

APPENDIX A – Draft Terms of Reference Review Comment Disposition Tables

Public Comment Disposition Table

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Table A-1: Public Comment Disposition Table

Theme	ToR Section Reference	Comment	Response
Objectives	2.4 Project Vision & Objectives	Please change the priority, it is not clear how the first priority was determined to be public access. The lake shore is accessible in many areas and the creation of an AODA accessible trail in this area will severely impact the natural resources, there is little to no area for access and construction. This area should be viewed as a ANSI and significant wildlife habitat. Any trails or access should be minimized to preserve the ecological function of the shoreline. Any erosion protection of existing properties should first assess the purchase of those properties by the City and any shoreline protection or public access should be assessed at the top of the bluffs on properties acquired as hazard lands. Every day we lose more and more of our green spaces to trails, roads, development, there is so little protection left as TRCA and other agencies are dismantled. Please provide a value for the natural resource and value that over AODA accessible switchbacks removing what is left as a natural resource.	All of the objectives listed in Section 2.4 are of equal importance. This has been further clarified directly in the ToR. Over five decades of waterfront policy and planning studies, many of which have been endorsed by City Council, include a consistent direction around equity and access to and along the waterfront, desire for a continuous waterfront trail across the city, recreational opportunities, and protection and enhancement of the natural environment. This has been further highlighted by the most recent 2022 Waterfront Revitalization report. Terrestrial and aquatic impacts and opportunities to enhance and create habitat will be assessed as part of the evaluation of Alternatives in the Environmental Assessment (EA) phase.
	Objective 1: Conserve, create & Enhance Terrestrial & Aquatic Natural Features & Linkages	Don't agree with the proposed revitalization plan from the East Beach to Scarborough Bluffs. The beach at the east end of the boardwalk is a peaceful natural area and would be ruined and changed by bike trails. I also use many of the Bluffs trails and feel they should be left in their natural state as that is the beauty. Also more trees would be destroyed. We have a special area on the waterfront and you can never get it back if you pave any of it.	The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. Currently, people are accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment and causes public safety issues. The EA will explore opportunities to formalize access and use, such that negative impacts can be minimized and benefits can be realized. The Alternatives will include both shoreline and tableland connections. The Alternatives that are developed as part of the EA will be designed and evaluated on their ability to address community needs with respect to providing access to and/or along the shoreline and an enhanced experience, along with addressing slope stability and erosion risk, while also enhancing aquatic and terrestrial habitats, where possible.
	Objective 2: Manage Public Safety & Public Infrastructure	I hiked for many years from the Filtration Plant to the concrete causeway past Warden Ave. Landslides were frequent and every 2-3 years covered the entire walkable beach. It is a miracle no one ever died (that I know of). Stabilizing the bluff/cliff would require either stabilizing all of it, at huge expense, or stabilizing it as required (after a landslide), an ongoing patchwork again at huge expense. Is it worth it?	TRCA has an Erosion Risk Management Program (ERMP), which involves annual assessments of the condition and deficiencies of erosion control structures along the Lake Ontario waterfront and along ravines within TRCA's jurisdiction. The shoreline structures are in fair condition and are maintained through a major maintenance program on a priority basis and based on the level of funding available. Despite the shore protection in place, landslides will continue. As part of the EA, the shoreline Alternatives that are developed will aim to build out the trail to decrease risk of landslide to users and address other slope stability issues where public infrastructure or public safety is at risk. Tableland connections will also be developed for evaluation, outside the erosion hazard area. All Alternatives, along with the evaluation of environmental impacts, will be made available for public review and feedback.
	2.4 Project Vision and Objectives	I refer to page 16, Topic 'Access', the concern advocating an 'adventurous and unique experience.' I have previously expressed this preference. The response refers to a policy of making the waterfront accessible to all. My point is that there are many kilometres of waterfront, much of which is already accessible to all. Does the policy assume that every metre of the waterfront must be accessible to all? If so, why? I'm guessing that Parks Canada has accessibility policies as well, yet it would be absurd to suppose that every trail in Banff National Park must be accessible to all.	The City does not restrict access to parks or similar infrastructure (e.g., trails). Formal access to and along the shoreline in this area is limited and inaccessible for many users, including police and other Emergency Service providers. There is a long history of planning and public engagement with respect to the City of Toronto waterfront, including the most recent 2022 report on the Next Phase of Waterfront Revitalization . The results of these processes have indicated that the waterfront should be accessible to all. The EA phase will explore Alternative concepts of how this can be realized, including shoreline and tableland connections.
	2.4 Project Vision and Objectives	The list of Objectives (section 2.4 and details laid out in Table 2) should be prioritized, and this prioritization used in the assessment and development of 'Alternatives To.' For instance, conservation and public safety are of great importance and have time-sensitivity, while enhancing the waterfront experience and efforts to 'improve the public realm with more parks, public squares and natural settings that please the eye and lift the spirit and support a sense of belonging to the community' (page 10) are not necessary, though nice to have. Given the city budget, funding should not be allocated to 'nice to have' items at this time.	All the objectives listed in Section 2.4 are of equal importance. This has been further clarified directly in the ToR. Over five decades of waterfront policy and planning studies, many of which have been endorsed by City Council, include a consistent direction around equity and access to and along the waterfront, desire for a continuous waterfront trail across the city, recreational opportunities, and protection and enhancement of the natural environment. This has been further highlighted by the most recent 2022 Waterfront Revitalization report. The project objectives will be explored in different ways by the Alternatives and the Preferred Alternative will need to balance achievement of these objectives.
	2.4 Project Vision and Objectives	It is difficult to understand the project when the objectives are sometimes opposing to each other. If the objective is to enhance terrestrial and aquatic natural features how will a wide trail that follows the shoreline enhance or create this? Currently the area is a more natural environment and any construction of trails or extensive shoreline work will remove and reduce the natural features (both terrestrial and aquatic). The ToR don't provide an explanation of how this can be achieved since the only alternative is to "do something" and this is applied throughout the entire study area, but what is it that will be done? It is also hard	The objectives outlined in Section 2.4 of the ToR describe what the project is trying to achieve if implemented. The objectives are not mutually exclusive and can be achieved in tandem, as noted by the approved Scarborough Waterfront Project. Section 4 of the ToR describes what will constitute the Alternative Methods, or what it means to "Do Something", and how those Alternatives will be developed.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
		to see how the objective of enhancing the waterfront experience requires the need for a large (twinned) trail that will remove much of the existing natural vegetation.	
	2.4 Project Vision and Objectives	General objectives do not apply throughout the study area, that is why a level of alternatives (e.g., constraints and opportunities in a segment) must be presented. As an example, slope stability issues are not relevant to stable slopes; and beach erosion issues shouldn't apply to the previously hardened shoreline. The public have no idea what the scope of the EA is, thereby precluding meaningful comments on the ToR.	Section 2 of the ToR provides a detailed description of the problems and opportunities across the Study Area. For the SBW Project, all objectives are applicable to all segments. We are currently early in the planning process and have not yet developed any Alternatives. Planview concepts and renderings of proposed Alternatives will be available to the public during the EA phase.
	2.4 Project Vision and Objectives	Page 16 states “within the Project Study Area, an extensive network of informal trails has been identified that provide informal access to and along the waterfront”. When walking this area recently this is not apparent. There appears to be a few informal trails in the four informal access points from table land to the beach identified in the ToR, but once on the beach, the topographical conditions ensure that people stay on the beach. Informal trails appear to be very limited, and not an extensive network. Evidence should be provided of the existence of this extensive network of informal trails.	The presence of informal trails has been confirmed through field studies, on-going monitoring works and anecdotal evidence from area residents and users. The trails you note, which are linear and follow beaches and dock walls, are informal, as are many of the access points. Those who access these areas often scale revetments and shoreline protection structures which are not accessible by Emergency Services. Sections 5.3.2.5 and 5.3.3.1 of the ToR document informal trails. We have removed the term “extensive” from the ToR.
Access Issues	2.5.3.1 Access to & Along the Waterfront Key Problems	On the issue of public safety, the report should mention boating accidents and drownings on this stretch of the coast. Are there numbers on how many people drowned while swimming in the inaccessible shore areas? A few years ago, there was also a fatal boat crash at Woodbine Beach. Providing these numbers could bolster the argument that a new path will improve public safety.	Comment noted. The team will consult with Emergency Services during the EA to see if this information is available.
	2.5.3.2 Project Opportunities	This section references 4 sites to investigate formalizing access to the waterfront (RC Harris, Fallingbrook, East of Fishleigh and Bottom of Warden). I personally live on the bluff (bottom of harding) and can confirm that countless people also access through and around Harding Parkette. Can that please be added to the list of sites to investigate formalizing access? If requested, I can document with photos and/or video the consistent groups of people going down there via this Parkette. It also seems to be not privately owned.	The EA will examine various Alternatives to provide formal access to the shoreline, including Harding Parkette and others, in addition to those noted in Section 2.5.3.2.
	2.5.3.2 Access to & Along the Waterfront	Overall the Vision and Objectives seem very reasonable and balanced, as well as the preferred alternatives. Section 2.5.3.2 Page 22 - Suggest 1 additional opportunity. A continuous trail will physically connect the communities of the Beaches and Scarborough Southwest providing both social and economic benefits to both. Supports the 1st priority of the 'Next Phase of WF Revitalization' which is 'Strategic Economic Development'.	Your suggested edits have been made within the document.
	2.5.3 Access to & Along the Waterfront	Please ensure the trail is accessible to all users. Make it complete from the Beach boardwalk to Bluffers Park. Ignore the inevitable NIMBYs and dog owners trying to compromise the greater public interest.	The project will explore the feasibility of a shared, multi-use trail that meets the City of Toronto's Multi-use Trail Guidelines (2015) and, where feasible, trails will be made accessible to all users. A number of trail alignments will be explored based on site constraints and impacts, including continuous shoreline trails, top of bluff (tableland) alignments, and a combination of both.
	2.5.1 Habitat Integrity	Page 10 states that “connective shoreline management works that could be a part of the SBW Project provide opportunities for aquatic habitat enhancement and/or creation, particularly in areas where less advanced techniques were previously applied.” Does this mean that consideration won't be given for the existing environment? For example, the existing groynes provide fish habitat and there is the presence of SAR in the area so why would we remove these features to create fish habitat?	Section 2.5.1.2 details the opportunities to improve habitat. Where shore protection works are enhanced, altered, or enlarged in order to provide access or bring existing works up to current design standards, there is an opportunity to enhance aquatic habitat. Existing habitat will be considered and where there are changes contemplated, it will be done in a manner which enhances habitat.
	2.5 Problem/ Opportunity Assessment	There is no link between the problems and opportunities and the study area, specifically the segments. The problems and opportunities are very general and are not specific to any of the various segments present in the study area.	The problems and opportunities exist to some extent in all segments of the Study Area.
	5.3.2.5 Regional & Local Trails	Some more information on the Kingston Road changes would be useful. It may be worth noting, somewhere, that in the study area, the bike path between Fallingbrook and Bluffer's Park has many twists and turns on residential streets, and it is very easy to become lost (see page 70).	The City of Toronto is currently undertaking a study to implement complete street features on Danforth Avenue (Victoria Park Avenue to Kingston Road) and Kingston Road (Danforth Avenue to Scarborough Golf Club Road). This includes changing the layout of the existing road space to accommodate vehicular traffic, transit, parking, bikeways, and other safety improvement features. Much of this study is out of the Study Area for SBW, or is adjacent to it. As this study is currently ongoing, changes to Kingston Road have not been determined at this time. As the study progresses, any relevant information or proposed changes will be coordinated with the SBW Project. The waterfront trail throughout the Study Area is mapped in Figure 5-16, showing the existing route and users have noted difficulties in navigating it.
Existing Environmental Conditions			

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
	5 Description of the Environment	is Queen Street East's elevation really 90 metres?	Yes, it is. These measurements are from sea level. For reference, Lake Ontario is approximately 70m above sea level (depending on the water level).
	5.1.11 Littoral Sediment Transport	mention of "A planned expansion of the Bluffer's Park headland." What is this referring to?	As part of the approved Scarborough Waterfront Project EA for the waterfront east of Bluffer's Park, the headland will be expanded.
	5.2.3 Wildlife Species of Concern	mentions the red fox. Recall that in 2020, a family of red foxes established themselves just west of the study area (by the boardwalk), leading to large crowds and the requirement for volunteers to guard the fox den. (Even the New York Times reported on it.)	Comment noted.
	5.3 Socio-Economic Environment	the text should must mention the extreme economic dividing lines of Kingston Road (south/north), and then Fallingbrook (west/east). I am certain that the demographic data would be significantly different. Federal census data, at the tract level, should show this.	Edits have been made to Section 5.3 to reflect the diversity of socio-economic realities within the Study Area.
	5.3.1.1 Planned Land Use	is there a Business Improvement Area along Kingston Road, in the study area?	There is no Business Improvement Area (BIA) along Kingston Road.
	5.3.1.3 Future Land Use	Why is housing mentioned here? It is a major issue, but isn't it beyond the scope of this study? And if housing is mentioned, transit access should be as well.	Housing is mentioned in this part of the ToR to signify the on-going and anticipated growth in this part of the city. The type of housing has an impact on the demand for recreational facilities, particularly open spaces, trails, and amenities. Transit access to the Study Area is mentioned in Section 5.3.5 of the ToR.
	5.3.2.3 Community Facilities and Services	St Augustine's Seminary should be included among the list of educational institutions here	Comment noted. Edit has been made to the ToR.
	5.3.2.4 Parks and Recreation	the lawns at the Filtration Plant are de facto a public park and should be included. There are many problems with off-leash dogs here. And it might be worth mentioning in this section the lack of public restroom facilities between Balmy Beach and Bluffer's Park.	Comment noted. The recreational use of lawns at the Filtration Plant are noted but are not mentioned in the ToR as it is not a formal park space within the Study Area. Any requirements for new sanitary facilities will be addressed for the Preferred Alternative in the later stages of the EA.
	5.2.3.6 Online Exercise Tracking Apps	OpenStreetMaps can also list informal trails; it is also open-source, so anyone can use it. A quick glance shows that it indicates several unmarked trails at Bluffer's Park.	Comment noted. We have included reference to OpenStreetMaps in Section 5.2.3.6.
	5.3.3.1 Shoreline Access	it is worth noting that the board walk ends at Silver Birch, and the "path" is actually upon the sand. Bikes, strollers, wheelchairs, etc., cannot use it, and it is through an off-leash dog area (so pedestrians can be swarmed by dogs.)	Comment noted. Clarification was added to section 5.3.3.1 that the boardwalk terminates at Silver Birch Avenue.
	5.1.13 Existing Shoreline Protection	Will this project remove/change the existing shoreline?	The shoreline is already 94% altered with human-made structures, such as armourstone revetments, cobblestone beaches, groynes, and sheet piles walls. As the existing shoreline is predominantly made up of engineered landforms resulting from previous erosion works, they can be altered. Potential changes to the existing shoreline will be assessed once Alternative Methods have been developed during the EA stage. No Alternative Methods have been developed yet.
	5.3.6 Traditional Uses and Interests	some of this historical information should go much earlier in the report.	Comment noted. This change has not been made as it is inconsistent with the direction from MECP in the "Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario".
	5.3.7 Cultural Heritage/Arch	It might be worth noting that the Filtration Plant is frequently used in films.	Comment noted. An addition has been made to Section 5.3.7 to mention this usage.
	5.1.7.1 Design Water Level	Design Water Level: This should take into account changing rainfall patterns (climate change is mentioned in 5.1.12.) The federal government's Canada's Changing Climate report gets into this: See Chapter 8, pages 439-440, where there are projections for the Great Lakes.	The design of the Alternatives will take into consideration changing water levels, rainfall patterns, and the frequency of extreme weather as projected to occur as a result of climate change.
	5.3.2.4 Parks	Several comments were received about the importance of the Silverbirch Leash free dog park that runs between Silverbirch and Nursewood. Questions were asked about how it would be affected by the project.	<p>TRCA and the City understand the importance of the Silverbirch Dog Off-Leash Area (OLA) to local residents.</p> <p>On April 23 and 24, 2025, City Council adopted Item IE20.9 - Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas, replacing the People, Dogs and Parks - Off-leash Policy, adopted by City Council at its meeting on January 26 and 27, 2010.</p> <p>The Strategy will serve as both a framework and decision-making tool to guide the lifecycle of OLAs development as well as promote responsible dog ownership through community engagement, positive</p>

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
			<p>education, and bylaw enforcement. The Strategy includes a number of goals, including Goal 5 : Improve – Sustain and Increase Value, which speaks to improving existing OLAs through ongoing state-of-good-repair (SOGR) investments, including prioritizing critical repairs, accessibility upgrades, environmental impacts, and fencing needs. The Project team will coordinate with the City’s Parks and Recreation team leading the OLA Strategy for updates on the OLA SOGR program as the Project advances.</p> <p>During the EA phase of the project, Alternatives will be generated for trail connections from Silver Birch to Warden Ave, and those Alternatives will be assessed for their impacts based on the preliminary criteria and indicators listed in Table 4-1 of the ToR. Any impact to the dog OLA will be considered against the other negative and positive impacts of each Alternative. Consultation on the Alternatives and the assessment of impacts will occur during the EA.</p>
	5.3.2.5 Trails	We totally support the extension of the recreation trail along the Scarborough Bluffs. It will make for amazing biking and walking! Thanks for this initiative and please make it happen asap!	Comment noted. Thank you for your support of this project.
	5.3.2.3 Community Facilities & Services	Consider including the Silverbirch Boathouse, a city run paddle-boat storage facility on the boardwalk just west of Silverbirch Ave. Many locals launch from here and paddle east, stopping off at the various beaches within the study area.	Your suggested edits have been made within the document.
	5.3.2.5 Regional & Local Trails	The connection with the Waterfront Trail (Martin Goodman Trail) just west of Silverbirch needs consideration. Even though this may be outside the geographical study area, if there is a new, continuous trail heading east, the trail from Balsam Ave to Silverbirch will be impacted by a greater volume of trail users. It's already a congested, complex path today	Comment noted. The SBW project will explore the feasibility of creating a connection between the existing Martin Goodman Trail and any new trail infrastructure to the east.
	5.3.3.1 Planned Land Use	Please consider changing the term 'residents' to 'public use' with reference to the people who may be leaving behind garbage and glass. Locals have traditionally been the unofficial stewards of the beach. In the same section, note that members of the public frequently trespass through private property looking for the beach access today.	Your suggested edits have been made within the document.
	5.3.2.4 Bluffers Park 5.3.4 Parking	Off-leash pets are a known problem already in the Beaches neighbourhood. I've witnessed child following a dog attack(blood was drawn) but parents don't bother calling 311 any longer as they don't feel Bylaw officers will show up. Will there be an increase in bylaw officers in the area, especially around waterfowl habitats? Will there be a Bylaw officer station in the new park area? p73 - lists a number of streets between the Harris water treatment plant and Silver Birch Ave but neglects to site that the street parking in this area is mostly to accommodate existing street permit holders. The opportunity for day users is severely limited within existing street parking. What new parking development(s) is the city planning for this area? Will the city be appropriating land in order to accommodate increased parking needs?	<p>During the EA phase of the project, Alternatives will be generated and assessed for their impacts based on the preliminary criteria and indicators listed in Table 4-1 of the ToR. The number and location of by-law officers is a City operational issue and, thus, is not part of this EA.</p> <p>We have revised Section 5.3.4. of the ToR to indicate that the street parking in the Eastern Beaches is shared with permit holders.</p>
	5.2.4 Fish & Fish Habitat	The ToR state that the existing shoreline did not offer any aquatic enhancement has not been demonstrated in the ToR. Have studies been completed that demonstrate the existing groynes have not offered aquatic habitat? We understand it has been the experience with other Lake Ontario shoreline works that the groynes offer habitat to some aquatic species and that removal of these groynes would potentially impact this habitat. If aquatic habitat is found will that remove the opportunity to consider any infill or in-water works? Is the intent of the onshore work also to enhance aquatic habitat?	Section 5 of the ToR outlines existing conditions. The ToR states that changes to the shoreline provide an opportunity to include intentional aquatic habitat improvements which were not contemplated for many of the older shoreline protection structures in the Study Area. The impact of changes to the shoreline protection on aquatic habitat will be assessed as part of the evaluation of Alternatives. The intent of all in-water works will be to make the aquatic habitat better.
	5 Description of the Environment	A very broad brush seems to have been applied to the study area in summarizing the existing conditions and how this information will be used to develop alternatives is difficult to follow. There is a large variety of natural features present in the study area from the beaches, grassed areas around the RC Harris Plant and Bluffers Park, to the Needles and the bluffs. It is unclear how this will affect the consideration and identification of alternatives since the ToR and the discussions to date don't indicate what will be considered and where. The public should be informed of the constraints and opportunities that potentially directly impact them. A constraints and opportunities map would assist the study team in communicating essential information that is required for the public and residents to more fully understand what will be proposed and to then provide meaningful comments.	The existing condition is what constitutes the full definition of the environment today and the assessment of impacts will consider how each Alternative may or may not change these existing conditions. There are no areas of the Study Area for which the existing conditions preclude the development of Alternatives.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
	5.1 Physical Environment	It is stated that 94% of the shoreline has some form of protection and the only natural shore is in the area of the Needles. It is not clear why this statement is included. The existing condition is typically what the EA should protect and enhance. As documented in the ToR, the majority of the waterfront in the study area is characterized as beach. Furthermore, there has been a dynamic beach in the area for 100 years based on the archival photos previously provided to the study team. Will the beach length, area, continuous acres to water's edge be maintained and enhanced?	The existing condition is what constitutes the full definition of the environment today and the assessment of impacts will consider how each Alternative may or may not change these existing conditions. The ToR does not state the majority of the waterfront in the Study Area is characterized as beach. Section 5.1.13 of the ToR has been updated to provide more clarity on the existing shoreline. Apart from the western-most edge of Bluffer's Park, the sand and/or cobble headland-beaches that exist within the Project Study Area are engineered together with the groynes (beach and groyne system) to form works that protect the shoreline and Bluffs. As a result, these are not classified as dynamic beaches.
	5.3.5 Transit	I think it was a mistake for the study not to include transit access. But within the scope of the study, I think that the ToR should mention any plans of the City of Toronto and TTC for the study region. (For example, the ToR don't mention the issue of subway construction in Scarborough.) The GO train also runs very close to the study area, and perhaps Metrolinx have plans for the area too. Note that on page 66, in the section on Bluffer's park, the traffic problems are mentioned, and page 30 mentions transit stops. It also worth noting that although the 510 streetcar terminates in front of the Filtration Plant, that point of the line is difficult to access from Scarboro: it can only be accessed from the 64 Main bus, at Main Street and Kingston Road, or at Main Street subway station. Maybe this could be integrated into section 5.3.5.	Section 5.3.5 of the ToR describes existing transit services within the Study Area. There are no current plans from the TTC or Metrolinx that impact the Study Area. If this changes the information will be considered in the EA. Decisions around transit routes and frequencies are determined by the TTC and are not within the scope of the EA. As noted in Table 4-,1 the Alternatives will be assessed with respect to the proximity of access points to transit stops and the ability of each alternative to provide a continuous active transportation corridor.
Alternatives To the Undertaking	3 Alternatives to the Undertaking	Though I personally support "do something," the list for this option should probably include some mention of having to deal with private property owners and facing construction costs	Revisions have been made to Section 4 to further provide context and potential environmental effects of the proposed Alternatives, including effects to private property.
	3 Alternatives to the Undertaking	This plan dramatically changes the character of the Beaches and has not been a transparent undertaking. It looks to be pushed through to satisfy biking km buildout at massive cost at a time where the cities priorities should be focused on improving the basic services (TTC, roads etc) that have increasingly deteriorated (either in safety or in coordination of work).	No Alternatives have been developed at this time; they will be developed during the EA phase and the public will have the opportunity to comment. One of the purposes of the EA process is to receive feedback from the public. The ToR is the first phase of that process. An additional three (3) public open houses will be held as part of the EA process. Currently, only the ToR and EA phases are funded. Funding for detailed design and construction has not is subject to future consideration and approval by City Council.
	3 Alternatives to the Undertaking	Several comments were received expressing support of the 'Do Nothing' Alternative. Some samples are: <ul style="list-style-type: none">There is nothing wrong with the current situation and there is really no need to extend trails any further. The existing trail is wonderful, stretching across Toronto and we have exciting new trails coming at the foot of the Don. Please leave the bluffs for the wildlife and do what you need to do to limit erosionIt seems to me that we should leave this area as untouched as possible. If there is a necessity for EMS access it would seem we need to provide it. More parking at Tommy Thompson Park would provide thousands of acres of waterfront recreation at very little cost.I am most definitely opposed to the terms of reference for the Bluffs West revitalization, in that it will increase the traffic into the neighbourhood significantly, and with the blossoming number of new condos, there is just not enough infrastructure to handle the traffic. Furthermore, having the infrastructure built and then having people walk, etc along the bottom of the Bluffs, which at this point is under significant erosion concern, will only damage the natural beauty that exists there nowPlease leave alone this natural habitat and refuge for wildlife, for their sake and for humans: the cliffs/bluffs are extremely unstable, different sections collapse all the time creating huge mudslides that extend onto shoreline/groynes and into the lake. Those cannot be secured for a public walkway underneath them without ridiculous expense and without destroying the natural environment. The area is already accessible, and people visit enough as it is.	As discussed in Section 2 of the ToR, there are a number of policies that support the provision of equitable waterfront access for all. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. Currently, people are accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment and causes public safety issues. The EA will explore opportunities to formalize access and use, such that negative impacts can be minimized and benefits can be realized. The Alternatives will include both shoreline and tableland connections. The Alternatives that are developed as part of the EA will be designed and evaluated on their ability to address community needs with respect to providing access to and/or along the shoreline and an enhanced experience, along with addressing slope stability and erosion risk, while also enhancing aquatic and terrestrial habitats, where possible
	3 Alternatives to the Undertaking	Several comments were received expressing support for the 'Do Something' Alternative. Some samples are:	Comment noted. Thank you for your support on this project.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
		<ul style="list-style-type: none">• I love the idea of a public path along the waterfront, similar to what was developed in the Rouge Valley area. Everyone should have access & accessibility to the waterfront for walking, biking, running, etc. It's a gorgeous part of our city.• I think adding additional access to the beautiful shore (to mitigate what's currently happening - lots of cutting through private property or going through natural wooded areas) will be great; including accessibility features for people of all abilities is important, too.• I am extremely in favour of this! Being able to cycle along here especially would be incredible, especially considering where I live, and how much I cycle already.• think overall this is an important project, connecting trails, bike paths, and hopefully Scarborough neighbourhoods to the waterfront.	
	3 Alternatives to the Undertaking	<p>I am very concerned about the proposal to change the Scarborough bluffs area to increase public access. This stretch of waterfront is currently not easily accessed due to the very steep bluffs, and the unstable ground.</p> <p>If the proposed pathways are built, that stretch of beach will still be a long way from other people, and with the noise of the water, calls for help would not likely be heard. When someone is at beach level, they are extremely isolated and far away from any assistance if it is needed. It will be a dangerous place for walkers, particularly young women. Unless there are plans to provide 24 hour police protection, I don't think the city should be encouraging people to enter this area.</p> <p>The entire 4.5 kilometres of proposed walkways would be beside sandy beaches. If this area is opened to the public, each summer there will be many people swimming along the entire stretch. There have been a number of drownings in Lake Ontario near Bluffers Park, and I expect this number would grow dramatically. Does the City intend to staff full time life guards over this 4.5 kilometre stretch of water?</p> <p>Once this area is opened to the public, it will become a destination for groups of young people and family picnics, with barbecuing, tents and loud music. There will be a need for policing the crowds.</p> <p>There are a number of people who currently congregate on the eastern beaches at night, having bonfires, setting off fireworks and such, but this area is easily observed from roads, and is well policed. This will not be the case with a walkway along the base of the cliffs.</p> <p>Bonfires will be set, and with onshore breezes, or careless moves by those drinking by the fires, these could end up spreading up the bluffs, resulting in the loss of stabilizing roots and increased or possibly catastrophic dune collapse. Fireworks could also set off fires.</p> <p>Even if the city closes the new access stairway/sidewalks at night, people can always find away around or over barriers. Once the paths are in place, more and more people will become aware of the isolation of the place, and I believe it could become a draw for certain activities, such as the raves that currently occur at some Toronto sites.</p> <p>Unlike those other sites, this one will be more dangerous, as access will necessarily involve a steep climb, possibly on wet ground. And if someone needs medical help, or assistance from an attack, it could be a long time coming.</p> <p>Apart from the safety issue, I think encouraging people to walk along the base of these bluffs will lead to increased damage to the bluffs. Regardless of signage, some people will attempt to climb the sand walls, pulling on bushes to aid their climb, and thus helping to further erode the banks. In addition, the nests of shorebirds will be disturbed.</p>	<p>The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. Currently, people are accessing the shoreline via informal paths, often trespassing on private property to do so as housing has been built along the top of the bluffs in many locations. Current use is not managed by By-law Officers as there is no access to the shoreline in many areas and some areas are privately owned and cannot be accessed, including by police and other Emergency Services.</p> <p>This unmanaged use impacts the natural environment and causes public safety issues. The EA will explore opportunities to formalize access and use such that negative impacts can be minimized and benefits can be realized. There is a long history of planning and public engagement with respect to the City of Toronto waterfront, including the most recent 2022 report on the Next Phase of Waterfront Revitalization. The results of these processes have provided a consistent direction around equity and access to and along the waterfront, desire for a continuous waterfront trail across the city, recreational opportunities, and protection and enhancement of the natural environment.</p> <p>As part of the EA process, several studies will be conducted including terrestrial and aquatic impacts, as well as geotechnical and coastal studies. The Alternatives that are developed as part of the EA will be designed and evaluated on their ability to address community needs with respect to providing access to and/or along the shoreline and an enhanced experience, along with addressing slope stability and erosion risk, while also enhancing aquatic and terrestrial habitats, where possible</p>

Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference

Theme	ToR Section Reference	Comment	Response
		<p>I think there is a very good reason why the City of Toronto has always prevented development and discouraged human traffic along these unstable sand cliffs.</p> <p>I think there are plenty of safer areas for people to walk in the city. This type of isolated location is not ideal for safe walking. And the potential environmental damage could be catastrophic.</p> <p>The excuse of wanting better access for emergency services is ridiculous. Why do we need emergency services down at this isolated location? The only reason is that some of the few people who currently access the area, are getting hurt. People slip or fall, or perhaps harm has been done to them. Whatever currently requires emergency help will increase a hundred fold if we turn this shoreline into an easily accessible area.</p> <p>I believe the City should abandon this proposal.</p>	
	3 Alternatives to the Undertaking	The Environmental Assessment Terms of Reference (ToR) are intended to provide a “road map” to what will be done during the course of the EA itself. Throughout the consultation on the ToR and outlined in the ToR the City indicates that transparency is a key part of the process. However, by saying “do something” as the alternative and not providing a breakdown on what is being considered for each segment of the study area there appears to be no transparency. Many residents from the study area participated in the consultation activities on the ToR but when chatting with some of the residents that attended they are not clear on what is actually being considered for the area. This would not seem to demonstrate transparency in the process but instead it would seem that the City is asking for approval of the ToR that will provide them with the opportunity to identify alternatives and select the preferred alternative based on what the City wants and not what the EA process has determined.	<p>The EA Act requires proponents to review two types of Alternatives: Alternatives To the undertaking and Alternative Methods. The ToR has been revised to indicate what types of components might comprise ‘doing something’. As part of the ToR, we assessed Alternatives To the undertaking; as part of the EA, we will generate and evaluate Alternative Methods. Section 4 of the ToR details how the Alternative Methods will be developed, including how the footprint will be established and the desired design elements.</p> <p>It is incorrect to suggest that the City will select an Alternative in a manner that is not transparent. Section 4 of the ToR details how the Alternatives will be developed, including how the footprint will be established and the desired design elements that may be included in each. Section 6 outlines how consultation will be undertaken at each step of this decision-making process. The public will have an opportunity to comment on the proposed Alternatives before they are finalized and evaluated.</p>
	3 Alternatives to the Undertaking	The Scarborough Waterfront Project (located east of the study area) provided an outline of the problems and opportunities and what alternatives would likely be considered for different sections of the study area. Stating that “do something” is the alternative being evaluated does not give the public or directly affected residents any idea as to what may be considered for the different segments. For example, will a trail be considered for the entire study area or only portions? The ToR state that high-capacity or twinned trails for cyclists and pedestrians are well used but even information as fundamental as the trail requirements is not clearly presented in the ToR. For this study what is being considered along the waterfront?	<p>The Scarborough Waterfront Project provided an outline of the problems and opportunities and what Alternatives would likely be considered for different segments of the Study Area during the EA, not the ToR.</p> <p>Section 2.2 of the ToR outlines the plans and guidelines that provide the background to pursuing ‘doing something’ and details documents like the City of Toronto’s Multi-use Trail Design Guidelines (2015), which will be used to guide the design of the trail. As required by the <i>EA Act</i>, all reasonable Alternatives will be considered including trail connections at the bottom and top of bluffs across the entire Study Area.</p>
	3 Alternatives to the Undertaking	Draft ToR clearly state that this will be a Focused EA but then it appears that these is a level of evaluation on Do Nothing and Do Something under Alternatives To. It states that these will be evaluated under Alternative Methods so why is there a discussion on the evaluation of Do Nothing and Do Something under Alternatives To?	<p>As described in Section 4 of the ToR, the Alternatives To the undertaking for a waterfront project are not discrete. As such, and as has been done for other similar waterfront projects, we are relying on previous studies to support if we should do something or do nothing. Pursuant to the <i>EA Act</i> this is referred to as focusing.</p> <p>Previous planning for the waterfront has confirmed the need for a holistic solution that addresses access, improved experience, erosion, and habitat improvements. As detailed in Section 5 of the ToR, each Alternative developed will present a holistic solution which addresses all of these aspects.</p> <p>The <i>EA Act</i> requires proponents to assess the “Do Nothing” Alternative for both the Alternatives To (identified during the ToR phase) and Alternative Methods (identified during the EA phase); therefore, for each segment the “Do Nothing” Alternative will be assessed against the other Alternatives.</p>
	3 Alternatives to the Undertaking	Do Something gives the impression that anything can be done anywhere and does not provide guidance as to what may be considered and designs to be further evaluated in the EA. It is difficult to support the ToR when there are no limits as to what is being considered in each segment and then how this will be evaluated.	<p>Previous planning for the waterfront has confirmed the need for a holistic solution that addresses access, improved experience, erosion, and habitat improvements. Section 4 of the ToR presents the framework we will use to identify Alternative Methods early in the EA. This section details what will be considered for each segment and how the Alternatives will be evaluated.</p> <p>Section 2 of the ToR provides a detailed description of the problems and opportunities across the Study Area. For the SBW Project, all components are applicable to all segments.</p>

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
	3 Alternatives to the Undertaking	There are other way of connecting the trails apart from building a new trail. Alternatives in the “do something” category should also consider non-trail alternatives, such as a water link (ferry/shuttle). Other cities like Copenhagen have a functioning high speed water link between strategic points in the city and recreational areas. I would like the city to consider an electric hydrofoil shuttle between the Harris treatment plant and the bluffs as an alternative to building a trail. It is not clear if alternatives like this are being considered (they also enable people to “enjoy the waterfront” and to connect the trails). Not everything that we want to enjoy needs to be trampled on. Who is deciding on the alternatives to be discussed and are out-of-the-box solutions like the one I am proposing within the scope of the TOR?	The Alternatives will be developed as part of the EA and will be designed and evaluated on their ability to address community needs with respect to providing access to and/or along the shoreline and an enhanced experience, along with addressing slope stability and erosion risk, while also enhancing aquatic and terrestrial habitats, where possible. As required by the <i>EA Act</i> , all reasonable Alternatives will be considered . These will be made available for broad public consultation and we will welcome your ideas during that phase to inform or improve them.
	3 Alternatives to the Undertaking	Is “Do Nothing” off the table?	No, the “Do Nothing” Alternative will be carried forward at every stage of the Alternatives evaluation process.
Alternative Methods	4 Description, Evaluation & Rationale for “Alternative Methods”	I live in the proposed area along with my family. We make regular use of the beach from silverbirch to the water treatment centre, as a place to exercise and have our dog swim. I have concerns this utility will be taken away as part of this project with no other place for this to be done in the future. My wife and I also use stand up paddleboards to paddle east of the water treatment centre. I have concerns that this may not be possible with future changes to be made. Would ask for the following considerations: * Include utility of this area to include family of dog owners and access to water. * Include utility of this area to include use access to the water for non-motorized equipment for fitness and pleasure along the path. Utility should not just serve more people, but serve a diverse and inclusive array of activities and interests. This will make a vibrant community which I am sure aligns with the goals of this endeavor.	<p>TRCA and the City understand the importance of the Silverbirch Dog OLA to local residents. During the EA phase of the project, Alternatives will be generated for trail connections from Silver Birch to Warden Ave and those Alternatives will be assessed for their impacts based on the preliminary criteria and indicators listed in Table 4-1 of the ToR. Any impact to the dog OLA will be considered against the other negative and positive impacts of each Alternative.</p> <p>The Alternatives developed will be evaluated with respect to the ability to provide access to the water’s edge and support a variety of recreational activities. As the Project advances, the Project team will also coordinate with the City’s Parks and Recreation team that is leading the OLA Strategy for updates on the OLA SOGR program.</p>
	4 Description, Evaluation & Rationale for “Alternative Methods”	Residents that live in the area, including some backing onto the shoreline area, have participated in the consultation process to date and are uncertain as to what is being considered and what the ToR addresses. The “do something” is so broad and nowhere is it indicated what is actually being considered in general or what alternatives (based on the problems and opportunities present) will be developed so how can residents provide meaningful input at this point in time?	Section 4 of the ToR details how the Alternatives will be developed, including how the footprint will be established and the desired design elements. Section 6 outlines how consultation will be undertaken during the EA and the Alternatives will be available for public comment during the first round of consultation for the EA.
	4 Description, Evaluation & Rationale for “Alternative Methods”	Consideration should be given for pausing the current ToR process and doing additional work to be clear and transparent and to identify potential alternatives or at a minimum problems and opportunities that would be considered (e.g., trail, shoreline protection, infill) for the different segments of the study area. The City has stated a desire to fast track this EA. They have also mentioned the complexity of the study as one of the reasons for the "Do Something" approach. Additional time would allow the City to resolve the complexity to the point where they can actually provide real alternatives to the general public. This additional time would also allow residents to better understand what is being proposed as well as giving the City the opportunity to address comments received from residents in the area and to proceed to seeking approval on an EA that more fully follows the EA process. Since the ToR are intended to be a road map for the EA it is difficult to have “do something” which is far too broad as the basis for developing alternatives and undertaking a comparative evaluation. This pause in the process should consider whether additional consultation is needed on the ToR. At present reading through the ToR it is not clear what type of trail is being considered (e.g., high-capacity, twinned, smaller scale), is lake infill considered and only for shoreline protection and erosion control or for beaches, what are the recreational activities being considered, how will parking be handled, to name a few?	The ToR Section 4 sets out how the Alternatives will be developed during the EA, consistent with the MECP’s “Code of Practice for Preparing Individual Environmental Assessments”, and consistent with other similar approved waterfront EAs. Section 4 of the ToR details what will be considered in the development of Alternatives. Residents will have an opportunity to review the preliminary Alternatives during the first round of consultation of the EA stage. All of the issues listed will be addressed during the EA.
	4 Description, Evaluation & Rationale for “Alternative Methods”	A 4.5km trail waterfront trail with adjacent recreational opportunities will require washrooms. The feasibility and ongoing maintenance of sanitary facilities (water and sewer) needs to be identified in the ToR and assessed through the EA. Particularly due to the length of trail, the challenging topography, and the discouraging of infrastructure in regulated areas.	Any requirements for new sanitary facilities will be addressed for the Preferred Alternative in the later stages of the EA. It is unlikely that these types of facilities will be provided at the water’s edge.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
	4 Description, Evaluation & Rationale for “Alternative Methods”	Step 2 (page 25) states that the “Alternatives must be able to provide improvements to safety as it relates to erosion and beneficial uses for both human recreation and the ecological system.” Why are these the reason for identifying an alternative, specifically human recreation? How does this give consideration to anyone living in or currently using the area. Increasing recreation opportunities is often found to result in conflict with and not be beneficial to the ecological system.	Step 2 does not provide reasons for identifying Alternatives, rather it identifies design elements that may be included in each Alternative, and this has been clarified in the Final ToR. Table 4-1 details the preliminary criteria and indicators that will be used to evaluate Alternatives. Under the Consistency objective and the Cost objective, there are indicators that assess compatibility with existing land use and property requirements.
	4 Description, Evaluation & Rationale for “Alternative Methods”	Many existing roads near the waterfront in the Study Area are very steep (up to approximately 20% grade). Where is this taken into consideration for a preference to providing access to the waterfront? Beach access locations should not be considered where the new access relies on existing roads that do not meet accessibility guidelines in accordance with the holistic approach advocated by the EA.	Opportunities for access to the waterfront will be investigated as part of the development of Alternatives in the EA. Steepness will be addressed in the design of the access by either lessening the slope or providing rest areas.
	4 Description, Evaluation & Rationale for “Alternative Methods”	Install signage to inform the public about erosion and risk Management, the importance of connectivity, Lake Ontario as a source of drinking water etc. Including Indigenous education and installations - both in terms of signage but also plans for how to activate spaces and communicate the spiritual significance of land and water. Allowing areas to stay wild is important - there are beings other than humans that need the forest and shoreline to be free of urban development. If lights are installed for night safety - choose warm tones, human scale, calming - not high blue top down lighting. Think Park La Fontaine in Montreal.	Comment noted. Many of your suggestions will not be addressed until the project enters the detailed design phase.
	4 Description, Evaluation & Rationale for “Alternative Methods”	The ToR needs to contain additional information on the engineering standards to be used during the EA.	The City has guidelines for trail designs that will be referenced when generating Alternatives. As detailed in the revised ToR Section 4, the footprints will be developed based on the risk lines at the top and toe of the bluffs and coastal engineering conditions (detailed in Section 5 of the ToR) and modelling.
Potential Impacts	5.3.2.4 Parks and Recreation	We are highly concerned about the effect this possible shoreline trail would have on our small beach just west of the filtration plant. It is difficult to imagine how a 15 ft wide paved road could go through this section of narrow beach between Silverbirch and Nursewood. This area is an off-leash dog park. We don't see much at all in your terms about this unique section of the possible path. We certainly don't want any fences blighting our special beach. We have concerns regarding privacy, light pollution and noise with such a path passing so close to our homes. We are worried this path would become a sort of highway for e-bikes and e-scooters to avoid the gridlock of Toronto. These vehicles can go very fast and do not have any insurance. This is a big safety concern for us as we see how the e-bikes and e-scooters are taking over the M-G trail with no bylaw enforcement. We would like to see this section of the beach removed from your plans altogether. Focus on the issues east of filtration plant and the Bluffs.	This section of the shoreline between Silverbirch and the R.C. Harris Filtration Plant was added to the Study Area to explore the connection to the Martin Goodman Trail as part of a larger active transportation network. During the EA, the team will study all reasonable Alternatives for providing a continuous trail connection and compare them to the "Do Nothing" Alternative. Please note that nowhere in the ToR is there discussion of a road being explored. The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the City of Toronto's Multi-use Trail Guidelines (2015) and, where feasible, trails will be made accessible to all users. Trail widths range depending on the need, desire or site conditions, but generally the paved surface can range from 2.7 m (~8.8 ft) to 4.1 m (~13.5 ft). Trail widths, and potentially surface material, can also vary depending on site conditions, and ToR outlines that we will be guided by the City's Multi-Use Trail Guidelines.
	5.1 Physical Environment	I'm emphasizing the importance of maintaining the natural land and its conservation as much as possible. My concern would be the damage that is likely to occur if the land near the shoreline is opened up as a thoroughfare, from west to east, and the fear of overuse and decimation of the area. Whereas the interrupted access, but one that is planned taking into consideration the unplanned access already in existence, might be preferable.	The Study Area has been impacted by past and on-going human use. Currently, people are accessing the shoreline via informal paths and trails, which impacts local flora and fauna. As part of the EA process, natural and aquatic impacts are explicitly factored into the evaluation and selection of alternatives, and opportunities for further conserving and enhancing natural and aquatic habitats will be explored. Alternatives will consider both tableland and shoreline connections.
	Table 4-1	Parking and transportation do not seem to be part of the evaluation of alternatives? How is it possible for transit and active transportation to allow the public and residents to reach the waterfront throughout the entire study area? There should be consideration for impacts on the existing communities from traffic coming to the area and parking. This will be a key issue for consideration given that some streets will not be able to handle the increase in traffic and parking. It will be challenging to encourage most users to utilize active transportation or transit when they will be there at non-business times (which may have limited transit schedules) and many families will find it too difficult to bring everything on transit. Parking and traffic should most certainly be part of the	Table 4-1 includes preliminary criteria and indicators that will assess the potential for impacts to existing communities and land uses, and the proximity of access points to active transportation networks and transit. Where possible, the provision of parking around access points will be studied. Should the Preferred Alternative include a continuous trail, it would likely become part of the City's active transportation network to improve connections throughout Scarborough and the rest of the City.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
		comparative evaluation for this project. Some of the segments may be better off not having access to the waterfront due to parking and vehicle accessibility to the area.	
	Table 4-1	What is the risk that there will be property loss due to development of the trail, access, vistas or to ensure EMS or City worker access? Given the level of development in the study area it is challenging to think that some of the properties won't be negatively impacted. This should be evaluated and minimized to the extent possible.	Table 4-1 details the preliminary criteria and indicators that will be used to evaluate Alternatives. Under the Consistency objective and the Cost objective there are indicators that assess compatibility with existing land use and property requirements. Landowners are being met with throughout project planning and property related discussions will occur once property requirements have been identified.
	Table 4-1	Consideration should be given for Impacts from increased users to the area. For example, additional garbage and litter, more access which may result in more informal trails developing, etc. Impacts to existing communities from additional people being present. It is not likely that they will only stay on the existing trail.	Table 4-1 details the preliminary criteria and indicators that will be used to evaluate Alternatives. Under the Consistency objective and the Cost objective there are indicators that assess compatibility with existing land use and property requirements. There will be increased users to the area given trends in recreation and increased housing density whether or not this project is built.
	Table 4-1	Why is the maintenance and operations only applicable to shoreline works? Should it not also consider parking areas, roads, additional parks, etc. There are two aspects to this with one being the shoreline protection works and maintenance required and then secondly maintenance and operations of trails, parks, access routes, etc.	Maintenance and operational costs have been removed from the table as they cannot be predicted with much certainty and thus will not aid in the evaluation of Alternatives. Capital costs will be the focus of the evaluation of Alternatives.
	Table 4-1	Property acquisition or easements does not seem to be part of the alternatives evaluation yet this can provide critical information for consideration when comparing alternatives. Why would property issues only be discussed once the trail is selected and if it will impact private property? This should have been taken into consideration into the evaluation of alternatives and not left to the end of the process as issue to deal with after the EA is complete.	Table 4-1 details the preliminary criteria and indicators that will be used to evaluate Alternatives. Under the Consistency objective and the Cost objective there are indicators that assess compatibility with existing land use and property requirements. Landowners are being met with throughout project planning and property related discussions will occur once property requirements have been identified.
	Table 4-1	With respect to the Objective conserve, create and enhance terrestrial and aquatic habitat natural features and linkages, the indicators do not account for a preference for minimizing impacts to existing natural environments to meet this objective. Is consideration given to the fact that beaches and natural areas are already present in the area?	Consideration is given to all the existing conditions. The indicator definitions in Table 4-1 articulate how preference will be measured given the project is trying to create ecological benefit in addition to minimizing negative impacts.
	Table 4-1	With respect to Criteria Extent of aquatic habitat enhanced or diminished, It is not clear from this indicator and the alternatives to be considered as to whether this project may involve extensive lake infill or how additional aquatic habitat may be created. Indicators seem to identify that additional diversity will be preferred yet it doesn't prefer or recognize that there is diversity currently existing.	Criteria and indicators measure change from existing conditions. Some project Alternatives are likely to include lakefill and aquatic habitat creation will be done consistent with the Toronto Waterfront Aquatic Habitat Restoration Strategy detailed in Section 2.3.2.
	Table 4-1	With respect to Indicator Ability to minimize public safety risk for trails along water's edge, What this would require since any trail along the Lake Ontario shoreline is likely to experience this. Will there be avoidance of these areas for a trail or designs with man-made solutions (e.g., armourstone and elevated trails) be the preference? This is not clear by the indicator.	Indicators are comparative measures so have no requirements. If an Alternative proposes a trail that would be subject to overtopping it will be less preferred than an Alternative with no overtopping. The Alternatives may include elevated trails, trails set back from the water's edge, or the use of revetments.
	Table 4-1	With respect to Indicator potential to provide direct public access to and into the water, An elevated trail to reduce risk from overtopping would not provide access to the water. No description is provided as to what type of "access" is preferred? Is this for swimming, walking or what? This is a challenging Study Area to consider providing access to the water throughout.	Indicators are comparative measures so have no requirements. This indicator will measure access to the water and into the water, including the ability to touch the water. We have heard from interest groups and Indigenous community representatives that this is an important attribute.
	Table 4-1	With respect to Indicator potential for change to sandy shorelines, Potential change to sandy shorelines should be minimized would not seem to be achievable if the preference is also to have a safe trail. Protection against shoreline erosion is likely to result in the loss of sandy beaches unless lake infill is intended to bring in sand.	Indicators are comparative measures so have no requirements and measure change from the existing condition. Some Alternatives may present a trade-off between changes to sandy shorelines and the provision of a safe water's edge trail.
	Table 4-1	With respect to Indicator number of viewsheds or scenic lookouts created There currently are viewsheds will this be taken into consideration? How many vistas or lookouts are being considered, as many as possible or a specific number?	The number or vistas or lookouts to be created will be determined once the Alternatives have been developed.
	Table 4-1	With respect to Indicator consistency with the Integrated Shoreline Management Plan One recommendation was "improve public parking" yet this is not considered in this study nor are potential traffic issues to the existing neighbourhoods.	The Alternatives will consider the provision of additional parking near access points, where possible.

**Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference**

Theme	ToR Section Reference	Comment	Response
	Table 4-1	With respect to Criteria of maintenance and operations costs, Where is there consideration for an alternative that is challenging to construct (e.g., engineering and costs)? There is only consideration for maintenance and operation costs.	There is a separate criteria for capital costs which will include consideration of the challenge of constructing an Alternative.
	Table 4-1	Just wondering if a study of past effects of human use of, interaction with and care of waterfronts, parklands and even picnic areas with lots of garbage disposal opportunities. Who will pick up after use, get to bins before wildlife does and monitor and teach about dangers of beach fires in these times. Hate to be a downer but I don't have a lot of faith in people these days and their concern for people and other life around them. People seem to change the rules to suit themselves, not the greater good!	Creation of formal access to and from the shoreline will allow greater access for the City to maintain the trails, including allowing for garbage collection. Maintenance of the trails is an operational issue and will not be addressed in the EA.
Consultation	6 Consultation	The Aboriginal groups consulted must have funding to meaningfully participate and time to provide input. The traditional female waterkeepers among those groups should have a say. A very basic plan with minimal expenses that provides for safe, environmentally conscious use of the area under consideration should be developed with shortened time frames in case none of this ends up being funded. An alternative that is affordable, quick and reduces the current risks to public use should be offered including lifesaving equipment and emergency vehicle access as well as a means of contacting the police. People are already risking their lives swimming from access points just off Fishleigh that are dangerous and expose the City to liability risk. This summer and fall there should be people from the City or the Conservation Authority down at the waterfront area under consideration, observing the current use to contribute survey and other data on how it is currently being used by the public	Treaty Holder, Indigenous Communities, Urban Indigenous organizations and residents are actively being consulted with. This EA will identify Alternatives that address the access, risk and public use issues you identify. Unfortunately, none of these issues can be addressed with minimal expense and without EA approval. City and TRCA staff have and continue to visit the waterfront and observe uses. Swimming off of Fishleigh is not encouraged by the City and is done at the risk of the individual.
	6 Consultation	Public outreach for this project has been poorly communicated: ie, no signs at the south end of Silverbirch and one sign at foot of Nursewood which was mostly hidden by vegetation. The Draft Terms of Reference and Consultation record bury/don't explain important aspects of the study.	There have been four (4) rounds of outreach with the public since the project commenced. Section 3 of the Record of Consultation contains a summary of the outreach by consultation mechanism type. One of the purposes of the EA process is to receive feedback from the public. The ToR is the first phase of that process. An additional three (3) public open houses will be held as part of the EA phase. Section 6 of the ToR outlines how consultation will be undertaken at each step of the decision-making process. The Record of Consultation available with this ToR documents the consultation undertaken during the development of the ToR.
	6 Consultation	Desire for increased public consultation and clarity on the process.	. The level of consultation and engagement is aligned with other projects of this type and with other Individual (now Comprehensive) EAs, and is consistent with the MECP's "Code of Practice for Consultation in Ontario's Environmental Assessment Process". The consultation proposed in the ToR (Section 6) to be undertaken during the EA is the starting point and consideration will be given to expanding consultation activities during the EA.
Report Edits	General	The name of the project (i.e. revitalization) implies the project study area needs to be brought back to life.	Use of the term Revitalization was to link the project to the 2022 City staff report (Next Phase of Waterfront Revitalization) which speaks to the next phase of waterfront revitalization. We have removed the word revitalization from the project name to assist with clarity on the project's intent.
	2.5.1.1 Habitat Integrity Key Problems	Because "The Needles" is defined later on in the report, the text should explain what it is here.	Edit has been made to the text to provide definition.
Scarborough Waterfront Project	2.1 Planning Context	Page 1, 8, 9 and 15 - although it is not definitely stated in the Terms of Reference, I assume that all TRCA studies conducted for the SWP Environmental Assessment will be considered in the EA for the Scarborough Bluffs West project, including the 2012 Scarborough Shoreline Study. I do note that they are referenced in the bibliography. There is no direct comments about integration of the Scarborough West and East projects, noting that they will be connected. This should be done to avoid duplication of effort and in facilitating funding for both projects. I note that although the SWP EA was approved in 2019, there has been very little progress made to date, and it is unclear what section will take priority. I question why the West section is proceeding when the east section remains unfunded and no progress has been made.	TRCA studies conducted for Scarborough Waterfront Project EA will be considered in the EA for the SBW Project. Funding has been secured and construction will soon begin on the Brimley Road South Multi-Use Trail approved as part of the Scarborough Waterfront Project EA. Project funding is at the discretion of City Council. The Scarborough Waterfront Project and SBW Project connect at Bluffer's Park and there is little overlap between them.

Summary Disposition of Public Comments
Scarborough Bluffs West Project – Terms of Reference

Theme	ToR Section Reference	Comment	Response
	2.5.3 Access to & Along the Waterfront	Brimley Rd. down to Bluffers Park: we drive to Bluffer's Park at all times of day/week. It's terrible that there is no complete pedestrian walkway down to the beach. With the increased traffic and buses, it's even more dangerous than it was before. I applaud increased access- but please fix the road and make it safe for walkers!	As part of the Scarborough Waterfront Project, an EA completed in 2019, construction of a multi-use trail is planned for Brimley Road, with works expected to begin later in 2025.
	5.3.1.3 Future Land Use	When the studies were completed for the East SWP, all development proposals within the study area were looked at before submission and approval of the EA. However, just after submission the developers came along with numerous proposed condo sites along Kingston Road, the most consequential one being Windy Ridge adjacent to the Bellamy Ravine and Doris McCarthy Trail. In considering this development, we requested that the TRCA become involved and review this proposal, but this did not occur even though it is directly adjacent to a Natural Heritage System, ESA and ANSI. The City Planning and OLT did not even review or consider the extensive TRCA studies conducted for the Final SWP EA when approving this development. In my view, these studies cost the taxpayer millions of dollars and should be considered when reviewing development in this environmentally sensitive area.	<p>This comment is incorrect. All development proposals within the Study Area were not looked at before submission and approval of the Scarborough Waterfront Project EA. The studies undertaken to support the Scarborough Waterfront Project EA were focused on the shoreline.</p> <p>TRCA has limited jurisdiction to comment on development proposals as per recent legislative changes.</p>
	5.3.1.3 Future Land Use	Some more information on the Scarborough Waterfront project would be useful, particularly on what is being done in the east section (specifically, related to the break in the trail between Bluffer's Park Beach and the paved trail at Sylvan Park/Bellamy Ravine.) This is important because the current study area will be affected if the path is extended eastward.	The SBW project builds on the approved Scarborough Waterfront Project EA. Information about the proposed shoreline improvements and trail connections can be accessed in the Scarborough Waterfront Project EA available on the TRCA website .