

## Comment Summary Table

**Proposal:** Terms of Reference for the Scarborough Bluffs West Project Environmental Assessment

**Proponents:** Toronto and Region Conservation Authority and City of Toronto

### Public Submitters:

Comments	Proponent's Response
<p>I am a resident in the area being studied and I would like to make a suggestion. My suggestion is for an enhanced trail that would run from Brimley Rd to Silver Birch Ave. This trail should have street lights (solar powered). It should be paved have enough room for cyclists, walkers and joggers to use. Thank you for the consideration.</p>	<p>The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the standards of the <a href="#">City of Toronto Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p>

Comments	Proponent's Response
<p>I want to preface this stating the City of Toronto has done a marvelous job building a comprehensive network of multi-use trails.</p> <p>That said, I am concerned that with the development of the Scarborough Bluffs West Project we're about to lose the last true wilderness in this city.</p> <p>Once it is gone, we are all going to have to drive several hours to find a similar sanctuary.</p> <p>I hope we can find a good balance between access and conservation of solitude and nature.</p>	<p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats, where possible, will be explored (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p> <p>A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p>

Comments	Proponent's Response
<p>I invite you to come to the bottom of Valhalla Blvd, and witness the erosion of the Bluffs. Your project is not safe to do as long as the Bluffs are unstable.</p>	<p>A key objective of the project is to minimize natural hazards and risks to public safety caused by erosion. As part of the Environmental Assessment, any 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. Top of bluff (tableland) trails will also be developed for evaluation, outside the erosion hazard area.</p>
<p>There is a unique biodiversity between the Bluffs and the lake. How dare we invade the last natural environment left in the city. For what? So cyclists can ride? Your Toronto Conservation report is useless to us. It doesn't receive any money to help the Cathedral Bluffs environment. The TC is only interested in its creation, Tommy Thompson Park in the spit. Their pet project.</p>	<p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
<p>The Cathedral Bluff is fragile. Your committee and its plan will mar its beauty while it stands, because you want to pave a path along its shoreline.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>Please note that the Cathedral Bluffs are outside of the Project Study Area, on the east side of Bluffer’s Park.</p>

Comments	Proponent's Response
<p>Have you ever travelled to Bluffers Park on a weekend? The amount of people and traffic disturbs its local neighbourhood is disruptive. My co worker lives on Thatcher. He is unable to access his home, which is [REDACTED] [REDACTED] from Kingston Rd. during the weekend unless he negotiates to it from the east. That adds at least a half hour or more to his journey home from work. Yet, you want to increase the human population through that area and through Birchcliff Village. Again, so much for protecting the environment. Where are the deer, coyote, raccoons, foxes, mink, otters, water fowl ....should I continue? Where will they go? How will you protect them while you pave?</p>	<p>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.</p>
<p>Do you listen to the residents of this area? No! If you lived here then you would sing a different tune. Yes, I am disappointed in your committee's lack of empathy to our community and the environment that we live beside.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Once again I repeat this suggestion -  
\*it is completely obvious the needles are dangerous ,so remove the needles and run Midland down to the lake \*

This is my comment again in writing after being suggested in the zoom what consideration have you given it have you given it the consideration that it's due to provide secondary access ?  
for your consideration...  
From under cliff  
Sacrifice the park south of the tennis courts to gain a safe profile !!!  
in order to give us looping access for two accesses so there is Brimley and Midland \*\*\*\*\* (2 Dual !)  
A secondary access is what is missing!  
right?  
I worked for 3 years at the location underneath the needles watching film sets for the Handmaid's tale  
Walking underneath the needles every morning as the sand continually fell like a timer  
A sand glass ,a sand timer, an hourglass telling us it's time to realize Midland is a necessary access !  
it will keep falling until it turns back to 45°  
And as it recedes to 30-45°,  
no matter how much everybody would rather see a bluff there which is dangerous  
it is the only dangerous \*threatening\* location in the whole study area !  
right ?  
Fact check please !  
Specifically what other dangerous locations listed in the study nothing else listed as dangerous ?  
Is there anything else which is listed and described as being dangerous ?  
why not remove the danger ?  
is there anywhere else as important that you can see ,which need\$ remedial action?  
which causes great consideration and planning about how far out is dangerous instead of facilitating a road by removing it thus removing the danger !!!

A key objective of the project is to minimize natural hazards and risks to public safety caused by erosion. A number of trail alignments and access points to and along the shoreline will be explored based on site constraints and impacts, including continuous shoreline trails, top of bluff (tableland) trails, and a combination of both. In addition, opportunities to provide access from the tablelands to the shoreline will also be explored, including opportunities that may be available at Midland Avenue.

People used to use the Midland ravine for Lake access if you look at the hundred year old pictures hundreds of people climbing up and down Midland ravine the angle is correct !

Did you look at the old archive picture of people using Midland ravine yet ? Once installed if I could run down and up Midland ravine just as they could up and down brimley road just as emergency vehicles can and will at some point in the future I feel

Please see the picture of me

How to picnic with my parents proving that I have been observing the Bluffs for a long long time as they recede

It shows me under the bottom of the needles hanging off a wire on a cement platform which is at the base of Midland ravine because that's where they used to lift up and down loads of goods to the ships

Fact check the history now please so you see why they did what they did right there ! why not return to the transport of, if not goods - then people up and down Midland ravine using public transportation by bus

Or ambulance ?

It connects perfectly well with transportation hubs TTC/GO

Kingston road , Scarborough Go station

And could it possibly be any closer to Kennedy station ?

Of course it might be best limited only to bus traffic an emergency vehicles not general public because the expensive houses on undercliff and Midland south of Kingston will obviously complain and protest The increased traffic flow just as it upsets the people on brimley road with the idling, noise and garbage of inconsiderate public in non-government vehicles .

Brimley was sculpted to prevent further falling

Please verify and understand this next statement \$20,000 is spent every year to check the blue pipes with a video camera

Response Cont'd

if you're not aware of this the trca does it ?!

Fact check please ! Blue pipes Square

at the top of the diked, swaled, and drained with culverts draining Swale

storm overflow through sewers under the surface of the reclaimed garbage

dump on the west side of

brimley nobody seems to notice the beautiful profiling or know why the blue

pipes are there or think how they could be applied to Midland for the

access which you want to

consider

as part of your terms of reference

but I was the only person to suggest it at the last online meeting

\*Fact check\*

what consideration has it been given ?

sculptured slopes to determine that no they are indeed not moving and

have not moved in the last 50 years since the sculpting.

The needles are an obvious problem and will fall even after the wave

erosion stops removing the sediments

It is important to have emergency vehicle access if one road gets blocked

Take the bull by the horns

remove the needles

And sculpt a road continuing from the bottom of Midland to the lake through

the ravine

the angle is correct

the clay underneath is correct

It is the same clay that is underneath brimley road

The Edge at the top of the needles will fall back anyways

During my entire life of visiting the Bluffs since I was born at them in 1955

Since I was a baby we had picnics every Sunday underneath the Midland

ravine

I have watched the Bluffs turning to 45°

and no longer being Bluffs

no longer being eroded !

the "scar" in Scarborough named after East coast England where you will

see 45° slopes exactly like the greened and treed areas at

the Bluffs which used to be Bluffs and are now 45° slopes with a vernicular

Response Cont'd

railway which carries people up and down the English slopes using gravity and water  
Watch the TVO show special spend the time to understand the comparison and the reason why the name Scarborough was chosen study the history of Scarborough Castle and  
Scarborough Fair to gain a deeper understanding of the time tested solutions which we don't seem to prioritise as being The logical solutions !  
why not ?  
what are we missing ?  
we're missing studying Scarborough in the Midlands in England !!!  
So "giggle it" I say !  
Have a lucky look so you understand !  
Study the angle of the residual slope to see what will happen on our slope sooner or later  
if we observe what has been happening and study the history we will see the logic  
does nobody have a long-term view ?  
Compare with Scarborough in England  
Study the history  
see what has happened since 1940s pictures  
and look at the old pictures of what the Bluffs used to look like before the erosion control  
Please tell me you have done this before you judge this suggestion  
These Bluffs used to be called birchcliff  
Because they were covered in birches  
But nobody has been planting birches  
why not ?  
Erosion control on the sides of Midland Avenue South Connection can be accomplished with wild roses and wild grapes as the trees begin to spread down and up the slopes and why ignore the beneficial species which seem to be the most logical to replant while reclaiming the slopes sides beside Midland as it depends the bluff  
Please note the beneficial species in the sign that we suggested that was not posted by Toronto Council  
Why not ?

Response Cont'd

Comments	Proponent's Response
<p>what species would you suggest for erosion control aside the Midland extension through Midland ravine that is my suggestion          Please take a moment to study the old pictures and compare them with what the Bluffs look like now in order to understand my suggestion.          And why I have watched as The Bluffs are going going gone.          Your comments &amp; feedback would make this worthwhile</p>	<p>Response Cont'd</p>

I have attended several meetings regarding the proposed project along with many residents who will be affected by the attraction of more visitors to the area. I live on Fishleigh Dr. which is demarcated as part of Waterfront Trail. With the increase in car, pedestrian and cyclist traffic, the street will be made even more dangerous for the many residents who walk on Fishleigh with dogs, children, strollers etc. because THERE ARE NO SIDEWALKS!

WE HAVE ASKED FOR SIDEWALKS TO BE INSTALLED but so far there are plans only for a short section at the end of the street along the park which does nothing to protect the people walking along the residential area. There is nothing to slow or stop the cars and trucks **racing** from Glenn Everest to Midland. Pedestrians often must jump onto lawns or stick closely to the dirty edge of the road to avoid being hit especially when two cars are passing and filling the whole space on the road.

Once again, I ask, beg, planners to come here to see for themselves the dangerous situation which is going to be made worse in the near future. Pedestrian safety should be an utmost priority in planning for the area.

Thankyou for your attention to this matter and for bringing it to the attention of planners and officials at the City of Toronto and the TRCA.

A key objective of the project is to improve how people access, move through and experience the waterfront.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.

The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

While it is outside of the scope of this project to plan for new sidewalks in the Study Area, where a multi-use trail is explored as part of the options in the Environmental Assessment phase, it will look to accommodate pedestrians and cyclists safely. The feasibility of tableland trails in the general area that you reference will be explored in the Environmental Assessment phase.

Comments	Proponent's Response
Comment Cont'd	<p>Table 4-1 includes preliminary criteria and indicators that will assess the potential for impacts to existing communities and land uses.</p> <p>The public will have an opportunity to review, and provide comment on, the preliminary Alternatives developed, and the proposed criteria and indicators that will be used to evaluate them, during the first round of consultation of the Environmental Assessment stage. Alternatives will then be evaluated to assess the potential positive and negative effects on the environment, the neighbouring community and the broader community.</p>

Comments	Proponent's Response
<p>I am a 45 year resident of south Scarborough at Warden and Kingston Road and I would like to add my suggestions for the Scarborough West Bluff Project consultation, repeating what I believe I already submitted earlier in the process.</p> <p>1) In order to improve public access and egress restore the so called "steps" which existed back in the 1920s or earlier. These have faded from memory but I recall reading research about the 99 Steps, the 121 steps etc which were meeting points for groups gathering for a picnic by the water 100 years ago. Those steps were made of wood and deteriorated over time and were eventually torn down. New steps should have a ramp beside them so people can wheel their bikes up or down with ease. Other similar access points should be considered such as the bottom of Warden Ave. Birchmount and Midland</p> <p>2) As part of better access, the path known locally as "Construction Hill" immediate to the eastern side of Rosetta McLain Gardens should be repaired to make it easier for the public to descend or climb, especially if they are pushing a stroller or a small cart to set up on one of the beach bays.</p> <p>3) In order to make the pathway for multiple modes of transport - bicycles, strollers or pedestrians - more useable there should be an easy access from the western most point which is the east side of the RC Harris Water Treatment plant.</p> <p>Further, at the eastern most end of the pathway where it terminates at the water across from the western edge of Bluffers Park, an elevated footpath should be built to connect the two waterfronts and similar treatment at the far eastern end of Bluffers park for people to either continue the path all the way to East Point Park or to exit the waterfront and go up the Bluffs to Kingston Road for surface transportation.</p>	<p>Thank you for your suggestions. We will take this feedback into consideration as part of the Alternatives development and evaluation during the Environmental Assessment phase.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The areas you noted will be studied further in the Environmental Assessment phase.</p> <p>The public will have an opportunity to review, and provide comment on, the preliminary Alternatives developed during the first round of consultation of the Environmental Assessment stage. Alternatives will then be evaluated to assess the potential positive and negative effects on the environment, the neighbouring community and the broader community.</p>

Comments	Proponent's Response
<p>I am highly supportive of this project. Making the Scarborough Bluffs accessible for all should be top priority. Right now it's very difficult to access them to enjoy.</p> <p>I'd like to see a continuous paved multi-use path from Silver Birch in the west to Bluffer's Park in the east. I'd like to see a continuous paved multi-use path from Silver Birch linking up the existing waterfront paved multi-use path at Beechgrove in the east.</p> <p>Thanks for your consideration. Let's get this project done sooner rather than later.</p>	<p>Thank you for your support and suggestions. We will take this feedback into consideration as part of the Alternatives development and evaluation during the Environmental Assessment phase.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The public will have an opportunity to review, and provide comment on, the preliminary Alternatives developed during the first round of consultation of the Environmental Assessment stage. Alternatives will then be evaluated to assess the potential positive and negative effects on the environment, the neighbouring community and the broader community.</p>

I live in the Scarborough Bluffs area and would like to be kept informed on the exploration to both enhance human experience along the water while simultaneously protecting the ecosystem.

Your notice of submission set out broad main points yet was vague on over-all direction the project might go in.

Presently, and from time to time there is late night and early morning activity which often includes fire works explosions coming from Bluffer's Park, Scarboro Crescent Park and Scarborough Heights Park. I am uncertain what effect enhanced access to the bluffs will have on this activity but it is cause for concern.

Please contact me should you have any questions or comments.

The best way to stay informed of project updates is to join our [mailing list](#) and watch for updates on the [project website](#).

The Scarborough Bluffs West Project will explore the enhancement and protection of sensitive shoreline and natural areas and opportunities for improved waterfront experience and access between the Eastern Beaches (Silver Birch Avenue) and Bluffer's Park along Lake Ontario. The project will consider opportunities to:

- Improve how people access, move through, and experience the waterfront
- Preserve and enhance the natural environment, including the cultural significance of the Bluffs
- Minimize natural hazards and risks to public safety caused by erosion

The Alternatives that will be developed during the Environmental Assessment phase will include shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

Comments	Proponent's Response
Comment Cont'd	With respect to the impacts enhanced access may cause, Table 4-1 includes preliminary criteria and indicators that will be used to evaluate the future Alternatives and assess their potential for impacts to existing communities.
<p>I object to the Study Area of the Scarborough Bluffs West Project because of the limit of the study area, specifically at the corner of Brimley Road and Kingston Road.</p> <p>The corner of Brimley Road and Kingston Road limit excludes the water run off downhill, from new developments on Kingston Road at the corner, onto Brimley Road past residences to Bluffers Park and the Marina areas.</p> <p>These new developments include the approved "Bluffersparkcondos.ca" at 2759, 2763 to 2746 Kingston Road, as well as potentially 2746 and 2800 Kingston Road plus the proposed City of Toronto Revitalization Projects on the opposite side of Kingston Road.</p> <p>I raise these issues after more than one flooding experience in the Montvale Road Neighborhood from the approved City of Toronto housing development up the hill on St Clair East, which the City of Toronto approved, without checking the actual construction of the grading.</p>	The Scarborough Bluffs West Project Study Area abuts the northern and western limit of the adjacent <u>Scarborough Waterfront Project</u> Study Area (Bluffer's Park to East Point Park), to close the gap in waterfront access planning with the goal of enhancing access to and along the Lake Ontario shoreline in Scarborough.

<p>I am distressed and enraged to learn that there are plans to install a paved "trail" (you should call it what it is: a road) through the Balmy Beach/RC Harris beach.</p> <p>I oppose this even though:</p> <ul style="list-style-type: none"> <li>- I'm a cyclist and a runner</li> <li>- I don't even live in the beach (so this isn't coming from a nimby perspective).</li> </ul> <p>However, I've lived up the road in East York for 30 years and have been taking my dogs to that wonderful off-leash stretch as long as I've been here. It's a multi-use oasis where beach-lovers and pet-lovers coexist. Just this morning there were kayakers launching from there, families already settling in, and lots of dogs and dog-owners enjoying the water and catching a bit of a break from the heatwave.</p> <p>Your website burbles about an "improved waterfront experience". The current experience cannot be improved upon. All you're proposing is years of construction and waste, the removal of a beloved leash-free park, and the destruction of one of the last beaches Torontians can enjoy.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's</p>
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Comments	Proponent's Response
Comment Cont'd	<p>Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>Please note that nowhere in the Terms of Reference 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 <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>
<p>I am particularly angry that this plan is being developed under the radar. Where was this publicized? Where's the transparency? Instead, it looks like another example of government pushing something through as a done deal with arrogant disregard for what people actually want.</p> <p>This is a precious park. It is just fine as it is. Don't ruin it.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p>The map submitted showing the study area has an incorrect path shown for the Waterfront Trail. The map you have supplied shows the Waterfront Trail shows the trail going through a meadow near the bottom of Chine Drive. This route was fiercely objected to by the local community due to its affects on the fragile meadow natural environment. The route was redrawn to proceed north on Chine Drive to Kingston Rd, East on Kingston Rd to Brimley, then south to the route as shown on your map. If it is the intention of this project to redraw the current map, the project will face strong organised resistance. Please let us know if this is a mistake or a plan to redraw the waterfront trail.</p>	<p>The mapping included in the Terms of Reference is reflective of the existing Waterfront Trail alignment shown on the Great Lakes Waterfront Trail website, along with the on-site signage currently present at the end of Undercliffe Drive.</p>

Comments	Proponent's Response
<p>In a very mistaken decision, the City of Toronto decided not add storm sewers to Chine drive during a complete road rebuild in 2013. They also removed very functional drainage ditches and said the sides of the road could absorb the rain water. This was completely ineffective and replaced years later with curved asphalt to channel the water. I have attached the original drainage report for Chine drive that is riddled with mistakes and incorrect assumptions.</p> <p>The result has been that all the rain water south of the 'high point ridge' at the south end of Chine drive does not go in the expected route (outlet 2), but travels over the private property between █ and █ Chine Drive creating a great deal of erosion. During heavy rain, a rushing temporary river carves the ground between █ and █ Chine. This needs to be corrected and the Scarborough Bluffs West Project provides the project to do this.</p> <p>We would recommend adding a storm sewer between █ and █ Chine Dr to catch the street run-off. This could be piped to the originally intended route (outlet 2) down the pedestrian path downhill south of █ Chine. This well used path is in desperate need of a rebuild and is also part of the Waterfront Trail. See waterfront 'chine storm drainage and path', the drainage flow is shown in red and the path needing rehabilitation is circled in purple. A pipe could run below the path to meet the storm drains at the south end of the path.</p> <p>I live at █ Chine and have CCed my neighbour who lives at █ Chine Dr. We have reported our drainage problem to the city departments, to Councillor Crawford and to Councillor Kandavel, but to date nothing has been done. Councillor Kandavel did suggest to us that the Scarborough Bluffs West Project might be an opportunity to remedy our storm water problem. This is our attempt to get everything into the public record in case our erosion problem gets worse.</p>	<p>The purpose of the Scarborough Bluffs West Project is to explore the enhancement and protection of sensitive shoreline and natural areas and opportunities for improved waterfront experience and access between the Eastern Beaches (Silver Birch Avenue) and Bluffer's Park along Lake Ontario. The project will consider opportunities to:</p> <ul style="list-style-type: none"> <li>• Improve how people access, move through, and experience the waterfront</li> <li>• Preserve and enhance the natural environment, including the cultural significance of the Bluffs</li> <li>• Minimize natural hazards and risks to public safety caused by erosion</li> </ul> <p>Individual street improvements where no trail is proposed are outside the scope of the project. However, we note that no Alternatives, or proposed trail alignments, have been developed at this time; they will be developed during the Environmental Assessment phase for the full Study Area and will include shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. Once developed, the public will have the opportunity to review and comment on the proposed Alternatives. In the interim, please consider <a href="#">contacting 311</a> to further discuss this request.</p>

We are writing to you to object to the proposed trail along the shore of Lake Ontario between Silverbirch Avenue and Bluffers Park, which will destroy a natural beach, a beloved off leash area and an iconic water treatment plant waterfront. These will be replaced by an elevated causeway and a road. Presently many Torontonians and many visitors come to enjoy the beach, have picnics, swim, walk their dogs, and take photographs against an appealing background all summer. The off leash area is used year round, even on cold or wet days.

Please preserve this beautiful and unique park.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's

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Comment Cont'd	<p>Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>Please note that nowhere in the Terms of Reference is there discussion of an elevated causeway or road being explored. The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>

I am now aware of a proposed multi use trail through balmy beach and the dog park extending all the way to Bluffers Park.

Hand you not already taken away most of our waterfront in the city and handed it over to developers for their benefit at the expense of residents and people who travel to the beach? The off leash dog park with access to the water is an integral part of the beaches community. I go to that area every Sunday and have made so many friends over the years and it is extraordinary to see how everyone and all the dogs are so happy.

Now you have decided we need another bike path. How many bike paths or lanes does this city need at the expense of others? And at a cost of \$150 million?

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Comments	Proponent's Response
<p>The environmental impact on that project would be enormous. While I realize bluffers park erosion needs to be addressed, I believe that should be dealt with first before you proceeds with this trail.</p>	<p>This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
<p>I am honestly so tired of seeing all our city treasures being taken away and repurposed into something developers want.</p> <p>You keep talking about a liveable city on one hand and then destroy what we already have with the other.</p> <p>Please reconsider this proposal or come up with something that does not destroy our waterfront any further.</p>	<p>A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p>

Comments	Proponent's Response
<p><b>1. Misaligned Priorities</b>  At a time when Toronto faces urgent crises in homelessness, addiction, and mental health—with major budget shortfalls across the city—it is difficult to justify the cost of a trail expansion project that provides no clear or urgent public benefit.</p>	<p>The Scarborough waterfront has been the subject of over five decades of planning, studies and analysis seeking to understand stressors on the ecosystem, public access issues, and the nature of public safety and property risks posed by shoreline erosion. There is no formal public access along the shoreline between R.C Harris Water Treatment Plant and Bluffer's Park (approximately 4.5 km) due to generally steep grades, risk to public safety caused by ongoing erosion of the Bluff face, private property, and restricted access associated with critical public infrastructure.</p> <p>As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.</p> <p>This increased demand for access to natural areas also puts pressure on both managed and unmanaged terrestrial areas that are already in limited supply. As a result, the Study Area has been impacted by past and on-going human use. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment but also causes public safety issues. This project will explore opportunities to formalize access and use to provide safe and equitable access along the waterfront, while managing public use through the existing sensitive shoreline and natural areas.</p>

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<p><b>2. Lack of Transparency and Consultation</b>  Many local residents and stakeholders were not meaningfully consulted or informed about this development. To date, there has been no publicly available data or research assessing the project's impact on neighbourhood traffic, noise, or parking.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>Studies and assessments that evaluate the impact of the Alternatives on local neighbourhoods will be undertaken during the Environmental Assessment. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

<p><b>3. Threat to a Cherished Community Space</b>  The trail would cut directly through a well-used and much-loved off-leash dog park and green space that serves as a vital community sanctuary. Its loss would be deeply felt by residents and non-residents alike, who depend on it for recreation, social connection, and mental well-being.</p> <p><b>4. Impact on the RC Harris Filtration Plant</b>  This historic landmark is not only an architectural treasure but also a heritage-protected site. Its surroundings should be preserved and not disrupted by construction, development or increased traffic flow associated with the trail extension.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input through three (3) rounds of public consultation.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland)trails, or a combination of both, and potential new and/or enhanced access points to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and</p>
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<p>We need an off-leash dog park which is the last of its clean dog parks please...</p> <p>Stop hard landscaping off leash dog parks....</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City’s Parks and Recreation team have recently updated</p>
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<p>I am writing to express my strong opposition to the proposed Scarborough Bluffs West multi-use trail extension through Balmy Beach towards RC Harris.</p> <p>This project threatens to permanently destroy one of our city's most beloved natural spaces. We stand to lose our cherished off-leash dog park and the sandy, natural shoreline that defines Balmy Beach. This area is not just a local treasure—it is a dynamic, natural landscape that deserves to be preserved in its existing form for future generations.</p> <p>Additionally, the projected cost of over \$150 million is an irresponsible burden on taxpayers for a project that many in the community neither want nor have been properly consulted about. This is especially concerning given that many residents who live near the beach and will be most directly impacted are only just now hearing about this proposal.</p> <p>The planned wide, year-round service road for vehicles such as garbage trucks and snowplows will dramatically change the character of the beach, introducing noise, traffic, and light where there is now peace and natural beauty. Once this development is built, the unique charm and ecological integrity of the area will be forever tarnished.</p> <p>I strongly urge the Ministry and the City of Toronto to pause this project and ensure thorough, meaningful community consultation—particularly with residents living near the beach. We need solutions that respect the need to prevent erosion while protecting the existing natural environment and recreational uses that make Balmy Beach so special.</p> <p>Please reconsider this project in its current form.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's</p>
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Comments	Proponent's Response
<p>I am writing to express my full support for the proposed Scarborough Bluffs West Revitalization Project. This is a transformative initiative that will deliver critical shoreline protection, enhance public access to Toronto's waterfront, and preserve the ecological integrity of one of our city's most iconic natural features.</p> <p>The Scarborough Bluffs are not only a geological wonder but also a cherished green space for residents and visitors alike. With the increasing threat of erosion and climate change-related impacts, it is essential to act with foresight and implement solutions that ensure long-term sustainability and safety. The integrated approach outlined in the revitalization plan—including erosion control, parkland enhancements, improved trail connectivity, and habitat restoration—is both thoughtful and necessary.</p> <p>I am particularly encouraged by the project's commitment to:</p> <ul style="list-style-type: none"> <li>• <b>Environmental stewardship</b> through shoreline stabilization and ecological restoration.</li> <li>• <b>Equitable access</b> with improved pathways, amenities, and connectivity between neighborhoods and waterfront parks.</li> <li>• <b>Public engagement</b> to ensure that local voices shape the design and implementation of these spaces.</li> </ul> <p>By investing in this infrastructure today, Toronto will not only preserve a beloved landscape but also promote active lifestyles, community wellbeing, and economic vitality through tourism and recreation.</p> <p>I urge the City to proceed with this important work and continue to engage the community throughout all phases of planning and implementation. Thank you for your vision and dedication to building a resilient and inclusive waterfront for future generations.</p>	<p>Thank you for your comments and support.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

I'm writing to share my concern about the proposed Scarborough Bluffs West Project and the plan to extend the multi-use trail through Balmy Beach.

This section of the Beaches is one of Toronto's last natural, sandy shorelines — it's a living, dynamic ecosystem that protects against erosion naturally and supports local wildlife. Hardscaping it with a wide, year-round road will permanently change its character and could actually increase erosion and storm vulnerability long-term.

This area is also a vital community space — it's where families, dog owners, and neighbours come together. Moving or losing the off-leash dog park and peaceful sandy area would impact community well-being and mental health.

I believe there are better alternatives that protect the Bluffs from erosion without paving over our beloved natural beach. I urge you to consider solutions that prioritize shoreline restoration and resilience while keeping this special place intact for generations to come.

Thank you for your time and for considering the community's voice on this.

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At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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I write this letter in response to the proposed \$150 M Scarborough Bluffs West Project to create a multi-use trail from Balmy Beach to Bluffers Park. As a resident at the private Co-operative building at [REDACTED], I am a concerned citizen and advocate for environmental preservation. This project will greatly affect the quality of life of all residents of Nursewood Rd and surrounding neighborhood with our already overloaded street traffic, noise and parking. We recently had to petition Brad Bradford (and succeeded) to change the parking times for our street to account for the tenfold increase in car traffic post covid as people prefer to park on our street, blocking North and Southbound traffic, making ambulance, firetruck and our own travels severely curtailed or impossible. I wholeheartedly reject this proposed extension.

This cherished natural shoreline under threat from artificial alterations, would irreversibly damage its ecological integrity, natural beauty, and cultural significance beside the RC Harris Building. Hardscaping poses serious risk to the natural dynamics of the beach ecosystem. It interferes with sand movement, accelerates erosion in adjacent areas, and disrupts the delicate habitats of native species, including shorebirds, vegetation, and aquatic life. Furthermore, such alterations limit public access and enjoyment of the natural shoreline while under construction.

Preserving this beach in its natural form is not just a matter of environmental responsibility, but also one of long-term sustainability. Nature-based solutions like native plantings, and soft shoreline stabilization are proven and cost-effective methods that align with climate adaptation goals and protect both infrastructure and ecosystems.

We implore you to please uncouple the southeast corner of the Beach from the Bluffs erosion project that would forever remove much enjoyment for all Beach residents and undermine our community values. It is a living, breathing ecosystem and our beloved public space.

Thank you for your time and for your continued commitment to protecting Ontario's natural heritage.

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No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

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At this time, nothing has been proposed at Balmy Beach/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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Comment Cont'd	<p>This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline including Balmy Beach. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p> <p>With respect to the impacts enhanced access may cause, Table 4-1 includes preliminary criteria and indicators that will be used to evaluate the future Alternatives and assess their potential for impacts to existing communities.</p>

<p>As Project Officer for the SBW project, you should be aware that this project will decimate the narrow natural sandy beaches which extend eastward from the foot of Silverbirch Ave in the south east corner of the Beach neighborhood.</p> <p>We do not want more hard-scaping of our beach. This trail/road extension will require many tons of lake fill to create land to build on. This trail/road would have to be elevated in order to not be washed away and will significantly diminish our access to the water for swimming, canoeing, etc.</p> <p>The sandy shoreline between Silverbirch and the RC Harris filtration plant, known as Balmy Beach, has for over 20 years been an off leash dog park, which is well utilized, successful and unique to the City Of Toronto.</p> <p>Saving the iconic bluffs from erosion needs to be separated from this road/trail extension.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City’s</p>
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Comments	Proponent's Response
Comment Cont'd	<p>Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>Please note that nowhere in the Terms of Reference 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 <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>

Comments	Proponent's Response
<p>Studies have shown that bringing more humans to our beloved Bluffs will only further destroy them and their unique terrestrial and aquatic animals, some of which are endangered or threatened.</p>	<p>As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>This increased demand for access to natural areas also puts pressure on both managed and unmanaged terrestrial areas that are already in limited supply. As a result, the Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment but also causes public safety issues.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats, including impacts on Species at Risk, will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
<p>Given the massive scale of this project, creating land in order to build a four season recreational Trail approximately 4.3 km in length, the authorities need to slow down and do the proper assessments and of course we should be considering costs given our taxpayer dollars will be used.</p> <p>There is certainly no reason that this project should be urgent, fast-tracked, or expedited, which are all words we've heard recently from one city counsellor.</p>	<p>This study is regulated under the Environmental Assessment Act, which follows regulated timelines and sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>The City of Toronto and Toronto and Region Conservation Authority are undertaking a Comprehensive Environmental Assessment, which involves two phases and includes significant technical and consultation work.</p> <p>It includes a full provincial government review of the Terms of Reference for approximately 6 months, and of the Environmental Assessment document for approximately 12 months. In total, Comprehensive Environmental Assessments typically take about five years to prepare and approve. As noted above, we are currently in the Terms of Reference phase.</p> <p>Following approval of the Environmental Assessment, the project would then advance through detailed design and permitting/approvals processes, prior to the start of any construction works.</p>

Comments	Proponent's Response
<p>The consultation process has been flawed. Those residents who will be the most affected by this project have been the least consulted.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach. It should be noted that outreach to engage residents has included: newspaper advertisements, social media, signage, newsletters and mail drops all within the local area.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p>There have been no studies looking at the impact that this trail/road will have on traffic, parking, noise, and overall affect on the local environment.</p>	<p>Studies and assessments that evaluate the impact of the Alternatives on local neighbourhoods and the environment will be undertaken during the Environmental Assessment. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>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.</p> <p>Acknowledging the community's concern regarding increased traffic and street parking, the project team will explore the feasibility of undertaking a study of transportation options during the Environmental Assessment, recognizing the limitations of that data.</p>
<p>Save the Bluffs without destroying our beloved sandy accessible successful Balmy Beach.</p>	<p>See response to Comment #1.</p>

Comments	Proponent's Response
<p>Please tell me this is a joke.</p> <p>A very expensive \$150m joke for a multi-use trail from Silver Birch to Bluffers Park, and shrouded in secrecy?</p> <p>SMH.</p> <p>There's so many things wrong with this.</p> <p>I have paid taxes all my life to hear this preposterous plan.</p> <p>I will fight tooth and nail.</p> <p>Please respond to say this is never going to happen.</p> <p>I seriously want to be involved here.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>As no Alternatives have been developed yet, construction costs have not been estimated. There is no reference to a cost of \$150 million in the Terms of Reference or any circulated project materials.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

<p>As a high school student who has lived in the beaches my whole life, I feel strongly against the continuation of the multi-use trail to the Bluffs. While the idea might seem good in theory, the environmental and financial costs far outweigh the benefits.</p> <p>One of my favourite things to do is take my dog down to the off leash area, and I know this is something that many local residents value. Adding construction to our area will only add disruption and hurt the fragile ecosystems that we are deeply connected with.</p> <p>I believe this money could be invested into something that brings environmental benefits, or in addressing other community issues that need attention. Honestly, I am disappointed to see a project moving forward that is out of step with what locals actually want.</p> <p>Please reconsider your decision and revoke this project. Our environment, our community and our future deserve better.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be developed and shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and</p>
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Comment Cont'd	<p>evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <u>City's Off-Leash Area strategy</u> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

I write this letter in response to the proposed \$150 M Scarborough Bluffs West Project to create a multi-use trail from Balmy Beach to Bluffers Park. As a resident at █ Nursewood Rd, I am a concerned citizen and advocate for environmental preservation. This project will greatly affect the quality of life of all residents of Nursewood Rd with our already overloaded street traffic, noise and parking. I wholeheartedly reject this proposed extension.

*This cherished natural shoreline under threat from artificial alterations, would irreversibly damage its ecological integrity, natural beauty, and cultural significance beside the RC Harris Building.*

*Hardscaping poses serious risk to the natural dynamics of the beach ecosystem. It interferes with sand movement, accelerates erosion in adjacent areas, and disrupts the delicate habitats of native species, including shorebirds, vegetation, and aquatic life. Furthermore, such alterations limit public access and enjoyment of the natural shoreline while under construction.*

*Preserving this beach in its natural form is not just a matter of environmental responsibility, but also one of long-term sustainability. Nature-based solutions like native plantings, and soft shoreline stabilization are proven and cost-effective methods that align with climate adaptation goals and protect both infrastructure and ecosystems.*

*We implore you to please uncouple the southeast corner of the Beach from the Bluffs erosion project that would forever remove much enjoyment for all Beach residents and undermine our community values. It is a living, breathing ecosystem and our beloved public space.*

*Thank you for your time and for your continued commitment to protecting Ontario's natural heritage.*

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<p>I am also a resident at [REDACTED] Nursewood Rd. In the beach. I agree with everything that [REDACTED] has said in the above letter. As well as the environmental impact, has no one considered the people who live along the proposed project? We will be subjected to years of building and construction noise which will only be added to the ongoing work at the R.C.Harris plant which has been going on for years and will continue to happen. Please consider what you are doing to the wildlife, the people and the planet!!!</p>	<p>This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline including Balmy Beach. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p> <p>With respect to the impacts enhanced access may cause, Table 4-1 includes preliminary criteria and indicators that will be used to evaluate the future Alternatives and assess their potential for impacts to existing communities.</p>

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Comments	Proponent's Response
<p>I live in the Beaches area. I've just been made aware of a big project that seems to be taking place and apparently there's only five days left until July 20th to have any public input? There's been no meetings no consultation nothing isn't this against some sort of law?</p>	<p>This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

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<p>I've been reading the comments as best I can to try and understand what they are planning to do and what impact it will have on our Beaches neighbourhood and the environment.</p> <p>We need some easy to understand plan to go to to vote on this and have our say surely.</p> <p>Thank you for your time and consideration.</p>	<p>See response to Comment #1.</p> <p>At this time, nothing has been proposed at Balmy Beach. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The public will have an opportunity to review, and provide comment on, the preliminary Alternatives developed, and the proposed criteria and indicators that will be used to evaluate them, during the first round of consultation of the Environmental Assessment stage. Alternatives will then be evaluated to assess the potential positive and negative effects on the environment, the neighbouring community and the broader community.</p>

I am interested to learn of the plans around the Balmy Beach section of the TRCA. While I am supportive/excited for the concept of extending multiuse trail, I was informed that the portion of the beach from silver birch to the Water Filtration Plant would be impacted: 'lose this portion of the beach' + lose access to this as an off leash area? This is a great area for beach residents (vs the touristy Woodbine area), a great blend of paddleboarders, off leash dogs, kite surfers, photographers etc.)

A couple of questions

1. Will the beach access be impacted in this section?
2. What will the path look like through this portion (currently there is a nice footpath which seems logical trace with a future state). I was made to believe the majority of the beach will now be replaced with hardscape/path?
3. Will residents be able to access the beach (from Munro Park – there are steps from Munro Park do the beach today)?
4. Why would the off leash part be considered – this particular park creates significant harmony in the neighborhood as it separates a dedicate section at the end of the beach from the main 'people' beach (Silver birch to Woodbine).
5. I was not able to locate the design – are you able to share?

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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). Where feasible, trails will be made accessible to all users. Trail widths and surface

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Comment Cont'd	<p>material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the City's Off-Leash Area strategy that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

Comments	Proponent's Response
<p><b>1. Misaligned Priorities</b>  At a time when Toronto faces urgent crises in homelessness, addiction, and mental health—with major budget shortfalls across the city—it is difficult to justify the cost of a trail expansion project that provides no clear or urgent public benefit.</p>	<p>The Scarborough waterfront has been the subject of over five decades of planning, studies and analysis seeking to understand stressors on the ecosystem, public access issues, and the nature of public safety and property risks posed by shoreline erosion. There is no formal public access along the shoreline between R.C Harris Water Treatment Plant and Bluffer's Park (approximately 4.5 km) due to generally steep grades, risk to public safety caused by ongoing erosion of the Bluff face, private property, and restricted access associated with critical public infrastructure.</p> <p>As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.</p> <p>This increased demand for access to natural areas also puts pressure on both managed and unmanaged terrestrial areas that are already in limited supply. As a result, the Study Area has been impacted by past and on-going human use. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment but also causes public safety issues. This project will explore opportunities to formalize access and use to provide safe and equitable access along the waterfront, while managing public use through the existing sensitive shoreline and natural areas.</p>

Comments	Proponent's Response
<p><b>2. Lack of Transparency and Consultation</b>  Many residents and stakeholders were not meaningfully consulted or informed about this development. To date, there has been no publicly available data or research assessing the project's impact on neighbourhood traffic, noise, or parking.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>Studies and assessments that evaluate the impact of the Alternatives on local neighbourhoods will be undertaken during the Environmental Assessment. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

<p><b>3. Threat to a Cherished Community Space</b>  The trail would cut directly through a well-used and much-loved off-leash dog park and green space that serves as a vital community sanctuary. Its loss would be deeply felt by residents and non-residents alike, who depend on it for recreation, social connection, and mental well-being.</p> <p><b>4. Impact on the RC Harris Filtration Plant</b>  This historic landmark is not only an architectural treasure but also a heritage-protected site. Its surroundings should be preserved and not disrupted by construction, development or increased traffic flow associated with the trail extension</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City’s</p>
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Comment Cont'd	<p>Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>The project team also acknowledges the significance of the R.C. Harris Filtration Plant and the need to ensure relevant architectural and heritage values are not compromised. However, it is also noted that the grounds are open to use by the community and there is a recognized need to provide better access across the site and to the beaches to the east, as people are unsafely accessing the beach over a locked gate and fence, showing the demand for waterfront access and recreation.</p>

I'm writing as a deeply concerned local resident, mom of two young kids, and lifelong lover of the Toronto Beaches. I've just learned about the proposed Scarborough Bluffs West Revitalization project and frankly, I'm stunned that such a destructive plan is even on the table.

Let me be clear: a 4-metre-wide road paved directly over our beach is not a "revitalization." It's an irreversible takeover of one of Toronto's most peaceful, natural, and beloved waterfronts and it would absolutely devastate the very things that make this neighborhood so special for families like mine.

We walk the beach daily. We let our dog run at Silver Birch. My kids play in the sand, chase birds, and learn to love nature here. And now you want to bury all that under concrete and lakefill? Come on.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's

Comments	Proponent's Response
	<p>Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>Please note that nowhere in the Terms of Reference 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 <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>
<p>Beyond the emotional and community impact, the project raises massive red flags:</p> <p>It would destroy habitat for bank swallows, a federally protected species</p>	<p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats, including impacts to Species at Risk, will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
It's charging ahead without a complete Environmental Assessment, which is not just reckless, it's unlawful	<p>The City of Toronto and Toronto and Region Conservation Authority are undertaking a Comprehensive Environmental Assessment, which involves two phases and includes significant technical and consultation work. We are currently completing Phase 1: the Terms of Reference, which sets out how the Environmental Assessment will be done. The Terms of Reference is currently undergoing a full government review.</p> <p>Phase 2, the Environmental Assessment, will commence upon approval of the Terms of Reference, anticipated in the first half of 2026.</p>
It violates the Provincial Policy Statement and Endangered Species Act	<p>This study is regulated under the Environmental Assessment Act, not the Planning Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>The Ministry of Environment, Conservation and Parks, who administers the Endangered Species Act, is the approval authority for the Comprehensive Environmental Assessment. The Environmental Assessment process also involves extensive review by all applicable regulatory agencies at both the provincial and federal level to ensure compliance with all applicable Acts and regulations.</p>

Comments	Proponent's Response
<p>It completely sidesteps meaningful Indigenous consultation</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of consultation and engagement, with the public, other key stakeholders, and Treaty Holders and Indigenous communities, since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach, while Section 6 details the consultation undertaken with Treaty Holders and Indigenous communities specifically.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. This will also include consultation with Treat Holders and Indigenous communities, agencies and other stakeholders. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p>

Comments	Proponent's Response
<p>NO, we don't need more traffic in this quiet haven</p>	<p>Studies and assessments that evaluate the impact of the Alternatives on local neighbourhoods will be undertaken during the Environmental Assessment. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>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.</p>
<p>This isn't about being anti-trail or anti-access. It's about protecting what's already working beautifully: a natural beach that supports wildlife, community, and peace. There are smarter, greener alternatives that don't involve paving over the shoreline.</p> <p>So here's my ask:      Pause this project. Deny the current Terms of Reference. Demand real environmental studies. Listen to Indigenous voices. And invest the money to make the existing areas of broken Toronto better, not uprooting an already perfect area, so leave our beach alone.</p> <p>We're not against improvements — but this? This is a massive mistake. And we won't stay quiet while it happens.</p>	<p>See responses to Comments #1 through #6.</p>

The Scarborough Bluffs need to be protected by not having a lot of human traffic therefore, I oppose opening up this area to the public any more than it already is.

This is a delicate environment for shore birds, butterflies, song birds and animals.

The Bluffs erosion is mostly from the numerous underground streams, thus the protection of the Bluffs also involves not putting a wall, that creates a dam, on Kingston Road, which is what will happen if all the proposed condos are approved by the City. I do hope that you are in contact with them about the control they have over this aspect of the Bluffs' protection.

The TCRA has been negligent and possibly legally noncompliant with the City's law against invasive plant species. The Doris McCarthy Trail has abundant Dog Strangling Weed and that Pampas Grass plant that is not protection nor food for our deer, rabbits, and amphibians especially. If these plant species are found on private property, there can be a fine. The City is doing a poor job of regulating invasive plant species.

Thank you for considering my comments in your project plans. I do hope you have personally visited the area to see the needs for yourself and I expect you and your team to fight for the protection of this beautiful area called The Bluffs.

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The project team is aware of the condo development proposals along Kingston Road. However, Section 5.1.3 of the Terms of Reference describes that the steepness of the Bluffs is the result of historical toe erosion caused by wave action from Lake Ontario. Groundwater contributes to on-going erosion but is not the primary cause.

Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize

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Comment Cont'd	<p>the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., invasive species removal, new fish habitat, wetlands, tree plantings, etc.). However, please be advised that Doris McCarthy Trail is outside of the Project Study Area and will be addressed through the adjacent Scarborough Waterfront Project.</p>

I have read the several emails sent to you by my neighbours in regard to the Scarborough Bluffs West Project and agree entirely with their concerns for the preservation of our amazing beach area which provides unique experiences for Toronto residents and important natural environments for animal and plant species. How often I have run into Torontonians and non-Torontonians who extol the virtues of this unique part of our city and how much they enjoy the times they have spent wandering from the Harris Water Treatment Plant along the beach to the boardwalk and on to Ashbridges Bay!

But I would like to put our concerns for this development project into a wider context. To say the least, our city has had a rather checkered past in regard to the protection of our natural environment, and the preservation of our history.

Over many decades, as development interests diminished politicians' concerns for our natural environment and for the preservation of our historical heritage, Toronto became a modern city with little regard for our historical architecture and unique situation on Lake Ontario. Today, one has great difficulty finding 19th Century (or earlier) architecture in the city, save for the area near St. Lawrence Market and on the campus of the University of Toronto. Think of the ongoing struggle to preserve Toronto's old city hall and the many struggles by developers to prevent the creation of virtually any pedestrian walkways in the heart of the city!

The promise of successive politicians to protect the lakefront in the downtown area of the city dissipated when the development money showed up. When driving along the Gardiner Expressway and looking south, one can only cringe at the quip "I think there is a lake down there"! Some of us who travel are amazed by other large North American cities' insistence on preserving their lakefronts' natural shorelines for their citizens enjoyment and relaxation. Chicago and Cleveland come to mind!

Please give Toronto the opportunity to finally become a city which genuinely appreciates its history, its unique natural environments and the genuine concerns of its citizens intent on preserving both!

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The project team acknowledges the significance of the R.C. Harris Water Treatment Plant and the need to ensure relevant architectural and heritage values are not compromised. However, it is also noted that the grounds are open to use by the community and

Comments	Proponent's Response
Comment Cont'd	<p>there is a recognized need to provide better access across the site and to the beaches to the east, as people are unsafely accessing the beach over a locked gate and fence, showing the demand for waterfront access and recreation.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p>

I am trying to find out what changes are planned along the beach from the RC Harris Filtration plant to Silver Birch. We walk our dogs there off-leash every day along with many others. Can you confirm that your project will not impact this activity?

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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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface

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Comment Cont'd	<p>material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

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<p>Are you going to collect ideas from the residents living in the very near area to find out their input on the project? What design considerations are being made and where can we input to these?</p> <p>I suggest that you come to the community and set up a tent and spend the day down at the beach right where you plan to make changes and talk to the people that use it every day - all the dog walkers will want to know what you have planned - I think your engagement should include opportunities for people who are there in person to give input that will be considered - all these virtual sessions are not very personal and we are all busy people. Please let us know when you are coming by advertising in the Beach Metro News and we will make sure we show up to find out more about this project and give our input before it's too late. We trust that you will plan this in time that our concerns will be heard and considered.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public engagement, with the public since the project commenced in 2023. This included an in-person pop-up event at R.C. Harris in May 2024. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, and the project team is exploring additional in-person pop-up event(s) along the waterfront, such as at Balmy Beach/Silver Birch Beach Dog Off-Leash Area.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p>Please come on a busy summer day and drive and try and find parking - you won't. It just keeps getting busier here in the summer and we don't have the transportation infrastructure to handle more traffic - would like to see your traffic study that will estimate the additional traffic and find out how you plan to mitigate for the additional vehicles in an already clogged neighbourhood. This study must consider and comment on how often TTC streetcars break down and cause delays. Often at the end of our street are streetcars broken down blocking a lane and if there are parked cars, there is no where to go except up into the neighbourhood to the north - how much additional traffic will we see in front of our house on Kingswood Road? Your traffic study should plan for contingency for broken down streetcars and you may need to collect data to determine how often this will happen once the project is complete and how much additional traffic it will cause.</p>	<p>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.</p> <p>Acknowledging the community's concern regarding increased traffic and street parking, the project team will explore the feasibility of undertaking a study of transportation options during the Environmental Assessment, recognizing the limitations of that data.</p>

I am writing to you to express my vehement objection to the subject project. However, I am in favour of addressing the erosion for the Scarborough Bluffs.

It has been stated that the cost to construct this project will be around \$150M dollars which everyone knows will actually double or triple in cost. Our city, province and country are in deep debt. We cannot continue to spend money we do not have on unnecessary projects. This money is much better spent on fixing our roads, transit, schools and hospitals which have been on a massive decline these past decades. Furthermore, you will be paving over a beautiful sandy beach between Silver Birch Ave to Nursewood Ave. That little stretch of beach is heaven to the community. Almost as many people have dogs than kids in this neighbourhood and taking that away would be cruel. There are a number of seniors who use that off leash dog area. If you take that area away, the closest one is at the foot of Lee Ave which is quite a distance if you have to walk. You will be taking something that thousands of people in the community use on a daily basis. For what? Please use the money to repair/build a much better transit system. Why pave over paradise (to quote Joni Mitchell) to build something that can only be used in good weather for 7 months a year. I see very few people using the bike path in winter. We are a cold country and it will only be getting colder with climate change.

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As no Alternatives have been developed yet, construction costs have not been estimated. There is no reference to a cost of \$150 million in the Terms of Reference or any circulated project materials.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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Comment Cont'd	<p>The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

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<p>What troubles me the most is the utter lack of REAL communication with the Beach community. Almost everyone I have spoken to is not aware of the scope of this project - they thought it was only to deal with the erosion for the bluffs. People making decisions for our community who do not live in the community, is unjust and unfair. We should get to have a community vote with transparent information provided. I was raised in the Beach and absolutely love it. Your decisions are changing this beautiful place where I grew up and have raised my children.</p> <p>I know this message will fall on deaf ears as you will proceed with whatever you choose to do. So much for community input.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

I have been following the Scarborough Bluffs West Project project for some time and have attended a number of your public meetings, stating our case on a number of occasions.

Once again I am stating my concerns about the proposed \$150 M Scarborough Bluffs West Project to create a multi-use trail from running through Balmy Beach and also the largely untouched area between The RC Harris Filtration Plant and Bluffers Park.

As a resident at ■ Nursewood Rd, I am a concerned citizen and advocate for environmental preservation. The affects of this project on the quality of life of all residents in the area, and those of Nursewood Rd, and the visitor's experience, with our already overloaded street traffic, noise and parking, are immeasurable.

While I am in favour of your ecological commitment I am opposed to, and do not support, the extension of the trail and hard landscaping, landfill, etc. and the massive changes that would make, to the historically significant Balmy Beach area as well as the shoreline between Balmy Beach and Bluffer's Park.

Our cherished shoreline, under threat already from the increased traffic and commercial dog walkers, would suffer further from artificial alterations, would irreversibly damage its ecological integrity, natural beauty, and cultural significance beside the RC Harris Building.

Preserving Balmy Beach in its current form is not just a matter of environmental responsibility, but also one of long-term sustainability. Nature-based solutions like native plantings, and soft shoreline stabilization, already in place, often enhanced by the public and private gardens that face the beach, are proven and cost-effective methods that align with climate adaptation goals and protect both infrastructure and ecosystems. Whereas the hardscaping would interrupt all of that.

Over recent years, we have witnessed the disappearance of many native shore birds, animals and other wildlife that have frequented Balmy

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<p>Beach. Replaced now by coyotes and rats, among other invaders. Encouraging further losses created by the potential of increased heavy traffic and loss of natural habitat seriously undermines your goals, in my opinion.</p> <p>We cannot underestimate our concern and, if nothing else, implore you to please uncouple Balmy Beach from the Bluffs erosion project, removing the threat of forever losing much enjoyment and the health of the natural environment for all beach users, and the undermining of our community values.</p> <p>It is a living, breathing ecosystem and our beloved public space.</p> <p>We recognize your commitment to protecting Ontario's natural heritage and thank you for your time in reconsidering this project.</p>	<p>The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p> <p>This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline including Balmy Beach. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p>It is with great concern that I wish to voice my serious concerns regarding the Scarborough Bluffs West Project due to the significant impact it will have on the Nursewood area and the surrounding Beach community.</p> <p>It is disconcerting that a small flyer with little or no proper information was placed in our mailbox and could easily have been overlooked.</p> <p>As a resident of Nursewood Road for over 20 years and a Beach resident for more than 30, I believe the significance of this project on the residents is substantial.</p> <p>The potential disruption to the environment, the disturbance to the beach area, the RC Harris plant, and our properties is worthy of a lengthy and collaborative discussion.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input. At this time, nothing has been proposed at Balmy Beach/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process. The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>

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<p>To date, we have not been consulted nor have we had the opportunity to address our concerns. Allowing a deadline of July 20th, when the flyer was received last week, is challenging as most people are on holidays and may have little or no time to do the due diligence in studying the project's impact and outcomes.</p> <p>I would appreciate the opportunity to discuss this further. I hope we can find a solution that benefits everyone involved. I look forward to your response.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>The City and Toronto and Region Conservation Authority released flyers the week of June 23 through Canada Post. The flyer you received just before July 20 was not sent from the project team.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

I write today out of concern for the Scarborough Bluffs West project. I understand and can agree with the need to stabilize the Bluffs area and have some reasonable development.

My concern is the project extends a bit out of scope.

The road around the RC Harris Water Treatment Plant and the plan for a road on Southeast corner of the beach next to it are very concerning. It will hardscape and reduce a now more natural area of beach and remove the highly used dog park.

Long term, I am concerned at the ongoing high costs of maintaining and stabilizing this portion.

In addition, I have spent time on the website and still have numerous questions as to what is exactly planned to happen and options.

I understand you have likely thought deeply on these matters, so it would be good to speak with you.

I look forward to further discussion and I hereby sign up before the July 20th deadline and make myself available to you and your committees

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Please note that nowhere in the Terms of Reference 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).

Comments	Proponent's Response
Comment Cont'd	<p>Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions. The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date. An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Myself and my wife purchased our Property at number █ Neville Park Blvd. in 2016. It is one of only 12 homes that front directly on the beach. The present boardwalk ends at Silverbirch where the Balmy Beach club and kayaking club Park end. I am at a loss as to why they cannot link up the trail at the bottom of Silverbirch by going across Queen Street and down to the bottom of Silverbirch. It seems to me that it would be far less costly to create a path alongside an already existing roadway than it would to incur huge expense for massive, landfill and construction between the bottom of the water works, and the bottom of Silverbirch. Not only will this new trail literally abut the backyards of this handful of homes, it would also destroy an incredible amount of peaceful nature filled waterfront beach that to this point remains almost completely untouched and is a popular dog park. Why is there not an alternative design other than the one that is being presented as far as the actual location of the trail?

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface

Comments	Proponent's Response
Comment Cont'd	<p>material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p>

### **Environmental Impact on a Sensitive Ecosystem**

The area is known for its erosion problems, and adding more foot traffic will likely worsen the situation. With the natural landscape being so fragile, it's hard to imagine how the City can ensure the safety of visitors while preventing further environmental degradation. I believe that any changes made should consider these safety risks more carefully before proceeding with the Environmental Assessment phase.

I am all in favour of equitable access to beautiful natural resources as a principle, however more access to an inaccessible bluff environment doesn't happen in a vacuum. How do people get there and where will they park? Will transit be improved to ameliorate the pressure for people to bring cars? Is access to be provided in certain strategic areas where there may already be available parking capacity and some initial safe access points to the bluffs, or is the idea to provide it throughout the area regardless of ecosystem, erosion factors and safety? None of that is clear to me from what I've read in the documents and it concerns me that there is apparently to be no traffic study until far later in the process as I understand it.

A key objective of the project is to minimize natural hazards and risks to public safety caused by erosion. As part of the Environmental Assessment, any 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. Top of bluff (tableland) trails will also be developed for evaluation, outside the erosion hazard area.

Protecting the sensitive natural areas of the Scarborough Bluffs is also one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize where possible the impact on adjacent neighbourhoods and residents.

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.

Comments	Proponent's Response
Comment Cont'd	Acknowledging the community's concern regarding increased traffic and street parking, the project team will explore the feasibility of undertaking a study of transportation options during the Environmental Assessment, recognizing the limitations of that data.
<p><b>Need for Ongoing Maintenance in a Remote Area</b></p> <p>Opening access to more remote areas of the bluff will require regular and committed maintenance from the City. I don't know what consideration are to the operational, fiscal and infrastructure costs needed to accomplish this fear. I live in the Queen/Woodbine area that is blessed with public areas like Woodbine Beach that are easily accessible, both by the public (vehicle parking is there, transit is available) and City staff. Yet each morning, especially after a weekend, the parks and beach area are littered with human hazards left by visitors despite the ready availability of garbage bins. From litter, to broken bottles, discarded drug paraphernalia, human feces, still smouldering fire pits, chicken bones and more, it is disheartening to see how these public resources are left in a state of degradation that pose hazards to wildlife, children, pets and people alike. City staff do their best to maintain cleanliness but it is a constant and ferocious battle. Imagine that situation happening on a trail at the foot of the bluffs where people could set up encampments, start fires, set off fireworks and who knows what else. The remote nature of the proposed trail could make maintenance even more difficult and costly.</p>	<p>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 Environmental Assessment.</p> <p>Maintenance and operational costs have been removed from the evaluation criteria and indicators shown in Table 4-1 as they cannot be predicted with much certainty and will not aid in the evaluation of Alternatives. Capital costs will be the focus of the evaluation of Alternatives.</p>

**Use of Taxpayer Resources**

I'm concerned about the financial implications of this project, which I know has been raised through public consultation many times. There is the cost of doing whatever it is that is being envisioned, plus the ongoing maintenance in perpetuity. Seriously, with so many immediate community needs—such as improving transit, tackling affordable housing, and enhancing social services—as a taxpayer in the City of Toronto, I think it is not equitable to priorities those more immediate needs and instead build something requires significant taxpayer money. Can you provide an estimate of what the full cost of this project might be, both for development and for ongoing maintenance? It would be helpful for the community to understand the long-term financial commitment required.

Estimates for this project cannot be made at this time as no Alternatives have been developed yet. Alternatives will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

The Scarborough waterfront has been the subject of over five decades of planning, studies and analysis seeking to understand stressors on the ecosystem, public access issues, and the nature of public safety and property risks posed by shoreline erosion. There is no formal public access along the shoreline between R.C Harris Water Treatment Plant and Bluffer's Park (approximately 4.5 km) due to generally steep grades, risk to public safety caused by ongoing erosion of the Bluff face, private property, and restricted access associated with critical public infrastructure.

As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.

This increased demand for access to natural areas also puts pressure on both managed and unmanaged terrestrial areas that are already in limited supply. As a result, the Study Area has been

<b>Comments</b>	<b>Proponent's Response</b>
Comment Cont'd	impacted by past and on-going human use. As noted above, people are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment but also causes public safety issues. This project will explore opportunities to formalize access and use to provide safe and equitable access along the waterfront, while managing public use through the existing sensitive shoreline and natural areas.

**Impact on Local Neighbourhoods and Amenities**

I worry that the new developments will transform the unique character of the local neighborhoods. The introduction of more traffic and formalized trails will alter the community's ambiance, and this change risks diminishing what residents love about living here and what visitors love about coming to be part of. I am very concerned about the impact on the existing shoreline in the area of Silver Birch and the off leash dog park. Dogs are very populous throughout the City and yet the spaces where they can roam free in off-leash areas are few and far between. The Kew Beach dog park is often where illegal bonfires are set up and I know of a few dogs who walked on what appeared to be an abandoned fire pit only to have their paws singed because someone didn't extinguish it properly. There have been people sleeping in there, leaving broken bottles and trash - and this is where we're allowed to let our dogs off leash. As a local pet owner, I am deeply concerned that the revitalization project will negatively impact the off-leash dog park at Silver Birch. This park offers a rare opportunity for dogs to access the water and enjoy the outdoors freely, benefiting both the animals and their owners. Losing this space would be a serious blow to the community.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

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At this time, nothing has been proposed at the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated

Comments	Proponent's Response
Comment Cont'd	<p>the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

Comments	Proponent's Response
<p><b>Insufficient Community Consultation</b></p> <p>I feel the consultation process for this project has been far too limited to truly represent the community. With notifications going out to only 16,000 residents, that's well below 1% of the current estimated population of Scarborough and East York. None of the neighbours in my area I have spoken to have heard about this directly. This feels like an incomplete effort to truly hear from everyone. The current consultation process has been inadequate, and it feels like a rush to push through the project. With such limited outreach and a timeline that conflicts with peak family schedules, many residents are being left out of the conversation. This project deserves a more thorough consultation period.</p>	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach. The 16,000 notifications includes all residents within the full Project Study Area, as well as residents located within several blocks to the north, east and west of the Study Area. As this is a localized project, notifications are sent to those most likely to be affected or interested. They would not be circulated through all of Scarborough or East York. In addition, there were notifications to the project mailing list which anyone can join, through social media, and through newspaper advertisements.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

I am a lifelong resident of the Scarborough Bluffs area, growing up in Scarborough Village, and raising my children in the Cliffcrest area. I have resided on Scarborough Hts. Blvd since 1986. I have explored the top of the cliffs, and the shoreline of the Scarborough Bluffs since I was a child, and have witnessed the many changes both from shoreline and ground water erosion, and massive man made projects altering the shoreline and the cliff face significantly.

I have witnessed the building of Bluffers Park in the 1970's on an existing land fill, which was a massive infill project built out into the lake so the beach that exists there now was formed. This beach did not exist until the 1980's. The building of Bluffers Park likely starved the western beaches, Woodbine Beach, and the Islands of vital sand, as the drift is westward on the north side of the Lake. However, we will never know this as in my experience the cumulative effects of these massive projects are not studied either before or after completion. As well, it is not known if the cumulative effect of the massive Bluffers Park infill project was considered at that time, prior to construction.

Once Bluffers Park was built the Floating Homes and Marinas came with it in the early 1980's and people began living there in floating homes and house boats. Unfortunately, there was a massive slope failure of this prior landfill on Brimley Road South, blocking access into and out of Bluffers Park in the late 1980's for several months. The slide involved the exposure of toxic land fill materials, and the clean up was extensive and took weeks. Trees were planted to stabilize the slope, but the stability of the west slope of Brimley Road remains as a potential hazard, and again it is known if its stability is being monitored on an ongoing basis. Again, this slope is landfill!

I have watched as the Bellamy Ravine (Gates Gully) was turned into the Doris McCarthy Trail by a massive construction project to shore up the slope sides , protect private property, channel storm water runoff into the lake, and pave the trail in the early 2000's. I have seen this trail be closed for approximately 3 years from 2012 – 2015 due to a slope failure necessitating a further costly construction project to repair it. It is not

The historical shoreline erosion protection projects you reference, between Meadowcliffe to the Guild, were subject to the completion and approval of multiple Class Environmental Assessments, or were granted a specific exemption under the Environmental Assessment Act. For more information about these projects, please contact Toronto and Region Conservation Authority at [info@trca.ca](mailto:info@trca.ca).

With respect to the on-going bluff erosion, Section 5.1.3 of the Terms of Reference describes that the steepness of the Bluffs is the result of historical toe erosion caused by wave action from Lake Ontario. Groundwater contributes to on-going erosion but is not the primary cause. Once the primary source of erosion is halted (toe erosion caused by wave action), erosion will continue until the stable slope is reached. This process can take in the order of decades, as also described in Section 5.1.3.

<p>known what role massive infill builds involving numerous mature trees to be removed played in this erosion.</p> <p>As the EA for the SWP Archeological Study confirms, these two massive projects along the Doris McCarthy Trail destroyed important archeological sites of both pre and post colonial peoples. The Scarborough Bluffs is one of the last remaining shorelines of Lake Iroquois and life dates back over 10,000 years. Again, I do not believe an EA was conducted prior to these massive disruptive projects. The stability of the slope of the Doris McCarthy Trail remains in question, and recently a massive condo project has been approved 50 metres from the ravine, which should be helpful in enhancing erosion. The TRCA would not even review or weigh in on this project, even though they were asked, and had studied the very site of the condo during the SWP EA.</p> <p>I have witnessed massive and costly shore erosion projects led by the TRCA, and funded by the taxpayers to protect expensive homes which likely should not have been built in the first place. The TRCA conducted a massive shoreline erosion project from just west of the Doris McCarthy Trail to Guildwood Gardens to protect homes along Guildwood Parkway and Meadowcliffe Drive from approximately 2011 - 2014. It is estimated that this project cost approximately 4 million dollars, and involved massive amounts of landfill and building a construction road along the shoreline. There was no environmental assessment conducted prior to this massive construction project along the Lake Ontario Shoreline, and Scarborough Bluffs which are designated Natural Heritage Systems, ANSI'S, and ESA's. In my view, an Environmental Assessment should have been conducted before this road was build in accordance with The City of Toronto Official Plan, Chapter 3.4, and Provincial EA Regulations.</p> <p>Despite all of this, the Bluffs continue to erode, and all of the construction, development, and human activity are enhancing this erosion. The Bluffs are eroding not only due to lake action, but also due to ground water from the numerous underground streams that have been buried by human development. The TRCA should be and is well aware of the many ravines,</p>	<p>Response Cont'd</p>
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Comments	Proponent's Response
<p>streams, rivers, and underground water system within their catchment area.</p> <p>I have also seen the trail that runs east of Highland Creek to the Rouge Park be closed for two years from 2021 – 2023 due to the trail being wiped out by Lake Ontario. I hope you appreciate this pattern that I am illustrating; humans consistently attempting to alter natural environments through expensive projects, only to have nature destroy them. It is important for the TRCA to finally understand that humans cannot control Mother Nature, and should be working with it, and not trying to alter it.</p> <p>A U of T Professor Dr. A.P. Coleman studied the Bluffs and recommended that a wide verge be left undeveloped at the top of the cliffs to allow for 200 years erosion, at a rate of .71 metres per year. Of course, this advice was ignored and the Developers came in the 1940's and continued eastward. I provide you the links to Dr. Hodges and Dr. Eyles more recent assessments of the risks and cause of erosion. As you will see, ground water altered by development is a major one.</p>	Response Cont'd
<p><a href="https://storymaps.arcgis.com/stories/0945fa57552147cab48acf9568427d2a">https://storymaps.arcgis.com/stories/0945fa57552147cab48acf9568427d2a</a></p> <p><a href="https://www.erudit.org/en/journals/geocan/1985-v12-n3-geocan_12_3/geocan12_3art01.pdf">https://www.erudit.org/en/journals/geocan/1985-v12-n3-geocan_12_3/geocan12_3art01.pdf</a></p>	
<p>As a result of my long history and personal knowledge of the Scarborough Bluffs, I became a member of the Stakeholders Committee for the Scarborough Waterfront Trail in 2014. My main reason for joining this committee, and volunteering my time for 4.5 years, was to protect the natural environment of the Scarborough Shoreline, and the many species of flora and fauna that reside there, including birds and aquatic life, and the history of the area. My very first question to the TRCA was why are they doing an EA now, when they already had built the construction road for shore erosion? Shouldn't one have been done before the construction road was built? This question was never answered.</p>	<p>The intent of the original access was the construction and maintenance of the shoreline erosion protection works, which are now informally used by the public. A new Individual Environmental Assessment process was initiated for the Scarborough Waterfront Project, decades after the construction road was built, to holistically address the issues of limited access, public safety, erosion, and degradation of the natural environment along the shoreline between Bluffer's Park and East Point Park.</p>

Comments	Proponent's Response
<p>My second question was why are they studying just the East portion from Bluffers Park to East Point Park (11 km), why not the entire Bluffs area which is 15 km. total? Again this question was never answered and I have since learned that this is not allowed in large projects, and EA should never be split, as it fails to consider the cumulative effects of existing, or proposed projects. As well, from a strictly financial perspective it would have been far less expensive to study the entire shoreline. The East portion was approximately 6 million, and the West is approximately 3 million.</p>	<p>The Scarborough Bluffs West Study is a separate Comprehensive Environmental Assessment process from the previously approved Scarborough Waterfront Project. These projects are differentiated due to the complexity of and variability in the shoreline and community conditions between two project Study Areas. Cumulative effects of the Preferred Alternative were assessed as part of the Scarborough Waterfront Project Environmental Assessment. The same will be done for the Scarborough Bluffs West Project during the Environmental Assessment.</p>

Comments	Proponent's Response
<p>My concerns at the time, were that if the SWP Trail was built, it would spur development along Kingston Road. My concerns came true. Immediately after the EA was submitted to the Province for approval, the Developers came. The very first proposal was the Windy Ridge Condo, 50 metres from the Bellamy Ravine and Doris McCarthy Trail. The TRCA studied this very land, and as I previously noted would not become involved, or review it. The water table in this area is only 9 feet! There are now 15 condos proposed along Kingston Road from Brimley to Markham Roads, all of which advertise being close to Scarborough Bluffs, will market lake views, and will not be affordable.</p> <p>As well, developers also came to tear down existing, affordable family homes and build massive homes with deep basements, disrupting ground water and enhancing erosion. The water tables are high, there are numerous underground streams draining into the Bluffs, and they necessitate sump pumps running 24 hours per day. Despite the fact that many of these homes are adjacent to the Cliff Face, or Ravine slope, the TRCA permits these builds. I have several pictures of blow holes in the side of the bluffs along Meadowcliffe drive beside large new builds. The TRCA recently approved a build 2.5 metres from the stable slope of the Doris McCarthy Trail on Pine Ridge Drive. The taxpayers should be paying for a slope stabilization project soon after that build is completed.</p>	<p>Toronto and Region Conservation Authority does not have the authority to review and comment on development proposals outside of their regulation limit under the Conservation Authorities Act.</p> <p>The presence of a trail supports community needs, but does not direct where development goes. The City's Official Plan and City-approved planning documents, including the Avenue segment studies, guide growth and development in the City of Toronto.</p>
<p>I then joined the Community Advisory Group (a new name) for the Scarborough Bluffs West Revitalization Study. I poised similar questions, which were again not answered. I also asked additional questions, such as; why are you studying the west side, when the east side construction has not even started despite having the EA approved by the province in 2019? I also asked will new studies of the East side be done, noting they are almost 10 years old now and out of date? I have not received answers to these questions.</p>	<p>There is no record of this individual's participation on the Community Advisory Group for the Scarborough Bluffs West Project Terms of Reference phase.</p>

Comments	Proponent's Response
<p>A 2012 Biological and Terrestrial Inventory conducted by the TRCA of the Scarborough Shoreline confirmed that it has more varied species of flora and fauna than any other area in Ontario, even rural areas, many of which are at risk. This study recommends limiting human activity in this area to preserve this natural environment. There is a similar 2017 Study of the West Side which our Stakeholders Committee did not know about, has not been released to the public, and apparently is still in draft form. Where is this study?</p>	<p>The inventory undertaken in 2017 was specific to the Scarborough Bluffs West Project Study Area.</p> <p>It is incorrect to suggest that the Scarborough shoreline has more varied species of flora and fauna than any other area in Ontario.</p> <p>The report has been made public and is available both on the project website as well as in the Terms of Reference (see link to the report in Section 8 – References and Works Cited). The results are summarized in Section 5.2.</p>

Comments	Proponent's Response
<p>I feel that the City and TRCA, with the assistance and oversight of U of T should conduct a comprehensive study on the effects of this massive infill and condo development on the erosion of the Scarborough Bluffs, the disruption of one of the last remaining urban wildlife corridors, and the effects these tall condos will have on this important North American Migratory Bird Route.</p> <p>A moratorium on development in this ecologically sensitive area should be enacted until this study is completed. The Bluffs should be preserved and not exploited. It has great value historically, geologically, environmentally, and ecologically. The Scarborough Bluffs and shoreline should be valued, studied, preserved, and purported as a Unesco World Heritage site. In my opinion, this would be a better use of the TRCA time and taxpayers resources, then trying to construct a trail where it is not possible, practical, or environmentally sound to do so.</p> <p>Having been on both Community Groups dating back to 2014, and being a lifelong resident, I have the following questions for the TRCA:</p> <p>Questions for the TRCA</p> <p>As a member of the SWP Stakeholder Committee East Portion from 2014 – 2018 and currently on the Community Advisory Group for the West, I have the following questions I would like to ask the TRCA:</p>	<p>Toronto and Region Conservation Authority conducts long-term bluff erosion monitoring through their Bluffs Recession Monitoring Program. This program monitors erosion specifically on private properties or adjacent to private properties. Toronto and Region Conservation Authority additionally collects annual LiDAR data along the Bluffs between the R.C. Harris Water Treatment Plant and Highland Creek to track long-term changes due to erosion.</p>
<p>1. Why was the East and West portion of the Scarborough Waterfront Project separated into two parts when conducting the Terms of Reference and Environmental Assessment for the entire 15 km length of the proposed Waterfront Trail? At the time the SWP was first announced in 2014 and the Stakeholders Committee formed, the TRCA was asked this question by this Committee and did not really present a rational answer. They only stated that in future they would be studying the Western portion from Bluffers Park to the Harris Filtration Plant. The Bluffs do not end at Bluffers Park, and the entire 15 km should have been studied at that time, why was it piecemealed?</p>	<p>See response to Comment #3.</p>

Comments	Proponent's Response
<p>2. It is our understanding that the TRCA spent \$6 million on the East studies conducted from 2015 - 2017. The West Portion will be approximately \$3 million. Would it not have been more cost effective for the Taxpayer to study the entire Bluffs and Scarborough Waterfront at the same time? Why was this project split?</p>	<p>See response to Comment #3.</p>
<p>3. Is it not true that when the TRCA brought forth the proposal for SWP in 2014 they had already spent over \$6.5 million between 2011- 2013 on a shoreline erosion project in the Central Portion of the East SWP, which created a construction road from the Doris McCarthy trail to Guildwood? The road was built and the shore erosion project was initiated to protect properties along Meadowcliffe Drive and Guildwood Parkway. This construction was done and the project completed with NO Environmental Assessment conducted, and forms the footprint for the East SWP.</p>	<p>See response to Comment #1. Class Environmental Assessments were completed.</p> <p>On-going ecological monitoring demonstrates long-term improvements to this stretch of shoreline.</p> <p>For more information regarding these projects, please contact the Toronto and Region Conservation Authority at <a href="mailto:info@trca.ca">info@trca.ca</a>.</p>
<p>Was this in violation of Provincial and Municipal Legislation and the Official Plan Section 3.4? The BLUFFS is an ANSI, ESA, and Natural Heritage System. The construction of this road and other significant erosion projects conducted by the TRCA on the Doris McCarthy trail during this period did adversely affect snakes and turtles burying their nests. Again, no EA was done prior to this construction taking place. Did the TRCA study the effects of this massive construction project along the shoreline prior to starting it in 2011? Should an EA have been completed prior to this massive erosion control project?</p>	
<p>4. We have now learned that when the studies were being undertaken for the East portion, the TRCA in fact conducted a 2017 Terrestrial and Biological Inventory of the west portion, but did not inform the Stakeholder Committee this was being done. The TRCA has not made this study public, and has advised that it remains in Draft form and cannot be released. Where this study and what were it's findings? How can it remain in draft form for 8 years? Why is it a secret?</p>	<p>See response to Comment #6.</p>

Comments	Proponent's Response
<p>5. The TRCA did make public the 2012 Scarborough Shoreline Terrestrial Biological Inventory Assessment covering the entire area from Lake Ontario shoreline to Kingston Road/Lawrence Ave. and from Midland Ave. to East Point Park. This detailed inventory confirms the presence of many at-risk species of flora and fauna, with greater diversity of aquatic and land species than any area in Ontario. Endangered bat and bird species use the cliffs as nesting areas, and it is a North American Migratory Bird Route. This study also recommended that the area along the Scarborough Bluffs/Lake Ontario Shoreline be restricted from human activity as much as possible. This report was much discussed during the Stakeholders Committee, the majority of which supported the "do nothing" alternative and referenced this report in support of this position. Why is the TRCA ignoring this report?</p>	<p>This report is being used as a reference. It is referenced in the Scarborough Bluffs West Project Terms of Reference. See Section 2.5 and Section 8.</p>
<p>6. Noting that the 2012 and 2017 Studies together cover the entire Scarborough Waterfront and Bluffs, why is the 2017 report still in draft form? When will it be released to the public?</p>	<p>See response to Comment #6.</p>
<p>7. In considering this project, there is an obvious cumulative effect (the entire 15 km of the Bluffs). Will the East Side Studies be referenced when studying the West Side? Previous studies confirm that the construction of Bluffers Park has "starved" the western Scarborough shoreline beaches of sand, and likely this extends to the Beaches and Island. You cannot separate this project. How will the SWP affect sand accumulation on the west Scarborough shoreline, Woodbine Beach, the Toronto Islands etc.?</p>	<p>Littoral sediment transport is described in Section 5.1.11 of the Terms of Reference, and will be further described in the Environmental Assessment document. Specific reference to the planned shoreline changes as a result of the Scarborough Waterfront Project are currently referenced in this section.</p>
<p>8. It is my understanding that when conducting an EA, you must consider the foreseeable cumulative effects. As noted above the SWP was divided into two, the East side SWP studies do not even consider the cumulative effect on the proposed West side. As well, the cumulative effects on other projects on the shoreline of Lake Ontario were not considered (Ontario Place development and loss of trees and shoreline, redevelopment of the mouth of the Don River, Leslie St Spit, the Toronto Islands etc.) It is well known that along the North shore of Lake Ontario the drift flows west, the Scarborough Bluffs formed the beaches, islands etc. Why did the TRCA not consider this when conducting their TOR and EA of the East Side and now the West Side?</p>	<p>A cumulative effects assessment of the Preferred Alternative is undertaken as part of the Environmental Assessment. This was done for the Scarborough Waterfront Project, and will be done for the Scarborough Bluffs West Project.</p>

Comments	Proponent's Response
<p>9. The EA for the East SWP was approved by the Province in 2019, and no construction has begun, and funding is not known 6 years after approval. Noting that the East SWP studies were conducted between 2015 - 2018, and are almost 10 years old, will new studies be conducted prior to any construction beginning? Some of the studies note that they are Stage 1 and that Stage 2 studies are needed prior to construction. Have they been done? If not, when are they planned?</p>	<p>Construction for the Scarborough Waterfront Project is scheduled to commence this Fall 2025, starting with the Brimley Road South Multi-Use Trail, followed by the West Segment shoreline and multi-use trail. For more information on the Scarborough Waterfront Project, please visit the <a href="#">project website</a>.</p>
<p>10. What is the TRCA'S plan for implementation and construction of the entire Scarborough Waterfront Project moving forward? Since the East has not begun construction, are you waiting on approval for the West section to begin the entire project? Will you still be constructing the East side from Bluffers Park east to East Point Park first, or are you considering starting on the West side?</p>	<p>See response to Comment #16. Detailed design of the Scarborough Waterfront Project Central Segment is anticipated to commence after the start of the West Segment shoreline and multi-use construction. For more information on the Scarborough Waterfront Project, please visit the <a href="#">project website</a>.</p>
<p>11. Isn't the TRCA's mandate to conserve our valuable, irreplaceable natural spaces? Why is the TRCA not interested in protecting the Bluffs? Your efforts could be better spent finding ways to preserve and protect this area instead of aiding in its commercial exploitation. The TRCA should be well aware that once the SWP EA went in for Provincial approvals the Developers came. Why did the TRCA not consider the cumulative effect the SWP would have in attracting developers to this environmentally sensitive area?</p>	<p>Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible. As part of the Environmental Assessment process, terrestrial and aquatic impacts will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
12. Noting that the TRCA has spent untold millions of dollars studying this area, why are these studies ignored by City Planning when considering development within the SWP study area? This area is an environmentally significant, fragile area with very high water tables and ongoing erosion issues. The highly treed residential areas adjacent to the Bluffs play an important role in supporting bird migration and local wildlife, as confirmed in your studies. The trees also play an important role in absorbing the many underground streams in the area helping to slow the inevitable erosion.	It is unclear what studies are being referenced. A number of studies conducted by the Toronto and Region Conservation Authority are considered as part of this project. See Table 2-1 and Section 8 of the Terms of Reference.
13. The Bluffs are of great ecological, geological, archaeological, historical, and environmental importance. It is also considered one of the most important coastal erosion issues in Canada, noting the public and private property as risk. Why is the TRCA not championing the protection of the Bluffs instead of ignoring its own studies and turning it into a paved trail? They would be better served lobbying for it to become an Unesco World Heritage Site, but that would involve actual conservation efforts.	See response to comment #18
14. I am constantly alarmed by the infill developments allowed on TRCA regulated land along the ravines and cliffs of the Bluffs. One large infill project was allowed by the TRCA recently less than 3 meters from the stable slope of the Doris McCarthy trail. As well, even after repeated requests, the TRCA refused to weigh in on a huge condominium development 50 meters from the stable slope of the Doris McCarthy Trail/Bellamy Ravine on land they had studied for the SWP, and had spent millions of taxpayer dollars on erosion and water construction projects. No one has studied the effects and long term impacts of this massive project right in the middle of a migratory bird route, wildlife corridor, and erosion prone fragile area. The water table is 9 feet from the surface and drains down the Bluffs. . Why did they not review this project?	See response to Comment #4.

Comments	Proponent's Response
<p>15. Noting the massive influx of development in this area in the past 10 years since the inception of the SWP, will the TRCA and City commit to a halt of all development (large infill with deep basements and condominiums on Kingston Road and Windy Ridge) in this area until a comprehensive independent study is conducted to assess the impacts of this massive development on the erosion of the Bluffs? It was recommended in 1912 by Professor A. P. Coleman, U OF T that a wide verge is left undeveloped to accommodate 200 years of erosion at a rate of 0.71 meters per year. Many published studies document the adverse effects of development on the erosion of the Bluffs. Why does the TRCA ignore these and their own studies?</p> <p><a href="https://www.erudit.org/fr/revues/geocan/1985-v12-n3-geocan_12_3/geocan12_3art01.pdf">https://www.erudit.org/fr/revues/geocan/1985-v12-n3-geocan_12_3/geocan12_3art01.pdf</a></p>	<p>Neither the City of Toronto nor the Toronto and Region Conservation Authority have the authority to halt these developments and enforce that a study be undertaken.</p> <p>Please also see response to Comment #7.</p>
<p>16. Is the TRCA and/or the City Parks and Forestry monitoring the erosion of the Bluffs? This year there have been several slides in our area, two at the bottom of Cudia Park which I have pictures of (March 11 and April 1). They are located at the very east side of Bluffers Park beach where people regularly walk. One slide pushed a mid size tree upright into the lake with about 6 feet of clay. The lake is now high in that area and the tree is covered by the water which is now up against the cliff. This poses a major public safety issue.</p>	<p>See response to Comment #7. While the Cudia Park Bluffs are not included as part of the Bluffs Recession Monitoring Program due to no immediately adjacent private property, Toronto and Region Conservation Authority does additionally collect annual LiDAR data along the Bluffs, including the section adjacent to Cudia Park, to track long-term changes due to erosion.</p> <p>The safety implications of the actively eroding Cudia Park Bluffs were thoroughly assessed as part of the Scarborough Waterfront Project Environmental Assessment and the Preferred Alternative for that project took this into consideration.</p> <p>The Cudia Park Bluffs are separate from the Scarborough Bluffs West Project and will not be further assessed as part of this project.</p>

Comments	Proponent's Response
<p>I'm reaching out to express support for the Scarborough Bluffs West Revitalization Project and to highlight how critical this initiative is—not just for environmental stewardship, but for active transportation and public access in the east end of the city.</p> <p>For far too long, Toronto has struggled to deliver safe, connected cycling infrastructure, especially in Scarborough. Major streets are often too congested or politically fraught to support proper bike lanes, and as a result, many residents are left without viable or safe options for getting around without a car.</p> <p>This project offers a rare opportunity to change that. A continuous, off-street multi-use trail along the waterfront would be transformative—offering cyclists and pedestrians a protected route with no impact on existing roadways. It would link communities, improve safety, reduce reliance on vehicles, and encourage healthier, more sustainable movement through the city.</p> <p>It's frustrating to see opposition to this trail from people who also object to bike infrastructure on city streets. At some point, we have to recognize that the demand is there and that failing to act just pushes people into unsafe situations or discourages active transportation entirely.</p> <p>I also appreciate the project's commitment to balancing access with environmental care. There's clearly a strong public desire to protect the shoreline's natural beauty while also making it more welcoming and accessible to a wider range of users—including people with disabilities, seniors, and families.</p> <p>I hope City staff and Council recognize the long-term value of this work and prioritize seeing it through. The Bluffs are an incredible public asset, and this project has the potential to enhance them for generations to come.</p>	<p>Thank you for your comments and support.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process as the project moves forward.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

My wife and I have been Beaches' residents for over 40 years, 34 years in the far east near the historic R.C. Harris Water Treatment Plant.

Since this project was announced we have been mystified, confused and concerned.

We enjoy the dog off-leash area east of the boardwalk since we moved to the area in the 1980's. We've met hundreds of people there and enjoyed thousands of hours watching our dogs exercise. We brag about it to friends in other cities. It would be crazy to destroy it for a poorly thought-out development that no-one asked for.

The R. C. Harris Water Treatment Plant has more stature and history than most people are aware. Significant history aside it provides 30-40% of fresh drinking water to the city. The entire city! A policeman friend told me it is the number one terrorist target in the City of Toronto. Are planners aware of this? Do we really want to increase its access to the public? Did anyone think this through?

When I see the monumental increases in my municipal property taxes I really have to wonder if projects like this should have ever been born.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface

Comment Cont'd

material can vary depending on the need, desire, and site conditions.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the [City's Off-Leash Area strategy](#) that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.

The project team also acknowledges the significance of the R.C. Harris Water Treatment Plant and the need to ensure relevant architectural and heritage values are not compromised. However, it is also noted that the grounds are open to use by the community and there is a recognized need to provide better access across the site and to the beaches to the east, as people are unsafely accessing the beach over a locked gate and fence, showing the demand for waterfront access and recreation.

We can also confirm that this project includes consultation at key project milestones with a Technical Advisory Committee. This committee includes wider representation from both the City of Toronto and Toronto and Region Conservation Authority, and engages staff from both City Planning and Toronto Police Services.

I'm writing as a resident of the Toronto Beaches, as a cold plunger and as someone who has spent decades in close relationship with the shoreline of Lake Ontario. I want to thank you for your work in stewarding the environmental review process, and I offer these reflections with respect, care, and concern for the proposed Scarborough Bluffs West Revitalization Project.

My concern is simple: **that in our desire to protect and enhance access to the shoreline, we may inadvertently compromise the very relationships and ecologies that make it precious.**

In the words of Rachel Carson, (American Marine Biologist) whose work continues to shape environmental thought around the world:

*“The more clearly we can focus our attention on the wonders and realities of the universe about us, the less taste we shall have for destruction.”*

Carson's wisdom reminds us that environmental management must be grounded not only in technical data but in a sense of **attunement, restraint, and humility**. As we extend trail systems and improve access, we must also ask:

- What already exists in this space that we risk displacing?
- What non-human species and ecosystems may be disrupted by increased human activity, paving, and shoreline development?
- How do we weigh the quieter forms of stewardship, off-leash beach communities, cold-water plungers, multilingual families gathering on the sand... that may not show up in formal stakeholder meetings, but whose relationship with the lake is deep and ongoing?

From my years of living by the water, I know that **Lake Ontario is not just a feature of the landscape... it is a teacher**. In times of great ecological uncertainty, it is essential that revitalization efforts do not mistake infrastructure for connection.

I respectfully request that the Ministry encourage the City and the TRCA to:

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The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process, with the cumulative effects of the selected Preferred Alternative assessed as part of the Environmental Assessment.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface

Comments	Proponent's Response
<p>1. <b>Prioritize minimal intervention</b> along ecologically sensitive shoreline zones, especially near Silver Birch, the RC Harris Water Treatment Plant and the Scarborough Bluffs.</p> <p>2. <b>Ensure thorough cumulative impact assessments</b>, not only regarding erosion and habitat fragmentation, but also cultural and community use patterns.</p> <p>3. <b>Explore alternative, non-paved solutions</b> that protect informal, accessible, and ecologically sound beach access.</p> <p>4. <b>Make space for more-than-human consultation</b> ... considering wildlife corridors, migratory species, and the hydrological rhythms of the lake as participants in the design process.</p> <p>In short: <b>can we revitalize without overriding? Can we steward without controlling? Can we listen, as Rachel Carson once did, not just with instruments and surveys .. but with reverence?</b></p> <p>I appreciate your time and your commitment to environmental protection. I offer this letter as a gesture of care, or the shoreline, for future generations, and for the possibility of a slower, wiser form of development.</p>	<p>material can vary depending on the need, desire, and site conditions.</p> <p>Five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, and the project team is exploring additional methods of outreach beyond larger formal stakeholder meetings to reach a wider audience.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them. Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, impacts to terrestrial and aquatic habitats will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

The main comment that I have regarding this project is related to the Silver Birch dog off-leash area. This is a very special part of the eastern beaches that allows our furry friends to run, and play, and swim. Many residents in the beaches area own dogs and use this beach on a daily basis. I have been coming to this beach with the various dogs I have owned over the past 25 years and I would really hate for this aspect of my community to be impacted by this project. This part of the beach has been designated as off leash and I would hope that with your new Strategy noted below that this area will continue to be designated as such using the case by case approach.

If different routing for Martin Goodman Trail is being explored I would just ask that you consider routing bike trails around this portion of the beach.

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At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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Comments	Proponent's Response
Comment Cont'd	<p>material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p>

I wish to inform you of my serious concerns about the proposed Scarborough Bluffs West Project:

While I agree that the Bluffs need to be protected from erosion (I was living here when the groins were originally built in the 1980s), I am very concerned about the proposed changes to the beach and the hard landscaping to one of the few lakeside areas in this part of the city. Many people now come to enjoy the nature, the sandy beach and the dog parks. The proposed 4 metre road with its lighting and vehicular traffic for garbage trucks and snow plows will ruin that.

I am also very concerned about the lack of information and consultation with people who live in the area. I heard nothing about it until a flyer was put in my mailbox a week before the deadline. What are the environmental effects going to be, longterm as well as during the time of construction? How will it affect the wildlife who live in the lake and on its shores?

Surely the city has better uses for the money than to 'pave paradise' and spoil this natural setting with years of construction, pollution and noise.

This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.

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At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

Comment Cont'd

Please note that nowhere in the Terms of Reference 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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the [City's Off-Leash Area strategy](#) that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.

There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.

An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks.

Comments	Proponent's Response
Comment Cont'd	<p>Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</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.

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. It is likely the area will be nearly deserted apart from summer swimming days.

Unless there are plans to provide 24 hour police protection, I don't think the city should be encouraging people to enter this area. Think how easy it would be for an evil minded person to cut a person off from any means of escape, and calls for help would not be heard.

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?

Once this area is opened to the public, it will become a destination for groups of young people and family picnics, with barbecueing, tents and loud music. There will be a need for policing the crowds. This will not be a quiet peaceful area for a walk along the water during the warm weather.

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.

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

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People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment, but also causes public safety issues due to existing erosion hazards, lack of infrastructure, and the inability for Emergency

Comments	Proponent's Response
<p>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>Services to quickly and efficiently access the shoreline and/or bluff face. (see Section 2.5.1.1).</p> <p>This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible, while also improving overall public safety through formalized trail infrastructure and potential new and/or enhanced access points.</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>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>See response to Comment #1. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront.</p> <p>Protecting the sensitive natural areas of the Scarborough Bluffs is also one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p>

Comments	Proponent's Response
<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 seems very doubtful. It would be much cheaper, to simply provide emergency help by water, three wheelers, or by snowmobile. 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>	<p>See response to Comment #1.</p>

I am writing to express my deep concern and strong opposition to the proposed extension of the Scarborough Bluffs West Project through Balmy Beach. As a resident who grew up in this area from childhood, and regular visitor to this unique and cherished part of our city, I believe this project poses a serious threat to the natural environment, recreational spaces, and community well-being.

This extension, which would extend 4.3 km from Silver Birch to Bluffer's Park, involves massive lakefill and construction that could cost over \$150 million and take years to complete. Yet, there has been little public consultation—many in our community are just now learning about the project as it enters the Environmental Assessment phase.

This project threatens:

The loss of our sandy shoreline and off-leash dog park

Increased traffic, noise, and parking strain in the southeast corner of the beach

Disruption of the RC Harris Filtration Plant's surroundings with a new access road

Environmental degradation caused by four-season road construction accessible to snowplows and trucks

Saving the Bluffs from erosion is a worthy goal, but it must not be tied to infrastructure that disrupts one of the city's most beloved beaches. There are alternative solutions that protect our natural spaces without destroying what makes them special.

I urge the Ministry to halt or reconsider this extension and conduct a thorough, transparent consultation process with affected residents before moving forward.

Thank you for your attention to this urgent matter. I trust you will take the

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

As no Alternatives have been developed yet, construction costs have not been estimated. There is no reference to a cost of \$150 million in the Terms of Reference or any circulated project materials.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area/R.C. Harris. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

voices of concerned citizens into account.

Please note that nowhere in the Terms of Reference 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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the [City's Off-Leash Area strategy](#) that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.

The project team also acknowledges the significance of the R.C. Harris Water Treatment Plant and the need to ensure relevant architectural and heritage values are not compromised. However, it is also noted that the grounds are open to use by the community and there is a recognized need to provide better access across the site and to the beaches to the east, as people are unsafely accessing the beach over a locked gate and fence, showing the demand for waterfront access and recreation.

Comments	Proponent's Response
Comment Cont'd	<p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

As 20+ year residents of the Scarborough Bluffs West Project area, we applaud the City of Toronto and Ministry efforts to revitalize the waterfront in the City's east end. The Terms of Reference (ToR) for the Project reflect a thoughtful approach to the Environmental Assessment (EA) framework. However, we would like the Minister to consider additions to the Project Objectives that reflect unique opportunities to enhance the waterfront experience while maintaining consistency and coordination with other relevant policy initiatives.

Section 2.4 of the ToR identifies 5 objectives for the Project which will inform the range and type of alternatives that will be considered in the EA. Table 4-1 then identifies several evaluation criteria and indicators for each objective. For *Objective 3: Enhance the Waterfront Experience*, one of the indicators is to improve public access to the waterfront, including the "potential to provide direct public access to and into the water." We would like the Minister to add the words 'throughout the year' to this indicator to reflect the growing interest – both locally and globally - in accessing the water year-round for its proven health and welfare benefits. Many northern countries have embraced the gifts of their winter water bodies. The revitalization of our waterfront should reflect this beneficial aspect of Lake Ontario that is being enjoyed by an increasing number of community members.

Additionally, *Objective 5: Achieve Value for Cost*, should incorporate an indicator that considers the reduction in health care costs associated with improved winter waterfront access for local communities.

The initiative to enhance our waterfront – throughout the year – is consisted with several related policies, including the following:

- Section 2.3.2 of the Official Plan, Toronto's Greenspace System and Waterfront, which supports efforts to 'improve the public realm with ....natural settings that please the eye and lift the spirit and support a sense of belonging to the community."

Thank you for your suggestions.

The provision of access to and into the water throughout the year is already implied as the objective is not limited to any season. However, this will be made explicit in the discussion of the objective in the Environmental Assessment. We note that it is very difficult to quantify any reduction in health care costs, as suggested.

Comments	Proponent's Response
<ul style="list-style-type: none"> <li>The Living City Policies for Planning and Development in the Watersheds of the Toronto and Region Conservation Authority, specifically policies that “promote an integrated approach to revitalization of the waterfront that provides for increased public access and recreational opportunities”</li> </ul>	Response Cont'd

Comments	Proponent's Response
<p>I am a resident of The Beach in Toronto, and I am writing to express/register my strong concern with respect to the SBW project, in particular the potential eradication of the natural beach environment across the 4 easternmost streets of Toronto Beaches: Nursewood, Neville Park, Munro Park, and Silver Birch (I will refer to as Eastern Beaches). I would like to urge clarity on specific proposals for this as a requirement of the SBW project. The goal would be to enhance or maintain the publicly-enjoyed (and lauded) more-natural environment of the Eastern Beaches and not have these damaged beyond recognition as an ill-debated side-cost of this large project. This is my request, and I would love to hear how I might go about more completely having these concerns reflected and utilized within the objectives of the SBW project? I had highlighted many of these in initial surveys on this project, but still have no clarity on any impacting proposals other than the desperate word-of-mouth communications that are being sent out in front of this Terms of Reference feedback deadline.</p> <p>Please see below wrt the salient points of my concerns (and which also reflect those of a great many that I know who I could take specific effort to represent if that is what would be required). I would be happy to discuss these concerns further with you or with anyone else.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p><u>Eastern Beaches:</u> This is a publicly-accessible 4 blocks of natural sand beach facing the lake, attached to neighbourhoods, quieter with more "stationary" usage (rather than higher pass-through sections of beach in other areas). This is beyond the bluffs and west of the Harris Filtration Plant. It is obviously used widely by people from all over Toronto and offers a differentiated beach experience from other parts of the Toronto Beaches. Will this be destroyed by a 4m-wide road built on landfill? It feels that lack of discussion on high-impact specific alternatives with respect to SBW and how it might impact the Eastern Beaches, is grounds for a failing grade wrt soliciting open feedback on this wrt this most-impacted neighbourhood. A lot of this high-impact has been flying "under the radar", with little or vague neighbourhood-specific language, and almost entirely bluff-focused language in almost all of the Terms of Reference.</p>	<p>See response to Comment #1. No Alternatives have been developed yet. They will be developed during the Environmental Assessment and will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at the Eastern Beaches. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>Please note that nowhere in the Terms of Reference is there discussion of a road being explored. The project will explore the feasibility of a shared, multi-use trail that runs along the Beach up to the Balmy Beach Club for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>

Comments	Proponent's Response
<p><u>Concern:</u> Communication has been unclear and soft-pedaled with respect to the impact on this area, with little or no specific plans available wrt this other than word of mouth from attendees to meetings. From these, we understand that a 4m-wide paved road with emergency and garbage access is being considered to be placed on landfill across the Eastern Beaches. I know of many citizens, including those in favour of the broader goals of the SBW project, who are *strongly* against this part of the project and how it will impact 4 full blocks of environmentally-and-municipally-unique and more-natural beach parkland in the Eastern Beaches.</p>	<p>See response to Comment #2.</p>
<p><u>Access:</u> is a cited goal in the Terms of Reference, but wrt the Eastern Beaches, this will pave over and eradicate the publicly-accessible and quieter part of an urban beaches system. The SBW itself is not a multi/continual-access urban promenade; it is about 2 miles of road with one (or no other) very steep access points along the way and under the bluffs, that would come at the cost of, I would argue, of destroying 4 blocks of neighbourhood-anchoring natural beachfront and \$150 million. Wrta the Eastern Beaches, it will provide "access" to this point, only by landfilling and paving it over; thus irreparably changing the thing to which it is seeking to provide access. It would seem self-evident that not every natural environment, such as park paths and lawns, needs an access defined as landfilling and paving. In this, the unique-to-our-city urban, natural beach setting in the The Eastern Beaches should be preserved so as to continue producing enjoyment for Toronto beach goers and dog walkers seeking a less transitory environment, and natural waterfront experience that helps anchor the unique attraction of the entire Beaches neighbourhood. This neighbourhood is one of the rare examples of what Toronto looks like before things get paved over.</p>	<p>See response to Comment #2.</p> <p>As no Alternatives have been developed yet, construction costs have not been estimated. There is no reference to a cost of \$150 million in the Terms of Reference or any circulated project materials.</p>

Comments	Proponent's Response
<p><u>Alternative Considerations:</u> Again, it does the most harm to the Eastern Beaches (but, as an aside to my most urgently-felt concerns for this area, I am also of the mind that we could provide steep multiples more of better-utilized access to our entire urban community by spending the targeted \$150 million on further upgrades in public transportation, rather than building a two-mile stretch of road on landfill with one or no access points between the start and end). However, aren't there other solutions available on existing municipal land for the, as-represented, municipal vehicles only, that will be using this? Why not access the already-in-place road from Kingston Road through-and-on the Harris filtration plant and ramp those down to whatever 4m-wide road is to be built, if this must be the case?</p>	See responses to Comments #2 and #3.
<p><u>Communication:</u> There has been much communication about SBW, but specifically very little (or nothing) is available wrt plans across. The invitation for feedback closes this Sunday. And a group I am in contact with that are following closely have raised concerns over the specific details with respect to plans that I have brought up. I fully own missing any meetings on this, but that doesn't mean I'm not an interested participant in the process who does not need the information, given that I have missed it, and I can find no specifics other than the word-of-mouth representations as to what is being considered for the most-affected neighbourhood, the Eastern Beaches.</p>	See response to Comment #1.

Comments	Proponent's Response
<p>I'm writing to express my strong support for the Scarborough Bluffs West Revitalization Project. This initiative is a much-needed investment in public access and environmental protection along one of Toronto's most beautiful and underutilized waterfront areas.</p> <p>One of the most important elements of this project is its potential to create a continuous, off-street multi-use trail. The City has struggled to build safe and effective bike infrastructure on city streets, often due to political resistance and limited space. This project presents a unique opportunity to offer cyclists a safe, scenic, and uninterrupted route that avoids these common obstacles.</p> <p>It's worth noting that some of the same individuals who oppose bike lanes on streets are also objecting to this off-street alternative. But that only underscores how critical this project is. Residents of Scarborough and the east end deserve protected cycling routes that actually connect communities—something that benefits daily commuters, recreational users, and families alike.</p> <p>Moreover, the project's focus on shoreline access, ecological conservation, and inclusivity for people of all abilities is both responsible and forward-thinking. If executed with care, this project could become a legacy piece of infrastructure that protects the bluffs while allowing more people to enjoy and respect them.</p> <p>Thank you for your work on this initiative. I hope to see the City continue to move this project forward and make it a priority for future funding and implementation.</p>	<p>Thank you for your support.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

I am very concerned about the city's plans for development along the waterfront east of the RC Harris water filtration plant. Below are some of my concerns:

Increasing access to the Bluffs without proper environmental safeguards could end up harming the very habitat we're trying to protect. I'm not against improvements, but we need to think carefully about how increased human activity will affect the local wildlife and ecosystem. We need more robust plans for environmental management.

As a local resident, I'm concerned about the environmental impact of creating more access points to the Bluffs. The area is already sensitive, and with increased foot traffic, the natural habitat could be seriously compromised. We need to make sure that conservation remains the top priority.

Based on what I've witnessed at other public spaces like Woodbine Beach, I have serious concerns about how the city will manage cleanliness and safety along the new trail at the Bluffs. With increased foot traffic, we're likely to see more garbage, abandoned barbecues, and safety concerns which the city is struggling with on current beaches.

This study is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process such that potential environmental effects of public infrastructure projects are considered before a project begins.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

Comments	Proponent's Response
	<p>The project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p> <p>Please note that protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.</p> <p>As part of the Environmental Assessment process, terrestrial and aquatic impacts will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

Comments	Proponent's Response
<p>I have been a Beaches East York Resident for over 35 years and I am concerned about this proposed project. I would also like to mention that it concerns me as I live on Nursewood Road and this is the first I am hearing of it despite the fact that you say you held two community meetings in 2024. This feels like you are trying to sneak it past residents.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

One of my concerns is that people can already access the Beach at Nursewood Rd., Neville Rd., and Kingswood Rd., These streets have public stairs that are maintained. Silverbirch Rd. extends to the beginning of the boardwalk and has an access point built in. Access for the public is not a problem in these areas. In fact it is quite easy and I worry that taking this away, and the paving of the beach will also affect local businesses. The beach is quite busy in the summer and a lot of local businesses in the area, though not on the beach directly, depend on the influx of customers. I believe the proposed changes will reduce visitor traffic which I will explain why below.

Taking away the beach as it is and turning it into a multiuse trail suitable for vehicular access will make the beach less accessible to people and limit its use. The accessibility to vehicles will also make it a more dangerous area and families with young children may choose to go elsewhere because of it. The loss of the off-leash dog-park will also both cause people to go elsewhere and induce them to take their dogs off-leash in non-designated areas thereby making it more dangerous for everyone else, and might further reduce visitor traffic. That also means paving over several areas that have been set aside for native plants to grow which would have a negative environmental impact.

No Alternatives have been developed yet. They will be developed during the next stage of the project, the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the

Comments	Proponent's Response
<p>I worry about how this construction and proposed plan will affect water intake at the R.C. Harris Water Treatment Plant, which is the largest in the city and provides water for around 40% of Toronto. Since the plan goes right in front of it, I worry that it, the construction, debris and settlement specifically, would negatively impact the plant and its function.</p> <p>I also have concerns about the construction damaging the houses on the street leading to the Beach: Nursewood, Neville, Kingswood and Silverbirch as well as any others. This would cost the city a lot of money to be responsible for any damages that occurred as a result of this project.</p>	<p>community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>At this time, nothing has been proposed at or around R.C. Harris.</p> <p>Once a Preferred Alternative has been selected, a detailed effects assessment will be undertaken to evaluate the anticipated effects construction and establishment/ operation of the project may have on the environment. Mitigation measures will be identified and/or refinements to the Preferred Alternative made to avoid or minimize these impacts to the greatest extent possible.</p>

Comments	Proponent's Response
<p>I am confused about how it would revitalize the Bluffs area because even with an expanded shoreline the Bluffs would still make the area dangerous, due to the possibility of falling debris and not a safe destination for families or large numbers of the public to gather.</p> <p>Paving the area would increase the risk of flooding for the houses in the area, many of which have a problem with flooding already. I also believe that the digging would disrupt local wildlife, including more specifically rats and other vermin which would then create a large problem for residents in the area, as has been seen in the past for large construction projects.</p>	<p>A key objective of the project is to minimize natural hazards and risks to public safety caused by erosion. As part of the Environmental Assessment, any 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. Top of bluff (tableland) trails will also be developed for evaluation, outside the erosion hazard area.</p> <p>As noted above, the project will explore the feasibility of a shared, multi-use trail for pedestrians and cyclists that meets the <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p> <p>Table 4-1 includes preliminary criteria and indicators that will assess the potential for impacts to existing communities and land uses.</p>
<p>I agree that erosion protection is important, but this seems to be an excuse to develop the area instead of the main concern. Instead erosion protection and development should be uncoupled, because it seems that when they are coupled together the development takes precedence and the erosion protection comes secondary or a distant third. A possible solution to this is to start the proposed development West of the R.C. Harris Water Filtration Plant, and leave everything to the east of it alone. This would lessen the impacts to the residents, and the plant itself, as well as keep a functional and easily accessible beach while still working to provide erosion protection to the rest of the shoreline.</p>	<p>The Eastern Beaches were added to the study to investigate opportunities for a trail connection from the existing Eastern Beaches boardwalk trail to R.C. Harris and the potential future Scarborough Bluffs West Trail. If this was not considered, there would be a gap in the trail network from Silver Birch Beach to R.C. Harris. This is an important opportunity to holistically address erosion, access and habitat integrity together such that the current and future demand of people seeking to access the waterfront for recreation can be managed.</p> <p>As noted above, a "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p>

The Bluffs are a true destination point not only for local residents but for the entire City and for many visitors. This special part of the City needs to be protected so that future generations can continue to visit and enjoy our Scarborough Bluffs as a **Natural Icon**.

We question and are **Concerned why the project reviewing the Bluffs was split in 2 parts** and if data related to the 2019 study is still relevant considering significant changes and development that is taking place at the top of the hill above the Bluffs. It is concerning that despite many follow ups the **City and TRCA have been unable to share studies** that address cumulative impact of the massive scale of development that is being proposed running parallel to the Bluffs. We're curious why the **Environmental Assessment is not considered** in accordance with The City of Toronto Official Plan, Chapter 3.4, and Provincial EA Regulations,

Today, the Scarborough Bluffs West Revitalization Study is starting, does it not seem prudent to consider reviewing East and West together at this time? Would this not give a thorough understanding of what must be done to fully protect Scarborough Bluffs?

In the old Mayor's Office at Scarborough Civic Center is a hand carved plaque that reads, **"Scarborough, the City above the Bluffs"**.

Let's ensure that we do what is needed so that we can continue to make this proud statement about Scarborough and **Protect our Environment** similar to the Rouge Valley.

The Scarborough Bluffs West Study is a separate Comprehensive Environmental Assessment process from the previously approved Scarborough Waterfront Project. While consideration will be given to the plans approved through the Scarborough Waterfront Project Environmental Assessment process, and linkages will be explored where appropriate to improve connectivity across the broader Scarborough waterfront, the Scarborough Bluffs West Project will seek to develop Alternatives that are appropriate for the shoreline/tableland conditions and best serve the community and anticipated users west of Bluffer's Park.

These projects are differentiated due to the complexity of and variability in the shoreline and community conditions between two project Study Areas.

Construction for the Scarborough Waterfront Project is scheduled to commence this Fall 2025, starting with the Brimley Road South Multi-Use Trail and followed by the West Segment shoreline and multi-use trail. For more information on the Scarborough Waterfront Project, please visit the [project website](#).

The Scarborough Waterfront Project Environmental Assessment was undertaken in accordance with the Official Plan and Provincial regulations, as is the Scarborough Bluffs West Project Environmental Assessment.

As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The

<b>Comments</b>	<b>Proponent's Response</b>
	Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.

I have lived in the Beaches area for 49 years and I've never seen a proposal that threatens the character of our community as much as the Scarborough Bluffs West Project extension.

Balmy Beach is not just a stretch of sand - it's a vital part of our neighborhood's soul. Generations of families, including mine, have walked its shoreline, played with dogs in the off leash area, swum in the waters off the piers of Balmy Beach and found peace in its natural beauty. These aren't just conveniences, they are what makes the Beaches neighborhood unique and this proposal is completely out of step with its character. Turning this area into a wide, lit, all-season access road that can accommodate garbage trucks and emergency vehicles would forever change what makes the Beach so special and beloved.

This project would fundamentally alter one of the last remaining stretches of natural, untouched shoreline in our area. This plan would require extensive landfill and hard landscaping along a fragile and ecologically sensitive beach.

We stand to lose not just a peaceful stretch of natural beach, but also the unique character of this community space, (including the off-leash dog area) and the quiet enjoyment it brings to locals and visitors alike. The environmental impact—both in terms of construction disruption and the permanent loss of shoreline habitat—has not been adequately studied or communicated. Many in our community, myself included, were unaware of this proposal until recently.

There has been little effort to consult with those of us who will be most affected. We deserve to be heard before irreversible changes are made. The lack of meaningful consultation with local residents — especially those of us who have been here for decades — is deeply frustrating. We've cared for and protected this place for years, and we deserve a voice in decisions that will reshape it.

Please reconsider this extension. The cost to our community's identity and quality of life is far too high

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

Please note that nowhere in the Terms of Reference 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).

Please do not let this project go forward as planned. Protect Balmy Beach—once it's gone, it's gone forever. There are ways to address shoreline erosion without permanently altering the identity and ecology of this cherished place.

Please help us preserve the natural beauty and integrity of Balmy Beach and the surrounding waterfront.

Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.

The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the [City's Off-Leash Area strategy](#) that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.

Protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline, including Balmy Beach. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety issues. This project recognizes that people currently, and will continue to in greater numbers, seek access to the waterfront for recreation and tries to manage that use to minimize the impact on adjacent neighbourhoods and residents, where possible.

There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with

<b>Comments</b>	<b>Proponent's Response</b>
	<p>the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

Comments	Proponent's Response
<p><b>1.0 LIST OF DOCUMENTS</b></p> <p>The following documents have been reviewed in the preparation of these comments:</p> <ul style="list-style-type: none"> <li>• Scarborough Bluffs West Project, Environmental Assessment Terms of Reference, June 2025, including all Appendices and reports, studies, plans and documents referred therein.</li> <li>• Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario, MECP</li> <li>• Report to Toronto City Council dated April 25, 2024 (2025.MM29.18)</li> <li>• Geotechnical Investigation and Slope Stability and Erosion Risk Assessment Fallingbrook and Birchcliffe Shoreline, Toronto, Terraprobe, July 31, 2023</li> <li>• Scarborough Shoreline, Terrestrial Biological Inventory and Assessment, TRCA, 2012</li> <li>• Beach litter photographic study, BLUFFS Inc., Summer 2024</li> <li>• Consultation Record with Proponent</li> <li>• Attached EA comments to MECP from Pat Becker</li> <li>• Attached coastal comments to MECP from Chris Houser</li> <li>• Attached planning comments to MECP from Mike Mannett • Attached ecology comments from Anthony Francis</li> <li>• Attached traffic comments from Christopher Gordon</li> </ul>	<p>Comment noted.</p>

Comments	Proponent's Response
<p><b>2.0 THE SCARBOROUGH BLUFFS ARE ICONIC</b></p> <p>The Scarborough Bluffs and the adjacent Lake Ontario shoreline represent one of the most recognizable landforms in Toronto. Their significance extends beyond landform into many realms, including geology, sociology, natural heritage and history.</p> <p>In addition to the Bluffs landform, the Study Area includes:</p> <ul style="list-style-type: none"> <li>• the Needles, the most dramatic segment of the Bluffs landform</li> <li>• R.C. Harris Water Purification Plant, historically and architecturally significant</li> <li>• the Hunt Club, Toronto's most scenic golf course</li> </ul> <p><i>" These are the Scarborough Bluffs, internationally famous for the story they tell of the glacial history of the region (Coleman, 1909, 1932, 1936; Karrow, 1967) and a local landmark in their spectacular scenic beauty when viewed from the lake and the beach. The tablelands at the top offer splendid views over the lake and have naturally proved to be attractive for residential development and for a golf course, parks and pathways. The Bluffs are thus a rich resource of scientific and educational interest and a significant scenic amenity offering a range of opportunities for recreation as well as providing exceptionally fine sites for homes and a number of apartment buildings. Any city would regard such a stretch of shoreline as a priceless inheritance ." Quotation from: Vegetation and Erosion on Scarborough Bluffs, York University, 1978 [emphasis added]</i></p>	Comment noted.

Comments	Proponent's Response
<p><b>3.0 THE STANDARD OF CARE FOR AN ENVIRONMENTAL ASSESSMENT OF SCARBOROUGH BLUFFS</b></p> <p>Commensurate with their iconic status, any change being considered in the landform, land use or waterfront configuration should be carried out with care and attention. Strict conformance with the Comprehensive EA requirements and expectations should be met through this process. This standard of care should apply to all phases of the Comprehensive EA, inclusive of public consultation, preparation and approval of the Terms of Reference, preparation and approval of the Comprehensive EA, and detailed design.</p> <p>Notwithstanding, the iconic nature of the Study Area and the complexity of the coastal, ecological, geographical, geotechnical and hydrogeological forces that exist and interact to create the iconic waterfront, the Proponent states in their consultation materials the <i>"Desire to expedite the Terms of Reference and Environmental Assessment process"</i> (ToR, Appendix B, May 14, 2024 virtual meeting)</p> <p>This is a process that cannot be rushed.</p> <p>In the opinion of BLUFFS Inc., and as set out herein, the public consultation process and the Terms of Reference have not met the minimum standards set out for a Comprehensive EA. Furthermore the reliance on numerous aged and out of date studies is not appropriate for this Study Area, which is extremely complex and variable.</p>	<p>The quotation taken from the Terms of Reference, Appendix B, May 14, 2024 (virtual meeting) is included in the slide deck as part of a summary of what the project team heard from the public during Round 1 of the consultation process, as indicated by the 'What We Heard' header.</p> <p>As the study is regulated under the Environmental Assessment Act, it is not possible to expedite the process which has prescribed stakeholder consultation requirements, and regulated review and approval timelines.</p>

#### **4.0 EXISTING CONDITIONS ARE NOT PRESENTED COMPREHENSIVELY IN THE ToR**

The EA background documents are being cited as evidence that the area has been extensively studied, and is sufficiently understood to proceed with the EA. Upon review of the EA Background Documents, it is evident that the Study Area is extremely complex, highly variable, and not easily characterized due to the complex interactions between Lake Ontario, the bluff landform, the geology, the groundwater, vegetation, migrating birds, habitats, human activities, etc. A very simplistic overview of some of the complex interactions is described below:

- rain falls on the tableland
- a portion of the rain is conveyed as surface runoff over the top of bluff, which nourishes slope vegetation, but also causes slope erosion on bare soils
- some rain infiltrates the ground and becomes groundwater
- the groundwater is conveyed in multiple and complex geological layers at various horizontal and vertical locations throughout the Study Area
- the groundwater discharges from the bluff face creating slope instability which causes slumping and slope failures
- the slope failures create steep exposed bluff faces
- the exposed bluff becomes habitat for threatened species, like bank swallow
- the groundwater discharges continue down the bluff face and create highly unique wetland features in most unexpected locations, extending from the beach up the extremely high, steep slope
- the wetland is habitat for many species, including bugs which are food for birds, bats, fish, reptiles, etc.
- the eroded soils are washed to the beach, where they accumulate
- the lake wave action picks up the eroded material where it joins other lake material and becomes part of the littoral drift
- the littoral drift feeds dynamic beach processes locally, and are part of a littoral system that sustains Lake Ontario beaches that originally extended to Hamilton Harbour and created the Toronto Islands
- the sediment, bugs and organic material washed from the bluff becomes food to sustain fish in Lake Ontario

The City and Toronto and Region Conservation Authority agree that the existing environment is complex, but it is also highly influenced by human activities. Approximately 94% of the shoreline has been altered by shore protection works, with a number of stormwater outfalls, development along the tablelands, and people now and increasingly in the future seeking to access the shore and the water's edge for recreation. The existing conditions detailed in Section 5 reflect the full definition of environment in the Environmental Assessment Act including the important and on-going changes related to human use and activities.

Only portions of the Study Area are designated as Environmental Significant Areas and/or Areas of Natural and Scientific Interest as a result of both their geologic and ecological attributes. As indicated in Table 4-1, impacts to vegetation communities of concern (a key criteria for designation of Environmental Significant Areas and Areas of Natural and Scientific Interest) will be considered as part of the evaluation of Alternatives. The Environmental Assessment will also address how the earth and life science values, features and functions will be protected and maintained, if impacted by the Preferred Alternative. Both the Ministry of Environment, Conservation and Parks, and the Ministry of Natural Resources, who regulate impacts to flora Species at Risk and Areas of Natural and Scientific Interest, respectively, will be reviewing agencies through the Alternatives development and evaluation process.

As confirmed on a number of occasions, Alternatives have not been developed yet. However, the

Comments	Proponent's Response
<ul style="list-style-type: none"> <li>the fish are food for the birds and mammals</li> </ul> <p>The Study Area is an environmentally significant area (ESA) and an area of natural and scientific interest (ANSI) for good reason. These complex interactions are not identified in the ToR. This raises questions about the Proponent's plan to modify the Bluffs ecosystem.</p> <p>Fundamentally, the lake and the bluff cannot be separated without adversely affecting each other. The lake created and sustains the bluff. Similarly, the bluff sustains the lake. Yet, the Proponent is proposing to separate the lake from the bluff by destroying the existing natural beach and dynamic lake system and constructing a new platform on reclaimed land extending into the lake, complete with parks, a new pedestrian, bicycle and vehicle thoroughfare, recreational uses, etc.</p> <p>The impact of separating the lake from the bluff can be understood in the context of another urban park. It would be similar to taking the Rouge River out of the Rouge Valley. The valley that was formed and sustained by the river would still be there, but its fundamental lifeforce would be removed.</p> <p>The ToR has not addressed these complex interactions based on the following observations:</p>	<p>Alternatives considered will not be exclusively lakefill options. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. <b>A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</b></p>

## Dynamic Beaches

Provincial, City and TRCA policies prohibit the site alteration of a dynamic beach. The majority of the existing waterfront is characterized by sand/cobble beaches of varying widths. This can be viewed clearly in the video of the Study Area that is included on the project website.

The ToR has characterized the existing beach as being altered along 94% of its length. Based on MNR Guidelines, beach alteration does not preclude the presence of a "dynamic beach", which is a protected landform. MNR further recommends that a site specific study be undertaken as a prerequisite to classifying an altered beach. The ToR takes the position that the beaches in the Study Area are not dynamic beaches without providing evidence to support that statement. The ToR does not include a requirement for a beach characterization study to clarify the extent of dynamic beaches in the Study Area.

Please also refer to the coastal report prepared by Chris Houser, appended to these comments, which identifies dynamic beaches in the Study Area and provides additional coastal characterization comments.

It should be noted that this study is not regulated under the Planning Act. It is regulated under the Environmental Assessment Act. This project and the Environmental Assessment approval process, are distinct from development and site alteration on privately-owned lands subject to the Planning Act and approval of the municipality. The definitions relating to 'dynamic beach' included in the Ministry of Natural Resources technical guide (2001) are in the context of defining the dynamic beach hazard as a natural hazard and ensuring it is managed appropriately. Protection of a dynamic beach hazard is relevant when considering development and site alteration that are subject to the Planning Act. As noted by MPLAN Inc. on page 5 of Supplement Attachment #1, "*The PPS 2024 definition for Development includes the creation of a new lot, a change in land use or the construction of buildings and structures requiring approval under the Planning Act but specifically excludes activities that create or maintain Infrastructure authorized under an environmental assessment process. Active Transportation systems are included in the definition of Infrastructure. Therefore, trails would be considered infrastructure and would not be considered development provided that environmental assessment approves their creation.*"

The project team's coastal engineering consultant has assessed this stretch of shoreline and characterized the beaches. Section 5.1.13 of the Terms of Reference describes the existing shoreline protection features along the Project Study Area shoreline, including the beaches, all of which exist in conjunction with the hardened shoreline features.

Comments	Proponent's Response
	<p>Except for the western beach at Bluffer's Park, <b>none of the sand and/or cobble headland-beaches along the Project Area shoreline are a dynamic beach</b>. They are engineered together with the groynes (beach and groyne systems) to form integral parts of the works that protect the shoreline and the Bluffs. While the western beach at Bluffer's Park formed because of the constructed headland, it accumulated naturally and is not a component of any protection design.</p> <p>Toronto and Region Conservation Authority and the City are focused on improving conditions where people seek recreation by creating/restoring the area for safe, nature-based recreation and public access.</p>
<p><b>Groundwater</b></p> <p>Groundwater discharge down the slope and onto the beach is clearly visible and described in the EA Background Studies as the primary cause of slope instability, yet the ToR makes passing reference to groundwater.</p> <p>There is no requirement to collect site specific hydrogeologic information, even though it is cited as the primary source of slope instability. It is also a major constraint to developing alternatives, as the crest of stable slope and risk lines are highly influenced by the presence of groundwater.</p> <p>The ToR does not require a hydrogeology study to document the base conditions and assess future conditions, such as:</p> <ul style="list-style-type: none"> <li>• the extent and impact of blocking groundwater discharges by filling</li> <li>• increased risk of instability and slope failures from filling</li> </ul>	<p>It is unclear what background document is being referenced. The Terms of Reference clearly indicates in Section 5.1.3 that the steepness of the Bluffs is the result of historical toe erosion caused by wave action from Lake Ontario. Groundwater contributes to on-going erosion but is not the primary cause. The baseline conditions with respect to groundwater flow and seeps are understood. The project team includes geotechnical engineers who will participate in assessing risk associated with instability and slope failures (see discussion of the risk line in Section 4) and will identify erosion and/or slope stabilization measures as required.</p> <p>A review of groundwater seepage and its implications on slope stability and erosion will be included in the Geotechnical Conditions Analysis that will be appended to the Environmental Assessment document. (see Section 5.6).</p>

Comments	Proponent's Response
<p><b>Wetlands</b></p> <p>Many sections of the bluff include extensive wetland vegetation extending far up the bluff slopes from the beach. This is consistent with the abundant and well documented presence of groundwater seeps that emerge from the exposed face of the bluff.</p> <p>The ToR (pg. 57-59) and Appendix D.1 identifies vegetation types using the ELC classification system. Within the study area, the number and size of vegetation groupings that rely on moist and wet conditions are summarized below:</p> <p>Moist 11.71 Ha      Marsh 5.79 Ha      Swamp 2.71 Ha      TOTAL 20.21 Ha</p> <p>This is further supported by Appendix D.3, which illustrates significant portions of the bluff slope labeled as "Unevaluated Wetlands".</p> <p>Wetlands should be evaluated using the Ontario Wetland Evaluation System (OWES), the Provincial requirement that was created to inform Ontario's land use planning process.</p> <p>It is BLUFFS Inc.'s opinion that the ToR are incomplete by omitting the presence of wetlands in the study.</p> <p>The ToR should be amended to require the identification, staking and evaluation of all potential wetlands in the Study Area in accordance with Provincial requirements.</p>	<p>The Terms of Reference has not omitted wetlands from the study, as they are shown in Appendix D.1 and D.3 as you have noted. However, please note that Appendix D.3 will be updated, as the map includes an error where some beach and bluff communities were blended with wetland communities, showing a false overrepresentation of wetland presence. Appendix D.1 showing wetland communities (marsh and swamp) identified through the Ecological Land Classification system remains the same, and Appendix D.3 will be revised to match. The "moist" communities are not considered wetlands – these are forest or cultivated tree communities.</p> <p>An Ontario Wetland Evaluation System study will not be undertaken for the Project Study Area. In December 2022, the Ontario Wetland Evaluation System was changed through Bill 23. These updates included removal of wetland complexes, where individual wetlands are grouped based on their functional connection. As a result, no wetland along the Scarborough Bluffs West Project Study Area shoreline would be eligible for evaluation through the Ontario Wetland Evaluation System as they are all individually less than the minimum 2 hectares in size. The <u>City of Toronto Official Plan's Map 12B</u> includes up-to-date mapping of Provincially Significant Wetlands, which are not located in the Project Study Area.</p>

Comments	Proponent's Response
<p><b>Littoral Material</b></p> <p>The movement of littoral material through the Study Area to the Lake is stated as negligible under existing conditions. This is not supported by the EA Background Studies, which have quantified the littoral contribution into and along the Lake. The Background Studies have also identified the need to maintain the sediment contributions for the health of the wider lake ecosystem - even artificially, if required.</p> <p>The ToR is suggesting use of hard surfacing like revetments and rip rap to separate and protect the newly created (and vulnerable) landform from erosion by the lake. Yet, the background documents recommended natural beaches as the most ecologically appropriate and sustainable method of joining land and water.</p>	<p>Quantification of littoral sediment transport, as described in Section 5.1.11, was described by the project team's coastal engineering consultant. This analysis factored in the shoreline's existing erosion protection features, as well as current sediment budgets, which have been altered over time due to the presence of the existing erosion protection features in the immediate Study Area, and to the east, including Bluffer's Park. Littoral sediment transport through the Study Area has changed over time due to the addition and/or modification of the shoreline with erosion protection features along the broader Scarborough waterfront.</p>

## 5.0 ToR STUDIES ARE NOT CURRENT

The ToR is relying on aged or out of date studies to characterize the Study Area. This is not appropriate for this EA with its inherent complexity and high profile. Some examples include:

### ToR Section 5.2.1 Vegetation Communities

Vegetation and flora species of concern are noted in the ToR as being surveyed in 2016 and 2011. While the ToR commits to include "a full list of species" in the EA Report, this full list will be a reflection of 9 and 14 year old surveys - and older by the time the EA Report is approved.

The ToR should include a requirement for a vegetation study that reflects the current vegetation in the Study Area and also the current legislative requirements and current list of species of concern.

### ToR Section 5.2.2 Wildlife Habitat and Wildlife

Wildlife species of concern are noted in the ToR as being surveyed in 2016 and 2011. While the ToR commits to include "a full list of species", this full list will be a reflection of 9 and 14 year old surveys - and older by the time the EA Report is approved.

The ToR should include a requirement for a wildlife study that reflects the current wildlife in the Study Area and also the current legislative requirements and current list of species of concern.

#### **Geotechnical** - Erosion Control Study, Scarborough Bluffs, Geocon Inc., 1982

The geotechnical study referenced in the Background Studies was commissioned 43 years ago as a high level study. Some notable quotations are presented below [emphasis added]:

The Terms of Reference is not relying on aged or out of date studies to characterize the Study Area. The historical reports referenced in Table 2-1 of the Terms of Reference are background and/or reference documents that have contributed to the long history of planning for the Scarborough Waterfront. Section 5 of the Terms of Reference identifies the studies and reports that have been used to create the baseline. Section 5.6 details the studies to be undertaken to support the project and will be included in the Environmental Assessment. These include:

- Coastal Conditions Analysis
- Geotechnical Conditions Analysis
- Terrestrial Biological Inventory
- Aquatic community monitoring
- Stage 1 Archaeology Assessment

Section 5.6 also provides a commitment that should additional studies be identified, pending the outcome of the Alternatives development and evaluation process, and through further consultation with applicable regulatory agencies, these will be undertaken as necessary and documented in the Environmental Assessment.

With regards to fauna and flora data, as per Toronto and Region Conservation Authority's best practices, fauna data is updated every 10 years, while flora and Ecological Land Classification Data is updated every 15 years. This standard has been developed based on decades of data collection and observations across Toronto and Region Conservation Authority's jurisdiction to identify the time period within which notable species and community changes are anticipated to occur. However, some updates to

" A limited programme of field investigation was carried out to permit an initial appraisal of the soil and groundwater conditions within the Bluffs to be made ." Note: a total of 24 boreholes were advanced over a bluff length of approximately 15 kilometers, six of which are located in the current Study Area.

" The data used in respect of the subsurface conditions were based on the results of the boreholes drilled and the limited laboratory testing involved... ... the results now available confirm that more work is necessary in this respect before detailed analysis and designs can be made ."

" It is recommended that a programme of surveillance procedures and monitoring instrumentation be established for the Bluffs as a whole, so that their performance can be observed regularly on an on-going basis "

" Smectite was found in some of the Scarborough Clay at South Marine Drive. In view of this, and its importance with respect to possible deep-seated instability , it is recommended that the base of the Scarborough Clay formation be studied in more detail at a number of locations to determine the spatial extent of smectite-bearing clay and its strength properties. The matter of long-term stability as influenced by potential deep-seated failures, could then be reviewed on the basis of these findings ".

" Further investigation is recommended to develop a more complete picture of the groundwater conditions within the Don Sand, Scarborough Sands and Clays, and Sunnybrook Till formations ."

The ToR does not provide guidance on the status of the recommended supplemental field work and studies.

Due to the age of the report, and the limited field investigation and monitoring, the ToR should require a current geotechnical study to current standards with sufficient boreholes, laboratory analysis, and monitoring to properly characterize the Study Area. This is particularly important as risk

fauna and flora records do occur sooner than these prescribed monitoring timelines.

Fauna records are intermittently updated through documented observations from iNaturalist that can be verified by Toronto and Region Conservation Authority ecologists.

Where a system has changed notably (e.g., recent development, confirmed impact of an invasive species such as Emerald Ash Borer, etc.), a flora and Ecological Land Community survey may be undertaken sooner. However, given the existing shoreline protection works and tableland development pre-date the last survey, a fulsome vegetation community update is not currently anticipated to take place earlier than the planned 15 years.

The Geotechnical, Groundwater and Nearshore Environment reports referenced were not used to describe the baseline conditions in Section 5. These reports are part of the history of planning for the Scarborough waterfront.

lines and stable top of slope lines require accurate geotechnical information.

**Groundwater** - Vegetation and Erosion on the Scarborough Bluffs, York University, 1978

This Background Study was commissioned 47 years ago to assess the causes of chronic slope erosion, and concluded that the Bluffs is geologically complex, and groundwater discharge was the pervasive factor in the ongoing loss of soil. Some notable quotations are presented below [emphasis added]:

" vulnerability to erosion varies with variations in stratigraphy and the supply of water. Thus, we are dealing with a complex of factors which varies continuously along the length of the Bluffs."

" This (groundwater) is the major agent in the recession of the Bluffs. The other three (frost, wind, surface runoff) may be locally important but seepage is a pervasive factor throughout and causes the main loss of material."

" Undertake appropriate hydrological studies of seepage in the Bluffs which would lead to measures to greatly reduce or channel seepage. This is an essential first step in stabilizing slopes and encouraging the establishment of vegetation ."

The ToR does not provide guidance on the status of the recommended hydrogeology study, nor is a hydrogeology study included in the Background Studies.

The ToR should require a current hydrogeology study with sufficient boreholes, monitoring wells, laboratory analysis, and seasonal measurements to properly characterize the Study Area. This is particularly important as risk lines and stable top of slope lines require accurate hydrogeological information.

Comments	Proponent's Response
<p><b>Near Shore Environment - Waterfront Erosion Control Site Report, MTRCA, 1987</b></p> <p>This Background Study was commissioned 38 years ago to assess the near shore aquatic environment following the completion of coastal erosion works. The report was commissioned prior to the widespread practice of stormwater management, prior to the general elimination of combined sewer overflows, and may have been influenced by recently completed erosion projects. Conditions have changed substantially, and the ToR should include a current, comprehensive near shore study. This is particularly important due to the EA objective of enhancing fish habitat. The enhancement cannot be measured if there isn't a current baseline to measure against. The degraded conditions of 1987 are not an appropriate baseline.</p> <p>Reliance on current data and analysis is critical to the EA process.</p>	

## 6.0. EA IS PREMATURE

Page 85 of the ToR states, *"there are no areas within the Project Study Area for which the existing conditions preclude the development of Alternatives."* BLUFFS Inc. believes this statement reflects the incomplete state of the Study Area characterization.

Essential studies of existing conditions have not been completed by the Proponent to identify site conditions that may preclude the development of Alternatives. Significant examples include:

### Dynamic Beach Hazard

In accordance with MNR Guidelines, a beach characterization study is required for an altered beach to verify the possible presence of a "dynamic beach". A dynamic beach would preclude site alteration and lake filling in those areas. In the opinion of the BLUFFS Inc.'s coastal expert, Chris Houser, the Study Area includes dynamic beaches. The extent to which development of Alternatives is precluded will not be known until the beach study is completed and approved.

### Wetlands

Abundant wetland vegetation is documented in the ToR in much of the Study Area, and Appendix D3 illustrates the location of vast expanses of "Unevaluated Wetlands". An OWES study should be required to characterize these Unevaluated Wetlands and determine their preservation status, buffers, etc. The extent to which development of Alternatives is precluded by wetlands and buffers will not be known until the OWES study is completed and approved.

### R.C. Harris Purification Plant

The Study Area includes the R.C. Harris Water Purification Plant.

### Dynamic Beach Hazard

As noted above, the beaches have been characterized by the project team's coastal engineering consultant and are described in Section 5.1.13 of the Terms of Reference.

Except for the western beach at Bluffer's Park, none of the sand and/or cobble headland-beaches along the Project Area shoreline are a dynamic beach. They are engineered together with the groynes (beach and groyne systems) to form integral parts of the works that protect the shoreline and the Bluffs. While the western beach at Bluffer's Park formed because of the constructed headland, it accumulated naturally and is not a component of any protection design.

### Wetlands

Please see response to Comment #7.

### R.C. Harris Purification Plant

Section 5.3.7.2 includes an overview of all known built heritage resources and cultural heritage landscapes within the Project Study Area. A total of 11 properties have been identified, including the R.C. Harris Water Treatment Plant.

The project team acknowledges the significance of the R.C. Harris Water Treatment Plant and the need to ensure relevant architectural and heritage values are not compromised. However, it is also noted that the grounds are open to use by the community and there is a recognized need to provide better access

Comments	Proponent's Response
<p>The building and site was designated by the City of Toronto in September 1997 under the Ontario Heritage Act. In 1992, the plant was declared a National Historic Civil Engineering Site by the Canadian Society for Civil Engineering. In 2014, the American Water Works Association designated the plant as a Canadian Water Landmark.</p>	<p>across the site and to the beaches to the east, as people are unsafely accessing the beach over a locked gate and fence, showing the demand for waterfront access and recreation.</p>
<p>The historical designation of the R.C. Harris site, which includes the seawall, precludes the development of Alternatives that alter the site (which includes the seawall).</p>	<p>Alterations to heritage properties listed under Part IV of the Ontario Heritage Act, such as the R.C. Harris Water Treatment Plant, are not prohibited from alteration. Should alteration be proposed, a Heritage Permit through the City of Toronto may be required. The Ministry of Citizenship and Multiculturalism, who administers the Ontario Heritage Act, is also a reviewing agency for this project.</p>
<p><b>Planning</b></p> <p>Refer to attached planning opinion from Michael Mannett who believes the planning framework precludes "development" in the form of lake fill to create new landforms.</p>	<p>Planning</p>
<p>The EA should be suspended pending completion of the fundamental studies, and clarification of the planning framework.</p>	<p>Please see response to Supplemental Attachment #1 (MPLAN Inc.) below.</p>
<p><b>7.0 CO-PROPONENTS HAVE A CONFLICT OF INTEREST</b></p> <p>TRCA is a landowner, Proponent, self-described expert, commenting agency and Regulator. Furthermore, half of the TRCA Board of Directors is comprised of City of Toronto Directors - the Co-Proponent.</p> <p>TRCA's mandate is to protect the natural environment. It is said that the prosecutor cannot be the defender. If TRCA is the Proponent seeking to modify the environment, who is protecting (defending) the environment on behalf of the public?</p>	<p>For clarification on the matter of conflict of interest, the Ministry of Environment, Conservation and Parks is the approval authority for the Comprehensive Environmental Assessment, which involves extensive review by all applicable regulatory agencies at both the provincial and federal level. The Environmental Assessment is prepared by Toronto and Region Conservation Authority and the City of Toronto as project proponents, but it is <b>not</b> evaluated by the proponents. Environmental Assessments must be evaluated by the Ministry of Environment, Conservation and Parks through approval of the Minister.</p>

## 8.0. ToR ARE NOT COMPLETE OR BALANCED

The ToR set out a high-level vision for the study which is aspirational in nature and is not clear or explicit. The EA is proceeding on the basis of "Do Something", yet "something" is not defined.

While the ToR lacks clarity, significant clarity is provided in a Report to Toronto City Council dated April 25, 2024 (2025.MM29.18), which provides a clear description of "something".

The Report to Council states "*the intent of the Project is to explore a wide range of reasonable options, including tableland solutions and/or shoreline solutions*" [emphasis added].

The ToR provides no guidance on tableland alternatives. While the bluff ecosystem is extremely complex, the tableland setting is no less complex.

The tableland alternatives are significantly constrained by many factors, including:

- the tableland is fully built out and in a mature state
- the land required for a high capacity waterfront trail is not readily available without altering/impacting existing land uses
- the high capacity waterfront trail must be harmonized with arterial, collector and local roads
- the Background Studies were explicit in the need to protect local residential roads and neighborhoods from the negative impacts of increased traffic and parking, and other nuisances, such as noise and trespassing
- the tableland may include protected vegetation or wildlife
- significant socio-economic impacts are expected in the tableland setting

Despite the explicitly stated intention to develop and study tableland alternatives, that may even extend across the majority of the Study Area, the ToR provides no framework to study tableland alternatives.

The Terms of Reference has acknowledged the complexity of the Project Study Area. Additional clarity around the "Do Something" Alternative was provided in the Terms of Reference following the draft review period. Please see Section 3 which states:

"The "Do Something" Alternative may include some combination of the following, within all segments of the Project Study Area at the top and/or toe of the Bluffs:

- Shore protection works.
- Aquatic and terrestrial habitat enhancements.
- New and/or enhanced access points.
- Multi-use trail.
- Public spaces.
- Erosion and slope stability measures.
- Lakefill to facilitate any of the above.

Different combinations of the above (known as Alternative Methods) will be established based on the framework presented in Section 4 and will be consulted upon during the EA phase of the project as described in Section 6. The Project team will consider the option to "Do Nothing" through each stage of the Project." [emphasis added]

Both Step 1 and Step 2 in Section 4 establish the framework for how shoreline and tableland solutions will be developed. This will include determining the possible footprint of various Alternatives at the toe of slope **and** top of slope (Step 1), and identification of desired design elements for toe of slope **and** top of slope Alternatives (Step 2), based on the feasible footprints identified in Step 1.

Comments	Proponent's Response
<p>The imbalance in the ToR can be illustrated by the omission of even the most fundamental studies. The ToR does not require a traffic study, which would set out the baseline conditions, and would allow measurement of impacts under the various alternatives. Similarly, the ToR does not include a parking study, which is required for the same reasons.</p> <p>The ToR needs to include the same rigour for the tableland impact assessment as is contemplated for the waterfront solution.</p>	<p>With respect to traffic and parking concerns, the Environmental Assessment will include an assessment of construction traffic and each Alternative will be assessed as to their connectivity with transit, active transportation networks and parking. Furthermore, the ability to add parking in the vicinity of access points will also be explored.</p> <p>Acknowledging the community's concern regarding increased traffic and street parking, the project team will explore the feasibility of undertaking a study of transportation options during the Environmental Assessment, recognizing the limitations of that data.</p>
<p><b>9.0 CONSULTATION PROCESS</b></p> <p>The minimum requirements for a successful consultation process are set out in the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario. The most fundamental expectations set out in the Code include:</p> <ul style="list-style-type: none"> <li>• clarity</li> <li>• transparency</li> <li>• completeness</li> <li>• not contradictory, and</li> <li>• speaking in the language of the common person</li> </ul> <p>As set out in the attached Proponent Consultation Record, it is the opinion of BLUFFS Inc. that the requirements of the Code of Practice have not been met.</p>	<p>The consultation process was completed in accordance with the requirements set out in the Ministry's "Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario", the "Code of Practice for Consultation in Ontario's Environmental Assessment Process", and best practices.</p>

<p><b>9.1. Information presented to the public was incomplete, and not supported with evidence.</b></p> <p>The public consultation materials included statements concerning the following elements:</p> <p><b>Garbage and Litter</b></p> <p>The Proponent stated that the waterfront in the Study Area is characterized by garbage and litter. The Proponent was asked to provide evidence, which was not provided.</p> <p>BLUFFS Inc. has collected photographs of the majority of the Study Area waterfront (approximately 500 images appended to this report) which demonstrated the almost total absence of garbage and litter throughout the Study Area.</p> <ul style="list-style-type: none"> <li>• the Proponent was advised that high volume public access would encourage litter - the very problem they're claiming to solve.</li> <li>• the Final ToR has now removed references to extensive garbage, except for a single reference to some nuisance litter in one specific, isolated location immediately adjacent east of R.C. Harris - known as Secret Beach</li> <li>• the public perception arising from the mischaracterization was never corrected during the consultation period.</li> </ul> <p><b>Unauthorized Trails</b></p> <p>The Proponent stated that the waterfront is characterized by unauthorized longitudinal trails traversing the Bluffs Study Area that was negatively impacting the ecosystem.</p> <ul style="list-style-type: none"> <li>• the Proponent was asked to provide evidence, since the bluff topography consists of overly-steep, forested embankments, declining to a flat, narrow, sand/cobble beach. The challenging terrain was generally not suited to longitudinal walking trails. Rather the public walks on the flat beach, away from the vegetated slopes.</li> <li>• the Proponent did not provide evidence to support their statement.</li> </ul>	<p><b>Garbage and Litter</b></p> <p>Garbage and litter were cited as effects of unmanaged use on the terrestrial ecosystem, not as a rationale for the project. The project team has also been on site and has photos of garbage and litter.</p> <p><b>Unauthorized Trails</b></p> <p>Unauthorized or informal trails were cited as effects of unmanaged use on the terrestrial ecosystem, not as a rationale for the project. One example is the informal trail at the base of Warden Avenue. Another example is trails traveling west along the shore from the base of the Fishleigh access.</p> <p><b>Toe Erosion</b></p> <p>The toe erosion imagery was used to illustrate the general process of erosion. Even when shoreline erosion protection is put in place and halts erosion at the toe of the Bluffs, erosion does not stop immediately. Erosion will continue until the stable slope is reached, which is why landslides are still observed along currently protected sections of shoreline. This is why establishment of the top and toe of slope risk lines will be critical to determine the potential footprint for future Alternatives, to ensure public access is considered outside of the erosion hazard area.</p> <p>The slide on which the illustration was included directly acknowledges the existing shoreline erosion protection, stating: "Throughout the study, reference will be made to existing erosion management structures already in place to help manage shoreline erosion along the Bluffs West area."</p>
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Comments	Proponent's Response
<ul style="list-style-type: none"> <li>the Proponent was advised that increased access to the Study area would greatly increase unauthorized trails which would negatively impact the ecosystem.</li> <li>the public perception created by the Proponent that unauthorized trails were a threat to the ecosystem in need of an immediate solution throughout the study Area was never corrected during the consultation period.</li> </ul> <p><b>Toe Erosion</b></p> <p>The presentation materials for the public meeting presented the process of bluff down-cutting, which can cause regression of a bluff system due to coastal erosion forces at the base of the bluff followed by inland slope flattening to a stable angle. The consultation materials depicted a generic coastal process that is geologically correct, but generally not reflective of the current state of toe erosion in the Study Area.</p> <p>With coastal erosion generally arrested throughout the Study Area, the down-cutting process isn't occurring at this time. Rather the erosion is attributable to inland slope instability.</p> <p>The presentation materials created an incorrect public perception that existing coastal erosion is a chronic problem in need of immediate attention.</p>	

Comments	Proponent's Response
<p><b>9.2 Critical Information was Withheld from the Public</b></p> <p>The nature of the trail was not presented to the public.</p> <p>A trail was mentioned in the context of how people "move through the waterfront". When reference is made to "<u>the waterfront</u>", from the public perspective, it can only mean <u>the existing waterfront</u>, and not some new waterfront that might be constructed in the future.</p> <p>The existing waterfront is generally characterized by narrow beaches under the influence of floodwaters, waves, etc. and is regulated by TRCA as hazard land. This would create a public perception of a modest, naturalized, waterfront trail, like a signpost guided nature walk or a boardwalk.</p> <p>Upon completion of the consultation period, the Proponent advised the public that the trail was a high capacity trail for pedestrians and cyclists, the highest order trail serving users on a regional scale. This trail would be designed to a road standard to accommodate large Fire, Police, Ambulance and maintenance vehicles, and designed to meet City safe passage requirements (located outside of all hazards).</p> <p>The nature of the trail being considered was not presented to the public, thereby lacking clarity and transparency.</p>	<p>During the May 2024 public consultation meetings, references to the shore protection works of similar waterfront projects such as the Scarborough Waterfront Project and the Port Union Waterfront Improvement Project were made in the pre-recorded presentation and during verbal discussion. Both projects included lakefill to facilitate a multi-use trail facility.</p>

Comments	Proponent's Response
<p><b>9.3 The essence of the undertaking was not shared with the public</b></p> <p>The presentation materials stated that the EA would investigate the feasibility of a continuous waterfront trail. Those familiar with the remote location, the inaccessible terrain, natural hazards and restrictive zoning (Natural Area) would believe that this was not possible except for a modest trail identified above.</p> <p>After the completion of the public consultation period, the Proponent clarified that the project objectives could all be achieved by filling Lake Ontario. In this way, the existing topographic, access and natural hazards that currently constrains the Study Area would be eliminated through massive site alteration to create a new landform.</p> <p>It is generally understood that trails are subordinate to and are applied to an existing landform. When the landform doesn't exist, then the Proponent isn't really planning a trail, they are creating a new landform, which will include a trail, among other uses.</p> <p>The presentation materials did not mention filling Lake Ontario to create a new landform. The omission of lake fill and landform creation in the consultation materials left the public with an incomplete understanding of the EA undertaking which lacked clarity and transparency.</p>	<p>See response to Comment #15.</p> <p>Reference was also made to these similar projects, as well as the Lakeview Waterfront Connection Project, during the meeting hosted in October 2024 with interested residents to discuss their questions and comments on the draft Terms of Reference. Additional questions and discussion was had around lakefill specifically. See Appendix C in the Record of Consultation.</p>

Comments	Proponent's Response
<p><b>9.4 A New Project Name</b></p> <p>Since the inception of the project, the EA has been called the Scarborough Bluffs West Revitalization Project. From a public perspective, the name literally means to bring back to life, implying a degraded state in the Study Area in need of a solution.</p> <p>The Proponent was advised that the name did not reflect site conditions, as this area was alive and thriving. It may be the most ecologically diverse area in Toronto - teaming with aquatic, terrestrial and bird life.</p> <p>With the submission of the Final Terms of Reference, the Proponent changed the name to "Scarborough Bluffs West" by removing the word "Revitalization". BLUFFS Inc. believes that the name change is significant, and is an acknowledgement that the Study Area is thriving and not degraded.</p> <p>The negative public perception associated with "Revitalization" was never corrected during the consultation process.</p>	<p>The updated project name was made specifically in response to public feedback and the confusion around what the word 'revitalization' meant in the context of this project. The change was acknowledged in the Terms of Reference foreword, and was addressed in the draft Terms of Reference public comment disposition table (see Appendix A.1).</p> <p>Use of the term 'Revitalization' was to link the project to the 2022 City staff report (<a href="#">Next Phase of Waterfront Revitalization</a>) which speaks to the next phase of waterfront revitalization.</p> <p>We have removed the word revitalization from the project name to assist with clarity on the project's intent.</p>

Comments	Proponent's Response
<p><b>9.5 Only a single "Alternative To" presented to the public</b></p> <p>"Alternatives To" are functionally different ways to solve the problem which must be developed and presented to the public in the ToR. The Proponent offered a single Alternative To - which is "Do Something".</p> <p>Do Something provides no clarity and no transparency. Do Something comes free of boundaries and limitations, and essentially allows the Proponent to Do Anything.</p> <p>The consultation materials stated that the Proponent would study the feasibility of a waterfront trail while studying tableland trail alternatives. This distinction is significant, as a waterfront trail is functionally different from a tableland trail. The function of a tableland trail is to connect waterfront destinations. The function of a waterfront trail is to offer a waterfront experience (recreation, parks, fishing, water access, boating, etc.). Accordingly, there are at least two functionally different "Alternatives To".</p> <p>"Alternatives To" should have been presented in the consultation materials and ToR in accordance with the MOE Code of Practice.</p>	<p>During the consultation events, and as part of the pre-recorded presentations, examples were given to describe "functionally different alternatives." Alternative Methods are different ways to solve the identified problem and opportunity. For the Scarborough Bluffs West Project, the problem/opportunity is described in Section 2.5 and consists of habitat integrity, erosion and risk to public safety, and access to and along the waterfront. Section 3 recognizes that given the complexity of addressing the problem/opportunity in a holistic manner the reasonable "Alternatives To" are to "Do Something", defined as including a number of components that may be implemented holistically at the top of the Bluffs in the tablelands or at the toe of the Bluffs. Options at either the top or toe of the bluffs can all address the identified problem/opportunity in different locations; therefore, the location of the trail is an Alternative Method. This is consistent with the Scarborough Waterfront Project Environmental Assessment and the Lakeview Waterfront Connection Environmental Assessment. Within the Terms of Reference, waterfront is defined as both the top and the toe of the bluffs.</p>

Comments	Proponent's Response
<p><b>9.6 Public Consultation Meeting</b></p> <p>Only a single public meeting was held for the ToR, notwithstanding the iconic nature of the Study Area. No public presentation was made by the Study Team and there was no opportunity to ask questions in a public forum.</p> <p>The Study Team did not include a coastal engineer at the public consultation meeting, so there was no ability to ask questions about coastal conditions, seemingly the most significant element of the Proponent's undertaking. Questions about dynamic beaches and the permissibility of site alteration could not be answered by the Study Team who attended the meeting.</p> <p>The public consultation meeting did not provide project clarity or process transparency commensurate with a project of this significance.</p>	<p>The public events hosted by the project team are summarized in Section 3.5 of the Record of Consultation. A total of three public consultation events were hosted between January 31, 2024 and May 28, 2025. At each event participants were encouraged to submit questions for virtual events, or ask questions at the drop-in event.</p> <p>Additional meetings with other stakeholders, including the Community Advisory Group, landowners and an interested group of residents, are also summarized in Section 3 of the Record of Consultation. For each of these events presentations were made and opportunities to ask questions and provide feedback followed.</p> <p>Questions about dynamic beaches and coastal conditions have been responded to throughout the development of the Terms of Reference in correspondence with stakeholders. All of this correspondence has been drafted with the coastal engineers.</p>
<p><b>9.7 Public Consultation Record</b></p> <p>The Public Consultation Record in the ToR is a distilled summary of the issues raised by the Public as recorded by the Proponent. The Public's authentic voice was not presented in that Record.</p> <p>Some of the public comments provided to the Proponent are appended to this report.</p>	<p>The Record of Consultation captures the feedback provided to the project since project commencement (November 2, 2023) to the end of the draft Terms of Reference review period (August 7, 2024). It also includes an additional meeting with interested residents in October 2024 to discuss their comments on the draft Terms of Reference.</p> <p>Comments received after this window of time, outside of the Terms of Reference Ministry review period, will be documented in the Record of Consultation for the Environmental Assessment.</p>

Comments	Proponent's Response
<p><b>9.8 Summary of Consultation Process Concerns</b></p> <p>It is BLUFFS Inc.'s opinion that the Public Consultation Process did not meet the minimum MOE requirements of clarity, transparency, no contradictions and appropriate language as set out in the Code of Practice. BLUFFS Inc. recommends the Public Consultation Process should not be approved by MECP through the review of the ToR.</p>	<p>The consultation process was completed in accordance with the requirements set out in the Ministry's "Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario", the "Code of Practice for Consultation in Ontario's Environmental Assessment Process", and best practices.</p>

## 10.0 FOCUSING

Focusing can be applied where a project has been through a previous public process, and the public should reasonably be aware of the scale and nature of the undertaking.

The Background Studies go back to 1967, long before many of the residents in the Study Area were born. It is not reasonable to rely on public processes that are long since past and would not be familiar to the current population.

While the Study Area has a long history of planning and studies going back to 1967, there is not a single unified vision that is illustrated or described in the documents.

The 1967 document proposed extensive filling of Lake Ontario using refuse and contaminated debris to create a new man-made island including a new municipal road located in the lake to provide scenic drives, and providing public access for regattas and gondola rides. Most of the Bluffs in the study area were deemed too challenging/sensitive to alter, thereby requiring the creation of a new island.

The EA Study Team explicitly confirmed that the vision set out in the 1967 Waterfront Study was not being considered for the Study Area. This was very helpful to confirm what the Study is not proposing, but tells the public nothing about what it is proposing.

Early studies recognized the ecological and access challenges offered by the bluffs, and recommended tableland connections with intermittent access at high volume locations such as Bluffers Park.

Other adjacent studies completed by the Proponent for the Bluff east of Buffers Park recommended that the Bluffs area largely be left in a natural state to preserve the sensitive ecology and recommended no further hardening.

As noted in Section 1.3.1 and Section 3 of the Terms of Reference, Toronto and Region Conservation Authority and the City of Toronto are completing a 'focused' Environmental Assessment, in accordance with Section 17.4(1) of the Environmental Assessment Act.

The need and justification for the Scarborough Bluffs West Project has been established through a number of previous policies and planning studies (as described in Section 2), along with the existing policies in the City of Toronto's Official Plan and Toronto and Region Conservation Authority's The Living City Policies that further reinforce the need for **a holistic solution to address the issues of access, improved experience, erosion, and habitat improvements**. The list of studies in Table 2-1 also includes several recent studies that have reaffirmed the goals of equitable access, improved experience, habitat improvement, reconciliation, and management of erosion risk. Further, City Council reaffirmed many of these goals in the 2022 Update on the Next Phase of Waterfront Revitalization. To suggest that the project team has relied primarily on a 1967 study is false.

These studies and plans identify the need for integrating improved public access with erosion protection works and habitat improvements along the section of the Scarborough waterfront between the Eastern Beaches in the west and Bluffer's Park in the east. As has been discussed on several occasions, none of the documents in Table 2-1 suggest the Alternative Methods to be considered as part of this Environmental Assessment; the

Comments	Proponent's Response
<p>The varying visions over time does not lend itself to focusing, as the City's vision has never been in focus. With nearly 60 years of study, and a claim to be "focused" on a vision set out in a previous public planning process, the Proponent should reasonably be able to show the public that focused vision. Yet, after 60 years, the best and most complete description of the Alternative To offered in the ToR is "Do Something".</p> <p>The Background Studies provided an illustration of their ever evolving vision for the waterfront. If the Proponent isn't relying on any of those visions, the public cannot reasonably be expected to understand the nature and scope of the proposal, and the EA cannot be focused.</p> <p>The description of the proposed works as "Do Something", and the absence of any specific and concrete Alternatives To, is a clear indication that the project is not focused.</p> <p>In BLUFFS Inc.'s opinion, the project is not focused. Furthermore, by proceeding with "Do Something", which cannot be described, located, or even pointed to on a map, the Project appears to be the opposite of focused.</p>	<p>Alternative Methods will not be developed until the Environmental Assessment phase.</p> <p>The Scarborough Waterfront Project Environmental Assessment, completed by Toronto and Region Conservation Authority and the City of Toronto in 2019 for the waterfront from Bluffer's Park east to East Point Park recommended a waterfront trail and shore protection works from Bluffer's Park up to the east side of Grey Abbey Ravine. BLUFFS Inc. is incorrect to suggest that there was a recommendation against further hardening.</p>
<p><b>11.0 CONCLUSION</b></p> <p>Based on the foregoing, the ToR should not be approved.</p>	<p>Comment noted.</p>

Expert Report #1 – MPLAN Inc.

Conclusion: “Based upon a review of these policies (The Living City Policies), as well as the Provincial Policy [sic] Statement 2024 and the City of Toronto Official Plan policies, the proposed “Project” for the construction of a water’s edge connection through a trail system along the shoreline at the base of the most significant bluff area of the Scarborough Bluffs, is not appropriate.”

“An Environmental Assessment based on a project proposed by, authored by, and evaluated by the TRCA in order be [sic] completed to the satisfaction of the TRCA, as a process is clearly flawed.”

“LAKEFILLING AND SITE GRADING, WHICH IS A LARGE-SCALE MODIFICATION OF TERRAIN, PERMANENT PLACING/DUMPING OF MATERIAL ORIGINATING ON THE SITE OR ELSEWHERE, CREATING A LOT AND CHANGING LAND USE, COULD NEVER MEET THE INTENT AND REQUIREMENTS OF THE TRCA LIVING CITY POLICIES OR THE INTENT OF THE CITY OF TORONTO OFFICIAL PLAN.”

As noted in the consultant report on page 5:

*“The PPS 2024 definition for Development includes the creation of a new lot, a change in land use or the construction of buildings and structures requiring approval under the Planning Act **but specifically excludes activities that create or maintain Infrastructure authorized under an environmental assessment process.** Active Transportation systems are included in the definition of Infrastructure. Therefore, trails would be considered infrastructure and would not be considered development provided that environmental assessment approves their creation.”*

This project is not regulated under the Planning Act. It is regulated under the Environmental Assessment Act, which sets out the planning and decision-making process for considering potential environmental effects of public infrastructure projects before a project begins. This project and the Environmental Assessment approval process, are distinct from development and site alteration on privately-owned lands subject to the Planning Act and approval of the municipality.

Currently, Toronto and Region Conservation Authority and the City of Toronto are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference. Alternatives have not yet been developed. Therefore, it is premature to assume that the Environmental Assessment will identify the preferred location of a trail as being at the base of the Bluffs. The project Alternatives will be developed during the next Environmental Assessment phase, following

	<p>approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>The planning and design of a trail or trails as part the proposed works for this project will employ the project principles of safety, resilience, and be informed by public consultation, in accordance with the Terms of Reference, Toronto and Region Conservation Authority's Strategic Plan and The Living City Policies. Accordingly, Alternatives will be presented to the public for feedback at later stages of the Environmental Assessment process.</p> <p>For clarification on the matter of conflict of interest, the Ministry of Environment, Conservation and Parks is the approval authority for the Comprehensive Environmental Assessment, which involves extensive review by all applicable regulatory agencies at both the provincial and federal level. The Environmental Assessment is prepared by Toronto and Region Conservation Authority and the City of Toronto as project proponents, but it is <b>not</b> evaluated by the proponents. Environmental Assessments must be evaluated by the Ministry of Environment, Conservation and Parks through approval of the Minister.</p> <p>With regard to the comments on Toronto and Region Conservation Authority's Living City Policies, there are salient sections in the document specific to public use of the Lake Ontario shoreline that were not cited.</p> <p>For example, section 7.2.4 states,</p>
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	<p>“It is the policy of TRCA:</p> <ul style="list-style-type: none"> <li>a) To prevent, eliminate or reduce the risk of flood and erosion hazards to life and property through: i. appropriately planned development, site alteration, recreational use, and infrastructure; ii. shoreline protection works that are undertaken on a comprehensive reach basis and naturalized to the extent possible; and iii. the conveyance of hazard lands into public ownership, where feasible.</li> <li>b) To promote an integrated approach to revitalization of the waterfront that: <ul style="list-style-type: none"> <li>i. provides for increased public access, recreational opportunities and a continuous trail system;</li> <li>ii. preserves and enhances public views of the Lake and its shoreline features;</li> <li>iii. improves or restores the quality of water, beaches and terrestrial and aquatic natural habitats of the shoreline; and</li> <li>iv. connects and links waterfront habitats and amenities to valley and stream corridors.</li> </ul> </li> </ul> <p>It can be of further note that an objective of the Recreational Use policies in section 7.4.5 is, “for recreational use that minimizes impact to the natural environment by striving for a balance between conservation and appropriate public uses;”.</p> <p>Additionally, section 7.4.6 Conservation Use, is specific to public conservation lands and projects, and states:</p>
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Comments	Proponent's Response
	<p>That the development of new facilities and conservation-related accessory uses on publicly-owned conservation lands be undertaken through a comprehensive management plan process, integrated with the broader social needs of the community and based on appropriate environmental studies, provincial and municipal requirements, and opportunities for public consultation.</p> <p>The current process being undertaken by the City and Toronto and Region Conservation Authority under the Environmental Assessment process is consistent with all of the above.</p>

Expert Report #2 – Kilgour & Associates Ltd.

Conclusions:

“The EA process must begin by updating several key background points.

1. Most of the species lists referred to in the TOR are at least seven years old. As such, they can no longer be relied upon to adequately describe the resident flora and fauna in the area, especially with respect to species at risk. Other (protected) species not previously identified have taken up residence along the bluff in the intervening period. The TOR must include a requirement to begin with an update of the species inventories in the vicinity of the proposed project area and a review of protections on those species. Without an up-to-date inventory, the EA risks approving development that would otherwise contravene the *Endangered Species Act* (ESA).
2. With respect to species at risk legislation generally, the recent passage of Bill 5 has set the stage for rapid and substantial alterations to the ESA. Subsequent policy updates related to the implementation of that act, however, will only be developed slowly over at least the next year or more. Knowing that the legal environment regulating and managing species at risk is currently in an ongoing state of flux, the TOR should indicate that the EA start be delayed until relevant SAR policies have been updated to consider Bill 5. There may otherwise be regular and contentious rescoping of mitigation requirements prescribed by the EA.

The Ecological Land Classification for the area indicates the presence of multiple wetland ecosites along the bluff, but the TOR materials are unclear as to whether those features have been formally reviewed under the Ontario Wetland Evaluation System (OWES) for consideration or possible designation as Provincially Significant Wetlands. An OWES review should be properly completed before any review of potential project impacts on them is undertaken under the EA process. The TOR should specifically require an OWES review.”

1. See response to Comment #9 in the primary comment/responses above.
2. The Ministry of Environment, Conservation and Parks, who administers the Endangered Species Act, is the approval authority for the Comprehensive Environmental Assessment. The Environmental Assessment process also involves extensive review by all applicable regulatory agencies at both the provincial and federal level to ensure compliance with all applicable Acts and regulations.

Given the long-term duration of the Comprehensive Environmental Assessment process (typically five years), additional changes to Species at Risk lists and policies are possible within that timeframe. Prior to any construction, detailed design and permitting/approvals processes will be undertaken in required consultation with applicable regulatory agencies, including the Ministry of Environment, Conservation and Parks, to ensure continued compliance with all applicable Acts and regulations at that time. Currently there is no funding secured for either detailed design or construction of the future Preferred Alternative. Delaying the Environmental Assessment will not negate the need for a future updated assessment of appropriate mitigation measures to reflect future changes to the Endangered Species Act, or other applicable Acts, at the time of design, permitting and construction.

3. In December 2022, the Ontario Wetland Evaluation System was changed through Bill 23.

Comments	Proponent's Response
	<p>These updates included a change to the minimum size a wetland must be in order to be evaluated (i.e., minimum area of 2 hectares), and removal of the concept of wetland complexes, where individual wetlands are grouped based on their functional connection. As a result, no wetland along the Scarborough Bluffs Project Study Area shoreline would be eligible for evaluation through the Ontario Wetland Evaluation System as they are all individually less than 2 hectares in size.</p>
<p><u>Expert Report #3 – CGH Transportation</u></p> <p>Conclusions:</p> <p>“ ...there are several additional items to be considered to improve the process, including:</p> <ul style="list-style-type: none"> <li>• Update the TOR with greater clarity about the project, context, and considerations. Examples can be taken from the completed segment between Bluffer’s Park and East Point Park.</li> <li>• Include a list of opportunities and constraints to provide context for developing the alternatives. Insights can be drawn from the Public Comment Disposition Table attached as Appendix A of the TOR.”</li> </ul>	<p>The Terms of Reference for the Scarborough Bluffs West Project was modelled after the Terms of Reference completed for the shoreline segment between Bluffer’s Park and East Point Park (Scarborough Waterfront Project) and includes the same level of detail, although there is some variation in how the material is presented (images vs text). As part of the Environmental Assessment phase, more mapping and/or images can be incorporated to provide more clarity for technical information.</p> <p>Opportunities and constraints are detailed throughout Section 2.5. A figure to illustrate this conceptually can be included in the Environmental Assessment for clarity, in addition to the opportunity and constraints mapping already committed to in Section 5.6 that will assess how each Alternative positively or negatively impacts various natural, social, technical, and cultural environmental features.</p>

Expert Report #4 – Dr. Chris Houser

Conclusions:

“Several issues have been identified with the ToR for the Scarborough Bluffs Project based on a primary purpose to increase accessibility but justified based on protection of the natural environment:

- There is insufficient (baseline) data or evidence presented to determine if the project will maintain, enhance and/or restore the natural environment.

**Action required:** Collection

and analysis of previously published or directly acquired environmental data.

- The evidence presented is either anecdotal or based on studies that have no direct connection to the project area. **Action required:** Collection and analysis of previously published data and commissioning of scientific and engineering studies to collect site specific data.

- It is assumed that the beaches within the project area are not dynamic beaches, despite no clear precedent for this exclusion and the beaches on the western side of the project area behaving like and meeting the dimensional requirements for a dynamic beach. **Action required:**

Engineering or scientific study to formally exclude the beaches within the project area from the dynamic beach definition and associated regulations.

- The projects undertaken to increase access will either further degrade (i.e. not maintain) the natural environment (e.g., extension of Bluffer’s Park) or will not enhance and restore terrestrial and aquatic habitat. **Action required:**

Clarification of whether: 1) the project is intended to increase accessibility and enhance experience and how those modifications will maintain, restore or enhance the natural environment, or 2) the project is intended to

maintain, restore or enhance the natural environment, and how such a design could provide access and/or limit liability and hazards.”

Section 5.6 of the Terms of Reference identifies the studies and reports that have been additionally undertaken to support the project and will be included in the Environmental Assessment. These include:

- Coastal Conditions Analysis
- Geotechnical Conditions Analysis
- Terrestrial Biological Inventory
- Aquatic community monitoring
- Stage 1 Archaeology Assessment

The Coastal Conditions Analysis and/or the Geotechnical Conditions Analysis reports will speak to the topics of groundwater, sediment processes and budget, dynamic beaches, and hazards.

Many of the comments raised will be addressed in the Environmental Assessment once Alternatives have been developed and are evaluated. It should be noted that Toronto and Region Conservation Authority is one of the authors of the Toronto Waterfront Aquatic Habitat Restoration Strategy, which is a best practice document for the creation and enhancement of aquatic habitats in association with in-water works, such as shoreline protection works. Further, the Federal Fisheries Act requires the offsetting of any impacts with these types of efforts. With respect to the impacts that access improvements will have on the natural environment, protecting the sensitive natural areas of the Scarborough Bluffs is one of the objectives of this project. The Study Area has been impacted by past and on-going human use, including modification of 94% of the shoreline. Formal access to and along the shoreline in this area is limited and inaccessible for many users, including police and other

Comments	Proponent's Response
	<p>Emergency Service providers. As a result, people currently access the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use impacts the natural environment, while also causing public safety and liability issues.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront, while also improving access for Emergency Services, where possible.</p> <p>As part of the Environmental Assessment process, terrestrial and aquatic impacts will be explicitly factored into the evaluation and selection of Alternatives, and opportunities for further preserving and enhancing terrestrial and aquatic habitats will be explored, where possible (e.g., new fish habitat, wetlands, invasive species removal, tree plantings, etc.).</p>

## Expert Report #5 – P. Becker Consulting

P Becker Consulting (Patricia Becker) has reviewed the Terms of Reference for the Scarborough Bluffs West (SBW) Project based on an extensive understanding of the Environmental Assessment Act (including Comprehensive Environmental Assessments (EA)). Patricia has worked extensively with the EA Act in Ontario for over 35 years. The following are comments and concerns on the Terms of Reference and the EA process that will follow should the existing Terms of Reference be approved.

### **1.1 Problem/Opportunity Assessment**

Section 2.5 provides an assessment of the problem or opportunity in SBW Project. The project is outlined to provide an opportunity “particularly to provide access to and along the waterfront, while managing erosion and risk to public safety, and enhancing habitat integrity, where changes are proposed”. When the different sections within this assessment are reviewed additional concerns are raised that should be addressed prior to approving of the Terms of Reference.

#### **1.1.1 Access to and Along the Waterfront**

Section 2.5.1.1 states that the steep terrain and lack of shoreline continuity limit the ability to extend the trail along the shoreline in the Project Study Area. However the opportunity identified indicates that alternatives will be examined for improving access to and along the waterfront and relocating the Waterfront Trail closer to the water’s edge. Given that the preferred alternative is Do Something it is not clear whether this means that the intent is to lakefill the area to create the trail. What are the alternatives that will be investigated currently these are too broadly described to understand at this time since almost anything could be done.

Given the constraints in the Project Study Area will the trail be constructed moving with the elevation in the area or will it end leaving people to turn around or to make informal trails to continue their route?

One of the problems identified is that there are no formal access points to the shoreline in the Project Study Area. The existing informal access points

### **1.1 Problem/Opportunity Assessment**

As per the Ministry’s “Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario”, it is not appropriate to include discussion of the Alternatives in the problem/opportunity assessment. What constitutes Alternative Methods is described in Section 4 of the Terms of Reference. Table 4-1 lists the preliminary evaluation criteria and indicators, which will be consulted on again during the Environmental Assessment, once the Alternatives have been developed and prior to their evaluation.

### **1.2 Consideration of Alternatives**

The “Do Nothing” and “Do Something” Alternatives are Alternatives To, not Alternative Methods. 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 Environmental Assessment Act this is referred to as focusing.

Alternative Methods will not be defined until the Environmental Assessment phase. What constitutes parts of the “Do Something” is included in Section 3 of the Terms of Reference, while Section 4 outlines the steps that will be followed to develop the Alternative Methods during the Environmental Assessment.

### **1.2.2 Evaluation Criteria**

around R.C. Harris Water Treatment Plant, the Fallingbrook area, east of Fishleigh Drive and the bottom of Warden Avenue are to be studied for formalizing these accesses. However, within the evaluation criteria and the studies to be undertaken there are no traffic impacts or parking requirements to be studied or evaluated related to formalizing these access points. This needs to be incorporated into the evaluation criteria. If these are not included in the criteria or outlined in the Terms of Reference as studies to be undertaken then experience shows this will not be completed. If the intent is to bring people to the area to access the shoreline why was traffic and parking not considered to be a key consideration? In particular since existing transit has been shown not to provide close access to the shoreline nor are there opportunities to expand the transit routes closer to the shoreline.

### **1.1.2 Erosion and Risk to Public Safety**

It is recognized that there are erosion and slope stability issues around the Bluffs and the SWB project is seen as an opportunity to mitigate public safety risks in these areas where trails and public spaces are proposed. Again it is unclear what types of alternatives will be examined in the area to meet this.

### **1.1.3 Habitat Integrity**

Providing a trail along the shoreline will likely have the effect of encouraging people to go from the top of bluff to the shoreline to gain access to the trail. Given human nature, this would likely result in the creation of a greater number of informal trails which has not been considered in the evaluation. Since there is very limited access to the shoreline within the Project Study Area people will park where they can and then travel down to the trail regardless of where formal access points are provided. This potential impact to habitat integrity does not appear to appear to have been considered in the evaluation.

The opportunity identified is to enhance the terrestrial and aquatic natural features while addressing erosion will there be an evaluation of the existing aquatic habitat to confirm that given the wave action and natural processes

Table 4-1 lists the preliminary evaluation criteria and indicators, which will continue to be revised during the Environmental Assessment based on public input.

Parking and transportation are included as part of the evaluation under the Enhance Waterfront Experience objective, sub-criteria "Effects within the community". Emphasis is being given to transit and active transportation due to the built-up nature of the Study Area and the limited land available for parking, however, the ability to add parking in the vicinity of access points will also be explored during the Environmental Assessment process.

The potential for property loss is captured under the Achieve Value for Cost objective, sub-criteria "Estimated capital cost".

Impacts to the community from increased users is also captured under the Enhance Waterfront Experience objective, sub-criteria "Effects within the community".

The need for ancillary facilities would be common to all Alternatives, and will be assessed as appropriate once the Alternatives are developed.

### **1.3 Summary of Concerns for the Terms of Reference**

As noted above in the response to Comment #4, the City and Toronto and Region Conservation Authority agree that the existing environment is complex, but it is also highly influenced by human activities.

<p>in the area that aquatic habitat can be increased or further is lacking in the area?</p> <p><b>1.2 Consideration of Alternatives</b></p> <p>A key to a Comprehensive EA is the evaluation of alternative methods that is required to be undertaken to meet the requirements of the EA Act. While the “Do Nothing” Alternative has been identified as one of the alternatives it will only be comparatively evaluated with the other alternative being “Do Something”. There is no requirement in the EA Act to evaluate a specific number of alternatives however, the broad range of Do Something makes it challenging to understand what is being considered.</p> <p><b>1.2.1 Do Something Alternative</b></p> <p>The following is the list of seven (7) options that will be considered for Do Something:</p> <ul style="list-style-type: none"> <li>• Shore protection works</li> <li>• Aquatic and terrestrial habitat enhancements</li> <li>• New and/or enhanced access points</li> <li>• Multi-use trail</li> <li>• Public spaces</li> <li>• Erosion and slope stability measures</li> <li>• Lakefill to facilitate any of the above</li> </ul> <p>The broad list leaves uncertainty in the Terms of Reference as to what the Do Something alternative will be comprised of. For instance, will there be lakefill and shore protection works constructed throughout the entire shoreline? Will the multi-use trail extend the entire length of the shoreline through the use of lakefill or will it continue, as it presently does, to move from up and down the slope present between Kingston Road and the shore? By approving the Terms of Reference with this list of options and the Do Something alternative will this project be too wide open for approval. It is recognized that if the Terms of Reference are followed then approval of the EA will occur. Currently the project can be comprised of too many options.</p> <p><b>1.2.2 Evaluation Criteria</b></p>	<p>Approximately 94% of the shoreline has been altered by shore protection works, with a number of stormwater outfalls, development along the tablelands, and people now and increasingly in the future seeking to access the shore and the water’s edge for recreation.</p> <p>While some of the existing environmental features present challenges, they will be considered as part of the Alternatives development and evaluation process; however, they do not preclude or prohibit the development of a reasonable range of Alternatives.</p> <p>Many of the concerns identified will be addressed during the Environmental Assessment when the Alternative Methods have been developed. As stated in Section 3 of the Terms of Reference, every Alternative will be a <b>combination of</b> some or all of the seven items listed for the “Do Something”; those seven items are not individual options, they will be components of the various Alternatives developed.</p>
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Parking and transportation do not seem to be part of the evaluation of alternatives. How is it possible for transit and active transportation to be considered the only means of allowing 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 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.

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.

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.

What about ancillary facilities with a 4.5 km waterfront trail and adjacent recreational opportunities these will require washrooms. The feasibility and ongoing maintenance of sanitary facilities (water and sewer) needs to be identified in the Terms of Reference and assessed through the EA. Particularly due to the length of trail, the challenging topography, and the fact that infrastructure in regulated areas is discouraged.

Why under Social Environment and effects within the community is the only consideration on the “proximity of access points” to transit stops, cycling network and parks but not recognizing the impact on the community. In reality there are no transit stops or close access to the shoreline and people coming to visit the area or use the trail will not walk the distance to reach the trail.

### **1.3 Summary of Concerns for the Terms of Reference**

Section 5.4 provides conclusions for existing conditions and states that there are “no areas within the Project Study Area for which the existing conditions preclude the development of Alternatives”. However given that the alternative is to “Do Something” there are few limitations to this. In fact there are steep slopes, natural areas, etc. that could preclude some of the options but this statement makes it appear that there are no constraints in the area that can’t be mitigated.

Section 5.5 Potential Effects of the Project focuses on construction related impacts to the environment. This does not take into consideration the existing communities and the impact from people traveling to the area where there is limited parking and public transit in close proximity to the shoreline. Studies have shown that if you bring people access to an area they will “expand” that access and make additional trails. The impact to the environment doesn’t consider that making the shoreline more easily accessible could likely result in the creation of informal trails and greater impacts to terrestrial and aquatic habitats (existing in particular but also new ones that may be created).

Sufficient feasibility type studies were not done initially to refine the potential list of alternatives and that Do Something is too broad for an understanding of what will be evaluated during the EA process.

As an example the Terms of Reference for the Scarborough Waterfront Project identified the problems and opportunities on a segment by segment basis for the entire project area. This formed the basis for developing an understanding of the types of alternatives that would be identified and comparatively evaluated for each segment in the EA process.

Comments	Proponent's Response
<p>The uncertainty as to what will be examined within the different segments as well as what the seven options will require does not provide confidence in the alternatives that will be examined and that sufficient studies will be undertaken (e.g., traffic impact, parking) to address the environmental effects of the project during the EA process.</p>	

Sun (Scarborough United Neighbourhoods) is a Volunteer group that shares information and is connected to over 50 Resident & Community Groups (RA's) in Scarborough in addition to RA's across our city. SUN submits the following comments for your review and consideration with regards the Submission – Terms of Reference – Scarborough Bluffs West Project which has been only open since June 20, 2025.

The Bluffs are a true destination point not only for local residents but for the entire City and for many visitors. This special part of the City needs to be protected so that future generations can continue to visit and enjoy our Scarborough Bluffs as a **Natural Icon**.

We question and are **Concerned why the project reviewing the Bluffs was split in 2 parts** and if data related to the 2019 study is still relevant considering significant changes and development that is taking place at the top of the hill above the Bluffs. It is concerning that despite many follow ups the **City and TRCA have been unable to share studies** that address cumulative impact of the massive scale of development that is being proposed running parallel to the Bluffs. We're curious why the **Environmental Assessment is not considered** in accordance with The City of Toronto Official Plan, Chapter 3.4, and Provincial EA Regulations,

Today, the Scarborough Bluffs West Revitalization Study is starting, does it not seem prudent to consider reviewing East and West together at this time? Would this not give a thorough understanding of what must be done to fully protect Scarborough Bluffs?

In the old Mayor's Office at Scarborough Civic Center is a hand carved plaque that reads, "**Scarborough, the City above the Bluffs**".

Let's ensure that we do what is needed so that we can continue to make this proud statement about Scarborough and **Protect our Environment** similar to the Rouge Valley.

SUN and all the RA's look forward to continued and effective communication.

The Scarborough Bluffs West Study is a separate Comprehensive Environmental Assessment process from the previously approved Scarborough Waterfront Project. While consideration will be given to the plans approved through the Scarborough Waterfront Project Environmental Assessment process, and linkages will be explored where appropriate to improve connectivity across the broader Scarborough waterfront, the Scarborough Bluffs West Project will seek to develop Alternatives that are appropriate for the shoreline/tableland conditions and best serve the community and anticipated users west of Bluffer's Park.

These projects are differentiated due to the complexity of and variability in the shoreline and community conditions between two project Study Areas.

Construction for the Scarborough Waterfront Project is scheduled to commence this Fall 2025, starting with the Brimley Road South Multi-Use Trail and followed by the West Segment shoreline and multi-use trail. For more information on the Scarborough Waterfront Project, please visit the [project website](#).

The Scarborough Waterfront Project Environmental Assessment was undertaken in accordance with the Official Plan and Provincial regulations, as is the Scarborough Bluffs West Environmental Assessment.

As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The

Comments	Proponent's Response
<p>It is important for the local residents and resident associations to be a part of the public and stakeholder engagement process. Only locals possess a real-life insight and understanding of the area, and can share invaluable information that outsiders might miss. Our experience has been that the city and other project teams tend to look at things in parts or in silos, they are here for the time it requires to complete whatever they are working on and then move on. Locals remain, many who you may be surprised to learn, have lived in the area for generations. Locals look at things through one lens, the lens of real long term stakeholders, they are the stewards living on this land at this time and tasked to ensure that what they pass on to future stewards is a legacy of good things.</p>	<p>Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. Section 3 of the Record of Consultation contains a summary of the outreach.</p> <p>An additional five (5) rounds of outreach, including three (3) rounds of public consultation, will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>As part of the consultation process, a Community Advisory Group was formed, providing a forum for resident and other interest groups to provide feedback and comments to the project team throughout the duration of study as summarized in Section 3.3 of the Record of Consultation.</p> <p>Engagement with landowners was also undertaken during the Terms of Reference consultation period, as described in Section 3.4 of the Record of Consultation. This engagement will continue throughout the Environmental Assessment phase.</p>

We understand that the Scarborough Bluffs West Revitalization project is to be incorporated into, and is part of the already approved EA of the East Portion of the Bluffs known as the Scarborough Waterfront Project. This in itself is confusing to our community, and we question why this project was divided in two parts, with two different names. We question why the entire Bluffs were not studied at the same time, noting both projects are essentially one. Would this not have been a more logical approach and saved time, resources, and taxpayers dollars?

The Scarborough Bluffs East Revitalization Study was approved by the province in 2019, almost 10 years ago. In 2020 massive development that was not considered as part of the assessment began to appear. We have for more than 5 years attempted to engage with City Teams and the TRCA to share concerns related to cumulative impact of nearby proposed developments, one just 50 meters from the Doris McCarthy Trail, and their potential impacts on the Bluffs and the Doris McCarthy Trail but **our questions have remained unanswered**. When teams were asked why Environmental Assessment is not considered in accordance with The City of Toronto Official Plan, Chapter 3.4, and Provincial EA Regulations when developments are reviewed, **our questions remained unanswered**.

Today the Scarborough Bluffs West Revitalization Study is starting. By the time the West project is completed the East project will certainly need to be revisited, which will mean more money spent and more time needed to have full understanding of what full impacts will be. It seems there is cause as well as an opportunity to go back and bring the East and West projects review together. Can this be done and if not why not?

Our community has watched the erosion of the Bluffs over the years, which in our layman's opinion has been exacerbated by the massive infill and condo developments as well as the removal of hundreds of mature trees. Scientific studies support this opinion. We have tried in vain to involve the TRCA, but they have not helped at all, and refused our requests to engage.

We feel the SWP project should be reevaluated and a moratorium put on all development on and south of Kingston Road, until independent, expert

The Scarborough Bluffs West Study is a separate Comprehensive Environmental Assessment process from the previously approved Scarborough Waterfront Project. While consideration will be given to the plans approved through the Scarborough Waterfront Project Environmental Assessment process, and linkages will be explored where appropriate to improve connectivity across the broader Scarborough waterfront, the Scarborough Bluffs West Project will seek to develop Alternatives that are appropriate for the shoreline/tableland conditions and best serve the community and anticipated users west of Bluffer's Park.

These projects were differentiated due the complexity of and variability in the shoreline and community conditions between two project Study Areas.

Construction for the Scarborough Waterfront Project is scheduled to commence this Fall 2025, starting with the Brimley Road South Multi-Use Trail and followed by the West Segment shoreline and multi-use trail. For more information on the Scarborough Waterfront Project, please visit the [project website](#).

The Scarborough Waterfront Project Environmental Assessment was undertaken in accordance with the Official Plan and Provincial regulations, as is the Scarborough Bluffs West Project Environmental Assessment.

Toronto and Region Conservation Authority does not have the authority to review and comment on development proposals outside of their regulation limit under the Conservation Authorities Act.

Comments	Proponent's Response
<p>studies are done to determine the impact on the Bluffs erosion, wildlife, tree canopy, and bird migration. The TRCA should be working to preserve this valued treasure and not exploit it.</p> <p><b>Please consider these comments and the opportunity to complete the East and West Revitalization Study together as it should have been done in the first place</b></p>	

I am writing to express my strong opposition to the proposed extension of the Scarborough Bluffs West Project through Balmy Beach. I recently purchased a home at the end of Silver Birch Avenue, and I am deeply concerned about the impact this project will have on the surrounding neighbourhood and our quality of life.

The proposed construction—which involves significant lakefill, heavy equipment, and the creation of a 4-metre-wide multi-use path accessible to snowplows and garbage trucks—poses serious risks to the peaceful, natural character of our community. I am particularly worried about the increased traffic and noise this will bring to the quiet southeast corner of the beach, which has long been a haven for residents and visitors alike.

There has been little communication with the people who will be most directly affected by this development. Many of us, myself included, were unaware that this project was progressing to the Environmental Assessment phase. The lack of transparency and public consultation is very concerning.

Moreover, this plan would result in the loss of our off-leash dog park and sandy shoreline—spaces that are not only recreational but also essential to the identity and community life of the Beach.

While I fully support efforts to protect the Bluffs from erosion, this must not come at the cost of destroying the very areas we are trying to preserve. There must be a way to separate environmental protection from a major infrastructure project that could permanently alter the character of our neighbourhood.

I urge the Ministry to pause this project and ensure meaningful consultation with residents before any decisions are made.

Thank you for considering my concerns.

Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.

No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.

At this time, nothing has been proposed at Balmy Beach/the Silver Birch Beach Dog Off-Leash Area. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.

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 \(2015\)](#). Where feasible, trails will be made accessible to all users. Trail widths and surface

	<p>material can vary depending on the need, desire, and site conditions.</p> <p>The project team acknowledges the significance of the Silver Birch Beach Dog Off-Leash Area to the community and will consider impacts to this feature as part of the Alternatives development and evaluation process. Please be advised that the City's Parks and Recreation team have recently updated the <a href="#">City's Off-Leash Area strategy</a> that speaks to existing Off-Leash Areas. As Alternatives are developed in the upcoming Environmental Assessment phase, the project team will coordinate with the City's Off-Leash Area program to integrate any state-of-good-repair improvements to the Silver Birch Beach Dog Off-Leash Area into the Scarborough Bluffs West Project.</p> <p>There have been four (4) rounds of outreach, including two (2) rounds of public consultation, with the public since the project commenced in 2023. The Record of Consultation Section 3 contains a summary of the outreach conducted to date.</p> <p>An additional three (3) rounds of public consultation will be held as part of the Environmental Assessment phase, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Section 6 of the Terms of Reference outlines how consultation will be undertaken at each step of the decision-making process.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>
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Comments	Proponent's Response
<p>I live on Warden Ave south of Kingston Rd and I would like to propose several items to be considered for the planning of these works:</p> <ul style="list-style-type: none"> <li>- Erosion control for the bluffs as a whole. Increased vegetation cover and mitigation of loss of land. We live on a sand cliff and would like active mitigation measures so that our neighbourhood does not end up as lakebed material.</li> <li>- Improved access to the waterfront from the Birch Cliff neighbourhood. We are lakefront residents but do not have access to the lake except far to the east or far to the west. Warden and harding are the most likely candidates. This would open up a tremendous amount of recreational opportunities to local residents and visitors.</li> <li>-Bike connections. I bike downtown and back twice a week. The connections up to Silver Bkrch are fine but east of Silver Birch is a patchwork of dangerous on road connections that isolate the east and west segments of the Waterfront Trail. Kingston Rd has no westbound bike lane. Fallingbrook is narrow with parked cars and vehicles speeding up and down to avoid traffic on Kingston with bicycles going slowly uphill. Queen St E in front of RC Harris is probably the most dangerous portion of my ride as it is narrow with parked cars and streetcar turnarounds and stopped trams. Some kind of cycling connection or even a staircase to formal access points along the bluffs trail is essential to allow easy and safe access for all eastern residents to go downtown and beyond.</li> </ul>	<p>Thank you for your suggestions. We will take this feedback into consideration as part of the Alternatives development and evaluation during the Environmental Assessment phase.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

The residents of Henley Gardens want the issue of the Gap solved When residents want to cross the street Their needs to be lights and proper signals This request was presented four years ago And There has been no Response

The purpose of the Scarborough Bluffs West Project is to explore the enhancement and protection of sensitive shoreline and natural areas and opportunities for improved waterfront experience and access between the Eastern Beaches (Silver Birch Avenue) and Bluffer's Park along Lake Ontario. The project will consider opportunities to:

- Improve how people access, move through, and experience the waterfront
- Preserve and enhance the natural environment, including the cultural significance of the Bluffs
- Minimize natural hazards and risks to public safety caused by erosion

Individual street improvements where no trail is proposed are outside the scope of the project. However, we note that no Alternatives, or proposed trail alignments, have been developed at this time; they will be developed during the Environmental Assessment phase for the full Study Area and will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.

Please consider contacting 311 or your local Councillor to further discuss this request.

Comments	Proponent's Response
<p>I am not in agreement with the Scarborough Bluffs West Project: Eastern Beaches to Bluffer's Park. The city of Toronto is too overpopulated and I feel this project will further wear away the area in more ways than one.</p> <p>I do hope time and money can be spent on something else for Scarborough Bluffs West.</p>	<p>The Scarborough waterfront has been the subject of over five decades of planning, studies and analysis seeking to understand stressors on the ecosystem, public access issues, and the nature of public safety and property risks posed by shoreline erosion. There is no formal public access along the shoreline between R.C Harris Water Treatment Plant and Bluffer's Park (approximately 4.5 km) due to generally steep grades, risk to public safety caused by ongoing erosion of the Bluff face, private property, and restricted access associated with critical public infrastructure.</p> <p>As Toronto continues to grow and densify, and areas within Scarborough see more intensification, provision of and equitable access to parks and open spaces are important planning considerations. The Scarborough Bluffs West Project provides an important opportunity to enhance connectivity and access to this large section of open space as an amenity and recreational node to support the health and wellbeing for Toronto residents.</p> <p>This increased demand for access to natural areas also puts pressure on both managed and unmanaged terrestrial areas that are already in limited supply. As a result, the Study Area has been impacted by past and on-going human use. People are already accessing the shoreline via informal paths, often trespassing on private property to do so. This unmanaged use not only impacts the natural environment but also causes public safety issues. This project will explore opportunities to formalize access and use to provide safe and equitable access along the waterfront, while managing public use through the existing sensitive shoreline and natural areas.</p>

Comments	Proponent's Response
<p>I am quite concerned about this project, in particular the access roadway at the bottom of Silver Birch. How this will affect natural wildlife in the area, the waterline, and the Beaches right out to the Bluffs. I am not in favour of this project, as an eastern Beaches resident.</p>	<p>Currently we are in the first phase of the Comprehensive Environmental Assessment process: the Terms of Reference, which outlines the work plan for how the Environmental Assessment will be undertaken.</p> <p>No Alternatives have been developed yet. They will be developed during the Environmental Assessment phase, following approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks. Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>At this time, nothing has been proposed at the bottom of Silver Birch. The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A “Do Nothing” Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>Please note that nowhere in the Terms of Reference 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 <a href="#">City of Toronto's Multi-use Trail Guidelines (2015)</a>. Where feasible, trails will be made accessible to all users. Trail widths and surface material can vary depending on the need, desire, and site conditions.</p>

Comments	Proponent's Response
<p>Please consider to build a bridge between the points</p> <p><i>[submission included a photo of the Project Study Area map with bridge connection between the east end of the Fishleigh shoreline construction access road and the west side of Bluffer's Park]</i></p>	<p>Thank you for your suggestion. We will take this feedback into consideration as part of the Alternatives development and evaluation during the Environmental Assessment phase.</p> <p>The Alternatives that will be developed during the Environmental Assessment phase for the full Study Area will include potential shoreline and top of bluff (tableland) trails, or a combination of both, and potential new and/or enhanced access points, to explore formalizing and managing public use along the waterfront. The Alternatives 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, in addition to addressing slope stability and erosion risk, and enhancing aquatic and terrestrial habitats, where possible. A "Do Nothing" Alternative will also be carried forward at every stage of the Alternatives evaluation process.</p> <p>Once available, Alternatives will be shared for public, agency, Indigenous and stakeholder input.</p> <p>We encourage all feedback and insight, as this will help inform the development and refinement of Alternatives during the Environmental Assessment phase, along with the criteria used to evaluate them.</p>

**Agency Submitters:**

Submitter	Comments	Proponent's Response
Toronto Catholic District School Board (TCDSB)	<p>We support the overall goals of this initiative, including the enhancement of waterfront experiences, protection of sensitive natural features, and mitigation of public safety risks associated with shoreline erosion.</p> <p>TCDSB operates two school properties within or adjacent to the SBW Project Study Area:</p> <ol style="list-style-type: none"> <li>1. St. John Henry Newman Catholic Secondary School</li> <li>2. St. Theresa Shrine Catholic School</li> </ol> <p><b>St. John Henry Newman Catholic Secondary School</b></p> <p>St. John Henry Newman Catholic Secondary School is located at the toe of the Scarborough Bluffs and directly adjacent to the Lake Ontario shoreline. It is within immediate proximity to shoreline protection and slope stabilization works that may be considered in future phases of the SBW Project.</p> <p>Importantly, TCDSB capital staff have received a Notice of Approval with Conditions (NOAC) from the City of Toronto on May 2, 2025 for the rebuild of this school on the existing site. The Board is actively advancing this priority capital project, which will deliver a modernized secondary school facility for the local community.</p>	<p>Thank you for your comments.</p> <p>The City of Toronto and Toronto and Region Conservation Authority are undertaking a Comprehensive Environmental Assessment, which involves two phases and includes significant technical and consultation work. We are currently completing Phase 1: the Terms of Reference, which sets out how the Environmental Assessment will be done. The Terms of Reference is currently undergoing a full government review.</p> <p>Phase 2, the Environmental Assessment, will commence upon approval of the Terms of Reference, anticipated in the first half of 2026. The Comprehensive Environmental Assessment process typically takes about 5 years to complete.</p> <p>Following approval of the Environmental Assessment, detailed design and permitting/approvals processes would be undertaken prior to the start of any construction. At this time, no funding for design or construction has been secured. Given these long-term timelines, we do not anticipate any conflict with the St. John Henry Newman Catholic Secondary School rebuild.</p>

Toronto Catholic District School Board (TCDSB)	<p><b>We emphasize that the Scarborough Bluffs West Project must not cause any further delays or disruptions to the St. John Henry Newman rebuild project.</b></p> <p>To that end, we request:</p> <ul style="list-style-type: none"> <li>confirmation that proposed works under the SBW Environmental Assessment will be coordinated to avoid conflicts or construction staging interference with the school rebuild;</li> <li>early and ongoing engagement with TCDSB on the alignment of any proposed erosion control measures, lakefill or access routes that may impact site access, construction logistics, or site servicing; and</li> <li>clarity on whether any landform modifications or permitting processes stemming from SBW may impact the timing of our planned construction activities.</li> </ul> <p><b>St. Theresa Shrine Catholic School</b></p> <p>Located further inland, St. Theresa Shrine Catholic School is less likely to be directly affected by proposed shoreline works. However, we request that the Environmental Assessment process monitor for potential indirect impacts, including:</p> <ul style="list-style-type: none"> <li>changes to local access or traffic circulation;</li> <li>infrastructure upgrades (e.g., drainage or stormwater systems); and</li> <li>increased recreational or public use in surrounding areas.</li> </ul>	We commit to continued engagement with the Toronto Catholic District School Board throughout the Environmental Assessment phase, including the Alternatives development and evaluation process, to identify any potential property impacts and appropriate mitigation measures, as required.
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Submitter	Comments	Proponent's Response
	<p>We also encourage proactive communication with the Board should any implications arise for this property during the evaluation of alternatives.</p> <p><b>Request for Stakeholder Engagement</b></p> <p>TCDSB requests to be formally included in all future phases of the Environmental Assessment as a key stakeholder. Specifically, we ask to receive:</p> <ul style="list-style-type: none"> <li>• timely updates on project alternatives and designs;</li> <li>• advance notice of construction staging plans; and</li> <li>• opportunities to comment on potential mitigation measures where school sites may be affected.</li> </ul> <p>The TCDSB may identify additional Board properties during the stakeholder engagement process.</p> <p>The TCDSB supports the vision and intent of the Scarborough Bluffs West Project. We offer these comments to ensure that the planning, timing, and delivery of our educational infrastructure — particularly the St. John Henry Newman CSS rebuild — are protected and coordinated with this important shoreline initiative.</p>	

Submitter	Comments	Proponent's Response
Ministry of Environment, Conservation and Parks – Noise and Vibration Unit	Please comment on any potential for noise impacts due to road modifications within the study area.	No Alternatives have been developed yet. However, the only road modifications that may be considered as part of the Alternatives development process during the Environmental Assessment would be the inclusion of adjacent active transportation infrastructure for pedestrians and cyclists. The future Alternatives are not expected to increase vehicular traffic beyond what is already existing and/or projected with continued population increases in the area.

Ministry of Citizenship and Multiculturalism	<p><b>Project Summary</b></p> <p>In the fall of 2023, the City of Toronto, in partnership with the Toronto and Region Conservation Authority (TRCA), initiated a Comprehensive Environmental Assessment to explore options for the renewal of, and improvements to 4.5 kilometres of the Lake Ontario shoreline from Balmy Beach at Silver Birch Avenue to Bluffer's Park in the City of Toronto. It is understood that the project will engage with the public, Indigenous communities, and technical experts, and will inform a plan to enhance the natural landscape and provide safe access to the Lake Ontario waterfront, while protecting sensitive shoreline and natural areas. In July 2024, the City and TRCA made the draft Terms of Reference for the project available for public review and comment.</p> <p>In August 2024, MCM commented on the Scarborough Bluffs West Revitalization Study – Environmental Terms of Reference – DRAFT to the TRCA. On October 4, 2024 the proponent responded to MCM's August 2024 comments, attaching the associated revisions to the document. MCM replied to the TRCA's response table on November 26, 2024. On July 20, 2025, the TRCA and the City of Toronto submitted the proposed Terms of Reference (ToR) for the Scarborough Bluffs West Project (formally the <i>Scarborough Bluffs West Revitalization Study</i>) to the Ministry of the Environment, Conservation, and Parks' (MECP) for review.</p> <p><b>Comments</b></p> <p>MCM provided comments on the Draft Terms of Reference on August 6, 2024. We have reviewed the <i>Scarborough Bluffs West Project – Environmental Assessment Terms of Reference</i> (dated June 2025 and prepared by City of Toronto and TRCA) and have the following comments:</p> <p>While Section 5.3.7.2 identifies twelve properties that are designated under the Ontario Heritage Act and/or listed on</p>	<p>A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment will be undertaken as a part of the Environmental Assessment to further screen for potential built heritage resources or cultural heritage landscapes situated in or adjacent to the Project Study Area, following the development of Alternatives.</p>
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	<p>the City of Toronto's Municipal Heritage Register, there is no discussion of potential built heritage resources or cultural heritage landscapes that could be situated in or adjacent to the study area. The response table provided by the TRCA on October 4, 2024, indicates that most of the project activities are anticipated to take place along the shore and within public parks and open space, and that therefore, the project team anticipates that no additional resources will be identified.</p> <p>In MCM's November 26, 2024 reply to the TRCA's response table, MCM recommended that the ToR be updated to both indicate that further screening will be undertaken, once alternatives have been selected, and to clearly outline the process the screening will follow, further recommending the completion of a <i>Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment</i>.</p> <p>MCM notes that a description of the existing environment and potential effects of the undertaking must address all components of the environment as defined under the <i>Environmental Assessment Act</i>. This includes a description of the cultural component of the environment. The ToR should list and explain the tools (studies, tests, surveys, mapping) that will be used to provide a more detailed description of the environment, as recommended in <i>Preparing and reviewing terms of reference for environmental assessments in Ontario, MECP</i>.</p> <p>Section 5.3.7.2 of the ToR indicates that there is potential for Built Heritage Resources and/or Cultural Heritage Landscapes. Therefore, MCM continues to recommend that a description of technical cultural heritage studies be included in this section to make clear the method and documentation by which potential built heritage resources</p>	
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Submitter	Comments	Proponent's Response
	<p>and cultural heritage landscapes will be identified and potential impacts/effects of the undertaking assessed.</p> <p>To summarize, MCM recommends that the proponent revise the ToR to confirm that a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment will be undertaken as a part of the environmental assessment.</p> <p>To support due diligence, we have attached a commenting table below to track MCM's engagement and document any modifications to the ToR.</p> <p>Thank you for consulting MCM on this project and please continue to do so throughout the EA process. If you have any questions or require clarification, please do not hesitate to contact me.</p>	
Ministry of Natural Resources	<p>MNR submitted comments on the draft Terms of Reference to the Toronto Region Conservation Authority (TRCA) on May 2, 2025, and we appreciate the responses to our comments by way of 'Table A-2: The Summary Disposition of Agency Comments.' We recognize that 'Table E-1: The Proposed Terms of Reference Commitments Table' encapsulates several of our ministry's suggestions to ensure that impacts and mitigation measures related to MNR policy areas of interest including ANSIs and fish habitat, will be considered during the EA process. We would direct TRCA and the City of Toronto to our comments submitted on May 2, 2025, for further consideration regarding MNR interests related to this project to inform preparation of the EA.</p>	<p>Comment noted. The project team will reference MNR's comments from May 2, 2025 to further inform preparation of the Environmental Assessment document, with the recommended material being included in the description of the environment (baseline conditions) and/or considered as part of the Alternatives development and evaluation process.</p>

Submitter	Comments	Proponent's Response
	<p>Also, MNR would encourage TRCA to consider potential implications concerning the petroleum well identified by MNR adjacent to the subject lands. It is important to note that, as indicated in our May 2 comments, MNR's information on this well does not include the exact location of the well. As such, MNR has concerns that if this location data and other well data is not considered in the EA process, that may result in potential human-made hazards. To learn more about potential hazards associated with oil and gas wells, please visit <a href="http://Oil and gas   ontario.ca">Oil and gas   ontario.ca</a>.</p> <p>Lastly, we encourage TRCA to update their vegetation community data based on the Ecological Land Classification system, particularly in project segments and areas where potential impacts related to trails, shoreline improvements and other measures which may be considered in the evaluation of alternatives.</p>	<p>The project team will further investigate the petroleum well and its location through the Environmental Assessment process to confirm potential impacts as part of the Alternatives development and evaluation process.</p>
Hydro One Networks Inc.	<p>Thank you for sending us notification regarding Scarborough Bluffs West Project: Eastern Beaches to Bluffer's Park. In our assessment, we confirm there are no existing Hydro One Transmission assets in the subject area.</p> <p>If plans for the undertaking change or the study area expands beyond that shown, please contact Hydro One to assess impacts of existing or future planned electricity infrastructure. Any future communications are sent to <a href="mailto:Secondarylanduse@hydroone.com">Secondarylanduse@hydroone.com</a>.</p> <p>Be advised that any changes to lot grading and/or drainage within proximity to Hydro One transmission corridor lands must be controlled and directed away from the transmission corridor.</p>	<p>Comment noted. Should there be any changes to the proposed Study Area boundaries during the Environmental Assessment, Hydro One will be notified for reassessment of impacts.</p>

Submitter	Comments	Proponent's Response
Roman Catholic Episcopal Corporation	<p>The Roman Catholic Episcopal Corporation for the Diocese of Toronto, in Canada (“<b>RCEC</b>”), appreciates the opportunity to comment on the proposed Terms of Reference for the Scarborough Bluffs West Project (“<b>SBW</b>”), submitted by the Toronto and Region Conservation Authority (“<b>TRCA</b>”), in partnership with the City of Toronto. RCEC supports the overall goals of this initiative, including the enhancement of waterfront experiences, protection of sensitive natural features, and mitigation of public safety risks associated with shoreline erosion.</p>	Comment noted.
	<p><b><u>RCEC Properties</u></b></p> <p>RCEC owns properties within the SBW Project Study Area, including:</p> <ol style="list-style-type: none"> <li>1. St. Augustine’s Seminary, at 2661 Kingston Road; and</li> <li>2. St. Theresa’s Parish, at 2559 Kingston Road;</li> </ol> <p>These properties are located near the eastern boundary of the SBW Project Study Area. In particular, the St. Augustine’s Seminary property is within immediate proximity to the Lake Ontario shoreline and the potential area for shoreline protection and slope stabilization works that may be considered in future phases of the SBW Project.</p> <p>RCEC may identify additional properties during the stakeholder engagement process.</p>	Comment noted.

Submitter	Comments	Proponent's Response
	<p><b><u>Request for Stakeholder Engagement</u></b></p> <p>RCEC requests early and ongoing engagement with the project team in the Environmental Assessment process, including during the evaluation of “Alternatives to” the project. RCEC asks that it be formally engaged in the consideration of the alignment of any proposed erosion control measures, lakefill, or access routes that may impact site access, construction logistics, or site servicing for its properties.</p> <p>RCEC further requests clarity on whether any proposed landform modifications or changes to permitting processes may impact development within the SBW Project Study Area. RCEC would appreciate advance notice of any construction activities related to the SBW Project that are anticipated to occur in close proximity to any RCEC properties.</p>	<p>The project team commits to early and ongoing engagement with Roman Catholic Episcopal Corporation, including during the development and evaluation of Alternatives.</p>

Submitter	Comments	Proponent's Response
	<p><b>Conclusion</b></p> <p>RCEC supports the vision and intent of the SBW Project. We offer these comments to ensure that the planning, timing, and phasing of the SBW Project minimizes potential impacts to RCEC and the local communities it serves and supports.</p> <p>RCEC appreciates timely updates regarding the identification of project alternatives and designs and the opportunity to comment on potential mitigation measures where RCEC properties may be impacted.</p> <p>We request notification of any modifications, community consultations, appeals or notices of decision relating to this project. Please direct correspondence to [REDACTED].</p>	Comment noted.

#### Indigenous Submitters:

Submitter	Comments	Proponent's Response
Six Nations of the Grand River	<p>We have a big problem with the city of Toronto, as they've persistently refused to provide EA capacity funding, contrary to MECP's guidance about "bearing the reasonable costs associated with these consultation opportunities". Toronto previously asked for our patience, saying they need a new internal policy to do so, but years have passed and enough is enough.</p> <p>Please direct Toronto to start providing such capacity funding so we can be meaningfully involved in its EAs.</p>	The City of Toronto is not authorized to execute a capacity funding agreement with the Six Nations of the Grand River relating to review of distributed project related materials to date as it does not have a policy in place.

<b>Submitter</b>	<b>Comments</b>	<b>Proponent's Response</b>
Mississaugas of the Credit First Nation	<p>It would be beneficial to identify possible cumulative impacts as part of evaluating the alternatives rather than only flagging it as one of the potential impacts of the project.</p> <p>What are the rough timelines/ phases for this project?</p>	<p>Cumulative impacts of the Preferred Alternative will be evaluated in the Environmental Assessment phase.</p> <p>The City of Toronto and Toronto and Region Conservation Authority are undertaking a Comprehensive Environmental Assessment which involves two phases and includes significant technical and consultation work. It also includes a full provincial government review of the Terms of Reference (Phase 1) for approximately 6 months, and of the Environmental Assessment document (Phase 2) for approximately 12 months. Comprehensive Environmental Assessments typically take about five years to prepare and approve.</p> <p>We are currently in Phase 1 and have started the 6-month provincial government review of the Terms of Reference. It is anticipated that the Environmental Assessment phase will begin in the first half of 2026, pending approval of the Terms of Reference by the Ministry of Environment, Conservation and Parks.</p>