

MM31.12_ Federal Environmental Assessment of the Ontario Line,_Submission_Lenka Holubec

Apr 7, 2021

VIA E-MAIL: councilmeeting@toronto.ca

RE: MM31.12 Federal Environmental Assessment of the Ontario Line - by Councillor Paula Fletcher, seconded by Councillor Joe Cressy

Dear Mayor Tory and Council Members,

Thank you for this opportunity to comment on the motion by Councillor Paula Fletcher, seconded by Councillor Joe Cressy.

This communication is in support of the motion.

I would also like to add to the voices requesting the federal government do an environmental assessment of the proposed Ontario Line.

Additionally to reasons specified in this motion, **Ontario Line North as proposed now, would be crossing or in adjacency of a significant natural heritage systems located at Don River Valley - parallel to Millwood Road and in vicinity of Overlea Boulevard and Don Mills Road (E.T. Seton Park ESA).**

The areas located within the Ontario Line North Study Area that potentially could be affected:

- The Candidate Regionally Significant West Don River Valley Life Science ANSI
- The Don River Valley is a valleyland feature designated as an Urban River Valley under the Greenbelt Plan
- Environmentally Significant Area within E.T. Seton Park. TO's ESAs are protected along City OP amendment OPA 262 in conformity with Provincial Policy Statement.
- The natural areas within the Don river which are part of the City Natural Heritage System

Bill 171 – “An Act to enact the Building Transit Faster Act, 2020 and make related amendments to other Acts” allows ‘early works’ construction for the project to commence even before the release of EIA which not just removes public from decision making process but completely fails to provide for due process of evaluation where significant natural heritage is involved.

“Early works are components of the Ontario Line Project that are anticipated to be ready to proceed before completion of the Environmental Impact Assessment Report, such as station construction, rail corridor expansion, utility relocation or bridge replacement or expansion, as defined in **O. Reg. 341/20**”

<https://www.metrolinxengage.com/en/content/ontario-line-environment>

Requesting the federal government do an environmental assessment of the proposed Ontario Line is critical to prevent irreversible impacts potentially resulting from streamlined Metrolinx Assessment process and to ensure continued protection and sustainability of Toronto's natural heritage.

Thank you for your attention to these considerations.

Sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

Support material:

1. OPA 262, BY-LAW No. -2015 To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas <https://www.toronto.ca/legdocs/bills/2015/bill1173.pdf>

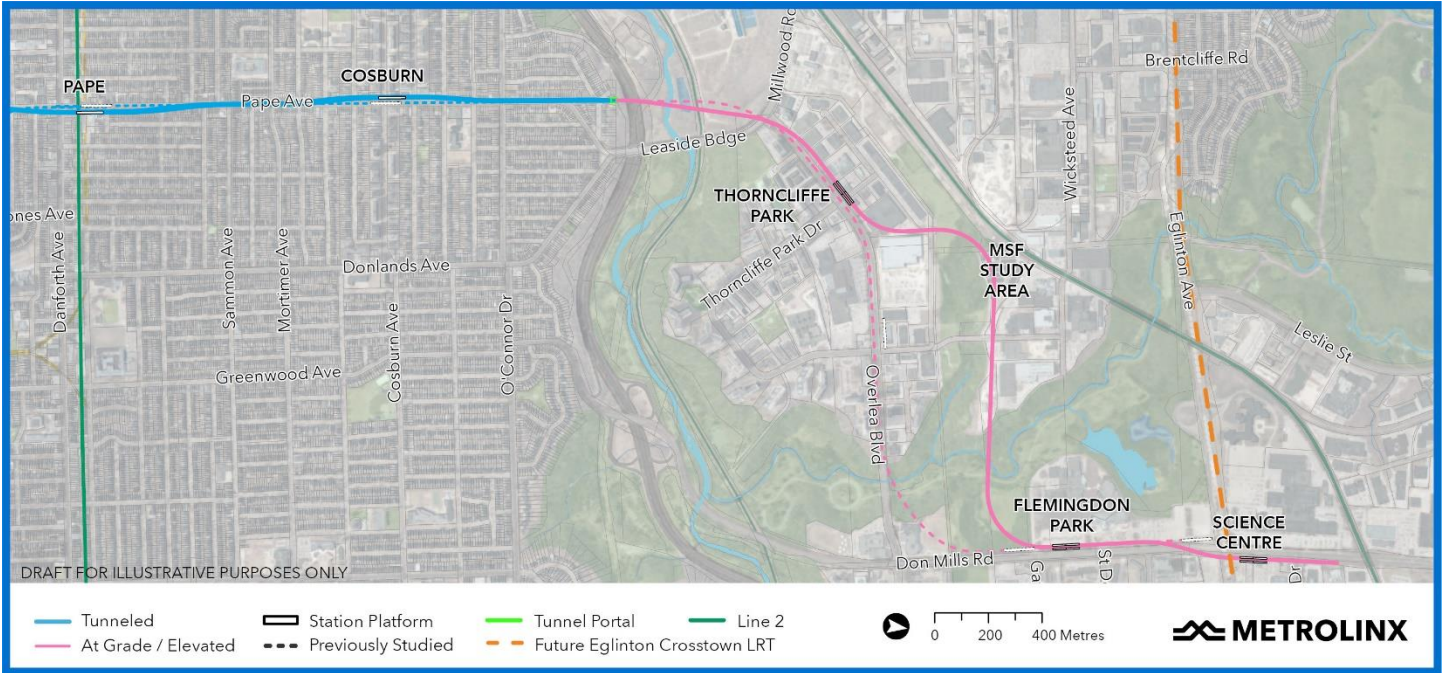
So that the amended section reads as follows:

"Development or site alteration, with the exception of trails, where appropriate, and conservation, flood and erosion control projects, is not permitted on lands within the natural heritage system that exhibit any of these characteristics. Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas. New or expanding infrastructure should be avoided unless there is no reasonable alternative, adverse impacts are minimized and natural features and ecological functions are restored or enhanced where feasible. An impact study, as referred to in Policy 12, will be required for any proposed undertaking in those areas not already the subject of an Environmental Assessment under the Environmental Assessment Act.

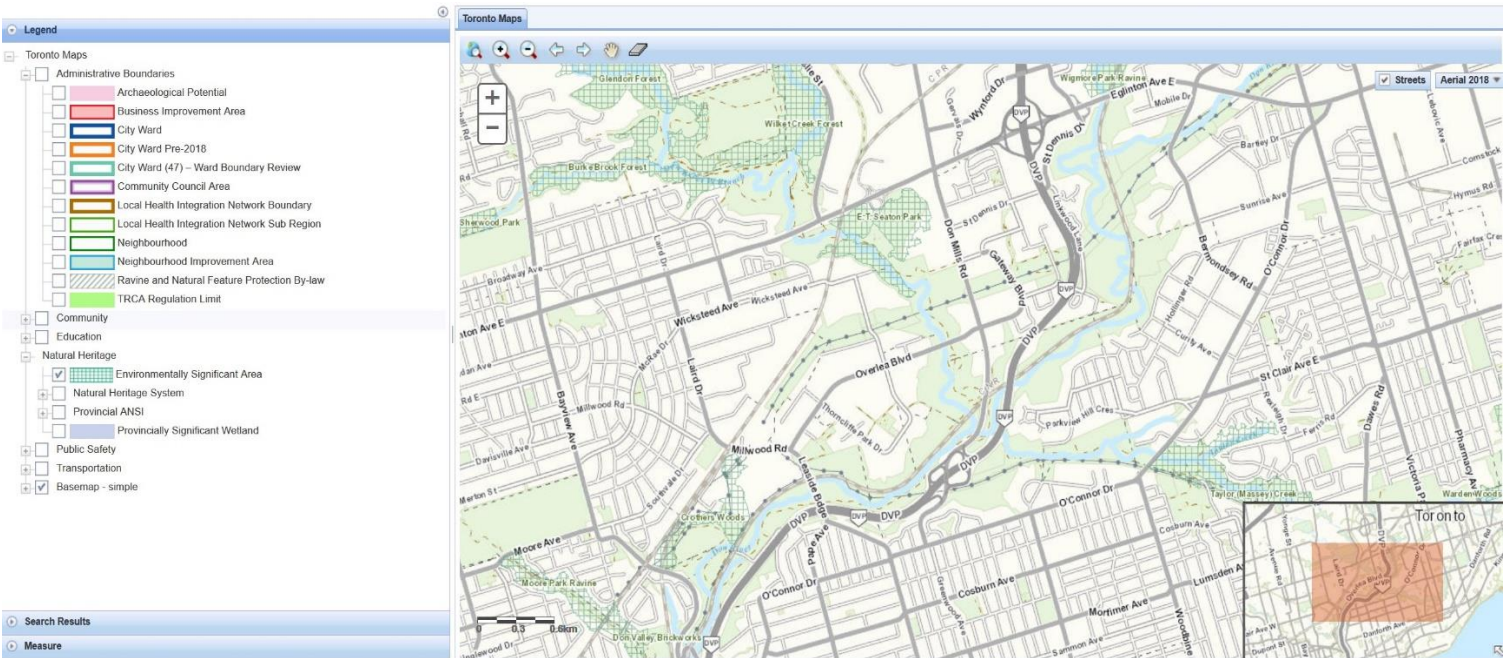
Known areas exhibiting these environmentally significant characteristics are shown on Map 12A. Where these areas extend onto lands above the top of bank which have underlying zoning permissions, the lands may be used to calculate permissible density in the zoning bylaw. An impact study, as referred to in policy 12, will be required for any proposed development adjacent to these areas. Any proposed development will avoid these areas, minimize negative impacts and, when possible, restore and enhance the ecological functions attributed to these areas.

OPA 262 CITY OF TORONTO BY-LAW No. 1158-2015 To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas.

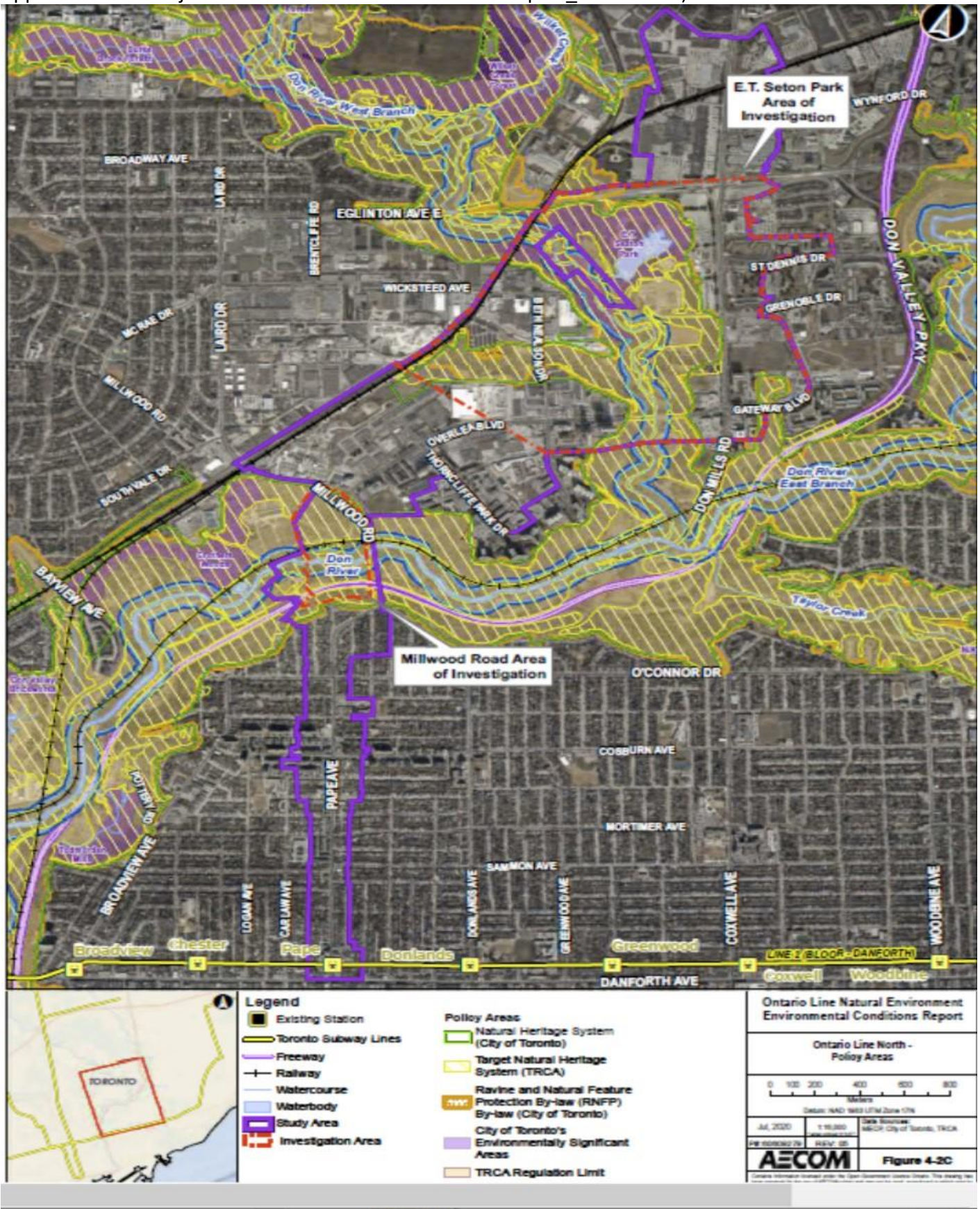
2. Ontario Line North



3. City Interactive Map http://map.toronto.ca/maps/map.jsp?app=TorontoMaps_v2 indicating natural heritage, ESAs



4. Appendix B1 OL Project Final Environmental Conditions Report_2020-11-30)



5. Appendix B1 OL Project Final Environmental Conditions Report_2020-11-30)

Natural Environment Environmental Conditions Report
Ontario Line Project

Table 5-1: Preliminary Potential Impacts, Mitigation Measures and Monitoring During Construction

Environmental Component	Potential Impacts	Mitigation Measure(s)	Monitoring Activities
<u>Designated Natural Areas – West Don River Valley Candidate Regionally Significant Life Science Areas of Natural and Scientific Interest</u>	<ul style="list-style-type: none"> ■ Vegetation removal within the West Don River Valley Candidate Regionally Significant Life Science Areas of Natural and Scientific Interest ■ Disturbance, displacement or mortality of wildlife or habitat loss / degradation, including potential Significant Wildlife Habitat and Species at Risk ■ Soil or water contamination as a result of spills (e.g., grease and / or fuel) from equipment use ■ Introduction or spread of Invasive Species ■ Increased erosion and sedimentation ■ Reduction in ecological function and integrity 	<ul style="list-style-type: none"> ■ Refer below to mitigation measures described for Vegetation Communities. ■ Refer below to mitigation measures described for Wildlife and Wildlife Habitat. ■ Refer below to mitigation measures described for Species at Risk. ■ Mitigation measures will be confirmed and refined as part of the Environmental Impact Assessment Report, as applicable. 	<ul style="list-style-type: none"> ■ Refer below to monitoring described for Vegetation Communities. ■ Refer below to monitoring described for Wildlife and Wildlife Habitat. ■ Refer below to monitoring described for Species at Risk. ■ Monitoring will be confirmed and refined as part of the Environmental Impact Assessment Report, as applicable.
<u>Policy Areas – City of Toronto Natural Heritage System and E.T. Seton Park Environmentally Significant Area</u>	<ul style="list-style-type: none"> ■ Vegetation removal within the City of Toronto Natural Heritage System and E.T. Seton Park Environmentally Significant Area ■ Disturbance, displacement or mortality of wildlife or habitat loss / degradation, including potential Significant Wildlife Habitat and Species at Risk ■ Disturbance, displacement or mortality of wildlife or habitat loss / degradation, including potential Significant Wildlife Habitat and Species at Risk ■ Soil or water contamination as a result of spills (e.g., grease and / or fuel) from equipment use. ■ Introduction or spread of Invasive Species ■ Increased erosion and sedimentation ■ Reduction in ecological function and integrity 	<ul style="list-style-type: none"> ■ Refer below to mitigation measures described for Vegetation Communities. ■ Refer below to mitigation measures described for Wildlife and Wildlife Habitat. ■ Refer below to mitigation measures described for Species at Risk. ■ Mitigation measures will be confirmed and any additional mitigation measures will be identified as part of the Environmental Impact Assessment Report, as applicable. 	<ul style="list-style-type: none"> ■ Refer below to monitoring described for Vegetation Communities. ■ Refer below to mitigation measures described for Wildlife and Wildlife Habitat. ■ Refer below to mitigation measures described for Species at Risk. ■ Monitoring will be determined as part of the Environmental Impact Assessment Report, as applicable.
<u>Policy Areas – City of Toronto Ravine and Natural Feature Protection</u>	<ul style="list-style-type: none"> ■ Tree removal within the City of Toronto Ravine and Natural Feature Protection 	<ul style="list-style-type: none"> ■ Refer below to mitigation measures described for Tree Removal under Vegetation Communities. ■ Compensation for tree removals will be undertaken in accordance with provisions outlined in the Metrolinx Vegetation Guideline (2020). 	<ul style="list-style-type: none"> ■ Refer below to monitoring described for Vegetation Communities.
<u>Policy Areas – Toronto and Region Conservation Authority's Terrestrial Natural Heritage System and Regulation Areas</u>	<ul style="list-style-type: none"> ■ Vegetation removal within Toronto and Region Conservation Authority Regulated Areas and Terrestrial Natural Heritage System 	<ul style="list-style-type: none"> ■ Further consideration to minimize potential impacts on Toronto and Region Conservation Authority's Terrestrial Natural Heritage System to the extent possible will be undertaken during detailed design. 	<ul style="list-style-type: none"> ■ Refer below to monitoring described for Vegetation Communities. ■ Recommendations for additional monitoring related to vegetation removal within regulated areas may be determined through consultation with Toronto and Region Conservation Authority.