



# EELRT Comment Tracker - Infrastructure Ontario

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 1 = Will comply  
 2 = Discuss, clarification required  
 3 = No new action

**\*\* Status:**  
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Contract Name: EELRT 10% Design and TPAP

Document Name: EELRT - Draft Environmental Project Report Rev01

Transmittal Ref: T018

Distribution Date: (03-08-24)

Meeting Ref: EPR Rev01

Contract Name: EELRT 10% Design and TPAP

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**
1	Infrastructure Ontario			<p>My comments are as follows.</p> <p>Infrastructure Ontario ("IO") is a crown agency responsible for the strategic management of the provincial realty portfolio on behalf of the Ministry of Infrastructure ("MOI"). Part of IO's mandate is to protect and optimize the value of the portfolio, while ensuring real estate decisions reflect public policy objectives. We appreciate the opportunity to provide feedback on the draft EELRT Environmental Project Report and at this time have no comments as there are no IO managed lands within the shown proposed alignment.</p>	Acknowledged.	3		C



# EELRT Comment Tracker -MX DSBRT

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No Comments									



### EELRT Comment Tracker - ECLRT

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Contract Name: EELRT 10% Design and TPAP      Document Name: EELRT - Draft Environmental Project Report Rev01  
Transmittal Ref: T018      Distribution Date: (03-08-24)  
Meeting Ref: EPR Comments      Contract Name: EELRT 10% Design and TPAP

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Follow-up Response	Status O / P / C**
No Comments									



**EELRT Comment Tracker - MX-SSE**

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EELRT 10% Design and TPAP      Document Name: EELRT - Draft Environmental Project Report Rev01  
Dist. Ref: T018      Distribution Date: (03-08-24)  
Prog Ref: EPR Comments      Contract Name: EELRT 10% Design and TPAP

Item No.	Description	Part, Chapter, Sec, Subsec, para, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Follow-up Response	Status O / P / C**
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**EELRT Comment Tracker - MTO**

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Contract Name: EELRT 10% Design and TPAP      Document Name: EELRT - Draft Environmental Project Report Rev01  
 Transmittal Ref: T018      Distribution Date: (05-16-24)  
 Meeting Ref: EPR Rev01      Contract Name: EELRT 10% Design and TPAP

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**	Follow-up Response	Status O / P / C**
1		Land Use		<ul style="list-style-type: none"> <li>The Ministry does not prefer 'normalizing' the on-ramp terminals with the off-ramp terminal, as it might increase chances of vehicles entering in the wrong direction.</li> <li>Further, depending on traffic volume, normalizing may create operational issues and queueing. Additional alternatives should be reviewed, analyzed, and evaluated from traffic operations and safety point of view.</li> <li>Re-alignment of the loop ramps are not designed to MTO standards.</li> <li>All geometric design components shall follow MTO standards and specifications within MTO Right-of-Way (ROW). Below are details of Ministry Standards and Regional Policies and Practices for geometric design:                             <ul style="list-style-type: none"> <li>Transportation Association of Canada (TAC) Geometric Design Guide for Canadian Roads</li> <li>MTO Geometric Design Supplement for TAC Geometric Design Guide</li> <li>Ontario Traffic Manuals (OTM) Book Suite</li> <li>Bikeways Design Manual (2014)</li> <li>Roadside Design Manual</li> <li>Roadside Evaluation Manual</li> </ul> </li> <li>The Bikeway Design Manual (2014) shall be used for the planning, design, application and operation of all new and rehabilitated cycling and active transportation facilities located within Provincial highway Right-of-Ways. Ontario Ministry of Transportation Library (gov.on.ca)</li> <li>At interchanges located within Provincial Highway ROW, the Bikeway Design Manual shall be used in conjunction with the Integration of Cyclists and Pedestrians at Interchanges Final Technical Report - March 2010.</li> <li>Within Provincial Highway ROW, the Ontario Traffic Manual Book 18 "Cycling Facilities" is applicable only when referenced in the Bikeway Design Manual. In the event of inconsistency or conflict between OTM Book 18 and the Bikeway Design Manual within provincial highway ROW, the Bikeway Design Manual shall take precedence and govern.</li> </ul>	Noted.  City will meet with MTO to clarify comments and coordinate with MTO in future stages of design.  <b>Post-Meeting Note:</b> City will need to conduct analysis to support ramp urbanization, confirm safety for cyclists, pedestrians, and motorists and demonstrate that the reconfiguration does not impact queue off-ramp traffic onto Highway 401. The exercise will be undertaken in future phases of the project, once it is appropriately scoped.  Next steps are outlined in the minutes from the meeting held with MTO on June 4, 2024.	1		C	The meeting was held on June 4, 2024 and additional details regarding requirements for MTO to consider ramp urbanization were discussed. These requirements have been added in more detail in the EPR future commitments.	C
2		Corridor		<ul style="list-style-type: none"> <li>As the proposed route passes through Provincial Highway infrastructure (Highway 401 and Morningside Ave. the applicant will be required to obtain permits for the encroachment of the Right-of-Way (ROW).</li> <li>Depth of Cover regulations shall be adhered to.</li> <li>Analysis of the Environmental, Traffic, Drainage impacts to the MTO ROW will also be analyzed.</li> <li>Work must coordinate with any MTO projects planned/ongoing in the area (Consider Mega B2 Project Scope)</li> <li>Traffic management Plans will be analyzed for any potential impacts along the ROW.</li> <li>All work within the MTO Permit Controlled Area will require relevant permits and shall adhere to Ministry standards and procedures.</li> </ul>	This has been noted as a future commitment in the EPR.	1		C		
3		Property		There are some lands within the study area that are owned by MTO. Should these lands be identified for the project needs, the applicant will be required to follow the requisite land assessment/procurement requirements as identified by the Ministry Property Office.	This has been added to Chapter 7, Permits (Provincial).	1		C		
4		Site Access		Site Access must follow Access Management Guidelines as per the Highway Corridor Management Manual Chapter 4.	This has been noted as a future commitment in the EPR.	1		C		
5		Traffic		The submitted Traffic reports and appendices do not contain any analysis of the Hwy 401 ramp terminal intersections at Morningside. Therefore, we are unable to determine the impacts this project may have on ministry-owned infrastructure.  An analysis (Synchro) of future ramp terminal operations should be provided for ministry review.	City will confirm with MTO the scope of the traffic analysis required near the interchange which will be undertaken during future phases of the EELRT.	1		C		
6		Drainage		MTO Drainage Office is satisfied with the submitted documents at this time.	Noted.	3		C		
7		Site Lighting		MTO Electrical Office is satisfied with the submitted documents at this time.	Noted.	3		C		



**EELRT Comment Tracker - MTO**

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8		Environmental		<ul style="list-style-type: none"> <li>•Phase I ESA Report: notes the recommendation of a Phase II ESA. Please advise if a Phase II ESA will be completed.</li> <li>•Natural Heritage Report: Section 5.3.3.4 Planting Plans – please ensure that any plantings are not within the MTO ROW or 14 m setback. If there are to be plantings within the 14 m setback, MTO environmental will need to approve the plans. Planting if permitted must be native and salt tolerant.</li> <li>•Noise and Vibration Assessment Draft: Please advise if MTO infrastructure was considered as part of the vibration assessment. Any construction activity causing vibration must be reviewed by MTO prior to the activity taking place as part of the "pre-construction consultation, inspection and monitoring program" and "monitoring of vibrations during construction" to the satisfaction of MTO.</li> <li>•General comment: please advise if there will be any soil to be stockpiled onsite. MTO does not permit soil stockpiling within the MTO ROW or 14 m setback.</li> </ul>	<p>Noted. A Phase 2 ESA has been recommended to be completed in future phases of the project. Once a Phase 2 ESA is completed, MTO will be notified.</p> <p>Further coordination with MTO will be required for planting, and construction noise and vibration impacts in future design stages.</p> <p>MTO infrastructure has not been considered as part of the vibration assessment at the 10% design stage. It has been noted to include considerations in future design phases.</p> <p>Necessary MTO approvals will be sought. This has been added as a future commitment in the EPR.</p>	1		C		
9		Geotechnical		<p>Groundwater was encounter approximately 5m below grade. Bore/core holes shall be carried out and reports submitted to MTO.</p> <p>Structural and Foundations Offices are analyzing the proposal and will continue to monitor submissions as they apply to structural elements in the proposed path of the EELRT. Further comments may follow regarding this submission.</p>	<p>Noted. In future phases of the project, borehole investigations will be undertaken as part of the geotechnical field assessment and resulting reports will be submitted to MTO. Bore hole requirements have been noted as a future commitment in the EPR.</p>	1		C		

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EELRT 10%									
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Meeting Ref: TAC Meeting #4 (		Contract Name: EELRT 10% Design and TPAP							
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Draft Environmental Project Report: Eglinton East Light Rail Transit Project									
			Table of Contents	N/A	N/A		While we failed to note this in April, we note now that the Table of Contents names Appendix F as "Cultural Environment Report". As the "cultural environment" includes archaeological resources, which are the subject of Appendix G, we recommend that the Table of Contents use the title of the report in Appendix F, namely "Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment."	C	Revised accordingly.
1			Throughout	In 2022, the responsibility for the administration of the Ontario Heritage Act and matters related to cultural heritage was transferred from the Ministry of Tourism, Culture and Sport (MTCS), formerly known as the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI), to the Ministry of Citizenship and Multiculturalism (MCM). The Draft EPR variously uses all three ministry names/abbreviations when referring to the provincial entity to be engaged on cultural heritage matters. These should all be changed to MCM, unless referring to interactions before 2022	All mentions of MTCS, MHSTCI have been revised to MCM in the EPR.	1	Resolved.	C	
2			4.5.1 Built Heritage Resources and Cultural Heritage Landscapes p. 182	In the first sentence of this paragraph, we suggest that "the built heritage and cultural landscape" be replaced with "cultural heritage conditions" to avoid confusion with defined terms such as those used in the subsequent sentence, as follows:  <i>A cultural heritage assessment was conducted in 2023 to document cultural heritage conditions the built heritage and cultural landscape and create an inventory of the cultural heritage resources within the study area</i>	This has been revised.	1	Resolved.	C	
3			4.5.2 Archaeological Resources p. 185	The subsections of this section reproduce more information from the Stage 1 Archaeological Assessment than is necessary and recommended to include in the body of the EPR. The Existing Conditions section on archaeological resources should briefly summarize the methods and findings of the archaeological assessment; it does not need to include the historical and geological background presented in the archaeological report. We suggest deleting Sections 4.5.2.2 and 4.5.2.3, except for the findings at the end of 4.5.2.3. These could be expanded upon to include the specific findings summarized in Section 3.1 of the Stage 1 Archaeological Assessment. We suggest the following format:  <i>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.</i>  [Then include the outcomes and recommendations of the report, as presented in its Executive Summary	This section has been revised. The recommendations from the impact assessment report are addressed in the Impact Assessment section of the EPR (Chapter 5)	1	We note that Section 4.5.2 has a new format and do not have any comments or concerns. However, we note a possible editorial error affecting the meaning of the first paragraph: in the final sentence, "recommending" or a similar word is likely missing before "further archaeological assessment".	C	Revised accordingly.
4			5.5.1 Built Heritage Resources and Cultural Heritage Landscapes p. 238	In several instances in this section, the abbreviation "CHR" is used where the intent was likely "CHL". The proposed mitigation strategies should provide more detail about CHERs and HIAs to be completed, including the timing, authorship, and circulation for review. We offer the following sample text:  <i>Should it be determined that there is no other technically feasible option than to encroach on to this property, a HIA will be undertaken by a qualified person as early as possible during detailed design, and developed in consultation with, and submitted for review to, the MCM and interested parties including the municipal heritage planner and/or municipal heritage committee and Indigenous Nations, as appropriate. A heritage permit may be required and further consultation with heritage staff at the municipality is recommended.</i>  <i>As noted in the letter above, we reiterate that where potential resources are to be directly impacted, the CHER is to be completed during the TPAP phase.</i>	This has been added to the report.	1	Resolved. We observe that Section 5.5.1.1 has been added, noting the preliminary results of the CHERs. For clarity and consistency with the regulatory framework, we recommend that the second paragraph be revised as follows:  (remove red) ...none of the properties along Morningside Avenue have historical, associative value, design, physical, nor contextual value are of cultural heritage value or interest (CHVI).	C	Revised accordingly.

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<b>EELRT 10%</b>	<b>Contract Name:</b> Design and TPAP	<b>Document Name:</b> EELRT - Draft Environmental Project Report
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5			5.5.2 Archaeological Resources p. 242	<p>This section should account for the possibility that the Stage 2 survey may result in the identification of archaeological sites, which would require Stage 3 and 4 assessment (site surveys and mitigation through excavation), and that of archaeological resources being discovered during construction, in spite of the completion of archaeological assessment.</p> <p>We recommend that the following paragraphs be added to the section where appropriate:</p> <p><i>The Stage 2 archaeological assessment, and any further stages of archaeological assessment recommended in the Stage 2 report, will be undertaken by an archaeologist licensed under the OHA as early as possible during the detailed design process and prior to any ground-disturbing activities.</i></p> <p><i>Should previously undocumented archaeological resources be discovered during construction, the person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the OHA. If the discovery includes human remains, the police or coroner shall also be notified.</i></p>	This has been added to the report.	1	Resolved.	C	
6			6.4 Future Communications and Engagement	The fifth bullet in this section should be revised to reflect our comment #4 regarding Section 5.5.1, with respect to the timing of CHER and HIA completion and review.	This has been revised.	1	Resolved. However, the final sentence of the fifth bullet should be deleted, given that the CHERs for directly impacted potential resources will have been completed by the time this EPR is circulated in its final form.	C	Revised accordingly.
7			7 Permits and Approvals p. 267	We suggest renaming this section "Permits, Approvals and Legislative Requirements" to capture things such as archaeological assessment review, which is triggered by legislation but is not a permit or approval per se (see comment below re Section 7.2).	This has been revised.	1	Resolved.	C	
8			7.2 Provincial p. 268	<p>MCM does not issue "approvals" for archaeological assessments or cultural heritage reports. We recommend that a bullet with respect to archaeological assessment be worded as follows:</p> <p><i>Obtain letters from MCM indicating that all Archaeological Assessment reports have been entered into the Ontario Public Register of Archaeological Reports, including reports that recommend no further stages of archaeological assessment for each property.</i></p> <p>A separate bullet could be added for the circulation of CHERs and HIAs completed pursuant the Cultural Heritage Report to MCM for review and comment.</p>	This has been revised.	1	Resolved with respect to the bullet referring to archaeology. As for CHERs and HIAs, MCM does not have an "acceptance" role; we recommend this word be changed to "comment". The CHERs and HIAs should also be circulated to City of Toronto Heritage Planning, Indigenous communities and other interested parties. This commitment could be made here or in another appropriate part of the EPR. The word "archaeological" should be removed from the bullet regarding CHERs and HIAs, as further archaeological investigations are captured under the previous bullet.	C	Revised accordingly.
9			7.3 Municipal p. 269	The project may also require approvals from the City for alterations to properties designated by bylaw pursuant to Part IV of the OHA	This has been added.	1	Resolved.	C	
10			Table 8.1 Commitments to Future Work p. 270	As noted in item #1 above, references to MHSTCI should be changed to MCM. In the two Cultural Environment rows of Table 8.1, in the "Agencies to be Consulted" column, this will also mean removing duplication, as there should not be two separate ministries indicated	This has been revised.	1	Resolved.	C	
11			Table 8.1 Commitments to Future Work Row – Archaeological Resources p. 280	It is unclear why "Indigenous Nations" appears under "Agencies to be Consulted" for the Built Heritage Resources and Cultural Heritage Landscapes row but not the Archaeological Resources row, especially given that "engagement with Indigenous Nations" is mentioned under "Future Commitment" in the Archaeological Resources row. The Standards and Guidelines for Consultant Archaeologists require that Indigenous communities be engaged at Stage 3 at the latest where identified archaeological sites are associated with their cultures, and Section 6.2.3 of the draft EPR notes that the Mississaugas of the New Credit requested to be included in site work associated with the Stage 2 assessment.	This has been added to the archaeology section.	1	Resolved.	C	



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12			Table 8.1 Commitments to Future Work Row – Archaeological Resources p. 280	As with Section 5.5.2 per our comment # 5, this row should note the possibility of additional stages of archaeological assessment that may be triggered by the results of the Stage 2 archaeological assessment, and the procedure in case of archaeological resources being discovered during construction. Further, while we recognize that the "Project Phase" field indicates "Preliminary and Detailed Design", we recommend that the commitment itself note that all required stages remaining at the time of TPAP completion take place as early as possible in the detailed design process, and well in advance of ground disturbing activities.	This has been added.	1	We acknowledge that the 5th bullet has been added to address this comment. However, the combination of two separate commitments into one bullet may create a misapprehension that the completion of remaining stages of archaeological assessment is related to or contingent upon the discovery of archaeological resources during construction. We recommend that this be divided into two bullets, as follows:  • Should the Stage 2 Archaeological Assessment result in a recommendation for further assessment, all required remaining stages at the time of TRPAP completion should will be completed as early as possible in the detailed design process and before any ground disturbing activities.  • Should previously undocumented archaeological resources be discovered during construction, the person discovering the archaeological resources shall cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the OHA. If the discovery includes human remains, the police or coroner shall also be notified.  This ordering of the bullets would reflect the chronological order of assessment and construction.	C	Revised accordingly.
<b>Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment</b>									
13			Table 1: Inventory of Known and Potential Built Heritage Resources and Cultural Heritage Landscapes within the Study Area p. 74	In the case of built heritage resources and cultural heritage landscapes that were identified during background research and field review, we recommend that the language of the "Description of Property and Known or Potential C.H.V.I." be revised to refer more specifically to one or more of the CHVI criteria found in Ontario Regulation 9/06, for example noting that a resource may be a representative example of a certain style, etc	Acknowledged. The wording of the descriptions has been revised as noted.	1	Resolved.	C	
14			Table 2: Preliminary Impact Assessment and Recommended Mitigation Measures Row – B.H.R. 3 p. 100	The direct impacts noted here include the potential to impact views to and from the BHR, and the potential to impact its setting through the addition of the landscaped tree planter. Impacts to views and settings are typically assessed as indirect impacts. It is unclear why they are considered direct impacts here.	Views and change of setting are no longer identified as an adverse direct impact for this property. Given views/setting are not identified as a heritage attribute, this has been removed from the impact assessment for this property. Given a HIA is recommended regardless due to encroachment, an assessment of impacts will be adequately addressed as the design progresses.	1	Resolved.	C	
15				The Cultural Heritage Report identifies a potential built heritage resource and a potential cultural heritage landscape that will be subject to direct impacts, and therefore require a resource-specific Cultural Heritage Evaluation Report (CHER) to determine whether they are of cultural heritage value or interest (CHVI). As noted in our letter of December 12, 2022, where a known or potential built heritage resource or cultural heritage landscape may be directly and adversely impacted, and where it has not yet been evaluated for CHVI, the CHER must be completed within the TPAP. This guidance is reflected in Recommendation #3 found in Section 8.3 of the Cultural Heritage Report. As such, the drafting of the EPR should assume that these CHERs will be completed by the time the final version of the EPR is submitted	CHERs will be completed by the time the final EPR is submitted.	3		C	
<b>Archaeological Resources</b>									

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16				<p>Our records indicate that the Stage 1 Archaeological Assessment (under Project Information Form # P094-0367-2023, included as Appendix G of the draft EPR) has yet to be submitted by the licensed archaeologist to MCM.</p> <p>Please note that archaeological concerns have not been fully addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:</p> <ol style="list-style-type: none"> <li>1. the archaeological assessment of the project area is complete, and</li> <li>2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through excavation or an avoidance and protection strategy.</li> </ol> <p>Proponents should wait to receive the MCM's review letter indicating that the report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities.</p> <p>Proponents must follow the recommendations of the archaeological assessment report(s). MCM recommends that further stages of archaeological assessment be undertaken as early as possible in the EA or detailed design process and prior to any ground disturbing activities.</p> <p>We strongly recommend that the licensed archaeologist submit the report as soon as possible, and that its findings be considered preliminary until a final version has been entered into the Register.</p>	Comment noted.	3		C	



### EELRT Comment Tracker - MECP TSS

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Sections 4.6.1 and 5.6.1 of the Eglinton East LRT Environmental Project Report (the EPR), dated March 4, 2024, and Appendix H of the EPR - Air Quality Assessment Draft Report (the AQA Report), dated February 13, 2024.									
1	Rui Zeng, Air Quality Analyst		Air Quality Draft Assessment Report (Appendix H)	Please identify contaminated areas along the proposed route and add a discussion in both the AQA and the EPR reports. If any contamination is present, an ambient monitoring program should be considered to address impacts at nearby receptors.	Comment noted. The Air Quality Assessment was updated to note the risk that ground contamination can impact air quality during construction.  The EPR also added a note: "Prior to construction the Phase 1 Environmental Site Assessment should also be reviewed to identify potential areas of ground contamination along the construction route. In addition to the dust suppression techniques, any areas that have the potential to emit other contaminants as a part of the fugitive dust should be reviewed further and consideration should be given to additional onsite monitoring at sensitive receptors for any site-specific contaminants identified."	1	No further comments.	C	
2	Rui Zeng, Air Quality Analyst		Air Quality Draft Assessment Report (Appendix H)	A few typos were noted in Table 2 of the AQA Report: The 1hr SO2 AAQC should be 106 ug/m3 instead of 100 ug/m3; the annual SO2 AAQC should be 10.6 ug/m3 instead of 10 ug/m3; the 1hr SO2 CAAQS should be 65 ppb instead of 64 ppb; the 1hr Acrolein AAQC should be 4.5 ug/m3 instead of 4.4 ug/m3. Please revise accordingly.	Comment noted. Report has been updated accordingly.	1	No further comments.	C	
3	Rui Zeng, Air Quality Analyst		Air Quality Draft Assessment Report (Appendix H)	Please provide supporting documentation for the traffic data used in Section 6.2 of the AQA Report.	Report has been updated accordingly.	1	No further comments.	C	
4	Rui Zeng, Air Quality Analyst		Air Quality Draft Assessment Report (Appendix H)	The meteorological data used for the dispersion modelling from year 1996 to 2000 is outdated. Please use updated versions of the meteorological data for future assessments.	MECP pre-processed data for the observation period of 1996-2000 was used in the assessment, as acceptable for permitting in Ontario and prescribed in O.Reg. 419/05.	3	Yes, the Regional meteorological data set is acceptable for air permitting purposes when assessing the maximum point of impingement. However, the Regional meteorological data set is not appropriate when assessing impacts at specific locations, such as sensitive receptors. For this reason, the ministry recommends to use a meteorological dataset from the nearest meteorological station(s) for the most recent five years for future assessments as noted in the Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MTO, May 2020).	C	This comment is acknowledged and will be incorporated in future phases of work. A future commitment has been included in the EPR to use a meteorological dataset from the nearest meteorological station(s) for the most recent five years for future assessments as noted in the Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects (MTO, May 2020).
5	Rui Zeng, Air Quality Analyst		Air Quality Draft Assessment Report (Appendix H)	Please clarify in Section 7.2 of the AQA report whether welding and soldering activities are expected to take place within the Maintenance and Storage Facility, and if so, whether these activities will cause air emission concerns.	Report has been updated accordingly. MSF will need to seek EASR or ECA approval for future metal work activities unknown at this time which will ensure compliance at the property line and beyond.	1	No further comments.	C	



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<b>Contract Name: EELRT 10% Design and TPAP</b>	<b>Document Name: EELRT - Draft Environmental Project Report Rev01</b>
<b>Transmittal Ref: T018</b>	<b>Distribution Date: (03-08-24)</b>
<b>Meeting Ref: EPR Rev01</b>	<b>Contract Name: EELRT 10% Design and TPAP</b>

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**	Follow-up Response
1	Environmental Assessment Project Coordination Unit (EAPC) Comments	Draft EPR	S. 1.2, 1.5, 4.6.1, 4.6.2, 7	As of February 22, 2024, O. Reg 231/08 has been amended and renamed as "Transit and Rail Project Assessment Process Regulation". Please ensure that is reflected accordingly in the final EPR.	This has been revised in the updated report.	1		C	
2	EAPC Comments	Draft EPR	S. 4.1.4.1	Please clarify/confirm that the proposed New Military Trail road will be undergoing a streamlined EA process under the Municipal Class EA process? A road project is currently subject to a municipal Class EA and not the transit project assessment process as per the Transit and Rail Project Assessment Process regulation.	The New Military Trail (new road) is needed to accommodate the EELRT and associated improvements to the public realm. The intent is for the TRPAP to cover the EA requirements for New Military Trail with design refinements to occur in coordination of the affected land owner (UTSC) in future phases of design. No streamlined EA is proposed to avoid "piecemealing".	2		C	The EPR will include a note in the future commitment section that a future Municipal Class EA for New Military Trail will be undertaken at a future stage, as required. The City will proceed with the TRPAP for the transit component of the project.
3	EAPC Comments	Natural Heritage Report and draft EPR	S. 5.5 and S. 5.4 Table 5-10 (Draft EPR)	Please explain in more detail why no impacts are anticipated to designated natural areas as a result of the proposed project.	The report has been updated (see Impact and Mitigations chapter).  <ul style="list-style-type: none"> <li>No impacts to designated natural areas are anticipated to accommodate the Eglinton East LRT as the EELRT will be constructed primarily within the right-of-way of existing municipal roads. For example, near Morningside Park and Highland Creek where the majority of ESAs and ANSIs are concentrated, the EELRT proposes no encroachment beyond the existing ROW.</li> <li>In locations where the existing ROW is proposed to be widened, the areas of encroachment do not consist of designated natural areas but generally of previously modified/disturbed environmental conditions.</li> </ul>	1		C	
4	EAPC Comments	Draft EPR	S. 6.2.3	Please provide records of consultation with Indigenous communities (emails sent, letters, etc) as soon as possible, prior to issuance of the notice of completion.	Comment noted. These will be provided to MECP in advance of the notice of completion.	1		C	
5	EAPC Comments	Draft EPR	S. 6.3.1, 6.3.2 and 6.3.3	Please ensure that these placeholders are updated	Comment noted. These sections will be updated as the TRPAP is advanced and consultation progresses.	1		C	This has been revised in the EPR
6	EAPC Comments	Cultural Heritage Report	S. 7.0	Phase Two consultation will have a second round of public meetings in late 2023. If these meetings have occurred, it should be included in the record.	Note has been updated in the report. Meetings have not occurred yet.	1		C	

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<b>Transmittal Ref:</b> T018	<b>Distribution Date:</b> (03-08-24)
<b>Meeting Ref:</b> EPR Rev01	<b>Contract Name:</b> EELRT 10% Design and TPAP

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**	Follow-up Response
7	Species at Risk	Natural Environment Report		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.	Comment noted. This has been included in Section 7.0 Approvals.	1	The document (Section 7) makes reference to contacting the Ministry of Natural Resources and Forestry for species at risk (SAR) related information. This should be corrected to MECP. If trees or buildings are to be removed or manipulated, SAR Bats should be considered.	C	This has been revised in the EPR
8	Toronto District Office	Noise and Vibration Report		1)According to the Noise and Vibration Report (NVR), the long-term operation of the MSF will exceed the NPC-300 guideline limits. By implementing some abatement measures, they believe the NPC-300 guideline limits will be met. They have proposed two main items to implement to achieve compliance: 'resilient wheels' on the LRT trains and a 2-metre-high noise wall, located along the property line of the facility. While an acoustic barrier is a proven noise abatement measure and can be modelled easier, the report achieves NPC-300 limits with the assumption that the "resilient wheels" will provide a 10dB reduction. <b>More information is needed on this specific abatement measure before making this assumption.</b>	This is a common mitigation measure for LRT trains. Refer to U.S. Federal Transit Administration / Transportation Research Board "TCRP Report 23" wheel Rail Noise Control Manual", 1997 ( <a href="https://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_23.pdf">https://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_23.pdf</a> ). It was noted in the EPR.	3	The district is concerned that there is not enough information provided to be able to rely on "resilient wheels" as a mitigation measure that can achieve compliance. More specifically:  -Which type of resilient wheels are planned to be used? -Are the planned wheels suitable for the speeds and frequency of use intended? -Are there measures in place to ensure that only these wheels are used and maintained if they are being relied on as a noise abatement measure?	C	A commitment in the EPR has been made to further explore these details and requirements in the next phase of design.  At the 10% design level, the details are yet to be confirmed.
9	Toronto District Office	Noise and Vibration Report		2)The NVR states that the impulsive noise sources associated with the MSF, such as decoupling of LRT cars, will be infrequent and have not been assessed further. Being that the MSF is a maintenance yard that will be performing maintenance activities (car decoupling, welding, hammering, etc.), potentially around the clock, impulsive noise sources should be assessed further.	Comment noted. The report has been updated to note that further work needs to be done in future phases to assess noise impacts and mitigations due to the MSF activities.  At this design stage, a recommendation for noise barriers, in the form of a 2.0 m high noise wall, located along the property line of the MSF was put forward for further evaluation in future phases.	1		C	
10	Toronto District Office	Noise and Vibration Report		The NVR states that emergency equipment (i.e., generators) operation could result in exceedances. While infrequent, these noise sources, and potential noise mitigation measures, should be investigated further.	Comment noted. The report has been updated to note that further work needs to be done in future phases to assess noise impacts and mitigations due to the MSF activities.	1		C	

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Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**	Follow-up Response
11	Toronto District Office	Noise and Vibration Report		<p>According to modelling, the NVR states that with noise mitigation measures implemented, all receptors are within acceptable noise limits, however, 1 Antelope Dr, Alvin Curling Public School and Extencicare Rouge Valley are very close to the limits (45-49dB vs 50dB limit). There is a possibility of complaints and/or concerns coming from these receptors, especially since the facility is slated to operate 24/7.</p> <p>A robust compliant response procedure needs to be implemented to ensure timely response of noise complaints and potential further corrective actions and/or mitigative measures are investigated and implemented.</p>	The noise guideline limits have been chosen by the MECP in their guidelines to minimize the potential for complaints. As the noise guidelines are met, complaints are unlikely. Regardless, complaints reporting and management procedures can be developed as the project proceeds. The MSF and other project components such as traction power substations will require MECP Environmental Activity and Sector Registry (EASR) registrations.	3	A robust noise complaint procedure should be a commitment – this comment was only acknowledged.	C	This has now been noted in the EPR.
12	Toronto District Office	Noise and Vibration Report		An acoustic audit should be performed when all mitigative measures are implemented to confirm dB reduction and compliance with NPC-300 limits.	Comment noted. A note has been included in the report.	1		C	
13	Toronto District Office	Drainage and Stormwater Management Report		During construction of the MSF, there should be great attention to sediment control measures to mitigate potential impacts to this watercourse.	Acknowledged. A sediment and erosion control plan will be developed and provided at the detailed design stage as it is currently only a 10% design phase.	3		C	
14	Toronto District Office	Drainage and Stormwater Management Report		There is no mention of this in the report, however there should be adequate controls installed in the proposed long-term stormwater management ponds (i.e., adequate resonance time, oil/grit separation, etc.) to ensure the effluent entering the watercourse is of adequate quality.	No ponds are proposed. OGS units are suggested as one of the BMP alternatives (please see Section 4.2 Table 4-3 of the report). Please note that Section 4.1.1 of the report specifies that stormwater quality control is to be provided to an Enhanced level of treatment.	3		C	
15	Toronto District Office	Drainage and Stormwater Management Report		<p>For the proposed Sheppard Ave E / McCowan Terminal station (4700 Sheppard Ave East), the proposed bus terminal is adjacent to a tributary of the Highland Creek.</p> <p>1)During construction, great care and monitoring of sediment run-off and impacts to connecting storm system to be taken to ensure no impacts to the creek.</p>	Acknowledged. A sediment and erosion control plan will be developed and provided at the detailed design stage as it is currently only a 10% design phase.	3		C	
16	Toronto District Office	Drainage and Stormwater Management Report		<p>For the proposed Sheppard Ave E / McCowan Terminal station (4700 Sheppard Ave East), the proposed bus terminal is adjacent to a tributary of the Highland Creek.</p> <p>2)During long-term operation, there needs to be thought into sewage works systems that would protect the creek from increased coolant and/or fuel spills (from buses).</p>	Acknowledged.	3	The incorporation of measures to protect the tributary and creek from spills and impacts should be included in the planning at this stage – not only acknowledged.	C	<p>The proposed bus terminal at Sheppard Ave E and McCowan is part of the Scarborough Subway Extension project currently underconstruction by Metrolinx.</p> <p>The EELRT project does not impact the terminal and considers it as an existing condition.</p>





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17	Toronto District Office	Air Quality Report		During construction of the LRT and MSF, dust and particulate matter (PM), could result in community concern and generate complaints.  1)Section 10.8 (Complaint Procedure) should also include weather conditions, specifically wind speed and direction, when a complaint is received. This will determine the exact source of the dust and assist in determining corrective actions.	Comment noted. Report has been updated accordingly.	1		C	
18	Toronto District Office	Air Quality Report		2)Dust suppression (using non-chloride dust suppressants) will be essential in reducing fugitive dust during construction, especially during dry periods. It is imperative that frequency of suppression applications is increased based on the current weather conditions. Monitoring of the surface conditions should be frequent.	Comment noted. Report has been updated accordingly.	1		C	
19	Toronto District Office	Air Quality Report		3)At the MSF construction area, monitoring of impacts to sensitive receptors (i.e., public school, residential neighbourhood, Extencicare facility) should be continuous. Project might benefit from automatic monitoring devices for PM for these sensitive receptors, especially if construction will take place over a period.	Comment noted. Report has been updated accordingly.	1		C	
20	Toronto District Office	Air Quality Report		4)At the MSF construction site, leaving vegetated areas and natural shrubs/tree in areas not currently under construction would assist in reducing fugitive dust emissions.	Comment noted. Report has been updated accordingly.	1		C	
21	Toronto District Office	Socioeconomic and Land Use Report		While it is understood that the Highland Creek Community Secondary Plan is still being developed, it is imperative to highlight that the potential impacts from the landfill site on Morningside Avenue should be considered.	Comment noted. Report has been updated accordingly.	1		C	
22	Toronto District Office			Erosion and Sediment Control  While it is understood that a detailed Erosion and Sediment Control Plan will be developed in later design states, it is imperative to highlight the importance to include frequent monitoring of watercourses for suspended solids during construction and long-term for the proposed stormwater management ponds and/or installed sewage works.	Comment noted. Report has been updated accordingly.	1		C	



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<b>Meeting Ref: EPR Rev01</b>	<b>Contract Name: EELRT 10% Design and TPAP</b>

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23	Toronto District Office			<p>Excess Soil Management</p> <p>While it is understood that a detailed Excess Soil Management Plan will be developed later, it is imperative to highlight the importance to the Ministry for the Project Constructor and Metrolinx to implement a cradle-to-grave approach and comply with O. Reg. 406/19 and other applicable regulations.</p> <p>1)Plans and procedures should be implemented to ensure soil is properly tested and characterized, stockpiled on site, hauled (with licensed haulers) and disposed of at legitimate receiving sites (i.e., beneficial re-use sites and/or registered disposal sites).            2)The project should have a robust tracking system to ensure all soil leaving the site is being taken to the correct location (as described in a soil destination report).            3)Hauling of soil should be performed by vetted haulage companies. To ensure all soil is being hauled transparently, it is best to deal directly with the haulage company and not a third-party company.            4)Contingency receiving site list should be compiled in case receiving sites reach capacity and/or are no longer accepting soil.            5)Ensure the Soil Registry is kept up to date with receiving sites and soil movement.</p>	Comment noted. O.Reg 406/19 is noted in the EPR.	1		C	





**EELRT Comment Tracker - MECP HG**

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<b>Transmittal Ref: T018</b>		<b>Distribution Date: (03-08-24)</b>						
<b>Meeting Ref: EPR Rev01</b>		<b>Contract Name: EELRT 10% Design and TPAP</b>						

Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	Comment	HDR Response & Details	Action 1 / 2 / 3*	Follow-up Comment	Status O / P / C**
1	Charles Wakefield			The City of Toronto / TTC should be prepared to apply for either Environmental Activity and Sector Registry (EASRs) or Permits to take Water (PTTWs) in areas where they anticipate lowering the groundwater levels to below elevations of proposed foundation footings.	Comment noted. PTTW has been highlighted as a provincial permit that may be required. EASRs have been included in Chapter 7.2.	1	HDR response has addressed the comment.	C
2	Charles Wakefield		Geotechnical Desktop Study Report	The Peto MacCallum Ltd. (Peto) indicated there was the potential for fill to be encountered in some areas (Peto, Section 7, p.8) and this fill may be unsuitable for foundations. It should be noted that many of the ravines on Toronto were partially filled with waste historically, so these fill materials may also be unsuitable to support foundation footings.	This has been noted in the body of the EPR.	1	HDR response has addressed the comment.	C

**EELRT - Environmental Project Report Comment Tracker**

Comments TRCA

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Transmittal Ref: T018		Distribution Date: (03-08-24)								
Meeting Ref:		Contract Name: EELRT 10% Design and TPAP								
Item No.	Reviewer	Description	Part, Chapter, Sec, Subsec, page, DWG#	TRCA Comment	HDR Response & Details	Action 1 / 2 / 3*	TRCA Follow-up Comment	Status O / P / C**	Project Team Follow-up Response (2 Aug 2024)	Status O / P / C**
<b>14 September 2023 Comments</b>										
1		General		1. For the Conlins MSF, the limits for flood plain, drip line, and top of bank (TOB) / long term stable TOB will need to be established at the EA stage. A 10 m development setback from the greatest inland hazard should then be applied to the site. Hazard limits and setbacks should be established for the top and eastern edges, and possibly the southern section based on existing conditions updates and modelling, depending on where the TOB and flood plain land. This should all be identified in a high level figure at this stage as this will impact facility design.	Discussion required with TRCA as the subject area is an online stormwater management facility.		Comment deferred to 30% design.	C		
2		General		2. TRCA staff requests that a site visit be arranged to investigate and delineate/stake the boundaries of the features at the Conlins MSF site, specifically wetland and dipline, prior to subsequent design stages. Top of bank staking is referenced in the next section.	No site visits are proposed to be undertaken for the purposes of drainage and stormwater management as part of 10% design and TPAP. This item can be included as a commitment for future phases to confirm the boundaries of features prior to 30% design.		Site visit to be scheduled for Fall 2023.	C		
3		Geotechnical		3. For the Conlins MSF, the geotechnical study should determine the erosion hazard limits around the site. A 10 m setback will need to be established from the erosion hazard (or the greatest inland hazard including flood plain).	Noted.					
4		Geotechnical		4. In addition, the MSF top of bank will need to be identified as part of the process. A top of bank staking by TRCA staff may be needed in addition to the slope stability study to determine the erosion hazard limits.	Noted. This will be done in future phases of design.		Site visit to be scheduled for Fall 2023.	C		
5		Planning Ecology		5. Please include a commitment to provide an NHS at the EA stage. The Morningside-Highland Creek Valley –embankment works need to be assessed to evaluate the impact of the works on the Provincially Significant Highland Creek – Morningside Wetland Complex and valley. Furthermore, a commitment to minimizing and mitigating the impacts to the wetland complex/associated valley and providing appropriate restoration and compensation in instances of unavoidable loss needs to be provided. These provisions should further be built into the project design.	A Natural heritage impact study will be completed at the TPAP stage to identify impacts and mitigations to natural features. Discussion required with TRCA as the subject area is an online stormwater management facility.					
6		Water Resources		6. Please note that at the 30% design stage, a hydraulic analysis is required for all crossings and the MSF site area. For the two (2) crossings at Sheppard Avenue where it seems that the bridge will be widened, the hydraulic analysis should inform the proposed bridge span to ensure that there are no impacts to the 2-year to 100-year, and Regional design storm water surface elevations and velocities under proposed conditions when compared to existing conditions. For the Morningside crossing, it seems that the bridge will not be widened; however, there will be minimal impacts to the road right of way immediately north and south of the existing bridge, and as such, a hydraulic analysis will be required to confirm that there are no impacts to the 2-year to 100-year, and Regional design storm water surface elevations and velocities under proposed conditions when compared to existing conditions. As per the meeting discussion, it is noted that the project team will prevent any encroachment within the Highland Creek floodplains to the degree technically feasible, by minimizing road right of way width and through the use of retaining walls.	Noted. This will be included in the EPR as a commitment for future design phase.					
7		Water Resources		7. For the MSF site, as per meeting discussion, please update the existing TRCA HEC-RAS model with an updated existing conditions to update the 2-year to 100-year design storms and Regional floodplain. The updated HEC-RAS model and hydraulic report with supporting information (topographic survey, bathymetric survey and/or as-built drawings to verify existing conditions) should be submitted to TRCA for review and comment at the earliest opportunity. Please ensure that there is a minimum 10 m setback from the updated TRCA Regulatory floodplain and the proposed development, or the greater of the hazard limit (including long term stable top of bank).	The HEC-RAS modelling will be updated, subject to clarification of study requirements given the use of the area for online stormwater management. Discussion also required regarding acceptable methodology for assessing hydraulics of the closed conduit.		Comment deferred to 30% design.	C		
8		Water Resources		8. At 30% design, a fluvial geomorphology study is required for the Morningside crossing to inform any erosion protection measures for the existing bridge abutments, and due to the enlargement of the road right of way on both sides of the existing bridge.	Noted. This will be included in the EPR as a commitment for future design phases.					
9		Water Resources		9. A conceptual incremental and cumulative cut and fill analysis is required at the 30% design stage at every 0.3 m increment for the 2-year to 100-year design storms and the Regional design storms for all crossings. The cut and fill analysis can be further refined based on topographic data and grading during the 65% design stage. This is to ensure that there is no loss in riparian storage due to the proposed works.	Noted. This will be included in the EPR as a commitment for future design phases.					
10		Water Resources		10. For the stormwater management, please meet the TRCA SWM Criteria (2012; link here: <a href="https://sustainabletechnologies.ca/app/uploads/2013/01/SWM-Criteria-2012.pdf">https://sustainabletechnologies.ca/app/uploads/2013/01/SWM-Criteria-2012.pdf</a> ). Please note that TRCA requires water quantity controls and erosion hazard controls (also known as the 5mm on-site retention). For water quantity controls, existing peak flows should be met under proposed conditions for the entire catchment area for road right of way. For erosion hazard controls, 5mm on-site retention is required from all impervious surfaces above the initial abstraction. Please note that water quality treatment is required prior to infiltration.	This will be addressed through the development of the stormwater management plan for the subject property.					
11		Water Resources		11. For stormwater management, TRCA recommends 80% TSS removal for water quality treatment as part of a treatment train approach. For this recommendation, please note that an OGS sized for 80% TSS removal for 90% of the annual rainfall is credited 50% TSS removal. However, an OGS plus 5mm on-site retention (required as part of erosion hazard control) is credited 80% TSS removal.	This will be addressed through the development of the stormwater management plan for the subject property.					
12		Water Resources		12. In addition, in the meeting minutes, please revise the wording in Section 4 to, "If the watercourse is fully concrete, a fluvial geomorphology study would not be needed. However, if a watercourse is only partially concrete, then a fluvial geomorphology assessment is required at the 30% design stage."	Noted. Will comply					
<b>EPR Comments (08 March 2024)</b>										
1	Paul Leithwood		Email Response to EPR Circulation	<p>City: See below. Since we are aware of the new regulations we should begin updating the report to reflect, including the appropriate future commitments. I think we should begin to plan out a meeting with TRCA before NOC to help ward off any risks to our timeline.</p> <p>TRCA: Thank you for your patience. Our technical staff are still reviewing the draft EELRT Environmental Project Report. I am anticipating comments to be turnaround Thursday of this week and I am aiming to have our formal response to you by Wednesday April 17.</p> <p>I apologize for the delay in our comments and communication, as you are more than likely aware we are undertaking the implementation of our new regulation that came into effect on April 1, 2024, and this has impacted our timelines.</p> <p>In the meantime, please reach out if you have any questions or concerns.</p>	<p>Future commitments will be updated.</p> <p>The previous Conservation Authority regulations were replaced by the attached O.reg 41/24. With respect to the MSF site, the provision of most significance is the Regulatory Allowance for TRCA is now 15 m from the greatest natural hazard; the Authority was previously applying a 10 m regulatory allowance for the reach through the MSF site.</p> <p>When the project starts-up again, it is suggested a meeting with TRCA to review the previously established corridor configuration, and confirm whether or not revisions would be required in light of the attached. FVI, the attached also makes provisions for some works within the limits of the regulated area, which would not require permit or approval; I don't see much wiggle room for the MSF site specifically, however that would nevertheless be something to broach with TRCA once the project starts-up again.</p>	3		C		

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2		General - Fees	This application is subject to a \$24,250.00 application review fee (Municipal Class EA – Schedule C – Major) as per our Fee Schedule. For payment options, refer to How to Pay TRCA Review Fees. Ensure your accounting department references CFN 68286 when making payment. Please let the planner know if an invoice is required.	Comment noted. The City will confirm next steps regarding this item.	2	Unaddressed currently. Please advise and an invoice can be provided.	C	Please provide Transit Expansion an invoice, refer to details as per correspondence with the City PM.
3		General – Communications	Add Johanna Kyte (johanna.kyte@trca.ca), Government and Community Relations Specialist to the project mailing list to receive any public information updates.	Comment noted. City has added Johanna Kyte to the mailing list.	3	Acknowledged.	C	Transit Expansion confirms that Johanna Kyte has been added to the project mailing list, as well as the intergovernmental review team contact list for the next phase of work.
4		TRCA owned Property	Be advised that there is TRCA owned property located directly adjacent to the work areas located near or at: • Burrows Hall Park (southwest of Sheppard Avenue and Lapsley Road); • Morningside Park (west of Morningside Avenue). Confirm that the extent of proposed works, including any temporary staging or storage areas and access, will not encroach onto TRCA property. Should there be encroachment on TRCA owned lands as shown on Drawing No. RA1000-03-RP102, Sheet 2 of 3, that the proposed Right-of-Way (ROW), is set to encroach Burrows Hall Park provide rationale and clarify the extent as much as reasonably possible at this stage of the design. Note there may be the need for a slope stability and erosion hazard assessment, to identify the risk and to develop appropriate measures to address the potential risk of the expanded ROW.	The bridge crossing at Sheppard Avenue and East Highland Creek near Burrows Hall Park will need to be widened to accommodate the proposed LRT. The extent of this work (whether full replacement or rehabilitation and widening) has yet to be determined and will be confirmed in future phases of the study. The footprint of the bridge structure after widening will remain within the existing available City right-of-way. Temporary encroachment into the adjacent banks may be expected during construction. At Morningside park, no permanent impacts are expected to nearby TRCA properties as the bridge structure will be retained in place. Mitigations for temporary impacts include development of a construction staging and management plan and application of erosion and sediment control measures. A note was added in the EPR to acknowledge potential encroachment on TRCA owned lands, to be further investigated in the next phase of design.	1	To be addressed at future stages of design as per Section 5.2.3.2 of the report.	C	
5		Archaeology	TRCA's Archaeology team will need to conduct an archeological assessment prior to any works on TRCA owned lands that are required for any access, stockpiling/staging or construction work related to this project. Please provide the project footprint for this assessment.	Comment noted.	3	To be addressed at future stages of design as per Section 5.2.3.2 of the report.	C	
6		Planning	Provide the TRCA regulation and floodplain limit(s) on all applicable drawings.	Figure 4-21 and 4-22 show the TRCA regulation limit in relation to the study area. The TRCA regulation limits is shown in relation to the project footprint in the Natural Heritage Report throughout the study corridor (please refer to the plans in the NH report appendix). Adding linework on the design roll plots is impractical as it causes the file size to be prohibitively large for perusing of the roll plan.	3	Acknowledged. Include TRCA regulation and Floodplain limits on all applicable drawings on future detail design submissions.		This has been added as a future commitment.
7		Planning	Based on our request dated November 3, 2023, the proponent (City of Toronto) should submit the survey (on base topographic mapping) to TRCA, including the following information: a) Staked dripline of the contiguous vegetation associated with the valley; b) Staked top of bank; c) Date of staking; d) Names of TRCA staff who participated in staking; e) OLS stamp.	The project proponent will submit a survey as requested at a future date.	1	Unaddressed. Regulated features and hazards should be delineated at the earliest possible stages of planning to ensure mitigation of impacts to features and hazards are incorporated into future design stages. As per the meeting held on June 7, 2024, TRCA requests the survey to be provided as soon as it is reasonably possible given property access constraints.	C	Agreed. The City intends to undertake a survey at the soonest possible opportunity subject to a permission to enter agreement with the property owner. This will be documented as a future commitment in the EPR. Transit Expansion will contact TRCA as updates become available.
8		Planning	Provide the most recent design for the MSF site as shown in Slide 34 of the TAC#4 Meeting Slides presented on February 22, 2024.	Comment noted. MSF design has been updated and included in the EPR.	1	Addressed as per Section 3.2.9 of the report.	C	
9		Planning	As a result of the new regulation, please update the report with the following: TRCA permits will be required at the detailed design stage under Section 28.1 of the Conservation Authorities Act (Please see Section 4.4.5 as an example where 168/06 will need to be updated).	Comment noted. Included in Future Commitments as well as Provincial Permits and Approvals.	1	Addressed as per Section(s) 4.4.5, 7.2, and 8 of the report.	C	
10		Planning	Confirm no construction or work is to take place within the delineated daylight triangles.	Since the submission of 10% design and EPR, the sightline triangle assumptions have been revised to limit property requirements and impacts. Where possible, no construction work is to take place in the daylight triangles.	3	Acknowledged.	C	
11		Water Resources Engineering	In Appendix C of the EPR, the report titled, Eglington East Transit Project Assessment Process (TPAP), 10% Detailed Design, Drainage and Stormwater Management Report, dated February 27, 2024, notes that the TRCA SWM Criteria applies only to the addition of impervious areas. Note that the TRCA SWM Criteria for the road right of ways applies to both the addition of impervious areas and the existing impervious area that encompasses the proposed works. Any road right of way that includes new or upgraded storm sewers and infrastructure, should take the existing and proposed impervious area (entire widened road width and length) of the road for SWM treatment based TRCA SWM Criteria for road right of ways as previously provided since the onset of the EPR. Revise report text and design as required to ensure this.	The stormwater management plan will be developed to provide stormwater quality treatment for the additional impervious area. Stormwater quality treatment for the existing impervious area to the extent feasible given the spatial constraints within the corridor, and in accordance with the 2022 Draft MECP Stormwater Management Guidelines. <b>Post-Meeting Update:</b> SWM assessment will be updated as part of 30% design to refine SWM plan and confirm extent of SWM achievable for existing and proposed additional paved surfaces. The objective is to treat total area of pavement equal to the sum of existing and proposed additional pavement to the Maximum Extent Possible (MEP) per the 2022 MECP Draft Guidelines and CLI-ECA requirements. Treatment of runoff generated from pavement external to the ROW which is conveyed to and through the ROW is acceptable in lieu of treating pavement within the ROW.	3	Satisfactory response at this stage. To be addressed further at detail design.	C	
12		Water Resources Engineering	Note that in addition to the materials reviewed in this project, detailed comments on the Maintenance and Storage Facility (MSF) were provided on September 15, 2023 (TRCA comments). However, the overarching SWM comments on the MSF provided as part of this EPR in the earlier design stages still apply to the separate MSF submission.	TRCA comments will be addressed as documented in the September 14, 2023 Response Matrix	1	Acknowledged. TRCA staff understand the September 14, 2023, response matrix regarding the MSF site will be included in the draft EPR appendices as per email correspondence dated June 11, 2024, from HDR Incorporated.	C	
13		Geotechnical Engineering	For the crossings (example: Highland Creek Area), the risk of erosion hazard needs to be determined by slope stability assessment.	Included risk of erosion and slope stability assessment as impacts and mitigation in section 5.2.3 as well as in section 5.4.	1	Response noted. As per Sections 5.2.3 and 5.4, to be addressed further at detail design.	C	
14		Geotechnical Engineering	Appropriate geotechnical and stability study and design recommendations need to be developed and implemented in support of the proposed works including earthworks, grading, and site alterations.	This note has been included in table of Future Commitments.	1	Response noted. As per Section 8.1, to be addressed further at detail design.	C	
15		Geotechnical Engineering	All engineering drawings with appropriate level of details will need to be developed during the design in-progress.	Comment noted.	3	To be addressed further at detail design.	C	
16		Geotechnical Engineering	All previous TRCA geotechnical comments need to be addressed as the design progresses.	Comment noted.	3	To be addressed further at detail design.	C	
17		Planning Ecology	Section 5.4.1, Table 5.10 Reference TRCA's Erosion and Sediment Control (ESC) Guideline of Urban Construction. Microsoft Word - ESC Guide for Urban Construction.docx (sustainabletechnologies.ca)	Included as noted.	1	TRCA notes that the reference to the ESC Guidelines throughout the Natural Heritage Report (NHR) is outdated. Please update all references to reflect the updated 2019 document.		These have been updated throughout the EPR.
		Planning Ecology	Section 5.4.1 Consult TRCA Guideline for Determining Ecosystem Compensation (2023) regarding the potential wetland loss resulting from the works. Early engagement with TRCA regarding wetlands is recommended. Wetland staking with TRCA will be necessary to confirm feature limits. Ecosystem Compensation Protocol (trca.ca-central-1.amazonaws.com) If wetland creation is proposed, please provide details regarding the location, size, and design of the wetland. Please include details in the Environmental Project Report and Natural Environment Report.	Compensation requirements will be determined in consultation with the City and TRCA during detail design once the grading limits have been confirmed. Compensation will be based on the type, location and extent of vegetation removals and appropriate compensation ratios. Compensation will be provided in accordance with the Guideline for Determining Ecosystem Compensation (2023).	1	Deferred to detail design. Compensation requirements to be addressed through detail design. TRCA notes that a total of 0.57 ha of wetland is anticipated to be impacted by the works (as noted on Page 80 of the NHR). This estimate is preliminary and must be refined as design progresses. TRCA looks forward to providing further advice in relation to the creation of new wetland areas through the next phases of design. It is encouraged that locations for potential wetland restoration / compensation / creation be considered early in the design process and discussed with TRCA for suitability in meeting TRCA requirements.	C	

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19		Planning Ecology	Section 5.4.1 Reference TRCA Seed mix guideline to support the selection of appropriate seed mixes suitable to the various adjacent habitats. Seed-Mix-Guidelines-Update_January-19-2022.pdf (traca.s3.ca-central-1.amazonaws.com)	Has been included as noted.	1	Acknowledged. To be confirmed through detail design.	C
20		Planning Ecology	Look for opportunities to reduce the size of the Maintenance and Storage Facility (MSF) to minimize its impact on the watercourse. It is TRCA's preference for the watercourse to remain daylighted and in situ and no further enclosure. Please consider alternative design options for the MSF.	Comment noted. The design of the MSF is preliminary at this stage and is subject to refinement in future phases.	3	Response noted. Comment deferred to detail design. TRCA acknowledges the 10% Functional Design Layout for the EELRT MSF and the identified 65 m setback to accommodate an open watercourse. Through detail design, the required limits of the watercourse corridor should be established based on managing flood and erosion risks. TRCA staff support a design that maintains an open channel. Any watercourse alterations should be designed following natural channel design principles.	C
21		Planning Ecology	Highland Creek Morningside Provincially Significant Wetland (PSW) Complex is located along Morningside Road. The limit of the wetland adjacent to the proposed works should be confirmed with TRCA, if there are anticipated impacts to the PSW.	Comment noted. No impacts are anticipated to the Highland Creek Morningside PSW as the proposed EELRT widening is within the existing available City right-of-way.	3	Addressed. No impacts anticipated at Highland Creek Morningside PSW. The NHR notes that the culvert located downstream of this crossing on the south side of the MSF site is recommended to be removed and an open channel constructed. To be confirmed during detail design.	C
22		Planning Ecology	Given the potential SWM changes, a feature-based water balance risk evaluation should be undertaken to inform the feature-based water balance (FBWB) requirements for the project. The FBWB risk evaluation will assess if there are any potential risks to the hydrology of the adjacent PSW from the proposed grade and drainage changes. Please see TRCA's Wetland Water Balance Risk Assessment to assist with this process. WetlandWaterBalanceRiskEvaluation_Nov2017.pdf (trca.ca)	A feature-based water balance assessment will be completed as part of the detailed design, if required based upon the outcome of the risk assessment and discussions with TRCA. Please note that, based upon the nature of the work to support linear infrastructure, and the extent of new impervious surfaces proposed, it is anticipated that this would qualify as a low risk undertaking and not require a full assessment. Further, it is anticipated that any potential impacts would be mitigated through the stormwater management plan, incorporating LDs as part of a treatment train approach for stormwater quality control and water budget management. <b>Post-Meeting Update:</b> TRCA explained that they would like the Wetland Water Balance Risk Tool used in 30% design. TRCA expects that it will be low risk and SWM mitigation measures will be sufficient. TRCA confirmed that a monthly water balance assessment using Thornthwaite spreadsheet is required in 30% detailed design to support risk assessment. Requirements for wetland water balance monitoring during and post-construction are to be determined based upon results of risk assessment and details established during permitting process. A note has been added in the future commitments section of the EPR.	3	Response noted. Comment carried forward to future stages of design. TRCA staff note that feature-based water balance has not been identified as a method of mitigating impacts to wetlands. TRCA requires a risk assessment be completed, as required, to confirm the assumptions noted in the response.	C
23		Planning Ecology	There appears to be consideration for infrastructure upgrades including Highland Creek Bridge near Washburn Way (Structure ID: 211), Highland Creek Bridge near McCowan Road (Structure ID: 265), and Sheppard Avenue - Tributary of Morningside Creek Culvert near Conlins Road. All potential works related to the EELRT should be considered at this stage including assessment of potential impacts to watercourses and wetlands in the relevant reports. The assessment should inform the preferred alternatives. Please provide details for the infrastructure upgrades including span sizes, impact on fluvial geomorphic processes, connections to natural corridors, and the incorporation of eco-passages. A thorough technical rationale is necessary for determining the dimensions of all new, replaced, or extended culverts/bridges. This rationale should consider factors such as fluvial geomorphology, the effect on vegetation, wildlife movement, the inclusion of eco-passages, and the connectivity of corridors, as appropriate.	Comment noted. At this stage of design, no fluvial geomorphic assessment has been conducted and bridge dimensions are conceptual in nature pending future refinement. The EPR has been updated to acknowledge the potential impacts to TRCA properties due to anticipated construction for the modification of the existing bridges and proposes at a high-level mitigations and commitments for next steps.	1	Response noted. Comment carried forward to future stages of design. Widening / replacement works anticipated at Sheppard Avenue near McCowan Road (ID: 265) and Washburn Way / Lapsley Road (ID: 211). Detailed assessment of potential impacts to watercourses and wetlands will be required. Fluvial geomorphic assessments will be required. Channel works should follow natural channel design principles to the greatest extent feasible. Efforts to re-establish watercourse connectivity with the floodplain in areas that are channelized / closed bottom are strongly encouraged, where practical. Increased bridge structure sizes should be considered. TRCA staff will continue to provide advice through the next phases of design. At minimum, commitments in section 5.2.2 of the NHR should be followed in addition to TRCA comments. TRCA staff support mitigation measures identified in Section 5.2.3.2 of the EPR.	C
24		Planning Ecology	Please identify the impact areas (ha) to the Ecological Land Classification (ELC) habitat present associated with the preferred alternatives and proposed infrastructure to determine the extent of impacts and assist in informing the restoration efforts.	Comment noted. Included breakdown of ELC impacts.	1	TRCA notes that estimates are preliminary and should be refined through detail design specifically with respect to impacts on TRCA regulated features / areas.	C
25		Planning Ecology	During the detailed design phase, plans should outline the extent of grading, label access routes and staging areas, and clearly display all disturbance areas, erosion and sediment controls (ESCs), and outline construction sequencing and phasing.	Comment noted. Included verbiage on outlining grading, access routes and staging/disturbance areas in detailed design.	1	To be confirmed through detail design.	C
26		Planning Ecology	Provide a robust planting(s) plan to restore disturbance areas associated with the works.	Comment noted. Planting plans are outlined as mitigation measures in the EPR.	3	To be confirmed through detail design, specifically related to stabilizing soils within TRCA regulated areas.	C

**TABLE 7. IMPACTS TO VEGETATION COMMUNITIES WITHIN THE STUDY AREA**

Vegetation Community Type	Vegetation Community	Total Area (ha) to be Impacted
Cultural	Dry-Moist Old Field Meadow (CUM1-1)	9.56
	Scotch Pine Coniferous Plantation (CUP3-3)	0.06
	Mineral Cultural Woodland (CUW1)	0.14
	<b>Sub-total</b>	<b>9.76</b>
Wetland	Shallow Marsh (MAS2)	0.57
	<b>Sub-total</b>	<b>0.57</b>
Human Influenced Lands	Restoration Area	0.13
	<b>Sub-total</b>	<b>0.13</b>
<b>Total</b>		<b>10.46</b>