 Corporate Services Department Legislative Services Division	
Date & Time Received:	September 17, 2025 12:06 pm
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Notes/Comments:	

September 17, 2025

SEE DISTRIBUTION LIST

RE: SUMMARY OF 2024-2025 TRCA POLICY CONSULTATION SUBMISSIONS

Toronto and Region Conservation Authority's (TRCA) Board of Directors is pleased to have endorsed the [Report on the Summary of 2024-2025 TRCA Policy Consultation Submissions](#) at its meeting on June 27, 2025 adopting Resolution A#91/25 as follows:

WHEREAS in 2024 and to date in 2025, TRCA submitted letter responses to senior level governments on several legislative, regulatory and policy consultation initiatives relevant to TRCA programs and services;

THEREFORE, LET IT BE RESOLVED THAT the TRCA staff report on a summary of TRCA policy consultation submissions since the last summary report (2023-2024), from August 2024 through to May 2025, be received;


AND FURTHER THAT the Clerk & Manager, Policy, so advise municipal partners and Conservation Ontario.

The report provides a summary of TRCA submissions on federal and provincial legislative, regulatory, or policy initiatives relevant to TRCA interests from August 2024 to May 2025, for the information of TRCA Board of Directors.

A copy of the report and appendices are enclosed for your convenience. If you have any questions or require additional information, please contact Mary-Ann Burns,

Senior Manager, Planning Policy and Regulation at maryann.burns@trca.ca or (437) 880-2299.

Sincerely,



Joanne Hyde
Clerk and Manager, Policy

- cc. John MacKenzie, Chief Executive Officer, TRCA
Laurie Nelson, Director, Policy Planning, TRCA
Mary-Ann Burns, Senior Manager, Planning Policy and Regulation, TRCA
Heather Rodriguez, Planner, Planning Policy and Regulation, TRCA
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Section III – Items for the Information of the Board

TO: Chair and Members of the Board of Directors
Friday, June 27, 2025 Meeting

FROM: Laurie Nelson, Director, Policy Planning

**RE: SUMMARY OF 2024-2025 TRCA POLICY CONSULTATION
SUBMISSIONS**

KEY ISSUE

Summary of Toronto and Region Conservation Authority (TRCA) submissions on federal and provincial legislative, regulatory, or policy initiatives relevant to TRCA interests from August 2024 to May 2025, for the information of TRCA Board of Directors.

RECOMMENDATION:

WHEREAS in 2024 and to date in 2025, TRCA submitted letter responses to senior level governments on several legislative, regulatory and policy consultation initiatives relevant to TRCA programs and services;

THEREFORE, LET IT BE RESOLVED THAT the TRCA staff report on a summary of TRCA policy consultation submissions since the last summary report (2023-2024), from August 2024 through to May 2025, be received;

AND FURTHER THAT the Clerk & Manager, Policy, so advise municipal partners and Conservation Ontario.

BACKGROUND

From time to time, the Province of Ontario, and the Government of Canada release legislative, regulatory, policy or guideline proposals of interest to TRCA, the majority of which are provincial and are posted on the Environmental Registry of Ontario (ERO). The Planning Policy and Regulation Business Unit within the TRCA Policy Planning Division is primarily responsible for leading internal reviews of government proposals on a range of matters relevant to TRCA interests.

TRCA staff coordinate internal circulations of government materials and draft submissions based on staff input that integrates the expertise and

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inter-disciplinary perspectives of TRCA's teams. Comments and recommendations are informed by the successes and challenges staff experience in their day-to-day work with municipalities, proponents, and other stakeholders, with emphasis on shared provincial, municipal and TRCA objectives.

All TRCA federal or provincial policy submissions are vetted through senior staff, approved, and signed by the Chief Executive Officer, or designate, who is typically the Director of Policy Planning, prior to submission to ensure alignment with TRCA's Strategic Plan pillars and outcomes.

Policy Consultation Topics

ERO postings responded to in August 2024 to May 2025 predominantly focused on proposals to amend legislation, regulations, and policies to streamline government functions with the intent of expediting approvals for development and infrastructure. The two federal postings within this time period were submission responses regarding water resources and biodiversity related policies. TRCA responded to these postings to advocate for the proposed legislative frameworks and natural resource strategies to maintain best environmental practice for implementing plans and projects that create safe and resilient communities in the context of our watershed jurisdiction.

RATIONALE

The outcomes of senior government initiatives can have implications on TRCA's day-to-day work in multiple roles as a resource management agency, a regulator, a public commenting body representing the provincial interest for natural hazards, and as a landowner and proponent of conservation land projects. Therefore, it is important for TRCA to provide input on government proposals and to advocate for its position as articulated in its submissions to encourage alignment with and support for TRCA and municipal partner objectives and interests.

The policy work undertaken to respond to consultations is also important for strengthening relationships and coordination between TRCA and partners. Provincial proposals of late have been commonly based on the themes of streamlining reviews and approvals and finding efficiencies to stimulate and expedite major plans and projects. It is vital for TRCA to highlight its expertise, experience and shared objectives and issues, to demonstrate TRCA's valuable role in collaborating with its partners to achieve efficiencies and effectiveness that supports environmentally

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responsible and sustainable community building in a timely manner. Accordingly, federal, provincial, and municipal staff, as well as Conservation Ontario, sometimes reach out to TRCA for information and advice, in recognition of TRCA's broad expertise in watershed and ecosystem science, on-the-ground experience in development and infrastructure review, flood and erosion remediation, and ecosystem restoration in time sensitive and high-profile approval processes.

Chronological List of Postings and TRCA Responses

Due to the volume and limited timeline of policy consultations (generally 30 days for ERO postings), it is challenging to bring TRCA submissions to the Board of Directors or Executive Committee prior to their submission. In some instances, the comment period for ERO postings is concurrent with legislative approval processes so that comments are submitted at the same time a Bill is becoming law. Despite this timing, it is important for TRCA to document any issues or concerns for the public record and for the reference of federal and provincial staff who may be working on subsequent related initiatives such as implementing regulations or guidelines.

Recognizing that Board Members may have an interest in TRCA's submissions that are not brought to the Board, **Table 1** below contains a list of provincial and federal policy consultations from August 28, 2024 to December 31, 2024 for which TRCA completed and submitted responses, with status of decisions noted. Copies of TRCA letter responses from 2024 are available to Board members upon request.

Table 1 – August 28, 2024 – December 31, 2025 TRCA Submissions to Government Policy Consultations

Posting	Proposal Summary	Submission Date
Expanding Protected Areas in Ontario - Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006	The Ministry of the Environment, Conservation and Parks is proposing to expand its protected area system by increasing the size of a number of provincial parks and conservation reserves under the Provincial Parks and Conservation Reserves Act, 2006. Decision Summary: Ongoing, proposal under review.	August 28, 2024

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Posting	Proposal Summary	Submission Date
Link: https://ero.ontario.ca/notice/019-8618		
(FEDERAL CONSULTATION) National Freshwater Data Strategy Link: https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/national-freshwater-data-strategy.html	<p>The Canada Water Agency is leading the development of the National Freshwater Data Strategy in collaboration with partners and stakeholders. The Strategy will establish guidelines and principles for how freshwater information should be organized, stored, and shared in Canada. Once implemented, the Strategy will make it easier for Canadians to find and access freshwater data, as well as use and combine data from various sources.</p> <p>Decision Summary: Ongoing, strategy under review.</p>	September 13, 2024
Advanced Wood Construction Action Plan Link: https://ero.ontario.ca/notice/019-8268	<p>The Advanced Wood Construction Action Plan aims to increase the use of wood in construction and therefore drive economic prosperity, bolster housing supply, and help to mitigate climate change.</p> <p>While aspects of the plan have been updated in response to input received during consultation and engagement processes, the plan's main objectives have remained from the draft version published.</p> <p>Decision Summary: The Advanced Wood Construction Action Plan was revised and approved following a review of comments and feedback received through the ERO.</p>	September 30, 2024

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Posting	Proposal Summary	Submission Date
<p>Proposed amendment to O.Reg 299-19 ARUs - made under the Planning Act</p> <p>Link: https://ero.ontario.ca/notice/019-9210</p>	<p>Ontario Regulation 299/19: Additional Residential Units (O. Reg. 299/19) was amended to align municipal zoning by-laws in support of the building of additional residential units, such as basement suites and garden suites. The amendments remove or update requirements relevant to angular planes, maximum lot coverage, floor space index (FSI), minimum lot size, and minimum building distance separation for parcels of urban residential land. These changes could reduce or eliminate the need for rezoning or minor variances, saving time and money and helping to build more homes.</p> <p>Decision Summary: Changes have been made to Ontario Regulation 299/19: Additional Residential Units to facilitate the creation of additional residential units by removing barriers that would reduce or eliminate the need for rezoning or minor variances in certain cases.</p>	<p>October 23, 2024</p>
<p>Proposed regulatory amendments to streamline the approvals process for alterations to municipally owned sewage and water distribution works that are part of transit projects</p>	<p>The Ministry of the Environment, Conservation and Parks proposed amendments to O.Reg. 208/19 and O.Reg. 172/03 that would allow Metrolinx and other transit authorities to make changes to municipal sewage or water distribution works that are part of transit projects more easily. This would help deliver critical transportation infrastructure faster while maintaining environmental safeguards.</p> <p>Decision Summary: The Ministry of the Environment, Conservation and Parks is moving forward</p>	<p>November 11, 2024</p>

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Posting	Proposal Summary	Submission Date
Link: https://ero.ontario.ca/notice/019-8728	with regulatory amendments to enable Metrolinx and other transit authorities to make changes to sewage and water works more easily, helping to deliver transit projects faster while maintaining environmental oversight.	
Enabling greater beneficial reuse of excess soil Link: https://ero.ontario.ca/notice/019-9196	<p>The Ministry of the Environment, Conservation and Parks proposed updates to the Excess Soil Regulation to change the in-effect date of a provision preventing the landfilling of cleaner soil by two years and to clarify the exemptions to this provision. These changes provide more time for industry to learn about and prepare for this provision and respond to concerns that current lack of awareness could result in project delays and illegal soil dumping.</p> <p>Decision Summary:</p> <p>Amendments were made to Ontario Regulation 406/19 to change the in-effect date of a provision to restrict landfilling of cleaner excess soil, from January 1, 2025, to January 1, 2027. Clarifications to existing exemptions from this restriction were made as well. Other proposals remain under consideration.</p>	November 18, 2024
Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 – Building Highways Faster Act, 2024, Bill 212 - Highway 413 Act, Bill 212 - Reducing Gridlock, Saving	<p>The Ministry of Transportation (MTO) is proposing a new act under Bill 212 Reducing Gridlock, Saving You Time Act, 2024 called Building Highways Faster Act, 2024 (BHFA) to accelerate highway construction for designated priority projects. If passed, the BHFA would override most municipal by-laws that might prevent or</p>	November 20, 2024

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Posting	Proposal Summary	Submission Date
<p>You Time Act, 2024 – Building Highways Faster Act, 2024</p> <p>Links: https://ero.ontario.ca/notice/019-9265 https://ero.ontario.ca/notice/019-9266 https://ero.ontario.ca/notice/019-9213</p>	<p>restrict the delivery of goods or services to the priority highway project.</p> <p>MTO has also proposed a framework that would enable provincial approval for new bike lanes on municipal roads requiring removal of a traffic lane and for existing ones, where a traffic lane was removed; it also provides for the removal of the bike lanes on Bloor St., Yonge St., and University Ave. in the City of Toronto and to return them to a lane of traffic.</p> <p>Through the proposed Reducing Gridlock, Saving You Time Act, the Ministry of the Environment, Conservation and Parks is proposing the Highway 413 Act, which, if passed, will:</p> <ol style="list-style-type: none"> 1. Exempt activities for Highway 413 from the Environmental Assessment Act 2. Create a process for assessing and reporting on the environmental impacts and mitigation of constructing Highway 413. <p>Decision Summary:</p> <p>The Ministry of Transportation passed Bill 212 which introduces the new Building Highways Faster Act, 2024, an initiative under the Reducing Gridlock, Saving You Time Act, 2024. This new Act will accelerate highway construction for designated priority projects to support the movement of goods and people across Ontario.</p>	

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Policy consultations from January 1, 2025 to May 31, 2025 for which TRCA completed and submitted responses, with status of decisions noted are listed below in **Table 2**.

Copies of these more recent TRCA letter responses are attached to this report and are numbered and referenced accordingly.

Table 2 – January 1, 2025 – May 31, 2025 TRCA Submissions to Government Policy Consultations

Posting	Proposal Summary	Submission Date
<p>Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements</p> <p>Link: https://ero.ontario.ca/notice/019-9453</p>	<p>The Ministry of Transportation & Ministry of Energy and Electrification are seeking public consultation on the Focused Analysis Area (FAA), related to the Highway 413 project, and Narrowed Area of Interest (NAI), related to the Northwest GTA Transmission Corridor. The proposal notice was updated on January 2, 2025, to advise the public that a revised NAI map that now correctly identifies the cities of Toronto and Vaughan was attached to the posting.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	<p>January 6, 2025</p> <p>Refer to Attachment 1</p>

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Posting	Proposal Summary	Submission Date
<p>Enabling the Development of Commercial-Scale Geologic Carbon Storage in Ontario: The Geologic Carbon Storage Act Link: https://ero.ontario.ca/notice/019-9299</p>	<p>The Ministry of Natural Resources was seeking feedback on a proposed Act that would enable the regulation of commercial-scale geologic carbon storage in Ontario.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	<p>January 9, 2020</p> <p>Refer to Attachment 2</p>
<p>2016-2020 Cumulative Impact Assessment under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement Link: https://ero.ontario.ca/notice/019-9455</p>	<p>The Ministry of the Environment, Conservation and Parks is seeking public input on what actions Ontario should take, if any, in response to the results of the "Cumulative Impact Assessment of Withdrawals, Consumptive Uses and Diversions: 2016-2020" conducted under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	<p>January 17, 2025</p> <p>Refer to Attachment 3</p>
<p>Developing government response statements for four species of risk under the endangered species act Link: https://ero.ontario.ca/notice/019-9257</p>	<p>The Ministry of the Environment, Conservation and Parks proposed government response statements (species-specific policies) that outline actions the government will take and support to protect and recover three species at risk</p>	<p>January 20, 2025</p> <p>Refer to Attachment 4</p>

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Posting	Proposal Summary	Submission Date
	<p>in Ontario. The species are Chimney Swift, Davis's Shieldback and Lesser Yellowlegs.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	
<p>Bill 238, Emergency Management Modernization Act, 2024: Proposed amendments to the Emergency Management and Civil Protection Act</p> <p>Link: https://ero.ontario.ca/notice/019-9467</p>	<p>As part of the Emergency Management Modernization Act, 2024 the Treasury Board Secretariat is proposing legislative amendments to the Emergency Management and Civil Protection Act to strengthen provincial leadership and coordination of emergency management and support enhanced community emergency management capacity.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	<p>January 22, 2025</p> <p>Refer to Attachment 5</p>
<p>Uxbridge Urban Provincial Park Preliminary Management Plan</p> <p>Link: https://ero.ontario.ca/notice/019-9209</p>	<p>Following the establishment of Uxbridge Urban Provincial Park on July 1, 2024, The Ministry of the Environment, Conservation and Parks prepared a preliminary park management plan that outlines the policies to guide the park's long-term protection, development and management.</p>	<p>January 23, 2025</p> <p>Refer to Attachment 6</p>

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Posting	Proposal Summary	Submission Date
	Decision Summary: Ongoing, proposal under review.	
(FEDERAL CONSULTATION) Comments on Canada's 7th National Report to the Convention on Biological Diversity	<p>Environment and Climate Change Canada (ECCC) requested TRCA input since TRCA previously provided comments on the development of Canada's 2030 Nature Strategy, released in June 2024. Under the 2025 request, ECCC was seeking information on efforts to conserve and sustainably use biodiversity in the form of responses to three sets of target-based questions. The targets are from Annex 1 of the Nature Strategy. This information was to be used to inform the drafting of the 7th National Report to the Convention on Biological Diversity (2020 to 2025) and could appear as vignettes highlighting effective actions.</p> <p>Decision Summary: Ongoing, report under development.</p>	<p>March 31, 2025</p> <p>Refer to Attachment 7</p>
<p>Special Economic Zones Act, 2025 Link: https://ero.ontario.ca/notice/025-0391</p>	<p>The Ministry of Economic Development, Job Creation and Trade is proposing a new law called the Special Economic Zones Act, 2025. If it gets approved, the Ontario government will be able to</p>	<p>May 16, 2025</p> <p>Refer to Attachment 8</p>

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Posting	Proposal Summary	Submission Date
	<p>designate special areas that are critical to Ontario's economy and security, where selected projects could move faster as a result of simplified rules, faster approvals, and one-window access to services.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	
<p>Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025 Link: https://ero.ontario.ca/notice/025-0380</p>	<p>The Ministry of the Environment, Conservation and Parks is proposing a new approach to the protection and conservation of species at risk. The ministry believes the current approach and practices are too complicated, takes too long to complete, and causes unnecessary delays and costs for housing, transit, and critical infrastructure.</p> <p>Decision Summary: Ongoing, proposal under review.</p>	<p>May 16, 2025</p> <p>Refer to Attachment 9</p>
<p>Proposed Amendments to the Ontario Heritage Act, Schedule 7 of the Protect Ontario by Unleashing our Economy Act, 2025 Link: https://ero.ontario.ca/notice/025-0418</p>	<p>The Ministry of Citizenship and Multiculturalism is proposing to make legislative amendments to the Ontario Heritage Act to provide new and modified tools to improve enforcement and compliance and allow for exemptions to</p>	<p>May 16, 2025</p> <p>Refer to Attachment 10</p>

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Posting	Proposal Summary	Submission Date
	archaeological requirements where it could potentially advance a provincial priority. Decision Summary: Ongoing, proposal under review.	

Also provided for the information of the Board are the following summaries of select provincial legislative and policy initiatives and TRCA submissions from the above.

2016-2020 Cumulative Impact Assessment under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement (ERO 019-9455)

The Ministry of Environment, Conservation and Parks (MECP) was seeking input on the actions Ontario should take in response to the 2016-2020 Cumulative Impact Assessment of Withdrawals, Consumptive Uses and Diversions (the Impact Assessment) and the content of those regulations.

TRCA staff offered comments and recommendations regarding what may be data gaps, that once addressed, could provide a better indication of issues to be addressed through future regulations. These focused on the hydrological effects of consumption uses and diversions, consideration of uncertainty, groundwater input and intra-basin diversions. The recommendations included exploring changes at the national and/or binational level since this might be more effective than Ontario-focused regulation. Similarly, TRCA's comments also recommended using basin-wide climate projection models to understand trends in the Great Lake water budget components, including the impact of groundwater inputs.

Canada's 7th National Report to the Convention on Biological Diversity (FEDERAL CONSULTATION)

Environment and Climate Change Canada (ECCC) requested TRCA's input since we previously provided comments on the development of Canada's 2030 Nature Strategy, released in June 2024. As we understand it, the information TRCA provided would be used to inform the drafting of the 7th National Report to the Convention on Biological Diversity (2020 to 2025), and may appear as vignettes highlighting effective actions.

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ECCC was seeking information on efforts to conserve and sustainably use biodiversity by asking three sets of target-based questions: 1) what actions we have undertaken that have been particularly effective, 2) what the biggest challenges were, and 3) future approaches we may explore.

TRCA listed a wide array of actions our organization took to effect change, from collaborative watershed planning projects which included future climate projections and risk and vulnerability assessments, in addition to large scale, long-term inventory and monitoring of terrestrial and aquatic ecosystems. The greatest challenge we identified was lack of sustainable long-term funding for research and implementation of science-based tools. Areas to explore in the future focused on increased collaboration to leverage additional resources.

Relationship to TRCA's 2023-2034 Strategic Plan

This report supports the following Pillars and Outcomes set forth in TRCA's 2023-2034 Strategic Plan:

Pillar 1 Environmental Protection and Hazard Management:

- 1.1 Deliver provincially mandated services pertaining to flood and erosion hazards

Pillar 1 Environmental Protection and Hazard Management:

- 1.3 Maintain healthy and resilient watershed ecosystems in the face of a changing climate

Pillar 2 Knowledge Economy:

- 2.3 Advocacy and adaptability in the face of policy pressures

Pillar 2 Knowledge Economy:

- 2.4 Integrate environmental considerations and science into decision making

FINANCIAL DETAILS

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

DETAILS OF WORK TO BE DONE

TRCA staff will continue to monitor federal policy consultations, the Environmental Registry of Ontario, the Regulatory Registry of Ontario, the

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Ontario Legislative Assembly website, and the Province of Ontario News' Website to ensure TRCA is aware of, and where appropriate, participates and comments on legislative, regulatory, policy and technical guidance initiatives affecting TRCA interests.

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

Report prepared by: Heather Rodriguez, Planner, Planning Policy and Regulation, Mary-Ann Burns, Senior Manager, Planning Policy and Regulation

Emails: heather.rodriguez@trca.ca, maryann.burns@trca.ca

For Information contact: Mary-Ann Burns, (416) 880-2299

Email: maryann.burns@trca.ca

Date: June 5, 2025

Attachments: 10

Attachment 1: TRCA-Correspondence-MTO_413-FAA-and-Northwest-GTATC-NAI-ERO-019-9453_Final

Attachment 2: TRCA-Correspondence-MNR-Commercial-Scale-Geological-Carbon-Storage-ERO-019-9299_Final

Attachment 3: TRCA-Correspondence-MECP-ERO-019-9455

Attachment 4: TRCA-Correspondence-MECP-Species-at-Risk-Under-Endangered-Species-Act-ERO019-9257

Attachment 5: TRCA-Correspondence-Bill-238-ERO-019-9467

Attachment 6: TRCA-Correspondence-MECP-Uxbridge-Park-Management-Plan-ERO-019-9209

Attachment 7: TRCA-Comments-7th-National-Biological-Diversity-Report-

Attachment 8: TRCA-Correspondence_Special-Economic-Zones-Act_ERO-025-0391

Attachment 9: TRCA-Correspondence_Bill-5-Endangered-Species-Act-2025_ERO-025-0380

Attachment 10: TRCA-Correspondence_Bill-5-Ontario-Heritage-Act_ERO-025-0418

January 6, 2025

CFN 62018

BY EMAIL ONLY mto.ero@ontario.ca

MTO ERO
Environmental Policy Office
Ministry of Transportation
438 University Ave, 12th Floor
Toronto, ON M7A 1N3

RE: ERO 019-9453 Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements

Thank you for the opportunity to provide comments on the Ministry of Transportation (MTO) Environmental Registry of Ontario (ERO) posting, “Highway 413 Focused Analysis Area and Northwest GTA Transmission Corridor Narrowed Area of Interest Refinements.”

Government Proposal

Ministry of Transportation and Ministry of Energy and Electrification (MEE) are seeking public consultation on the Focused Analysis Area (FAA), related to the Highway 413 project, and Narrowed Area of Interest (NAI), related to the Northwest GTA Transmission Corridor. A 30-day consultation for input on the proposed refinements is posted on the Environmental Registry of Ontario.

The 2024 Draft FAA for Highway 413 is the zone surrounding the preferred route for the Highway 413. The posting states that the FAA has been updated to include targeted refinements, incorporating key design updates and environmental considerations. These adjustments were informed by ongoing preliminary design work and environmental and field studies, allowing for a better understanding of impacts and alignment with local infrastructure. MTO will continue to review development applications in the Highway 413 study area but does not expect Highway 413 to have an impact on land applications made outside the FAA and within the study area.

TRCA understands that in early 2025, once the consultation is complete, the Ontario government will publish refinements to the FAA, helping to bring certainty to landowners along the proposed route. A description of all studies completed detailing environmental impacts, proposed mitigation measures and a record of consultation will be published in an Environmental Impact Assessment Report (EIAR) and posted on the project website. MTO does not anticipate any environmental impacts resulting from changes to the FAA.

TRCA Comments - ERO # 019-9453

TRCA has reviewed the above noted ERO posting, the Highway 413 Focused Analysis Area Refinement Bulletin and the updated interactive map found on the Highway 413 project website. In addition, on December 12, 2024, TRCA staff attended MTO's Highway 413 Technical Briefing on the draft FAA for impacted landowners. Specific changes to the FAA were presented to multiple stakeholders. At the briefing, TRCA staff identified the need to contact TRCA as soon as possible to initiate discussions related to TRCA-owned lands. MTO confirmed that TRCA would be contacted in January to discuss property impacts, negotiations and requirements. TRCA confirms there are no specific comments related to the draft refinements.

Additional Comments

TRCA is a landowner along the Highway 413 route, a public commenting body for applications under the Environmental Assessment Act, and a source protection authority under the Clean Water Act, and a regulator of development activity under the Conservation Authorities Act and associated regulations. Although Crown agencies are exempt from obtaining a conservation authority permit, the EA public commenting role, source protection role, and TRCA's Voluntary Review Process (VPR), enable Crown projects in TRCA's regulated area to benefit from TRCA science-based input at both the planning/siting stage and the detailed design stage. TRCA also provides long-term ecosystem and infrastructure monitoring support to numerous proponents of EAs within TRCA's watersheds including provincial and federal agencies on a voluntary fee for service basis.

TRCA has provided comments at various stages of the EA process as outlined in a staff report to TRCA Board of Directors, Item 7.2 GTA West Transportation Corridor Environmental Assessment Update, March 26, 2021. The Board report provides links to previous TRCA correspondence, including a comment letter dated July 3, 2020, outlining concerns related to route selection, impacts to TRCA-owned lands and other TRCA areas of interest.

TRCA recently provided comments on ERO# 019-9265 Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 – Building Highways Faster Act, 2024; ERO# 019-9266 Bill 212 - Framework for bike lanes that require removal of a traffic lane and ERO# 019-9213 Highway 413 Act in correspondence dated November 20, 2024 (attached). TRCA understands that this legislation received Royal Assent on November 25, 2024 and is in effect, however, please note that comments provided are still applicable in the next stages of the project.

As this project moves to land acquisition and detailed design stages, TRCA provides additional comments related to TRCA-owned lands, ecosystem compensation and trails:

- TRCA requests that discussions on required property acquisitions also be broadened to include discussion on potential acquisition and stewardship of environmentally significant lands being acquired by MTO in support of the MNR Minister approved TRCA Greenspace Acquisition Strategy, and the Humber and Etobicoke Creek Watershed Plans.

- TRCA requests a formal written commitment to provide ecosystem compensation. Please note further that TRCA has available for municipalities and the Province, extensive natural heritage data for the Humber River and Etobicoke Creek watersheds to inform ecosystem compensation discussions. We also offer TRCA's Ecosystem Compensation Guideline and can provide the TRCA Restoration Opportunities Database as science-based tools/resources to inform this commitment.
- TRCA requests a commitment to future proofing infrastructure and key socio-economic / recreational corridors along with the TRCA Regional Trail Strategy components. TRCA notes The Trail Strategy for the Greater Toronto Region (Trail Strategy) outlines TRCA's plan to work with partners to complete, expand, manage and celebrate the Greater Toronto Region Trail Network, a connected trail network in our regional greenspace system. It serves as a framework to protect potential trail alignments, and to guide the planning, development, and management of these trails. TRCA would also appreciate detailed working meetings with MTO prior to finalizing detailed designs where the proposed crossings intersect with Greater Toronto Region Trail Network components.
- TRCA would like to work with the Province, municipal, and agency stakeholders to integrate planning and design of both corridors to achieve active transportation, recreation and restoration opportunities within the proposed Northwest GTA Transmission Corridor similar to what we are doing with The Meadoway in the Gattineau Corridor in Toronto and Durham and in the Parkway Belt West Plan in York and Peel regions.
- TRCA requests a presentation by both MTO and IESO at a future meeting of the TRCA Board of Directors in early 2025.

Previous Comments

TRCA expects that comments provided to date, including those in the attachment to this submission, will be addressed in the draft Environmental Impact Assessment Report, TRCA-owned lands and acquisitions, CVC/TRCA/MTO Service Level Agreement and Voluntary Project Reviews (VPRs). We would also like to schedule meetings regarding the above noted points as early as possible in 2025.

We trust the above is clear and helpful for meeting TRCA, MTO and MEE shared objectives for environmental protection needed to support infrastructure.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

ATTACHMENT 1: TRCA-Correspondence-MTO_413-FAA-and-Northwest-GTATC-NAI-ERO-019-9453

Cc: Quentin Hanchard, Chief Administrative Officer, Credit Valley Conservation
Laurie Nelson, Director, Policy Planning, TRCA
Sameer Dhalla, Director, Development and Engineering Services, TRCA

Enclosure

TRCA Correspondence, MECP MTO ERO 019-9265 ERO 019-9266 ERO 019-9213,
dated November 20, 2024

November 20, 2024

POL-2024-00019

BY EMAIL ONLY

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**RE: ERO# 019-9265 Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 – Building Highways Faster Act, 2024; ERO# 019-9266 Bill 212 - Framework for bike lanes that require removal of a traffic lane
ERO# 019-9213 Highway 413 Act**

Thank you for the opportunity to provide comments on the Ministry of Environment, Conservation and Parks' (MECP) Environmental Registry of Ontario (ERO) posting, "Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 – Building Highways Faster Act, 2024" and the Ministry of Transportation's (MTO) ERO posting under Bill 212, "Highway 413 Act".

Government Proposal

These ERO proposals describe the proposed statutes being introduced under Bill 212 that would grant enhanced MTO powers for carrying out activities necessary to accelerate planning, design and construction of certain highways, including Highway 413. Examples of these activities include gathering information on utilities/infrastructure, expediting expropriation processes, and exempting some construction activities from the requirement for an Environmental Impact Assessment Report (EIAR).

Specifically, the Highway 413 Act will:

- Exempt all activities by or on behalf of the Minister of Transportation that are for or related to Highway 413 from the Environmental Assessment Act, and
- Create an accelerated environmental assessment process for the construction of Highway 413 and the extensions of Highways 410 and 427. The process will not apply to Highway 413 “early works” projects.
- Also under the proposed Highway 413 Act, the Minister of Transportation is required to fulfill the following requirements for the highway project:
 - Prepare a plan for consulting potentially impacted and interested Indigenous communities, circulate the plan to the communities and implement the plan,
 - Assess the impacts of the Highway 413 Project on the environment and identify how negative impacts will be mitigated, based on MTO’s preliminary design for the project,
 - Prepare and publish a draft Environmental Impact Assessment Report (EIAR) which will include a description of local environmental conditions and studies completed (e.g., fish and fish habitat, terrestrial ecosystems, archaeology, air quality, agriculture, noise, socio-economic, drainage and stormwater management), the assessment of impacts of the Highway 413 Project on the environment based on the preliminary design of the project, a description of how impacts will be mitigated and the record of consultation,
 - Provide Indigenous communities, government agencies, interested person and the public an opportunity to comment on the draft EIAR, and
 - Prepare a final EIAR, considering any comments regarding the draft EIAR and publish the final on the project website.

Additionally, under the proposed Highway 413 Act, “early works projects” and changes that are not a “significant change” will not be subject to the proposed accelerated environmental assessment process/EIAR process. This is intended to allow MTO to proceed with certain Highway 413 projects without having to complete an environmental impact assessment.

In the proposed Highway 413 Act, the Highway 413 “early works projects” include:

1. constructing an embankment for a ramp near the existing ramp at Exit 330 on westbound Highway 401, connecting to westbound Highway 407 in Halton Region,
2. constructing a bridge within the Highway 413 route that is within or near Highway 10 in Peel Region,

3. constructing a bridge within the Highway 413 route that is within or near Bovaird Drive West in Peel Region,
4. any related activities for the embankment or bridges described in a) to c), and,
5. constructing fencing for or related to any of the activities described in a) to d) or for or related to Highway 413.

The ERO posting states that the embankment and bridges projects were selected based on being located in areas that have been previously disturbed and being ones likely to have fewer environmental impacts compared to other areas of the highway.

Related to this, ERO posting 019-9265 states that the government is committed to balancing environmental protection with the need to support crucial infrastructure development that will benefit the economy. It states further that MTO will continue to maintain existing environmental processes to mitigate environmental impacts and address local concerns on a project-by-project basis.

We further understand that if the legislation is passed, it would come into effect on Royal Assent.

TRCA General Comments - ERO# 019-9265 and ERO# 019-9213

The proposals under Bill 212 are relevant to TRCA as a landowner along the Highway 413 route, as a public commenting body for applications under the Environmental Assessment Act, as a source protection authority under the Clean Water Act, and as a regulator of development activity under the Conservation Authorities Act and associated regulations. Although Crown agencies are exempt from obtaining a conservation authority permit, the EA public commenting role, source protection role, and TRCA's Voluntary Review Process (VPR), enable Crown projects in TRCA's regulated area to benefit from TRCA science-based input at both the planning/siting stage and the detailed design stage.

TRCA has been engaged in MTO's process of planning Highway 413 and is currently awaiting to hear back from MTO staff on next steps. Please see Appendix A to this letter for a background and current status of TRCA's review and most recent comments on the highway project.

TRCA has reviewed the above noted ERO postings and Schedule 2 (Building Highways Faster Act) and Schedule 3 (Highway 413 Act) of Bill 212 and provides the following comments here and in the table below on select aspects of the proposal for MECP's and MTO's consideration.

TRCA supports improving the proposed legislation and ensuring timely, cost-effective, and comprehensive review and approval of public infrastructure works both during the EA process and at detailed design. CAs' environmental review of the planning, siting and design of infrastructure projects is vital for avoiding and mitigating flood and erosion risks, protecting sources of drinking water and public health and safety, and the resilience of our natural environment to the impacts urbanization and compounding effects of climate change.

Prior to detailed design of Highway 413, adequate information needs to be collected

and used to ensure the preliminary design is feasible based on real world conditions. We also want the opportunity to review designs so that we understand impacts and mitigation strategies for all natural features and hazards within the alignment.

For example, if the erosion hazard is not defined for a valley crossing prior to assuming bridge pier locations, the piers could be found to be at imminent risk of erosion, and the valley and watercourse would need to be hardened, resulting in significant impacts to the natural environment and permanent, ongoing maintenance issues. TRCA is also involved in the review of infrastructure and development projects surrounding the proposed highway and it should be a priority for review teams to understand and coordinate proposed designs with the proposals and reviews of these proposals currently underway by TRCA and municipal partners related to these projects.

The ERO proposal states that the government “is committed to balancing environmental protection with the need to support crucial infrastructure development that will benefit the economy”. TRCA asserts that a comprehensive, upfront assessment of potential impacts through an EA is key for avoiding, mitigating and/or compensating for the environmental impacts of proposed infrastructure. This early assessment of potential impacts ensures resilience of the natural systems the infrastructure is affecting as well as the protection of the infrastructure itself. Moreover, there may be increased costs and time taken through the procurement process for detailed design and studies left to the permit/VPR stage that would be more efficiently completed at the early stages of infrastructure planning. Opportunities to coordinate planning and design of highway related infrastructure that minimizes risks of hazards with private and municipally proposed infrastructure in developing communities should also be maximized to achieve efficiencies and savings and to future proof government assets.

TRCA Detailed Comments

Proposed under Bill 212	TRCA Comments
<p>Where MTO has determined that property expropriation is necessary to support a priority highway project, the proposed legislation would, if passed, remove a property owner’s ability to apply to a judge for a later date of possession under 39(3) of the <u>Expropriations Act</u>. This is meant to ensure that the construction schedule for designated projects (e.g., Hwy 413) is not impacted. MTO would continue to work with property owners to determine appropriate expropriation and possession timelines.</p>	<p>Will MTO be committed to negotiating a mutually satisfactory agreement with TRCA to secure property requirements, and avoid initiating expropriation procedures?</p> <p>Will MTO be open to acquiring additional environmentally sensitive lands or lands that can be restored and transferred to the relevant conservation authority, municipality or appropriate public body steward as part of negotiations for impacted lands required for the designated projects?</p> <p>How can MTO’s project work support other government initiatives including MNR</p>

Proposed under Bill 212	TRCA Comments
	<p>Minister approved CA Greenspace Acquisition Strategies?</p> <p>When the final design of the highway is determined, what are the expected approximate timelines for acquisitions?</p>
<p>Under the proposed Act, the government must prepare and publish a draft Environmental Impact Assessment Report (EIAR) which will include:</p> <ul style="list-style-type: none"> • a description of local environmental conditions and studies completed (e.g., fish and fish habitat, terrestrial ecosystems, archaeology, air quality, agriculture, noise, socio-economic, drainage and stormwater management), the assessment of • impacts of the Highway 413 Project on the environment based on the preliminary design of the project, • a description of how impacts will be mitigated and the record of consultation 	<p>Please provide clarification on review timelines and how comments on the draft EIAR will be incorporated/addressed in the final EIAR?</p> <p>How will TRCA information, data and staff expertise be utilized in this proposed process? How can TRCA secure a robust VPR agreement with MTO to allow our full and intensive involvement in technical review discussions as part of this process or as part of the earlier commitment by MTO under the current EA approach?</p>
<p>As noted above, the proposed statute exempts Highway 413 early works projects from the <u>Environmental Assessment Act</u>. Under the proposed statute, Highway 413 early works projects are not subject to the accelerated EA process described above, which will allow MTO to proceed with Highway 413 early works projects without having to complete any environmental impact assessment if the Act is passed.</p> <p>In the proposed Highway 413 Act, the Highway 413 early works projects include:</p> <ol style="list-style-type: none"> 1. constructing an embankment for a ramp near the existing ramp at Exit 330 on westbound Highway 401, connecting to westbound Highway 407 in Halton Region, 2. constructing a bridge within the Highway 413 route that is within or near Highway 10 in Peel Region, 	<p>Of the early works listed, the bridge construction (2), related activities (4) and fencing (5) would fall within TRCA's jurisdiction. Through the VPR process, TRCA requests any crossings of valley and stream corridors meet the objectives of TRCA's Crossings Guideline for managing natural hazards and for protection of regulated features. In addition, where applicable, TRCA would request that MTO apply the mitigation hierarchy of avoidance, mitigation and compensation where any filling and grading works associated with fencing or other activities may affect TRCA regulated areas. TRCA requests that MTO staff provide details of this proposed infrastructure and meet with our technical teams at the earliest possibility to discuss these proposals and proposed mitigation and compensation strategies related to the proposed impacts.</p>

Proposed under Bill 212	TRCA Comments
<p>3. constructing a bridge within the Highway 413 route that is within or near Bovaird Drive West in Peel Region,</p> <p>4. any related activities for the embankment or bridges described in a) to c), and,</p> <p>5. constructing fencing for or related to any of the activities described in a) to d) or for or related to Highway 413.</p> <p>The ERO proposal states that the embankment and bridges projects were selected based on being located in areas that have been previously disturbed and being ones likely to have fewer environmental impacts compared to other areas of the highway.</p>	
<p>Details of the EIAR from Schedule 3, Bill 212</p>	
<p>6 (1) The Minister shall prepare a draft environmental impact assessment report in accordance with subsection (2). Contents (2) The draft environmental impact assessment report shall contain the following:</p> <p>1. A statement of the purpose of the Highway 413 Project.</p> <p>2. A description of the Highway 413 Project based on the Ministry's preliminary design for the Highway 413 Project.</p> <p>3. A map showing the location of Highway 413 and extensions of Highway 410 and Highway 427 to connect them to Highway 413.</p> <p>4. One or more maps and drawings showing the Ministry's preliminary design for the Highway 413 Project, including the alignment for Highway 413 and extensions of Highway 410 and Highway 427 to connect them to Highway 413.</p> <p>5. A description of the other alignments for Highway 413 and extensions of Highway 410 and Highway 427 to connect them to Highway 413 that were considered by the Ministry since November 1, 2012.</p> <p>6. The rationale for selecting the alignment for Highway 413 and extensions of Highway 410 and Highway 427 to connect them to Highway 413.</p>	<p>Clarification is required on how and who is responsible for impacts on the hydrological function of the natural system. TRCA has significant concerns that the design of the highway (i.e., culverts, grading, etc.) will adversely impact flooding and erosion. It is strongly recommended that MTO maintain their previous commitment to follow the TRCA VPR process during detailed design.</p> <p>The Highway is located within the Settlement Area Boundary Expansion (SABE) area within the Town of Caledon, where New Community Areas and New Employment Areas are proposed within the Town expanded Urban System. These lands require subwatershed studies (i.e., Local Subwatershed Study (LSS)) to bring these lands into the urban settlement area. As part of these studies, impacts on flooding and erosion will be assessed and adequately mitigated to ensure no adverse impacts to receiving and downstream systems, including drinking water supplies.</p> <p>The proposed Highway 413 poses additional complexities that must now be considered by the private landowners and Town undertaking Secondary Plans and supporting LSS work. The Secondary</p>

Proposed under Bill 212	TRCA Comments
<p>7. A summary of the local environmental conditions of the Highway 413 route identified by the Ministry.</p> <p>8. A description of studies of the environment completed or updated by the Ministry after November 1, 2012 in respect of the Highway 413 Project.</p> <p>9. The Minister’s assessment under clause 5 (1) (a) of the impacts of the Highway 413 Project on the environment.</p> <p>10. The Minister’s criteria for the assessment of impacts referred to in paragraph 9.</p> <p>11. A description of how the Ministry will mitigate negative impacts of the Highway 413 Project on the environment as identified under clause 5 (1) (b).</p> <p>12. A description of how the Ministry will monitor and verify the effectiveness of its mitigation referred to in paragraph 11. 13. A list of any provincial, federal or other authorizations that may be required for the Highway 413 Project based on the Ministry’s preliminary design for the Highway 413 Project.</p> <p>14. A consultation record, including,</p> <ul style="list-style-type: none"> i. a summary of consultation carried out with Indigenous communities in respect of the Highway 413 Project after November 1, 2012, including a summary of, <ul style="list-style-type: none"> A. comments submitted and concerns raised by Indigenous communities, and B. discussions that the Ministry had with Indigenous communities, ii. a summary of consultation carried out with the public in respect of the Highway 413 Project after November 1, 2012, including a summary of written comments and concerns submitted by members of the public, and iii. a description of what the Ministry did to respond to concerns referred to in subparagraphs i and ii. Studies, para. 8 of subs. (2) (3) The studies referred to in paragraph 8 of subsection (2) includes studies related to, (a) fish and fish habitat; (b) terrestrial ecosystems; (c) 	<p>Plans and their supporting LSS will require an additional gap analysis to ensure that development proposed within the new Urban System is not located within hazardous lands due to the impacts from the proposed Highway.</p> <p>Highway 413 has the potential to increase natural hazards (flooding) on adjacent development lands if not managed adequately and with an understanding of the subwatershed planning currently being undertaken.</p> <p>It is understood that an EIAR will be completed, however, it is unclear who is responsible for completing the report and evaluation to ensure that new urban development adjacent to the proposed Highway is located outside of hazardous lands. There is potential for the Highway to cause significant impacts as related to flood and erosion control. There is no clarity provided on the specifics of the review process and if qualified professionals will be completing the review and assessment. Confirmation is required on whether the evaluation will be completed using a watershed or subwatershed planning approach. TRCA notes that if MTO maintains its commitment to follow the TRCA VPR process, leverage watershed and subwatershed work of TRCA and partners, and obtain TRCA signoff, this concern can be partially addressed.</p> <p>Previously where major development including new infrastructure has been proposed the Province has participated in and supported subwatershed studies (e.g., Seaton in Pickering, etc.). TRCA would welcome additional support from the Province to advance watershed and subwatershed planning where it is in progress or required.</p>

Proposed under Bill 212	TRCA Comments
<p>archaeological resources; (d) air quality; (e) agriculture; (f) noise; (g) socio-economic conditions; and (h) drainage and stormwater management. Publication of studies (4) The Minister shall publish the studies and updates of studies described in the draft environmental impact assessment report on the Project website, except where, in the opinion of the Minister, the studies or updates of studies contain information about sensitive natural or cultural heritage matters.</p>	
<p>Final environmental impact assessment report 8 (1) After publishing the notice of draft environmental impact assessment report under clause 7 (3) (b), the Minister shall do the following:</p> <ol style="list-style-type: none"> 1. Provide the Indigenous communities and persons to whom a copy of the notice under clause 7 (3) (a) is required to be given and the public an opportunity to submit written comments on the draft environmental impact assessment report. 2. Provide access to a copy of the draft environmental impact assessment report to the Indigenous communities and persons to whom a copy of the notice under clause 7 (3) (a) is required to be given and to the public by publishing a copy on the Project website or by such other means as the Minister considers appropriate. 3. Prepare the final environmental impact assessment report in accordance with subsections (2) and (3). <p>Preparation of final environmental impact assessment report (2) In preparing the final environmental impact assessment report, the Minister shall do the following:</p> <ol style="list-style-type: none"> 1. Consider any concerns that were raised regarding the draft environmental impact assessment report in comments provided by the Indigenous communities referred to in paragraph 1 of subsection (1). 18 	<p>The proposed Act requires MTO to only consider comments provided by stakeholders. Is there recourse for stakeholders should the response to comments on the draft EIAR be inadequate or incomplete involving MECP such as imposed conditions by the Minister and if not, can this be clarified? There is no policy regime to guide decision makers and to inform stakeholders how their concerns are being evaluated and responded to. This creates uncertainty in the process and could establish inconsistent decision-making practices. This inconsistency could make it difficult for public authorities to require private landowners and developers to adhere to policy and standards for their private planning applications nearby and/or adjacent to the Highway. It is again recommended that the EA process be followed and that MTO follows through on its earlier commitment to follow the TRCA VPR process to help address, property, infrastructure, and ecosystem flooding and erosion risks. As mentioned earlier additional support and involvement by the Province in subwatershed planning work being undertaken with landowners, TRCA and the municipalities in the study area would be welcome.</p>

Proposed under Bill 212	TRCA Comments
<p>2. Consider any concerns that were raised regarding the draft environmental impact assessment report in written comments submitted by the following persons by the date set out in the notice of draft environmental impact assessment report distributed under section 7 by which written comments must be submitted: i. Persons to whom a copy of the notice under subclauses 7 (3) (a) (ii) to (iv) is required to be given. ii. Members of the public</p>	
<p>Non-application of Planning Act provisions 12 (1) Clause 3 (5) (a) of the Planning Act does not apply to a decision of a minister of the Crown or a ministry, board, commission or agency of the Government of Ontario in respect of the Highway 413 Project, including any change to the Highway 413 Project, or the Highway 413 early works projects. Same (2) Subsection 3 (6) of the Planning Act does not apply in respect of the Highway 413 Project, including any change to the Highway 413 Project, or the Highway 413 early works projects.</p>	<p>Given that Highway 413 is not subject to provincial natural hazard policy from Provincial Plans and the Provincial Planning Statement, it is important for TRCA to be engaged to ensure that development activity associated with the Project does not affect the control of flooding or erosion, and will not create conditions or circumstances that, in the event of a natural hazard, might jeopardize the health or safety of persons or result in the damage or destruction of property. Through the VPR process, TRCA would also like to review impacts, mitigation, and proposed compensation for areas important for the management of natural hazards within conservation authorities' areas of jurisdiction, including river or stream valleys and wetlands.</p> <p>Although CAs' commenting role is restricted with respect to some natural heritage impacts/matters (e.g., terrestrial and aquatic species impacts), it is mandatory for CAs to have programs and services to conserve, protect, rehabilitate, establish, and manage natural heritage located within the lands owned or controlled by the authority. In this regard, TRCA requests that Highway 413 impacts to TRCA-owned lands be compensated for so as to avoid losses to the natural heritage system on these lands, and that MTO engage municipalities who must fill the gap for addressing impacts to natural heritage systems outside TRCA-owned lands.</p>

Proposed under Bill 212	TRCA Comments
	Please note further that TRCA has available for municipalities and the Province, extensive natural heritage data for the Humber River and Etobicoke Creek watersheds. We also offer TRCA's Ecosystem Compensation Guideline and can provide the TRCA Restoration Opportunities Database as science-based tools/resources.

TRCA Recommendations

- TRCA recommends that the Provincial EA Act process be followed to ensure a comprehensive review of potential impacts and mitigation with this significant project and that MTO closely review and respond to TRCA's earlier submissions as part of the current EA process and this alternative proposed process if it is followed.
- TRCA recommends greater participation and financial support by MTO in ongoing watershed and subwatershed work underway involving landowners, municipalities and TRCA to help understand and manage risks.
- If the government proceeds with this approach TRCA recommends that MTO follow through on its earlier commitment to enter into a VPR with TRCA so that we can continue to be regularly engaged in the review of the Highway 413 project, and in support of any EA streamlining process and Environmental Impact Assessment Report, to identify environmental concerns and flag necessary measures to avoid and mitigate environmental losses, reduce hazards including downstream flooding impacts in the Etobicoke and Humber watersheds, and to reduce risk of economic losses from infrastructure failures.
- We recommend that MTO conduct regular technical meetings with TRCA staff along with presentations to the Board of Directors and our municipal partners and landowner groups we are working with on subwatershed studies so as to coordinate planning and design of infrastructure on the project to reduce risks and achieve efficiencies.
- TRCA requests that if the government proceeds with this legislation that nothing in the new legislation prevent the VPR process from being undertaken and that TRCA's comments to date relevant to this study outlining impacts to TRCA property and TRCA's areas of interest be addressed, including TRCA Board of Directors endorsed comments in the March 2021 board report (see Appendix A to this letter).

- TRCA requests that ecosystem compensation be provided for impacts to TRCA-owned lands.
- TRCA requests that discussions on required property acquisitions also be broadened to include discussion on potential acquisition and stewardship of environmentally significant lands being acquired by MTO in support of the MNR Minister approved TRCA Greenspace Acquisition Strategy, and the Humber and Etobicoke Creek Watershed Plans.

We trust the above is clear and helpful for meeting TRCA, MTO and MECP shared objectives for environmental protection needed to support infrastructure.

TRCA Comments - ERO# 019-9265 and ERO# 019-9266

The [Trail Strategy for the Greater Toronto Region](#) (Trail Strategy) outlines Toronto and Region Conservation Authority's (TRCA) plan to work with partners to complete, expand, manage and celebrate the Greater Toronto Region Trail Network, a connected trail network in our regional greenspace system. It serves as a framework to protect potential trail alignments, and to guide the planning, development, and management of these trails.

The Greater Toronto Region Trail Network supports a diversity of activities throughout the seasons, including active transportation. Walking, jogging, cycling, or using a mobility device to travel to transit, workplaces, schools, and other daily destinations supports climate change mitigation, healthy living, and complete communities, while also addressing the first- and-last-mile regional transit issue.

Included in the Greater Toronto Region Trail Network are the Bloor Street bike lanes in the City of Toronto. These lanes provide a significant east-west connection for the existing trail network in our regional greenspace system between the Lower Don Trail, which is part of the Trans Canada Trail, and the Humber River Recreational Trail.

The ERO posting also states that MTO will be contacting targeted stakeholders, including large municipalities, to advise them of the proposal and to leverage municipal expertise to develop an approval approach and criteria for municipalities on the installation of new cycling infrastructure.

Furthermore, TRCA manages trail infrastructure and is advancing trail work in the Town of Caledon and City of Vaughan with involvement of municipalities and community stakeholders that will be impacted by the proposed design of the Highway 413 project discussed above.

TRCA requests to be included in these consultations with the Province and our municipal partners who are working together to advance the TRCA Trail Strategy and seeking opportunities for maintaining and enhancing trail and bike lane connectivity.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services

Enclosure - APPENDIX A – TRCA Background and Comments – Highway 413

APPENDIX A – TRCA Background and Comments – Highway 413

Background

TRCA has been engaged in MTO's process of planning Highway 413 and is currently awaiting to hear on next steps from MTO staff.

Through our involvement, TRCA understands that the MTO Highway 413 Project Team is continuing to advance the provincial environmental assessment process through refinements to the design of the route of the new highway and transit corridor. Through this process, the Project Team is undertaking field work and investigations to inform the design and mitigation measures for potential effects of the project.

The following provides a background and summary of MTO/TRCA engagement on the Highway followed by the most recent comments TRCA provided to MTO.

TRCA had provided comments at various stages of the EA process as outlined in a staff report to TRCA Board of Directors, [Item 7.2 GTA West Transportation Corridor Environmental Assessment Update, March 26, 2021](#). The Board report provides links to previous TRCA correspondence, including a comment letter dated July 3, 2020, outlining concerns related to route selection, impacts to TRCA-owned lands and other TRCA areas of interest.

The following from the 2021 Board report outlines commitments from the MTO Project Team at that time with respect to the Highway corridor where it crosses through TRCA's jurisdiction; the points below also speak to MTO's approach as it applies to Credit Valley Conservation (CVC) and Conservation Halton (HC) jurisdictions. MTO, TRCA and CVC have been working towards a service level agreement to support the future VPR process review committed to by MTO.

New Crossings: MTO stated that they would consider using TRCA's Crossings Guideline for Valley and Stream Corridors (2015) as a reference. The Preliminary Design of the multimodal transportation corridor will follow the Transportation Association of Canada (TAC) Geometric Design Guide for Canadian Roads and MTO's supplemental guidelines and will then be balanced with other guidelines with industry practices, as appropriate. Through the Preliminary Design stage, information about each watercourse and headwater drainage feature including proposed sizing of crossings, consideration of wildlife passage and fluvial geomorphology, flood conveyance, etc., will be compiled and the project report will document the proposed sizing of crossings that will be further developed during future stages of the study, if approved. A consistent approach will be applied throughout the Route Planning Study Area within the three conservation authority jurisdictions.

MTO staff noted that the GTA West/Highway 427 freeway-to-freeway interchange location is subject to significant constraints including the north-south hydro corridor adjacent to the current Highway 427 extension, watercourses, interchange spacing to the west, a rail crossing, and the crossing location of the Humber River. Based on the

combination of these constraints, the ability to shift the interchange is very limited. The refinement of the transportation corridor alignment will be reviewed by the design team during Preliminary Design to work to minimize impacts to the mainline Humber River and associated tributaries. Options to reduce the impact to flood plain area will be explored and reviewed further as Preliminary Design progresses and TRCA continues to work the EA project team to address TRCA concerns.

Stormwater Management: MTO confirmed that impacted conservation authorities (TRCA, CVC, CH) and municipalities will be contacted to confirm stormwater management criteria. Impact assessment on a SWM outlet basis will be undertaken and a comprehensive stormwater management strategy will be developed at the EA/preliminary stage for the Preferred Route to address water quality, quantity, erosion, and water balance criteria. TRCA's Stormwater Management Criteria document, as well as the stream crossing guidelines of the various conservation authorities will be considered. A consistent approach will be applied throughout the Route Planning Study Area within the three conservation authority jurisdictions.

Habitat Connectivity and Wildlife Passages: TRCA identified numerous technical studies that should be completed at the EA stage. Of particular importance is the analysis and identification of existing habitat and potential impacts to habitat connectivity and mitigation strategies in advance of Preliminary Design for adequate avoidance and mitigation of impacts. To this end, MTO had requested further data from TRCA related to completed analysis that can help inform opportunities and areas of concern about habitat connectivity and wildlife crossings in the GTA West study area to incorporate into the development of the wildlife crossing design for the project. TRCA staff worked with MTO to provide the predicted regional habitat connectivity priorities based on Circuitscape model (Attachment 1: Map 1, Regional Connectivity) and the mapped local habitat connectivity priorities based on accessible habitat and habitat network concept.

MTO has also confirmed that development of the wildlife passage design will follow the MTO 2017 Environmental Guide for Mitigation Road Impacts to Wildlife, which MTO considers for all new highway projects. In addition to data acquired through field investigations, wildlife movement and landscape connectivity will be assessed during the Preliminary Design phase to inform wildlife passage locations through the review of background studies (e.g., subwatershed studies, natural heritage studies) and guidance documents (e.g., TRCA Crossings Guideline for Valley and Stream Corridors). Additionally, MTO has confirmed that during Preliminary Design, watercourse crossing reports will be developed for each watercourse crossing/or groups of crossings that will be multi-disciplinary (i.e., fish and fish habitat, terrestrial / wildlife movement, fluvial geomorphology, hydrology/hydraulics, valley form / slopes etc.). The combined input will be used to generate the minimum span requirements and will inform, realignment recommendations. Opportunities for wildlife passages and incorporation of road ecology principles will be identified during Preliminary Design.

Mitigation and Compensation: MTO confirmed their intention is to integrate mitigation and compensation features such as Species at Risk and wildlife crossings, and avoidance of sensitive features such as groundwater recharge areas where possible with consideration of factors from other disciplines. Preliminary plans to address negative effects of the project on the natural environment including but not limited to edge management, environmental monitoring, mitigation, restoration, and compensation, etc., will be developed during the Preliminary Design, and include high-level commitments and the identification of the objectives for each respective plan. Plans are typically not fully developed and finalized until detailed design. MTO will consult TRCA and other agencies during the detailed design stage when these plans are anticipated to be finalized.

Salt Loading: MTO confirmed that impacts of salt loading to surface and groundwater features, salt spray to terrestrial habitats, the spread of invasive species along transportation, and fragmentation of habitats and migration corridors will be considered during the preliminary and detail design phases of the project.

Climate Change: MTO confirmed that all new drainage infrastructure (culverts, storm sewers, ditches, etc.) will be designed considering climate change impacts. According to the provincial engineering memorandum (PEM) "Implementation of the Ministry's Climate Change Consideration in the Design of Highway Drainage Infrastructure" (#2016-14, October 28, 2016), highway drainage infrastructure should be designed to accommodate future rainfall values for the year corresponding to the end of the Design Service Life (typically 75 years) of the structure, in respect to conveyance, erosion, scour, stormwater management and fish passage.

TRCA Land Base Compensation: MTO stated that once EA approval is obtained and approval to acquire lands is obtained, MTO staff would contact TRCA regarding their impacted lands to begin negotiations. MTO noted that only high-level construction costs were developed to support the evaluation of the short-list of route alternatives and that there were several other factors and criteria, such as the value of environmental mitigation measures, compensation, and enhancements, that were not applied as cost considerations in the evaluation process. No commitment to include TRCA land base compensation and future TRCA land acquisition costs within the costing analysis was provided.

TRCA Land Avoidance and Impact Mitigation: MTO committed to working with TRCA through the Preliminary Design phase to arrive at a solution that balances, to the extent possible, the benefits and impacts for the local communities, regulatory agencies (including TRCA), and the users of the transportation system. MTO further noted that consideration will be given to specific property impacts such as fragmentation, and efforts will be made to minimize those impacts including access to TRCA owned lands during Preliminary Design.

Trail Network: MTO stated that active transportation components such as sidewalks and cycling facilities at crossing roads and connecting to/continuing trail systems at

watercourse crossings on a case-by case basis are being considered and further investigated during the Preliminary Design and detail design phases of this study. MTO stated that the 2019 TRCA Regional Trail Strategy for the Greater Toronto Region as well as municipal active transportation plans and Official Plans will be referenced. A separate active transportation corridor adjacent to the multimodal transportation corridor is not being considered at this time.

The following are other TRCA reviews in chronological order since the 2021 Board report.

July 2023

Major Crossing Structures Evaluation Process and Criteria, Final Draft Highway 413 Transportation Corridor Route Planning, Preliminary Design and Environmental Assessment Project, Stage 2 – TRCA provided comments on July 11, 2023

August 2023

Draft Initial Project Description - Highway 413 Transportation Corridor Route Planning, Preliminary Design and Environmental Assessment Project, Stage 2 – TRCA provided comments on August 1, 2023

September 2023

Municipal Advisory Group and Regulatory Agency Advisory Group Meeting for the Highway 413 Project September 26, 2023 – TRCA staff attended.

November 2023

MTO reviewed and provided comments on draft CVC, TRCA and MTO Service Level Agreement (SLA) supporting the VPR.

March 2024

TRCA provided comments on MTO Drainage Report in letter of March 2024.

January 9, 2025

POL-2025-00026

BY E-MAIL ONLY

resources.development@ontario.ca

Ministry of Natural Resources
Development and Hazard Policy Branch
300 Water Street
Peterborough, ON K9J 8M5

Re: Enabling the Development of Commercial-Scale Geological Carbon Storage in Ontario: The Geological Carbon Storage Act (ERO 019-9299)

Thank you for the opportunity to provide comments on the “Enabling the Development of Commercial-Scale Geological Carbon Storage in Ontario: The Geologic Carbon Storage Act” posted on the Environmental Registry of Ontario (ERO) by the Ministry of Natural Resources (the Ministry).

Toronto and Region Conservation Authority (TRCA) has an interest in how the proposed Act may affect drinking water sources as a source protection authority under the Clean Water Act, as set out in the Mandatory Programs and Services regulation (Ontario Regulation 686/21) for conservation authorities. Further, our comments are informed by TRCA staff’s technical expertise in groundwater (hydrogeology).

Government Proposal

We understand that the Ministry is consulting on the Geologic Carbon Storage Act, enacted by part of Schedule 2 of Bill 228 Resource Management and Safety Act, 2024. Previously, the Ministry consulted on developing a regulation to allow proponents to seek approval for special projects, including carbon storage. Ontario Regulation 425/23 – Special Projects made under the Oil, Gas and Salt Resources Act took effect on January 1, 2024. Feedback on a discussion paper was requested, through the Environmental and Regulatory Registries later in 2024, on the design of a new framework for commercial-scale carbon storage.

The proposed Geological Carbon Storage Act enables the regulation of commercial-scale geologic carbon storage in Ontario. The Act would define and regulate research and evaluation activities, and carbon storage activities associated with the permanent storage of carbon dioxide in underground geologic formations. The Act would also prohibit undertaking activities unless they are carried out in accordance with a permit and are within areas and storage repositories prescribed by the regulations.

The posting further states that developing a comprehensive framework that regulates the carbon storage process would help ensure that measures are in place to safeguard people and the environment. The proposed framework is also intended to manage any associated risks, including minimizing the potential for leaks to the surface or drinking water sources, induced seismicity, or interactions with other resource activities.

TRCA Comments

TRCA staff have reviewed the ERO posting and the supporting materials and provide the following detailed comments and recommendation for the Ministry's consideration.

Although the proposed target geologic formations for commercial scale carbon storage are outside the TRCA jurisdiction, TRCA staff are concerned about some of the unknowns associated with this technology and the potential impacts to potable water supply wells and drinking water quality.

From the background mapping provided, it appears that the target repository for commercial scale geologic carbon storage in Ontario will be the Cambrian sandstones along the north shore of Lake Erie and the south shore of Lake Huron. These formations have not been extensively studied in terms of their porosity and permeability. However, it is known that injection of CO₂ into these rocks will result in significant pressure increases within the formation(s) and that these pressures will extend well beyond the area of CO₂ injection.

These pressures could stress seals on poorly abandoned legacy wells, resulting in upward movement of saline waters, methane, or hydrogen sulfide into overlying freshwater aquifers. Such legacy wells are a known concern in Southwestern Ontario, highlighted by the 2021 explosion in downtown Wheatley, which resulted in injuries to residents and extensive damage to buildings

(<https://www.cbc.ca/news/canada/windsor/wheatley-explosion-gas-wells-1.6161023>).

TRCA recommends prior to implementation of geologic carbon storage in southern Ontario, that the Province implement studies to improve both the local and regional understanding of the potential carbon storage reservoirs involved as well as the potential implications to the overlying freshwater aquifers and potable water wells.

This work should build upon the following resources and recent efforts by the Geologic Survey of Canada and the Ontario Oil, Gas and Salt Resources Library to develop a 3-Dimensional Paleozoic bedrock geologic model for Southern Ontario (Carter, T., Brunton, F. R., Clark, J., Fortner, L., Logan, C. E., Russell, H. A. J., Somers, M. & Yeung, K. (2019). A 3-D geologic model of the Paleozoic bedrock of southern Ontario. Geological Survey of Canada, Open File, 8528.

<https://doi.org/10.4095/313560>).

Should you have any questions, require clarification on any of the above, or wish to meet to discuss our remarks, please contact the undersigned at (416) 667-6290 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services

ATTACHMENT 3: TRCA-Correspondence-MECP-ERO-019-945

January 17, 2025

POL-2024-00025
BY EMAIL ONLY
natasha.leahy@ontario.ca

Natasha Leahy
Ministry of Environment, Conservation and Parks
Great Lakes Office
40 St. Clair Avenue West, Floor 10
Toronto, ON M4V 1P5

RE: ERO# 019-9455 2016-2020 Cumulative Impact Assessment under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement

Thank you for the opportunity to provide comments on the Ministry of Environment, Conservation and Parks (MECP), “Cumulative Impact Assessment under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement.”

Toronto and Region Conservation Authority (TRCA) undertakes several roles affecting the health of the Great Lakes within its watershed-based jurisdiction that includes the Lake Ontario shoreline. TRCA is a plan review agency assisting the Province and municipalities to manage the natural hazards of flooding and erosion, a regulator of river and stream valleys, wetlands and shorelines, and is a Source Protection Authority under the Clean Water Act. These roles are set out in the Mandatory Programs and Services regulation (Ontario Regulation 686/21) for conservation authorities under the Conservation Authorities Act. TRCA’s comments are informed by TRCA staff’s technical expertise in water resources and staff involvement in a number of Lake Ontario partnerships, in which TRCA:

- Collects environmental data through our ongoing waterfront (and watershed) monitoring programs and contributing to the advancement of scientific knowledge
- Conducts scientific studies to improve our understanding of lake and land-to-lake dynamics, such as analyzing data and undertaking modelling to better understand future climate impacts and water quality stressors from watersheds
- Contributes to surveillance and management efforts, such as invasive carp

ATTACHMENT 3: TRCA-Correspondence-MECP-ERO-019-945

surveillance and sea lamprey control

- Provides aquatic resources expertise to internal and external waterfront project proponents, including at Aquatic Habitat Toronto meetings, to ensure waterfront projects consider shared Lake Ontario management priorities and best practices
- Participates in technical committees to protect Lake Ontario water quality and ecosystem health, including those that consider the lake as a significant source of drinking water for Ontarians, among several others.

Government Proposal

The ERO posting states that MECP is seeking input on the actions Ontario should take in response to the 2016-2020 Cumulative Impact Assessment of Withdrawals, Consumptive Uses and Diversions (the Impact Assessment), including if regulations should be made under the Ontario Water Resources Act and the content of those regulations. The Impact Assessment is an accounting of water that flows into and out of the Great Lakes-St. Lawrence River Basin (Basin). These flows vary from year to year either due to variability in climate or due to human activities.

The Impact Assessment is a requirement under the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement (SWRA). The SWRA is an agreement that was signed in 2005 by Ontario, Québec and the eight Great Lakes States (Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania and Wisconsin), to address concerns about large-scale water diversions and bulk exports from the Great Lakes-St. Lawrence River Basin, growing water use demand and effects of a changing climate on water supply and demand.

In Ontario, commitments set out in the SWRA are implemented primarily through the Ontario Water Resources Act and the Water Taking and Transfer Regulation (O. Reg 387/04).

The Impact Assessment is required every five years, or upon request of one or more Parties, or when a certain amount of water has been lost from the Basin since the last assessment. It presents an assessment of the cumulative impacts of withdrawals (e.g., taking water through pumping wells), consumptive uses (e.g., water lost and not returned through evaporation or through manufactured products) and diversions (e.g., diverting water within or out of the Basin through canals) on the Basin's water budget.

General Comments

TRCA staff have reviewed the ERO posting and the Impact Assessment and offer the following comments and recommendations regarding what may be data gaps, that once addressed, could provide a better indication of issues to be addressed through future regulations.

ATTACHMENT 3: TRCA-Correspondence-MECP-ERO-019-945

Topic	TRCA Detailed Comments
Hydrological Effects of Consumption Uses and Diversions	<p>The Impact Assessment does not speak to regulations that MECP might consider (as outlined in the ERO posting), beyond what is already in place. The document suggests that consumptive uses and diversions are insignificant relative to the non-human water balance components. It is unclear what issues further regulations would address in the context of the report.</p> <p>Engaging the parties through the SWRA for exploring changes at the national and/or binational level might be more effective than Ontario-focused regulations, given the scale of what is being considered.</p>
Consideration of Uncertainty	<p>In terms of the future work that is presented in the report, we support using the Large Lake Statistical Water Balance Model developed by Michigan University, for future assessment work, which could be very helpful in reducing what are described as significant uncertainties in the Great Lakes water budget. However, it is unclear how this model incorporates future climate projections. Basin-wide climate projections are critical to understanding how the trends in Great Lakes water budget components, that seem to already be occurring, will continue in the future, and how that might inform adaptive management and regulations.</p> <p>Through TRCA's involvement in the bi-national Lake Ontario Partnership, we understand that some of this basin-wide climate modelling work may already be underway by the US Army Core of Engineers (see: https://www.lrd.usace.army.mil/Mission/Programs/Article/3646559/great-lakes-coastal-resiliency-study/). Perhaps that work is needed first before any significant regulatory changes are implemented. The modelling should also extend to the St. Lawrence River basin, since that is the location of basin-wide outflow measurements, which are not fully considered and may be a significant source of uncertainty.</p>
Groundwater Input	<p>Given the limited groundwater data and models available, we support that this assessment does not consider groundwater inputs to the Great Lakes. The document indicates that the limited research to date suggests that groundwater has limited effect on the basin's water budget. To validate this assumption, however, TRCA recommends that research be conducted so that groundwater insights can be incorporated into future assessments.</p>
Intra-basin Diversions	<p>Lake Superior water budget: Intra-basin diversions into the Lake Superior watershed include the Ogoki and Long Lac Hydroelectric power plants, which divert a combined 155 m³/s from the Hudson Bay watershed. Please see the Great Lakes Diversion Fact Sheet at this link - https://www.ijc.org/en/labc/watershed/great-lakes-diversions. These two diversions are not mentioned as inputs in the Impact Assessment.</p>

ATTACHMENT 3: TRCA-Correspondence-MECP-ERO-019-945

Topic	TRCA Detailed Comments
	<p>This is only about 3% of the total inflows but should be included for completeness.</p> <p>Lakes Michigan-Huron water budget: Intra-basin diversions out of this watershed should include the two outflows collectively known as the Chicago Ship Channel or the Chicago Diversion, which diverts 91 m³/s into the Mississippi River watershed. As with the Lake Superior water budget, this represents a small fraction of the overall outflows (~1%) but should be included for completeness.</p>

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services

January 20, 2025

POL-2025-00022

BY E-MAIL ONLY

sarah.parna@ontario.ca

Sarah Parna
Ministry of Environment, Conservation and Parks
Species at Risk Recovery Section
300 Water Street, 5th Floor, North Tower
Peterborough, ON K9J 3C7

Re: Developing government response statements for three species at risk under the Endangered Species Act, 2007 (ERO 019-9257)

Thank you for the opportunity to provide comments on the “Developing government response statement for three species at risk under the Endangered Species Act, 2007” posted on the Environmental Registry of Ontario (ERO) by the Ministry of Environment, Conservation and Parks (MECP). Toronto and Region Conservation Authority (TRCA) previously commented on the “Regulatory changes under the Endangered Species Act to improve implementation of the species at risk program” (ERO 019-8016) posted to the ERO, on February 20, 2024.

TRCA continues to support our provincial and municipal partners in the research and science of protecting and recovering species at risk in Ontario, through our mandate under the Conservation Authorities Act and associated regulations. Our comments are informed by TRCA’s technical expertise in terrestrial ecology and our ongoing monitoring, research, and ecological restoration works.

Government Proposal

Species at risk and their associated habitats are protected in Ontario under the Endangered Species Act, 2007. Information and policy guidance is developed to support the protection and recovery of a species once it is listed as endangered or threatened. With the input of external organizations, recovery strategies are then finalized, and the Province develops a government response statement for each recovery strategy.

We understand that MECP is developing government response statements, that include species-specific policies that identify and prioritize actions to protect and recover the species, in response to recommendations in recovery strategies. The proposed policies are for the following three species at risk under the Endangered Species Act:

- Chimney Swift (a small dark gray-brown bird that breeds in central and southern Ontario);
- Davis’s Shieldback (a large cricket found in a limited region of southern Ontario); and,
- Lesser Yellowlegs (a small migratory shorebird that breeds in northern Ontario).

TRCA Comments

TRCA staff reviewed the ERO posting and the “Draft Government Response Statement to Recovery Strategy for the Chimney Swift in Ontario.” TRCA notes that as Ontario’s biodiversity continues to decline, more conservation efforts are needed for species at risk and their habitats and food sources, such as wetlands, to halt and reverse this decline. Please see our comments below and the main recommendations in bolded text.

Line	Section	Page Number	TRCA Detailed Comments
Chimney Swift - Ontario Government Response Statement			
151- 182	Government Led Actions	Pages 5-6	Since wetlands are a major source of insects (e.g., Chimney Swift food), TRCA asserts that protecting Chimney Swifts will require the protection and enhancement of wetlands.
183-230	Government Supported Actions - Focus area: Habitat Management	Page 7	<p>Action 2) ii) Ontario has lost at least 72% of its wetlands. The cumulative impacts of reduced wetland protections, including the protection of wetland complexes, where small areas are included within a larger complex, as well as increasing pesticide use in industrial agriculture and forestry practices, have caused a decline of aerial insectivores, including Chimney Swift.</p> <p>We further note that layered onto these threats are invasive species, including invasive Phragmites that results in wetland degradation, further contributing to the loss of insect production. Invasive species also likely play a significant role in forest health, where the regeneration and growth of native trees with the potential to contribute to Chimney Swift nesting and roosting habitat are being impacted by competition by invasive plants and pests. For example, in urban areas many forest understoreys are dominated by European buckthorn, autumn olive, invasive</p>

Line	Section	Page Number	TRCA Detailed Comments
			<p>honeysuckles and other invasive plants that outcompete the regeneration and growth of native trees, that have the potential to become large hollow trees suitable for Chimney Swifts. The inevitable invasion of Hemlock Woolly Adelgid is likely to significantly impact forest architecture, including stream headwaters, further contributing to forest health degradation and loss of natural and potential Chimney Swift habitat. TRCA is pleased that funding has been identified to combat invasive Phragmites, however, long-term, multi-year funding is required to achieve meaningful results.</p> <p>Recommendation: TRCA recommends that long-term, multi-year funding be identified to reverse the invasive species trend in forests and restore their overall health, which will benefit many species, including Chimney Swift.</p>
238-273	Government Supported Actions - Focus area: Research and Monitoring	Pages 8-9	<p>For Actions 5 and 7 - In addition to identifying and describing the key characteristics of natural nesting, roosting and foraging, and coordinating research into the direct and indirect links between climate change and severe weather and insect availability, actions should be taken to identify the threats to these habitats (e.g., invasive species and the synergistic effects of climate change and invasive species).</p> <p>Recommendation: The Ministry should identify the actions that can be taken to address these threats to Chimney Swift habitat.</p>
295- 313	Government Supported Actions - Focus area: Stewardship and Awareness	Pages 9-10	<p>In our experience, many landowners with existing habitats for Chimney Swift are unaware of swift activity in their chimneys and other human-made structures.</p> <p>Recommendation: TRCA recommends prioritizing both actions, as the time and cost associated with targeted outreach to the appropriate audiences is both time and cost effective with the potential to yield significant benefits to Chimney Swifts using human-made structures</p>

Should you have any questions, require clarification on any of the above, or wish to meet to discuss our remarks, please contact the undersigned at (416) 667-6290 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Anil Wijesooriya, Director, Restoration & Infrastructure

ATTACHMENT 5: TRCA-Correspondence-Bill-238-ERO-019-9467

January 22, 2025

POL-2024-00023
BY EMAIL ONLY
EMOPolicy@Ontario.ca

Emergency Management Policy and Governance Branch
Emergency Management Strategy, Monitoring and Intelligence Division
315 Front Street West
Toronto, ON M7A 0B8

**RE: ERO# 019-9467 Bill 238, Emergency Management Modernization Act, 2024:
Proposed amendments to the Emergency Management and Civil Protection Act**

Thank you for the opportunity to provide comments on Bill 238, Emergency Management Modernization Act, 2024: Proposed amendments to the Emergency Management and Civil Protection Act (EMCPA), posted by the Treasury Board Secretariat on the Environmental Registry of Ontario (ERO).

The responsibility for flood contingency planning has been established by the Province of Ontario and is shared by municipalities, conservation authorities (CAs), and the Ministry of Natural Resources (MNR), with each party playing a distinct role. Municipalities have the primary responsibility for the welfare of residents and are required to include flood emergency response in their municipal emergency planning. CAs, such as Toronto and Region Conservation Authority (TRCA), are responsible for operating a Flood Forecasting and Warning (FFW) Program. MNR provides FFW functions in areas where CAs do not exist, provides emergency services for municipalities in certain circumstances, and sets technical guidelines that CAs are required to follow.

TRCA's existing FFW program operates in accordance with Ontario Regulation 686/21: Mandatory Programs and Services and as set out in MNR Provincial Flood Forecasting and Warning Guidelines. The FFW program also supports municipalities in meeting their obligations under the EMCPA.

Government Proposal

It is TRCA's understanding that Bill 238 proposes amendments to the EMCPA to strengthen provincial leadership and coordination of emergency management and support enhanced community emergency management capacity. This proposed legislation prioritizes community-led approaches, helping municipalities design emergency management programs that reflect their unique needs and capacities. Additionally, the process for municipalities to declare local emergencies would be clarified, including procedures for emergency declarations and requests for assistance.

ATTACHMENT 5: TRCA-Correspondence-Bill-238-ERO-019-9467

General Comments and Recommendations

TRCA has reviewed the ERO posting and supporting materials, including Bill 238 Emergency Management Modernization Act, 2024 (currently ordered for Second Reading) and has the following comments and recommendations for consideration.

Under “MUNICIPAL EMERGENCY MANAGEMENT AND DECLARATION OF EMERGENCY”

Proposed Amendment 5, Joint program (2.1)

The possibility to develop joint programs and/or plans is a welcome addition as this can facilitate better use of resources and increase access to needed subject matter expertise, especially for smaller municipalities.

It may be beneficial to identify how a harmonized emergency management program between neighbouring municipalities should respond to an emergency that impacts multiple jurisdictions. It may also be beneficial to consider whether a mandatory approach is more appropriate for some elements of the emergency management program or plan, notably when harmonized actions may be required between neighbouring municipalities.

Proposed Amendment 7, Declaration of emergency 4 (1) and Preconditions 4 (2)

It is important that the Head of Council fully understands their role and responsibilities during emergencies. The decision to issue or not issue an emergency declaration could be strengthened by requiring the Head of Council to both consult their emergency plan and be required to receive a recommendation for emergency declaration from the lead or a member of the emergency management program.

We recommend adding 4 (2) (c) consulting with municipal emergency management professionals (or other qualified professionals).

Further, we recommend adding language to define expectations on how neighbouring municipalities within a joint program would issue an emergency declaration under a cross-boundary event distinct from a declaration under an individual jurisdiction emergency.

Under “PROVINCIAL EMERGENCY MANAGEMENT”

Proposed Amendment 10, Hazard and risk assessment and infrastructure identification 5.1 (2)

We recommend clarifying which hazard types are and are not covered in this Act. For example, many municipalities have declared climate emergencies, which may not require the same types and frequency of reporting.

ATTACHMENT 5: TRCA-Correspondence-Bill-238-ERO-019-9467

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc. (PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services

January 23, 2025

POL-2024-00020
BY EMAIL ONLY
planning.sez@ontario.ca

Ministry of Environment, Conservation and Parks
Ontario Parks – Southeast Parks Zone
300 Water Street, 4th Floor North
Peterborough, ON K9J 3C7

RE: ERO# 019-9209 Uxbridge Urban Provincial Park Preliminary Management Plan

Thank you for the opportunity to provide comments on the Uxbridge Urban Provincial Park Preliminary Management Plan. As a science-based watershed organization and major landowner in our jurisdiction, Toronto and Region Conservation Authority (TRCA) has an ongoing interest in management plans that protect lands for conservation and nature-based recreation. TRCA is providing comments to support the Ministry of Environment, Conservation and Parks (MECP) in the above noted provincial park initiative, given that TRCA is among the partners with the Province, the Regional Municipality of Durham, Township of Uxbridge, and others, who have established a Memorandum of Understanding (MOU) to create a new urban provincial park.

TRCA supports MECP efforts to expand protected areas in Ontario including the establishment of Uxbridge Urban Provincial Park (the Park) in July 2024 (ERO# 019-8618 and ERO# 019-7733). Further, we support Ontario Parks' current efforts to prepare a preliminary Management Plan to guide the Park's long-term protection, development and maintenance.

Government Proposal

TRCA understands that the [Provincial Parks and Conservation Reserves Act, 2006](#) requires the preparation of a management plan for any new protected area. MECP/Ontario Parks is seeking feedback on the draft policies of the Uxbridge Urban Provincial Park Preliminary Management Plan (the Plan). The Plan provides direction for the protection, development and management of the Park by establishing a guiding vision with objectives and setting policies for zoning, resource management, recreation management as well as park operation and development.

General Comments

- The Plan is succinct and easy to read. Many of the policies will be easy to apply to future lands incorporated into the Park boundary so that upon expansion, it appears that only minimal amendments would be required.

- Generally, the Plan’s land management approach is aligned with TRCA’s approach for our conservation areas, both active and passive. TRCA appreciates that although the Park is not within our watersheds, we are grateful for the opportunity to work with the Province, municipalities, and neighbouring conservation authorities to better steward these lands towards our shared objectives for natural and cultural heritage, biodiversity, and sustainable recreational use. The current lands that are part of the Park have environmental and/or public use connections to TRCA-stewarded lands.
- Further to the above, TRCA’s Board of Directors has agreed to transfer 39 parcels of TRCA-owned land in the Duffins Creek watershed (containing 1,545.66 hectares or 3,819.41 acres, more or less, of vacant land) to MECP for the expansion of the Park boundary. For more information, [a November 22, 2024 staff report to TRCA’s Board of Directors](#) speaks to this land transfer.

Detailed Comments

Further to the above, the following table consists of detailed comments on the Plan.

Uxbridge Urban Provincial Park Preliminary Management Plan	TRCA Comments and Recommendations
Section 3.2 Vision (page 7)	Suggest adding "and providing access to these lands" to "... enhancing ecosystem services."
Section 3.3 Life Science Representation (page 8)	It notes that the "park has a good level of diversity given its small size." TRCA suggests emphasizing the uniqueness of this as an Urban Provincial Park, and that the statement could still apply if/when the park boundary is expanded to include more land and therefore not necessarily small.
3.3 Recreation (page 10)	TRCA suggests adding trail running to the list of permitted activities. TRCA's Board of Directors Resolution #A 156/24 included the recommendation that Ontario Parks, "Protect and maintain existing trail systems in perpetuity to accommodate a range of trails for recreational and competitive activities, including but not limited to technical mountain biking, trail running, hiking, equestrian pursuits, and some areas with enhanced accessibility to foster inclusive use," so addition of trail running as a permitted activity may reduce changes required to the Plan once it is updated to reflect the addition of TRCA lands to be transferred to MECP for inclusion in the Park boundary.

Uxbridge Urban Provincial Park Preliminary Management Plan	TRCA Comments and Recommendations
3.3 Recreation (page 11)	Suggest adding another objective (or more than one objective) about locating recreational opportunities in areas with minimal negative environmental impact and improving the net environmental benefit of the park through sustainable trail development and management approaches.
4.2.2 Settler Cultural Heritage (page 15)	Black Creek Pioneer Village was re-named to The Village at Black Creek (VBC) in fall 2024. The Nesbitt milling building and mill are in the section of VBC in Vaughan. Suggest adding the location to this sentence, such as "... housed at The Village at Black Creek" in Vaughan.
4.3 Ecologically Sustainable Recreation (page 16)	Suggest adding "and areas for quiet contemplation and mindfulness such as forest bathing" to "... such as birdwatching"
5.0 Summary of Pressures (page 16)	Suggest adding encampments as an example of boundary encroachment and unauthorized activities. This is a significant issue in urban/peri-urban areas.
Figure 4 – Zoning (page 18)	Suggest re-naming "Access Zone" so it mirrors the discussion in Section 6.4 of the text
6.2 Natural Environment Zones (page 19)	Suggest replacing "via Wagg Road is not permitted." with "between Concession 6 and Regional Highway 47 is not permitted via Wagg Road."
7.1.4 Vegetation (page 23)	Suggest adding "and along interior paths of travel for species, such as trails" to "controlling invasive species within the park, including along the park boundary"
7.1.5 Insects and Disease (page 24)	Suggest replacing "minimal effects" with "minimal negative effects"
7.1.11.1 Acquisitions (page 28)	Suggest replacing "parcels of land" with "parcels of public land"
7.2.2 Trails (page 30)	Suggest revising text to "protect and maintain existing trail systems in perpetuity to accommodate a range of trails for recreational and competitive activities, including but not limited to technical mountain biking, trail running, hiking, equestrian pursuits, and some areas with enhanced accessibility to foster inclusive use" so consider

Uxbridge Urban Provincial Park Preliminary Management Plan	TRCA Comments and Recommendations
	adding "running" or adjusting "walking/hiking" to "walking/hiking/running" to accommodate that use.
7.3.1.3 Trails (page 34)	Suggest adding "accessibility for persons with exceptionalities" or "accessibility for people with disabilities and/or exceptionalities" to ". . . considering safety, use and maintenance feasibility . . ."

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Rob Baldwin, Chief Administrative Officer, Lake Simcoe Region Conservation
Laurie Nelson, Director, Policy Planning, TRCA
Richard Ubbens, Director, Conservation Parks & Lands, TRCA

ATTACHMENT 7: TRCA-Comments-7th-National-Biological-Diversity-Report

March 31, 2025

POL-2025-00038

VIA EMAIL

nature2030@ec.gc.ca

Environment and Climate Change Canada
Nature 2030 (ECCC)
867 Lakeshore Road
Burlington, ON L7S 1A1

RE: Comments on Canada's 7th National Report to the Convention on Biological Diversity

Thank you for the opportunity to contribute to Canada's 7th National Report to the Convention on Biological Diversity. The rapid loss of biodiversity is alarming, and we applaud and support the government's efforts to halt, reverse and restore ecosystems and the services they provide.

Since 1957, the Toronto and Region Conservation Authority (TRCA), as enabled through Ontario's Conservation Authorities Act, acts to enhance the natural environment in our jurisdiction and protect our land, water and communities from the impacts of flooding and increasingly extreme weather events, Ontario's leading cause of public emergencies. As the region's first line of defence against natural hazards, TRCA maintains vital infrastructure and provides programs and services that promote public health and safety, protecting people and property. TRCA mobilizes a science-based approach to provide sound policy advice, leveraging its position as a not-for-profit operating in the broader public sector to achieve collective impacts within our communities and across all levels of government.

The work of TRCA very much aligns with the National Biodiversity Strategy. We pursue applied research to better understand the current and potential future state of biodiversity and habitat in our jurisdiction in the face of a changing landscape and climate. We believe that biodiversity thrives when there is optimal habitat that provides the right environmental conditions and resources. This includes areas that are necessary for wildlife to carry out their life cycle needs such as feeding, moving, and reproducing. It is necessary to have a good quantity and quality of habitat to meet regional biodiversity needs. An ecosystem with high species diversity, including genetic species diversity, is better equipped to adapt to a wide variety of environmental conditions and disturbances.

Greater biodiversity also enriches our community by providing several critical ecosystem goods and services, including the purification of water and air, flood and

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erosion mitigation, food and medicine provision, cultural and recreational opportunities, and physical and mental health benefits.

Government Request for Input

TRCA understands that Environment and Climate Change Canada (ECCC) requested our input because TRCA previously provided comments on the development of Canada’s 2030 Nature Strategy, released in June 2024. Under the current request, ECCC is seeking information on efforts to conserve and sustainably use biodiversity in the form of responses to three sets of target-based questions, as we outline in the table below. The targets are from Annex 1 of the Nature Strategy. We also understand that this information will be used to inform the drafting of the 7th National Report to the Convention on Biological Diversity (2020 to 2025), and in some cases may appear as vignettes highlighting effective actions.

Question Set 1: What actions have you undertaken that have been particularly effective? What were their key outcomes? Were there any important factors in their success or effectiveness? Which targets do the actions described contribute to?

TRCA Responses

What actions have you undertaken that have been particularly effective?	What were their key outcomes?	Were there any important factors in their success or effectiveness?	Which targets do the actions described contribute to?
Developing collaborative watershed plans (Carruthers, Etobicoke, Humber) for TRCA's watersheds.	Watershed plans and the watershed conditions, scenario analyses, and management frameworks provided to partners and stakeholders with recommendations on actions needed to improve watershed health.	Resourcing, collaboration that leverages and integrates expertise of multiple disciplines and practitioners who work in the watersheds. Ongoing monitoring and follow-up on implementation and success of recommendations.	1, 3, 4, 6, 7, 8
Contributing data to Canadian Protected and Conserved Areas database.	Inclusion of several TRCA lands that count towards this target.	Collaboration with MECP and Ontario Nature	1
Developing and sharing future climate projections, risk and vulnerability assessments, and tools (e.g. Nature-based Solutions Siting Tool) with	Data and recommendations to inform science-based decision-making to identify priority areas for restoration, conservation and enhancement for	Resourcing, collaboration, leveraging, consideration of end user needs	1, 2, 3, 8, 11, 12, 14, 21

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What actions have you undertaken that have been particularly effective?	What were their key outcomes?	Were there any important factors in their success or effectiveness?	Which targets do the actions described contribute to?
partners and stakeholders.	implementation of nature-based solutions.		
Development of Road Ecology Program tools for the connectivity of wildlife and mitigation of wildlife - road mortality.	Road mitigation infrastructure implementation (monitoring, fencing, crossings) and strategic planning for wildlife connectivity.	Resourcing, collaboration, leveraging, consideration of end user needs	1, 3, 4, 8, 12, 14, 21
Development and refinement of Natural Heritage Systems and Water Resource Systems and recommended policy protections for municipal Official Plans and Secondary Plans.	Identification of priority areas for ecosystem protection, connectivity and restoration.	Science-based and strong engagement with municipalities	3
Large-scale, long-term inventory and monitoring of terrestrial and aquatic ecosystems.	Understanding of species distributions, ecosystem conditions, trends, and threats.	Sustainable funding for long-term assessments	3, 4, 6
Species at Risk (SAR) research, monitoring and habitat management (e.g. Redside dace and Jefferson salamander).	Better understanding of species lifecycle needs and population threats.	Academic collaborations and with Recovery teams	4
Invasive carp surveillance in Lake Ontario and Sea lamprey control in lower tributaries.	Early detection of invasive carp and removal of Sea lamprey.	Collaboration with DFO and other partners	6
Working with all levels of government to advance collaborative approaches to addressing pollution and ecosystem health issues through the Toronto and Region Remedial Action Plan and the Western Lake Ontario Land to Lake Initiative.	Identifying and acting on key priorities limiting water quality and ecosystem health within Lake Ontario.	Collaboration through science-based decision-making	7

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What actions have you undertaken that have been particularly effective?	What were their key outcomes?	Were there any important factors in their success or effectiveness?	Which targets do the actions described contribute to?
Participating in binational collaborations with the Lake Ontario Partnership Executive Committee and Working Groups to advance priority actions.	Development and updates to the Lakewide Action and Management Plan for Lake Ontario, CSMI, and annual reporting.	Binational participation from all levels of government in the US and Canada	7
Work with municipalities to identify, quantify, and value ecosystem services and benefits within TRCA's jurisdiction, and incorporate natural assets into TRCA and municipal Asset Management Plans.	Helping municipalities understand and communicate the value of ecosystem services within their jurisdictions and build the budget case for management support.	Building and sharing expertise in this emerging field	11, 14
Developed on-line interactive platform with dashboards that convey watershed and ecosystem targets, conditions, and trends based on current data analyses.	Knowledge sharing with staff, our Board of Directors, partner municipalities, and the public to inform decision-making.	Resourcing, new technology, engagement with end users, ongoing maintenance	21
Including First Nations and Indigenous communities in the development and implementation our shared watershed plans. We are also exploring opportunities for access into employment through job fairs, training, procurement policies, and other avenues.	Stronger relationships with Indigenous peoples built on trust and mutually shared conservation goals and priorities. Helping to build capacity for Indigenous ecological governance.	Time, space, and openness to building these relationships, offering capacity funding	22
Restoration, resource management and stewardship (over 450 ha in 2024 as an example) including meadow, forest, wetland, riverside and stream restoration as well as invasive species management.	Restoring and maintaining healthy and resilient watershed ecosystems in face of urbanization and changing climate.	Skilled staff and volunteers	2, 3, 4, 6, 9

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What actions have you undertaken that have been particularly effective?	What were their key outcomes?	Were there any important factors in their success or effectiveness?	Which targets do the actions described contribute to?
Balance development and growth to protect the natural environment ensuring sustainable development. TRCA issues over 1,000 development and infrastructure permits annually.	Permitting process has prevented or mitigated construction in flood or erosion-prone areas and ensured proper protection of wetlands, valley and stream corridors and Lake Ontario shoreline. Efforts contribute to flood mitigation and support biodiversity and improve resilience of natural landscapes.	Good relationships and partnerships with municipalities requiring landowners to consult with TRCA and obtain permits in regulated areas. Good mapping data of regulated natural hazards and natural features.	1, 2, 3, 14, 20, 21
Assisted partner municipalities to integrate green infrastructure and provide proven models for enhancing stormwater management and green aspects of communities.	Boosted biodiversity and built healthier, more resilient communities within urban and urbanizing landscapes.	Collaboration, innovation and building and sharing expertise, new technologies	14, 21
Completed adaptive management across 151ha of meadow and mown buffer areas in the Meadoway Project .	Restored areas that flourished with pollinators and wildlife, increasing biodiversity and enhancing species richness. Connected urban communities to nature and greenspace.	Skilled staff and volunteers	2, 3, 4, 6, 9, 12
Hosted events during Bird, Butterfly and Salmon festivals at TRCA Tommy Thompson Park in Toronto.	Celebrated biodiversity and inspire communities to take environmental action.	Public participation and engagement, capacity building	20

Question Set 2: What were the biggest challenges you faced in making progress in 2020-2025 time period? Are these challenges specific to one or more targets?

What were the biggest challenges you faced in making progress in 2020-2025 time period?	Are these challenges specific to one or more targets?
Sustainable long-term resourcing of research, monitoring, implementation of science-based tools, and understanding efficacy of on-the-groundwork.	All

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Policy constraints and limited funding availability related to the protection of sensitive species (e.g., species at risk) and their supporting habitats (e.g., wetlands, meadows, forests, streams).	1,3, 4
Sometimes a lack of deserved recognition of the importance of the environment in meeting the housing affordability crisis and streamlining development and infrastructure approvals, to grow resilient communities in a sustainable way. Land use change is a key biodiversity stressor, and recent provincial legislative changes have restricted conservation authorities from providing comments to planning approval authorities explicit to ecological functions in the planning and environmental assessment processes.	All
Increase in the use of Minister’s Zoning Orders to override the local planning process to fast-track development projects. The MZO process is less likely to allow for early and comprehensive review to determine how best to avoid, mitigate and compensate for biodiversity loss.	All
Limited understanding and/or interest in advancing / implementing initiatives that extend beyond specific administrative boundaries due to operational mandates; natural system management for full benefit requires a systems approach that spans political and administrative boundaries.	All

Question Set 3: Are there any future areas or approaches you may explore, based on lessons learned to date? Are these areas specific to one or more targets?

Are there any future areas or approaches you may explore, based on lessons learned?	Are these areas specific to one or more targets?
Possibly some greater collaboration may yield additional successes, but these have been largely leveraged. The availability of resources will ultimately drive future work.	All

Thank you again for this opportunity to contribute to Canada’s 7th National Report to the Convention on Biological Diversity. We hope ECCC will continue to engage with TRCA, especially as it relates to implementation tools given our experience across federal, provincial and local policy frameworks, our on-the-ground biodiversity initiatives, and scientific expertise in the natural systems of our watersheds.

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Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at (437) 880-2299 or at maryann.burns@trca.ca.

Sincerely,

Original Signed by -

Mary-Ann Burns, MCIP, RPP
Senior Manager, Planning Policy & Regulation

Cc: John MacKenzie, Chief Executive Officer
Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services
Anil Wijesooriya, Director, Restoration and Infrastructure

May 14, 2025

POL-2025-00043

VIA EMAIL

SpecialEconomicZones@Ontario.ca

Ministry of Economic Development, Job Creation and Trade
College Park
777 Bay Street, 18th Floor
Toronto, ON M5G 2N4

Re: ERO# 025-0391 Special Economic Zones Act, 2025 (Schedule 9, Bill 5)

Thank you for the opportunity to comment on the Ministry of Economic Development, Job Creation and Trade Environmental Registry of Ontario (ERO) posting, “Special Economic Zones Act” being proposed under Schedule 9 of Bill 5. The Act would come into effect on Royal Assent of the Bill, “Protect Ontario by Unleashing Our Economy Act, 2025”.

Government Proposal

The Ministry of Economic Development, Job Creation and Trade is proposing a new law called the Special Economic Zones Act, 2025. If approved, the Ontario government will be able to designate special areas that are critical to Ontario’s economy and security, where selected projects could move faster because of simplified rules, faster approvals, and one-window access to services.

The Special Economic Zones Act, 2025 would grant regulation-making authority to designate zones if certain criteria are met. A zone will be a geographic area that could include one or more projects of critical or strategic importance. Zones could vary significantly in size, from a small parcel of land to a large area. The zones are intended to enable faster permitting, streamlining some permits and approvals, simplified requirements and priority access to one-window services for vetted projects and trusted proponents. The enabling regulations would also identify which regulations, permits, processes, approvals and similar requirements will be exempted, altered or continue to apply.

General Comments

Based on TRCA’s local expertise and collaborative, streamlined work with our partners, we provide the following comments and recommendations.

Support for Streamlining and Efficiency

With the most highly urbanized and urbanizing watersheds in the Province, Toronto and Region Conservation Authority (TRCA) recognizes the importance of efficiency, certainty, transparency and accountability in planning and permitting review processes so that development and infrastructure projects can occur in a timely manner. TRCA works in

collaboration with our regional and local municipalities, the building industry, provincial ministries, agencies and stakeholders to advance a coordinated review and approval process. At the same time, TRCA fulfills its mandatory responsibilities under the Clean Water Act, and to protect people and property from the risks related to natural hazards within its jurisdiction in accordance with the Conservation Authorities Act (CA Act) and associated regulations.

TRCA permit applications are reviewed by TRCA staff with specialized technical expertise and decisions are based on the most current technical information, watershed and subwatershed conditions, and local planning context. An integrated view is taken to identify and protect regulated features and functions important for natural hazard management, and to avoid, minimize and mitigate impacts upstream and downstream, cumulative impacts, and risks to people and property. Permit decisions are transparent and consistent with Board approved policies that align with provincial policies and conform to the requirements of the CA Act and associated regulations.

We have a long history in successfully collaborating and coordinating on major planning and permit applications to avoid potential conflict or delay in the approval process. For instance, TRCA meets regularly with municipal partners and the Building Industry and Land Development Association (BILD) and has received positive feedback on TRCA's commitment to excellence in service delivery. TRCA is also continuing to engage municipalities and BILD on our recently implemented software that provides more streamlined and transparent planning and permit review and project timeline tracking.

Protecting Public Health and Safety Supports Economic Prosperity

Avoiding hazardous lands for development is a wise practice that supports economic prosperity. This practice builds more resilient communities by minimizing property damage, business closures and disruption of critical public infrastructure caused by flooding. TRCA supports this proactive approach and works closely with our partner municipalities and public infrastructure providers to maintain the natural and beneficial function of flood plains and wetlands to protect public health and safety in a changing climate.

Protecting drinking water sources from Ontario lakes, rivers, streams or underground is critical to economic prosperity. All these sources are linked in a watershed through the water cycle. TRCA works with our partner municipalities to develop and implement watershed plans and source protection plans to reduce threats and protect drinking water sources.

Recommendations

1. TRCA recommends that the Province establish a technical committee of stakeholders, including representatives from conservation authorities, to advise the Minister on:
 - identifying criteria for the location of special economic zones,
 - evaluating the potential zones against those criteria,
 - providing critical natural hazard and source protection data for the projects within the zones; and
 - review and permitting of projects.

TRCA scientific teams can provide technical expertise for a rapid response to assist the Province in this endeavour, including specialists in environmental planning, water resource engineering, geotechnical engineering, hydrogeology and ecology. This team could be part of the one-window process to ensure full coordination and ensure streamlining at an early stage.

2. Notwithstanding the above, given the risk to public health and safety from natural hazards and the growing risks from climate change and extreme weather events, TRCA recommends that the Provincial Planning Statement natural hazard policies, the Conservation Authorities Act permitting requirements and source protection plans under the Clean Water Act continue to apply in a Special Economic Zone.
3. If there are proposals of Provincial economic significance in TRCA's watershed jurisdiction, TRCA would be pleased to work with the Province as part of an inter-agency team to provide our best technical and policy advice on securing timely approvals taking into account our provincially mandated role. TRCA has a proven track record of success in working with municipal, provincial and federal agencies and private sector applicants to realize major economic development approvals (Caledon Employment Areas, Vaughan Enterprise Zone, Toronto Waterfront, Seaton Employment Lands, etc.) and we would be prepared to be part of any future coordinated provincial and municipal efforts irrespective of this proposed legislation.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services

May 14, 2025

POL-2025-00042
VIA EMAIL
ESAREg@ontario.ca

Public Input Coordinator- Species at Risk Protection
Species at Risk Branch
40 St Clair Avenue West
Toronto, ON M4V1M2

Re: Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025 (ERO 025-0380)

Thank you for the opportunity to provide comments on the, “Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025” posted on the Environmental Registry of Ontario (ERO) by the Ministry of Environment, Conservation and Parks (MECP).

Toronto and Region Conservation Authority (TRCA) previously commented on the “Regulatory changes under the Endangered Species Act to improve implementation of the species at risk program” (ERO 019-8016), posted to the ERO, on February 20, 2024 and on “Developing government response statements for three species at risk under the Endangered Species Act, 2007” (ERO 019-9257), posted to the ERO, on January 20, 2025.

TRCA continues to support our provincial and municipal partners in the research and science of protecting and recovering species at risk in Ontario, through our mandate under the Conservation Authorities Act and associated regulations. Our comments are informed by TRCA’s technical expertise in terrestrial and aquatic ecology and our ongoing monitoring, research, and ecological restoration projects.

Government Proposal

Species at risk and their associated habitats are protected in Ontario under the Endangered Species Act, 2007 (ESA). Information and policy guidance is developed to support the protection and recovery of a species once it is listed as endangered or threatened. With the input of external organizations, recovery strategies are then finalized, and the Province develops a government response statement for each recovery strategy.

Currently, MECP is proposing amendments to the ESA under Schedule 2 of Bill 5, “Protect Ontario by Unleashing our Economy Act, 2025”. The changes being proposed to its current approach to project approvals are intended to, “help speed up project timelines and provide greater certainty for proponents, while protecting

species.” The proposal is to make immediate amendments to the ESA and later repeal the ESA and enact the new “Species Conservation Act” once proclaimed.

The proposed changes would:

- Shift nearly all species-related authorizations to a registration-first approach. Under the proposed new approach, instead of waiting for the ministry to approve permits, most proponents will be able to begin an activity immediately after registering.
- Establish a framework for proponents to follow, ones that are focused on those activities that are most likely to have a direct negative impact on species.
- Establish a new Species Conservation Program to support voluntary initiatives like habitat restoration.
- Enforce species protection laws to ensure that all proponents comply with the rules and expectations of this new approach.
- Section 1 (purpose) of the ESA would be updated to consider social and economic considerations, including the need for sustainable economic growth in Ontario.

The ERO posting provides an overview of the main areas of change to the ESA framework, including: Species Classification and Listings, Removal of Recovery Plans and Documents, New Species Conservation Program, Updated Compliance and Enforcement, Redefining Protections, Registration-first Approach, Reduced Duplication with Federal Legislation, and others.

TRCA General Comments

This proposal presents a welcome opportunity to streamline and improve efficiencies and effectiveness of the Species at Risk (SAR) legislative and regulatory framework. TRCA supports the re-focusing of resources to not only speed up approval timelines but also to optimize benefits for SAR needed to halt and reverse the decline in biodiversity in Ontario. New and intensifying development and infrastructure expansion, particularly in urban and urbanizing TRCA watersheds, highlight the importance of species habitat protection towards maintaining and enhancing ecosystem services needed for growing communities.

Outside of the intrinsic value of species, SAR play a crucial role in maintaining healthy ecosystems, such as through pollination, seed dispersal, and nutrient cycling. They also provide many, often unnoticed, ecosystem services such as predation (e.g., controlling pest populations), carcass removal (e.g., scavengers) and controlling disease vectors (e.g., frogs consuming mosquito larva or birds and bats feeding on adult mosquitoes). In addition to these ecosystem services, SAR are integral to many other parts of our lives, such as recreation (e.g., birding, hiking) and culture (e.g., symbolism, medicinal, spiritual).

Moreover, SAR habitats are contained in natural features important for the management of natural hazards and require protection or restoration to avoid, mitigate and compensate for the impacts of urbanization and climate change.

Therefore, with an increase in development and infrastructure plans and projects, comes a heightened need for protection of these habitats that jointly benefit people and ecosystems.

Please find below our detailed comments on some of the proposed legislative amendments as described in the ERO posting, including recommendations based on TRCA’s experience and technical expertise.

Proposed	TRCA Detailed Comments
Purpose	<p>While TRCA supports improving the efficiency and the effectiveness of the ESA approval process, there is concern that the proposed changes to the ESA legislative framework are being loosened too far to the detriment of SAR. The shift from authorization to registration eliminates proactive protection through the review process and instead requires an after the fact response. For example, once registration occurs and the works immediately commence, actions that are inconsistent with the rules and exemptions cannot be reversed, regardless of compliance order powers. This could result in irreversible impacts to species or habitat significantly undermining species protection efforts, particularly for those species most vulnerable or at greatest risk of extinction.</p> <p>A registration-first approach offers efficiencies in regulatory oversight along with a streamlined approach for proponents. To balance the opportunities with the challenges in implementing the registration-first approach, please consider lessons learned from the registration approach currently in place. Challenges include lack of comprehensive and current data on SAR, re, habitat presence, and lack of clear direction for, or onus on, proponents to undertake comprehensive site screenings and to fill data gaps.</p> <p>TRCA recommends that the registration-first approach clearly identify higher risk activities and include clear instructions and requirements to undertake background studies and undertake necessary field work to ensure that species and habitat are identified and accounted for in project planning and implementation. Further, efforts from the Province to ensure up-to-date SAR data are made available to the public along with clear direction (e.g., survey protocols) is required to inform identification of species presence.</p>
Species Classification and Listing	<p>Designating species on SAR lists should be science-based. Given the extensive expertise and evidence-based nature of COSSARO, the advice of COSSARO should be weighed heavily, if not relied on completely, for listing species for protection. This would maintain</p>

Proposed	TRCA Detailed Comments
	<p>consistency in decision making, ensuring a more reliable process, and reduce unexpected changes.</p> <p>TRCA recommends that the COSSARO retain independent decision making from the government. If the proposal for the Minister to have discretion to add or remove species from the Species at Risk in Ontario List goes forward, clear and transparent scientific rationale and criteria should be established as a prerequisite for making these decisions.</p>
<p>Removal of Recovery Plans and Documents</p>	<p>The stated goal of removing the requirement for the government to develop recovery products for species is to “enable a more flexible approach”. This could have the unintended consequence of undermining the Province’s goal of providing more certainty for proponents since there will no longer be science-based, committee-led direction of what’s needed for species recovery. For example, with the removal of recovery strategies, response statements and review of progress in the success of recovering species it is unclear how success will be determined or how adaptive management can inform updates to the new framework’s implementation.</p> <p>TRCA recommends that science-based measures for monitoring success and triggers/criteria for responding to shortcomings should be incorporated into the new Act and supporting regulations. Partnerships with academia, environmental organizations and industry representatives could offer a science-based approach to the development of recovery documents while helping to address resourcing pressures.</p>
<p>New Species Conservation Program</p>	<p>A positive change proposed is the stated intention to “increase investment in supporting voluntary activities that will assist in the protection and conservation of species by more than four times, up to \$20 million per year.”</p> <p>Through the proposed Species Conservation Program, and given eligibility for funding, conservation authorities, including TRCA, are a willing partner in habitat restoration projects with municipalities and others aligned with provincial species protection and conservation goals.</p>

Proposed	TRCA Detailed Comments
<p>Updated Compliance and Enforcement</p>	<p>While the proposed updated compliance and enforcement model, including mitigation and compliance orders, is positive, shifting from authorization to registration will lead to significant strain on limited enforcement and inspection resources. Greater enforcement presence and reinvestment of existing staff resources towards monitoring registry activities would improve accountability and help improve successful outcomes for SAR.</p> <p>TRCA recommends that where regulatory oversight and administration of the Act is shifted to enforcement and inspection activities, that the Province develop a clear strategy that allocates staff resources to monitoring of registration activities and providing proponent support. This should be concurrent with increasing enforcement capacity to monitor and inspect registered activities. This strategy should be developed with public input alongside the anticipated release of the Species Conservation Act.</p> <p>It is unclear how the effect of cumulative impacts will be monitored, assessed and responded to. The proposed registration system as described in the posting would focus on a single site and project without any knowledge of other potential impacts in the area. As an example, stormwater management ponds can have a significant impact on habitat quality. Multiple stormwater outlets in close proximity could severely undermine terrestrial and aquatic habitat quality and endangered species protections, while registrants would likely only have knowledge of the single outfall associated with their project.</p> <p>TRCA recommends that criteria and responsibility for assessing cumulative impacts should be clearly outlined and incorporated into the Act and should be overseen by expert government staff.</p>

Proposed	TRCA Detailed Comments
<p>Redefining Protections</p>	<p>One of the proposed changes is to remove the concept of “harassing” a species from SAR protections. Harassing species could substantially impact their breeding viability on a local level. Species harassment is a common threat to a variety of SAR, particularly bird species. In addition, a proponent could engage in harassment to legally remove an endangered species from a plot of land to facilitate development, and this type of activity should be prevented.</p> <p>TRCA recommends that protection from species harassment be carried over into the new framework.</p> <p>The proposed revised habitat definition is a concern given that it does not recognize the ecosystem connectivity and function integral to habitats. The habitat definition as proposed would remove the protections associated with migratory and foraging habitats, which greatly impacts species who are already threatened due to habitat loss. Areas required for feeding and foraging necessary for species survival are not in the revised definition, nor are areas that species require for movement (e.g., corridors connecting a forest and a wetland for frogs). In the absence of protection for these habitat components, species persistence is not secured.</p> <p>Another example is that vascular plant definitions are localized to just species themselves suggesting that a localized plant and its root zone are the only parts required for survival. This should be revised to include the surrounding area which, if removed, would drastically reduce chances of survival and health of species. The landscape-scale factors that support a habitat, such as structure, shade, soil moisture, temperature, and exposure to winds, are not taken into account.</p> <p>Including a buffer around dwelling sites in the habitat definition would limit moisture loss to sun exposure and erosion due to removal of neighbouring vegetation; it would also limit damage from direct exposure to precipitation and wind, and provide shade needed to ensure habitable temperatures for the animal or plant protected by the Act.</p> <p>TRCA recommends that migration and feeding habitats be maintained in the habitat definition and further that a buffer area around the dwelling place and/or critical root zone be added to ensure the integrity of the microclimate that makes the habitat suitable.</p>

Proposed	TRCA Detailed Comments
Reduced Duplication with Federal Legislation	<p>It is understood that under the proposal, requirements for migratory birds and aquatic species that receive protection under the federal <u>Species at Risk Act (SARA)</u> will no longer receive protection under the new SAR framework to avoid duplication. It is possible that this will reduce duplication in the current system by relieving the administrative burden on low-risk projects and species monitoring projects and programs. A concern, however, is that since the federal Act assesses species at the national level, a species could presumably be removed from the Ontario list because it is listed in SARA, and then potentially removed from SARA if the species recovers in provinces other than Ontario.</p> <p>TRCA recommends that as part of the new provincial SAR framework, review of the specific federal habitat definitions and species protections be undertaken to clearly demonstrate that federal requirements adequately address the needs of species in the Ontario context.</p>

TRCA further understands that details on the framework such as the rules for registration and exemptions are to be set out later in regulation. We look forward to the government's consultation on the regulations prior to their finalization.

TRCA can provide science-based input and assist in finding technical solutions to address potential risks and capture opportunities for efficiencies and balancing priorities.

To support the shared goals of streamlining approvals and supporting species recovery efforts, TRCA recommends a risk-based approach to SAR protections and authorizations.

If the Province's proposed new framework was revised to a self-screening and triage process, similar to that applied to federal Fisheries Act authorizations, it could allow for efficient screening of low-risk projects best suited for a registry. This approach would entail a more comprehensive review and/or more stringent rules in regulation reserved for those projects with greatest risk to species recovery efforts. This could offer more certainty for proponents, allow for efficiencies in allocation of existing staff resources, and ensure provincial oversight is maintained.

Should you have any questions, require clarification on any of the above, or wish to meet to discuss our remarks, please contact the undersigned at (416) 667-6290 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP
Chief Executive Officer

Cc: Laurie Nelson, Director, Policy Planning
Sameer Dhalla, Director, Development and Engineering Services
Anil Wijesooriya, Director, Restoration & Infrastructure

May 16, 2025

POL-2025-00044

VIA EMAIL

heritage.consultation@ontario.ca

Ministry of Citizenship and Multiculturalism
Heritage Policy and Programs
400 University Avenue 5th Floor
Toronto, ON M7A 2R9

Re: ERO# 025-0418 Proposed Amendments to the Ontario Heritage Act

Thank you for the opportunity to comment on the Ministry of Citizenship and Multiculturalism (MCM) Environmental Registry of Ontario (ERO) posting proposing amendments to the Ontario Heritage Act (OHA) under Schedule 7 of Bill 5, Protect Ontario by Unleashing our Economy Act, 2025.

Toronto and Region Conservation Authority (TRCA) is a major landowner within the Greater Toronto Area. The unique riverine association of the majority of TRCA lands provides great potential for holding archaeological resources. To date, approximately 1,200 acres of TRCA property have been examined for archaeological sites and more than 100 sites have been located.

Occasionally, public infrastructure providers require the use of TRCA-owned or managed lands. TRCA ensures that an archaeological assessment is conducted on any TRCA property proposed for ground disturbance. The goal of TRCA's Archaeological Heritage Resource Management Program is to manage the archaeological resources found on TRCA lands consistent with legislative requirements and approved technical practices, and with guidance from culturally descendant communities whenever possible.

TRCA's in-house licensed archaeologists regularly communicate two-way information with the modern descendant communities of the people who occupied these past site locations, particularly when there is the need to investigate a site during an archaeological assessment. For the archaeological resources on TRCA-owned or managed lands, TRCA archaeologists follow the protocols for Indigenous engagement set out in Ontario's Standards and Guidelines for Consultant Archaeologists. TRCA has also formulated its own Engagement Guidelines to obtain guidance on stewardship and management decisions within the archaeological assessment process and other land management processes.

Government Proposal

TRCA understands that MCM is proposing to make legislative amendments to the OHA to update enforcement and compliance with respect to the protection of artifacts and archaeological sites. Where it could potentially advance certain provincial priorities (transit, housing, health and long-term care, other infrastructure, and others as may be prescribed), the amendments would allow for the exemption from archaeological requirements. We further understand that MCM plans to consult separately on potential criteria for exemptions.

TRCA Comments and Recommendations

Based on TRCA’s local expertise and experience for its landholdings as noted above, the following comments and recommendations are provided on the proposed amendments as described in the ERO posting.

Proposed Amendments	TRCA Comments and Recommendations
Establish an authority for the Minister to order an archaeological assessment to be undertaken and expand existing inspection authorities	This could be a useful tool in protecting archaeological sites from destruction. Known archaeological sites have been destroyed due to issues such as archaeologists’ lack of funds to finish excavation, poor archaeological techniques, or time constraints imposed by landowners. TRCA supports the expansion of provincial inspection authority to ensure sites are properly excavated and artifacts collected.
Enhancing powers to seize and direct artifacts and archaeological collections	Artifacts are currently the responsibility of the licensed archaeologist. This can be onerous for the archaeologist and does not ensure artifacts are properly cared for or accessible to researchers or First Nations. TRCA supports enhanced provincial powers to direct archaeological resources contingent on artifacts being kept in appropriately designed repositories (whether public or with First Nations) for preservation and access.
Exemption for properties subject to archaeological assessment where it could advance provincial priorities such as transit and other infrastructure	TRCA is concerned that this amendment would enable large properties or swaths of land to be exempt due to such large-scale projects being exempted. TRCA works with proponents efficiently to facilitate archaeological assessments and submit them for Ministry approval. We note that the ERO posting states that examples of where a property might not be considered for an exemption could include former Indian Residential School sites, burials and significant archaeological sites. While these are valid exceptions, to be

Proposed Amendments	TRCA Comments and Recommendations
	<p>ineligible for exemptions, a site would need to have its archaeological significance already known. This leaves sites with unknown archaeological significance vulnerable to exemption and impact.</p> <p>TRCA recommends that this aspect of the amendments be reconsidered and looks forward to consulting on the exemption criteria to assist in avoiding potential for impacts to unidentified sites with potential for archaeological significance.</p>

In addition to the above comments on the amendments to OHA, some First Nations have expressed to TRCA that they are not satisfied with how archaeological assessments are undertaken in Ontario, particularly due to their lack of engagement in archaeological assessments and associated recommendations. Moreover, First Nations conveyed to TRCA their dismay that they were not included in the creation of the Standards and Guidelines for Consultant Archaeologists.

In the spirit of reconciliation and relationship building, TRCA recommends the Province engage First Nations and Indigenous communities on the amendments and criteria for exemptions while considering any potential implications to their culture, heritage and contemporary interests. We would be pleased to share our experience with archaeological assessments on our own lands to assist in expediting archaeological assessment approvals with the Province, stakeholders and First Nations.

Lastly, we would like to highlight the opportunity for TRCA to work more closely with the Province to conduct archaeological work for infrastructure proposals on and around TRCA-owned and managed lands identified by the Province. This would help understand, for future infrastructure, whether archaeological resources are present and to inform future archaeological work and engagements with First Nations (e.g., proposed alignments for Highway 413).

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original signed by>

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