

Table 2: Niagara Region Staff Detailed Analysis and Comment on the Proposed 2024 Provincial Planning Statement (PPS)

Topic Area	Proposed Change / Integration	Niagara Region Staff Analysis/Response
Aggregates	The proposed PPS (2024) has not made significant changes to the aggregate resources section. References to rehabilitation in speciality crop areas have been removed – however rehabilitation in these areas would be directed by the Greenbelt Plan and Niagara Escarpment Plan where applicable. [Proposed policy 4.5]	Niagara Region staff note that the Growth Plan (2019) included a number of detailed and prescriptive policies related to aggregates resources – most of which were in regards to the interaction between aggregates and the Growth Plan Natural Heritage System as well as rehabilitation. It is the recommendation of Niagara Region staff that consideration be given to carrying forward the Growth Plan policies which required rehabilitation to consider natural features and functions in the proposed PPS (2024)
Agricultural Area Housing	In addition to a principal dwelling associated with an agricultural operation in prime agricultural areas, the proposed PPS (2024) permits up to two additional residential units as subordinate to the principal dwelling. [Proposed policy 4.3.2.5]	The Niagara Region Official Plan has a provincially-approved 0.4 ha size requirement for all lot creation in rural areas. This lot size reflects the area necessary to support on-site private water supply and long-term operation of a private sewage disposal system.

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		<p>Niagara Region staff are concerned the addition of 2 residential units on each parcel would require upgraded private servicing, which may not be possible on lots that were created for only a single residential unit.</p> <p>In addition, Niagara Region staff are concerned that proposed policy 4.3.2.5 refers broadly to “sewage and water services” being provided, whose definition includes “municipal sewage services and municipal water services”; especially coupled with the removal of policy wording that states the extension of partial services into rural areas is only permitted to address failed individual on-site sewage and individual on-site water services for existing development from proposed Section 3.6.</p> <p>It is recommended that a set of parameters or guidelines be developed to help planning authorities determine whether these uses “demonstrate that the use are compatible with, and would not hinder, surrounding agricultural operations” (Proposed Policy 4.3.2.5 b).</p>

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Agriculture	<p>The proposed PPS (2024) eliminates the requirement to use the provincially-mapped Agricultural System. Municipalities would now lead the designation of prime agricultural areas, including specialty crop areas. Using the provincial mapping remains an option. [Proposed policy 4.3.1]</p>	<p>Niagara Region staff note that an agricultural system approach based on provincial-mapping has historically been employed in Niagara’s regional official plan to designate lands based on priority for protection. After the release of the proposed agricultural system mapping by the Province (2018), Niagara Region through the Municipal Comprehensive Review (MCR) process, undertook extensive consultation to identify mapping refinement opportunities in the proposed land-base.</p> <p>Niagara Region staff believe the mapping approved through the Niagara Official Plan (2022) is accurate and best represents a continuous land base and systems approach. Staff support the continued use of the approved agriculture land-base mapping in Niagara.</p>
Agriculture	<p>The proposed PPS (2024) expands the definition of “on-farm diversified uses” to include all “land-extensive energy facilities”, such as ground-mounted solar or battery storage, whereas previously only ground-mounted solar facilities</p>	<p>OMAFRA’s <i>Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas</i> states that “on-farm diversified uses should be related to agriculture, supportive of agriculture or able to co-exist with agriculture without conflict”. Provided these uses are still subject to other criteria and</p>

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	<p>were identified. [Proposed definition of “on-farm diversified use”]</p>	<p>guidance for on-farm diversified uses (i.e. limited in area, secondary to the principal use, etc.), the expanded definition may align with Provincial and Regional policies that support the transition to net-zero communities.</p> <p>However, Niagara Region staff are concerned that given these uses are referred to as “land-extensive” it may mean they are meant to apply to more significant portions of a farm parcel.</p> <p>It is the recommendation of Niagara Region staff that the province consider whether “land-extensive” energy facilities are an appropriate land use in prime agricultural areas.</p>
<p>Built Boundary</p>	<p>The proposed PPS (2024) has not carried forward the concept of delineated built-up areas as a defined term previously contained in the Growth Plan.</p>	<p>The removal of the “built-up area” as a defined term and associated intensification rates may make it more difficult for municipalities to use tools and practices available to them to “support general intensification and redevelopment to support the achievement of complete communities” as outlined in Section 2.3.3.</p> <p>Similarly, the removal of a definition and policy set for “designated greenfield areas”, including associated density targets, will make it difficult for</p>

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		<p>municipalities to push for increased densities and housing options in the remaining undeveloped, but serviced, areas of the municipality.</p> <p>Additionally, if settlement area boundaries can expand at any time without the requirement for a land needs assessment to demonstrate the need for additional urban land, this will discourage intensification and encourage urban sprawl. This will create implications for providing fiscally responsible infrastructure.</p> <p>Niagara Region staff recommend that “built-up area” [as referenced in Policy 2.3.1.4] be a defined term, and that municipalities be required to establish and implemented targets for intensification and redevelopment (as opposed to being encouraged to do so).</p>
<p>Cultural Heritage and Archaeology</p>	<p>A number of definitions referenced in the Cultural Heritage and Archaeology section of the proposed PPS (2024) have been revised. [Proposed definition of “built heritage resource”, “conserved”, “cultural heritage landscape”, “heritage attributes”, “protected heritage property” and “site alteration”]</p>	<p>Many of the revisions are minor or provide additional clarification/protection for cultural heritage and archaeological resources. Niagara Region staff does not have concerns with the revisions to these definitions.</p>

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Cultural Heritage and Archaeology	The proposed PPS (2024) has also changed to policy term from “significant built heritage resource and significant cultural heritage landscape” to “protected heritage property” [Proposed policy 4.6.1]	Niagara Region staff are supportive of the proposed change in terminology and the new definition, which now includes archaeological resources.
Cultural Heritage and Archaeology	The proposed PPS (2024) includes revised policy language pertaining to engagement with indigenous communities, requiring that engagement occur early with an increased emphasis on consideration of their interests. [Proposed policy 4.6.5]	Niagara Region staff supports early engagement with indigenous communities. The emphasis on early engagement and specification in terms of the interests of indigenous communities included in the proposed PPS will be helpful from an implementation perspective.
Employment Areas	The proposed PPS (2024) changes the definition of “employment areas”. The focus of the definition is now on what would be considered traditional employment uses such as heavy industry, manufacturing, and large scale warehousing. [Proposed definition of “employment areas”]	<p>Niagara Region staff do not support the proposed change in definition as it will potentially hinder Niagara’s municipalities’ ability to achieve the employment forecasts set out to 2051, given that it will be difficult to protect the amount of land required to accommodate the number of jobs projected.</p> <p>The recently approved Niagara Official Plan includes different categories of employment areas. While the Region’s “Core Employment Area” designation may meet the revised definition,</p>

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		<p>“Dynamic Employment Area” and “Knowledge and Innovation Employment Areas” would not meet the revised definition. As such, the revised definition has the potential to remove approximately 2,175 hectares of employment area lands (45% of total employment area lands based on preliminary analysis), putting at risk the existing and jobs planned for these lands.</p> <p>It is the recommendation of Niagara Region staff that the definition of “employment areas” not be changed as it will limit the ability of municipalities to protect employment areas in the long-term.</p>
<p>Employment Areas</p>	<p>The proposed PPS (2024) includes a policy that would allow for a range of mixed land uses, including residential, in employment lands outside of employment areas [Proposed policy 2.8.1.3]</p>	<p>Niagara Region staff do not support this proposed policy.</p> <p>The Growth Plan and the Niagara Official Plan (4.2.5.1) both contain provisions to ensure that any proposed development of non-employment uses on employment land, outside of employment areas, shall retain space for a similar number of jobs on site.</p> <p>Niagara Region staff recommend that this policy not be included, and that the proposed PPS</p>

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		include greater protection for long-term employment uses.
Employment Land Conversions	<p>The proposed PPS (2024) allows planning authorities to remove lands from employment areas outside of a municipal comprehensive review provided certain tests are met. [Proposed policy 2.8.2.5]</p> <p>Currently, the PPS 2020 and Growth Plan only allow employment area conversions through a municipal comprehensive review. However, both documents also contain a notwithstanding provision that allows conversions prior to a municipal comprehensive review if certain criteria are met.</p> <p>However, the PPS (2024) proposes to revise certain conditions under which a conversion may be permitted. The PPS (2024) states that the municipality must have sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan, whereas the Growth Plan currently requires the municipality to accommodate projected employment growth to the horizon of the Growth Plan. The PPS (2024)</p>	<p>Niagara Region staff do not support this proposed policy change.</p> <p>Without the criteria to maintain sufficient employment lands to accommodate forecasted employment growth over time, it will be difficult to ensure that the employment forecasts set out can be achieved.</p> <p>Further, urban boundary expansions for employment areas occurred in the Region solely to accommodate forecasted employment growth. If these lands are converted and do not accommodate employment uses, further expansions will have to take place to provide sufficient space to accommodate forecasted employment.</p> <p>Considering employment area conversion requests comprehensively allows municipalities to examine all requests as part of one review to select the most appropriate areas for conversion. It also allows municipalities the ability to identify land needs in tandem with reviewing employment</p>

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	<p>also proposes to remove the requirement in the Growth Plan that the employment conversion does not impact the minimum intensification and density targets in the Growth Plan.</p>	<p>area requests to understand how potential employment area conversions will impact the need for settlement area expansions.</p> <p>Niagara Region staff recommend that the proposed PPS includes a policy framework for employment land conversions to be considered comprehensively and the Province instead carry forward Growth Plan policy 2.2.5.9 c) which provides long-term protection for employment uses.</p>
<p>Excess Soils</p>	<p>The proposed PPS (2024) removes policy 3.2.3 which directs planning authorities to support, where feasible excess soil management.</p> <p>The Growth Plan stated that municipal planning policies and relevant development proposals will incorporate best practices for soil management.</p>	<p>While municipalities can include policies addressing excess soil management, Niagara Region staff are concerned that the requirement for development proposals to incorporate best practices for excess soil management has been removed from provincial direction.</p>
<p>Growth Management</p>	<p>The proposed PPS (2024) - policy 2.1.5 references “where planning is conducted by an upper-tier municipality the land and unit supply maintained by the lower-tier shall be based on and reflect the allocation of population and units by the upper-tier” [Proposed policy 2.1 & policy 2.1.3.]</p>	<p>Inconsistent forecasts and/or methodologies to achieve such forecasts will impact the Region’s ability to plan for investments in infrastructure and the coordination of regional public services between local municipalities.</p>

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		<p>It is the recommendation of Niagara Region staff that all upper-tier municipalities still retain responsibility for growth management functions to ensure a coordinated approach across regional market areas.</p>
<p>Growth Management</p>	<p>The proposed PPS (2024) includes a policy to direct planning authorities to base employment and growth forecasts on the Ministry of Finance 25-year projections and allows for modifications as appropriate. [Proposed policy 2.1.1]</p> <p>Proposed section 2.1.2 allows municipalities to continue to forecast growth using population and employment forecasts previously issued by the province.</p>	<p>As an upper-tier municipality, the Niagara Region is responsible for planning, coordinating, and monitoring population and employment growth across the region.</p> <p>The Niagara Official Plan, 2022 set a 2051 population forecast of 694,000 people and 272,000 jobs. Through the Niagara Official Plan program, the Region was effective in pulling together various, and often inconsistent, data sources from lower-tier municipalities for the purpose of growth monitoring, forecasting and planning. These datasets continue to be collected by the Region and are critical to the planning and budgeting of capital infrastructure and community services.</p> <p>Region staff support replacing multiple/conflicting forecasts and projections with one projection. Niagara Region staff note Ministry of Finance</p>

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		<p>projections are, like Growth Plan forecasts, provided at the Niagara Region level. With 12 lower-tier municipalities within Niagara staff note this policy change does not contemplate how projections should be allocated between municipalities. Ministry of Finance projections are, furthermore, updated annually and can differ significantly from year-to-year complicating efforts in allocating projections between municipalities. It is the recommendation of Niagara Region staff that additional guidance regarding the distribution and timing of Ministry of Finance projections to lower-tier municipalities.</p> <p>Finally, Ministry of Finance uses the term ‘projections’ while other provincial data is referred to as ‘forecasts’. The draft PPS uses the term interchangeably. While it is understood that there is a difference between terms, it is recommended the Province clarify policy intent.</p>
Growth Management	The proposed PPS (2024) requires municipalities, when updating official plans, to have enough land designated for at least 20 years, but not more than 30 years, (a change from 25 years in the 2020 PPS) with planning expressly allowed to extend	Niagara Region staff have no concern with the proposed change in wording, however, with the repeal of the Growth Plan there will no longer be a consistent approach to completing land needs assessments, and therefore inconsistent

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	beyond this horizon for infrastructure, employment areas and strategic growth areas. [Proposed policy 2.1.3]	approaches to analysis and decision-making regarding land needs requirements.
Housing	The proposed PPS (2024) expands the definition of “housing options”, to specifically include more examples of “soft intensification” and broader housing arrangements and forms. [Proposed definition of “housing options”] .	<p>Niagara Region staff are not opposed to an expanded definition of “housing options”; however, the proposed definition may be beyond what is appropriate for a land use planning document.</p> <p>It is the recommendation of Niagara Region staff that the Province review the proposed definition to ensure it is appropriate and can be implemented through land use planning tool and policies.</p>
Intensification	The proposed PPS (2024) removes mandatory intensification and density targets for all municipalities. The Growth Plan required municipalities to meet specific intensification and density targets to accommodate forecasted growth. This requirement has not been carried forward, except for the density targets for MTSA’s in large and fast-growing municipalities. Instead, municipalities are encouraged to establish density targets “as appropriate, based on local conditions.” [Proposed policy 2.3.1.4] Large and fast-growing	Niagara Region staff are concerned with the proposed change. Not having a minimum intensification target or a “built-up area” at the Provincial level, combined with the ability to expand settlement area boundaries at any time, may discourage intensification and encourage sprawl. If sprawl is prioritized over intensification, it will become costly to extend and maintain servicing to greenfield areas, with existing

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	<p>municipalities are also encouraged, but not required, to plan for a minimum density target of 50 residents and jobs per gross hectare. [Proposed policy 2.3.1.5]</p>	<p>infrastructure not being optimized, and further impact any progress on climate change mitigation.</p> <p>It is the recommendation of Niagara Region staff that the province maintain minimum intensification and density targets with clear direction that municipalities may exceed the targets based on local conditions.</p>
<p>Land Use Compatibility</p>	<p>The proposed PPS (2024) removes requirement for proponents of sensitive land uses to demonstrate need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible. [Proposed policy 3.5.2]</p>	<p>Niagara staff recommend that the policy requirement for the proponent of sensitive land uses to demonstrate the need for the proposed use, and evaluate alternative locations, minimized and mitigation adverse effects be reinstated.</p>
<p>Large and Fast-Growing Municipalities</p>	<p>The proposed PPS (2024) introduces and identifies “large and fast-growing municipalities” (Niagara Falls and St. Catharines in Niagara) . [Proposed definition of “large and fast-growing municipalities” and Proposed Appendix – Schedule 1]</p> <p>“Large and fast-growing municipalities” are encouraged to plan for a minimum density target of 50 residents and jobs per hectare in designated growth areas. [Proposed policy 2.3.1.5]</p>	<p>Niagara Region staff support the identification and specific policies for “large and fast-growing municipalities”.</p> <p>Niagara Region staff would however recommend that in Policy 2.3.1.5. “large and fast-growing municipalities” be <u>required</u> to plan for a minimum density of 50 residents and jobs per hectare, as opposed to only being encouraged to do so.</p>

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Major Transit Station Areas	<p>The proposed PPS (2024) carries forward the concept of major transit station areas from the Growth Plan, with the definition and minimum density targets being generally the same.</p> <p>[Proposed definition of “major transit station area”]</p>	<p>Niagara Region staff support moving forward with the concept of major transit station areas (MTSA).</p> <p>It is noted that proposed policy 2.4.2.2 would result in a higher density target for the Niagara Falls and St. Catharines MTSA compared to what is been identified in the recently approved Niagara Official Plan, 2022 (i.e. an increase from 125 to 150 residents and jobs combined per hectare).</p>
Natural Heritage	<p>In comparison to the existing Provincial Policy Statement (2020), it appears that there are no changes to the natural heritage policies. Based on Niagara Region staff’s review several changes have been made to the associated natural heritage definitions. Firstly, the definition of “significant” as it applies to wetlands has been updated to reflect the revised process for identifying provincially significant wetlands which was introduced by the Province in late 2022. Secondly, “habitat of endangered species and threatened species” has been removed from the definition of “natural heritage features and areas”.</p>	<p>Niagara Region staff are not concerned with this change given that proposed policy 4.1.7 continues to prohibit development and site alteration in the habitat of endangered species and threatened species, except in accordance with provincial and federal requirements, and these habitats would continue to be protected through the Endangered Species Act.</p>

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<p>Natural Heritage</p>	<p>When the updated Growth Plan for the Greater Golden Horseshoe was released in 2017 and subsequently revised in 2019, it included policies, definitions, and mapping for a “Natural Heritage System for the Growth Plan” (Growth Plan NHS). Municipalities were required to incorporate and implement the policies and mapping into their official plans. The Growth Plan NHS was included as part of the integrated natural environment system (NES) of the Niagara Official Plan, approved by the Province in November 2022.</p> <p>As the proposed PPS (2024) will integrate the PPS (2020) and Growth Plan (2019), it is understood that there will no longer be a stand alone Growth Plan document, and is therefore understood the Growth Plan NHS would no longer be Provincial land-use policy.</p>	<p>Niagara Region staff are concerned with timing of elimination of the Growth Plan NHS. The process to develop a new Regional Official Plan was a significant multi-year work program that required a major investment by the community and Region. The natural environment work program – including conformity with the Growth Plan, and implementation of the Growth Plan NHS – was a significant aspect of the work program for the new Official Plan.</p> <p>Further, when Niagara Region staff implemented the Growth Plan NHS it was done so as part of an integrated natural environment system (NES), which also included the natural heritage system, water resource system, and greenbelt natural heritage system. The policies, linkages, and connections included as part of the Growth Plan NHS were relied upon to satisfy the PPS for an overall municipal natural heritage system.</p> <p>It is the recommendation of Niagara Region staff that the mapping and policies of the Growth Plan NHS continue to be provincial land-use policy and be implemented through Municipal official plans.</p>

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Phasing of Development	The proposed PPS (2024) introduces a new policy which would promote the development of phasing policies as appropriate. [Proposed policy 2.3.1.6]	Niagara Region staff are supportive of the proposed policy as it will encourage the orderly development of urban areas and support the efficient use of existing and planning infrastructure and public services.
Post Secondary Institutions	The proposed PPS (2024) introduces a new policy which would require planning authorities to collaborate with publicly-assisted post-secondary institutions regarding the planning for student housing [Proposed policy 6.2.5]	Niagara Region staff support the proposed policy which will help to ensure that there is a range of housing options near existing and planned post-secondary institutions in the Region.
Provincially significant employment zones	The proposed PPS (2024) has not carried forward Provincially Significant Employment Zones, which were introduced to the Growth Plan in 2019. Lands designated as PSEZ are protected from conversion to non-employment uses, except where demonstrated to be appropriate through a full municipal comprehensive review. The implementation document suggests alternative approaches to protect these lands, possibly through the use of minister’s zoning orders.	Niagara Region staff have no comments as there are no PSEZs in Niagara Region.
Schools	The proposed PPS (2024) acknowledges and encourages the use of non-traditional school	Niagara Region staff support the proposed policy.

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	locations where appropriate for the community. [Proposed policy 3.1.5]	
Settlement Area Expansion	The proposed PPS (2024) would allow for the creation of new settlement areas. Previously this was not permitted. [Proposed policy 2.3.2.2]	Niagara Region staff do not oppose this proposed change in principle. Similar to the above response related to settlement areas, it is recommended that the proposed PPS include a requirement to demonstrate need as well as other policy tests noted in proposed section 2.3.2.1 to ensure that Ontario communities are growing in a sustainable, efficient, and cost-effective way. The availability of capacity in servicing infrastructure at a point in time should not presume that an urban area expansion or creation is feasible or appropriate.
Settlement Area Expansions	The proposed PPS (2024) removes the requirement to demonstrate “need” for a settlement area expansion. [Proposed policy 2.3.2.1]	Niagara Region staff do not support the proposed change. The requirement to demonstrate need for an urban boundary expansion is a fundamental consideration in land use planning. The requirement to demonstrate need is an essential policy tool to encourage infill and intensification and to discourage sprawl. Infill and intensification

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		<p>will also assist with financial sustainability and planning for infrastructure.</p> <p>It is the recommendation of Niagara Region staff that “need” be included as a policy test for settlement area expansions in the proposed PPS (2023).</p>
<p>Settlement Area Expansions</p>	<p>The proposed PPS (2024) has not carried forward the concept of a municipal comprehensive reviews which was a cornerstone policy of the Growth Plan as a way to plan the expansion of settlement areas in an orderly fashion.</p> <p>The implication of this change is that municipalities may consider settlement area expansions at any time. There is no limitation on the ability of landowners to apply for an expansion. [Proposed policy 2.3.2.1]</p>	<p>Decades of poor planning in the mid-20th century demonstrated that there is a need for integrated and coordinated growth planning at the municipal-level.</p> <p>Niagara Region staff understand that there needs to be certain improvement to the planning system in Ontario to implement the provinces goal of 1.5 million new homes by 2031. However, Niagara Region staff do not agree that minimizing coordinated municipal growth management for short term gain, at long-term costs, is the appropriate solution.</p> <p>It is the recommendation of Niagara Region staff that a mechanism similar to MCRs be maintained to ensure that municipalities grow in an integrated and coordinated manner.</p>

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Sewage and Water Services	The proposed PPS (2024) introduces a new policy which would allow the allocation and reallocation of unused capacity in the water and wastewater system to support current and projected housing needs. [Proposed policy 3.6.1 d)]	Niagara Region staff are supportive of the proposed policy as it will provide an additional tool to support municipalities ensuring that approved development is built and allow the reallocation of servicing capacity from approved developments which are not moving forward.
Strategic Growth Areas	The proposed PPS (2024) has carried forward / integrated the concept of strategic growth areas from the Growth Plan. They are to be identified in official plans, and should be the focus of growth. They include major transit station areas. [Proposed section 2.4 and proposed definition of “strategic growth area”]	Niagara Region staff are supportive of strategic growth areas continuing to be part of the planning framework in Ontario.
Watershed Planning	The proposed PPS (2024) has no carried forward the full suite of policies related to watershed and subwatershed planning to inform land use planning as compared to the existing PPS (2020) and Growth Plan (2019). Large and Fast Growing Municipalities are required to undertake watershed planning and other municipalities are encouraged to do so [Proposed policy 2.2.4]	The proposed changes will limit the applicability of watershed planning, and as such will result in negative impacts to the natural environment and the ability to work towards a streamlined system that achieves complete communities. By limiting the municipalities and scope at which watershed planning is undertaken the proposed PPS (2024) does not take into consideration that

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	Municipalities undertaking watershed planning are encouraged to collaborate with applicable conservation authorities [Proposed policy 4.2.5]	watersheds are not limited by municipality boundaries.