
Section K.6:

Review Agency and Stakeholder Comment Log

| Waterfront East LRT Transit and Rail Project Assessment Process (TRAP) - Environmental Project Report [DRAFT] Review Comment Log | | | | *Comment Code Action: 1 = Accept Comment, will revise accordingly 2 = Disagree/Dismiss/ Not Applicable 3 = Clarify or Discuss and resolve prior to next design phase 4 = Address comment in future design stage | | ** Status: O = Open, not resolved P = Pending incorporation in design C = Closed | | | |
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| Item No. | Organization | Page No. | Review Comment | Project Team Response | | Stakeholder Follow-Up | | Project Team Response | ** Updated Status |
| | | | | Response | * Action 1 / 2 / 3 | ** Status O / P / C | Follow-Up Response | | |
| 1 | MECP - EAB | ES | The 'Executive summary' should be a high-level description of the proposed project), summary of planning process, and outcome. The current Executive Summary provides information that could be incorporated in the Project description or background. Please consider revising. | Redundant information has been removed from the executive summary. The remaining sections provide an overview of the Project, the planning process (including a summary of existing conditions; Project impacts, mitigation measures, and monitoring activities; and consultation), and outcomes and next steps. | 1 | C | | | C |
| 2 | MECP - EAB | ES | The 'Executive summary' and 'Section 1.0 Introduction' in the draft EPR discussed segments and phases as part of the project description. EAB contends that details about segments and phases are more related to the Project background. Furthermore, what is understood as the project footprint (referred to as the TPAP boundary in the draft EPR) also includes reference to segments but not all the segments are part of the current project footprint or part of the TPAP. The ministry suggests simplifying the Project description to focus on the Project footprint and the related infrastructure and ancillary activities that will be part of the TPAP for the Project. It would be useful to distinguish "Segments" that are part of the current Project footprint (i.e. Area A, Area B) versus segments as part of Phase 1 of the project (Segment 1, Segment 2, Segment 3), with reference to separate mapping. This will reduce confusion and provide clarity to the public regarding the transit project for which the proponents are completing the TPAP versus future LRT extensions that may be part of other TPAPs? Please clarify the Project description and mapping as necessary in the draft EPR. | The discussion of phases and segments is now only included in the Project Background section. As suggested, the terminology "Area A" and "Area B" have been adopted to refer to the portions of the overall network that are within the Project footprint (TPAP boundary). Maps and descriptions have been updated accordingly. | 1 | C | | | C |
| 3 | MECP - EAB | ES | Page 13 of the 'Executive summary' of the draft EPR includes a consultation and engagement section and provides engagement efforts that have been made to date but does not include Indigenous communities. However, further down on the page it indicates that 'ongoing consultation with Indigenous Communities' is listed as 'additional opportunities for consultation and engagement'. Based on the summary on page 174 in section 6.2.5, it is clear that consultation with Indigenous communities have been initiated. Please revise the report so that information is consistent. | This section of the Executive Summary has been updated to clarify that engagement with Indigenous Communities has begun. | 1 | C | | | C |
| 4 | MECP - EAB | Intro | As per Point 2 above, please revise Section 1 of the report to clarify the Project for which the proponents are seeking TPAP approval. Typically, proponents refer and describe the Project's physical boundaries as a 'Project footprint' as opposed to 'TPAP boundary'. It would be helpful to understand why the remainder of Segment 2 is not included as part of this Project. It is recommended that reference to the segments should be included as part of the Project background. | Through the 2010 LDL IMP and 2014 LDL EAMP, Phases 3 and 4 of the Class EA process were completed for the preferred infrastructure undertakings east of the TPAP project area (Project footprint). To help clarify, Exhibit 1.1 now identifies the overall work and segments, and shades areas not included in the TPAP scope, with the "Environmental approvals" line identifying that these areas were subject to approval through the 2010 LDL IMP and 2014 LDL EAMP. As discussed with MECP, beyond this point in the document, "Project" is used consistently to refer to solely the project within the TPAP project footprint. As suggested, 'Project footprint' has been used in replace of 'TPAP boundary' and 'TPAP area' throughout the EPR. Additionally, the discussion of segments in the Introduction chapter has been shifted to the Project background sub-section. | 1 | C | | | C |
| 5 | MECP - EAB | Intro | Section 1.1 Purpose describes how the proponents are seeking approval for the Project and describes, at a high-level, the previous Class EA that was completed for the same project, but this section does not state why the proponents are proposing a transit project. Typically, in the purpose section of the EPR, proponents will describe why the project is required, for instance, to accommodate increases service demands associated with planned growth and service improvements in the project area. Under section 9(1) of the Transit Regulation requires a statement of purpose and a summary of background information relating to the project. Please describe the purpose for this project more clearly in this section of the EPR. | <p>The following statement of purpose has been included in the updated draft EPR:</p> <p>The Waterfront East Light Rail Transit (WELRT) network has long been established and officially approved as an essential component of Toronto's eastern waterfront. The WELRT will facilitate a transformation of existing and future development areas into a destination that welcomes all, connecting residents, workers and visitors to countless landmark places throughout Toronto's waterfront. The WELRT network will provide improved transit options to the Central Waterfront, Lower Yonge, East Bayfront, Quayside, Keating Precinct, Lower Don Lands, and the Port Lands communities. When fully built, the network is forecasted to provide over 50,000 daily trips, supporting an estimated 100,000 residents and 50,000 jobs.</p> <p>As ambitious plans to build dense housing and commercial spaces in the eastern waterfront advance, the transportation network must be built to support this new development. If the WELRT is not constructed to provide critical transportation infrastructure to the area, this will place ever increasing pressure on transit operating in mixed traffic. To bring these incredible places within reach of Toronto's residents, workers and visitors in an efficient and equitable manner, it is critical that they be connected with convenient, high-capacity transit service and served by a contiguous and inviting public realm. Per direction from City Council, further density increases are contemplated for the Port Lands and other developments on City-owned land. These changes are expected to further strengthen the case for higher-order transit.</p> | 1 | C | | | C |
| 6 | MECP - EAB | Intro | Page 19 – In Exhibit 1.3, suggest removing the reference to Ministry of Aboriginal Affairs and Aboriginal Affairs and Northern Development Canada in second box of the flowchart. Proponents are required to reach out to the ministry to confirm community list and that is all that is needed to be reflected in this step of the TPAP. | The reference to the Ministry of Aboriginal Affairs and Aboriginal Affairs and Northern Development Canada has been removed from the second box of the flow chart. | 1 | C | | | C |
| 7 | MECP - EAB | Project Description | As per the Transit Regulation subsection 2 of O. Reg. Section 9 (2), please provide a description of the other alternatives designs that were considered for the Project in the draft EPR. | As discussed with MECP on 2023-11-22, it was clarified that description of alternative designs considered is only applicable for detailed design decisions which were considered during the 120-day TPAP period. Any decisions to be evaluated as part of the 120-day period will be presented as such, however at this time none are expected. Some items which were evaluated during the pre-planning process (e.g. single stage or 2-stage intersections) will be clarified in the document as presenting the preferred alternative and noting that they were evaluated during the pre-planning stage. | 1 | C | | | C |

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| 8 | MECP - EAB | Project Description | Please provide a description of the proposed length for the current Project footprint and the overall proposed LRT, distinguished by methods (i.e. underground versus at-grade alignment). | Distances have been added into Exhibit 1.1 | 1 | C | | | C |
| 9 | MECP - EAB | Project Description | Third bus route bullet is missing number. | The number of this bus route is not yet known. It has been labelled TBD in the map. | 1 | C | | | C |
| 10 | MECP - EAB | Existing Conditions | A note on page 50 states “unless otherwise stated, any references to Segment 2 throughout this chapter refer to the portion of Segment 2 covered by this TPAP (i.e. between Bay Street and the western boundary of Street A). The distinction should be clearly described in the Project description at the start of the draft EPR. Alternatively, the ministry recommends revising the report to clearly define the Project footprint and remove this disclaimer throughout the report with the exception of the Project background section of the draft EPR. (See point 2). | As suggested, we have introduced "Area A" and "Area B" to make sure references to the portion of the Segment 2 included within the TPAP is clear. The previous disclaimers have now been removed. | 1 | C | | | C |
| 11 | MECP - EAB | Existing Conditions | Exhibit 3.1 (page 51) – when identifying ‘matter of provincial importance’ for “wetland, woodland, habitat of wildlife or other natural heritage area”, it finds the matter “not relevant with the exception of Yonge slip with aquatic habitat”. This statement is contradictory as it is relevant as part of habitat of wildlife. Please revise the second column of Exhibit 3.1. | Second column has been revised to remove the contradiction. | 1 | C | | | C |
| 12 | MECP - EAB | Impacts | Page 106 – The second paragraph of the page indicates design variations “do not require additional approval or amendment to the EPR unless they result in environmental impacts which cannot be mitigated using the approaches outlined in the report or a protocol for the changes has not been considered in the report.” It is important to note that design variations may trigger an addendum process in accordance with section 15(1)- 15(3). If there are significant changes to the Project as per subsection (4). O. Reg. 231/08, s. 15 (3) then the proponent must follow the consultation and impact assessment requirements under the regulation including an opportunity for stakeholder to submit and objection that will be reviewed by the ministry. The ability to mitigate impacts as a result of changes to the project that is inconsistent with the EPR, is not the reason for not requiring an addendum. It is strongly recommended that you revise the draft EPR to say “should the proponents wish to make a significant change to a transit project that is inconsistent with its EPR, the proponent must prepare an addendum to the EPR. ” | The text on this page has been updated as suggested by MECP and to be consistent with the Regulation. This change has also been reflected in other sections of the EPR where it appears, including Section 1.6. In Section 1.6, there were additional changes to the text to ensure consistency with S. 15 of the Regulation; in addition, reference to the description of what would or would not constitute a significant addenda has been removed, as this is stated in Section 1.6. These areas included section 2.3.2 and other areas where discussion of addenda or refinements to the design were made. | 1 | C | | | C |
| 13 | MECP - EAB | Impacts | Last Paragraph of Section 4.2.1.1.1 for Segment 1 states “ TTC preliminary geotechnical investigation report indicates that the amount of water to be drawn per day is approximately 150 to 300 cubic metres /day of water ... is not very significant compared with other sites of deeper water bearing soil layers and can be handled practically by common equipment used by the industry.” Please clarify how the Proponents determined significance? Please provide relevant references to support the statement. | The sentence "... is not very significant..." has been replaced with the following: Water quantities pumped during dewatering may be greater than 50m3/day and likely less than 400m3/day, in which case, an Environmental Activity and Sector Registry (EASR) may be required to permit the construction dewatering as stipulated by the Ontario Ministry of the Environment, Conservation and Parks (MECP). An EASR for construction dewatering would apply to the entire project and, therefore, construction would need to be staged such that the dewatering demands of the entire project do not exceed the 400m3/day limit at any time. If simultaneous dewatering is required that would result in the project water takings exceeding the 400m3/day rate, then a Permit to Take Water would be required from the MECP to permit this level of water taking. | 1 | C | | | C |
| 14 | MECP - EAB | Impacts | Last paragraph for Segment 2 of Section 4.2.1.1.1 states “improper dewatering practices may cause impacts to the physical environment.” Section 4.2.1.2.1 provided mitigation measures for dewatering, but it would be useful to also include a contingency plan should dewatering plan failed within this section so that groundwater is drawn down to safe levels. Furthermore, please elaborate what ‘physical impacts’ could be anticipated should improper dewatering practices be employed. | In Section 4.2.1.1.1, we have inserted language to describe the potential impacts if dewatering is not completed properly. In Section 4.2.1.2.1, we have inserted language to outline the need for a contingency plan should the dewatering plan fail . | 1 | P | The revised draft EPR revised the section number to 4.3.1.1.1 and 4.3.1.2.1. If this is correct, the matter is considered closed otherwise please revise the section numbers. Please review the sections to make sure they are consistent. | Yes, the previous comment log incorrectly noted the numbers of the modified sections. Sections 4.3.1.1.1 and 4.3.1.2.1 were modified to address the original comment. <i>Closed per email 2024-06-05</i> | C |
| 15 | MECP - EAB | Impacts | Last paragraph of Section 4.2.1.2.1 for Segment 2 (Page 110) indicates that dredging the lake sediments and disposal will be the preferred approach. Please discuss whether other approach had been considered. | Language regarding the consideration of two other options in the pre-planning stage were added to this section. These options were preloading and surcharge; and rigid inclusions; the reasons these were not considered feasible were indicated; wording was altered to clearly identify the proposed option. | 1 | C | | | C |
| 16 | MECP - EAB | Impacts | Section 4.5.3.1.1 of the draft EPR indicates there are two laydown areas. Please clarify why laydown areas are not being reflected within the boundaries of the Project footprint and whether mitigation measures to potential impacts have been considered. Further to the above, laydown areas may consider areas of impacts and require other legislative/regulatory approvals as such the ministry recommends a statement be provided in the draft EPR to clarify potential additional study or assessments required for those areas. | As discussed with MECP on 2023-11-22, the laydown areas will not be included in the 'project area' maps, however the team confirms that the laydown areas were considered as part of the supporting studies as appropriate. This will be clarified in the document, and as discussed we will include mitigation measures related to the laydown areas. Also confirming that the intended ultimate use of the two laydown areas is planned separately, and expected to be for public park space. | 1 | C | | | C |
| 17 | MECP - EAB | Impacts | Section 4 in the report provided mitigation measures to impacts on matters of provincial importance and constitutionally protected Aboriginal and treaty rights. However, there are no discussion on how the Proponents can verify the effectiveness of the proposed mitigation strategies. Please revise the draft EPR in accordance with subsection (8). O. Reg. s. 9 (2) | Monitoring of mitigation measures is the way in which the effectiveness of the mitigation measures will be verified. The document has been reviewed to ensure monitoring is included in sections 4 and 7. Details regarding the requirement for, and approach to ensure the effectiveness of monitoring has been included. This will include effectiveness monitoring and regular reporting during construction, how to address non-conformances and make corrective actions etc. | 1 | C | | | C |
| 18 | MECP - EAB | Impacts | Last paragraph in Section 4.7.1.1.1 of the Report states “the requirements for and ability to accommodate this end-of-line facility will need to be further assessed during future design stages. Is this an ancillary activity to the transit project? If so, the ancillary activity becomes part of the project and therefore will need to be described and assessed in the EPR . Please refer to section 1 of the Transit Regulation. Please clarify and revise accordingly. | TTC notes that Section 4.7.1.1.1 is meant to describe impact to the transit network during construction of Area 1. The intention for the text in that section is to capture the requirement during construction only. It is not meant to be a permanent end-of-line bus facility. The text in this section has been further clarified as follows to reflect this: “During construction of the underground Segment 1, TTC has identified a need for a temporary end-of-line facility in the vicinity of Union Station to support the replacement bus operations from both Queens Quay East and Queens Quay West.” | 1 | C | | | C |
| 19 | MECP - EAB | Climate change | In section 5.5 of the draft EPR, please discuss what criteria the proponent would use to verify the effectiveness of the mitigation measures in reducing the carbon footprint in mitigating negative impacts to the environment. | See updated changes to Exhibit 5.5 outlining recommended design and execution verification for GHG mitigation during the design phase and execution phase. | 1 | C | | | C |
| 20 | MECP - EAB | Climate change | Although the draft EPR provides climate change considerations and the trend of impacts of climate change, it is missing how the Proponents will design its facility and infrastructure to address extreme weather events given the unpredictability of future climate. Please discuss and make appropriate changes. | The climate change projections consider a high emissions RCP 8.5 scenario. Climate change considerations in the design are outlined in Section 5.4.2 for the climate change factors identified to have a potentially significant impact on this project. Resilience considerations will be incorporated in the technical specifications during the design phase. | 2 | C | | | C |

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| 21 | MECP - EAB | Consultation | In Exhibit 1.4, Chapter 6 entails Consultation records and summary of any discussions with the Indigenous Communities. However, Section 6.2.5 only provided information about when meetings were held with the communities, it did not include a summary of the conversation or discussions with the Indigenous communities identified in the draft EPR. Please provide additional information regarding the outcome of the consultation process with Indigenous communities, for example: how communities expressed their interest in reviewing the draft, what was provided to the communities, a summary of what was said about the meeting and whether there were concerns, responses to address concerns, and outcome of those meeting. The summary for Indigenous consultation should have the same level of details provided in Section 6.2.4 for Regulatory agencies | Waterfront Toronto will provide a summary of outcomes from discussions with Indigenous communities as part of the forthcoming consultation record, for review with MECP. | 1 | O | In addition to a summary please group the comments by who (i.e., GRT vs public vs Indigenous communities), type and proponent responses to all comments. You can do that in a table such as this. Separately, please also include copies of the incoming, and redact any personal identifiers. | The summaries in EPR Section 6.2 are grouped accordingly, as are records of consultation to be included in Appendix K. Personal identifiers for commentors have been redacted in these records. <i>Closed per email 2024-06-05</i> | C |
| 22 | MECP - EAB | General | Appendix K.1, Consultation for First Nations/Indigenous Organization is missing Six Nation of the Grand River, but they are included in 6.2.5 as community that has been engaged. Please revise. | Appendix K.1 has been updated accordingly, and will be replaced in the forthcoming EPR draft. This will also be reviewed separately as part of the forthcoming consultation record. | 1 | C | | | C |
| 23 | MECP - EAB | General | Please note that the Project design is currently only at 30% stage as such the design is subject to change and multiple sections of the draft EPR are still being confirmed; this includes the Environmental Impact Assessment which is a critical section of the EPR. Given this, the ministry is requesting to view another draft of the EPR before finalizing to verify that all of the ministry's current comments have been adequately addressed in an updated version of the report. Furthermore, in 'Section 1.1 Purpose' of the draft EPR, states that the purpose of the draft EPR is to document the TPAP by providing 'A description of the 30 % design and engineering'. As per section 3.2.4 of the Transit Guide, lists the document requirements for the EPR, which include a final description of the transit project, including a description of the preferred design method. If more assessment is required to assess the full scope of impacts, additional detailed description of the Project may be required to satisfy ministry's comment. | Although the project is at 30% design, this is a sufficient level of detail to understand the description of the transit project, including a description of the preferred design method. There is sufficient information to assess the full scope of impacts as appropriate at the TPAP stage. We have clarified that the design will develop but if there is a change that is not consistent with the EPR the addenda process will be triggered. However, design development to more detail consistent with the project description in the EPR does not constitute a change. This will be reflected in the updated EPR draft for notice of commencement. 'Section 1.1 Purpose' of the draft EPR, has been revised to replace the bullet with 30% design reference (because the % is somewhat irrelevant) to the following: "A description of the transit project, including a description of the preferred design method"; with the caveat elsewhere that a change that is not consistent with the EPR will trigger the addendum process. | 1 | C | | | C |
| 24 | MECP - EAB | General | Exhibit 6.1 in Page 166 of the report attached an image of an individual. Please remove. | The individual has been removed from Exhibit 6.1. | 1 | C | | | C |
| 25 | MECP - EAB | General | It would be useful to include a column for effectiveness verification in Exhibit 7.4 | The column which includes the monitoring requirements outlines how the effectiveness of the mitigation measures will be determined. Section 7.3 outlines in detail the process for establishing monitoring requirements. | 2 | C | | | C |
| 26 | MECP - EAB | General | Please remove Section 6.6 Statement of Completion as this will not be part of the final EPR. This step signalizes the completion of the TPAP and as such, there will be no opportunity to revise the final EPR once it's been published. This information should be documented and filed separately. | Section 6.6 has been removed | 1 | C | | | C |
| 27 | MECP - EAB | General | The Project study area is not clearly defined. The draft EPR uses 'TPAP study area' and 'study area' interchangeably throughout the report. The Project study area should be defined upfront once at the beginning of the draft EPR and supported by a map. The study area is the area within which activities associated with the undertaking will occur and where potential environmental effects will be studied, which typically extends beyond the Project's physical footprint. | Section 1.7 Study Area has been added to the EPR. This section defines the terms "Project footprint", "Project study area" and describes the study areas of each of the individual environmental studies completed in support of the TPAP. Word choice throughout the EPR has been reviewed and updated where appropriate. | 1 | C | | | C |
| 28 | MECP - EAB | Surface Water | I have completed a surface water review of the proposed Toronto Waterfront East LRT TRAP ESR. The ESR identified contaminations with onsite soil and groundwater due to past industrial activities, which included metals, VOCs, PAHs, PHC, PCBs etc. As the project is located in close proximity to Lake Ontario, key risks from surface water perspective is possible introducing of existing contamination into the Lake during construction and dewatering stage. The ESR discussed potential impacts and proposed mitigation measures and monitoring plans to address: • Contaminated ground Water during dewatering • Contamination from accidental spills and releases • Spill Prevention and Response • Runoff Control; and, • Erosion and Sediment Control. In terms of protection of aquatic life, the ESR proposed that mitigation measures will be prepared for working in and/or near water to address potential impacts to fish and fish habitat. In my po[r]tion, the proposed plans seem to address surface water concerns reasonably well at high level. I have no further requests or comments at this stage. Technical Support group might perform a more detailed review if a PTTW or ECA is required at a later stage. | Noted. | 1 | C | | | C |
| 29 | MECP - EAB | General | Please provide to the ministry as soon as possible, comments with respect to natural and cultural heritage features. In this regard, the ministry would like to see comments from the local Conservation Authority and the Ministry of Citizenship and Multiculturalism. As well as any relevant responses to these agencies and as well as their final comments. | Comments from TRCA (including responses) and from the Ministry of Citizenship and Multiculturalism provided, via email 2023-12-06. Further follow up, including responses to MCM, can be provided if helpful. | 1 | C | | | C |
| 30 | MECP - EAB | General | Please also advise if there have been any significant comments from any Indigenous communities on the draft EPR. | Comments from Six Nations of the Grand River elected council were received during an in-community meeting on November 3. Responses were provided, including responses to later follow-up emails. A log summarizing these comments was provided in our email to MECP 2023-12-06. We anticipate further coordination with Six Nations regarding our planting strategy. Significant comments from other communities have not yet been received. MCFN expressed an interest in reviewing materials related to terrestrial habitat, and those materials have been provided. We are awaiting further comment. No response has yet been received from Huron-Wendat Nation. We will continue trying alternative means to contact the community, and plan to attempt phone calls and ultimately mailing the relevant project information. HDI (on behalf of HCCC) has identified concerns with the TPAP but has not yet provided specific comments related to the work proposed for the WELRT project. | 1 | P | We would need to see all agencies' comments and confirm that the responses addressed their comments before the Notice of Completion. Please provide it to the ministry when it is available.. | Comments from review agencies were provided April 22, and the full comment records were provided May 16. <i>Closed per email 2024-06-05</i> | C |

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| 31 | MECP - Conservation and Source Protection Branch | General | The Waterfront East LRT draft EPR does not specifically discuss the protection of drinking water sources. The draft EPR should therefore include a section on drinking water source protection to identify that the project is occurring within the Toronto Region Source Protection Area (part of a larger Source Protection Region called CTC (Credit Valley, Toronto and Region, Central Lake Ontario)), the source protection vulnerable areas in which the project study area is situated (as noted above), and whether any policies of the CTC Source Protection Plan may apply to activities related to the construction, operation, and/or maintenance phases of the project. The EPR should also note whether the proponents (i.e., Waterfront Toronto, Toronto Transit Commission, and the City of Toronto) have been engaging with the CTC Source Protection Authority as the project progresses. | <p>New text has been incorporated in Section 3.3.2: Waterfront Toronto has reviewed the proposed works relative to the Intake Protection Zones IPZ-1 and IPZ-2 identified in the Toronto and Source Region Protection Area Approved Assessment Report dated March 2, 2022. The works are outside of both intake protection zones, with the nearest zones (Island 4 and Island 5) situated in the outer harbour south of the Toronto Islands over 3.5 kilometres through open water from the proposed location of the works.</p> <p>New text has also been incorporated in Section 4.2.1.2: Although the majority of the Designated Waterfront Area is identified as a highly vulnerable aquifer area (HVA), the construction and operation of the Waterfront East LRT is not anticipated to present any incremental risk beyond typical construction and maintenance activities within the area. Work will be conducted under Waterfront Toronto's Environmental Management Plan to mitigate potential impacts.</p> | 1 | P | <p>The section of the draft EPR in which the suggested text on IPZ-1 and IPZ-2 is written is found under section 3.4.2 and not under section 3.3.2. This suggested text included in the report does not precisely capture the source protection vulnerable areas in which the study area is situated. Therefore, please include the following text in the updated version of the draft EPR for accuracy: The study area is situated within an Intake Protection Zone (IPZ) 3, a Highly Vulnerable Aquifer with a vulnerability score of 6, and in an Event-based Area (EBA) for stored/transported fuel/oil spill. [Optional to include the following text at the end of the sentence which explains what an EBA is: The EBA in which the study area is situated is where modeling has shown that spills from fuel oil pipelines could impact the quality of water at the drinking water intakes.]</p> <p>The suggested text on the designated waterfront area is found under section 4.3.1.2 of the draft EPR and not under section 4.2.1.2. Please revise the first sentence to read as: "Although the Designated Waterfront Area is within a Highly Vulnerable Aquifer (a type of vulnerable area for drinking water source protection) with a vulnerability score of 6, the construction and operation ..."</p> | <p>The section numbers had been incorrectly noted in the previous response.</p> <p>The recommended text from the follow-up has been incorporated into sections 3.4.2 and 4.3.1.2. <i>Closed per email 2024-06-05</i></p> | C |
| 32 | MECP - Conservation and Source Protection Branch | General | Section 4.2 of the draft EPR outlines the impacts and mitigation measures to the natural environment during the construction and operation phases of the project with the understanding that these impacts and associated mitigation measures will be reviewed and refined in future phases of the project. From the description of the impacts, it is not clear if the project would engage in any of the prescribed drinking water threat activities such as the handling and storage of fuel, handling, storage, and application of road salt, storage and handling of dense non-aqueous phase liquids, storage of snow, stormwater management works, etc. within the project study area. Even if these activities do not pose a significant threat to drinking water sources, they may still pose a low or moderate threat for which source protection plan policies may apply. Particular attention should be paid if the relocation of any fuel oil pipelines is necessary during construction. | New text has been incorporated in Section 4.2.1.1.1: In both Area A and Area B, higher risk activities such as the relocation of fuel pipelines are not anticipated. Storage and handling of fuel have specific handling procedures and are not permitted near watercourses under Waterfront Toronto's EMP and will be carefully monitored during construction. The construction and operation of the WELRT is not anticipated to present any incremental increase in risk relative to the existing condition of the Queens Quay East municipal right-of-way. | 1 | O | The new text is written under section 4.3.1.1.1 of the draft EPR. While the draft EPR states that the relocation of fuel pipelines is not being anticipated and the storage and handling of fuel is not permitted near watercourses, it is not clear if other potential drinking water threat activities such as the handling, storage, and application of road salt, storage of snow, and stormwater management works have also been assessed. These other activities may occur during the various phases of the project. Furthermore, the draft EPR focuses on the construction and operational phases of the WELRT project, but not also on the maintenance phase of the project and the associated activities that may need to be undertaken during this phase. It is not clear if the maintenance phase of the project is also referred to as (and therefore understood as) the operational phase of the project. Please clarify. | <p>The section numbers had been incorrectly noted in the previous response.</p> <p>Added language about the handling, storage, and application of road salt; storage of snow; and stormwater management works in section 4.3.1.1.1 (construction impacts), 4.3.1.1.2 (operations impacts), and 4.3.1.2.2 (operations mitigation measures). The topic was already addressed at the end of section 4.3.1.2.1 (construction mitigation measures). Relevant summary text was also added in Table 7.4.</p> <p>Added a note in section 4.1 to clarify that the operations phase includes maintenance activities. <i>Closed per email 2024-06-05</i></p> | C |
| 33 | MECP - Conservation and Source Protection Branch | General | In terms of mitigation measures, the draft EPR proposes the development and implementation of a spill prevention and response plan, the development of a dewatering management plan to manage contaminated groundwater, the appropriate handling and storage of petroleum products and other chemicals, the assessment of existing conditions of water taking quantities and water quality, and undertaking appropriate discharge options by obtaining any required approvals and complying with requirements including pre-treatment if required. These measures may also mitigate risks to sources of drinking water and should be discussed as such in the EPR. | Noted. The wording will be amended to discuss the mitigation of risks to drinking water sources that result from the implementation of these plans and approvals programs. This has been added to Section 4.2.1.2.1. | 1 | P | Please amend, where needed, the text under both sections 4.3.1.2.1 and 4.3.1.2.2 of the draft EPR on how the risks to drinking water sources will be mitigated. | The text for 4.3.1.2.1 was already included - the previous response incorrectly noted the section as 4.2.1.2.1. Similar text has been added to acknowledge impacts during operations (4.3.1.1.2) and associated mitigation measures (4.3.1.2.2). <i>Closed per email 2024-06-05</i> | C |
| 34 | MECP - Conservation and Source Protection Branch | General | Where an activity(ies) poses a risk to drinking water, the proponent must document and discuss how the project adheres to, or has regard to, any applicable policies in the CTC SPP to address the risks. The policies should be listed and include any mitigation measures that may be proposed. | Please refer to responses 31-33 above. | 1 | P | No comment. | This comment is considered closed as there is no further comment. To be addressed through comments 31-33. | C |
| 35 | MECP - Conservation and Source Protection Branch | General | If they have not done so already, the proponents should contact the Project Manager for drinking water source protection at the CTC Source Protection Authority. The source protection authority can provide proponents with assistance in determining whether an activity associated with the construction or operation of the project may be considered a drinking water threat as per the Clean Water Act, 2006 and will be able to help determine whether there are policies in the source protection plan that may apply. Even if the project activities in a vulnerable area are deemed to not to be significant threats to drinking water, there may be other low and moderate threat policies that apply, therefore consultation with the local source protection authority is important. | Consultation was undertaken with TRCA, and they have identified that there are no drinking water source protection issues or concerns with respect to the Waterfront East LRT project. | 1 | P | Thank you for the comment. Please continue to engage with the Credit Valley, Toronto and Region, and Central Lake Ontario Source Protection Authority, as needed, to confirm whether proposed activities associated with the Waterfront East LRT undertaking may pose a threat to drinking water sources. | Engagement will continue to advance through the project detailed design. No further action anticipated for Transit and Rail Project Assessment Process. | C |
| 36 | MECP - Environmental Permissions Branch | EPR | Section 4.4.2.2.1: Construction equipment emissions should also meet the requirements of NPC-115 | Text in chapter 4 and the table in chapter 7 have been updated to include NPC-115. | 1 | C | | | C |

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| 37 | MECP - Environmental Permissions Branch | Appendix I.1 | Sections 3.2.2 & 3.2.3: Is the assessment using the formula from Table 4-10 of the FTA guideline for streetcars travelling at speeds at 25 mph or less, or the formula for speeds above 25 mph? Also, is the assessment using the formula in Table 6-10 of the FTA guideline for rapid transit or light rail, or the formula for locomotive powered passenger or freight? | The assessment used the formula from Table 4-10 for streetcars travelling as speeds of 25mph or less. Also the assessment used the formula in Table 6-10 of the FTA guideline for rapid transit or light rail. | 1 | O | Please check the log term whit "S". | To calculate the streetcar operational noise (Sections 3.2.2 & 3.2.3) FTA manual Equation 4-3 (for trains traveling at 50 mph) was used along with Table 4-9 SEL for Rail Transit and Streetcars traveling at 50 mph with 20*log(25/50) adjustment applied. WSP reviewed the calculation methodology to assess vibrations from streetcar operations and the review confirmed that the Eq. 6-2 (Rapid Transit or Light Rail Vehicles) from FTA manual was used in the assessment. <i>Closed per email 2024-06-12</i> | C |
| 38 | MECP - Environmental Permissions Branch | Appendix I.1 | Table A-1: Did the City verify the truck percentages? | Truck percentages were not verified by the city of Toronto. Truck volumes were assumed to be 10% of AADT and these were further split into 5% medium trucks and 5% heavy trucks. | 1 | O | Please provide some justification for the assumptions - are there examples / nearby traffic counts, etc.? | Based on the report, the AADT was established based on data provided by the City. However, it was not possible to confirm whether the % of truck data was confirmed by the City. It appears, that 5% medium and 5% heavy truck split, was based on a professional opinion regarding the traffic distribution within the study location i.e., in the downtown core. WSP completed a review of previous applications submitted for other facilities located in the downtown core and based on the review the percentage of heavy trucks was on average 4% to 5% which is line in with those used in this study. <i>Closed per email 2024-06-12</i> | C |
| 39 | MECP - Environmental Permissions Branch | Appendix I.1 | Road traffic noise for POR01(S): The predictions should not be made outside of the limits of the STAMSON program. Either a conservative adjustment must be made, or another prediction method can be used. | POR01(S) on Front Street was not included in the operational noise assessment. | 2 | O | This comment is in reference to the ambient sound levels due to road traffic. | WSP reviewed a method used to determine noise level increase for the receptor located closer than STAMSON limit of 15 m. WSP believes that the approach in which approximately 1.7 dB (i.e., calculated based on equation 10*log (15/10)) is added to the noise level predicted at 15 m, leads to a conservative result and can therefore be considered a conservative adjustment. In addition, WSP believes that the reported level at the receptors is likely underestimating the actual noise levels since the STAMSON program does not take into consideration reflections from nearby buildings and structures. <i>Closed per email 2024-06-13</i> | C |
| 40 | MECP - Environmental Permissions Branch | Appendix I.1 | Appendix B, Table with noise levels: Please check the nighttime noise level at 50 ft. | Nighttime noise levels have been corrected in Appendix B | 1 | C | | | C |
| 41 | MECP - Environmental Permissions Branch | Appendix I.1 | Appendix B, Tables with impact assessment (vibration): What are the ground-borne propagation effects (adjustments)? | Vibration impacts for construction activities were predicted based on reference levels and propagation models established and published in the FTA Manual, California Department of Transportation's Transportation and Construction Vibration Guidance Manual (CALTRANS Manual) [18], and British Standard 5228-2 2009 (BS 5228) [19], including propagation characteristics e.g. soil conditions, building foundation coupling. | 1 | C | | | C |
| 42 | MECP - Environmental Permissions Branch | Appendix I.2 | Some different approaches are taken to assess this segment compared to that of Segment 1. | Noted. Both approaches align with industry best practices. | 1 | C | | | C |
| 43 | MECP - Environmental Permissions Branch | Appendix I.2 | Representative ambient sound level calculations using ORNAMENT should be provided (was used for the study in Appendix 1-2, as well as the assessment for Segment 1). | Representative ambient sound level calculations have been calculated using ORNAMENT. Appendix 1.2 and the relevant sections of the EPR have been updated. | 1 | C | | | C |
| 44 | MECP - Environmental Permissions Branch | Appendix I.2 | Potential construction noise and vibration impacts were not detailed. | A brief section on construction phase impacts has been added to Appendix 1.2. The general mitigation measures discussed will be refined as detailed design proceeds and construction methods are better understood. | 1 | P | | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 45 | MECP - Environmental Permissions Branch | General | It is expected that more detailed assessments will be completed as additional information and design details become available. | As additional information (e.g., construction methods, use of laydown areas) becomes available, more studies will be completed as required. This has been noted in the future commitments table in chapter 7 and also referenced in the response above. | 1 | P | | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 46 | MECP - Environmental Permissions Branch | General | Please elaborate more on the possibility of wheel squeal noise. | There was previously no reference to wheel squeal in the Main Body of the EPR, nor the Segment 1 Preliminary Noise Study Appendix. The following has been added to Section 4.4.2.1.2: It is recognized that wheel squeal noise can occur on curved track sections such as the one that connects the Queens Quay - Ferry Docks Station to the East Portal. As the curved tracks are below-grade no impacts to sensitive receptors are anticipated. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |
| 47 | MECP - Central Region Technical Support Section Air Unit | Air quality | Section 5 notes that potential impacts from construction activities will be assessed using air dispersion modeling. Please elaborate when and how will this information be used. | The recommendation to conduct Air Dispersion Modelling of Construction Impacts would be implemented during the detailed design stage, when there is sufficient information about what is to be built, and how it is to be built, so that robust assumptions can be made about the work locations, durations, and the number and type of diesel engine powered construction equipment to be used that will result in emissions. The "worst case" Construction Scenario would then be modelled for the particulate matter (PM10 and PM2.5), nitrogen dioxide (NO2), carbon monoxide (CO) and selected volatile organic compounds (VOCs) parameters at Sensitive Receptors and assessed relative to the applicable Air Quality Criteria. This impact assessment would in turn lead to mitigation measures and monitoring recommendations to be integrated into Permits and Approvals, and Contract Specifications. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |

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| 48 | MECP - Central Region Technical Support Section Air Unit | Air quality | Table 10.1 "Ambient Air Quality Criteria and Project Limits" should list the PM2.5 24-hour AAQC as 27 µg/m3 rather than 30 µg/m3. | This correction will be made in the Table 10.1 in the Appendix of the EPR. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |
| 49 | MECP - Central Region Technical Support Section Air Unit | Air quality | The ministry agrees that a Dust Mitigation Plan must be implemented during the proposed construction activities to minimize off-site impacts at the nearest sensitive receptors. This includes ensuring activities like stockpiling and material handling are properly managed including verifying meteorological forecasts to determine which construction activities are to be performed, particularly during high wind events. | Section 4.4.1.2.1 and Exhibit 7.4 can be updated to incorporate the above-noted statements. With respect specifically to activities like stockpiling and material handling, the controls will be consistent with the <i>Waterfront Toronto Environmental Management Plan for Project-Related Activities</i> (August 2022). The components of the Environmental Protection Plan (EPP) for Air Quality and Dust Management within this document include best practices for stockpiling and material handling. The excerpt outlining these design and implementation considerations and maintenance, monitoring and documentation are attached to this letter. These measures will be referenced generally in Section 4.4.1.2.2 and used to augment the existing measures already included in Exhibit 7.4. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |
| 50 | MECP - Central Region Technical Support Section Air Unit | Air quality | For the ambient monitoring plan, it is recommended to: Monitor baseline conditions to capture representative concentrations under varying meteorological conditions. Where possible, to site monitors both upwind and downwind of construction activities. Include a section that describes what action will be taken if contaminated soil is discovered during construction activities. | The above comments will be incorporated into Section 4.4.1.2.1 and Exhibit 7.4 of the EPR. With respect specifically to actions to be taken if contaminated soil is discovered, it is known that there are some existing contaminants in soil in the site area. The controls around air quality and dust management will be consistent with the Waterfront Toronto EPP referenced above and are appropriate where soil contamination is present (again refer to excerpt attached). These measures will be referenced generally in Section 4.4.1.2.2 and used to augment the existing measures already included in Exhibit 7.4. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |
| 51 | MECP - Central Region Technical Support Section Air Unit | Air quality | The AQA should also consider climate change and regional air quality impacts when assessing the project's potential impacts. This may include comparing greenhouse emissions from the proposed undertaking with the provincial greenhouse gas totals reported by Environment Canada. | Section 4.4.1.3.1 and Exhibit 7.4 can be updated to incorporate the above-noted statements, however generally, short term activities like this are not factored in these provincial/regional long-term assessments. There will be sources of Greenhouse Gas (GHG) emissions associated with both the construction and operations phases of the WELRT associated with the energy use, which will be supplied by fossil fuels and electricity from the Ontario grid. The relevant GHGs include carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O), all of which are generated during fossil fuel combustion. Due to the small scale of the project, the GHG emissions are not appreciable when compared with the overall Canadian or Ontario GHG inventories and will have no measurable effect on atmospheric CO2 levels. At the construction planning stage, there would also be substantial uncertainty in the GHG estimates without accurate fleet and schedule information. For these reasons, GHG emissions are not quantified, but rather efforts will be made to mitigate GHG emissions from the construction activities will be introduced in the construction management plans. The operational phase of the project is expected to have a positive effect on climate change due to avoided GHG emissions associated with the modal shift from personal vehicles to public transit that will result in a decrease in overall GHG emissions. | 1 | C | | Based on confirmation from MECP received March 22, this comment has been marked closed by the proponents. | C |
| 52 | MNRF | | MNRF's natural heritage and natural resources GIS data layers can be obtained through the Ministry's Land Information Ontario (LIO) website. You may also view natural heritage information online (e.g., Provincially Significant Wetlands, ANSI's, woodlands, etc.) using the Make a Map: Natural Heritage Areas tool. We recommend that you use the above-noted sources of information during the review of your project proposal. | MNRF's Make a Map: Natural Heritage Areas has been reviewed. There are no ANSIs, wetlands, woodlands, conservation reserves, provincial parks, or natural heritage systems within the Project footprint. This is noted in section 3.3.4. | 1 | C | | | C |
| 53 | MNRF | | A series of natural hazard technical guides developed by MNRF are available to support municipalities and conservation authorities implement the natural hazard policies in the Provincial Policy Statement (PPS). For example, standards to address flood risks and the potential impacts and costs from riverine flooding are addressed in the Technical Guide River and Stream Systems: Flooding Hazard Limit (2002). We recommend that you consider these technical guides as you assess specific improvement projects that can be undertaken to reduce the risk of flooding. | The following has been added to Chapter 5 and Chapter 7: The Technical Guide for River and Stream Systems: Flooding Hazard Limit (2002) will be reviewed and applied during detailed design. The methodologies and standards detailed in it will be used to assess potential risks, guide design and determine any applicable mitigation measures to reduce the risk of flooding, if applicable. | 1 | C | | | C |
| 54 | MNRF | | The MNRF understands that the study area encompasses lands within the "Lower Don: Don River, Special Policy Area (SPA)". If the study area is located within a SPA, special consideration for any impacts to the flood plain and site-specific SPA policies may be necessary. Should the project result in any proposed change or modification to the official plan policies, land use designations or boundaries applying to SPA lands, prior approval by the Ministers of MMAH and MNRF will be required before the approval authority may approve such changes or modifications. MNRF recommends reviewing local official plans for confirmation of location of SPAs. MNRF may have additional information regarding SPAs which can be made available upon request. MNRF recommends including information at the EA stage about any expected changes to the floodplain or potential modifications to the SPA subject to provincial approval. | The fact that the study area encompasses land in a SPA has been noted in the Land Use section of chapter 3. As noted in Section 4.5.2.1: No modifications to official plan policies, land use designations, or boundaries applying to SPA lands are being sought as part of this Project. TRCA was consulted as part of stakeholder engagement and did not identify concerns with the project or changes in the SPA. | 1 | C | | | C |
| 55 | MNRF | | There may be petroleum wells within the proposed project area. Please consult the Ontario Oil, Gas and Salt Resources Library website (www.ogsrlibrary.com) for the best-known data on any wells recorded by MNRF. Please reference the 'Definitions and Terminology Guide' listed in the publications on the library website to better understand the well information available. Any oil and gas wells in your project area are regulated by the Oil, Gas and Salt Resource Act, and the supporting regulations and operating standards. If any unanticipated wells are encountered during development of the project, or if the proponent has questions regarding petroleum operations, the proponent should contact the Petroleum Operations Section at POSRecords@ontario.ca or 519-873-4634. | As noted in Section 3.3.1.3: According to the web map on the Ontario Oil, Gas and Salt Resources Library (www.ogsrlibrary.com) there are no petroleum wells within the Project footprint. If any unanticipated wells are encountered during the development of the project, the proponents will contact the Petroleum Operations Section. | 1 | C | | | C |

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| 56 | MNRF | | Please note, that should the project require: The relocation of fish outside of the work area, a Licence to Collect Fish for Scientific Purposes under the Fish and Wildlife Conservation Act will be required. The relocation of wildlife outside of the work area (including amphibians, reptiles, and small mammals), a Wildlife Collector's Authorization under the Fish and Wildlife Conservation Act will be required | We acknowledge the importance of adhering to regulatory requirements for wildlife relocation during the construction phase. We will obtain the necessary permits including the Licence to Collect Fish and the Wildlife Collector's Authorization as applicable, to ensure compliance with the Fish and Wildlife Conservation Act. This will be noted in Chapter 7 of the EPR. | 1 | C | | | C |
| 57 | MNRF | | Some Projects may be subject to the provisions of the Public Lands Act or Lakes and River Improvement Act. Please review the information on MNRF's web pages provided below regarding when an approval is, or is not, required. Please note that many of the authorizations under the Lakes and Rivers Improvement Act are administered by the local Conservation Authority. For more information about the Public Lands Act: https://www.ontario.ca/page/crown-land-work-permits For more information about the Lakes and Rivers Improvement Act: https://www.ontario.ca/page/lakes-and-rivers-improvement-act-administrative-guide | These two acts have been referenced in Chapter 7. | 1 | C | | | C |
| 58 | Transport Canada | | Please note Transport Canada does not require receipt of all Individual or Class EA related notifications. We request that project proponents self-assess whether their project: 1.Will interact with a federal property and/or waterway by reviewing the Directory of Federal Real Property, available at www.tbs-sct.gc.ca/dfrp-rbif/ ; and 2.Will require approval and/or authorization under any Acts administered by Transport Canada* available at http://www.tc.gc.ca/eng/acts-regulations/menu.htm . | See responses to comments 59 and 60 below. | 1 | C | | | C |
| 59 | Transport Canada | | Proposed projects that will occur on federal property (including reserve lands or lands owned by federal departments other than Transport Canada) will be subject to an Impact Assessment per Section 82 of the <i>Impact Assessment Act, 2019</i> prior to exercising a federal power (including full or partial funding), and/or performing a function or duty (e.g. regulatory approval or issuance of a lease) in relation to that project. | The only potential impact to federal lands is to waterways. The design team engaged with Aquatic Habitat Toronto (including representatives from Fisheries and Oceans Canada), who did not identify any specific requirements around federal impact assessment. It is understood that the proponent will need to engage Fisheries and Oceans Canada, Ports Toronto along with possibly other provincial, federal and municipal agencies at the time of design/permitting. | 1 | C | | | C |
| 60 | Transport Canada | | Below is a summary of the most common Acts that apply to projects in an Environmental Assessment context: •Canadian Navigable Waters Act (CNWA) – the Act applies primarily to works constructed or placed in, on, over, under, through, or across navigable waters set out under the Act. The Navigation Protection Program administers the CNWA through the review and authorization of works affecting navigable waters. Information about the Program, CNWA and approval process is available at: http://www.tc.gc.ca/eng/programs-621.html . Inquiries can be directed to NPPONT-PPNONT@tc.gc.ca or by calling (519) 383-1863 •Railway Safety Act (RSA) – the Act provides the regulatory framework for railway safety, security, and some of the environmental impacts of railway operations in Canada. The Rail Safety Program develops and enforces regulations, rules, standards and procedures governing safe railway operations. Additional information about the Program is available at: https://www.tc.gc.ca/eng/railsafety/menu.htm . Inquiries can be directed to RailSafety@tc.gc.ca or by calling (613) 998-2985. •Transportation of Dangerous Goods Act (TDGA) – the transportation of dangerous goods by air, marine, rail and road is regulated under the TDGA. Transport Canada, based on risks, develops safety standards and regulations, provides oversight and gives expert advice on dangerous goods to promote public safety. Additional information about the transportation of dangerous goods is available at: https://www.tc.gc.ca/eng/tdg/safety-menu.htm . Inquiries can be directed to TDG-TMDOntario@tc.gc.ca or by calling (416) 973-1868. •Aeronautics Act – this Act and the associated Canadian Aviation Regulations (CARs) govern civil aviation in Canada. Transport Canada should be notified of projects involving aerodromes and associated structures, or activities that could affect aviation safety. Elevated structures, such as wind turbines and communication towers, are examples of projects that must be assessed for lighting and marking requirements in accordance with the CARs. Transport Canada also has an interest in projects that have the potential to cause interference between wildlife and aviation activities. One example would be waste facilities, which may attract birds into commercial and recreational flight paths. Additional guidance can be found in the Land Use In The Vicinity of Aerodromes publication, available at: https://www.tc.gc.ca/eng/civilaviation/publications/tp1247-menu-1418.htm . Information about Transport Canada's Civil Aviation program can be found at: https://tc.canada.ca/en/aviation . Inquires can be directed to aviation.ont@tc.gc.ca or by calling 1 (800) 305-2059 / (416) 952-0230. | We acknowledge the relevance of the Canadian Navigable Waters Act (CNWA) and the Railway Safety Act (RSA) to the Project. We will ensure adherence to these regulations by conducting necessary analyses and consultations with Transport Canada and other relevant authorities. Our focus will be on compliance with the CNWA for any works affecting navigable waters and with the RSA for rail safety standards as applicable. | 1 | C | | | C |
| 61 | MECP - EAB | SAR | As part of TPAP, potential impacts to species at risk should be assessed. Currently, we only have documentation for Fish Habitat provided in the Appendices for the Waterfront East LRT project. Can you confirm whether there will be a study for species at risk for this project? If so, when can we expect to see the study. | Thank-you for sharing MECP's comments regarding the Waterfront East LRT (WELRT) Transit Project Assessment Process (TPAP). The following summarizes responses from the project team with respect to your comments. Existing conditions in the aquatic environment are documented in Section 3.3.2 of the draft Environmental Project Report (EPR). As stated, there is no in-water work and therefore no impact to the aquatic environment or need for Species at Risk (SAR) surveys in Segment 1. For Segment 2, a list of species present is provided in the Fish Habitat Impact Assessment Memo (Appendix D), which is generally indicative of this area of the waterfront. None of the species identified in the list are identified as SAR. We recognize that we did not explicitly state that there are no SAR present in the area, and we will include this statement in the revised EPR with respect to the aquatic environment. Any future SAR studies would be completed only as required in relation to permits associated with the lake fill activities, as approved by Department of Fisheries and Oceans (DFO). These would be completed pre-construction when details of the infill are available. With respect to SAR in terrestrial environments, section 3.3.3 outlines existing conditions. We have noted that for Segment 1 there were no anticipated impacts to the terrestrial environment during construction or operations given the nature of the planned activities. Regarding Segment 2, the report states in section 3.3.3.1 that there are few significant terrestrial environmental features in the project area. There is sparse vegetation including only a few urban street trees and grassed areas in pedestrian promenades. However, the report does not explicitly state that the lack of habitat would be expected to preclude SAR in the area. The section was mostly focused on the impact to the urban trees as opposed to fauna species. None of the tree species are SAR. The EPR will be revised to clarify that this is a highly urbanized environment and would not be expected to provide the habitat to support SAR. Further the limited tree species in the area are not SAR. I trust the above clarifications and proposed revisions will sufficiently address your comments. Thank-you again for sharing these comments and please feel free to contact me if you have any further recommendations or comments. | 2 | O | The proponent may need to acquire permit(s) or some other form of permission(s) for all or part of the project components under the Endangered Species Act. MECP Permissions staff note that studies and assessments may be required to fulfill this obligation | Table 7.3 has been updated to indicate that if further aquatic studies result in identification of species at risk, provincial permitting and associated studies may also be required. 2024-05-30 MECP Response: With respect to terrestrial SAR, if any trees are to be removed/manipulated, they should be checking for SAR Bat habitat. 2024-05-30 Proponent Response: The following statement will be added to the EPR, in the mitigation measures for tree removal under the Terrestrial impacts section: "Although the quality of the potential habitat is considered low, trees that will be removed or manipulated will first be evaluated for SAR bat habitat and mitigation measures taken if warranted." 2024-06-03 MECP Response: That is perfect. | C |
| 62 | MCM | 3.4 Cultural Environment | We recommend that an introductory paragraph be added here explaining what the cultural environment consists of. | An introductory paragraph has been added to section 3.4 | 1 | C | | Closed per response letter 2024-04-12. | C |

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| 63 | MCM | 3.4.1 Archaeological resources | <p>The Description of Existing Conditions of the EPR will be based on the archaeological assessment (AA) report(s) completed and include:</p> <ul style="list-style-type: none"> • A brief overview of all the stages of archaeological assessment undertaken (e.g., Stage 1, 2, 3, 4) • The objective of that stage of assessment (e.g., A Stage 1 AA is a background study to determine area(s) of archaeological potential, a Stage 2 AA is a property assessment to determine whether archaeological resources might be present etc.) • The outcomes (conclusions and recommendations) of the AA are to be articulated in the EPR. If archaeological potential or resources are present, the AA would recommend further archaeological assessment to be undertaken (up to a Stage 4). If there is no archaeological potential or resources present the AA would clearly state that the area specified (and mapped) has no further archaeological concerns. NOTE: The conclusions/recommendations are typically included in the Executive Summary of the AA and should be reiterated (cut and paste) in the EPR. • If the Stage 1 AA determined that the study area includes areas of archaeological potential, the EPR will include the map(s) from the AA report showing those areas. • The AA report(s) and MCM letter(s) indicating that the report(s) has been entered into the Ontario Public Register of Archaeological Reports should be appended to the EPR. <p>Example of information to be included in the EPR: [The EPR is to include an overview of the stage of assessment undertaken (e.g., Stage 1, 2, 3), and its objective or purpose] A Stage 1 archaeological assessment was undertaken on [date] by [consultant archaeologist] for [property or study area]. A Stage 1 AA consists of a review of geographic, land use and historical information for the property and the relevant surrounding area, a property visit to inspect its current condition and contacting MCM to find out whether, or not, there are any known archaeological sites on or near the property. Its purpose is to identify areas of archaeological potential and further archaeological assessment (e.g., Stage 2-4) as necessary. The Stage 1 AA is included in Appendix X. [Then include the outcomes and recommendations of the report, as in Executive Summary]</p> | The text has been updated in accordance with the sample provided. The MCM letters will be appended once received. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 64 | MCM | 3.4.2 Built heritage resources and cultural heritage landscapes | <p>The Description of Existing Conditions related to built heritage resources and cultural heritage landscapes will be based on the Cultural Heritage Reports: Existing Conditions and Preliminary Impact Assessment and Cultural Heritage Evaluation Report(s)</p> <p>Example of information and level of detail to be included in the EPR for Existing Conditions:</p> <p>[The EPR is to include an overview of the report(s) completed, their objective or purpose, the outcomes and recommendations of the report(s)]</p> <p>A Cultural Heritage Report- Existing Conditions and Preliminary Impact Assessment was undertaken on [date] by [heritage consultant] for [name of project or study area]. The assessment for this report consisted of data collection, background historic research, review of secondary source material and field review. A total of # (known and potential) built heritage resources and cultural heritage landscapes were identified within or adjacent to the project study area as listed below. [include table from the report]</p> <p>Cultural Heritage Evaluation Reports were recommended for the # properties that could be directly impacted. All CHERs were undertaken on [date] by [heritage consultant]. The Cultural Heritage Reports- Existing Conditions and Preliminary Impact Assessment and CHERs are included in Appendix X.</p> | The existing conditions built heritage resources and cultural heritage landscapes sections have been updated in alignment with the example provided. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 65 | MCM | 4.3 Cultural environment | As with comment #2 above, we recommend that this section be expanded as seen in the sample provided. The revisions should be finalized after the archaeological assessment reports have been reviewed and entered into the Ontario Public Register of Archaeological Reports. | Minor edits have been made to the archaeological assessment and BHR/CHL text in section 4.3 to align the text more closely with the samples provided in comments 2 and 3. We have made an effort to reduce duplication between section 3.4 and 4.3 while also ensuring that the key info regarding when the studies were done, who conducted the studies, and what the findings were are present in both sections. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 66 | MCM | 7.2 Permits and approvals | We recommend that this section be retitled to "Permits, approvals and other legislative requirements". Archaeological review letters, for example, are neither permits nor approvals but are related to legislative requirements. We further recommend that the title and first column of Exhibit 7.3 be revised similarly. | Section title, table header, and table caption have been updated as recommended. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 67 | MCM | Exhibit 7.3 Permitting and approvals requirements | We recommend, for consistency with other rows, that the cell in the same row under the "Description of Project activities that may require permits or approvals" be reworded as "Prior to any ground disturbing activities, proponent shall receive letter issued by MCM indicating that the archaeological assessment report(s) have been entered into the Ontario Public Register of Archaeological Reports." | Cell value has been updated as recommended. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 68 | MCM | Exhibit 7.4 Mitigation and monitoring activities | The Mitigation Measures with respect to archaeological resources should more specifically reflect the recommendations from the archaeological assessment reports regarding monitoring activities and particularly the course of action to be followed if archaeological resources are encountered. We also note that the archaeological assessment reports recommend that the archaeological monitor visit the site on a regular basis even before excavation reaches 75/76 meters a.s.l.; this should be accurately reflected here. | The detailed archaeology mitigation measures have been added to Table 7.4. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 69 | MCM | Exhibit 7.4 Mitigation and monitoring activities | In the built heritage resources and cultural heritage landscapes row of Exhibit 7.4, commitments are made to specified mitigation measures "where recommended". We recommend that this cell specify the properties to which each mitigation measure is to apply, following the recommendations of the Cultural Heritage Reports and Heritage Impact Assessments, just as the Potential Impact field notes the properties to which each potential impact applies. | The specific properties have replaced the "where recommended" text. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 70 | MCM | Throughout | Further revisions should be made where necessary to reflect the recommended revisions to supporting documents below, where text from them is used in the EPR. | The term "site plan control" has been replaced with "protective measures" in the EPR body to align with the change made in the appendix. | 1 | C | | Closed per response letter 2024-04-12. | C |
| 71 | MCM | Appendix G.1 | For ease of use, it would be helpful if the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and the individual Heritage Impact Assessments were presented as separate sub-appendices (e.g., Appendices G.1 through G.5), much like the two reports related to Segment 2 are separate sub-appendices (currently G.2 and G.3). | HIAs to be placed in separate appendices to the EPR as requested | 1 | C | Resolved | | C |

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| 72 | MCM | Appendix G.1 CHR: 2.1.1 Legislative Requirements and Regulations (page 6) | This section should describe the TPAP process/Ontario Regulation 231/08 and the cultural heritage reporting requirements pursuant to it. | The TPAP process is adequately described in section 1.2.1 of the EPR: 1.2.1 Matters of provincial importance The Minister may only require further steps if there is a potential for a negative impact on a matter of provincial importance that relates to the natural environment or has cultural heritage value or interest, or on a constitutionally protected Aboriginal or treaty right. | 2 | O | We continue to recommend that the TPAP process be mentioned in the Cultural Heritage Report. The Report should be readable as a stand-alone document, and the regulatory process pursuant to which it was completed is an important part of its context. Ontario Regulation 231/08, which triggers this report, is considerably more relevant to it than the Provincial Policy Statement, consideration of which is not directly mandated under the Environmental Assessment Act or associated regulations, but which nevertheless is noted in Section 2.1.1. Noting the TPAP process would also be consistent with the equivalent section of the Area B Cultural Heritage Report in Appendix G.6. | We will revise WELRT TPAP EPR Appendix G.1- Cultural Heritage Report (Segment 1) as follows to match the wording in Appendix G.6 - Cultural Heritage Report (Segment 2) Executive Summary and section 1.4 Cultural Heritage Report Purpose WSP was retained by TTC to complete a Cultural Heritage Report (CHR) in support of the WELRT. This CHR represents one deliverable to support program delivery. This CHR is being carried out under the Transit Project Assessment Process (TPAP) under Ontario Regulation 231/08 – Transit Projects and Metrolinx Undertakings, and was prepared in accordance with the Ministry Citizenship and Multiculturalism (MCM) guidance document titled Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and Environmental Project Reports (EPR) under Transit Project Assessment Process (TPAP) for Proponents and their Consultants (MCM 2019). | C |
| 73 | MCM | Appendix G.1 CHR: Table 5: Inventory of Known and Potential Built Heritage Resources and Cultural Heritage Landscapes (page 26) | In the case of cultural heritage resources that were identified during field review (CHRs 10 and 14), we recommend that the language of the Description of Property and Known or Potential Cultural Heritage Value or Interest (CHVI) be revised to refer more specifically to one or more of the CHVI criteria found in Ontario Regulation 9/06, for example noting that the resource may be a representative example of the International style, etc. | The Inventory entries for potential built heritage resources and cultural heritage landscapes are based on a high-level description of the property. WSP's understanding is that O. Reg. 9/06 is not a screening tool and that a statement of cultural heritage value and list of heritage attributes should be presented in a CHER. | 2 | C | Acknowledged. | | C |
| 74 | MCM | Appendix G.1 | Both the Cultural Heritage Report and the Heritage Impact Assessments use the term "site plan control" for a type of mitigation measure involving protective fencing and the inclusion of notes on project drawings to alert project personnel to the status of the resource. As the term "site plan control" has a specific and unrelated meaning under the Planning Act, we recommend that this usage be avoided, especially in a project with a municipal proponent. We suggest using a different term, such as "protective notation and fencing". | "site plan control" revised to "protection measures" | 1 | O | We note that "site plan control" still appears in the HIAs (Appendices G.2 through G.5), which do not appear to have been revised since our previous comments were submitted, and in Recommendation 4 in Section 7.0 of the Area A Cultural Heritage Report (Appendix G.1) and where it appears in the HIAs (Appendices G.2 through G.5). | The term "site plan control" has been revised to "protection measures" in recommendation 4 in Section 7.0 of the Area A Cultural Heritage Report (Appendix G.1) and where it appears in the HIAs (Appendices G.2 through G.5). <i>Closed per email 2024-06-05</i> | C |
| 75 | MCM | Appendix G.1 CHR Appendix D; HIAs various appendices – Assessor Qualifications | The "Assessor Qualifications" appendix of each report should note each staff member's individual role in the preparation of the report. | Added | 1 | C | Acknowledged. | | C |
| 76 | MCM | Appendix G.2 | On July 31, 2023 MCM provided comments on a previous draft of the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment for Segment 2. Our comments have been substantially addressed in the updated draft presented as Appendix G.2. As such we have no further comments on the document included in this Appendix. | Noted | 1 | C | | | C |
| 77 | MCM | Appendix G.3 | We find this CHER to be consistent with the requirements, guidance and standards of the TPAP and with the best practice guidance prepared by the Ministry. We have no comments on the draft CHER. | Noted | 1 | C | | | C |
| 78 | George Brown College | General | This is to confirm that George Brown has received the updated information on the Waterfront East LRT and is fully supportive of this project proceeding. Our only comment is to clearly state that the sooner the project is completed, the better it will be for the convenience of our students and staff. | Noted, this is included in the consultation record. | 1 | C | | Based on confirmation from George Brown College received March 19, this comment has been marked closed by the proponents. | C |
| 79 | Toronto Fire | General | TFS Emergency Planning will require TFS Aerial Truck Auto turn analysis for all intersection turns as well as through movements in sections where roads bend to illustrate conflicts if any exist. | WSP conducted this analysis for fire trucks for the 30% design. Access for fire trucks will be maintained as the design progresses. This has been noted as a future commitment in chapter 7. | 4 | P | TFS Emergency Planning is keeping this as pending based on 60%, 90% and final designs for further review. | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 80 | Toronto Fire | General | Fire Hydrants must be always active/operational during the scope of the project. If a Fire Hydrant must be relocated the new location must meet all requirements of applicable Codes (OBC & OFC), Standards etc. | This has been added to chapter 7 as a future commitment. | 1 | P | TFS Emergency Planning is keeping this as pending based on 60%, 90% and final designs for further review. | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 81 | Toronto Fire | General | A dedicated TFS Emergency Access Route must be available and maintained free and clear of obstructions, equipment and/or vehicles at all times. This will allow Toronto Fire Services (TFS) rapid emergency response and prevent delays. | Noted. There is already a future commitment in chapter 7 that speaks to this: "Maintain emergency services and transit through the construction limits at all times with the exception of certain periods where either Bay Street or Queens Quay West are closed to transition between phases. When a closure is needed, impacted groups/agencies will need to be notified to ensure the appropriate contingency plans are in place." | 1 | P | TFS Emergency Planning is keeping this as pending based on 60%, 90% and final designs for further review. | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 82 | Toronto Fire | General | All Fire Routes will be maintained free and clear of obstructions, equipment and/or vehicles at all times. This will allow Toronto Fire Services (TFS) rapid emergency response and prevent delays. | This has been added to chapter 7 as a future commitment. | 1 | P | TFS Emergency Planning is keeping this as pending based on 60%, 90% and final designs for further review. | No further action anticipated as part of Transit and Rail Project Assessment Process, to be incorporated in future project design. | C |
| 83 | Metrolinx | Engagement | Section 6.2.4.2 Metrolinx: No date is provided for the meeting. Please confirm if Metrolinx EPA was a participant. | Our records indicate that nobody from Metrolinx Environmental Projects and Assessment were present at the meetings with Metrolinx. | 1 | C | Acknowledged. This can be closed. | | C |

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| 84 | Metrolinx | General | Metrolinx acknowledges that Segment 3, including potential impacts to heritage properties at Cherry St. Subway and Cherry Interlocking Tower, are beyond the scope of this TPAP. | Noted. | 1 | C | Acknowledged. This can be closed. Metrolinx EPA should be contacted for any future potential impacts to provincial heritage properties. | | C |
| 85 | Metrolinx | General | Metrolinx acknowledges that new proposed vertical access connections for Segment 1, from the expanded Union LRT Station up to the GO rail platforms, have been removed from the 30% design. | Noted. | 1 | C | | | C |
| 86 | Metrolinx | Appendix G.1 | G.1 Segment 1 CHR & HIA: note that Bay St. Subway is also recognized as a <i>provincial heritage property</i> (local significance). The Metrolinx SCHV is attached to this email. Please review and confirm if any direct/indirect impacts to the heritage property are anticipated. Phase I and II ESA: site investigation observations and results are consistent with what Metrolinx has found within its USRC East rail corridor (USEP and OnCorr projects). | As all work is below grade there will be no direct impacts to the Bay St. Subway. This areas was identified as part of the train shed. As noted in Table 5 Summary of Community Engagement within the Union Station HIA, this SCHV was not identified or provided previously. As a future commitment, at detailed design a separate HIA can be generated for the Bay St. Subway. Future commitment has been added into the EPR (section 7). Noted regarding the Phase I and II ESA. | 1 | C | Acknowledged. This can be closed. Future commitment to contact Metrolinx EPA if potential impacts to provincial heritage properties are identified during future project phases. | | C |
| 87 | Metrolinx | Appendix G | Archaeology: Stage 1 and 2 AA results are consistent with Metrolinx assessments within the USRC rail corridor, including the identification of presence of deeply buried artifacts and monitoring by licenced archaeologist where bulk excavation approaches 76m ASL. | Noted | 1 | C | | | C |
| 88 | Metrolinx | Appendix G | HIA for Union Station Complex: Mx EPA confirms that the information previously provided remains accurate. SCPs have not yet been advanced for Metrolinx-owned portions of Union Station, Yonge St. bridge or Scott St. Interlocking Tower. | Noted | 1 | C | Acknowledged. This can be closed. Metrolinx EPA is currently preparing draft SCPs for Scott St. Interlocking Tower and Chery St. Interlocking Tower (O.Reg 10/06 PHPPSs) | | C |
| 89 | TCDSB | General | Following review of the materials, the TCDSB has concluded that there would be no impact to existing TCDSB schools related to this project. | Noted | 1 | C | As noted in previous comments, the TCDSB has no concern at this time however will continue to monitor this project as it relates to any impact on local schools and requests notification of any modifications, community consultations, appeals or notices of decision relating to this project or related projects. | | C |
| 90 | TDSB | General | Can you please advise of any estimates of timing re implementation/construction? | Response provided 2023-11-24 Regarding estimated timing, the overall duration of the project is expected to be about 10 years. This could begin as soon as capital funding is received, and there is not yet a clear indication of when that will be. | 1 | C | | | C |
| 91 | TDSB | General | The map below identifies four future TDSB schools being planned in the vicinity of the proposed LRT. We ask that the location of these schools be considered as the Waterfront East LRT project moves forward. | This has been added to chapter 7 as a future commitment. | 1 | C | | | C |
| 92 | TDSB | General | With respect to Segment 2, I note the proximity to the Sugar Wharf school (anticipated to open 2028/2029), located within the podium of the building at 55 Lake Shore Blvd East. The school will be utilizing the City's Lower Yonge park for outdoor play area. Any construction mitigation should factor in the location of the future school and the crossing of 400-500 students across Downes (Harbour St extension) throughout the day to access the park. Please let me know if you would like further information on this. | This has been added to chapter 7 as a future commitment. | 1 | C | | | C |
| 93 | TPH - Air Quality | | Healthy Environments staff are pleased to learn the project includes a preliminary air quality study. This ensures that a baseline of the current air quality in the vicinity of the project is defined. This report should also include sources and activities that would influence air quality and identify any risks they pose to nearby receptors. In particular, we are interested in the identification of sensitive receptors surrounding the proposed construction site and appropriate recommendations and strategies to mitigate their exposure. | As stated in section 4 .4 .1 .2 .1 for mitigation of air quality impacts during construction. An Air Quality Management Plan should be prepared prior to construction phase of the Project. A Best Management Practice Plan should be prepared to identify dust and odour impacts associated with the construction phase of the Project and mitigation measures. These plans will identify potential sensitive receptors surrounding the proposed construction site, including: •residences •hotels/motels •nursing/retirement homes •hospitals •noise sensitive buildings such as schools and places of worship. Based on the above types of sensitive receptors the exact list of receptors should be developed during the Detailed Design phase of the project when the construction schedules, allocation of construction equipment, and construction areas become available. The AERMOD air dispersion modelling should be used to predict the impact on sensitive receptors. Based on modelling results in combination with the baseline air quality data the mitigation strategies should be developed for all contaminants of concern. | 1 | C | | | C |

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| 94 | TPH - Air Quality | | The EPR also undertook a review of all documents, plans, policies, guidelines and environmental assessment studies related to this project. In particular, a report which relates to the East Bayfront Transit Class Environmental Assessment provided air quality commitments dealing with construction related dust and airborne emissions which may cause adverse health effects. Staff at Healthy Environments would be in agreement with the mitigation strategies put forth in this report which include adequate dust measures, a Dust Control Plan which is developed in consultation with Toronto Public Health, regular dust monitoring, and the application of water and calcium during construction as required. | Noted. The supported mitigation measures will be maintained moving forward. | 1 | P | Consideration be given to periods of adverse air quality events such as smoke arising from wildfires, other natural or man-made sources that would trigger an air quality advisory, and/or other air quality emergencies declared by any government agency. During these periods, it is expected that activities related to the development/construction of the Waterfront East LRT will be appropriately adjusted to follow any recommendations or directives from Toronto Public Health, Ministry of Environment, Conservation and Parks or other agency with a mandate to protect human receptors. This may include temporarily ceasing any activities that may contribute or further worsen the air quality event for which the advisory has been issued. | Noted. This has been included in section 4.5.1.2.1 and in Exhibit 7.4. Closed per follow-up response dated May 24, 2024. | C |
| 95 | TPH - Air Quality | | The report also identifies sensitive receptors which include, but are not limited, permanent or seasonal residences, hotels and motels, nursing and retirement homes, rental residences, hospitals, campgrounds, noise sensitive buildings such as schools and places of worship. Staff at Healthy Environments also note that some groups are at greater risk due to age (children and the elderly) and/or underlying medical conditions | Noted. Applying an equity, diversity, and inclusion lens to the assessment process is appropriate. The Air Quality Management Plan noted above can serve to do this. This is noted in Section 4.4.1.2.1. | 1 | C | | | C |
| 96 | TPH - Air Quality | | Ontario's air quality is regulated under the Environmental Protection Act and Ontario Regulation 419 "Air pollution – Local Air Quality." The EPR states an air dispersion modelling approach will be taken. It is appropriate to compare the modelled effects to the Air Quality Health Index and the Ambient Air Quality Criteria set by the Ontario Ministry of Environment, Conservation and Parks. | Noted. The AERMOD modelling results, which should be obtained during the Detailed Design phase of the project, should be assessed against the Ambient Air Quality Criteria (AAQCs) introduced in the province of Ontario by the Ministry of the Environment, Conservation and Parks (MECP). For completeness of the Air Quality Study the applicable Canadian Ambient Air Quality Standards (CAAQS) could be used as well. This is noted in Section 4.4.1.2.1. | 1 | C | | | C |
| 97 | TPH - Noise and Vibration | | The noise and vibration impact assessment will consider the predicted noise and vibration of the proposed LRT project. Based on the information in the report, the project is anticipated to achieve the proposed design goal of not surpassing the ambient values for residences situated at least 15 meters from the track centreline in all scenarios during daytime as well as during night time. However, they advise that streetcars traveling at 60 km/hr during the nighttime hours may be 4 dB above the design goal of the project. This is still below the levels that would likely trigger any mitigation as ambient noise level due to traffic is 55 dB. | Noted. | 1 | C | | | C |
| 98 | TPH - Noise and Vibration | | Along with the predicted noise once the project is complete, staff at Healthy Environments would like to ensure that construction noise from the project do not exceed levels set out in Toronto Municipal Code, Chapter 591, Noise Bylaw. According to the report, it is not predicted that noise or vibration mitigation will be required based on the criteria set out in the TTC design manual noise and vibration criteria. However, staff at Healthy Environments note that a noise and vibration study as well as appropriate monitoring should be conducted throughout the duration of the construction project to ensure nearby receptors are not subjected to levels which may result in adverse health effects Toronto Public Health provides guidance on noise-induced hearing loss. Noise-induced hearing loss is unlikely when average daily exposure (24 hour) to noise is below 70 dBA. | Noted. Chapters 4 and 7 already include the following: "Confirm noise and vibration monitoring requirements at detailed design in accordance with City of Toronto Municipal Code Chapter 591 Noise, City of Toronto Municipal Code Chapter 363 Building Construction and Demolition, and Vibration Control By-Law, 514-2008." | 1 | C | | | C |
| 99 | TRCA | | The LRT work from Silo Street to the Distillery Loop and Villiers Island has reportedly been addressed in the 2010 and 2014 Lower Don Lands Infrastructure Master Plan EA's and are not being assessed under this project. Please confirm that there are no new EA's or assessments needed for the LRT to be implemented, especially considering this is planned to be built by the 2031 target timeline. This is also important to know and understand given the area between Silo Street, and Villiers Island remains within the TRCA regulatory floodplain at the current time. Please confirm that the future LRT on Villiers Island has been coordinated with Waterfront | The 2014 LDL Environmental Assessment Master Plan Addendum will not expire as construction has started. However, it may require an addendum to address some planned changes to the project. The future LRT on Villiers Island forms part of the same project as the future LRT along Queens Quay East, and thus there is close coordination across the areas. It has only been segmented for the purposes of environmental approvals. | 2 | C | No further comments. Any EA addendums for the LDL Environmental Assessment must come to TRCA for review and comment. | | C |
| 100 | TRCA | | A portion of the study area is currently located within the Central Waterfront Screening Area (e.g., Yonge and Jarvis slips). The Central Waterfront Screening area generally incorporates the extent of the waterfront from Bay to the west side of Parliament slip for this study. Areas east of Parliament slip, including those within the Port Lands are currently regulated by TRCA and permits are required at present time. For permitting and detailed design stages of this project that cross into this area, the proponent will not be subject to TRCA permitting and the proponent will need to engage Ports Toronto along with possibly other provincial, federal and municipal agencies at the time of design/permitting. Please note that at the detailed design stage, TRCA does offer the TRCA Voluntary Project Review (VPR) process to be followed as appropriate. Through the VPR, TRCA would undertake a review of the proposed project. TRCA staff will provide further input on these areas as the EA progresses and when more information is provided to TRCA staff. | Noted in chapter 5/6. | 1 | O | As of right now, the project area between Bay Street to the west side of Parliament is within the screening area and will not need a permit beyond the commenting through this EA. Please advise during detailed design if City would like to engage in VPR process. For area from Parliament street and east (to Street A) within this EA scope, permits are required at the current time. Permit requirements to be provided as proposal moves forward and implementation timelines are clarified. | The proponents intend to engage in the VPR process for the relevant project components within the screening area, west of Parliament Slip. It is important to note also that TRCA has been and will be engaged in the design process for major works occurring within the screening area as part of this project (e.g. Yonge Slip lakefill). The commitment to participate in VPR has been added to Section 7 of the EPR. | C |

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| 101 | TRCA | | <p>Please provide clarity on how the Yonge, Jarvis, and Parliament Slip projects fit into this EA. Are these lake filling/slip development proposals a part of this EA or are they proceeding under separate approvals with separate requirements?</p> <p>For example, TRCA staff have already been engaged for Parliament Slip. TRCA staff have provided comments to Waterfront Toronto, and it is understood that for Parliament Slip, additional planning approvals will be required and TRCA staff will be circulated as per our typical process.</p> <p>Please clarify the process that lake filling and redevelopment for both Yonge and Jarvis Slip projects will take.</p> | Approvals for work in the Yonge Slip are being sought through this TPAP. Approvals for Jarvis Slip and Parliament Slip do not fall within the scope of this TPAP. | 2 | O | <p>Please clarify whether Jarvis and Parliament Slip work will undergo a separate EA process or if they have undergone an EA process already. The EA document should identify that this slip work is not included as part of this TPAP and will undergo a separate process.</p> <p>Additionally, while specific slip work may be deferred to a separate EA approval process, transit infrastructure is proposed that directly relates to slip work (ex: Parliament Slip). Please see additional comments below with respect to shoreline hazard.</p> | The work at Jarvis slip is no longer moving forward. The team understands that work at Parliament slip is approved separately through previous EAs, and the slip fill work at Parliament is not included as part of this project or TPAP. To clarify this as requested, additional language has been included in the EPR, section 2.3.4. Comments regarding shoreline hazard are responded to in the Comment #64 response. | C |
| 102 | TRCA | | If Yonge, Jarvis and Parliament slip development projects are proposed under this TPAP, it is recommended that more information including drawings be added to the EPR showing the proposed activities for these areas. Please add this to the TPAP so TRCA staff can comment more clearly on the proposed works. | As noted above, only Yonge Slip is included in this TPAP. The Yonge Slip has been designed to a 30% level of design, as part of the QQE project. Drawings L-DET-011-013 and L-DET-011-014 detailing the design from the 30% submission will be appended to the TPAP for reference. Designs are subject to change as detailed design progresses. | 1 | C | No further comments. Please advise during detailed design if City would like to engage in VPR process for Yonge or Jarvis Slips. | | C |
| 103 | TRCA | Appendix N | Shoreplan Queens Quay East Dock Walls (Shoreplan 2021): Part of the LRT alignment (Parliament slip and East Node area) is within the Lake Ontario coastal hazard areas. TRCA recommends that the designs incorporate coastal floodproofing from the 100-Year lake level of 76.2 m plus a 0.3 m freeboard, in addition to the appropriate wave uprush analysis. | <p>Parliament Slip will be covered under a separate approvals process.</p> <p>TRCA guidance as noted is being followed for the Parliament Slip scope of work, as per the design drawings submitted for peer review in June 2023.</p> | 2 | O | Please see the comment below. | Response below | C |
| 104 | TRCA | | <p>It appears that TTC/WT/City has retained a coastal engineer as part of this project to complete design work.</p> <p>a)Please confirm whether a coastal hazard assessment will be completed for this work. A coastal hazard assessment should be completed for any infrastructure within the lake hazard zone given the proposal. Additional comments pertaining to fill that could alter hazard patterns may be provided.</p> <p>b)Please confirm that the future stations, track work, and the East portal will not be impacted by high lake levels when considering wave uprush in unprotected areas.</p> | <p>a) For the purpose of determining natural hazards the shorelines within Toronto Harbour are classified as "artificial shorelines" according to the MNR Technical Guide (2001). New shoreline structures will be designed to address the hazards according to accepted engineering practice.</p> <p>b) Wave uprush was not considered as part of the SWM Report but the portal is designed to pump up and over to the storm sewer system, so it could be hydraulically disconnected from the lake level. Based on 13017.101.R1.RevA_FloodCharacterization (portlandsto.ca) the 100 year flood level at Toronto was recommended as 76.05m with a 5m horizontal setback from the 76.05 m contour. Portal grades should be looked at further and compared to the uprush criteria noted above in detailed design stage.</p> | 4 | O | <p>The most recent Coastal Data for the area is from TRCA's Shoreline Hazard Mapping Update (Baird, 2022). The most up-to-date 100 Year Lake Ontario Water Level is 76.2 masl IGLD1985 or 76.09 masl CGVD28. The hazard is then set 5 m back from the 100 Year lake level. Please reference the most up-to-date information in detailed design, and contact Zack Carlan to receive the Shoreline Hazard Maps and Report for reference.</p> <p>As per the initial comment, when completing the analysis for all areas of shoreline hazard in the project area (Yonge, Jarvis, Parliament), the proposed LRT infrastructure, roads, portal, etc., should be outside of the hazard as identified above.</p> <p>Typically, as per TRCA Living City Policies, there is also a development setback applied for all development/infrastructure from the shoreline hazard (10m). This will be further discussed at detailed design when the coastal hazard assessment has been completed.</p> <p>This should be included in the EA document if it will not be completed as part of the EA process, and will be a detailed design exercise.</p> | For this project, LRT infrastructure and road are expected to be located outside of the future Hazard Area. The planned lakefilling activities are expected to move the Hazard Area limit outside of the LRT alignment. This will be addressed further with TRCA input in the project detailed design and through the VPR process. | C |
| 105 | TRCA | | TRCA issues Shoreline Hazard Watches and Warnings when there is a potential for high water levels and waves along the Lake Ontario Shoreline that could lead to flooding and erosion. If this area falls within the Lake Ontario hazard, then there may be periods where there is a risk to the public and infrastructure. Please refer to our website for more information: https://trca.ca/news/lake-ontario-2020-water-levels/ | Noted. | 1 | C | No further comments | | C |
| 106 | TRCA | | Please confirm that the new Don River commissioning will occur prior to construction of the Waterfront East LRT to ensure that the riverine floodplain is no longer an issue. | Yes, this is the current thinking at the moment. However, the new Don River falls outside of the geographic scope of this TPAP. | 1 | C | No further comments. For area from Parliament street and east (to Street A) within this EA scope, permits are required at the current time. | | C |
| 107 | TRCA | | Please confirm that this work is being coordinated with the Inner Harbour West Tunnel project. | Yes, coordination is ongoing. Specific areas of coordination include the Jarvis and Yonge drop structures. Continued coordination is noted as a future commitment in the EPR. | 1 | C | No further comments. | | C |
| 108 | TRCA | Section 4.10 | Please ensure section 4.10 is updated and circulated to TRCA in subsequent submissions of the EPR as it is noted that this section is still being updated. | This has been incorporated into this draft submission. This content now lives in Chapter 5. | 1 | C | Laydown area is proposed on the east side of Parliament Slip where there is existing floodplain. Additional comment to be provided as project moves forward. No further comments | | C |
| 109 | TRCA | 149 | On page 149, it is noted that permission from TRCA will be required to enable the proposed tree removals and injuries. Please note that for a majority of the study area, the proposed tree removals would only need approval from City of Toronto as these trees are mostly street trees and not part of a TRCA regulated feature. Please revise this section and ensure to engage TRCA staff in detailed design if any removals are proposed for a regulated feature. | The Arborist Report for Segment 2 noted that 41 trees are located within lands regulated by Toronto and Region Conservation Authority. Pursuant to Ontario Regulation 166/06, 31 tree removals may require permit approval from TRCA. This is now noted in this section. | 1 | C | No further comments | | C |
| 110 | TRCA | 172 | <p>Please remove TRCA as a relevant regulatory agency from the following sections of the EPR. These are generally on page 172.</p> <ul style="list-style-type: none"> -Transit project potentially affects extirpated, endangered, threatened, etc. species -Transit project potentially affects fisheries or fish habitat -Transit project potentially affects environmentally sensitive areas (ESA) -Transit project potentially affects natural heritage features -Transit project potentially affects recreational areas | This table has been removed from the EPR. Only agencies that will be engaged will be noted, but they will not be tagged to a specific environmental "topic". TRCA will be included in this list as they have been engaged to date. | 2 | C | No further comments | | C |

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| 111 | TRCA | | TRCA restoration staff are available to assist with the implementation of associated habitat re-creation in and around the project areas. Staff can provide further input into this aspect of the project as the EA proceeds. | Noted. | 1 | C | No further comments. Please let TRCA staff know if City would like to further explore this opportunity and relevant staff can be identified as points of contact. | | C |
| 112 | Hydro One | General | There are references to Hydro One throughout the report and different names are used (HONI, Hydro One or Ontario Hydro). Could you please make sure that only the Hydro One reference is used throughout the report? | Yes, document has been updated to refer to name as Hydro One throughout. | 1 | C | | | C |
| 113 | Hydro One | General | On page 85 of the report there is a reference to Hydro One's Power Downtown Toronto Project. Please ensure that the days you are referencing are aligned with the status of the project as outlined on Hydro One's website (https://www.hydroone.com/about/corporate-information/major-projects/power-downtown-toronto) | Based on the project website, it is identified that work is expected to complete in 2026. Propose adjusting to the following wording: "Based on information available from the Hydro One project website, the construction of the new transmission cables is currently expected to complete in 2026." | 1 | C | | | C |
| 114 | PortsToronto | General | PortsToronto has no objections to Waterfront East LRT Transit project following the Rail Project Assessment Process. We are supportive of this important transit project in the City of Toronto | Noted. | 1 | C | | | C |
| 115 | PortsToronto | General | We would like to initiate discussion with Waterfront Toronto / City of Toronto about transactions related to the impact of the proposed scope of the LRT project on lands and waterlot owned by PortsToronto. As a part of these discussions, PortsToronto will introduce a strategy for development of a pier and Cruise Ship terminal at this location. The pier would extend from the southeast corner of the Yonge Street Slip further south into the Inner Harbour. The pier and the terminal would become a focal point for continued growth of the cruise ship industry in Toronto which has seen record numbers of cruise ships over the past few years, bringing with them important contributions to Toronto's tourism and economy. This pier would also address what appears to be a loss of space for marine transport that is currently utilizing the Yonge Street Slip (or future opportunities for it), as operated both by PortsToronto and Waterfront Toronto on east and west side of the slip (the proposed East LRT project layout does not seem to leave much room for this important marine activity). Since the introduction of a pier and terminal could potentially have implications on the design of the Waterfront East LRT Transit project, these discussions should be initiated at your earliest convenience. | To be addressed through coordination during the 60% design phase. | 1 | O | | <i>This comment is considered closed based on PortsToronto response from 2024-04-25.</i> | C |
| 116 | PortsToronto | General | It does not appear that the Environmental Study Report addresses work within Younge Street Slip itself. Is there a separate study (document) that will look at environmental impacts on the slip from the proposed construction? | Further information regarding study of the existing conditions, potential impacts, and mitigation measures was provided via email on 2024-04-25. | 1 | O | | <i>This comment is considered closed based on PortsToronto response from 2024-04-25.</i> | C |