

APPENDIX C1.7 – Consultation Record

APPENDIX E – Comments/Responses During Draft EA Review

Notice of Public Review

Teston Road Area Improvements

Individual Environmental Assessment Study

The Regional Municipality of York is completing an Individual Environmental Assessment (IEA) Study in the City of Vaughan to identify road improvements in the Teston Road area from Highway 400 to Bathurst Street and from Major Mackenzie Drive West to Kirby Road.

As required under the *Ontario Environmental Assessment Act*, York Region is releasing the draft IEA Study Report for public review.

THE STUDY

To address transportation challenges in the area, the study considered improvements for vehicles, pedestrians, cyclists and transit. Consultation with interested and/or affected parties is an essential part of the planning process and allows for identification and response to issues before decisions are made.

The draft IEA Report will be available for review and comment from November 8, 2024 to December 22, 2024 at york.ca/TestonRoad

The Teston Road IEA Study will be submitted to the Ministry of the Environment, Conservation and Parks for review and approval following the public review period.

Please let us know if you require accommodations to participate. Online materials and an accessible version of this notice are available upon request.

This study is being carried out according to the approved Terms of Reference and the requirements of the *Ontario Environmental Assessment Act*. Personal information submitted (e.g. name, address and phone number) is collected, maintained and disclosed under the authority of the *Ontario Environmental Assessment Act* and the *Municipal Freedom of Information and Protection of Privacy Act* for transparency and consultation purposes. Personal information you submit will become part of the public record that is available to the general public, unless you request that your personal information remain confidential.

This notice was issued on November 7, 2024.

Wayne Emmerson
York Region Chairman and CEO

CONTACT US

To submit a question, comment or request to be added to the project mailing list, please contact us using a method below. To better assist you, please quote 'Teston Road IEA' in your inquiry.



APPENDIX E-1 – City of Toronto

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Date: January 31, 2025

To: Teston Road IEA Study Team
From: Lynda Mulcahy, Manager Closed Landfill Operations, City of Toronto
Re: Teston Road draft Individual Environmental Assessment (IEA) report comments

The City of Toronto (Toronto) appreciates the consultation process by the IEA team, and this opportunity to provide comment on the draft IEA report. Toronto recognizes the importance of this IEA project and also the sensitivity and complexity of certain locations within the proposed project area. Toronto therefore completed a detailed review of the draft IEA report.

If the existing conditions or the project description are not effectively represented, the robustness of the effects evaluation is biased and the recommended Mitigation Measures and Commitments to Future Work will also be inherently flawed.

Substantial misrepresentations and inconsistencies in the Draft IEA Report have been identified by the Toronto. These have been summarized in Comment Response Table 1 in Attachment A. The conclusions of supporting studies conflict with statements made in the executive summary, project description and effects evaluation. Toronto is requesting a commitment of the authors to provide clarification and supplemental information prior to the finalization of this Draft IEA Report.

Toronto would like to request that MECP require Toronto's sign off on responses from the Region of York and/or supplemental information provided.

With respect to the structure and completeness of the IEA Report, Toronto identifies critical conflicts or misinformation in the following sections. Details and further comments are contained in the Comment Response Table 1 in Attachment A.

Consultation

Toronto, along with its consultants, met to convey concerns to the York Region IEA Project Team regarding due consideration of the Keele Valley Landfill gas infrastructure. During these meetings information on the potential hazards associated with working near closed landfills, including the potential for landfill gas to be present in the subsurface were conveyed. Omitted from the consultation record (i.e., missing from Appendix C6) was the November 29, 2023 meeting between the York Region IEA Project Team, Toronto, WSP Canada Inc. and GHD Limited regarding landfill gas, hazards associated with landfill gas, and existing control and monitoring infrastructure.

Description of the Environment (Existing Conditions)

- a) Toronto requests that the proponent undertake a legal review of the land boundaries and covenants on lands within and adjacent to the Alternative Alignment option 4E, Section 2. The existing conditions assessments is incomplete with respect to ownership and encumbrances.
- b) The Approved Terms of Reference (Page 25) references Ministry of Environment Conservation and Park (MECP) D-4 Land Use On or Near Landfills and Dumps (1994). The D-4 Guideline is a tool for proposed projects to use when proposing works near existing and closed landfills. Project proponents, including undertakings subject to the Environmental Assessment Act, are expected to apply the D-4 guideline. To facilitate review of the Draft IEA, the project proponent should provide a summarizing document or section in the IEA Draft Report demonstrating how the proposed project meets the D-4 Guideline for each of the three landfills sites. This assessment should include technical reports prepared by qualified individuals which summarize the existing conditions of each landfill.
- c) Mention of several Keele Valley Landfill gas management infrastructure was omitted from the existing conditions presented in the Draft IEA Report as further detailed in comments provided in Table 1. The Draft IEA Report lacks information (e.g., cross-sections with sufficient detail) to determine if the omitted landfill gas infrastructure will be impacted by the transportation corridor project. On this basis, the Draft IEA Report has not fully evaluated the impact of the transportation corridor on the Keele Valley Landfill.

Preferred Alternative Alignment 4E (Project Description)

The project description of the Preferred Alternative Alignment (4E) does not convey the technical and regulatory challenges, which pose real risk to the project. This was conveyed to the proponent in response comments on August 16, 2021 following the first open house.

- a) The evaluation of the Preferred Alternative Alignment did not include an assessment of property boundaries and encumbrances at the Keele Valley Landfill Site. This incomplete assessment may impact the evaluation of the Preferred Alternative Alignment from the Alternatives to the Project. Toronto requests that the proponent undertake a legal review of the land boundaries and covenants on lands within and adjacent to the Alternative Alignment Option 4E, Section 2. Toronto is likewise initiating a legal review for the benefit of all parties. Toronto directs the proponent to legal plans and covenants in Attachment 2, described below:
 - i) The western portion of Teston Road through proposed Section 2 was closed on October 29, 1981 By-Law 256-81 (instrument R283130). Toronto requests the proponent to confirm the reason for the road closure is no longer valid.
 - ii) Toronto requests the proponent to identify and confirm that Area 1 on Schedule 1 in the attached 1988 Joint Board Hearing for the Keele Valley Landfill is excluded from the proposed transportation corridor project.
 - iii) An Easement agreement between the Town of Vaughan and Metropolitan Toronto were established in 1983 for Areas identified in Schedule E and F of Instrument R320409 Clause 3(6) and 4(1). Toronto requests that the proponent confirm areas of Parts 6, 9, 51 and Parts 8 and 53 on Reference Plan 65R-5832 are excluded from the proposed transportation corridor project.

- iv) A transfer agreement between the City of Vaughan and Metropolitan Toronto for Part 9 and 10 of Reference Plan 65R-5832 was established in 1996 by Instrument R675034. The City of Toronto requests that the proponent confirm that these areas are excluded in the proposed transportation corridor project.

Based on the above information it is Toronto's understanding that the road allowance along the eastern portion of Alternative Alignment Option 4E, Section 2 is 66ft (20m; one chain) width and has been since first surveyed in 1820.

- b) The evaluation of the Preferred Alternative Alignment did not include an assessment of the regulatory framework governing the Keele Valley Landfill Site. This incomplete assessment may impact the evaluation of the Preferred Alternative Alignment from the Alternatives to the Project. The amendments to the ECA for the Keele Valley Landfill are complex and are submitted with intentionality, supporting technical investigations and strong rationale. Minor administrative amendments to the ECA, which do not involve landfill infrastructure or changes to the approved monitoring program have recently taken up to 2 years to obtain approval through the Ministry of the Environment, Conservation and Parks (MECP). The Draft IEA describes at least six major infrastructure, property, access or monitoring program alterations that would trigger amendments to the ECA for the Keele Valley Landfill Site. The timeline for applying for and obtaining the amendments described in the Draft IEA could be on the scale of decades. There is no guarantee of approval. The Draft IEA report distorts and oversimplifies the rigorous process of altering approved works by means of amendments to the ECA. The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report. The overall approvability of the Preferred Alternative Alignment (4E) was not adequately captured in the Project Description.
- c) The project proponent should identify how continued operation of landfill control systems during the road construction and post-construction period of the transportation corridor will be maintained to ensure compliance with site ECAs for the Keele Valley Landfill Site, and provides secure means to protect the landfill infrastructure, and provides ample maintenance access if repair or replacement of the infrastructure is required. Deferring coordination of the monitoring infrastructure and underground infrastructure servicing the landfills may also impact the evaluation of the preferred alternative.
- d) Deferring delineation of waste and coordination to the detailed design period may impact the evaluation of preferred alternative.
- e) The reasonable potential for landfill gas to be within the Preferred Alternative Alignment (4E) transportation corridor was not consistently acknowledged within the Draft IEA Report as further detailed in comments provided in Table 1. For clarity and to inform subsequent comments we provide the following general overview of landfill gas and general hazards for subsurface projects near landfills:
- Landfill gas results from the decomposition of refuse and is primarily composed of 45 to 60 percent methane and 40 to 60 percent carbon dioxide, and trace gases including mercaptans, hydrocarbons, solvents, water vapour, and hydrogen sulfide.
 - Methane is explosive in concentrations between 5 and 15 percent by volume in air. Methane, carbon dioxide, and nitrogen are simple asphyxiants.
 - Trace gases in landfill gas may be toxic and odourous.
 - Landfill/methane gas may be present during excavations on the subsurface in the vicinity of landfills.

- Landfill gas may migrate along existing or new preferential pathways created during construction/maintenance work in the vicinity of landfills. The pathways for landfill gas to migrate in the subsurface may change over time (e.g., changes in groundwater levels).

General hazards associated with subsurface projects near closed landfills include the following:

- there is the potential for landfill gas to be present in the subsurface during construction and post-construction maintenance event;
- utilities, utility trenches, and/or conduits may create new preferential pathways for landfill gas migration in the subsurface, including to structures or electrical equipment;
- infrastructure installed in the subsurface may create new structures or spaces where landfill gas could accumulate;
- material that has the potential to generate methane gas may exist outside a suspected limit of waste for a closed landfill; and,
- landfill gas control systems may not always be in operation at landfills (e.g. maintenance, power failure, etc.).

Due to the lack of consistent acknowledgement of the potential for landfill gas to be within the transportation corridor it is not clear if the impact of changes to the subsurface soil gas conditions imposed by the Preferred Alternative Alignment option (4E) have been evaluated and adequately mitigated in the Draft IEA Report. Additionally, the proposed Preferred Alternative Alignment has been identified as having impacts to the Vaughan Landfill gas collection system, which in turn has the potential to impact soil gas conditions in and south of the transportation corridor (e.g. north side of Keele Valley Landfill). This potential impact to the Keele Valley Landfill has not been identified nor mitigated in the Draft IEA Report.

- f) The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9).” as well as property lines, topographical features, above grade and below grade landfill infrastructure.

Effects Assessment, Mitigation and Commitment to Future Work

- a) The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer Commitment to Future Works that would alter the approved technical controls or the compliance monitoring program. The project proponent offers Commitments that have not yet been discussed in sufficient detail with Toronto. Toronto cannot guarantee any additional financial regulatory or administrative burden to meet the proponent's Commitment to Future Work. The project proponent should include MECP concurrence with any Commitment to Future work that proposes changes to landfill infrastructure in the IEA Report. Approved current landfill infrastructure and monitoring instrumentation for performance and compliance monitoring was placed with intentionality following the completion of technical investigations, interpretation and reporting. With respect to landfill gas, leachate collection and groundwater monitoring infrastructure (including purge wells), some basic proposed design changes and review could have been provided by

this stage in the IEA process. Toronto cannot comment on the ability to maintain compliance with the approved ECA until this information is completed, submitted and reviewed.

- b) The proponent has not put forth alternative options for management of the Teston Road Purge Well system and the environmental compliance monitoring of the Main Plume emanating from the Vaughan Landfill.
- c) Toronto has not been provided enough information to confirm the validity of several key statements and conclusions of the Draft IEA Report. Until further information is provided, Toronto cannot assess if the proposed Commitments to Future Works will impact affect the ability for Toronto to maintain compliance with the approved Environmental Compliance Approval for the Keele Valley Landfill Site.

Closure

With respect to existing conditions, in undertaking the review of the Draft IEA, Toronto has determined that existing conditions have not been effectively represented.

With respect to the evaluation of the Preferred Alternative Alignment (Project Description), the evaluation of the Preferred Alternative Alignment may be impacted by the following:

- the incomplete assessment of options with respect to site boundaries and regulatory framework;
- the incomplete assessment of options with respect to landfill infrastructure; and,
- the omission of the health and safety hazard associated with the potential for landfill gas to be present in the proposed transportation corridor.

The impact of these incomplete assessments and omissions to the overall evaluation of Alternates to the Project should be considered.

With respect to the evaluation, Toronto disagrees with several of the significant ratings in the effects evaluation. In many cases, the proposed mitigation listed excludes or do not address the listed effect.

If the effects and significance rating are prejudiced, then the proposed mitigation measures and Commitment to Future Works are also biased and likely to be incomplete.

With respect to Commitments to Future Work, Toronto has not been provided enough information to confirm the validity of several key statements and conclusions of the Draft IEA Report. Therefore, Toronto cannot adequately assess if the Commitments to Future Work provide will provide assurance that adequately captures the risk of the project to Toronto's ability to maintain compliance with its ECA.

Toronto requests a formal response from York Region on its comments on the draft IEA Report.

Toronto requests a meeting with York region to discuss the comments.

Toronto would like to request the MECP require Toronto's sign off on responses from York Region and/or supplemental information provided.

Yours truly,



Lynda Mulcahy
Manager, Closed Landfill Operations
Solid Waste Management Services

LM/lm

Copy to:

Neil Brown, Director (A) Transfer Stations and Landfill Operations, City of Toronto
Praveen John, Project Manager, York Region
Andrea Brown, District Engineer, Ministry of Environment Conservation and Parks
Tracy Meldrum, Lead, Senior Hydrogeologist, WSP

Attachments:

Attachment A: "Table 1: City of Toronto Comments Draft Individual Environmental Assessment for the Teston Road Area Transportation Improvements, Highway 400 & Bathurst Street"

Attachment B: Property boundary and land use related Instruments

ATTACHMENT A

**Table 1: City of Toronto Comments
Draft Individual Environmental
Assessment for the Teston Road
Area Transportation Improvements,
Highway 400 & Bathurst Street**

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Report: Draft Report Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street;

Primary Author: Morrison Hershfield (MH); **Proponent:** York Region (YR)

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
City of Toronto				
1.	Executive Summary – General	<p>The Executive Summary (and generally the Draft IEA Report) does not acknowledge the potential for landfill gas to be present in the transportation corridor in the vicinity of the 3 closed landfills, and by extension, has not considered this health and safety hazard in the evaluation of options (evaluation of preferred option) for the project.</p>	<p>The project proponent should edit and reconcile the evaluation of options presented in the Draft IEA Report, including the Executive Summary, to acknowledge the potential for landfill gas to be present in the transportation corridor and the associated health and safety hazards, both during the construction period and after the road corridor has been placed into service.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the omission of the health and safety hazard associated with the potential for landfill gas to be present in the proposed transportation corridor. The impact of the omission to the overall evaluation of Alternates to the Project should be considered.</p>	
2.	Executive Summary – Recommendations – Soil/Contamination/Landfills, Page XXVI	<p>The author states <i>“Given the proximity of landfills and the associated monitoring infrastructure along a portion of the project, further coordination will occur throughout detailed design to ensure compliance with, or amendment to, existing approvals and to delineate underground infrastructure and address the potential for landfill waste to be present within the proposed right-of-way.”</i></p> <p>Comment: The potential for landfill gas to be present in the right-of-way / transportation corridor is omitted from mention of the potential for landfill waste to be present.</p> <p>If waste associated with a known municipal solid waste landfill (e.g., Vaughan Landfill) is suspected to be within the limits of the project, there should be no doubt about the need to consider the potential for landfill gas to be likewise present. Deferring delineation of waste and coordination to the detailed design period may impact the evaluation of preferred alternative.</p> <p>Deferring coordination of the monitoring infrastructure and underground infrastructure servicing the landfills may also impact the evaluation of the preferred alternative.</p>	<p>The project proponent should edit and reconcile this omission throughout the report.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the deferred delineation of waste and the incomplete assessment of options with respect to landfill infrastructure. The impact of the omission to the overall evaluation of Alternatives to the Project should be considered.</p>	

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
3.	Executive Summary – Recommendations – Soil/Contamination/Landfills, Page XXVI	<p>The author states “<i>The project will not impede the operation of the Keele Valley Landfill, its monitoring programs/requirements, or access to its infrastructure (including underground infrastructure).</i>”</p> <p>Comment: This statement does not appear to reflect the contents of the Draft IEA Report, including its supporting documents. There are several instances of noted conflicts within Section 5 – Existing Conditions; Section 9- Project Description; and Section 10 – Effects Assessment with respect to the above statement. To reasonably make this statement, it should be confirmed that existing landfill-waste limits and the supporting infrastructure are sufficiently set-back from the proposed right-of-way work-limits.</p>	The project proponent should edit and reconcile these conflicts throughout the report.	
4.	Executive Summary – Consultation - Issues Arising from Consultation – Landfills, Page XXIX	<p>The author states “<i>The ultimate Recommended Plan respects all York Region policies and a 36.0 m right-of-way, however, an interim design has been created to eliminate impacts to the landfills.</i>”</p> <p>Comment: The wider Recommended Plan appears to be the long-term plan for the transportation corridor in the vicinity of the landfills. This wider right-of-way (to the full road allowance, 36.0m) will increase the impact to the Keele Valley Landfill, including impact to accessibility of the landfill monitoring and control infrastructure. The wider right-of way appears to occupy the primary buffer area of the Keele Valley Landfill Site as defined in the Environmental Compliance Approval. The header pipe for the landfill gas collection system is located within the apparent proposed Recommended Plan road allowance. Clarity is required on the proposed timeline for the implementation of the Recommended Plan.</p> <p>Even with the narrower constrained interim cross-section (approximately 23.0m), encroachment into the landfill buffer area is probable. The primary buffer area will remain essential for operational support of the Keele Valley Landfill for the foreseeable future, specifically beyond 2050. Further the Draft IEA Report Section 8.3.3., following Table 8-2, states “<i>the full-width cross-section would not be implemented until such time as the landfill monitoring and various leachate and gas controls are no longer required and have been decommissioned. There is currently no timeline for decommissioning.</i>”</p> <p>This statement is reasonable, but is not accurately reflected in the Executive Summary and other areas of the documents. The statement that the interim plan will “eliminate</p>	<p>The project proponent should clarify in the Executive Summary the expected timeline for the wider ultimate Recommended Plan that will occupy the north primary buffer area for the Keele Valley Landfill.</p> <p>The project proponent should confirm that the wider ultimate Recommended Plan implementation timeline aligns with the end of anticipated service life of the control systems for the Keele Valley Landfill.</p> <p>The project proponent should edit and reconcile the statement that the interim plan will eliminate impacts to landfills.</p>	

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Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
		impacts to landfills” is not consistent with the detailed assessments within the Draft IEA Report as previously noted.		
5.	Section 3 – Consultation; Section Agency & Municipal Consultation; Table 3-6; Page 29	<p>The author includes on the meeting entry for February 15, 2022 Bullet 3 that “<i>Road salt may cause issues during landfill leachate testing.</i>” is incorrectly summarized in both Table 3-6 and consultation record in Appendix C.6.</p> <p>Clarification: The Vaughan Landfill does not have a liner for which leachate could be collected and conveyed. Therefore, leachate is not sampled from the Vaughan landfill and landfill leachate testing is not completed for the Vaughan landfill. Landfill leachate impacted groundwater from the unlined Vaughan Landfill has created a plume which emanates from the Vaughan Landfill and travels underneath the lined Keele Valley Landfill Site. Sodium and chloride are both landfill leachate indicator parameters (among others) that are used to characterize and delineated the groundwater plume from the Vaughan Landfill. Road salt impacted surface water infiltrating in the vicinity of this groundwater plume exists may confound the ability to continue to effectively monitor the status of the plume.</p>	The project proponent should correct and clarify the text.	
6.	Section 3 – Consultation; Section Agency & Municipal Consultation; Table 3-6; Page 29	<p>The consultation record of “Update Meeting OH#4” is incorrect. The EA team requested a meeting with City of Toronto regarding the bridge design options and abutments.</p> <p>Comment: The City of Toronto noted that in both preliminary design scenarios fill would be placed on private property limiting access to the northeast monitoring well locations at the Keele Valley Landfill Site.</p> <p>At October 2023 meeting, the potential presence of landfill gas in the project corridor was identified and City of Toronto asked if the project team had landfill subject matter experts involved in the EA. It was restated that if Landfill Gas was not considered in the EA process, it may affect the constructability off the project. It was suggested that a follow up meeting with YR, MH the City of Toronto’s Landfill Gas experts be arranged.</p>	The project proponent should revise the meeting title.	
7.	Section 3 – Consultation; Section Agency & Municipal Consultation; Table 3-6; Page 29	<p>The consultation record with the City of Toronto is missing a meeting host by York Region with respect to Landfill Gas potential held on November 29, 2023. Following the October 2023 meeting a follow up meeting was scheduled by the Region of York to include with City of Toronto, WSP Canada Inc. (WSP), and GHD Limited (GHD). This meeting was held on November 29, 2023.</p> <p>Comment: GHD presented information on landfill gas generation, mobility and considerations for design. WSP provided information on the construction details of the Teston Road Purge Well System. The presentation slides from GHD and selected</p>	The project proponent should update the consultation record to include the November 29, 2023 meeting.	

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Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
		borehole logs from the Teston Road Purge Well System were provided to York Region on December 22, 2023. Correspondence record attached to this table.		
8.	Section 5 – Existing Conditions; Section 5.3.5.5 Groundwater Page 107 to Appendix L -- Hydrogeology Report Section 3.4 Hydrogeology	The authors provide a summary of regional scale hydrogeology on page 7; however, the two 2018 Golder reports referenced on page 12 identify and offer a more detailed description of the local hydrostratigraphy. The local aquifer names and thickness would be more appropriately described for this section of the proposed project.	The project proponent should expand this section to clarify the text.	
9.	Section 5 – Existing Conditions; Section 5.3.5.5 Groundwater Page 107 to Appendix L - Hydrogeology Report Section 3.4 Hydrogeology Page 13	The author states <i>“The chloride concentrations were determined to be within the Ontario Drinking Water Standards.”</i> Comment: The Keele Valley Landfill Site has approved site-specific groundwater compliance criteria.	The project proponent should be aware there are site specific criteria site boundary and triggers for groundwater compliance.	
10.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill; Page 152	The author states <i>“The Keele Valley Landfill operates under a Certificate of Approval (CoA) and is subject to the CoA, as well as requirements under Section 46 of the Environmental Protection Act and the Ministry of Environment, Conservation and Parks (MECP) D-4 Guideline: Land Use On or Near Landfills and Dumps (1994).”</i> Clarification: The Keele Valley Landfill Site does not operate under, nor is it subject to requirements of the MECP’s D-4 Guideline. The D-4 Guideline is a tool for proposed projects to use when proposing works near landfills. Project proponents are expected to implement the D-4 guideline and demonstrate how the project meets the guidance (including undertakings subject to the Environmental Assessment Act).	The project proponent should provide a summarizing document or section in the IEA report containing information demonstrating how the MECP D-4 guidance is met.	
11.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill;	The author states <i>“Per Section 5.2.2 of the D-4 Guideline, no land use may take place within 30 m of the perimeter of the fill area of a non-operating site where technical controls for leachate are required.”</i>	The project proponent should provide the City of Toronto with a series of figures in plan view and cross section indicating the	

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Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
	Page 153	Comment: The guideline “specifies restrictions and controls on land use that the Ministry wishes to see implemented in the vicinity of landfills and dumps, in order to protect the health, safety, convenience and welfare of residents near such facilities. It complements existing ministry abatement programs for landfills and dumps, and is a direct application of Guideline D-1: "Land Use Compatibility." Application of the guideline extends to all proposals for land use on, or near, operating and non-operating landfills, (as defined in O. Reg. 347) and dumps which contain municipal solid waste, industrial solid waste and/or sewage sludges. The guideline applies to all such facilities regardless of ownership.”	location of the technical controls and 30 m buffer zone identified in the MECP D-4 Guideline.	
12.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill; Page 153	<p>The author states “<i>As the IEA progresses, further discussions with the City of Toronto (currently own and maintain the Keele Valley Landfill) will be required to delineate the site boundaries, determine limitations of the CoA, and request input to the alternatives.</i>”</p> <p>Comment: The City of Toronto has not been provided sufficient consultation from the proponent on the topics of site boundaries and regulatory compliance. This was identified as a requirement for meaningful participation in this process through comments submitted in August 2021 following the first open house.</p> <p>The proponent should delineate the site boundaries, establish ownership, easements, land use covenants and prepare a series of to scale drawings to reconcile and confirm project boundaries.</p> <p>The proponent should clarify what is meant by “determine limitations of the CoA”.</p>	<p>The evaluation of the Preferred Alternative Alignment may be impacted by the incomplete assessment of options with respect to site boundaries and regulatory framework. The impact of the incomplete assessment to the overall evaluation of Alternates to the Project should be considered.</p> <p>The City of Toronto requests that this be a future commitment prior to finalization of the Draft IEA.</p>	
13.	Section 5 – Existing Conditions; Section 5.6.12.1.2 (Keele Valley Landfill) Landfill Infrastructure, Page 153	<p>The author states “<i>The gas is used to power a 30 megawatt electrical generation plant that is located south of landfill.</i>”</p> <p>Comment: There is no longer a landfill gas generation system at the Keele Valley Landfill. It ceased operation in 2015 and has since been demolished.</p>	The project proponent should correct the text.	
14.	Section 5 – Existing Conditions; Section 5.6.12.1.2 (Keele Valley Landfill) Landfill Infrastructure,	The author includes a summary of landfill infrastructure following the statement “ <i>A summary of the landfill infrastructure includes: ...</i> ”	<p>The project proponent should correct and clarify the text.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the incomplete assessment with respect to landfill infrastructure. The impact of the incomplete assessment to the</p>	

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Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
	<p>Page 153</p> <p>To</p> <p>Appendix L - Hydrogeology Report Section 3.4 Hydrogeology Page 13</p>	<p>Comment: The evaluation of the Preferred Alternative may be impacted by the incomplete or inaccurate description of the existing landfill infrastructure. The following clarifications are provided to the description of the landfill infrastructure:</p> <ul style="list-style-type: none"> - Landfill gas collection system maintenance chambers are around the perimeter of the fill area. The chambers for the LFG collection system are generally located on the east and west sides of the fill area. - The landfill gas header encompasses the limit of waste perimeter, including on the north side of the Keele Valley Landfill site near to the current north fence line. - Maintenance holes and valve chambers for the landfill gas header in the northern portion of the site, including near the current north site fence line. - Soil gas monitoring probes near the property boundary /fence line of the Keele Valley Landfill. <p>Similar landfill infrastructure may be present around the boundary of the Vaughan Landfill located along the north boundary of the proposed right-of-way.</p>	<p>overall evaluation of Alternates to the Project should be considered.</p>	
15.	<p>5.6.12.1.2 (Keele Valley Landfill) Landfill Infrastructure, Page 153</p> <p>To</p> <p>Appendix L - Hydrogeology Report Section 3.4 Hydrogeology Page 14</p>	<p>The author states "<i>The Southern Purge Well System (SPWS) is operated by the City of Toronto and consists of three (3) purge wells.</i>"</p> <p>Correction: This is incorrect. The Southern Purge Well Systems is comprised of five operating purge wells and three stand by purge wells</p>	<p>The project proponent should correct and clarify the text.</p>	
16.	<p>Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill; Page 154</p>	<p>The author states "<i>MH [Morrison Hershfield] carried out a conflict check for the proposed road design with the purge wells and observation wells, and no direct conflicts were identified. Some observation wells including, but not limited to, 8/83, 16/88 and 17/88 may be directly impacted by the ground disturbance associated with the construction and excavation activities.</i>"</p> <p>Comment: Insufficient information has been provided to the City of Toronto to assess the validity of this statement. Preliminary design drawings in plan view and cross section, showing legal property boundaries have not been provided in the EA report.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p>	

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
		The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for groundwater compliance monitoring.		
17.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill Page 154	<p>The author states <i>“MH [Morrison Hershfield] also carried out a conflict check for the proposed road design with gas probes located south of the proposed road (yellow triangles, south of proposed road, between the Keele Valley Landfill entrance and Vaughan Landfill entrance). These gas probes may be impacted by ground disturbance associated with the construction and excavation activities.”</i></p> <p>Comment: The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for landfill gas compliance monitoring. Further the author should clarify if conflict checks with the landfill gas header pipes and other related landfill infrastructure were undertaken.</p> <p>Buffer areas around the landfill have restricted land uses to limit liability through protection of landfill gas and infrastructure in the immediate vicinity of the project.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>The project proponent should confirm the conflict check with all the landfill gas infrastructure for the Keele Valley Landfill.</p>	
18.	Section 5 – Existing Conditions; Section 5.6.12.2.1 Groundwater Contaminant Plumes Page 154	<p>The author states <i>“The largest plume that covers the Disposal Services Landfill and Vaughan Landfill, and migrating through the Keele Valley Landfill is referred to as the “Vaughan Landfill Chloride Plume”. The plume located to the west of the Keele Valley Landfill is referred to as the “Industrial Park Chloride Landfill”.</i></p> <p>Correction: The two groundwater plumes described exist in groundwater below the Keele Valley Landfill and do not flow through the Keele Valley Landfill, but rather underneath the lined Keele Valley Landfill and through property owned by the City of Toronto. Additionally, these plumes are referred to as the Main Plume and the West Plume (one of two) in the annual reports prepared for the Keele Valley Landfill. They are composed of leachate impacted groundwater for which chloride is one (of many) indicator parameters.</p>	The project proponent should correct and clarify the text.	
19.	Section 5 – Existing Conditions; Section 5.6.12.2.2 Vaughan Landfill Infrastructure Page 155	<p>The author states <i>“The Teston Road Purge Well System (TPWS) is operated by the City of Toronto and consists of thirteen (13) purge wells in addition to approximately 21 observation wells.”</i></p> <p>Comment: This infrastructure is owned by the City of Toronto and is part of the Keele Valley Landfill Site and should be moved to the appropriate section in the report. The proponent should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for leachate collection.</p>	<p>The project proponent should correct and clarify the text.</p> <p>The project proponent should clarify ownership of infrastructure for all three landfills.</p> <p>The project proponent should provide a summarizing document containing information demonstrating how the proposed project meets the MECP D-4 guidance.</p>	
20.	Section 5 – Existing Conditions; Section	The author states <i>“A leachate main collecting leachate from all the purge wells runs underneath the proposed road in a north-south orientation between 21 Rodinea Road and Keele Valley Landfill and is considered a direct conflict with the proposed road design.”</i>	The project proponent should correct and clarify the text.	

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	5.6.12.2.2 Vaughan Landfill Infrastructure Page 155	<p>Comment: This infrastructure is owned by the City of Toronto and is part of the Keele Valley Landfill Site and should be moved to the appropriate section in the report. Additionally, the "leachate main" is referred to as "the leachate collection pipe" and is transmitting groundwater impacted by leachate.</p> <p>The proponent should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for leachate collection.</p>	<p>The project proponent should clarify ownership of infrastructure for all three landfills.</p> <p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p>	
21.	Section 5 – Existing Conditions; Section 5.6.12.2.2 Landfill Infrastructure Page 155	<p>The authors states <i>"The gas is collected and flared at a plant located west of the TPWS. The flare facility emits combusted gases that are released into the atmosphere which may induce exposure to the construction workers and future road users."</i></p> <p>Comment: The statement is not supported by the studies attached to the Draft IEA Report. There is no mention of a landfill gas flare in Appendix H – Air Quality Assessment. Further it is confusing to have the flare mentioned in the Draft IEA Report as the City of Vaughan has an environmental obligation to meet air emission regulatory requirements with respect to the operation of its flare.</p>	<p>The author should remove the unsupported statement.</p> <p>The project proponent should ensure that the supporting Air Quality Assessment have been review to ensure all receptors have been identified and assessed.</p>	
22.	Section 5 – Existing Conditions; Section 5.6.12.2.2 Landfill Infrastructure Page 155	<p>The author states <i>"MH [Morrison Hershfield] carried out a conflict check of the proposed road design with these gas extraction wells based on a review of available information and satellite image. The following conflicts and issues were identified:</i></p> <ul style="list-style-type: none"> ▪ <i>Gas Manhole MH1, gas wells GW4/97 and GW597, and a gas header connecting them are within 2 m (and possibly underneath) of the proposed multi-use pathway (MUP), and may be impacted by ground disturbance associated with the construction and excavation activities.</i> ▪ <i>Some of the on-site and off-site gas probes may be impacted as they most likely fall under the proposed pavement and/or MUP."</i> <p>Comment: Any impact to the operation of the Vaughan Landfill Gas System has the potential to cause adverse impact to the Keele Valley Landfill property. The continued operation of landfill control systems during the road construction and post-construction period of the transportation corridor is essential for compliance with site Environmental Compliance Approvals.</p>	<p>The project proponent should identify how continued operation of landfill control systems during the road construction and post-construction period of the transportation corridor will be maintained to ensure compliance with site Environmental Compliance Approvals, and, provides secure means to protect the landfill infrastructure, and provides ample maintenance access if repair or replacement of the infrastructure is required.</p> <p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p>	

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		The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for the management and monitoring of landfill gas.		
23.	Section 8 – Design Alternatives; Section 8.3; Section 2: Rodinea Road to the East Don River Valley; Page 213	<p>The author states <i>“To avoid the complicated landfill infrastructure present in this section, two basic roadway cross-sections were generated. The first cross-section is a full width section that is the standard design for new roads within York Region. The second is a smaller cross-section that could allow the roadway to pass between the landfills to the north and south.”</i></p> <p>Comment: The author should provide a scaled drawing in plan view and cross section on how the narrower section avoids the “complicated infill infrastructure present”.</p>	The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9).” as well as property lines, topographical features, above grade and below grade landfill infrastructure.	
24.	Section 8 – Design Alternatives; Section 8.3.2; Section 2, Constrained Cross-Sections; Page 214	<p>The author states <i>“The road is anticipated to be built on top of the narrow strip of raised elevation, adding to the justification of the constrained cross-section”.</i></p> <p>Comment: The “narrow strip of raised elevation” is part of the engineered side slope of the northern flank of the Keele Valley Landfill Site. The slope is not natural grade, but is rather engineered to facilitate stormwater management of the Keele Valley Landfill Site. This slope was re-engineered in the 1990s to incorporate gravel swales as part of the integrated storm management system.</p>	<p>The project proponent should revise the preliminary stormwater and drainage design to account for the drainage works in place at the northern margin of the engineered landfill side slope.</p> <p>The description and function of the northern flank of the Keele Valley Landfill is not included in the Existing Conditions for landfill infrastructure.</p>	
25.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to Full Evaluation Table in Appendix U: Section 2; Table item 1.3. Groundwater (sub factors 1.3.3 Large Volume Wells and 1.3.4 Private Wells)	<p>While evaluating the criteria for Alternative Designs – Section 2, the author states that <i>“there are no Large Volume Wells and no Private Wells within Section 2.”</i></p> <p>Comment: The Teston Road Purge Wells System is a series of dewatering wells for engineering controls of a groundwater plume emanating from the Vaughan Landfill. These wells are operated under Permit To Take Water (PTTW) Number 6724-AZ4P7K with a taking category of Remediation and the allowable takings are 1,046,880 Litres per Day.</p>	The project proponent should revise this evaluation to include permitted large volume wells.	
26.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to	While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 1 and Alternative 2 would have no impacts on the objectives of Municipal Landuse Planning Policies. The Criteria states “Development objectives of private property owners should be in conjunction with land use policies and future land use.”</i>	The project proponent should revise this evaluation to include and consider the development objectives of the planning for North Maple Regional Park. The integrity, access and nuisance effects of Alternate 1 and 2 on the future North Maple Regional Park is not considered.	

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	Full Evaluation Table in Appendix U:Section 2; Table item 2.1 Land Use Planning Policies, Goals, Objectives; Subfactor 2.1.3 Municipal Landuse Planning Policies/Goals/Objectives and Subfactor 2.1.3 Muni	Comment: The City of Toronto and the City of Vaughan have engaged in the Master Plan for North Maple Regional Park. This evaluation does not consider the severance of park access between the two landfills and the nuisance effects of a 4-lane road occupying lands within the park footprint.		
27.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to Full Evaluation Table in Appendix U:Section 2; Table item 2.1 Land Use Planning Policies, Goals, Objectives; Subfactor 2.1.4 Development Objectives of Private Property Owners	While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 1 and Alternative 2 would have no impacts on the objectives of private property owners. The Criteria states “Development objectives of private property owners should be in conjunction with land use policies and future land use.”</i> Comment: The City of Toronto is a private property owner. Conditions of the Environmental Compliance Approval involving maintenance and care of the Site are directed the City of Toronto. This may include future land use and infrastructure to maintain compliance.	The project proponent should revise this evaluation to include and consider the future land use policies.	
28.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to Full Evaluation Table in Appendix U:Section 2; Table item 2.2 Land Use – Community; Subfactor 2.2.4 Commercial/Industrial	While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 1 and Alternative 2 would have no impacts on commercial or industrial land uses. The Criteria states “The potential and significance of encroachment, severance displacement; long term alteration/disruption/nuisance effects/change to access/travel time to commercial/industrial.”</i> Comment: Both Alternate 1 and Alternative 2 would have impacts to current Land Use – Community. Throughout the text of the EA document ‘conflicts’ with landfill infrastructure, landfill access and long-term alteration and disruption of normal operations will be impacted by both Alternatives.	The project proponent should revise this evaluation to include and consider the existing land use and operational requirements to repair and replace landfill infrastructure.	

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29.	<p>Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215</p> <p>to</p> <p>Full Evaluation Table in Appendix U:Section 2; Table item 2.2 Land Use – Community; Subfactor 2.2.7 Municipal Infrastructure and Public Service Facilities</p>	<p>While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 1 and Alternative 2 would have the potential to provide new or continued access to the municipal and public service infrastructure in the area. The Criteria states <i>“The potential and significance of encroachment, severance displacement; long term alteration/disruption/nuisance effects/change to access/travel time to municipal infrastructure and public service facilities.”</i></i></p> <p>Comment: The City of Toronto and the City of Vaughan have engaged in the Master Plan for North Maple Regional Park. This evaluation does not consider the disconnection and severance of park access between the two landfills and the nuisance effects of a 4-lane road occupying lands within the park footprint.</p>	<p>The project proponent should revise this evaluation to include Community Land Use objectives for public access for North Maple Regional Park. The physical connection, integrity, access and nuisance effects of Alternate 1 and 2 on the future North Maple Regional Park is not considered.</p>	
30.	<p>Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215</p> <p>to</p> <p>Full Evaluation Table in Appendix U: Section 2; Table item 2.6 Contaminated Property and Waste Management; Subfactor 2.6.1 Existing landfills under Provincial regulations and ECA requirements</p>	<p>While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 2 would pass between the landfills and avoid impacts to most or all of the landfill infrastructure in the area. It is anticipated that this alternative would no require amendments/revisions to existing Environmental Compliance Approvals.”</i></p> <p>Comment: The author should clarify and provide detail on what is meant by “most or all of the landfill infrastructure”. This statement is in conflict with the existing conditions assessment and the recommendations of the Hydrogeology report (Appendix L).</p> <p>Comment: The statement does not indicate an understanding of the access required to monitor, operate, and maintain the landfill infrastructure. Can the proponent enumerate its understanding of the access required for landfill infrastructure and confirm suitable access for this has been considered in the evaluation, including space for construction repair/replacement of the infrastructure, if this is required.</p>	<p>The project proponent should clarify the foundation of the statement “It is anticipated that this alternative would not require amendments/revisions to existing Environmental Compliance Approvals”.</p> <p>The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9).” as well as property lines, topographical features, above grade and below grade landfill infrastructure.</p> <p>The proponent should enumerate its understanding of monitoring, operating, maintenance access required for landfill infrastructure. The proponent should demonstrate that sufficient access is provided to the landfill infrastructure in the vicinity of the transportation corridor.</p>	
31.	<p>Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215</p> <p>to</p>	<p>The full evaluation table in Appendix U; Section 2 item 4.3 Safety does not consider the reasonable assumption that there is a potential for landfill (methane) gas to be present within the transportation corridor/ right-of-way. It does not consider the potential health and safety implications of this on construction works, utility/appurtenances design, road design, and future maintenance workers.</p>	<p>The project proponent should revise and include worker health and safety with respect to the potential for landfill (methane) gas to be present in the subsurface of the transportation corridor/ right-of-way.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the omission of the health and safety hazard</p>	

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	Full Evaluation Table in Appendix U –Section 2; Table item 4.3 Safety		associated with the potential for landfill gas to be present in the proposed transportation corridor. The impact of the omission to the overall evaluation of Alternates to the Project should be considered.	
32.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation to Full Evaluation Table in Appendix U: Section 2; Table item 2.6 Contaminated Property and Waste Management; Subfactor 2.6.2 Contaminated Properties	While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 1 and Alternative 2 have “potential for encroachment and long-term alternation/disruption to the following “High Risk for Contamination” properties which includes the Keele Valley Landfill”. The evaluation includes the statement “If property is acquired a Phase II environmental Site Assessment (ESA) will be required.”</i> Comment: The City of Toronto has not been provided preliminary design details to confirm the validity of this statement. The City of Toronto is not able to assess the impacts future property acquisition and requisite investigations will have on the ability of the Keele Valley Landfill to maintain compliance with the Environmental Compliance Approvals.	The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9).” as well as property lines, topographical features, above grade and below grade landfill infrastructure.	
33.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation to Full Evaluation Table in Appendix U: Section 2; Table item 4.6 Engineering; Subfactor 4.6.1 Constructability	While evaluating the criteria of Alternative Designs – Section 2, the author states that <i>“Alternative 2 is more preferred because it is “easier to construct as there are fewer conflicts with the utilities and infrastructure associated with the Landfills. The evaluation criteria for Constructability is “Potential ease of implementation considering feasibility/difficulty of physical, property or environmental constraints”.</i> Comment: The statement does not reflect the information provided in the Draft IEA Report with respect to impacts to landfill infrastructure. Further the evaluation appears to have omitted evaluation of the access required to landfill infrastructure (monitoring/maintenance) that appears to be impacted by the implementation of the transportation corridor.	The project proponent should revise the constructability evaluation to include the additional receptors identified Existing Conditions; Section 5.6.12.2.2 Landfill Infrastructure (page 155). The project proponent should revise the constructability evaluation to include the documented, high-probability of landfill gas present in the subsurface at the project site. The project proponent should revise the constructability evaluation to include the documented, reasonable potential of landfill gas present in the subsurface at the project site and the access required for maintenance of landfill infrastructure.	
34.	Section 8 – Design Alternatives; Section 3: East Don River Valley Crossing Page 218 to	The author states that <i>“Section 3: East Don River Valley Crossing does not have any landfills. Therefore, non of the Alternatives will have impacts in the sub-factor group.”</i> Comments: The bridge abutments for Alternatives 1, 2 and 3 require the placement of fill on lands owned by the City of Toronto. Impacts to landfill infrastructure and access to compliance monitoring locations was not included in this evaluation.	The project proponent should revise the evaluation to include the City of Toronto/Keele Valley Landfill lands required for the bridge abutments.	

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	Full Evaluation Table in Appendix U: Section 3; Table item 2.6 Contaminated Property and Waste Management; Subfactor 2.6.1 Existing Landfills	The City of Toronto is not able to assess the impacts future property acquisition will have on the ability of the Keele Valley Landfill to maintain compliance with the Environmental Compliance Approvals.		
35.	Section 9 – Project Description; 9.1.3 Section 1: Teston Road from Rodinea Road to West Side of Don River Valley; Page 240	<p>The author states that <i>“There is extensive landfill related infrastructure for monitoring and collecting leachate and landfill gas which is expected to remain in operation and in place for many years.” And that [The constrained cross-section] will allow the roadway to fit between the landfills with minimum impacts to landfill infrastructure.”</i></p> <p>Comment: The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for the management and monitoring of landfill gas.</p> <p>The City of Toronto is not able to assess the validity of this statement without an accompanying drawing depicting the extensive infrastructure in relation to the constrained cross section.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9).” as well as property lines, topographical features, above grade and below grade landfill infrastructure.</p>	
36.	Section 9 – Project Description; 9.1.3 Section 1: Teston Road from Rodinea Road to West Side of Don River Valley; Page 240	<p>The author states that <i>“Existing access to the landfills and the existing gas flare facility will be maintained. A future intersection on Teston Road may also be implemented to provide access to the North Maple Regional Park once the park expands this far south.”</i></p> <p>Comment: The City of Toronto is not able to assess the validity of this statement without an accompanying drawing depicting the extensive infrastructure in relation to the constrained cross section.</p>	The project proponent should clarify and restructure this section identifying the correct owner/operator of the described systems and infrastructure.	
37.	Section 9 – Project Description; 9.1.3 Section 2: Teston Road from Rodinea Road to West Side of Don River Valley; Page 240	<p>The author states that <i>“While no property acquisition is proposed within Section 2 some embankment fill and grading may need to extend onto the adjacent properties although this will be reviewed further at the detail design stage of the project. Short retaining walls may be needed to limit grading encroachment particularly along the elevated section between the Keele Valley and Vaughan Township landfills.”</i></p> <p>Comment: This statement is in conflict with the conclusions of the Phase I Environmental Site Assessment for ESA Property 5 (7 Eaglet Court) which depicts two areas, Area A and Area B that would be subject to Phase II if property is acquired.</p> <p>The City of Toronto is not able to assess the validity of this statement without an accompany drawing depicting the property lines and infrastructure in relation to the constrained cross section.</p>	A schematic of the proposed cut/fills incorporating existing property lines and landfill infrastructure should be provided.	

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38.	Section 9 – Project Description; 9.1.3 Section 2: Teston Road from Rodinea Road to West Side of Don River Valley; Page 241	<p>The author states that <i>“Some impacts to existing landfill leachate and gas monitoring and collection infrastructure systems are expected although these will be kept to a minimum and will be subject to further site investigations and review at detail design.”</i></p> <p>Comment: Impacts to landfill infrastructure must be more comprehensively identified and assessed with respect to the intent of the infrastructure and its ability to continue to support the compliance of the Keele Valley Landfill with its Environmental Compliance Approvals.</p> <p>The City of Toronto will not accept any changes to its infrastructure without MECP concurrence to technical reports prepared by qualified individuals which conclude that the landfill infrastructure can continue to be operated and maintained in a manner that continues to support compliance with the Environmental Compliance Approvals for the Keele Valley Landfill.</p> <p>For clarity, fundamental to the potential environmental impact of the transportation corridor is the assessment of the impacts and potential changes to landfill infrastructure. The Draft IEA Report appears to be incomplete with the omission of this complete assessment.</p> <p>Further, the design basis of the transportation corridor must be based on protection of the environment and assessment as well as concurrence from the MECP for changes to landfill infrastructure, which should not be deferred to a later detail design stage, as the assessment may identify impacts which may alter the proposed right of way detailing.]</p>	<p>The project proponent should revise the report to include the omitted assessment of the impact to landfill infrastructure. This assessment needs to include technical reports prepared by qualified individuals which conclude that the landfill infrastructure can continue be operated and maintained in a manner that continues to support compliance with the Environmental Compliance Approvals for the Keele Valley Landfill.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the incomplete assessment of options with respect to landfill infrastructure. The impact of the incomplete assessment to the overall evaluation of Alternates to the Project should be considered.</p>	
39.	Section 9 – Project Description; 9.8 Utilities Page 251	<p>The author states <i>“Some existing gas collection and monitoring infrastructure at the existing landfills will need to be relocated. Some existing leachate monitoring wells may need to be relocated.”</i></p> <p>Clarification: The author should identify which infrastructure and ownership.</p> <p>Correction: There are no existing ‘leachate monitoring wells’. All of the current groundwater monitoring wells are constructed in the groundwater below the landfill.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>The project proponent should clarify ownership of infrastructure.</p> <p>The project proponent should revise the statement about leachate monitoring wells.</p>	

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		<p>Comment: Confirm how this meets the definition of a utility.</p> <p>Comment: The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for the Keele Valley Landfill Site.</p>		
40.	<p>Section 9 – Project Description; 9.9 Property Requirements; Table 9-2 Anticipated Property Requirements Page 298</p>	<p>The author describes the preliminary permanent property requirements for both permanent acquisition and temporary construction easement required for the project.</p> <p>For the City of Toronto owned lands, the area of permanent acquisition is 1315 m²; while areas requiring temporary construction easements are 980 m².</p> <p>Comment: The City of Toronto has not been provided preliminary design details to confirm the validity of this statement. The City of Toronto is not able to assess the impacts future property acquisition will have on the ability of the Keele Valley Landfill to maintain compliance with the Environmental Compliance Approvals.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>The project proponent should provide scaled drawings in plan view and cross section incorporating information where property acquisition may be required.</p>	
41.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Source Water Protection / Hydrogeology; Page 259</p>	<p>The authors states “<i>three Potential Environmental Effect(s):</i>”</p> <ul style="list-style-type: none"> • <i>Changes in plume chemistry</i> • <i>Lowering of groundwater level</i> • <i>Conflicts with gas monitoring probes at landfill sites</i> <p><i>and further categorize the potential significance of these as Insignificant (I) meaning that an effect may exhibit one or more of the following characteristics:</i></p> <ul style="list-style-type: none"> • <i>Not widespread.</i> • <i>Temporary or short-term duration.</i> • <i>Recurring effect lasting for short periods of time during or after project implementation.</i> • <i>Not permanent.</i> • <i>Once the stimulus is removed, the integrity of the social/environmental components is resumed”</i> <p>Comment: The responsibility for compliance of monitoring for plume chemistry, groundwater levels and landfill gas relative to effects downgradient of the proposed project falls to the City of Toronto. The information and assessment provided to date are not, in the City of Toronto's opinion, sufficient to classify the effects as insignificant. Changes in</p>	<p>The project proponent should revise this effects evaluation with an experienced and qualified professional with respect to landfill gas and hydrogeology revisit the temporary and spatial nature of evaluation and significance rating.</p>	

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		plume chemistry are neither reversible, localized, or hardly discernible in both the temporal and spatial sense.		
42.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Source Water Protection / Hydrogeology Page 259	<p>The author states “<i>three Potential Environmental Effect(s):</i>”</p> <ul style="list-style-type: none"> • <i>Changes in plume chemistry</i> • <i>Lowering of groundwater level</i> • <i>Conflicts with gas monitoring probes at landfill sites</i> <p>and offers recommended mitigation Measures:</p> <ul style="list-style-type: none"> • <i>Enhanced monitoring of the eastern edge of the chlorine plume to be put in place at all outfalls to prevent contamination.”</i> <p>Comment: The responsibility for compliance of monitoring for plume chemistry, groundwater levels and landfill gas relative to effects downgradient of the proposed project falls to the City of Toronto. The City of Toronto does not consider that the level of assessment is sufficient to assess potential long-term impacts on the Toronto’s (and Vaughan’s) ability to manage compliance of the landfills.</p> <p>Enhanced monitoring is not a mitigation measure, it is a collection of data which should be designed to assignment of the need for and design of mitigation The City of Toronto disagrees with the evaluation of these effect and the proposed mitigation measures.</p>	<p>The City of Toronto does not accept enhanced monitoring as a mitigation measure for proposed effect.</p> <p>The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the approved groundwater compliance monitoring program.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	
43.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Source Water Protection / Hydrogeology Page 259	<p>The author states “<i>three Potential Environmental Effect(s):</i>”</p> <ul style="list-style-type: none"> • <i>Changes in plume chemistry</i> • <i>Lowering of groundwater level</i> • <i>Conflicts with gas monitoring probes at landfill sites</i> <p>and offers mitigation that further reduce the level of significance to Negligible/Moderate (N) which means an effect that may exhibit one or more of the following characteristics:</p> <ul style="list-style-type: none"> ▪ <i>Reversible</i> ▪ <i>Small/localized/limited to the construction phase of the project</i> ▪ <i>A nearly zero or hardly discernable effect</i> ▪ <i>Impacting a population at a localized area.”</i> <p>Comment: The responsibility for compliance of monitoring for plume chemistry, groundwater levels and landfill gas relative to effects downgradient of the proposed project falls to the City of Toronto. The City of Toronto does not consider that the level of assessment is sufficient to assess potential long-term impacts on the Toronto’s (and</p>	<p>The project proponent should revise this effects evaluation and significance rating with an experienced and qualified professionals with respect to landfill gas and hydrogeology.</p>	

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		Vaughan's) ability to manage compliance of the landfills. Changes in groundwater plume chemistry are neither reversable, localized, or hardly discernible in both the temporal and spatial sense.		
44.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Source Water Protection / Hydrogeology Page 259	<p>The author provides the following “<i>Commitment to Future Works</i>”:</p> <ul style="list-style-type: none"> • <i>Perform detailed assessment of landfill conflicts in later design stages.</i> • <i>Perform desktop and field survey to further identify in-use water wells within 500m of the proposed alignment.</i> • <i>Amendments to the ECA if any changes are made to the landfill infrastructure.”</i> <p>Comment: The responsibility for compliance of monitoring for plume chemistry, groundwater levels and landfill gas falls to the City of Toronto.</p> <p>Associated with the Keele Valley Landfill in the area of the proposed road alignment, the Teston Road Purge Wells System is a series of “in-use” dewatering wells for engineering controls of a groundwater plume emanating from the Vaughan Landfill. These wells are operated under Permit To Take Water (PTTW) Number 6724-AZ4P7K with a taking category of Remediation and the allowable takings are 1,046,880 Litres per Day.</p>	<p>The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the approved groundwater compliance monitoring program.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	
45.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Archaeology Page 260	<p>The author states “<i>Potential Environmental Effect(s); Recommended Mitigation Measures and Commitment to Future Works with respect to Archaeology</i>”:</p> <ul style="list-style-type: none"> • <i>Undisturbed Keele Valley landfill lands require Stage 2 test pit survey at five metre intervals prior to any soil disturbing activities.”</i> 	Authorization from the City of Toronto will be needed for any access or work on the Keele Valley Landfill Site. Access agreements may be required.	
46.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Heritage	<p>The author states “<i>Potential Environmental Effect(s); Recommended Mitigation Measures and Commitment to Future Works with respect to Heritage</i>”:</p> <ul style="list-style-type: none"> • <i>A baseline vibration assessment should be undertaken during detailed design for Cultural Heritage Landscapes (CHL) 17, 18 and 27.”</i> <p>Comment: The EA does not speak to the requirement for a vibration assessment and potential monitoring requirements for other structures and utilities that could be impacted by the proposed project.</p>	<p>In addition to the Heritage structures identified in the EA, the EA should confirm the requirement for the Design Team and Constructor, to identify, assess, mitigate and monitor (during construction) potential vibration impacts on structures and utilities that could be impacted by the proposed project.</p> <p>As the proposed project has the potential to impact City of Toronto infrastructure, the City of Toronto vibration limits for</p>	

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Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
	Page 261		construction activities should be considered and implemented as a vibration criteria in addition to the criteria identified in Appendix G.	
47.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Property Requirements Page 261	<p>The author states <i>“Potential Environmental Effect(s); Recommended Mitigation Measures and Commitment to Future Works with respect to Property Requirements:</i></p> <ul style="list-style-type: none"> <i>Review designs and gradient requirements to reduce acquisition and easements to the greatest extent possible.”</i> <p>Comment: The Keele Valley Landfill Site environmental compliance monitoring program includes at grade and below grade monitoring infrastructure that may be located on lands selected for acquisition or expropriation.</p> <p>Any modification of infrastructure required for compliance monitoring would be subject to Ministry of Environment, Conservation and Parks (MECP) approval following an Environmental Compliance Approval amendment application to by the City of Toronto.</p> <p>If 22,000m² of temporary easements are required for project construction and 43,000 m² of public and private property are required to be acquired for operation, a detailed plan view drawing should be provided to the City of Toronto to identify which parcels are affected.</p> <p>If City of Toronto property ownership for the ongoing environmental compliance monitoring program are affected in a way that will require temporary or permanent changes to operations, this effect may not be adequately mitigated.</p>	<p>The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9) identifying the temporary easements for construction and the proposed property acquisition.</p> <p>The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer Commitment to Future Works that would alter the approved technical controls or the compliance monitoring program.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	
48.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Access Page 261	<p>The author states <i>“Potential Environmental Effect(s); Recommended Mitigation Measures and Commitment to Future Works with respect to Access:</i></p> <ul style="list-style-type: none"> <i>Consult with property owners to discuss impacts and mitigation measures if accesses are to be closed/relocated.”</i> <p>Comment: If City of Toronto property access to complete the ongoing environmental compliance monitoring program are affected in a way that will require temporary or permanent changes to access, this effect may not be adequately mitigated.</p>	The project proponent should provide scaled drawings in plan view and cross section incorporating the information from “Section 2, Constrained Cross Section (Figure 8-9) identifying the temporary and permeant changes to access.	

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49.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Contamination Page 262	<p>The author states “four” <i>Potential Environmental Effect(s) [including]:</i></p> <ul style="list-style-type: none"> <i>Presence of landfill waste and/or gas in sub-surface within proposed right-of-way or construction limits.</i> <p>and further categorizes the potential significance of this (and other effects) as Significant (S).”</p> <p>Comment: None of the Recommended Mitigation measures apply to this effect, yet the level of significance following mitigation is assessed to be Insignificant (I).</p> <p>The author has not identified how potential landfill waste and/or gas will be mitigated during construction, operation and maintenance of the proposed project.</p> <p>Future investigations during the detail design stages of the project should only advance the reasonable assumption that landfill gas is present in the right-of-way and not eliminate the need to consider the potential for landfill gas to be present in the subsurface.</p>	<p>The project proponent should revise the effects evaluation to include the documented, high-probability of landfill gas present in the subsurface at the project site during construction.</p> <p>The project proponent should acknowledge that the project must be developed based on the reasonable assumption of the potential for landfill waste and/or gas to be present in the subsurface regardless of the outcome of short-term investigations further into the design of the project.</p> <p>The project proponent should acknowledge that the project must be developed with due consideration of plans to mitigate hazards from landfill gas for workers (e.g., construction phase, maintenance during operating phase) that do not rely on the operation of landfill gas collection systems,</p>	
50.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Contamination Page 262	<p>The author provides a “<i>Commitment to Future Works:</i>”</p> <ul style="list-style-type: none"> <i>Further investigation of presence of landfill waste and gas</i> <i>Develop mitigation plan should any landfill related waste and gases be found during excavation activities.”</i> <p>Comment: The author has not demonstrated how potential landfill waste and/or gas will be mitigated during construction, operation and maintenance of the proposed project.</p> <p>Future investigations during the detail design stages of the project should only advance the reasonable assumption that landfill gas is present in the right-of-way and not eliminate the need to consider the potential for landfill gas to be present in the subsurface.</p> <p>The City of Toronto does not consider that the level of assessment is sufficient to the address the level of Commitment that may be required. This effect should be included in the existing conditions assessment.</p>	<p>The project proponent should acknowledge that the project must be developed based on the reasonable assumption of the potential for landfill gas to be present long-term in the subsurface regardless of the outcome of short-term investigations later in the design of the project.</p> <p>The project proponent should acknowledge that the project must be developed with due consideration of plans to mitigate hazards from landfill waste and/or gas for workers that do not rely on the operation of landfill gas collection systems.</p>	

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51.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Operations & Maintenance; Valued Ecosystem Components: Source Water Protection / Hydrogeology Page 263	The authors provide a “ <i>Commitment to Future Works:</i> ” <ul style="list-style-type: none"> • <i>Measures to ensure road salt doesn’t contribute to landfill chloride plumes are to be incorporated into the design.</i>” 	This Commitment to Future Works is noted and accepted. The City of Toronto would like to review the plans for future measures to ensure sodium and chloride impacted runoff does not infiltrate or recharge within Section 2.	
52.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Operations & Maintenance; Valued Ecosystem Components: Air Quality Page 263	The author does not identify landfill (methane) gas as a Potential Environmental Effect during operations and maintenance of the road. Comment: The potential for landfill (methane) gas to be present and migrate along preferential pathways in the subsurface will persist after construction.	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met. Within the D-4: Environmental Considerations for Non-Operating Sites, Section 4.2 states “ <i>Particular attention shall be given to the production and migration of methane gas</i> ” The proponent has not demonstrated how potential landfill gas will be mitigated during operation and maintenance of the proposed project.	
53.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Operations & Maintenance; Valued Ecosystem Components: Access Page 264	The author states “ <i>Potential Environmental Effect(s) that “The project will not impede the operations of the Keele Valley Landfill, its monitoring programs or access to its infrastructure (including underground infrastructure).”</i> ” Comment: This is in conflict with statements made in the Hydrogeology Section (page 299), where the authors state “ <i>the current design appears to impact three Keele Valley Monitoring Wells and up to three Keele Valley Landfill Gas Monitoring Probes.</i> ” Comment: The City of Toronto has not been provided preliminary design details to confirm the validity of this statement.	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met. The monitoring wells and gas probes are included in the regulatory compliance monitoring program, this Commitment to Future Work is in conflict with statements made in Section 5 – Existing Conditions and Section 9 – Project Description. The project proponent should edit and reconcile this omission throughout the report.	

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54.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.5.1 Archeology Page 291 Appendix I – Stage 2 Archeological Assessment Figure 5: Sheet 3	A recommendation of the Stage 2 Archeological Assessment states that <i>“Some of the Keele Valley Lands (7 Eaglet Court) that overlap with the study area exhibit archaeological potential and require stage 2 test pit survey at 5 metre intervals for the undisturbed areas prior to any soil disturbing activities.”</i> Comment: The Stage 2 report describes some areas without referencing a figure or corresponding area. Presumably this is Figure 5: Sheet 3 for the area denoted in Orange.	The project proponent should provide properties and easement lines be added to Figure 4 (Sheet 2), Figure 5 (Sheet 3) and Figure 6 (Sheet 4). The project proponent should confirm the investigation locations are within the proposed project limits. The City of Toronto request the opportunity to review and comment on of the revised drawings, preferably provided in PDF and CAD format.	
55.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.1.5 Soil Management Page 295	The project proponent should be aware that Appendix O is not referenced in the text of the report.	The project proponent should correct and clarify the text.	
56.	Appendix O: Soils Investigation Report; Section 2.3 Field Screening Measurements Page 3	For field screening methodology, the author states: <i>“Methane elimination mode turned on.”</i> Comment: Considering that the project site is located between three landfills and that there is a documented, high probability for landfill gas to be present in the subsurface, the City of Toronto questions why the field measurement methodology would exclude measuring for methane.	The project proponent should provide justification why the field equipped for soil gas used a method that prevented methane field monitoring during the soil investigation.	
57.	Appendix O: Soils Investigation Report; Results; Section 3.1.3. Hydrogeology Page 5	The author states <i>“The regional groundwater is expected to flow towards the tributaries of the Don River West Branch in the western portion of the Project Area and towards the tributaries of Don River East Branch in the eastern portion of the Project Area.”</i> Comment: The aquifer systems in Section 2 have been extensively mapped in detail. The correct description for the prevailing groundwater flow should be adopted from Appendix K; Figure 7.	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	
58.	Appendix O: Soils Investigation Report;	The author states <i>“The maximum values of CGI and PID readings for all soil samples were 15 ppm and 1 ppm respectively. A summary of the headspace combustible vapours for the soil samples is provided in Table C0 in APPENDIX C.”</i>	The project proponent should revise the report text or correct Table C-0.	

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	Section 3.3 Soil Conditions Page 6	Comment: There is no measurement of 15 ppm in Table C-0.		
59.	Appendix O: Soils Investigation Report; Section 3.7 Landfill Waste Page 9	<p>The author states <i>“On the other hand, the three boreholes drilled by MH (MH-BH2 through MH-BH4) and four boreholes drilled by WSP (BH-P9 through BH-P12) east of Rodinea Avenue and between Vaughan Landfill and Keele Valley Landfill, all within the Right-of-Way, did not exhibit any evidence of waste/garbage in the soil. This information suggests that waste may be present in the subsurface within the road alignment, though, if present, it will be shallow and it will be in isolated pockets. The presence of waste within the road ROW should be further investigated during the geotechnical investigation that will be undertaken at later design stages.”</i></p> <p>Comment: The Soil Investigation Report appears to have omitted existing condition information provided by the City of Toronto. Specifically, The City of Toronto provided the most easterly and westerly borehole logs for the Teston Road Purge Wells to the project team in November 2023. Waste was noted in both of the borehole logs. The Soils report was issued on April 4, 2024, without the inclusion of this information provided by Toronto. At the west end of the Teston Road Purge System the borehole log for PW1-10 exhibited mixed sand and garbage to a depth of 7.6 metres below ground surface, while at the east end the borehole log PW1-95 describes layered sand, waste and clay to a depth of 7 meters below ground surface.</p>	<p>The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.</p> <p>The project proponent should revise the statement <i>“that waste may be present in the subsurface within the road alignment, though, if present, it will be shallow and it will be in isolated pockets”</i>.</p> <p>The project proponent should acknowledge that the project must be developed based on the reasonable assumption of the potential for landfill waste and/or gas to be present in the subsurface regardless of the outcome of short-term investigations further in the design of the project.</p>	
60.	Appendix O: Soils Investigation Report; Section 3.7 Landfill Waste Page 9	<p>The author states <i>“Landfill gas will likely be present in the sub-surface within the road Right-of-Way, and measures shall be included in the design to prevent its migration into new infrastructure (particularly storm sewers).”</i></p> <p>Comment: The statement does not fully address the mitigation needed to address the hazards associated with the reasonable potential for landfill (methane) gas in the subsurface. Refer to the cover letter provided with these comments for further comment.</p>	<p>The proponent should review the cover letter provided with these comments and take reasonable action to expand the extent of mitigative measures considered for the project.</p> <p>The proponent should acknowledge that the project must be developed based on the assumption of the reasonable potential for landfill waste and/or gas to be present in the subsurface regardless of the outcome of short-term investigations further in the design of the project.</p>	
61.	Appendix O: Soils Investigation Report; Appendix D – Borehole Logs Page 48 and 49	Borehole logs for MH-BH-3 and MH-BH-4 include the standard notation of an inverted triangle to depict the water table at the bottom of each borehole.	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	

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		Clarify: The author should clarify if groundwater was detected in these boreholes and if so, why is this omitted in the report text.		
62.	Appendix O: Soils Investigation Report; Appendix D – Borehole Logs	Regarding the borehole logs, there is no indication in the text or on the borehole logs if the borehole were backfilled with drill cuttings or grout.	The project proponent should confirm if the boreholes not completed as monitoring wells were backfilled	
63.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.1.5 Soil Management Page 295 AND Appendix O: Soils Investigation Report; Section 5 Recommendations, 4th bullet Page 11	The authors states: <i>“The presence of landfill waste within the road ROW should be further investigated during the geotechnical investigation that will be undertaken at later design stages.”</i> Comment: Investigations of the presence of waste fill within the road right-of-way may be in proximity to City of Toronto landfill infrastructure. The proponent is advised to take due care to avoid existing infrastructure when conducting any subsurface investigations.	This Commitment to Future Works is noted. The proponent should take due care to avoid the existing landfill and landfill infrastructure.	
64.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.1.5 Soil Management Page 295 AND Appendix O: Soils Investigation Report; Section 5 Recommendations Page 11	The authors states: <i>“The presence of landfill gas beneath the road ROW should be further investigated in conjunction with the geotechnical investigation that will be undertaken at later design stages.”</i> Comment: The author has not demonstrated how potential landfill gas will be mitigated during construction, operation and maintenance of the proposed project. The design basis of the transportation corridor must reasonably be based on the potential for landfill waste and/or gas to be present in the subsurface, regardless of the outcome of short-term studies.]	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met. Within the D-4: Environmental Considerations for Non-Operating Sites, Section 4.2 states <i>“Particular attention shall be given to the production and migration of methane gas.”</i> The project proponent should acknowledge that the project must be developed based on the reasonable assumption of the potential for landfill waste and/or gas to be present in the subsurface, regardless of the outcome of short-term studies.	
65.	Section 10 – Environmental Effects, Mitigation Measures &	The author states: <i>“A mitigation plan should be developed against the possibility of encountering any landfill related waste and gases during excavation activities. In such an</i>	[The project proponent should modify accordingly references to the operation of landfill gas collection systems in statements on	

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	<p>Commitment to Future Work; Section 10.6.1.5 Soil Management Page 295</p> <p>AND</p> <p>Appendix O: Soils Investigation Report; Section 5 Recommendations Page 11</p>	<p><i>event, the landfill operator should be immediately notified, and control measures should be taken to minimize the exposure of harmful chemicals and gases to construction workers."</i></p> <p>Comment: While a mitigation plan for encountering waste and gases during excavation activities is needed for the project, the reference to the inclusion of the landfill operators in this plan may not always be feasible. Any plan to mitigate hazards on the project cannot and should not reasonably rely on the operation of landfill gas controls system. The construction of the transportation corridor cannot rely on the landfill gas control systems to mitigate the potential for landfill gas to be present in the subsurface. Operation of landfill gas control systems shall not be relied upon to protect workers for the construction or future maintenance of the transportation corridor, including its subsurface utilities, sewers, conduits, pipes or other enclosed subsurface spaces.</p>	<p>plans to mitigate the hazards associated with landfill gas during construction activities.</p> <p>The project proponent should acknowledge that the project must be developed with due consideration of plans to mitigate hazards from landfill waste and/or gas for construction and future maintenance workers that do not rely on the operation of landfill gas collection systems.</p> <p>Any changes in the subsurface resulting from the proposed project that alter conditions, create preferential pathways or increase risk for gas migration must be controlled by the project proponent.</p>	
66.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.2.1 Drainage Page 298</p>	<p>The author states <i>"Due to the site being located within High Volume Groundwater Recharge Areas, maintaining pre-development groundwater recharge rates is required by TRCA."</i></p> <p>Comment: The TRCA require pre-development groundwater recharge be maintained; however, the hydrogeology section of the report states that "While the infiltration of storm water is a common practice for "Low Impact Development" or LID, it should not be included in the design of the current project between Keele Street and the Don River East Branch.</p>	<p>The project proponent should clarify and restructure this section to address this conflict.</p>	
67.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.2.1 Drainage Page 298</p>	<p>The authors states <i>"It is recommended to conduct water balance analysis and further evaluate the feasibility of enhanced recharging measures during the detailed design stage. It is recommended that any recharging facilities be situated at more than 250 meters from the boundary of landfill sites."</i></p> <p>Comment: Landfill leachate impacted groundwater plumes from sources not attributed to the Keele Valley Landfill Site are monitored upgradient and downgradient of the proposed Teston Road for the entirety of proposed Section 2 and at distances greater than 250 from the Site Boundaries.</p> <p>The stormwater design for the Keele Valley Landfill Site involves infiltration to maintain the Main Plume and under the Keele Valley Landfill and thus under control of the Teston Road Purge Well System and Southern Purge Wells System and any changes that spread</p>	<p>The project proponent should incorporate site specific information into the Future Commitments.</p>	

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		the plume in the upgradient area could be problematic for overall management and compliance of the Site.		
68.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.2.1 Drainage Page 298	<p>The authors states <i>“It is recommended to conduct water balance analysis and further evaluate the feasibility of enhanced recharging measures during the detailed design stage. It is recommended that any recharging facilities be situated at more than 250 meters from the boundary of landfill sites.”</i></p> <p>Comment: The Teston Road Purge well system is an active dewatering system designed to capture impacted groundwater and manage plume migration. Enhanced recharge within the capture zone may affect the ability of Keele Valley Landfill Site operations to meet the objectives of the environmental compliance monitoring.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>The project proponent should not employ enhanced recharge measures that have the potential to alter the current and future operation and/or expansion of the Teston Road Purge Well System and Southern Purge Well System.</p>	
69.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.2.1 Drainage Page 298	<p>The authors states <i>“A Stormwater Management plan was developed to meet the stormwater management objectives in terms of water quantity, quality, erosion, and balance. Further details regarding this can be found in Appendix L.”</i></p> <p>Comment: Appendix L is the Hydrogeology Report. Appendix K – Drainage and Stormwater Management report is not summarized in the text. Comments will be made for Appendix K, Parts 1 through 9.</p>	The project proponent should be aware that Appendix K is not referenced in the text of the report.	
70.	Appendix K – Drainage and Stormwater Management Report Section: Page: 298	<p>The project proponent has identified options for drainage and stormwater management however have not identified a preferred option in Section 10 of the Draft IEA Report. Three options for Outlet 4 are discussed in Appendix K Part 2 but are not brought forward in the Draft IEA Report.</p> <p>This section of the report appears incomplete.</p>	<p>The project proponent should expand this section to clarify the Options Analysis in Appendix K Part 2 regarding Alignment Section 2.</p> <p>The City of Toronto cannot evaluate the potential impacts to stormwater management of the Keele Valley Landfill Site without a clear option being summarized in the Draft IEA Report.</p>	
71.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.4 Source Water Protection Page 298	<p>The authors states <i>“The aquifer beneath the Study Area is “vulnerable” to contamination by road salt specifically because of the existence of landfill-related chloride plumes within it.”</i></p> <p>Comment: This is incorrect. The vulnerability of the aquifer is a function of the intrinsic properties of the aquifer material and the presence or lack of a confining layer. The</p>	The project proponent should clarify and re-word this section.	

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Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
		presence of landfill-related groundwater plumes does not make an aquifer more or less vulnerable.		
72.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“the current design appears to impact three Keele Valley Monitoring Wells and up to three Keele Valley Landfill Gas Monitoring Probes.”</i></p> <p>Comment: The author should indicate how this meets Section 5.2.2. of the D-4 Guideline identified above with respect to the technical controls for groundwater compliance monitoring and landfill gas compliance monitoring.</p>	<p>The project proponent should edit and reconcile the statement that the interim plan will eliminate impacts to landfills.</p> <p>The evaluation of the Preferred Alternative Alignment may be impacted by the incomplete assessment of options with respect to landfill infrastructure. The impact of the incomplete assessment to the overall evaluation of Alternates to the Project should be considered.</p>	
73.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“The study has determined that the hard surfacing and drainage changes may result in slight changes in landfill plume chemistry (less dilution of the chloride plumes that are present beneath the landfills), but this is not expected to be significant and may not be detectable in the existing groundwater monitoring program.”</i></p> <p>Comment: The City of Toronto has not been provided preliminary design details to confirm the validity of this statement. As per Appendix K Stormwater management report, if all stormwater is being collected and conveyed how did the hydrogeology study conclude that drainage changes may result in changes to landfill plume chemistry.</p> <p>The City of Toronto is not able to assess the validity of this statement without the accompanying assessment and calculations used to draw this conclusion.</p>	<p>The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.</p>	
74.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“The study has determined that the hard surfacing and drainage changes may result in slight changes in landfill plume chemistry (less dilution of the chloride plumes that are present beneath the landfills), but this is not expected to be significant and may not be detectable in the existing groundwater monitoring program. Conversely, infiltration of salt-impacted road-runoff into the highly permeable soils in the area of the landfills does have the potential to contribute to the existing chloride plumes and to interfere with the ongoing landfill monitoring.”</i></p> <p>Clarification: Whereas chloride (and sodium) are a component of landfill leachate impacts delineated and defined as “plumes”, these are key indicator parameters and other parameters with the site boundary criteria also need to be considered.</p>	<p>The project proponent should clarify and restructure this section to address this conflict.</p>	

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
75.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“The study has determined that the hard surfacing and drainage changes may result in slight changes in landfill plume chemistry (less dilution of the chloride plumes that are present beneath the landfills), but this is not expected to be significant and may not be detectable in the existing groundwater monitoring program. Conversely, infiltration of salt-impacted road-runoff into the highly permeable soils in the area of the landfills does have the potential to contribute to the existing chloride plumes and to interfere with the ongoing landfill monitoring.”</i></p> <p>Comment: The author should provide the details on how this infiltration was assessed to be insignificant. Was a mass balanced approach used? If so, the author should provide the City of Toronto with the details and assumptions.</p>	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	
76.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The author states <i>“The study has determined... infiltration of salt-impacted road-runoff into the highly permeable soils in the area of the landfills does have the potential to contribute to the existing chloride plumes and to interfere with the ongoing landfill monitoring.”</i></p> <p>Comment: Any additions to the subsurface that could interfere or distort the ability of the City of Toronto to perform compliance monitoring will require an amendment to the Environmental Compliance Approval. The City of Toronto does not consider that the level of assessment is sufficient to assess potential long-term impacts on the Toronto's (and Vaughan's) ability to manage compliance of the landfills.</p>	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.	
77.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“The study has determined that there may be relatively minor lowering of the groundwater level at and around the dewatering locations, particularly at the proposed bridge...”</i></p> <p>Comment: Temporary dewatering was not included in the impact assessment Table 10-1 during construction. The Keele Valley Landfill Site has an active, permanent dewatering system along Teston Road.</p>	The project proponent should revise Table 10-1 to include impacts of construction (temporary) dewatering.	
78.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	<p>The authors states <i>“All the conflicts identified with the Vaughan Landfill, Keele Valley Landfill and Disposal Services Landfill infrastructure should be communicated to the landfill operators.</i></p> <p><i>Detailed assessment of the severity of the conflict and the appropriate mitigation measures is recommended in later design stages. Any changes to the landfill infrastructure will require amendments to the ECAs under which the affected landfills operate.”</i></p>	<p>The City of Toronto has not been provided sufficient detail regarding these conflicts.</p> <p>The project proponent should edit and reconcile the statement that the interim plan will eliminate impacts to landfills.</p>	

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
		<p>Comment: The City of Toronto does not consider that the level of assessment is sufficient to assess potential long-term impacts on the Toronto's (and Vaughan's) ability to manage compliance of the landfills. The City of Toronto has not been provided enough information to confirm the validity of this statement.</p> <p>The Author's statement conflicts with several other passages from the executive summary to Section 10 that <i>"The project will not impede the operation of the Keele Valley Landfill, its monitoring programs/requirements, or access to its infrastructure (including underground infrastructure)."</i></p>	<p>The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the approved groundwater compliance monitoring program.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	
79.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 300	<p>The author provides a <i>"Commitment to Future Work to include enhanced monitoring of the eastern edge of the chloride plume is recommended during construction of the bridge over the Don River East Branch."</i></p> <p>Comment: Enhanced monitoring is not a mitigation measure, it is a collection of data which should be designed to assignment of the need for and design of mitigation.</p>	<p>The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the approved groundwater compliance monitoring program.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	
80.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.6 Contamination Overview Study & Phase One ESAs Page 301 Appendix N – Phase I ESA Property 5 Figures	<p>The authors states <i>"Property 5 includes Navestark Contractors and the Keele Valley Landfill. Two areas of potential environmental concern were identified at the Phase One Property, due to a possible importation of fill material of unknown quality during the development of the Phase One Property, and waste disposal sites at the Phase One Property, adjacent north, and south as well as 75m northwest of the Phase One Property."</i></p> <p>Comment: Clarification is required to determine ownership and scope. What is identified as a risk due to 'a possible importation of fill material of unknown quality' may in fact be a component of the engineering stormwater management system (swales) at the northend of the Keele Valley Landfill Site.</p> <p>Figure 4 for Property 5's Phase One ESA fails to identify landfill gas a potential contaminant of concern.</p>	<p>The City of Toronto has not been provided sufficient detail regarding these conflicts.</p> <p>The project proponent should provide scaled drawings in plan view and cross section incorporating information where property acquisition may be required.</p> <p>The proponent should revise the Phase One ESA for Property 5 to include mention of landfill gas.</p>	
81.	Section 11 – Future Commitments; Section 11.2.4 Archaeological Studies	<p>The authors states a <i>"Commitment to Future Work that recommends a portion of the Keele Valley landfill lands (7 Eagle Court) that overlap with the Project Study Area exhibits</i></p>	<p>This Commitment to Future Works is noted and accepted. The City of Toronto would need to grant permission to provide access for future investigations.</p>	

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
	Page 304	<i>archaeological potential and requires a Stage 2 archaeological assessment test pit survey at five metre intervals prior to any soil disturbing activities."</i> Comment: Permission to access property would need to be provided by the City of Toronto.		
82.	Section 11 – Future Commitments; Section 11.2.6 Phase 2 Environmental Site Assessment Page 305	The authors states a <i>"Commitment to Future Work that includes a Phase Two Environmental Site Assessment is required for properties with PCAs before a Record of Site Condition (RSC) can be submitted for the site. A Phase Two Environmental Site Assessment is therefore recommended for Property 5 [among others] which all include APECs."</i>	This Commitment to Future Works is noted. The City of Toronto would need to grant permission to provide access for future investigations.	
83.	Section 11 – Future Commitments; Section 11.3.5 Environmental Compliance Approvals Page 307	The authors states a <i>"Commitment to Future Work that includes numerous ECA's are currently present for all three landfill sites adjacent to the Project Study Area: the Keele Valley Landfill, Vaughan Landfill, and Disposal Services Landfill sites. The ECA's within the Project Study Area that may potentially require amendments include: Provisional Certificate of Approval of Keele Valley Landfill Site Parts of Lots 21 to 28 inclusive, Concession 3 (No. A230610)."</i> Comment: The City of Toronto cannot proactively or voluntarily amend the Keele Valley Landfill Environmental Compliance Approvals for the proposed project. Any future amendments would be subject to legal and regulatory review and consultation. Toronto cannot guarantee at this time that any amendments can be implemented.	The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the conditions of the Environmental Compliance Approvals. The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.	
84.	Section 11 – Future Commitments; Section 11.3.5 Environmental Compliance Approvals Page 307	The authors states <i>"Any changes to the landfill infrastructure and/or encroachment within the existing buffer zones will likely require amendments to the Environmental Compliance Approval (ECA) under which the landfill operates. These will likely need to be prepared by the owners of these facilities in consultation with the Ministry of the Environment Conservation and Parks and with input from the Regional Municipality of York."</i> Comment: The City of Toronto cannot proactively or voluntarily amend the Keele Valley Landfill Environmental Compliance Approvals for the proposed project. Any future amendments would be subject to legal and regulatory review and consultation. Toronto cannot guarantee at this time that any amendments can be implemented.	The project proponent is not named on the Environmental Compliance Certificate for the Keele Valley Landfill Site and is therefore not in a position to offer recommendations that would alter the conditions of the Environmental Compliance Approvals. The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.	
85.	Appendix D.1 – Transportation System Technical Report #1, 4.1.1	The author states: <i>"The City of Vaughan has plans to increase the size of the park through a phased planning approach. The expected final size of the park will be roughly 365</i>		

Table 1: City of Toronto Comments
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 & Bathurst Street

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Review Proposed Action/Solution	Proponent's Response
	North Maple Regional Park	<p><i>hectares and will cover the land of the former Vaughan Landfill and the former Keele Valley Landfill.</i></p> <p>Comment: The City of Toronto makes no guarantee regarding the incorporation of Keele Valley Landfill Site into North Maple Regional Park. This process is subject to legal and regulatory review. The timing and phasing of the project has not been confirmed. The estimated potential timeframe is minimum twenty years in the future.</p>		
86.	Appendix M – Contamination Overview Study	<p>The Contamination Overview Study does not acknowledge the potential for landfill waste and/or gas to be present in the vicinity of the 3 closed landfills identified in the report. The purpose of the report was to “determine if there are any indications of environmental impairment to the subject property related to activities that have occurred at the subject property or from activities that have occurred at neighbouring properties.” The potential for combustible gas (e.g., landfill gas contains methane) to be present in the subsurface in the vicinity of the 3 closed landfill for decades to come is a potential environmental impairment and a health and safety risk that must be considered PRIOR to the development of Teston Road.</p>	<p>The terms of reference for the Contamination Overview Study scope needs to be revised in consultation with MECP with full clarity on the location of the proposed project with respect to the 3 closed landfills.</p>	
87.	Appendix N – Phase One ESA	<p>The author states <i>“This Phase One ESA was prepared in general accordance with Ontario Regulation (“O. Reg.”) 153/04 (as amended) to assess current and historic potentially contaminating activities (“PCAs”) that have occurred on the Phase One Property and on the surrounding properties within the 250 m radius (Phase One Study Area) that would contribute to an area of potential environmental concern (‘APEC’) on the Phase One Property. With the addition of some key information, that would become available at later stages in the Project, this Phase One ESA may be suitable to be used in support of a filing of Record of Site Condition (RSC).”</i></p> <p>Comment: The Phase One ESA for properties adjacent and in the vicinity of the closed landfills should NOT be considered suitable for filing an RSC due to omission to identify and confirm potential contaminating activities, specifically the failure to identify the potential for the presence of landfill waste and/or gas.</p>	<p>The proponent should revise the Phase One ESA for Property 5 to include mention of landfill waste and/or gas.</p>	
88.	Appendix Q – Climate Change Assessment Report – IEA for Teston Road Area Improvements (Highway 400 to Bathurst Street)	<p>Comment: Methane is a greenhouse gas. The project proposes to have conflicts/impact to the landfill gas collection system at the Vaughan Landfill. No discussion is provided on the importance of restoring the Vaughan Landfill system for landfill gas collection and flaring when it is impacted by the transportation corridor project.</p>	<p>The proponent should consider addressing the impact to the Vaughan Landfill’s system for collection of landfill (methane) gas with respect to its potential climate change impact of the proposed transportation corridor.</p>	

ATTACHMENT B

**Property boundary and land use
related Instruments**

THE CONSOLIDATED HEARINGS BOARD

IN THE MATTER OF Sections 2, 3 and 5 of the Consolidated Hearings Act, 1981, S.O. 1981, c.20;

- and -

IN THE MATTER OF Sections 30, 33 and 38 of the Environmental Protection Act, R.S.O. 1980, c.141 as amended;

- and -

IN THE MATTER OF Sections 22(1) (3) (4) and 34(11) (25) (27) of the Planning Act, 1983, S.O. c.1 as amended;

- and -

IN THE MATTER OF Section 169(8) and (9) of the Regional Municipality of York Act, R.S.O. 1980, c.443;

- and -

IN THE MATTER OF an undertaking by The Municipality of Metropolitan Toronto to alter the existing eastern and northern boundaries of the Keele Valley Landfill Site for the provision and operation of facilities for the purpose of receiving, dumping and disposing of waste on those lands shown as Area 2 and 5 on Metropolitan Toronto Works Department Plan No. 1624-2886;

- and -

IN THE MATTER OF an application by The Municipality of Metropolitan Toronto for a certificate of approval under Part V of the Environmental Protection Act, in respect of part of the Keele Valley Landfill Site, being Part of Lots 23, 24 and 25, Concession 3 in the Town of Vaughan in the Regional Municipality of York, located

south of Mackenzie Drive west of Duff

north of Major Leslie Street and

IN THE MATTER OF
The Municipality of Vaughan
for an order of the Corporation
to rezone Area 6 of the Metropolitan
Plan No. 1624-288
Site and Industrial
on said Plan
Industrial;

to this Board by the Municipality of Vaughan
By-law 2523 of 1976
of Vaughan to amend
6 shown on Department Plan
Valley Landfill from Disposal
Areas 2 and 5
to Disposal

IN THE MATTER OF
Municipal E. Eakins, Minister
request by the Municipality
order amend Corporation
redesignate Metropolitan
No. 1624-288
Industrial;
Minister's File
O.M.B. File

to the Ontario Honourable John
Affairs on a behalf of The
Toronto for an Plan for the
of Vaughan to 5 shown on
Department Plan
al to Disposal

00 A20

IN THE MATTER OF
Municipality of Vaughan
this Board the Town of Vaughan
provision at the purpose
disposing of Areas 2 and
Department

request by The Municipality of
Toronto that the place of
making for the facilities for
dumping and lands shown as
Toronto Works 6.

Mr. Harry Poch

Municipality of
an Toronto

Mr. T. Fraser
Mrs. T.A. Caron

Corporation of the Town of

Mr. Brian Byrnell

Ministry of the Environment

II. LOCATION

The subject lands comprise parts of Lots 23, 24 and 25 in Concession 3, in the Town of Vaughan. More particularly, the lands are located at the eastern boundary of the Keele Valley Landfill site in Lots 23, 24 and 25.

III. BASIS

The Amendment to the Official Plan is based on the following considerations:

- a) The sanitary landfill area was designated by Official Plan Amendment No. 121 to the Official Plan of the Vaughan Planning Area. Amendment No. 121 was approved on April 15, 1981. A subsequent Amendment No. 150 (Maple Community Plan) was adopted by Vaughan Council on May 24, 1983, which affected the designation of the sanitary landfill area and surrounding buffer. This Amendment was approved in part by the Minister of Municipal Affairs and Housing on July 15, 1984, subject to modifications and deferrals. The approval of the portion of Amendment No. 150, dealing with the landfill and buffer area was deferred by the Minister and therefore these lands remain subject to Amendment No. 121.

- b) The Municipality of Metropolitan Toronto owns and operates the Keele Valley Landfill which is located

near the community of Maple, in the Town of Vaughan in the Regional Municipality of York. The landfill receives residential and non-hazardous solid commercial and industrial waste. The site was opened in 1983 and it is anticipated that capacity will be reached in the mid-1990's.

- c) Before waste material is placed in any part of the site, an underlying clay liner is constructed so that the leachate generated by the decomposing garbage can be kept within the site area. For this liner to maintain a low permeability, it is technically preferable that the liner be constructed on a straight line continuous basis, so as to eliminate construction joints caused by changes in alignment.

The eastern boundary of the Keele Valley Landfill site is currently made up of a series of angles. This Amendment will have the effect of allowing the boundary to be realigned in order to simplify the placement of the required landfill liner. Two major benefits are seen by Metropolitan Toronto in the realignment of the boundary. Firstly, it simplifies the survey control required to ensure that the quality of the design sub-grade and liner elevations is maintained. In addition it will allow for more efficient placement and compaction of the liner material. Therefore, the straightening of the

boundary would assist in maintaining the standard of the liner and assist in quality control and monitoring.

d) As background to the proposed Amendment, Metropolitan Toronto has prepared various studies assessing the impact of the boundary realignment. These studies have been consolidated into a document book which may be cited as Metropolitan Toronto Keele Valley Landfill Boundary Alteration (Volumes 1 to 3), Joint Board Hearing Document. It constitutes an examination of the various environmental and operational impacts that the proposal would entail. Included were the following analyses:

- area and volume considerations
- base preparation grades, liner and leachate collection system
- groundwater analysis
- final contours and stormwater management
- odour control
- on-site transportation routes
- land use assessment

No negative inputs of any significance were identified.

2007 01 20

IV. DETAILS OF THE ACTUAL AMENDMENT AND POLICIES RELATIVE
THERE TO

The Official Plan of the Vaughan Planning Area is hereby amended by:

- a) Designating the lands shown as Area 2 and Area 5 on Schedule "1" as "Disposal Industrial Area".
- b) Designating the lands shown as Areas 1, 3, 4 and 6 on Schedule "1" as "Industrial Area".
- c) Amending Schedule "A" to Amendment No. 121 to the Official Plan of the Vaughan Planning Area by incorporating the designations referred to in paragraphs IV a) and b) herein.

V. IMPLEMENTATION

It is intended that the policies of this Amendment shall be implemented through an Amendment to Vaughan By-law No. 2523, as amended.

VI. INTERPRETATION

The provisions of the Official Plan of the Vaughan Planning Area as amended from time to time regarding the interpretation of that plan shall apply with respect to this Amendment.

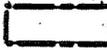
**THIS IS SCHEDULE 'I'
TO AMENDMENT NO. 273**

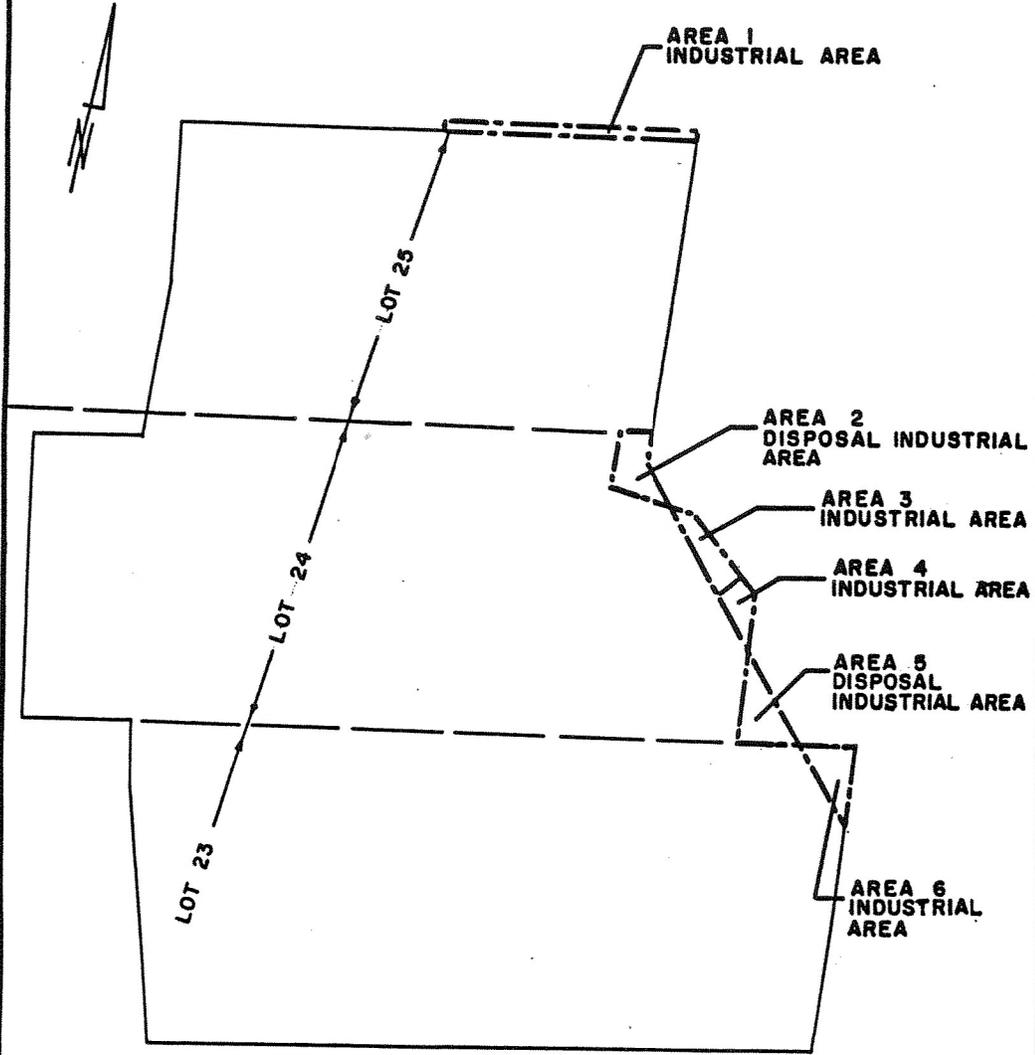
**LOCATION: PART OF LOTS 23,24,25,
CONCESSION 3**

DATE: 88/02/22

LEGEND

NOT TO SCALE

 **LANDS SUBJECT TO
AMENDMENT NO. 273**



(D) Re: Rezoning

Pursuant to Section 34(11) of the Planning Act, 1983 and Section 5(2) of the Consolidated Hearings Act, 1981, the Joint Board orders that Township of Vaughan By-law No. 2523 as amended by By-laws Nos. 205-80, 171-81 and 109-83 of the Corporation of the Town of Vaughan be further amended as follows:

WHEREAS the lands affected by this By-law are now situate in the Corporation of the Town of Vaughan, but by virtue of the Regional Municipality of York Act, remain subject to the provisions of the Township of Vaughan By-law 2523;

AND WHEREAS the matters herein set out are in conformity with the Official Plan for the Vaughan Planning Area and Amendments thereto as and in force at this time;

AND WHEREAS there has been no amendment to the Official Plan for the Vaughan Planning Area proposed by the Council of The Corporation of the Town of Vaughan but not approved at this time with which the matters herein set out are not in conformity;

NOW THEREFORE:

1. By-law 2523 of The Corporation of the Township of Vaughan, as amended by By-laws 205-80, 171-81 and

109-83 of The Corporation of the Town of Vaughan is further amended by:

- a) Rezoning of those lands shown on Schedule "1" hereto as Area 1, Area 3, Area 4 and Area 6 from "Disposal Industrial (M5) Zone" to "Temporary Open Space (OS) Zone" and rezoning of the lands shown on said Schedule "2" as Area 2 and Area 5 from "Temporary Open Space (OS) Zone" to "Disposal Industrial (M5) Zone".

- b) By adding the following paragraphs to Section 25 "Exceptions":
 - i) Notwithstanding any provisions to the contrary, the lands shown as Area 2 and Area 5 on Schedule "1" hereto shall not be used for any purpose except Open Space uses and the receiving, dumping and disposing of solid non-hazardous domestic, commercial and industrial waste in accordance with Provisional Certificates of Approval and Certificates of Approval issued under the Environmental Protection Act that affect said Area 2 and said Area 5.

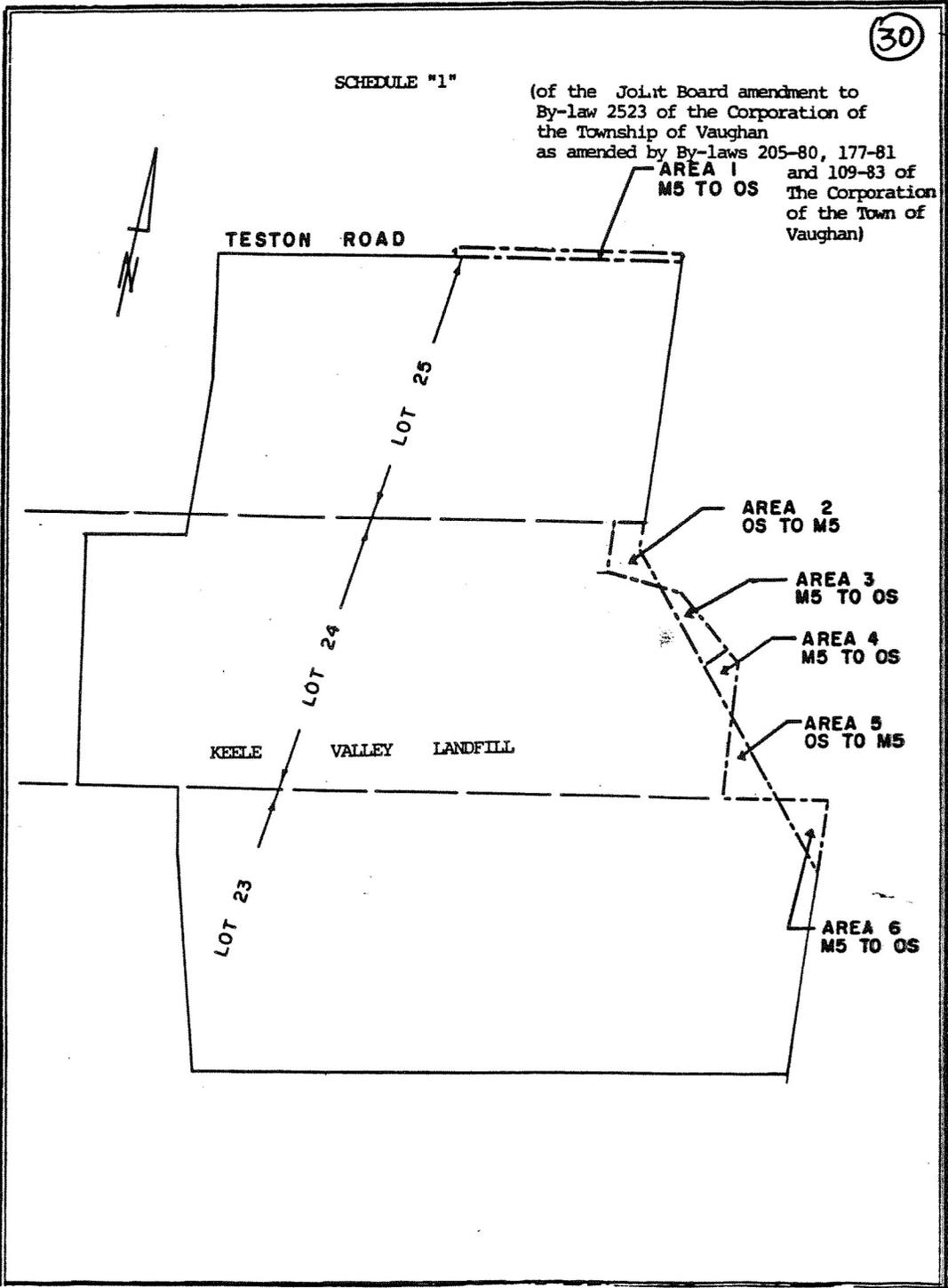
 - ii) Notwithstanding any provisions to the contrary, the lands shown as Area 1, Area 3, Area 4 and Area 6 on Schedule "1" hereto shall not be used for any

purpose except as a primary buffer zone to the Keele Valley Landfill site and for Open Space uses, leachate and gas collection works and other landfill related works in accordance with Provisional Certificates of Approval and Certificates of Approval issued under the Environmental Protection Act that affect said Area 1, Area 3, Area 4 and Area 6.

- c) By amending Key Map 19 in accordance with paragraph (a) herein.

SCHEDULE "1"

(of the Joint Board amendment to By-law 2523 of the Corporation of the Township of Vaughan as amended by By-laws 205-80, 177-81 and 109-83 of The Corporation of the Town of Vaughan)



Dated at TORONTO this 11TH day of APRIL, 1988.

"T.F. Baines"

T.F. Baines, Q.C.
Chairman

"R.B. Eisen"

R.B. Eisen, Q.C.
Member

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283130

IN THE MATTER OF Town of Vaughan By-law 256-81

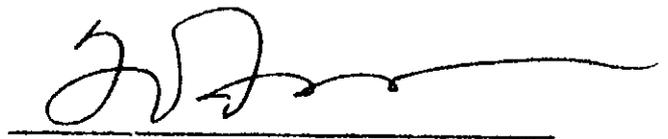
I, THOMAS O. FRASER, of the Municipality of Metropolitan Toronto, Solicitor, do solemnly declare that:

1. I am the Solicitor of The Corporation of the Town of Vaughan and have knowledge of the facts herein deposed to.
2. That the portion of Teston Road which was stopped up and closed by By-law 256-81 is described as follows:

That part of the road allowance between Lots 25 and 26, Concession 3, Town of Vaughan, lying between the easterly limit of Rodinea Road in Registered Plan M-1699, registered in the Land Registry Office for the Land Titles Division of York (No. 65) at Newmarket and a point which is 545 metres (1,788 feet) easterly therefrom.

And I made this solemn declaration conscientiously believing it to be true and knowing it is of the same force and effect as if made under oath, and by virtue of the Canada Evidence Act.

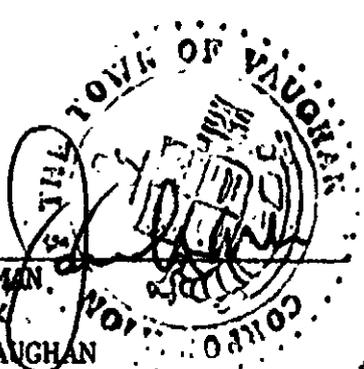
DECLARED BEFORE me at)
 the Town of Vaughan in the)
 Regional Municipality of York)
 this 29th day of October, 1981 A.D.)




 T. O. FRASER, TOWN OF VAUGHAN.

I, FREDERICK GARTH JACKMAN, Town Clerk of the Corporation of the Town of Vaughan in the Regional Municipality of York, do hereby certify that the attached is a true copy of By-law Number 256-81 passed by the Council of the Town of Vaughan on the 19th day of October, 1981.


F.G. JACKMAN
TOWN CLERK
TOWN OF VAUGHAN



The seal of the Corporation of the Town of Vaughan is circular. It features a central emblem with a shield and a crown, surrounded by the text "CORPORATION OF THE TOWN OF VAUGHAN".

DATED at the Town of Vaughan
this 28th day of October, 1981

THE CORPORATION OF THE TOWN OF VAUGHAN

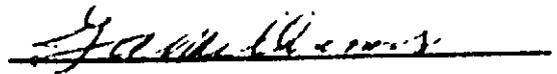
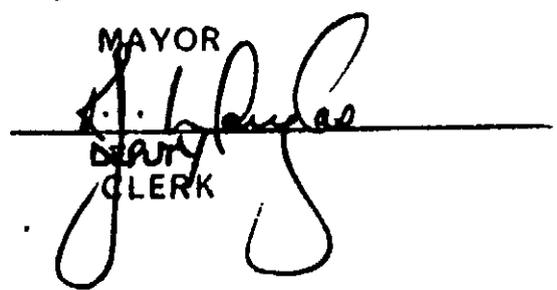
BY-LAW NUMBER 256-81

A By-law to close a highway.

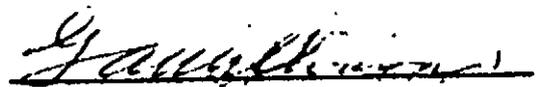
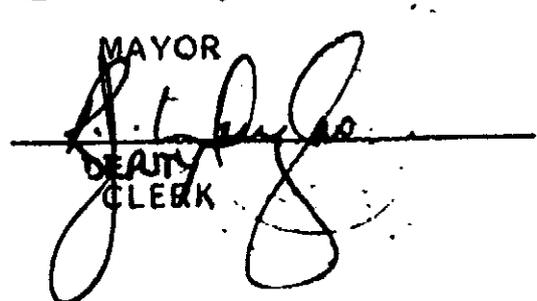
The Council of The Corporation of the Town of Vaughan ENACTS
AS FOLLOWS:

THAT that part of Teston Road from the east limit of Rodinea Road
to a point 545 metres (1,788 feet) easterly be and it is hereby stopped
up and closed.

READ a FIRST and SECOND time this 19th day of October, 1981.


MAYOR

DEPUTY
CLERK

READ a THIRD time and finally passed this 19th day of October,
1981.


MAYOR

DEPUTY
CLERK

283130

283130

my DATED

OCT. 19, 1981

1980

X

No.
Registry Division of York Region (65)
I CERTIFY that this instrument is registered as of

31 NOV 3 P12:01 in the

Land Registry
Office at
Newmarket,
Ontario.

John D. ...
Land Registrar

TOWN OF VAUGHAN

AN ~~...~~

~~...~~ BY-LAW 256-81

FR. RD. ALLOWANCE BETWEEN
LOTS 35 + 36 CONS
VAUGHAN

48A

PROPERTY OF THE
REGISTRY OFFICE
GRANT, GRANT & FRASER
5740 Yonge St. B-10
WILLOWDALE, M2M 3T4

Fee - 15.00

THIS AGREEMENT made in quadruplicate, this 9th day of May, 1983.

B E T W E E N:

THE CORPORATION OF THE TOWN OF VAUGHAN

hereinafter called "Vaughan"

OF THE FIRST PART

- and -

THE MUNICIPALITY OF METROPOLITAN TORONTO

hereinafter called "Metro"

OF THE SECOND PART

WITNESSETH THAT:

WHEREAS Metro has entered into a conditional agreement of purchase and sale to acquire Parts of Lots 21 - 28 inclusive, Concession 3 in the Town of Vaughan (the "lands") more particularly described in Schedule "A" hereto for the purposes of providing facilities for the receiving, dumping and disposing of waste; and

WHEREAS the lands consist of the following:

- 1) 99.15 hectares more or less more particularly described in Schedule "B" (the "Disposal Site"),
- 2) 40.28 hectares more or less more particularly described in Schedule "C" (the "Buffer Area"); and
- 3) 66.37 hectares more or less more particularly described in Schedule "D" (the "Avondale Area"), and

WHEREAS pursuant to the provisions of the Environmental Protection Act, R.S.O. 1980 c. 141, Provisional Certificate of Approval Waste Disposal Site No. A230610 (the "certificate") was issued on September 12, 1980 in respect of the lands; and

WHEREAS the acquisition of the lands by Metro is subject to the approval of Vaughan under subsection 66(3) of the Municipality of Metropolitan Toronto Act R.S.O. 1980 c.314 and subsection 169(8) of the Regional Municipality of York Act, R.S.O. 1980 c.443 both subsections (hereinafter referred to as the "legislation"); and

WHEREAS Vaughan has granted its approval under the legislation on the terms and conditions herein expressed.

APPROVED AS TO FORM

APR 25 1983
REGISTRY

NOW, THEREFORE, in consideration of the premises and the mutual covenants herein expressed, the parties agree as follows:

1. Vaughan approves pursuant to the legislation the acquisition of the lands by Metro for the purposes of providing facilities for the receiving, dumping and disposing of waste and to the use of the lands for such purposes.
2. Vaughan will make any necessary amendments to its official plan and zoning by-law to permit the operation of a landfill disposal site on the disposal site and the extraction of clay from the Avondale Area.
3. (1) Vaughan hereby grants to Metro an easement over and along the lands described in Schedule "E" (the "right of way") for the purpose of transporting clay till from the Avondale area to the disposal site and for the passage of vehicles and persons for all purposes in connection with the establishment of operation of the landfill disposal site.

(2) Metro shall construct and maintain a fence on the east limit of the right of way together with gates to the satisfaction of Vaughan with all gates providing public access to the right of way equipped with a locking device and locked at all times during which landfill operations are not occurring.

(3) Metro shall construct the right of way and maintain it and the portion of Teston Sideroad lying to the east of the right of way to the satisfaction of Vaughan.

(4) Metro shall ensure that all vehicles and equipment engaged in transporting clay till from the Avondale Area to the disposal site or returning empty from the site use the right of way and do not use Keele Street.

(5) Metro shall indemnify and save harmless Vaughan from any loss or liability which it may incur arising directly or indirectly from Metro's use of the right of way and Teston Sideroad.

(6) Vaughan may terminate Metro's right to use the right of way by giving it six (6) months' notice in writing; provided that the Town may only terminate if it grants an alternative right of way to Metro over a strip of land twenty metres in width which runs easterly from the east limit of the lands shown as Part 6 Reference Plan 65R-5832 adjacent to the north limit of the lands shown as Part 9 Reference Plan 65R-5832 a distance of one hundred and sixty-one metres. All of the provisions of this clause 3 referring to the construction, use and maintenance shall apply to the new right of way.
4. (1) Vaughan hereby grants to Metro an easement or right in the nature of an easement to enter on the lands described in Schedule "F" (the "easement") for the purposes of constructing

and maintaining purge and observation wells (the "wells"). Metro acknowledges that Vaughan proposes to change the elevation of the Teston Sideroad and the said lands and that Metro will be responsible for any resulting changes to the wells, pipes and appurtenances. Upon completion of the purchase, Metro shall convey to Vaughan, without payment, the lands shown as Part 10 on Reference Plan 65R-5491 which are required for the reconstruction of the Teston Sideroad.

(2) Metro shall indemnify and save harmless Vaughan from any claim or demand arising directly or indirectly from the installation and operation of the wells.

5. (1) In this clause the initial period shall be the period of time from the date in the year in which waste is first deposited on the disposal site until December 31st in that year or, if waste is first deposited on the disposal site after June 30th, then until December 31st in the following year.

(2) Subject to clause 7, Metro shall pay Vaughan 33.07 cents for each tonne of waste deposited on the disposal site.

(3) Subject to sub-clause 4, at the end of the initial period and at the end of each year thereafter, the cost per tonne to Metro under sub-clause 2 for the following year shall be increased or decreased by an amount of the per centage change in the Consumers' Price Index published by the Federal Bureau of Statistics (the "index") over the period from the time the rate to be adjusted commenced to be payable to the date of adjustment.

(4) Payments by Metro shall be made half yearly in arrears, and are due and payable within thirty (30) days after June 30th and December 31st during each year in which waste is deposited on the site.

(5) Metro shall provide to Vaughan with each payment a statement showing the method of calculating the payment.

(6) Vaughan shall have reasonable access to the records of Metro including the records kept by Metro for the Ministry of the Environment to determine the amount or accuracy of any payment owing to Vaughan under this agreement.

6. (1) In this clause the price per tonne posted at the gate (the "gate price") is the price per tonne charged to private waste haulers as determined by Metro from time to time to deposit waste on the disposal site.

(2) Vaughan shall pay to Metro the gate price for any waste it deposits on the disposal site.

(3) Metro shall pay to Vaughan within thirty (30) days after December 31st in each year during which the disposal site is accepting refuse an amount calculated by multiplying the gate price times 2.3 times 365 times the population of Vaughan and dividing the products by 2204.6.

(4) For the purposes of the calculation under sub-clause (3):

- (a) the population of Vaughan shall be determined by the York Regional Assessment records;
- (b) if the population or the gate price changes in a calendar year, monthly figures shall be averaged;
- (c) the population of Vaughan shall be deemed not to exceed 50,000 and
- (d) if the disposal site is not accepting refuse during the whole of a calendar year, the payment shall be apportioned.

7. (1) Metro shall be entitled to deduct and retain from each payment due and owing under clause 5, an amount equal to fifty (50%) per cent of such payment until the total amount so deducted is equal to the sum of One Million Three Hundred and Fifty Thousand Dollars (\$1,350,000.00).

8. (1) In the event that legislation is enacted establishing an authority other than Metro to control the gate price, payments under clause 5 shall be reduced to the extent that such authority fails to give full recognition to the obligation of Metro to make such payments.

(2) The onus shall be on Metro to establish that the authority has failed to give full recognition to the obligation of Metro to make such payments.

(3) In any negotiations with the authority Vaughan may participate and Metro shall take the position that the payments under clause 5 are fixed costs.

(4) Metro shall exercise any rights of appeal from the decision of the authority which fails to give full recognition to the obligations of Metro to make such payments and Vaughan may, if otherwise permitted, be a party to such appeal.

9. (1) Metro shall use its best efforts to ensure that all trucks enter and leave the disposal site without passing through the intersection of Keele Street and Major Mackenzie Drive (the "intersection").

(2) Metro shall

- (a) include a provision in contracts it enters for

the haulage of waste to the disposal site that if a truck engaged under the contract is found passing through the intersection, the truck may be refused admission to the disposal site or the contract cancelled.

- (b) post signs at the entrances to the disposal site stating that the intersection shall be avoided and that refusal to do so shall result in refusal of entry to the disposal site.
- (c) refuse entry to any truck that Vaughan has advised the gatekeeper in writing, on that day and the prohibition shall continue for such period as Metro in its discretion deems advisable.

(3) Vaughan shall be responsible for monitoring the intersection.

(4) The only access roads to the Disposal Site which shall be used by disposal trucks are:

- (1) The existing road from Keele Street over Parts 18, 27, 28, 29 and 30 on Reference Plan 65R-5832;
- (2) The existing access off Major Mackenzie leading to the Superior weigh scale;
- (3) The proposed road shown as Part 42, Plan 65R-5832;
- (4) Such other access points approved by Vaughan.

10. (1) Subject to sub-clause 2, upon completion of the Disposal Site in accordance with the certificate, Metro shall convey the disposal site to Vaughan if so required by Vaughan for the sum of ONE (\$1.00) DOLLAR.

(2) Metro may retain or reserve from the conveyance provided for in sub-clause 1

- (a) the right to extract, collect and sell methane gas, and
- (b) easements or rights in the nature of easements to construct, install and maintain pipes and equipment appurtenant thereto for the extraction and collection of methane gas. No structure shall be erected unless required by the Ministry of the Environment or other governmental authority.

(3) If within six (6) years from the date of acquisition of the Disposal Site Metro shall cease to operate the Disposal Site and reconvey it to Superior-Crawford Sand & Gravel Limited and W.M.I. Waste Management of Canada Inc. in accordance with the terms of the Agreement of Purchase and Sale the obligation of Metro to convey the completed site to Vaughan shall be null and void.

(4) Vaughan acknowledges that the Avondale Area shall not be conveyed by Metro to Vaughan.

11.(1) Prior to completion of the site and after the completion of a part thereof, Metro shall at Vaughan's request lease to Vaughan such completed part for public purposes at a rental of ONE (\$1.00) DOLLAR per year provided that, in the opinion of the Commissioner of Works for Metro, such use will not interfere with the use of the remainder of the Disposal Site for landfill purposes, disturb the final cover, or be incompatible with the end use of the disposal site. Metro shall cut the grass, weeds and maintain all of the site except for any part that has been conveyed or leased to Vaughan.

(2) The lease under sub-clause (1) shall require that Vaughan indemnify and save harmless Metro from any claim or demand arising directly or indirectly from the possession or use of the lands under the lease.

12. The final contours established for the completed disposal site shall be subject to the approval of Vaughan provided that such approval shall not result in a significant reduction of the approved capacity of the site.

13. Metro shall not remove any forested lands for the purpose of sanitary landfill without the approval of Vaughan.

14.(1) Vaughan hereby approves connection to the York-Durham sewage system and Metro acknowledges that the approval of the Regional Municipality of York is required to the connection and to the allocation of sewage capacity.

(2) Metro agrees to install and maintain a flow measuring device approved by Vaughan to measure the quantity of waste discharged into the sewage system.

(3) Metro agrees to pay to Vaughan the sewage service rate set forth for Metered Account in Vaughan By-law 12-74, as amended, or any subsequent amendment thereto for each 1000 gallons of waste entering the sewage system as measured by the flow measuring device provided that Vaughan shall, at the request of Metro, amend the said By-law or any amendment or replacement thereof so as to permit the entering into of an agreement permitting the discharge of sewage in excess of the limits therein set forth.

(4) Upon amending the said By-law in accordance with sub-clause 3, Vaughan shall, at the request of Metro, enter an agreement in the form annexed as Schedule "G" hereto.

(5) Vaughan acknowledges that the rate in accordance with sub-clause 3 at the date hereof is 95 cents per thousand gallons.

15. Metro shall pay to Vaughan on or before the 31st day of December in each year in which it is accepting refuse on the site a sum of money equal to the amount which would have been payable by Waste Management in such year for municipal taxes, including business taxes, if Waste Management had been operating the site and if the site was operated for only a portion of the year the payment shall be pro-rated accordingly.

16. Any notice pursuant to this agreement shall be deemed to have been given when personally delivered to a party at the address noted below or 72 hours after being mailed to that address by prepaid registered mail.

The Corporation of The Town of Vaughan
2141 Major Mackenzie Drive
Maple, Ontario
L0J 1E0

Metropolitan Clerk
The Municipality of Metropolitan Toronto
2nd Floor, City Hall
Toronto, Ontario
M5H 2N1

17. This agreement shall be null and void if Metro does not acquire the lands.

18. This agreement is subject to the approval of the Ontario Municipal Board.

19. This agreement shall enure to the benefit of and be binding upon the parties hereto and their respective successors and assigns.

IN WITNESS WHEREOF the parties hereto have hereunto affixed their corporate seals, attested to by the hands of their proper officers duly authorized in that behalf.

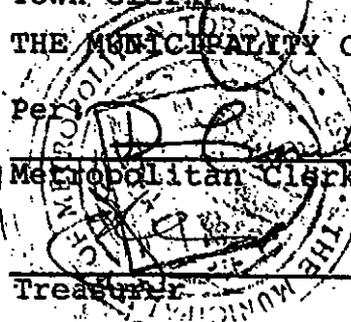
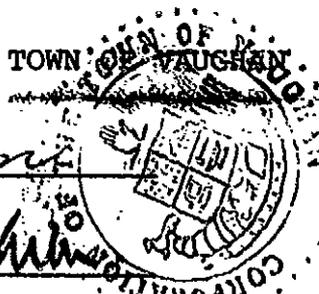
SIGNED, SEALED AND DELIVERED

[Signature]
in the presence of
Authorized by Report No. 25(1)
of the Executive Committee
adopted in Council on the 3rd
day of Sept. 1981

[Signature]
Deputy Metropolitan Clerk
Authorized by Report No. 4(41)
of the Works Committee adopted in
Council on the 15th day of
March, 1983

[Signature]
Deputy Metropolitan Clerk

) THE CORPORATION OF THE TOWN OF VAUGHAN
) Per: *[Signature]*
) Mayor
) *[Signature]*
) Town Clerk
) THE MUNICIPALITY OF METROPOLITAN TORONTO
) Per: *[Signature]*
) Deputy Metropolitan Clerk
) *[Signature]*
) Deputy Treasurer



Schedule "A"

(All the lands to be acquired by
the Metropolitan Corporation)

FIRSTLY:

ALL those portions of Lots 22, 23, 24, 25, 27 and 28, in Concession 3 in the Town of Vaughan in the Regional Municipality of York, defined as Parts 1, 10, 11, 16, 17, 22, 41, 52 and 59 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

SUBJECT to a right-of-way, as set out in Instrument No. 62581, over along and upon the portion of said Lot 23, Concession 3 designated as Part 22 on the aforesaid Reference Plan.

SECONDLY:

A parcel of land in the Town of Vaughan, in the Regional Municipality of York, being composed of all of Block W, in Plan M-1699 registered in the Land Titles Office for the Land Titles Division of York Region.

The above firstly and secondly described lands comprise an area of 222.1 hectares, be the same more or less.

SCHEDULE "B"

(Disposal Site)

ALL those portions of Lots 23, 24 and 25 in Concession 3, in the Town of Vaughan, in the Regional Municipality of York, defined as Parts 10 and 17 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

The above described parcel of land comprises an area of 99.15 hectares, be the same more or less.

SCHEDULE "C"

(Buffer Area)

FIRSTLY:

ALL those portions of Lots 22, 23, 24 and 25 in Concession 3, in the Town of Vaughan, in the Regional Municipality of York, defined as Parts 11, 16, 22 and 41 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

SUBJECT to a right-of-way, as set out in Instrument No. 62581, over, along and upon the portions of said Lot 23, Concession 3, designated as Part 22 on the aforesaid Reference Plan.

SECONDLY:

A parcel of land in the Town of Vaughan, in the Regional Municipality of York, being composed of all of Block W, in Plan M-1699 registered in the Land Titles Office for the Land Titles Division of York Region.

The above firstly and secondly described land comprises an area of 40.28 hectares, be the same more or less.

SCHEDULE "D"

(Avondale Site)

ALL those portions of Lots 27 and 28 in Concession 3, in the Town of Vaughan in the Regional Municipality of York, defined as Parts 1 and 59 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

Together with a right-of-way in common with others entitled thereto, over, along and upon the portion of said Lot 27, Concession 3, defined as Parts 57 and 58 on the aforesaid Reference Plan.

The above described parcel of land comprises an area of 66.37 hectares, be the same more or less.

SCHEDULE "E"

(Right-of-way from Avondale
Site to Disposal Site)

ALL those portions of Lots 25 and 26 and of the Road Allowance between said Lots 25 and 26 all in Concession 3, in the Town of Vaughan, in the Regional Municipality of York, designated as Parts 6, 9 and 51 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

The above-described parcel of land comprises an area of 3.083 hectares, be the same more or less.

SCHEDULE "F"

(Easement for purge
wells on Teston Road)

ALL those portions of Lot 26, in Concession 3, in the Town of Vaughan, in the Regional Municipality of York, defined as Parts 8 and 53 on a Reference Plan deposited in the Land Registry Office for the Registry Division of York Region (No. 65) as Plan 65R-5832.

The above-described parcel of land comprises an area of 1.801 hectares, be the same more or less.

2. During the currency of this agreement only, the quality of the waste water discharged by Metro from the said premises to the sanitary sewer system may exceed the limits set by the By-law with respect to the quantity of B.O.D., phenolic equivalents, Iron as Fe and Chlorides as Cl provided that they shall not exceed the following limits at any time:

- (a) B.O.D. 10,000 mg/L
- (b) Iron as Fe 200 mg/L
- (c) Chlorides as Cl 5,000 mg/L

3. The discharge of waste water by Metro from the said site containing B.O.D., Iron as Fe or Chlorides as Cl in excess of the above limits shall constitute a contravention of this agreement and thus a contravention of the By-law.

4. This agreement shall remain in force for a period of one year from _____ and thereafter be automatically renewed on the same terms from year to year unless a new agreement is reached or this agreement is terminated as hereinafter provided.

5. This agreement may be terminated by the Municipality at any time on three months' written notice sent by registered mail addressed to the Clerk of Metro, if in the opinion of the Municipality:

- (i) the effluent is causing damage to the sewers, materially increasing their maintenance costs or causing a dangerous condition; or
- (ii) the effluent is causing damage to the sewage treatment process or causing a dangerous condition in the treatment works.
- (iii) if damage is thereby caused to the sewers the damaged sections shall be replaced at Metro's expense.

6. This agreement may be terminated by Metro at any time on three months' written notice sent by registered mail addressed to the Clerk of the Municipality.

7. In the event of a renewal if the Municipality gives written notice sent by registered mail to Metro as aforesaid at any time within one month before or after the renewal date, that the amount of the fee or any of the limits hereinbefore set out are to be changed and no new agreement can be reached between the Municipality and Metro, this agreement may be terminated at the option of the Municipality at any time without notice three months after the registered notice was sent.

8. Except as herein otherwise expressly provided Metro shall conform to the provisions of the said By-law of the Municipality relating to the discharge of sewage or land drainage, and in the event of termination of this agreement Metro shall conform to provisions of the said By-law.

9. Metro shall pay to the Municipality a fee for waste entering the sewage system which exceeds prescribed limits as set out in the following formula:

Surcharge Formula

Annual Surcharge in Dollars = $V \times G \times F \times C$

Where V = annual sewage discharge in m^3

G = excess B.O.D., Iron or Chloride in mg/L whichever is the greatest over the respective By-law limits.

F = 10^{-3} factor converting mg/L to kg/m^3

C = treatment cost, \$0.121/kg excess pollutant "G"

The payments shall be made quarter yearly on the last days of March, June, September and December and in each year of any renewal until terminated as herein provided.

10. Metro shall pay to the Municipality on demand interest on overdue amounts at the rate of 7% per annum for each month or part of a month that the amount is overdue.

This agreement shall enure to the benefit of and be binding upon the heirs, executors, administrators, successors and assigns of the parties hereto.

IN WITNESS WHEREOF the parties hereto have hereunto affixed their Corporate Seals attested to by the hands of their respective proper officers in that behalf duly authorized.

SIGNED, SEALED AND DELIVERED) THE CORPORATION OF THE TOWN
in the presence of:) OF VAUGHAN
)
)
) _____
) Mayor
)
) _____
) Clerk
)
)
)
) THE MUNICIPALITY OF METROPOLITAN
) TORONTO
)
) _____
) Metropolitan Clerk
)
) _____
) Treasurer
)

No. **320409**

260 **320409**

Registry Division of York Region (95)
I CERTIFY that this instrument is registered as of
M.

DATED

1983.

83 JUL 7 **11:28**

in the

THE CORPORATION OF THE TOWN
OF VAUGHAN

AND

THE MUNICIPALITY OF
METROPOLITAN TORONTO

Land Registry
Office at
Newmarket,
Ontario.

John R. [Signature]
Land Registrar

AGREEMENT

Plots 22, 23, 24, 25, 27 + 28, Cons. 3, Yon.

cash
154

fee 25.00

AG JOY. (S.C.)
New City Hall
Toronto

PROPERTY OF THE
REGISTRY OFFICE

(Signature)

Transfer/Deed of Land

CAKeware Inc.
(416) 367-0800
08/1993

A

Form 1 - Land Registration Reform Act

PROPERTY OF REGISTRY OFFICE

Province of Ontario

Number **675034**
CERTIFICATE OF REGISTRATION

1996 APR -2 P 12:08

YORK REGION
13. 65
1357 MARKET

[Signature]
1700 Regis

New Property Identifiers

Additional: See Schedule

Executions
[Signatures]
Additional: See Schedule

FOR OFFICE USE ONLY

(1) Registry Land Titles (2) Page 1 of 3 pages **DW**

(3) Property Identifier(s) Block Property Additional: See Schedule

(4) Consideration
Two dollars Dollar \$ 2.00

(5) Description This is a: Property Division Property Consolidation
Part of Lots 25 and 26, Concession 3 and part of road allowance between Lots 25 and 26, Concession 3, designated as Parts 9 and 10 on Reference Plan 65R-5832
City of Vaughan,
Regional Municipality of York
Registry Division of York Region, (No. 65)
Subject to easement over Part 9 on Reference Plan 65R-5832 as set out in Schedule E of Instrument No. 320409.

(6) This Document Contains (a) Redescription New Easement Plan/Sketch (b) Schedule for: Description Additional Parties Other (7) Interest/Estate Transferred ~~Fee Simple~~ Permanent Easement

(8) Transferor(s) The transferor hereby transfers the land to the transferee

Name(s) THE CORPORATION OF THE CITY OF VAUGHAN

Signature(s) *[Signature]* Date of Signature Y M D 1996 3 12

Per: VICTORIA LESKIE
Name: DEPUTY CITY CLERK
Title:

I/We have authority to bind the corporation

(9) Spouse(s) of Transferor(s) I hereby consent to this transaction

Name(s) Signature(s) Date of Signature Y M D

(10) Transferor(s) Address 2141 Major McKenzie Drive, Vaughan, Ontario L6A 1T1 for Service

(11) Transferee(s)

THE MUNICIPALITY OF METROPOLITAN TORONTO
Authorized by Report No. 16(B) of the Environment and Public Space Committee adopted in Council on the 25th day of October, 1995.

Per: *[Signature]* Date of Birth Y M D
Name: R. WALTON
Title: DEPUTY METROPOLITAN CLERK

Per: *[Signature]* 1996 03 22
Name: LOUISE EASON
Title: METROPOLITAN TREASURER

(12) Transferee(s) Address 55 John Street, Station 1260, Metro Hall, Toronto, Ontario M5V 3C8 for Service

(13) Transferor(s) The transferor verifies that to the best of the transferor's knowledge and belief, this transfer does not contravene section 50 of the Planning Act.

Signature _____ Date of Signature Y M D

Solicitor for Transferor(s) I have explained the effect of section 50 of the Planning Act to the transferor and I have made inquiries of the transferor to determine that this transfer does not contravene that section and based on the information supplied by the transferor, to the best of my knowledge and belief, this transfer does not contravene that section. I am an Ontario solicitor in good standing.

Name and Address of Solicitor _____ Signature _____ Date of Signature Y M D

(14) Solicitor for Transferee(s) I have investigated the title to this land and to abutting land where relevant and I am satisfied that the title records reveal no contravention as set out in subclause 50(22)(c)(i) of the Planning Act and that to the best of my knowledge and belief this transfer does not contravene section 50 of the Planning Act. I act independently of the solicitor for the transferor(s) and I am an Ontario solicitor in good standing.

Name and Address of Solicitor _____ Signature _____ Date of Signature Y M D

(15) Assessment Roll Number of Property City. Mun. Map Sub. Par. NOT ASSIGNED

(16) Municipal Address of Property Not Assigned

(17) Document Prepared by:
Jerry Pimentel 2400-067-203 1995
The Municipality of Metropolitan Toronto
Legal Department
H.W.O. Doyle, Metropolitan Solicitor
55 John Street, Metro Hall
Station 1260, 26th Floor
Toronto, Ontario M5V 3C8

FOR OFFICE USE ONLY

Fees and Tax	
Registration Fee	50 -
Land Transfer Tax	EASE
Total	50 -

THE TRANSFEROR AND TRANSFEREE HEREBY COVENANT AND AGREE AS FOLLOWS:

WHEREAS the Transferee requires an easement across the lands described in Box (5) above, owned by the Transferor (hereinafter called the "Property"); and

WHEREAS the Transferor has agreed to grant, convey and confirm an easement or rights in the nature of an easement in the Property to the Transferee for the purpose of a Gas Balancing Header Pipe and similar devices (hereinafter called the "Pipe") required for the collection of landfill gas at the Keele Valley Landfill Site.

NOW THEREFORE THIS INDENTURE WITNESSETH that in consideration of the premises and of the covenants and agreements hereinafter contained and the sum of TWO DOLLARS (\$2.00) now paid by the Transferee to the Transferor (the receipt of which is hereby acknowledged), the Transferor hereby grants, confirms and conveys unto the Transferee its employees, workers, agents, successors and assigns, the right, licence, easement or rights in the nature of an easement to enter at any time upon the Property with all necessary plant, machinery, tools, implements and materials as may be necessary for the purpose of the construction, operation, use, inspection, repair, maintenance, alteration, reconstruction of the said Pipe, together with permission at all times for the Transferee, its successors and assigns, its agents, servants, contractors, employees and workers to enter in, upon, under and across the Property with all necessary plant, machinery, tools, implements and materials as may be necessary for such purposes in connection with the said Pipe or any part thereof or for any other lawful purpose in connection therewith.

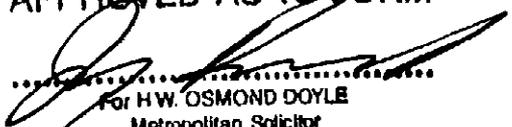
The Transferor hereby undertakes and agrees that the Property shall remain clear and unencumbered of buildings or structures and free of physical encumbrances which would adversely impact on access, use or enjoyment of the Property by the Transferee, its servants, or its agents, it being expressly intended that after the date of this agreement the Transferor shall not be entitled to erect or place or caused to be erected or placed on the Property, buildings, structures, pavements, physical encumbrances or obstructions unless the Commissioner of Works for the Transferee, upon written application by the Transferor, permits in writing the existence of certain physical encumbrances or other works on the Property, for limited periods of time, on such terms and conditions as are determined by the said Commissioner.

For the purpose of maintenance and safety of the said Pipe, the Transferor shall not be entitled to deposit fill nor to remove existing earth from or on the Property without the approval in writing, including terms and conditions, of the Commissioner of Works of the Transferee.

The Transferee hereby covenants and agrees with the Transferor that:

1. It shall construct the Pipe as close as possible to the south limit of the Teston Road road allowance, in order to minimize possible conflicts with the future construction of Teston Road.
2. It shall be responsible for any alterations, relocation or removal of the Pipe which may be required for the future construction of Teston Road.
3. It shall make provision on the Pipe at no cost to the Transferor for the possible future connection of a landfill gas pipe from the Transferor's old landfill north of Teston Road.
4. On completion of any of the work set out above it will restore the said lands, ss nearly as is reasonably possible, to the conditions existing prior to such work being undertaken.
5. It will at all times, and at its expense, keep and maintain its Pipe (both existing and future) required for the collection of landfill gas at the Keele Valley Landfill Site located within the Property in a safe condition and good state of repair.
6. It shall at all times carry out any construction, maintenance, repairs or replacement required or resulting in any way, either directly or indirectly, from the installation of the Pipe and related appurtenances or use of the easement area.
7. It will from time to time, at its expense, repair any erosion or deterioration of the lands described herein required by reason of the existence, use, inspection, maintenance, repair, alteration or reconstruction of its Pipe located within the said Property.
8. It will indemnify and save harmless the Transferor in respect to any damage, injury or loss caused to any person or property resulting from the construction, operation, use, inspection, repair, maintenance, alteration, reconstruction of the said Pipe or any of the works in respect thereof.
9. The rights, easements and privileges granted herein are subject to any prior rights, easements and privileges affecting the herein described lands and the Transferee agrees to be bound by all the conditions of such prior rights, easements and privileges.
10. The Dominant Tenement benefitted by this easement consists of the lands and easements owned by the Transferee which comprise the Keele Valley Landfill Site.

APPROVED AS TO FORM


.....
For H.W. OSMOND DOYLE
Metropolitan Solicitor

Refer to all instructions on reverse side.

IN THE MATTER OF THE CONVEYANCE OF Part of Lots 25 and 26, Concession 3 and part of road allowance between Lots 25 and 26, Concession 3, designated as Parts 9 and 10 on Reference Plan 65R-8832, City of Vaughan, Regional Municipality of York

BY The Corporation of the City of Vaughan

TO The Municipality of Metropolitan Toronto

I, Janet A. Ross

MAKE OATH AND SAY THAT:

- 1. I am (place a clear mark within the square opposite that one of the following paragraphs that describes the capacity of the deponent(s)): (a) A person in trust... (b) A trustee... (c) A transferee... (d) The authorized agent or solicitor acting in this transaction for The Municipality of Metropolitan Toronto... (e) The President, Vice-President, Manager, Secretary, Director, or Treasurer... (f) A transferee described in paragraph (i)...

4. THE TOTAL CONSIDERATION FOR THIS TRANSACTION IS ALLOCATED AS FOLLOWS:

Table with 3 columns: Description, Amount, and Allocation. Rows include: (a) Monies paid or to be paid in cash (2.00), (b) Mortgages (nil), (c) Property transferred in exchange (nil), (d) Securities transferred (nil), (e) Liens, legacies, annuities (nil), (f) Other valuable consideration (nil), (g) VALUE OF LAND, BUILDING, FIXTURES AND GOODWILL SUBJECT TO LAND TRANSFER TAX (2.00), (h) VALUE OF ALL CHATTELS (nil), (i) Other consideration (nil), (j) TOTAL CONSIDERATION (2.00).

All blanks Must be Filled in. Insert "Nil" Where Applicable.

- 5. If consideration is nominal, describe relationship between transferor and transferee and state purpose of conveyance. (see instruction 8) Easement to a Municipality for the collection of landfill gas.
6. If the consideration is nominal, is the land subject to any encumbrance? No
7. Other remarks and explanations, if necessary. No

Sworn before me at the the City of Toronto in the Municipality of Metropolitan Toronto this 1st day of April 1996

Jeannine Sousa Pimontal, a Commissioner of the Municipality of Metropolitan Toronto, for the Municipality of Metropolitan Toronto

Signature of Janet A. Ross

Janet A. Ross (signature)

Property Information Record

- A. Describe nature of instrument: Permanent Easement
B. (i) Address of property being conveyed (if available): Not Assigned
(ii) Assessment Roll No. (if available): NOT ASSIGNED
C. Mailing address(es) for future Notices of Assessment under the Assessment Act for property being conveyed (see instruction 7): Metropolitan Commissioner of Finance, 65 John Street, 14th Floor, Metro Hall, Toronto, Ontario M5V 3C6
D. (i) Registration number for last conveyance of property being conveyed (if available)
(ii) Legal description of property conveyed; Same as in D.(i) above. Yes [] No [] Not Known [X]
E. Name(s) and address(es) of each transferee's solicitor: Janet A. Ross

For Land Registry Office Use Only
Registration No.
Registration date
Land Registry Office No.

The Municipality of Metropolitan Toronto Legal Department, H.W.O. Doyle, Metropolitan Solicitor 65 John Street, Metro Hall, Station 1260, 26th Floor, Toronto, Ontario M5V 3C6

School Tax Support (Voluntary Election) See reverse for explanation

- (a) Are all individual transferees Roman Catholic? Yes [] No []
(b) If Yes, do all individual transferees wish to be Roman Catholic Separate School Supporters? Yes [] No []
(c) Do all individual transferees have French Language Education Rights? Yes [] No []
(d) If Yes, do all individual transferees wish to support the French Language School Board (with its establishment)? Yes [] No []

NOTES: As to (c) and (d) the land being transferred will be assigned to the French Public School Board or Sector unless otherwise directed in (c) and (d).

August 12, 2025

VIA EMAIL ONLY TO: Lynda.Mulcahy@toronto.ca

City of Toronto
Solid Waste Management Services
7 Eaglet Court
Vaughan ON L6A 4E2

Attention: Ms. Lynda Mulcahy, Manager – Closed Landfill Operations

RE: York Region's Response to City of Toronto's January 31, 2025 Comments on the Teston Road Area Draft Individual Environmental Assessment (IEA) Report
Our File: T02 99816 EA Corr

Dear Lynda,

York Region appreciates the comments received from the City of Toronto (City) and your participation in the Teston Road Area Improvements Individual Environmental Assessment (IEA), now being referred to as a Comprehensive Environmental Assessment (CEA), process. The following is a response to your letter dated January 31, 2025.

We have prepared this letter as a summary response to several key issues and also attach specific responses to the 88 individual comments included in the Attachment A of your recent letter (See Table 1 attached). All comments are considered constructive and have been reflected in a revised and strengthened CEA report.

York Region continues to make every effort to respond to and address concerns that have been raised by the City of Toronto over the course of the Teston Road Area Improvements CEA study. Of note, this has included preparing a revised two-phase plan for both a long term (ultimate) and a near term (interim) recommended design plan for Teston Road between Keele Street and Dufferin Street in response to, primarily, the City of Toronto's concerns about potential impacts to the Keele Valley Landfill (KVL) site.

As noted in our February 15, 2022, meeting, and our previous correspondence to you of May 17, 2022, the interim design for the Preferred Teston Road Alignment 4E is proposed to pass between the KVL and the former Vaughan Township Landfill (VL) with a modified (narrow) roadway cross section. The proposed cross section (with no south side active transportation facilities, only a multi-use pathway on the north side, reduced boulevards on both north and sides, and, with short retaining walls where needed) can, for the most part avoid, encroachment onto City of Toronto property at the Keele Valley Landfill. Long term protection will be made in these areas for an ultimate full-width cross-section in keeping with the Region's 36 m standard right-of-way.

Based on the information provided to date from the City, we do not foresee any significant impacts to the KVL Teston Road Purge Well System (TPWS), although some impacts to the monitoring wells and landfill gas system are expected as noted below. The Preferred Alignment does not cross on top of the KVL with the area of the Approved Limit of Waste – although a grading easement is proposed on City of Toronto property east of the Approved Limit of Waste on the west valley slope of the Don River West Branch. In addition, the intent of the design is to leave the existing KVL service roads in place and to maintain both existing northern accesses with minor reconfigurations at the road connections with Teston Road.

A. Consultation

The consultation record in Table 3-6 has been updated to include the November 29, 2023, meeting with the City of Toronto and its consultants and the follow-up correspondence and slides have been included in Appendix C.6. The City's input at that meeting – in particular regarding landfill gas generation, mobility

and considerations for design; details of the Teston Road Purge Well System; and selected borehole logs from the Teston Road Purge Well System (showing the presence of waste in the vicinity of the Teston Road right-of-way) is documented in the CEA report.

B. Description of the Environment (Existing Conditions)

a) Legal Review of Land Boundaries and Covenants

York Region is undertaking a legal review of the land boundaries and covenants on lands within and adjacent to the Preferred Alignment Alternative (4E) for Teston Road within Section 2 of the corridor in the vicinity of the Keele Valley Landfill. Land boundaries, including landfill buffer zones and easements, are discussed in detail in Appendix L – Hydrogeology Report and Appendix O – now called the Soil, Waste, and Landfill Gas Report, and text on the previous landfill related road closure, easement agreements and property encumbrances has been added to Section 5.4.2 Land Ownership within the Existing Conditions section of the CEA report.

b) MECP D-4 Land Use On or Near Landfills and Dumps (1994) Guideline

As you noted in your letter, the Approved Terms of Reference (Page 25) references Ministry of Environment Conservation and Parks (MECP) Guideline, “D-4 Land Use On or Near Landfills and Dumps (1994)”, in the paragraph below:

- The closed Keele Valley Landfill area south of the Teston Road right-of-way, and Vaughan Waste Disposal site and the Disposal Services Landfill on the north side of the Teston Road right-of-way, shown as yellow area #2 in Figure 4-5, fall under MECP guidelines. These guidelines state that no land use change may take place within 30 m of its perimeter, where technical controls for leachate, or leachate and gas surrounding a fill area are required (MECP, D-4 Land Use on or Near Landfills and Dumps, Section 5.2). These measures are required to protect the integrity of the clay liner of the Keele Valley Landfill site and gas and leachate systems surrounding the fill area (Keele Valley Landfill Site Approvals and Closure Plan). As noted in the Vaughan OP 2010 Amendment 535, new policies regarding land use in the vicinity of the Keele Valley Landfill site which comply with the closure have been introduced in the form of the Maple Valley Plan. The purpose of this plan is to combine the approximate 254 hectares between the Keele Valley and other landfills, along with former MNRF lands to create a major city park incorporating open space/parkland, sports and recreation facilities (potentially a golf course), children’s play areas and picnic areas.

In response to your request, we have included a summary in both the CEA Report and Appendix L - Hydrogeology Report, describing the purpose of MECP’s D-Series (D-1 to D-4) Guidelines, their applicability to the three landfill sites, the extent to which the proposed Teston Road project complies (or conflicts) with the Guidelines and how the Region has committed to and proposes to address / mitigate any potential conflicts or issues.

While not all objectives of the D-Series Guidelines can be met (e.g. maintaining a 20 m to 30 m buffer from technical controls for, respectively, landfill gas or leachate – See Attachment #2)), York Region commits to working with the landfill owners and MECP to reasonably mitigate and/or address any impacts or issues of concern.

c) KVL Landfill Gas Infrastructure Omitted from Draft CEA Report – Implications for Evaluation

Additional details have been added to the CEA Report and Appendix O – Soil, Waste and Landfill Gas Report to better describe all potentially affected landfill gas and other landfill monitoring and compliance infrastructure along the proposed Teston Road alignment at the Keele Valley Landfill site, the Vaughan

Waste Disposal site and the Disposal Services Landfill. The confirmed and potential KVL impacts, and recommended mitigation measures, associated with the recommended interim Teston Road design are shown below.

- Gas header and access chambers – to be located by field investigation and protected.
- Gas probes along north fence line (GMP1-86, GMP13-86, GMP14-86, GMP15-88, GMP16-88, GMP17-88, and GMP18-89) – generally to be protected, though a small number may need to be relocated.

Cross-sections at four key locations are provided in Attachment #1 which give an approximate indication of the proximity of the proposed Teston Road in relation to existing landfill infrastructure including landfill gas infrastructure on both the south and north sides. The locations of the four cross-sections are shown in plan view on the figures included as Attachment #2 and #3, the latter of which includes details based on available information on the location of landfill infrastructure.

C. Preferred Alternative Alignment 4E (Project Description)

We appreciate the City of Toronto's concern that the project description of the Preferred Alternative Alignment (4E) does not convey, to the City's satisfaction, the technical and regulatory challenges, which pose real risk to the project, as conveyed previously to the Region in the City's response comments on August 16, 2021 following the first open house. Significant updates have been made to the CEA report and appendices to address the City of Toronto's comments and concerns.

a) Legal Review of Land Boundaries and Covenants

York Region has undertaken a review of the land boundaries and covenants on lands within and adjacent to the Preferred Alignment Alternative (4E) for Teston Road within Section 2 of the corridor in the vicinity of the Keele Valley Landfill. The potential need for amendments to existing property boundaries, easement agreements and covenants the vicinity of the Vaughan Landfill and Keele Valley Landfill has been documented in the CEA report under Section 9.10 Property Requirements, Section 10.4.1 Property Requirements and Section 11.1 Future Consultation.

York Region provides the following responses to the *comments / questions* included in the City letter which references the legal plans and covenants that were included in your Attachment 2:

- *The western portion of Teston Road through proposed Section 2 was closed on October 29, 1981, under By-Law 256-81 (instrument R283130). Toronto requests the proponent to confirm the reason for the road closure is no longer valid.*

Response: The reason for the road closure is not given in the document that was attached to the City of Toronto's submission. We may assume that at the time there was no longer a need for public access to this section of the road allowance and there was a need to protect against public access to the operationally active Keele Valley Landfill and Vaughan Township Landfill. Circumstances have changed in that both of the above landfills are now closed and there is an identified need to extend Teston Road through this area.

- *Toronto requests the proponent to identify and confirm that Area 1 on Schedule 1 in the attached 1988 Joint Board Hearing for the Keele Valley Landfill is excluded from the proposed transportation corridor project.*

Response: York Region confirms that the Preferred Alternative Alignment Option 4E runs along the Original Road Allowance between Lots 25 and 26, Concession 3. Area 1 as indicated in Schedule I of the 1988 Joint Board Hearing for the Keele Valley Landfill falls within the road allowance between Lots 25 and 26, therefore, Area 1 is not excluded from the Preferred

Alignment Option 4E.

- *An Easement agreement was established in 1983 between the Town of Vaughan and Metropolitan Toronto for Areas identified in Schedule E and F of Instrument R320409 Clause 3(6) and 4(1). Toronto requests that the proponent confirm areas of Parts 6, 9, 51 and Parts 8 and 53 on Reference Plan 65R-5832 are excluded from the proposed transportation corridor project.*

Response: Parts 6, 8, 9, 51 and 53 shown on Reference Plan 65R-5832 all likely to be included, at least in part, in the required right-of-way for the Teston Road corridor project.

- *A transfer agreement between the City of Vaughan and Metropolitan Toronto for Part 9 and 10 of Reference Plan 65R-5832 was established in 1996 by Instrument R675034. The City of Toronto requests that the proponent confirm that these areas are excluded in the proposed transportation corridor project.*

Response: Parts 9 and 10 of Reference Plan 65R-5832 all both likely to be included, at least in part, in the required right-of-way for the Teston Road corridor project. Part 9 forms part of the Original Road Allowance between lots 25 & 26, Concession 3. Part 10 was acquired for road widening purposes. York Region confirms that Instrument No R471733 transferred Part 10, plan 65R-5832 to the City of Vaughan. Instrument No R675034 is the transfer of a permanent easement over Parts 9 and 10, 65R-5832, from Vaughan to Toronto for a gas balancing header pipe and similar devices. The easement over Part 9 was released by Toronto via Instrument No YR2041534 in 2013.

- *The City of Toronto requests that the Region verify the City of Toronto's understanding that the road allowance along the eastern portion of Alternative Alignment Option 4E, Section 2 is 66ft (20m; one chain) width and has been since first surveyed in 1820.*

Response: The Original Road Allowance between Lots 25 and 26, Concession 3 is 1 chain (66'/20m) in width. However, both the Region (Part 1, Plan 64R-4933) and City of Vaughan (Part 10, 65R-5832) acquired a 27' (8.23m) wide strip of property for road widening purposes. Bylaw R-371-76-31 added Part 1, 64R-4933 to the Regional Road System. Instrument No R471733 states that Part 10, Plan 65R-5832 was transferred from the City of Toronto to the City of Vaughan for road widening.

At this time, York Region anticipates that changes to at least some of the above agreements will need to be considered and negotiated between the affected parties in order to accommodate both the proposed new Teston Road corridor within Section 2 of the project and continued KVL access. York Region commits to ensuring that the City of Toronto's requirements for landfill and infrastructure access for monitoring compliance of the Keele Valley Landfill is appropriately accommodated and asks that the City of Toronto commit to working with the City of Vaughan and the Region to help mutually resolve these requirements.

b) Assessment of Regulatory Framework Governing Keele Valley Landfill Site

York Region acknowledges the City of Toronto's concerns regarding the potential implications to the regulatory framework governing the Keele Valley Landfill Site and understands that the cumulative amendments to the ECA to date for the Keele Valley Landfill are complex and that minor administrative amendments to the ECA, which have not involved landfill infrastructure or changes to the approved monitoring program have recently taken up to 2 years to obtain approval through MECP.

York Region anticipates that amendments to the Keele Valley Landfill site Environmental Compliance Approval (ECA) will be required due to impacts to infrastructure, property, access and monitoring program requirements that are now fully detailed in the revised CEA report including Appendix L – Hydrogeology Report and Appendix O – Soil, Waste and Landfill Gas Report. These reports now itemize, in detail

appropriate to an EA, the potential impacts and the required mitigations, which we understand is important groundwork for any future ECA amendments.

York Region commits to ensuring that the City of Toronto's requirements for landfill and infrastructure access for monitoring compliance of the Keele Valley Landfill are appropriately accommodated and asks that the City of Toronto agree to pursue, with York Region support, any required ECA amendments through MECP in a reasonable and timely manner given that the Region has advanced the construction of Teston Road between Keele Street and Dufferin Street into its 10-year Capital Plan. We understand that there is no guarantee of approval of the required ECA amendments but believe that these can reasonably be secured through the affected parties working together.

York Region acknowledges that MECP concurrence with any changes to landfill infrastructure will be required and has documented this requirement in the CEA Report.

c) Continued Secure Operation of Keele Valley Landfill Control Systems

York Region acknowledges that it is of great importance to the City of Toronto that continued operation of the Keele Valley Landfill control systems be maintained during the construction and post-construction (operation) phases of the Teston Road project to ensure compliance with the ECAs for the Keele Valley Landfill Site; that landfill infrastructure be securely protected; and, that ample maintenance access be provided if repair or replacement of the infrastructure is required.

Some impacts to existing landfill infrastructure have been identified, even under the narrower recommended interim design which are itemized in the CEA. The key impacts to landfill gas infrastructure are itemized above, while the key impacts to groundwater and leachate infrastructure are:

- North leachate cleanout chambers - to be located by field investigation and protected.
- Groundwater monitoring wells particularly those on the north KVL fence line, and northwest and northeast of the waste (including 3/92, 8/83, 7/83, 9/83, 16/88, 17/88, 4/91 and 13/84) - generally are to be protected, though a small number may need to be relocated.
- Leachate collection main – to be located by field investigation and protected.

See Attachments #1, #2 and #3.

When it comes to relocating monitoring infrastructure, York Region acknowledges that “relocation is not necessarily equivalency (anisotropy)” and that “relocation has considerable technical requirements” (see presentation by Golder, June 17, 2020) and has considered these concerns carefully in making recommendations in Appendix L – Hydrogeology Report and Appendix O – Soil, Waste and Landfill Gas Report.

All existing landfill accesses will be maintained with some minor modifications to accommodate the Teston Road widening / extension. Access to all landfill monitoring and control infrastructure will be maintained, although a minor (65 m) relocation to the west of the northeast Keele Valley Landfill access is proposed to avoid impacts to the northern landfill service road. The existing Keele Valley Landfill fence line along the north edge of the landfill will, for the most part, be maintained in its current location under the recommended interim Teston Road design although a section along the northwest edge may need to be shifted slightly to the south. New fencing will be provided along the north edge of the right-of-way to ensure landfill infrastructure in this area is securely protected. Section 9.1.3 of CEA Report has been modified to include further consideration at detail design of retaining walls, alignment adjustments and cross-section optimization, and, the potential deferral of the proposed westbound left-turn from Teston Road to Rodinea Road to the ultimate stage of the project to reduce property acquisition and easements in the vicinity of the existing landfills.

The recommendations of the CEA report include field investigations to locate and document the KVL gas header and access chambers and the northern leachate cleanout chambers, and it would be beneficial to properly locate and assess the condition of the potentially impacted gas probes and groundwater monitoring wells. These are considered to be reasonable next steps to be carried out, as the project

proceeds through various stages of planning and design development. The results of such investigations, as well as input received through stakeholder engagement may affect the project's final design (including its alignment, cross-section, environmental mitigation measures, phasing), associated approval processes (and timelines), and project costs, and therefore the project's net environmental effects, affordability and feasibility. At the time of the writing of this report the key study recommendations (i.e. to proceed with the Teston Road interim design subject to EA approval) remain unchanged.

d) Deferring Delineation of Waste to Detail Design May Impact Evaluation of the Preferred Alternative

York Region acknowledges the potential for landfill waste to be present in the proposed Teston interim / ultimate right-of-way and has ensured that this is clearly documented in the CEA Report. While landfill waste was not encountered in any of the boreholes that were drilled as part of the subsurface investigation conducted as part of the Teston Road Area CEA, we understand from mapping provided by the City of Toronto, that the KVL site approximate approved limit of waste in part follows the northern property line of the KVL site, and, also that the approximate Vaughan Landfill site approved limit of waste in part follows the southern property line of the Vaughan Landfill site.

Based on the above mapping, augmented by detailed review of the landfill gas monitoring results, the recommended interim design for the Teston Road extension roadway and northern multi-use pathway (and the right-of-way) may encounter landfill waste associated with the VL but does not appear likely to encounter landfill waste associated with the KVL. See Attachments #1, #2 and #3.

A commitment is included in the CEA Report that York Region will undertake additional field investigations at the detail design stage of the project to determine if landfill waste associated with any of the three adjacent landfills is present within the proposed interim Teston Road right-of-way and grading limits where these extend beyond the proposed right-of-way, and to delineate the limits of landfill waste in these areas (as is reasonably practical). Based on the above investigations, York Region will work with the appropriate landfill owners / operators to confirm what, if any, actions and / or additional mitigation measures will need to be included in the project and at what cost. York Region has included contingency allowances in the project budget which should be adequate to address the risk of encountering waste within the proposed right-of-way.

e) Reasonable Potential for Landfill Gas to be Present within the Teston Road Right-of-Way

York Region acknowledges the potential for landfill gas to be present in the transportation corridor right-of-way and this may result in certain health and safety hazards, both during the construction period and after the road corridor has been placed into service. Clear statements to this effect are included in the Appendix O – Soil, Waste and Landfill Gas report, which are carried through into the CEA Report. Given the long history of landfill gas monitoring on both sides of the road allowance, we have reconsidered and removed our recommendation for additional landfill gas investigations during detailed design. We have, instead, acknowledged that landfill gas is likely to be present beneath the roadway, and have proposed mitigation measures for short term and long-term protection of all people.

The recommended interim design for the Teston Road extension roadway, northern multi-use pathway, grading designs (and the right-of-way) will have impacts to the VL gas collection system. These impacts and proposed mitigation measures are documented in the CEA Report. See Attachments #1 and #3.

f) Request for Scaled Drawings (Plan View and Cross Section)

Draft interim and ultimate preliminary design drawings showing the proposed Teston Road design, grading and right-of-way limits in relation to the current City of Toronto property limits have previously been provided to the City of Toronto for review and comment. The interim designs have since been updated to refine the grading and retaining wall designs adjacent to the KVL to minimize encroachment and to avoid any encroachment beyond the KVL northern fence line, except potentially for a short section at the northwest end of the KVL property, and at the west and east KVL accesses, the profiles of which

will need to be adjusted along with the minor relocation of the east KVL access a short distance to the west – all of which is subject to further review / refinement at detail design. Opportunities may also exist at detail design to optimize the Teston Road's alignment and profile. (See Attachments #4 and #5)

At the City of Toronto's request, we have prepared scaled roadway cross-sections in the vicinity of the KVL to better demonstrate the recommended interim Teston Road project's boundaries in this area. (See Attachment #1) The location, and in particular, depths of the landfill infrastructure shown on the cross sections is subject to some uncertainty, but this does not take away from our conclusion that the proposed Teston Road and the existing landfills are not incompatible land uses, and that any impacts can be mitigated.

D. Effects Assessment, Mitigation and Commitment to Future Work

a) Assessment of Regulatory Framework Governing Keele Valley Landfill Site

As noted above, York Region acknowledges the City of Toronto's concerns regarding the potential implications to the regulatory framework governing the KVL site and understands that the cumulative amendments to the ECA to date for the KVL are complex.

York Region anticipates that amendments to the KVL site Environmental Compliance Approval (ECA) will be required due to some (mostly) minor impacts to infrastructure, property, access and monitoring program requirements.

York Region commits to ensuring that the City of Toronto's requirements for landfill and infrastructure access for monitoring compliance of the KVL are appropriately accommodated and asks that the City of Toronto agree to pursue, with York Region support, any required ECA amendments through MECP in a reasonable and timely manner. We understand that there is no guarantee of approval of the required ECA amendments but believe that these can be made through a collaborative effort from the affected parties.

York Region acknowledges that MECP concurrence with any changes to landfill infrastructure will be required and has documented this requirement as a commitment in the IEA Report.

b) Teston Road Purge Well System Management / Environmental Compliance Monitoring of Vaughan Landfill Main Plume

The Teston Road Purge Well System (TPWS) is operated by the City of Toronto and consists of thirteen (13) purge wells in addition to approximately 21 observation wells. York Region has carried out a conflict check for the proposed road design with the purge wells and no direct conflicts were identified. The approximate locations of these wells are shown on Figures 7, 7b and 7c of the Hydrogeology Report. Although no direct conflicts were identified, the wells may be impacted by ground disturbance associated with the construction and excavation activities. This potential impact has been documented in the CEA Report along with a commitment to ensure it is mitigated.

A leachate collection pipe which transmits groundwater impacted by leachate from the TPWS runs beneath the proposed Teston Road in a north-south orientation between 21 Rodinea Road and KVL as shown on Figure 7a (see Attachment #3) and is considered a direct conflict with the proposed road design. This potential impact has been documented in the CEA Report along with a commitment to ensure it is mitigated.

York Region has carried out a conflict check for the proposed Teston Road design with the KVL observation wells. The approximate locations of these wells are shown in Figures 7 and 7a-c of the Hydrogeology Report (and in Attachment #3). Some observation wells, including 3/92, 16/88, 17/88, 4/91 and 13/84, are within 5 metres of the proposed edge of pavement or within the approximate grading limits and may need to be relocated although most of these can remain in their current location as long as they

are protected during and after construction.

York Region has carried out a conflict check for the proposed road design with the leachate maintenance access chambers at the north side of the KVL. Based on the available information, the most likely locations for these are shown on Figure 7b and 7c of the Hydrogeology Report (see Attachment #3). At least one of these two leachate maintenance access chambers is within metres of the proposed edge of pavement. So long as these are protected during construction and so long as the interim Teston Road design does not significantly change the location of the northern fence line for the KVL, these leachate maintenance access structures are not likely to be in conflict.

York Region acknowledges that some modifications to the current access to the Teston Road Purge Well System Management infrastructure and therefore some modifications to the Environmental Compliance Monitoring Program of the Vaughan Landfill Main Plume will be required to accommodate the proposed interim Teston Road design.

It is important to note that all existing landfill accesses will be maintained with some minor modifications to accommodate the Teston Road widening / extension. Access to all landfill monitoring and control infrastructure will be maintained. The existing KVL fence line along the north edge of the landfill will, except potentially for a short section at the northwest end of the KVL property, be maintained in its current location under the recommended interim Teston Road design. Therefore, there will be little to no impact to the existing east-west service road that follows the north edge of the Keele Valley Landfill.

York Region will work with the landfill owners / operators to ensure that sufficient monitoring, operating, maintenance access is provided to the landfill infrastructure in the vicinity of the transportation corridor. At this time, the Region does not consider access to monitoring compliance infrastructure do be a major issue for the project, although access coordination will be needed during construction.

c) Ability to Maintain Compliance with Approved Keele Valley Landfill Site ECA

We acknowledge the City of Toronto's concerns regarding its ability to maintain compliance with the approved KVL Environmental Compliance Approval (ECA). We trust that the responses provided herein and in the revised CEA Report have addressed most of the City's concerns.

As noted above York Region anticipates that amendments to the KVL site Environmental Compliance Approval (ECA) will be required due to some (mostly) minor impacts to infrastructure, property, access and monitoring program requirements. York Region commits to ensuring that the City of Toronto's requirements for landfill and infrastructure access for monitoring compliance of the KVL are appropriately accommodated and asks that the City of Toronto agree to pursue, with York Region support, any required ECA amendments through MECP in a reasonable and timely manner.

CLOSURE

We look forward to continuing to engage with the City of Toronto on this project as it proceeds through the EA process and to working to ensure that any potential impacts to the Keele Valley Landfill are avoided or, if necessary, appropriately mitigated and addressed.

We will also continue to share details of the design and any required mitigations as this work proceeds.

We would be please to meet with the City of Toronto to discuss your comments and concerns and the Region's responses prior to submission of the revised EA report for MECP review and approval.

Thank you once again for your input to this important study.

Regards,



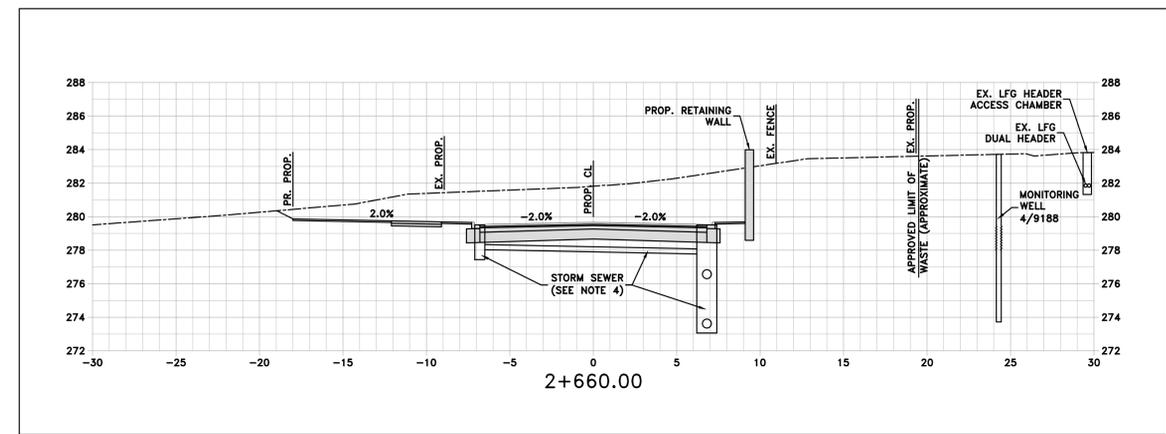
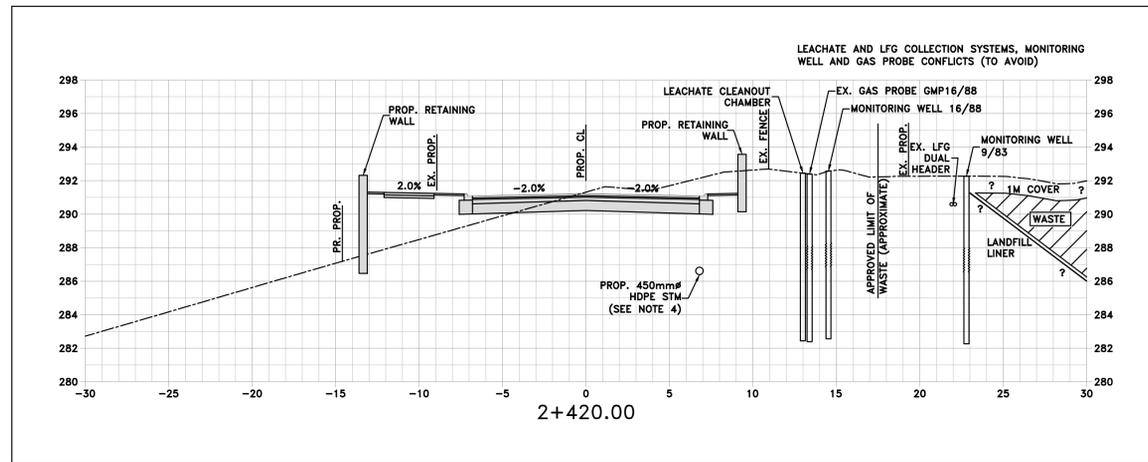
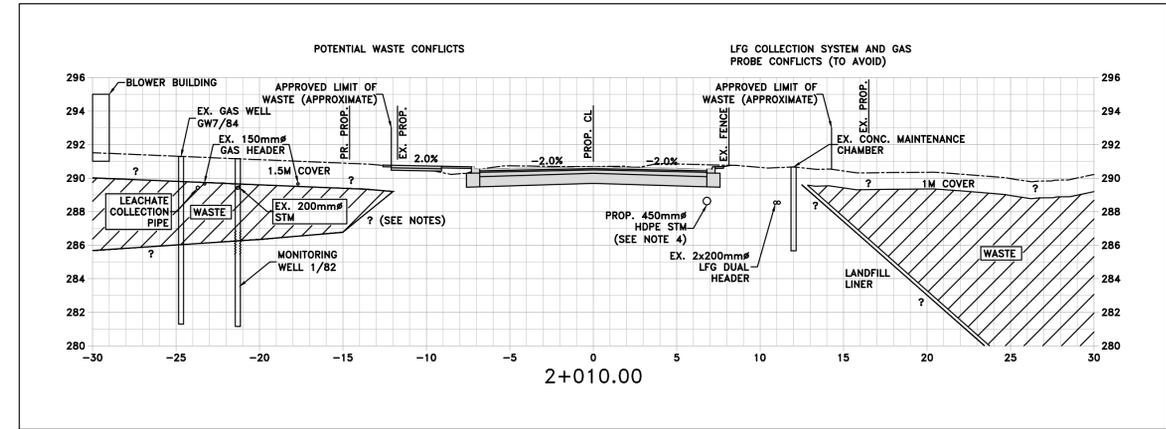
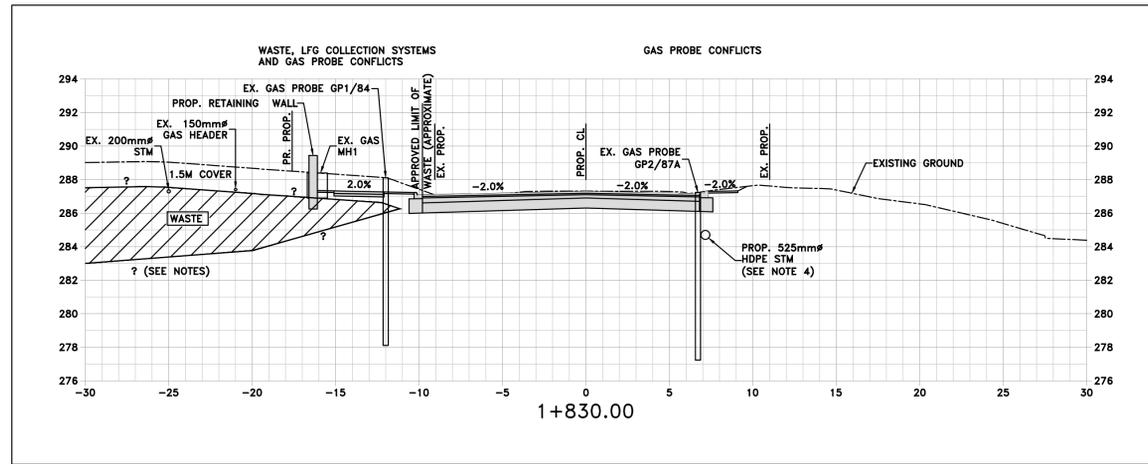
Billy Cheung, M.A.Sc., P.Eng., Project Manager
Capital Delivery - Transportation, Capital Infrastructure Services, Public Works
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Neil Brown, Director (Acting), Transfer Stations & Landfill Operations, City of Toronto;
Neil.Brown@toronto.ca
Andrea Brown, District Engineer, Ministry of Environment, Conservation and Parks;
Andrea.J.Brown@ontario.ca
Kate Dykman, Manager, Solid Waste, City of Vaughan; Kate.Dykman@vaughan.ca
Tracy Meldrum, Lead, Senior Hydrogeologist, WSP; Tracy.Meldrum@wsp.com

Attachment #1 – Typical Cross-Sections

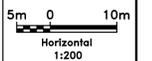
DRAFT



NOTES:

1. ALL LANDFILL INFRASTRUCTURE SUCH AS LFG COLLECTION SYSTEMS, GAS PROBES, GROUNDWATER MONITORING WELLS, WASTE, LINERS, AND COVER ARE SCHEMATIC AND FOR ILLUSTRATIVE PURPOSES ONLY.
2. WASTE COVER THICKNESSES ARE FROM VARIOUS REPORTS.
3. WASTE LIMITS ARE ANNOTATED WITH "?" AND EXTRAPOLATED FROM VARIOUS MAP, BOREHOLE AND ANACDOTAL EVIDENCE. WASTE LIMITS ARE APPROXIMATE AND FOR ILLUSTRATIVE PURPOSES ONLY.
4. STORM SEWER TO BE DESIGNED SO THAT IT DOES NOT BECOME PREFERENTIAL PATHWAYS FOR THE MIGRATION ON LANDFILL GAS, AND IT MUST BE PROTECTED FROM THE INGRESS OF LANDFILL GAS.

SCALE



NOTES:
 THE LOCATION OF UTILITIES IS APPROXIMATE ONLY. CONSULT THE RESPECTIVE MUNICIPAL AUTHORITIES AND UTILITY COMPANIES TO DETERMINE THE EXACT LOCATION OF THEIR UTILITIES. THE CONTRACTOR SHALL VERIFY THE LOCATION OF UTILITIES AND SHALL ADEQUATELY PROTECT AND SUPPORT THEM DURING CONSTRUCTION.



No.	DATE	REVISIONS	BY

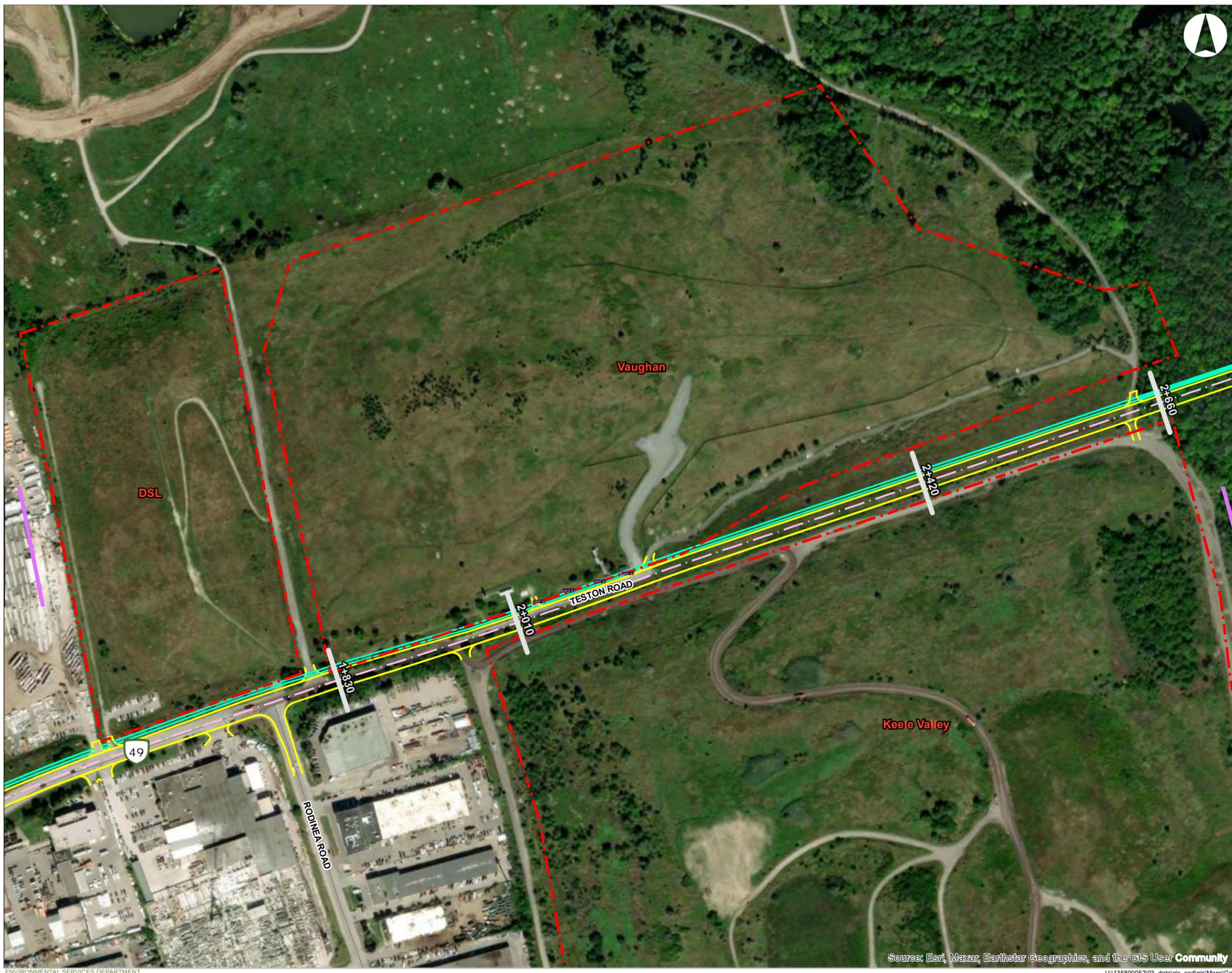


DESIGN
MPB
DRAWN
YG
CHECKED
MPB

TESTON ROAD (Y.R. 49) RECONSTRUCTION
 FROM KEELE STREET (Y.R.6)
 TO BATHURST STREET (Y.R.38)
 CROSS SECTIONS, INTERIM
 1+830, 2+010, 2+420, 2+660
 (AT KEELE VALLEY LANDFILL AND VAUGHAN LANDFILL)

DWG. NO.
17
CONT. NO.
SHEET NO.
CS-1

Attachment #2 – Landfill Limits of Waste and 30 m Buffers



LEGEND

- - - Approved Limit of Waste (Approximate)
- Approved Limit of Waste (Approximate) (30 m Buffer)
- Cross Section

Design Features

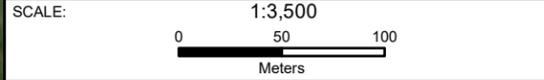
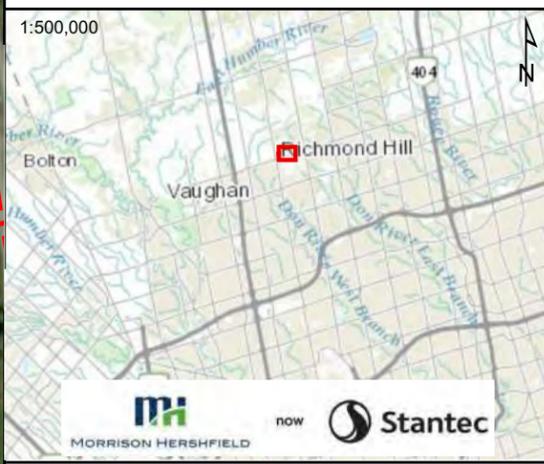
- Edge of Pavement
- Proposed Multi-Use Pathway
- Proposed C/L

Transportation Network

- Local Roads

NOTES:

- The area shown is within the jurisdiction of the Ministry of Natural Resources (MNR) Aurora Midhurst Owen Sound District and the Toronto and Region Conservation Authority Area



TITLE:

Landfill Approved Limit of Waste and 30 m Buffer

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Attachment #3 – Landfill Infrastructure



LEGEND

- - - Approved Limit of Waste (Approximate)
- - - KVLS Primary Buffer Lands (Approximate Location)
- - - Landfill (including KVLS Secondary) Buffer Lands (Approximate Location)
- Surrounding Building
- Cross Section
- X North Fence of KVL (shown in white on map)
- Storm Sewer (Approximate Location)

Gas Extraction Wells (Approximate Location)

- Vaughan Landfill
- Gas Manhole

Gas Infrastructure (Approximate Location)

- ▲ VL Onsite Gas Probe (1984, 1987 B Series, 1997)
- ▲ VL Offsite Gas Probe (1986, 1987 A&B Series)
- ▲ KVL Gas Probe
- ▲ Gas Header/Maintenance Access (Golder, 2018)
- Gas Collection Header (MMM, 2016)
- Disposal Services Landfill Monitoring Well/ Gas Probe (Approximate Location)

Design Features

- Edge of Pavement
- Proposed Multi-Use Pathway
- Proposed C/L
- Gas Header

Transportation Network

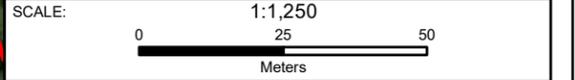
- Local Roads

NOTES:

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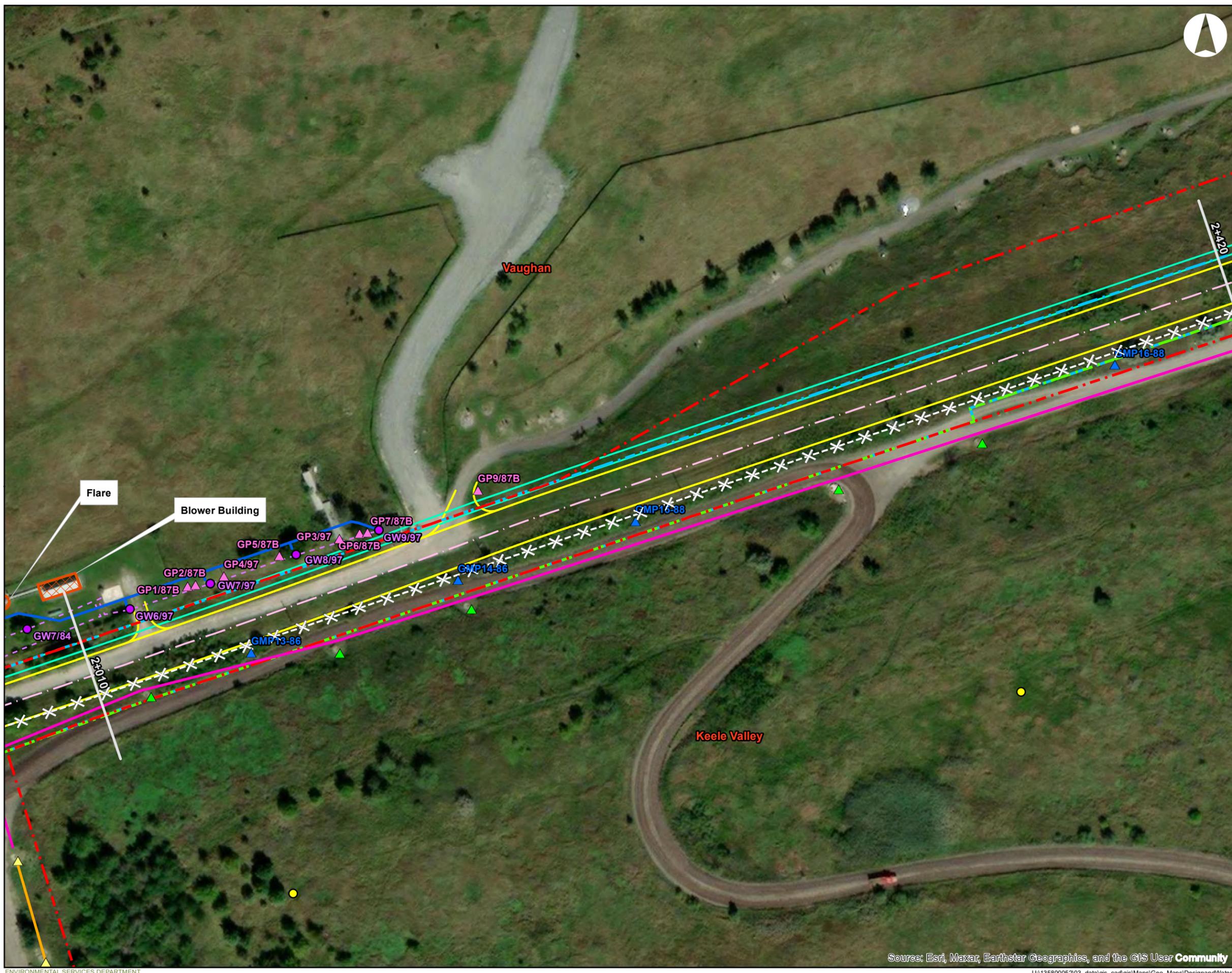
Coordinate System: NAD 1983 UTM Zone 17N
 Sources: MNR, Golder, Dixon Hydrogeology
 Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, Swisstopo



TITLE:
Landfill Infrastructure, Gas Focus, DSL, KVL and VL

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

DATE: July 2025 **Figure 3a**



LEGEND

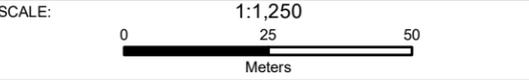
- - - Approved Limit of Waste (Approximate)
- - - KVLs Primary Buffer Lands (Approximate Location)
- - - Landfill (including KVLs Secondary) Buffer Lands (Approximate Location)
- Surrounding Building
- Cross Section
- X - - - North Fence of KVL (shown in white on map)
- Storm Sewer (Approximate Location)
- Gas Extraction Wells (Approximate Location)**
- Keele Valley Landfill
- Vaughan Landfill
- Gas Infrastructure (Approximate Location)**
- ▲ VL Onsite Gas Probe (1984, 1987 B Series, 1997)
- ▲ Concrete Maintenance Chamber, Purpose Unknown
- ▲ KVL Gas Probe
- ▲ Gas Header/Maintenance Access (Golder, 2018)
- Gas Collection Header (MMM, 2016)
- Design Features**
- Edge of Pavement
- Proposed Multi-Use Pathway
- Proposed C/L
- Gas Header

NOTES:

- The area shown is within the jurisdiction of the Ministry of Natural Resources (MNR) Aurora Midhurst Owen Sound District and the Toronto and Region Conservation Authority Area



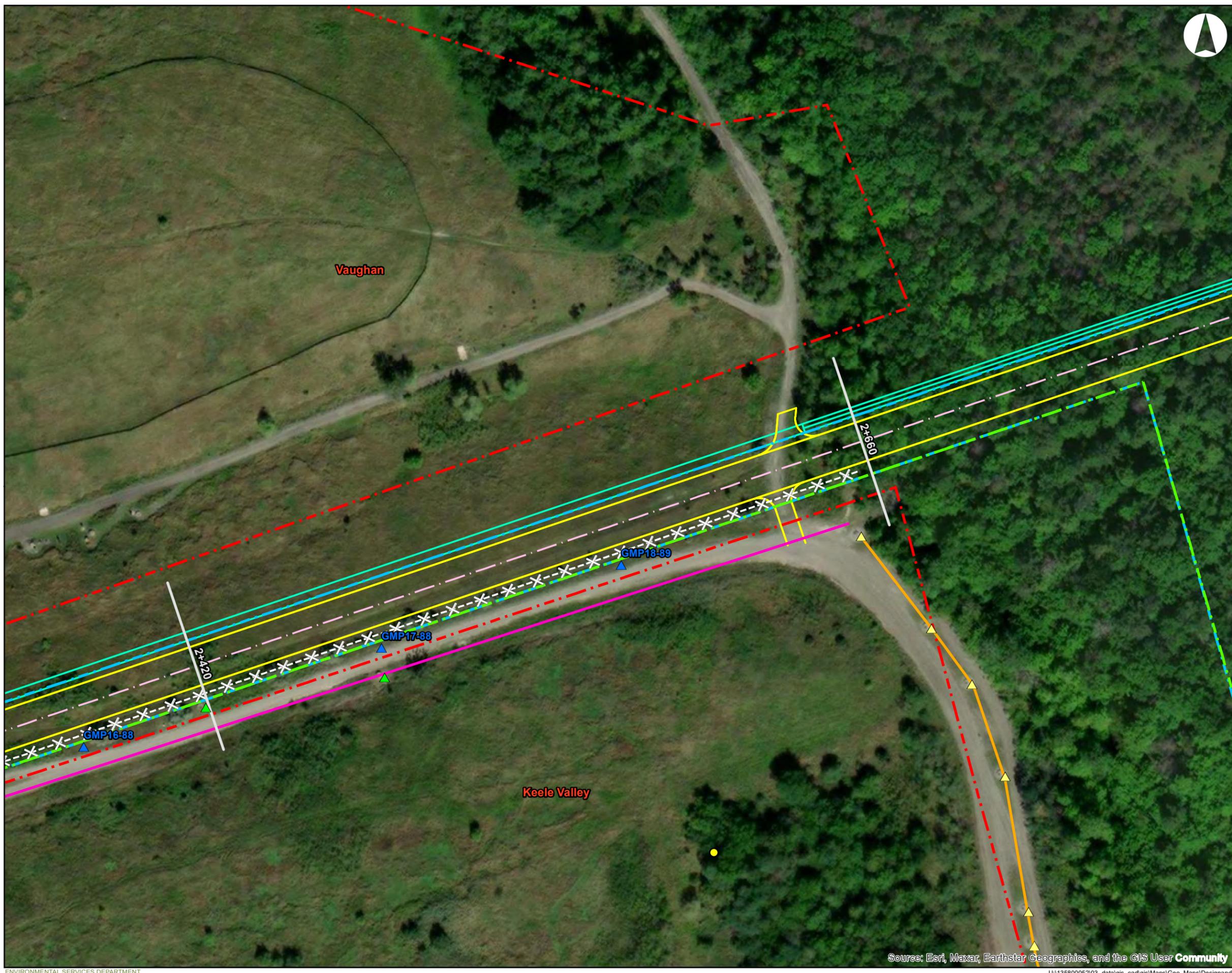
Coordinate System: NAD 1983 UTM Zone 17N
 Sources: MNR, Golder, Dixon Hydrogeology, Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, Swire, etc.



TITLE:
Landfill Infrastructure, Gas Focus, KVL and VL

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

DATE: **July 2025** **Figure 3b**



LEGEND

- - - Approved Limit of Waste (Approximate)
- - - KVL Primary Buffer Lands (Approximate Location)
- - - Landfill (including KVL Secondary) Buffer Lands (Approximate Location)
- Cross Section
- - - x North Fence of KVL (shown in white on map)

Gas Extraction Wells (Approximate Location)

- Keele Valley Landfill

Gas Infrastructure (Approximate Location)

- ▲ Gas Header/Maintenance Access (Golder, 2018)
- Gas Collection Header (MMM, 2016)
- ▲ Concrete Maintenance Chamber, Purpose Unknown
- ▲ KVL Gas Probe

Design Features

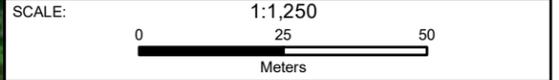
- Edge of Pavement
- Proposed Multi-Use Pathway
- - - Proposed C/L

NOTES:

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Coordinate System: NAD 1983 UTM Zone 17N
 Sources: MNR, Golder, Dixon Hydrogeology, Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, Stantec



TITLE:
Landfill Infrastructure, Gas Focus, KVL and VL

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

DATE: July 2025 **Figure 3c**

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



LEGEND

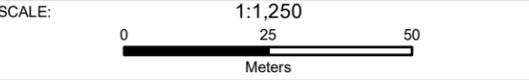
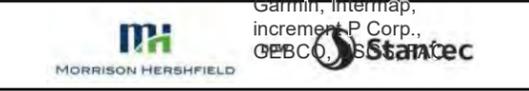
- Monitoring Wells (Other) (Approximate Location)
 - Keele Valley Landfill Observation Wells (Approximate Location)
 - Disposal Services Landfill Monitoring Well/ Gas Probe (Approximate Location)
 - Leachate Maintenance Hole or Cleanout (Approximate Location)
 - Cross Section
 - Leachate Collection System Piping (Approximate Location)
 - X— North Fence of KVL (shown in white on map)
 - Approved Limit of Waste (Approximate)
 - KVLs Primary Buffer Lands (Approximate Location)
 - Landfill (including KVLs Secondary) Buffer Lands (Approximate Location)
 - Subsurface Leachate Storage Tank (Approximate Location)
- Design Features**
- Edge of Pavement
 - Proposed Multi-Use Pathway
 - Proposed C/L
- Transportation Network**
- Local Roads

NOTES:

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Coordinate System: NAD 1983 UTM Zone 17N
Sources: MNR, Golder, Dixon Hydrogeology

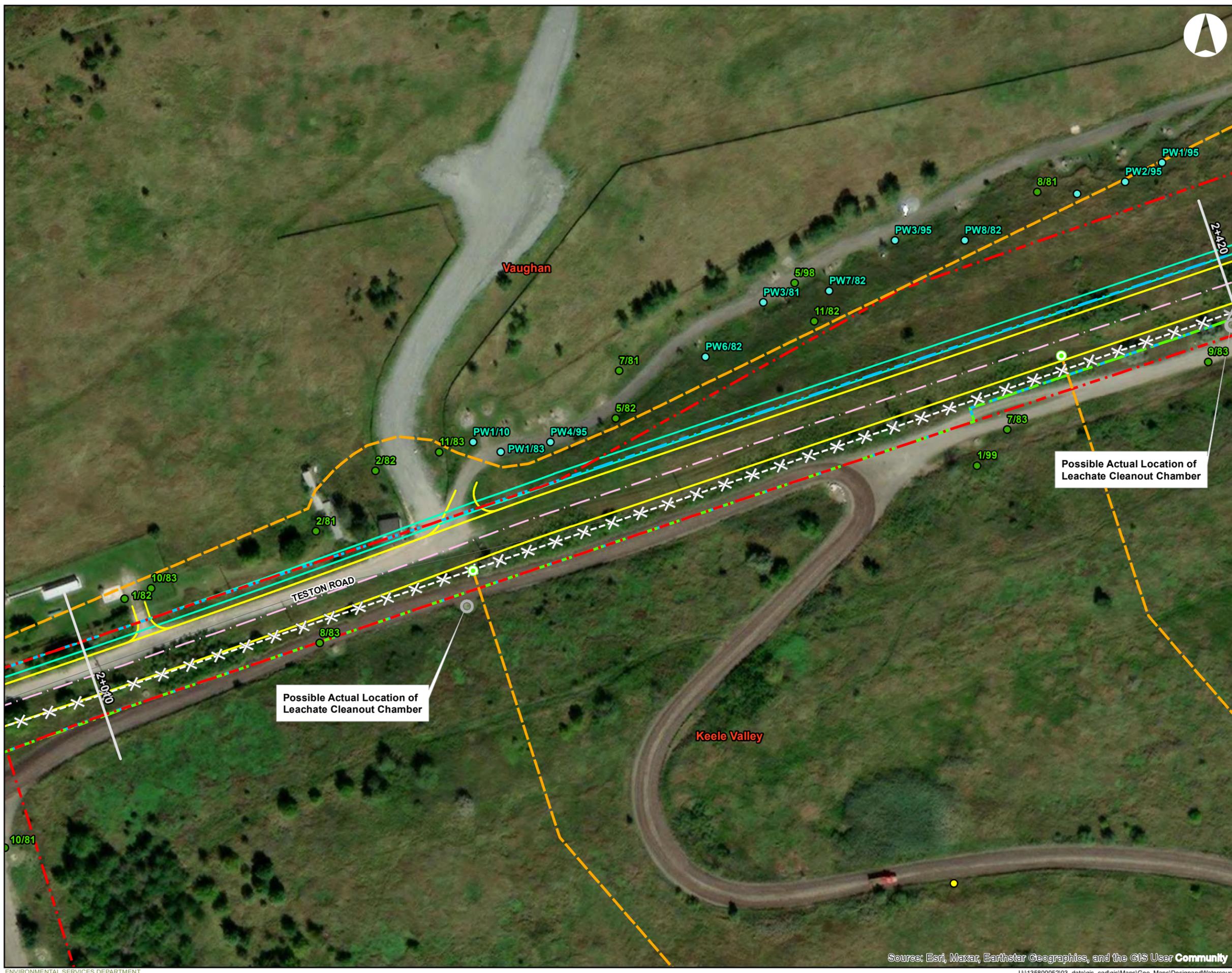


TITLE:
Landfill Infrastructure, Groundwater and Leachate Focus, DSL

PROJECT NO.: 190261800
Teston Road, Vaughan Ontario
(From Keele Street to Bathurst Street)

DATE: **July 2025** **Figure 7a**

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



LEGEND

- Purge Well (Approximate Location)
- Vibrating Wire Piezometer Above-Liner (Approximate Location)
- Keele Valley Landfill Observation Wells (Approximate Location)
- Leachate Maintenance Hole or Cleanout (Approximate Location)
- Cross Section
- Leachate Collection System Piping (Approximate Location)
- ✕ — North Fence of KVL (shown in white on map)
- Approved Limit of Waste (Approximate)
- KVLS Primary Buffer Lands (Approximate Location)
- Landfill (including KVLS Secondary) Buffer Lands (Approximate Location)

Design Features

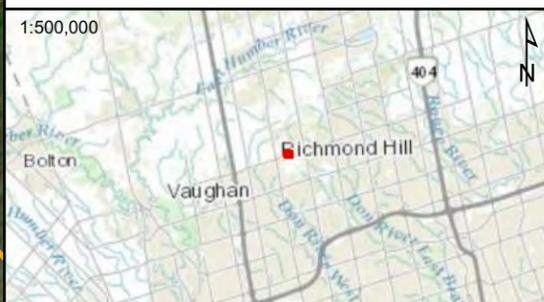
- Edge of Pavement
- Proposed Multi-Use Pathway
- Proposed C/L

Transportation Network

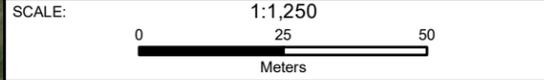
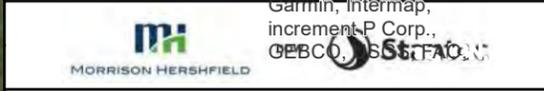
- Local Roads

NOTES:

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Coordinate System: NAD 1983 UTM Zone 17N
 Sources: MNR, Golder, Dixon Hydrogeology, Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, Swisstopo

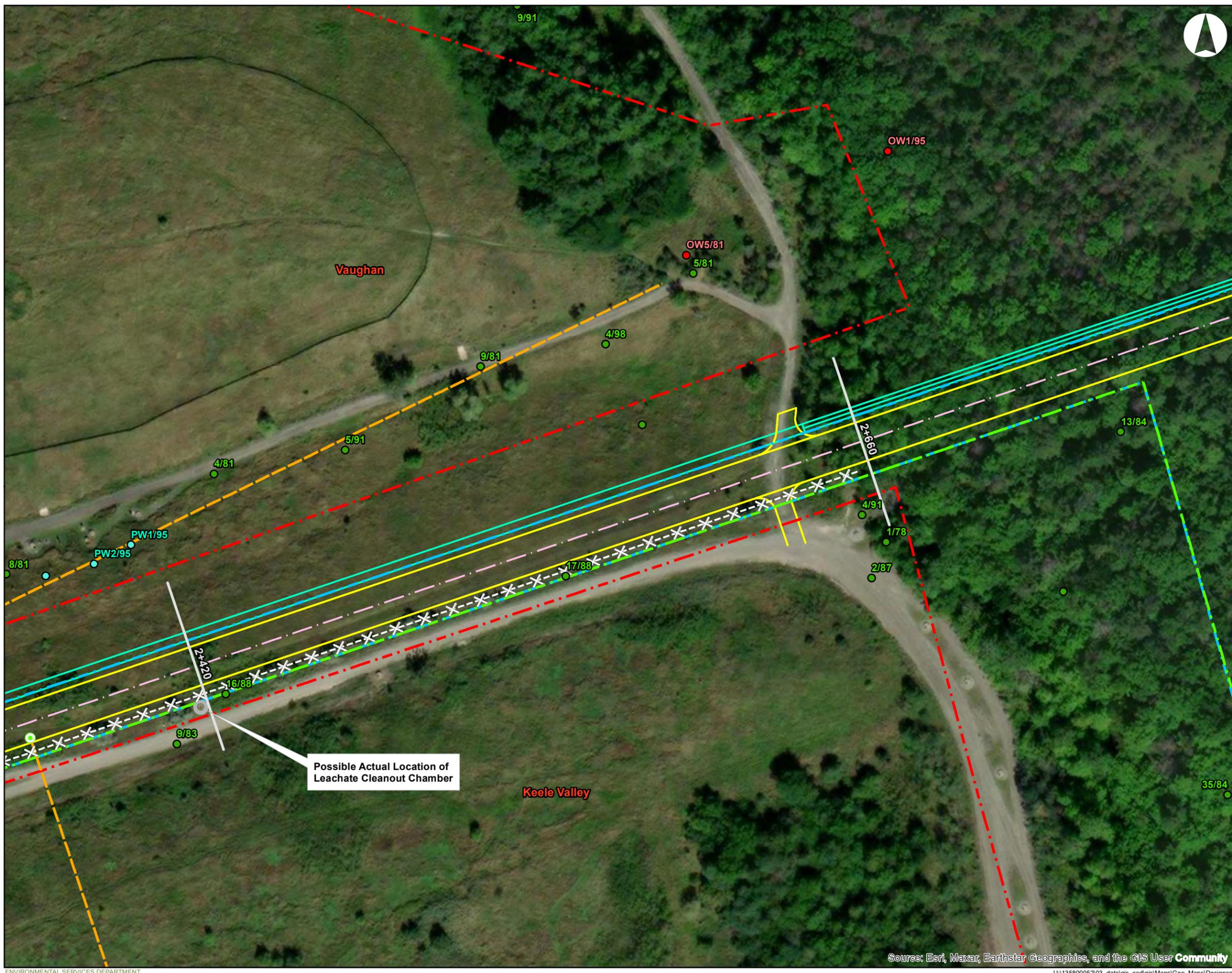


TITLE:
Landfill Infrastructure, Groundwater and Leachate Focus, KVL and VL

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

DATE: July 2025 **Figure 7b**

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



LEGEND

- Purge Well (Approximate Location)
- Keele Valley Landfill Observation Wells (Approximate Location)
- Vaughan Landfill Groundwater Monitoring Wells (Approximate Location)
- Leachate Maintenance Hole or Cleanout (Approximate Location)
- Cross Section
- - - Leachate Collection System Piping (Approximate Location)
- X - - X North Fence of KVL (shown in white on map)
- . - . Approved Limit of Waste (Approximate)
- - - KVLS Primary Buffer Lands (Approximate Location)
- - - Landfill (including KVLS Secondary) Buffer Lands (Approximate Location)

Design Features

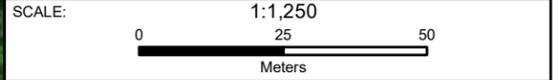
- Edge of Pavement
- Proposed Multi-Use Pathway
- - - Proposed C/L

NOTES:

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Coordinate System: NAD 1983 UTM Zone 17N
 Sources: MNR, Golder, Dixon Hydrogeology, Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, Stantec



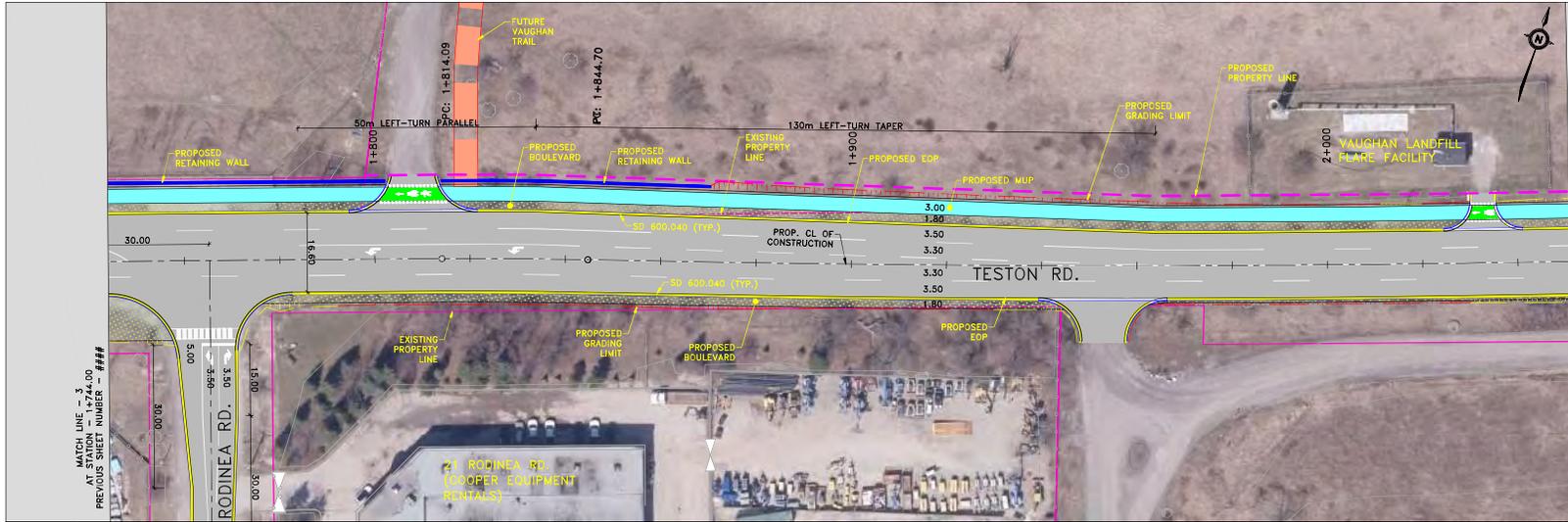
TITLE:
Landfill Infrastructure, Groundwater and Leachate Focus, KVL and VL

PROJECT NO.: 190261800
 Teston Road, Vaughan Ontario
 (From Keele Street to Bathurst Street)

DATE: **July 2025** **Figure 7c**

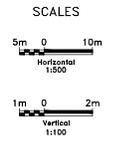
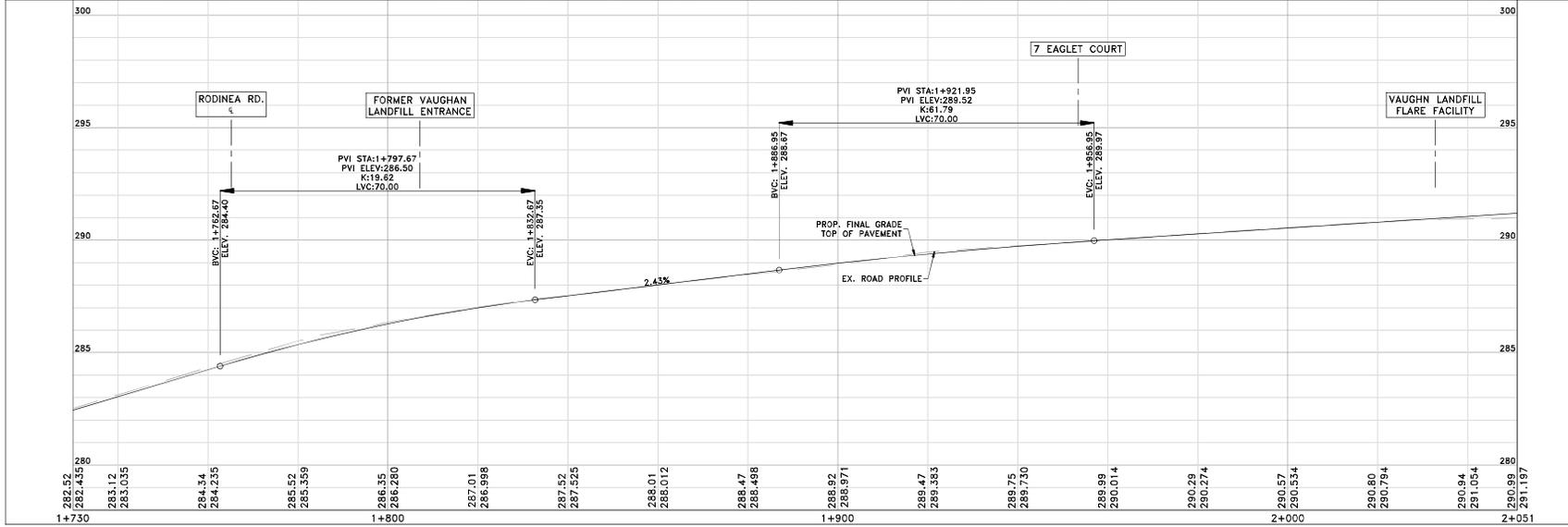
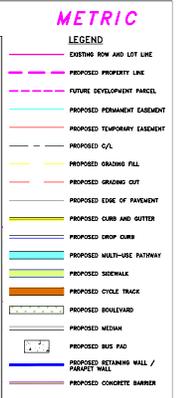
Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Attachment #4 – Updated Interim Design Plans



MATCH LINE - 3
AT STATION 1+724.00
PREC. SHEET NUMBER: ###

MATCH LINE - 4
AT STATION 2+051.00
NEXT SHEET NUMBER: ###



NOTES:
THE LOCATION OF UTILITIES IS APPROXIMATE ONLY. CONSULT THE RESPECTIVE MUNICIPAL AUTHORITIES AND UTILITY COMPANIES TO DETERMINE THE EXACT LOCATION OF THEIR UTILITIES. THE CONTRACTOR SHALL VERIFY THE LOCATION OF UTILITIES AND SHALL ADEQUATELY PROTECT AND SUPPORT THEM DURING CONSTRUCTION.



No.	DATE	REVISIONS	BY

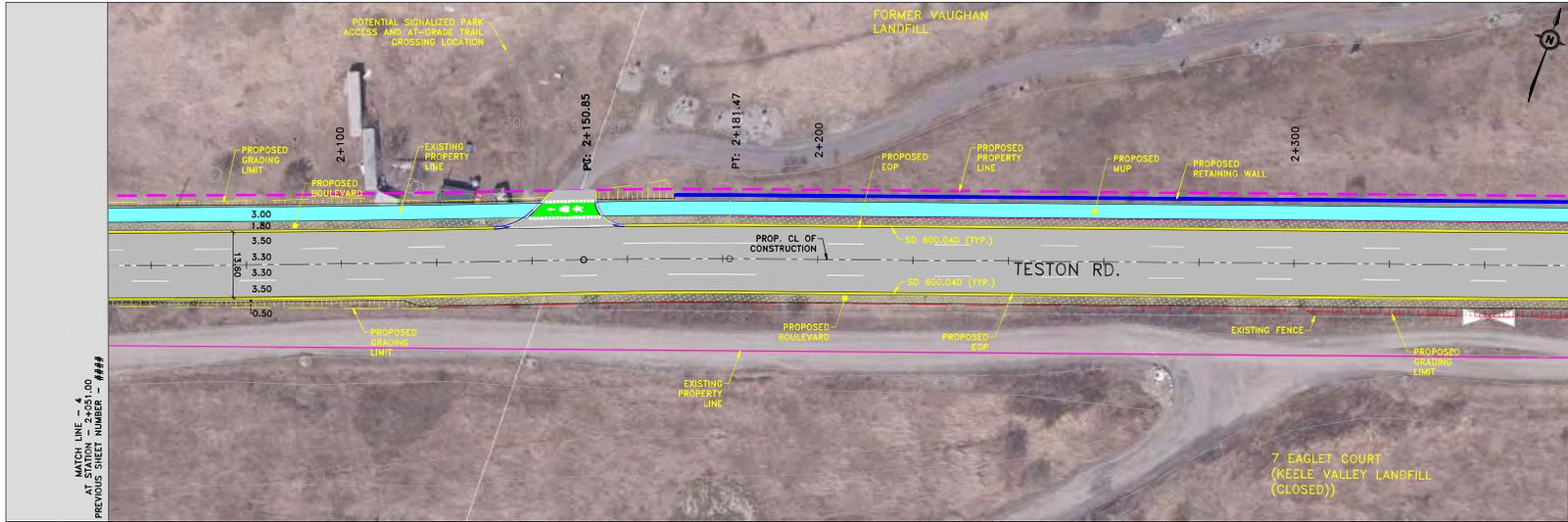


Public Works
Transportation

DESIGN MPB
DRAWN YG
CHECKED MPB

TESTON ROAD (Y.R. 49) RECONSTRUCTION
FROM KEELE STREET (Y.R.6)
TO BATHURST STREET (Y.R.38)
PRELIMINARY DESIGN
1+744 TO 2+051

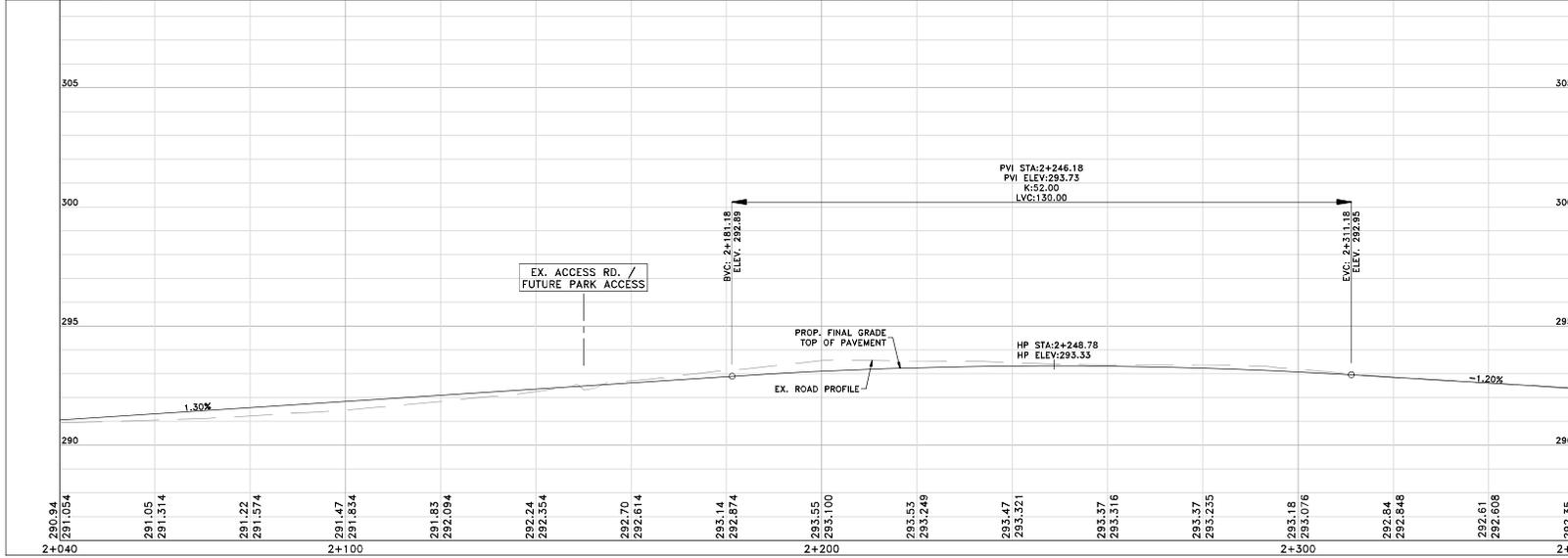
DWG. NO. 5
CONT. NO.
SHEET NO. 4



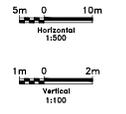
MATCH LINE - 5
AT STATION - 2+358.00
NEXT SHEET NUMBER: ###

MATCH LINE - 4
AT STATION NUMBER 1.00
PREVIOUS SHEET NUMBER: ###

- METRIC**
- LEGEND**
- EXISTING ROW AND LOT LINE
 - PROPOSED PROPERTY LINE
 - FUTURE DEVELOPMENT PARCEL
 - PROPOSED PERMANENT EASEMENT
 - PROPOSED TEMPORARY EASEMENT
 - PROPOSED G/L
 - PROPOSED GRADING FILL
 - PROPOSED GRADING CUT
 - PROPOSED EDGE OF PAVEMENT
 - PROPOSED CURB AND GUTTER
 - PROPOSED DROP CURB
 - PROPOSED MULTI-USE PATHWAY
 - PROPOSED SIDEWALK
 - PROPOSED CYCLE TRACE
 - PROPOSED BOULEVARD
 - PROPOSED MEDIAN
 - PROPOSED BUS PAD
 - PROPOSED RETAINING WALL / PARAPET WALL
 - PROPOSED CONCRETE BARRIER



SCALES



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No.	DATE	REVISIONS	BY

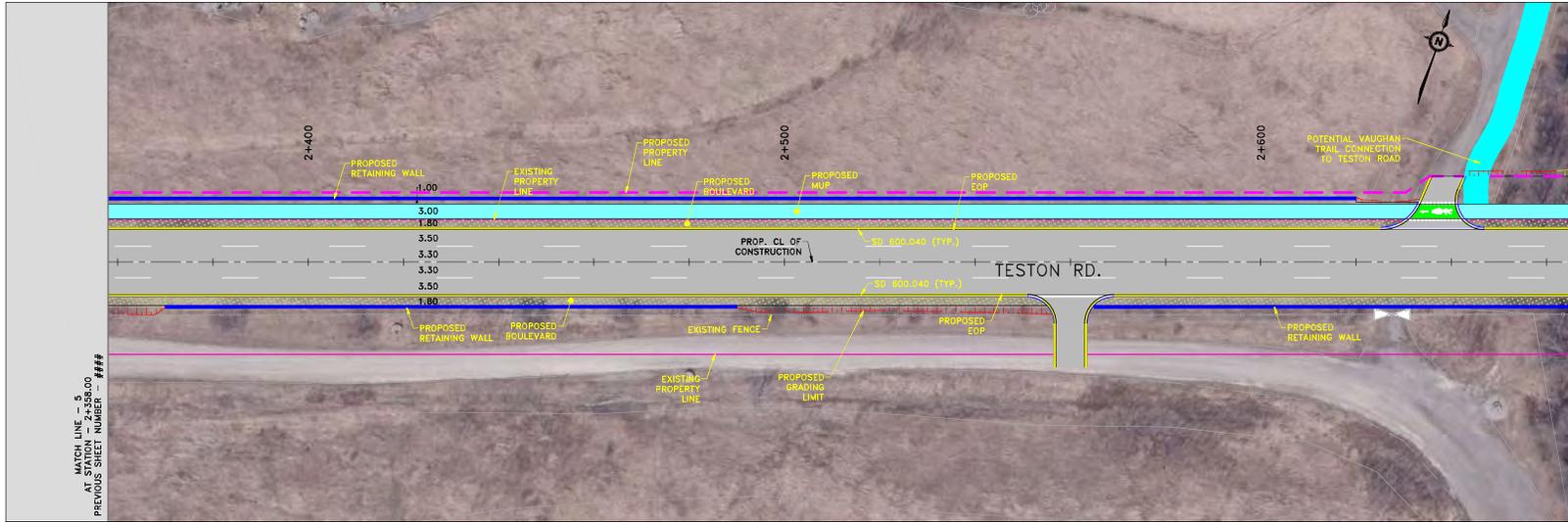


**Public Works
Transportation**

DESIGN MPB
DRAWN YG
CHECKED MPB

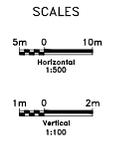
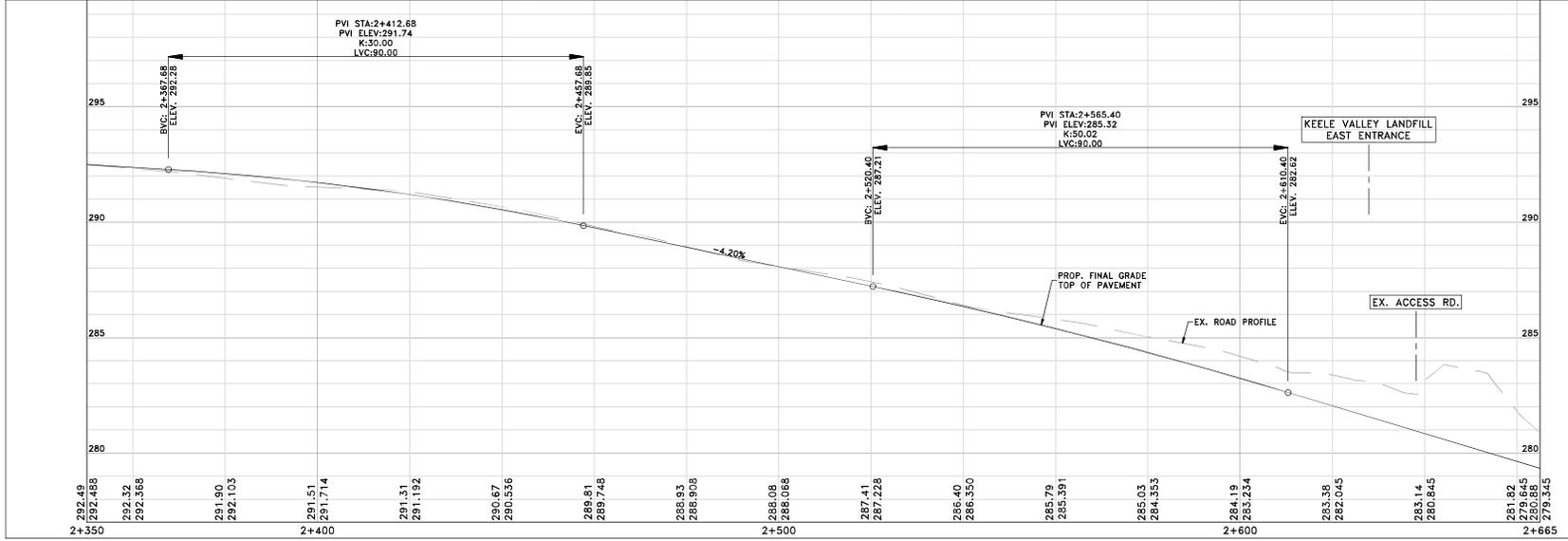
TESTON ROAD (Y.R. 49) RECONSTRUCTION
FROM KEELE STREET (Y.R.6)
TO BATHURST STREET (Y.R.38)
PRELIMINARY DESIGN
2+051 TO 2+358

DWG. NO. 6
CONT. NO.
SHEET NO. 5



MATCH LINE - 6
AT STATION - 2+1855.00
NEXT SHEET NUMBER: ###

- METRIC**
- LEGEND**
- EXISTING ROW AND LOT LINE
 - PROPOSED PROPERTY LINE
 - FUTURE DEVELOPMENT PARCEL
 - PROPOSED PERMANENT EASEMENT
 - PROPOSED TEMPORARY EASEMENT
 - PROPOSED G/L
 - PROPOSED GRADING FILL
 - PROPOSED GRADING CUT
 - PROPOSED EDGE OF PAVEMENT
 - PROPOSED CURB AND GUTTER
 - PROPOSED DRAIN CURB
 - PROPOSED MULTI-USE PATHWAY
 - PROPOSED SIDEWALK
 - PROPOSED CYCLE TRACE
 - PROPOSED BOULEVARD
 - PROPOSED MEDIAN
 - PROPOSED BUS PAD
 - PROPOSED RETAINING WALL / PARAPET WALL
 - PROPOSED CONCRETE BARRIER



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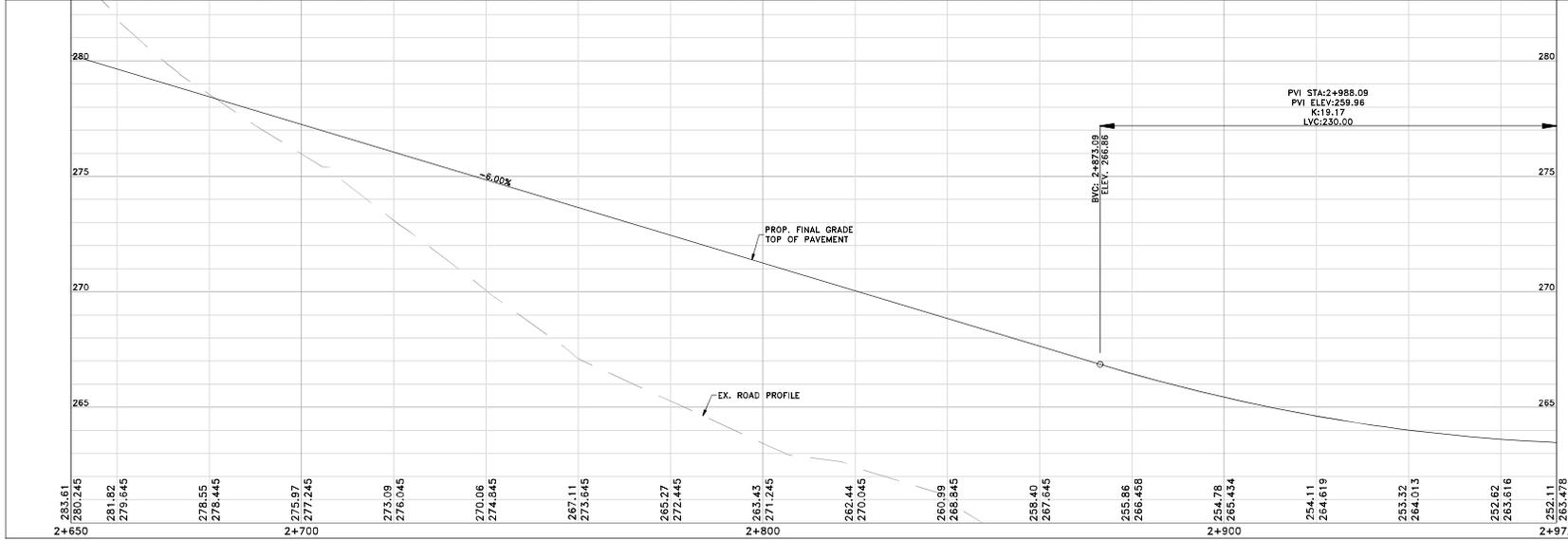
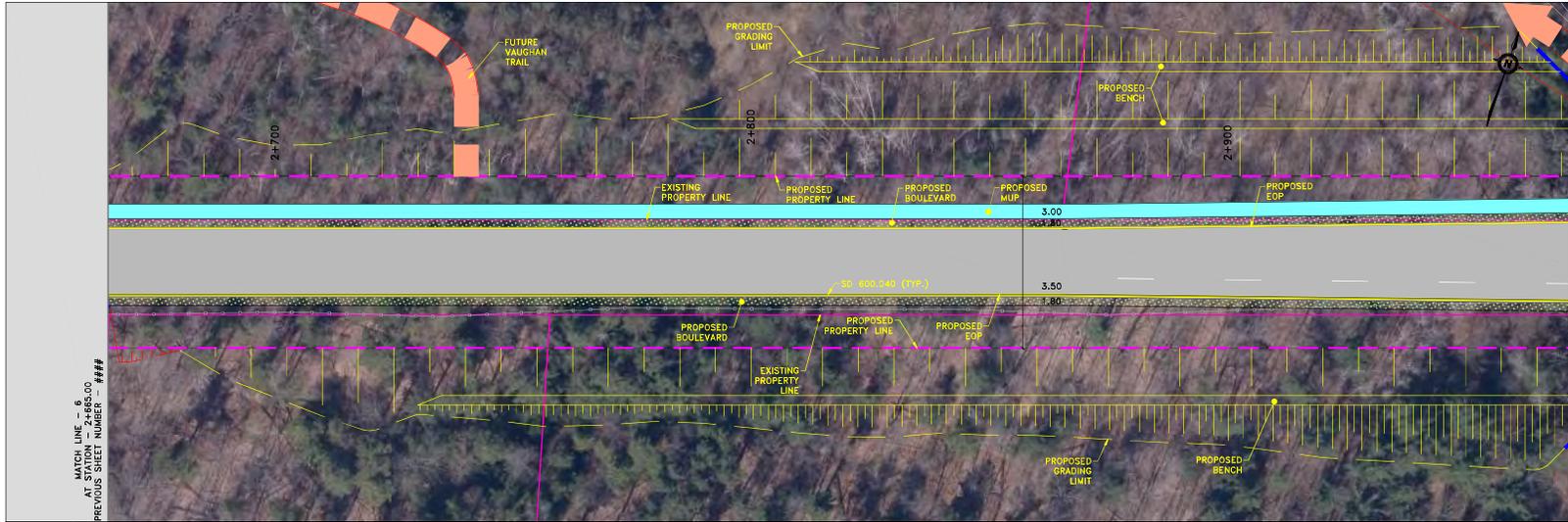
No.	DATE	REVISIONS	BY



DESIGN
MPB
DRAWN
YG
CHECKED
MPB

TESTON ROAD (Y.R. 49) RECONSTRUCTION
FROM KEELE STREET (Y.R.6)
TO BATHURST STREET (Y.R.38)
PRELIMINARY DESIGN
2+358 TO 2+665

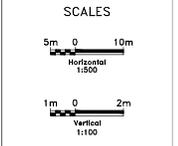
DWG. NO.
7
CONT. NO.
SHEET NO.
6



METRIC

LEGEND

- EXISTING ROW AND LOT LINE
- PROPOSED PROPERTY LINE
- FUTURE DEVELOPMENT PARCEL
- PROPOSED PERMANENT EASEMENT
- PROPOSED TEMPORARY EASEMENT
- PROPOSED C/L
- PROPOSED GRADING FILL
- PROPOSED GRADING CUT
- PROPOSED EDGE OF PAVEMENT
- PROPOSED CURB AND GUTTER
- PROPOSED DROP CURB
- PROPOSED MULTI-USE PATHWAY
- PROPOSED SIDEWALK
- PROPOSED CYCLE TRACE
- PROPOSED BOULEVARD
- PROPOSED MEDIAN
- PROPOSED BUS PAD
- PROPOSED RETAINING WALL / PARAPET WALL
- PROPOSED CONCRETE BARRIER



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No.	DATE	REVISIONS	BY



Public Works Transportation

DESIGN MPB
DRAWN YG
CHECKED MPB

TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)
 PRELIMINARY DESIGN
 2+665 TO 2+972

DWG. NO. 8
CONT. NO.
SHEET NO. 7