peer reviews of development applications that impact the Natural Heritage System? Right now having such reviews is at the discretion of the regional planning commissioner.
Where fish spawning areas are eliminated/disturbed by development, what possible measures may the developer be required to do.
how would these options impact the streams running through Niagara on the Lake e.g. One,Two and Three Mile Creek and also the historic Paradise grove Grove
When you say that climate change is being considered throughout the overall plan (mentioned with one of the very first slides that includes a pie chart) are you saying that the region’s current research and understanding on climate change (climate change discussion paper 2019) is a primary guiding principal? If so, why hasnt this been made clear on this slide in regards to all aspects of the plan?
Concerning enhancement areas in the map you showed as an example, enhancement areas largely occurred around the edges of woodlands. Wlould this not suggest that the buffers were not large enough to protect these natural areas. Therefore, why go for the minimum requirments for buffer? Make buffers manditory as suggested in 3C. Go for option 3C which are most protective of the natural areas.
If a developer is altering the tree canopy, is that same developer responsible for tree planting and restoration in the said subdivision?
Your consultant stated that this is the development of concepts. If that is true, why have you included preliminary preferred options in the Technical report that was presented to the PEDC/Council? It appears that you are narrowing the choices before you receive feedback/input from the consultation process.
The minimum buffer approach in agricultural areas could take agricultural land out of production. How will these competing interests be addressed?
Considering NHS and WRS as continuous systems, linkages are essential to analysis, protection and enhancement of features and must include settlement areas. I support 3C. Have other municipalities chosen an equivalent to 3C? Should Niagara not select the best option?
Have you confirmed that the Provincial Natural Heritage System mapping is correct? Will these be done?
Does this planning also take into consideration current pollution whether industrial, residential, agricultural - how to exacerbate / improve?
If climate change is the over arching concern shouldn’t a 30% canopy cover be a primary consideration?

Regarding the forest cover issues. Since agriculture plants also provide some of the environmental benefits of forest cover, how is Niagara's agriculture considered in assessing the required forest cover? Clearly there is substantial benefit to both air quality and wildlife species of having so much agriculture in the region, whether it is fruit trees or even vinyards.
Have the municipalities in the Region shown support toward any one of the Options and do they have any concern about losing money from development charges as this roles out and how that will impact tax payers?
Will the site specific studies be paid for by the developer? If so that introduces an extreme bias as reported in the Auditor Generals report on the NPCA. Do any of these options provide 100% protection for significant woodlands/wetlands/wildlife habitat/flooding mitigation?
How will cumulative effects be considered as proposals are assessed over time?
Is the goal of the NHS and WRS to provide the best protection for natural and water resources or to provide flexibility for developers?
In response to your comment tha Niagara should be exempt from striving for a 30% canopy because the cause is farming; Given that agriculture is important and it would take a fair bit of time that we really don't have to adjust how that is done to be more environmentally responsible, then doesn't it then make sense to limit all that housing deveolpment that is currently encroaching not only on green spaces but also on farm lands? The fact that farming is responsible for our low level canopy should not be used as the excuse, but should be seen as a challenge to be over come.
In the Technical report, under the evaluation criteria Ensure protection of the natural environment system, you state that Option 3C best ensures the protection of a region-wide N.H.S, including within settlement areas. If there is an option that ensures the best protection and provides a resilient and I would add healthy and sustainable natural environment why shouldn't we pursue that option (i.e Option 3c)?
In section 5.0 (page 53) of the technical report you identify preliminary preferred options based on the criteria noted on the prior pages. I assume the coloured circles are your recommendation for each specific evaluation criteria. Option 3C has 3 green circles and option 3B only has 2 and ¾, so can you help us understand the rationale for recommending Option 3B as a preliminary preferred option?
There is constant reference to promoting development in Urban Areas. However, we know that Urban areas are continuous areas, which include sensitive areas. Why is there an implication that the sensitive areas are open for development simply because they are zoned Urban?
Where can we find the provincial NHS mapping?
Reagarding Discussion Question #2: Why are we provided with two non-option options (1 and 2), two bare minimum options (3a and 3b) and only one substiantal option (3C)? Why are there not more options that do more than the bare minimum?
In the cover letter supporting the Technical Report, it states, "The preliminary preferred options are the recommendations of the Consultant team and are supported by the professional opinion of Regional Planning Staff. The preliminary preferred options still require the input of the public, stakeholders, and Indigenous groups." My question is – you have already recommended preliminary options, so what type of information/input might cause you to reevaluate your recommended preliminary options?

This is so that you have my verbal question in writing - thanks.
Going beyond minimum standards
Major question - How much tree planting will be involved?
Sub question to that - Will there be Carolinian Forest included in that?
Tree planting is an excellent way of helping climate change such as,
- a carbon sink - whether a small area or a large area,
- the mental health that greenery provides residents (regardless of who or where the resident is) - and particularly within settlement areas (trees reduce heat sinks, trees help drainage, etc),
- improves wildlife as well as bird, wildlife, & fish habitats,
- improves shorelines (whether rivers, lakes, etc) as well as wetlands
- improves maintenance within agricultural lands,
to name a couple.
Essentially, is there a tree planting program?

Submitted Comments

Your maps are not clear. growth areas are a line across the map, but not an enclosed area identified. It is not clear what the growth plan area is.

You say your goal is to set DIRECTION. Your technical report says "Option 3C best represents a FORWARD thinking SYSTEMS APPROACH ..." Why would you choose anything BUT the BEST, forward-directed Option (C)?

Sometimes an area used for recreation and/or active transport may not include keynatural heritage featuresand so not acquire planning protection. I would suggest that such areas should be added to the list

Given that the provincial standards are inadequate and constantly are being loosened in a time when the concerns and need for environmental action are increasing, how could any option other than 3c be a serious concideration? I see with my own eyes in Thorold the massive development taking place. For example, there is a proposal to develope 77.9 hectare parcel of land on the northside of Chippawa Parkway. I see development taking place on beverdams road which is in the middle of wetlands. When do we get to hear the take of the indigenous community. Our canopy is only 17.5%. We need to do better and that must take priority over development especially in green field spaces.

I believe there is an oversight in not recognizing the Province's Growth plan is significantly flawed. It's a one-size-fits-all approach that fails to recognize regional geography, and limitations. Niagara Region is a perfect example that crystallizes the Province's Growth plan's deficiencies. Geographically, we are an island, surrounded on three sides by Water, which constricts, and conflicts with our ability to grow responsibly, as it pertains to rapid real estate growth, and population growth. This puts enormous pressure on local Environment features, and is currently being realized in Niagara.

How do you mitigate Municipalities with independent agendas? Who have no climate plan, and who are willing to work to overrule PPS and best practices?

(apprently this format restricts the length of questions/comments, so I will continue after the cut-off)

I appreciate the amount of time and effort that has gone into this. But why are these the only options presented? From the perspective of Environmental Conservation during a Climate Crisis, and with all due respect, none of these options are optimal or acceptable. I humbly request that staff go back to the drawing board and present a plan that more effectively addresses the urgency, and imminent impact of climate change. I cannot stress enough, that first and foremost, this needs to be visualized through the lens of climate change with applicable sense of urgency. This must be the top priority to preserve what we all love about Niagara. We cannot blunder our way through this, as recent Developer Violations at Thundering Waters clearly demonstrate. The options currently being presented and recommended by staff are not the best options for the Environment. And the most protective options offered, are at best a weak compromise, if our Natural Heritage is to be properly protected for future generations.
Not just regarding fish habitat there is a lot of problem with lands which could be corrected through Significant Wildlife Habitat designations. Mapping of these lands right now is largely limted to deer wintering areas. It seems that a lot of work has to be done.
regarding forest cover the NPCA did a study which should a large area in agriculturally zoned lands which is actually reverting to forests naturally. I don't know what the actual percentage of the landscape this is. From looking at these maps it seems quite substantial. If this area was known the goal of 30 per cent might seem more realistic. These lands will likely become mature forests eventually if the agricultural designations are maitained and the land is not urbanized.
the city of Toronto has a very good approach and it posted on the website. Hamilton is working on a Biodiversity plan. can this approach be utilized!!
Bill 68 requires municipalities to demonstrate how they will maintain, protect and enhance the tree canopy and natural vegetation in the municipality. The option that best meets this (3C) should be strongly considered by the Region.
Please ensure that all questions and answers, and those that cannot be answered within the time allotted, are answered and posted on the Region's website with the PIC background documents for full transparency.
Thank you!
Regarding Peer review the current system on relying on provincial agencies has recently been weakened by the reduction in the commenting role of the Ministry of Natural Resources and Forestry. (MNRF) Also two letters by MNRF which were critical of environmental work by developer proponents in the case of Thundering Waters were never released to council or the public. I also received them with the help of the now disbanded Local Planning Review Support Center. This pattern would seem to show that a stronger provision in the regional plan needs to be added regarding peer review.
Regarding claims that protection of natural areas would create pressures to expand urban boundaries most of these lands are already protected to some degree and excluded from development potential. The exclusion of lands as enhancement areas would likely be limited in scale. The urban boundaries are quite large, especially because of the expansion in Fort Erie just south of Niagara Falls (Douglas Town) which came out of a judicial battle and has yet it seems to be recognized in urban boundary capacity.
Paradise Grove is a good example of a savannah habitat. These need to be recognized and protected in the official plan review. Right now protected ECA lands are all forests.

How do I get on this committee (committees)? You seem to not have a member-of-the-public (or members). Despite the importance of experts, the public probably needs to be involved here - not just at public meetings like today. My email is janetashleypollock@gmail.com
Great discussion. Thank you.
Thank you - a good & informative meeting.

Thursday, September 24, 2020

Natural Environment - Water Resource System
Submitted Questions
is modeling growth upwards in a livable style like Singapore has done being considered?
I'm a newcomer to Niagara. I'd like to know why we have development on top of highly sensitive aquifers and what impact that haves.
when are you be able to provide the full mapping on not only the watershed mapping and the natural heritage system ?How can one comment on this without the true facts?
also have you looked at what the coralation is between the growth numbers that have be put forth by the province and the impacts of those numbers to these proposals?
I am not sure why you are seeking input from the general public at this evidently very preliminary stage of the proceedings. After sitting through almost three of these presentations, I conclude that either I am not intelligent or that these sessions are not useful to the average lay person. I would need several introductory tutorial in order to begin to understand what you all have been saying. I feel you are talking mostly to yourselves though there may be other listeners who do understand you. I think that the presentations are extremely conceptual (as you acknowledge), highly abstract, consisting mostly of "motherhood" statements, while admitting that nothing definitive is being proposed. I get no idea of what is being proposed on the ground, area by area so that I can tell you what I feel about it. Basically, will you tell me you will stop the further destruction of Niagara's natural resources? Simplistic question???
Question: I guess I am not allowed to ask verbally on Zoom? Why is there no recognition of the need to PROTECT OUR AQUIFER in the South Coast of Niagara??? The need to protect human drinking water is paramount. Sorry Ron Schenckenberger, there is NO concern of developers to protect our AQUIFERS.
how to deal with past construction for example culverts etc. that have negatively affected the flow rate. This is definitely been the case at the 12 mile creek located in reach 8 the east tributary from Tremont Dr to Highway 406. This has casued accelerated errosion on the embankments near existing large apartment buildings putting over 300 or more tenants at risk. What will be done about this?
Why would we exclude settlement areas? - Arent those artificial boundaries for watershed planning as some of the features and indeed the impacts to the watershed extends into settlement areas.
Did I hear you correctly that WRS Option 2A will map floodplains outside of the settelement areas, but not with them?
As development continues, is it not important to require all subsequent development proposals to undergo cumulative impact assessments?
In terms of identifying and informing healthy aquatic and terrestrial ecosystems would various Marsh Amphibian/Bird Monitoring surveys; Breeding Bird Surveys which have been conducted for decades be of use?
What solutions are being put forward at the 12 mile creek that have been negatively affected of the water shed in the area and errosion of the embankments. Specifically Reah 8 of the east tributary from Tremont Dr and Highway 406 have been negatively affected by accelerated flow rates. This has been caused by culvert construction for example that have caused accelerated erosion that has put some apartment buildings at risk (over 300-400 tenants). The City and the Region is aware of these problems for last twenty (20) years.
How polluted are we?

My sense is that this is being done to increase the population in the Niagara Region. This is due ti people not being able to afford to live in the GTA. This means increase polution and traffic on our highways. This polution etc. impacts our water. This completion of this planning is a long way off - and developers are moving as fast as they can to develop areas that may be sensitive to our water. Will the province's desire to increase population in the Niagara region over take the common sense that should result from this work?
The NPCA Watershed report card shows surface water quality with a "D" rating. Furthermore, this has been rated "D" since at least 2012 - which WRS option 2A or 2B will provide the greatest improvement in water quality?
What is going to be done to deal with new commercial and residential developments that are being proposed that will have negative long term effect on the water tributaries? There are many examples of garbage and polution created by these devlopments but there has been no controls put in place to ensure our Niagara watercourse are maintained. What operational risk controls will be put in place to ensure there is no overdevelopment near the Niagara watercourses and flood plains. Also, will there be substantial penalties and enforcement put in place?
There was a substantial inventorying of natural areas, validated by field studies, called Nature for Niagara's Future - has this information been incorporated into your work?
There are streams that go through car wreckage yards in Niagara Falls and Fort Eire. Should not these streams be diverted from these areas to avoid future contamination?
It is excellent that the Region is taking a progressive stance with respect to meeting the policies outlined in the PPS 2017 for the Growth Plan and Greenbelt Plan. Thank you for acknowledging the NPCA and the RAP program as a valuable partner. Karst formations were mentioned an area of potential future study, as a hazard area will the NPCA be involved with this study? Will a copy of the slide presentations be available after the meeting?
Last evening you mentioned that Fish Habitat would not be mapped, but there would be some sort of policy protection. How can policies be implemented to protect something that isnt mapped?
There are a lot of Karst areas in Smithville within the area being proposed for expansion. Are these areas being excluded from potential development, since Karst can be pathways for contamination.
Considering the Niagara Region's past performance and failing grade. Why wouldn't the best choice be to protect our Natural Heritage and Water Resources be paramount?
What do you see as the major long-term differences - impact-wise - between Options 2A and 2B?
Submitted Comments
Can't hear - please get closer to mike!
Comment - not question: Ontario government has a watershed flow assessment tool - https://www.ontario.ca/page/watershed-flow-assessment-tool as does Brock University as does Ministry Northern Development and Mines, Ontario Geological Survey
Apologies, Karen, should have said, Brock University Earth Sciences

Sidestepping drinking water, wastewater management, etc & their infrastructure ... How good are our water resources in Niagara region? Will the following be considered? - as in recreation - fishing, swimming, shorelines/beaches, etc - as in flood control, water table - as in utilization by agriculture, industry, the Welland Canal, and urban developers - as in utilization by the indigenous population (hunting, fishing rights) - as in “how many exceptions?” - particularly ones that aren’t efficient or safe or climate-friendly and so on. It seems we haven’t had a good report card score for a long time - we’re pretty polluted. Really like the Goals & Objectives.
Reference material suggests that 2B is the better choice for water resources system for region-wide features because it includes settlement areas. It is essential to choose the best Option 2B which includes linkages in the settlement areas, appropriate for a continuous hydraulic/hydrologic WRS 2B provides better protection for small linkages and features in and out of settlement areas as well as buffers.
I am concerned about the orange coloured areas marked for watershed studies based on future urban expansions. This is the first time I have learned of any urban expansions being considered through this plan review. On a need basis there is no reason for any urban expansions since this is supposed to be calcuated on a regional basis. An attempt a few years ago to have an urban expansion in the Smithville area was rejected by the province since the rationale of a separate western need area was rejected by the province as a violation of both the Growth Plan and the PPS.
We NEED Niagarra Region to protect our drinking water. Without CLEAN drinking water there is no reason for jobs...
The one area that I see an urban expansion concern is the Douglastown area of Fort Erie. This is because this area was essentially imposed by the province through the courts. A watershed plan re urban growth would be a helpful form of damage control.
Please suggest possible responsible uses for exhausted aggregate quarries where quarrying has been done into an aquifer.
Not sure how to speak in this call?
I was also shocked to see urban expansion areas proposed for north west Niagara Falls. Urban needs could be served within the urban boundaries in the Chippawa area. This is one of the reasons that the region is going ahead with the new sewage treatment plant here, so that infrastructure capacity problems in south Niagara Falls do not stop growth on lands which are appropriately zoned.
There was no discusion of strategies to clean up ground water contamination. This is a serious problems. Such situations on lands such as the former General Motors site are a big barrier to needed intensification. Seeing clean up costs as part of a strategy to curb ground water pollution is an important way to get action on this problem
appreciated you bringing forth my questions , however i never recieved an answer or commitment of when the mapping would be availble. and to blame the provincial government is certainly a kop out!!!
I witnessed illegal dumping in Niagara Falls. This is known to the city council but nothing seems to be done about it. Could stopping such actions be part of a strategy to protect ground water.
I think that because contamination / pollution seems to be quite a concern, this portion of planning should address this issue. Please don't ignore your public.

Wednesday, October 7, 2020

Growth Management
Submitted Questions
How does the Region decide how much growth is allocated to any given municpality?
The planning is focusing on establshed communities. regions such as Wainfleet has no "established communities and based on your definitions will be excluded from the planning. West Lincoln also has minimal growth planned. Are these communities going to have support to maintain their infracstructure needs to allow the projected growth in the designated areas?
Are these current webinars available for future viewing?
will the reports to council in winter 2020/ 2021 confirm the amount of land needed for growth AND identify the locations where urban expansion is recommended?
thank you for an informative presentation, truly appreciate the detailed. Given how the focus is on creating complete communities, what is the region's plan on creating community benefit agreements with developers to ensure the communities where development happens receive the localized benefits they need specfically to their neighbourhood. Does the region have an official community benefit agreement policy as a strategy to include inclusive growth?
With regards to the housing growth needs versus employment land growth requirements, has it been taken into consideration that many residents coming to Niagara are retirees?
How is Specialty agriculture defined?
with 3 different mapping proopsals , what would be the change in settlement areas and numbers between all three mapping proposals and whe will we see full and concise mapping instead of what has been proposed.
I am curious about how the environmental policy review will inform the urban land needs study specifically? Can you provide more information on how the impacts of the proposed policy framework and policies will be quantified?
As Planners determine the vacant land inventoryj/parcels within their own municipalities, and that information is provided to the Region to assist in developing allocation targets and density (# of persons per household/etc) of those parcels, what role does the Council of the municipal have in this process and can a Council request reconsideration of the allocation given to it? As the allocations to municipalities are "minimum targets", does a municipality have any ability to slow or stop development if targets are achieved earlier than 2051? As required in Amendment 1 of the Growth Plan, how are market forces now a requirement in determining land needs methodology and allocations within municipalities?
At the Natural Heritage session there were a number of identified areas where urban boundary expansion are taking place. One was Smithville, which I noted could result in negative environmental impacts because of the presence of Karst formations. There were at least two other urban boundary expansions which were identified. Two of these were in western Niagara Falls. Could all the areas where these expansions are being considered be mapped be clearly identified tonight. Could it be clearly indicated how people can be involved in what I believe from the previous meeting the watershed planning excercies which are guiding these exercies.
secondary question is: what is the region's community engagement strategy in hearing resident voices from equity seeking communities: BIPOC, persons without homes, etc.
when is the urban boundary line will be finalized?

Following up on the question by John Bacher, does the Region not have the authority to defer ALL urban expansion considerations to a date after the finalization on the Official Plan? I believe it should have this authority and as such NOT permit any expansions before that date.
How will the Niagara Region expect to reach the goals outlined by the province - and how well will the Niagara Region meet the goals
that is population goals supported by bi-partisan
Even though the provoince is predicting our growth related to an aging popultion…….is there any thought, activity, strategy to adjust this prediction to have a more “complete community” that include the younger demographic.
Talk about using the currrent infrastructure efficientely: the main water supply pipe is on Vansickle road, and the Niagara Health St.Catharines Centre had built for many years. Is any growth plan around the West end of St.Catharines around the Hospital?
Niagara-on-the-Lake is a very special place and as such has in the past been given a target of 15% intensification over about 26 years . However over the last five+ years we have been told that this is a minimum number of units and therefore we have seen staff recommendations and Council approvals of lots close to sensitive natural areas and in the Old Town Established residential areas quite regularly. My question is how do we protect our built and natural areas from these types of development as required uner the heritage act and through provincial and regional and local environmental policies?.Gracia Janes
contaimination of brownfields is a major barrier to good planning. Could strategies be developed to address these problems including financial assistance from senior levels of government? In the past there was no serious effort to estimate brownfield capacity. While the 30 year planning effort normally encourages sprawl, if it is assumed that some time in this period brownfields will be cleaned up it would encourage better planning.
How will you / do you define 'affordable' with regards to housing. It is a relative term. , so how do you plan to define and
re-define as you move through the years, and across the various municipalities.
With respect to my question.... Well I presented these concerns to the regions over a DECADE ago!!!!! A lot of property owners have. What is the hold up with respect to getting some traction on this?
What are we DOING to keep these younger people here. Housing?? what about jobs strategy ??
Sorry i cant voice talk in. But, I would like to know how the Region of Niagara will allow building that is necessary to meet the provincial goals. We have to build
Can Mr.Giles explain the differance between HOUSING AFFORDABILILTY and AFORDABLE HOUSING one is subsidized and one isnt?
how will the region work with developers and builders to achieve housing affordibilty and remove roadblocks and delays that add to the cost of housiing. More affordibililty =less affordable housing!!!
Submitted Comments

When the Niagara Region in the past was determining if any urban boundary expansion in the past, it determined this on a region wide basis. It seems that now already it has been determined that certain municipalities based on their own needs will need expansion. This seems to be a negation of region based planning. It seems to preclude encouraging filling in urban boundaries in municipalities like Fort Erie and Port Colborne before any urban boundary expansion takes place in Niagara.
There is an area known as Douglas Town in Fort Erie, which I believe has a lot of land for potential urban expansion. This is because a court over ruled municipal efforts to restrict growth here. Since land owners appear to have a right already to develop here, it would appear that watershed studies are urgently needed to restrain it in an orderly way. This area could also be a good alternative to urban expansions which would permit new site alterations on farmland and natural habitats.
We feel the lower level tiers of municipal govt are being resisting development that is needed to meet affordable housing needs
Jobs is what matters!!
there are agressive needs, the province has dictated this
we have to meet the needs as dictated
only by box
this is a great need to meet the needs of the community
The Ontario Human Rights Commission has targeted NIMBY communities that refuse to allow 'undesirable' residents. This needs to change and we need to be inclusive
Thank you everyone. Excellent webinar.

Thursday, October 8, 2020

Employment Lands, Urban Design, District and Secondary Plans
Submitted Questions
It appears that heritage planning at regional level is moribund. Could concern with design, be a way to revitalize it?
The employment land map that showed three areas (Core plus two others). Could you explain how this was analyzed; are these are all employment areas? Or will some that were described as Innovation/Knowledge have more flexibility in uses (especially mixed use)?
With regards to employment land requirements, are the previously utilized (but now vacant and abandoned) buildings/lands being considered for future use rather than remain in their current state and develop new areas?
is it preferred different types of employment (e.g. technology based companies vs tradition) be kept separate and grouped together or have a mix of employment types in an area?
Submitted Comments
One way that urban design could be used is to protect histoic estate lots in Niagara on the Lake. Apart from heritage benefits these protect tree cover and the One Mile Creek. Regional guidelins could protect these areas in Niagara on the Lake, and perhaps similar areas in other pats of region where they exist.
I am from St. Catharines which still is governed by an obsolete 1965 transporation study. It would appear that design approach would be a way to make transporation less automotive centered by reducing street widths for example.
Thank you - short session tonight.

Tuesday, October 20, 2020

Rural and Agriculture, Mineral Aggregate Resources, Archaeology
Submitted Questions
How does the upcoming brown road proposal by walker in south end Niagara Falls fit with regional official plan. And will rehabilitation of winding down Taylor quarry be a likely requirement of approval of new quarry?
Regarding the Fonthill Kame, can you please outline how the new Official Plan will recognize and embed the Area of Natural and Scientific Interest (ANSI) for the Fonthill Kame?
What long term protection will the vulnerable aquifer thst stretches under Wainfleet, Port Colborne and Fort Erie from minineral aggregate operations
How will the Agricultural Policies impact lot creation?
Question in regards to AMP program. Which indigenous parties have being consulted in development of this plan as well are developers part of your consultation to gain their insight and recommendations.
In the presentation was it mentioned that the NR was using an agricultural consultant to help develop the official plan? If so, what firm or person is the consultant?
The new MNRF amendments have taken away the authority of local municipalities to restrict the depth of quarrying/pit excavation. However, the Municipalities still have the responsibility to protect the environment, including the groundwater/aquifers. Will the NOP recognize the difference between operations above, and below the groundwater table, i.e. recognizing that there are "dry pits" and "wet pits" and that they require different policies.
with respect to the archaeological mapping will there be a list of what types and age of artifact that will require designation
What role would the Region play in the process if archaeological features are discovered during construction? And will the archeological map be open to fine-tuning as time goes on?
How will the proposed AMP impact normal farm practices
I am so confused. Please explain the process of equitable application of the protection of prime agricultural area. We have prime tender fruit land at the bottom of the escarpment in Grimsby demolished for condensed housing, while useless clay land is being protected on top of the escarpment. We then see hamlets being allowed in some of the useless clay land area while other landowners, within the same area and with the same soil quality, being prohibited from land use change. This results in some taxpayer/landowners being disadvantaged financially without any clear equitable rationale.
Would you please give the E mail address for the panelists.
Has the Region considered completing a LEAR study, like other municipalities in the GGH have, instead of relying on the Provinces LEAR?
Does the Region consider Cannabis production to be an agricultural use? Will it allow zoning by-laws that conflict with the Farm and Food Production Protection Act?

Submitted Comments
Comment - really like that agriculture has been doing and will be doing diversity.

Wednesday, October 21, 2020

Infrastructure, Water and Wastewater, Stormwater, Transportation
Submitted Questions
If I understand the NOP goal (enviornmental protections) why doesn't the Region map aquafers in our rural areas - well systems are risk for groundwater contamination or removing protective covers in quarries in our rural communities
Will the aquifer used by rural residents in Wainfleet, Port Colborne and Fort Erie be identified as a drinking water source in the ammended ROP?
Mr.Lambert, the new waste water treatment plant proposal costing comes in at 345 million dollars can you let me know how the costs would be recovered for this ? I.E benifit to excisting and new growth I.E DC charges knowing that we are eliminating many pumping stations
Will the new Official Plan address the large increase in demand on water, effluent management and solid waste management created by the growth of the cannabis industry in the Region?
As far as quality of water being supplied to our homes, is that something that is handled by the individual municipalities, or is that something that falls under the Region?
Is there any water /wastewater servicing proposed for Wainfleet and is the capacity there for the build out of Rolling Meadows development in South Thorold?
thank you. Transit - does the plan support expansion of Regional transit routes? If so, what is the timing for expansion?
when the new waterwater treatment plant will start to function?
Why are there so many barriers to getting vegetative swales instead of conventional curbs and gutters? There is also a problem such in the old Town of Niagara on the Lake of these swales being converted to concrete curbs despite community opposition.
How could more progress be achieved in getting more roof gardens to reduce storm water runoff in Niagara. Some municipalities, notably Toronto has by-laws to encourage this. Could this be started in Niagara?
Can you share what the current impact our waste "sewage" water has on our lakes?
Can you explain how the development of the new OP will take into account the need to reduce carbon emissions in order to mitigate climate change?
How does the Regional plan promote housing options that allow for better public transit / active transportation?
Will Wainfleet be required to contribute to the cost of urban wastewater plans? There is no benefit to us!
Transit - does the plan support expansion of Regional transit routes? If so, what is the timing for expansion?
Does your mapping include the businesses that are licenced to take water, the amount allowed and if discharged, to where is it discharged and in what condition?
Parking lots are big generatiors of storm water. Could an effort be made to have some of this volume go into swales and other vegetative areas. Right now vegetative areas around parking lots do not receive water flow from them.
Are there plans to amalgamate the existing local transit operations with the current regional system and to establish a single transit service, similar to what has occurred in Durham and Waterloo for example?
Provincial policy restricts expansion of the water / sanitary network to certain situations - How often are these situations invoked to justify expansion? (e.g. Adjacent to settlement areas)

a biodiversity planning such as the City of Toronto can create needed habitats for storm water management in a natural way. riverine and buffers and stream edge and marshes, wetlands would help meet needed native habitats, will this be fully built in to the strategy????
Are there any current requirements for residential developers to include cycle and walking paths in their plans to make communities more sustainable?
How is the odor from waste water treatment plants monitored. Is there new technology to reduce the oder in the future?
Once the Official Plan has been finalized, is the language for directing each municipality 'shall', 'should', or a mix of both? (similar to what the region saw from the province)
Could the new sewage treatment plant in Niagara Falls have a forested buffer to reduce potential odour problems?
In Portland swales have been found to be complimentary to bicycle lanes. Could such an approach be developed in Niagara?
Has there been any talk from a regional level about removing/reducing parking minimums, or enforcing parking maximums, region wide? Is the region encouraging this?
how does the TMP corralate with the other parts of the OP considering we have no clear and concise mapping with regards to natural heritage areas and watershed mapping
Are local transit systems reassessing their schedules so a more reliable system is established to coincide with the increased schedules and investment of Regional Transit?
What is the process when a property in St Catharines has a change in the zoning and the property owner was not advised of this prior to the change? The property zoning had a negative effect on the value of the property and assessed value did not decrease. What should the property owner do to have this addressed and who should be contacted?
Is the Port Dalhousie water treatment plant going to be updated to handle the future increase in population due to the condomium growth in Port Dalhousie?
Is the cycling plan same as walking / hiking? Particularly (hopefully) if the routes are interconnected throughout the region.
What is the position of the group in regards to affordable rental development versus condominium development?
Is there a mechanism for community or organizations to make specific recommendations to the future OP?
Is the region considering any depaving innitiatives as a means of improving biodiversity, permeability, and even food security (through urban farming)?
Will the group allocate funds for site specific damages to properties caused by the water shed and man made solutions that had a negative effect on a property? Or at least perform research
Do you actually have a committe made up of public members that you consult with - talk out with?
How often do you hold these forums?
Is there a defined list of wast water projects for the region based on priority
Is this the first time I heard of a specific Growth Management session?
Submitted Comments
We are pleased that there are no plans to expand water/waste water system in Wainfleet . Have spent considerable money to keep our septic systems up to date and do not support having to pay for additional waster water infrastructure that is not needed
All of the documents that are being sent out to individuals should be posted for others to review

Hurray more forums!!! I appreciate all your work on this plan and allowing the community to have a voice.

Key Themes from Employment Policy Survey

- "Jobs", "Economic Diversity", and "Skilled Labour Workforce" are the most commonly prioritized employment themes, with "Jobs" being consistently ranked as the highest priority amongst all themes.
- Niagara is a good place for skilled labour jobs, but its employers do not offer competitive wages compared to employers in the GTHA.
- Niagara must do more to attract employers that require skilled labour jobs and offer competitive working wages.
- Niagara is a good area to locate a new business and has amenities and infrastructure that is attractive to employers.
- Niagara should harness its existing economic strengths, while diversifying its economy by attracting new employers and economic sectors that it is typically not known for.
- Niagara must proactively plan for short- and long-term employment needs, including strategically protecting lands outside of urban areas for future employment opportunities.
- If given the choice, people would rather work in Niagara than in the GTHA.
- People who live in Niagara did not move here for its unique employment or economy, as job opportunities in Niagara can be found elsewhere in the GTHA.
- Niagara should prioritize municipal servicing and infrastructure for employment uses, including proactively providing servicing to vacant employment sites to make them more marketable.
- Employment development and redevelopment should be integrated within existing communities wherever possible and should blend with community character.
- Employment uses should be located with similar employment uses.
- Niagara's commuters have limited transportation options to get to work and would consider using an alternative means of travel, other than private vehicle, to get to work, if it were reasonable and accessible.
- Niagara should encourage employers to promote transportation demand management practices and reduce surface parking spaces where possible.
- Employer needs, such as physical assets and building space, may shift as a result of the COVID-19 pandemic.
- Jobs that have transitioned to work-from-home jobs as a result of the COVID-19 pandemic may remain as such after the pandemic.