

APPENDIX C1.8 – Consultation Record

Attachment #5 – Landfill Property Impacts



Vaughan Landf
- C ty of Vaughan

TESTON ROAD

49

RODINEA ROAD

Keele Valley
Landfill - City
of Toronto

DRAFT

MORRISON HERSHFIELD now Stantec

0 15 30
Meters

SCALE: 1:800

Source: Esri, Maxar, Earthstar
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Vaughan Landf
- C ty of Vaughan

TESTON ROAD

Keele Valley
Landfill - City
of Toronto

MORRISON HERSHFIELD now Stantec

0 15 30
Meters

SCALE: 1:800



Vaughan Landf
- C ty of Vaughan

Keele Valley
Landfill - City
of Toronto

Proposed Property Acquisition
from City of Toronto
+/- Sta. 2+665 to Sta. 2+757 Approx.
Area = 637 m2

Proposed Grading Easement on City of Toronto
Property +/- Sta. 2+665 to Sta.
2+757 Approx. Area = 989 m2

DRAFT



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Keele Valley
Landfill - City
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DRAFT

MORRISON HERSHFIELD now Stantec

0 15 30
Meters

SCALE: 1:800

Table 1 - York Region Responses to City of Toronto Comments

**Table 1: York Region Responses to City of Toronto Comments (Jan. 31, 2025)
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 to Bathurst Street**

Report: Draft Report Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 to Bathurst Street
Primary Author: Morrison Hershfield now Stantec (MHnS); **Proponent:** York Region (YR)

Comment #	Reference to Draft EA	Reviewer Comments & Rationale	Reviewer Proposed Action/Solution	Proponent's Response - DRAFT
1.	Executive Summary – General	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>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>	<p>The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised to acknowledge the potential for landfill gas and/or waste to be present in the transportation corridor right-of-way and the associated health and safety hazards, both during the construction period and after the road corridor has been placed into service.</p> <p>While the Evaluations of Alternatives (Alternatives To The Undertaking, Alternative Methods, Design Alternatives), conducted earlier in the study (and shared with the public, agencies and stakeholders) have not been revised, the following text has been added to the corresponding sections of the report (Sections 6.6, 7.6, 8.10):</p> <ul style="list-style-type: none"> • “More detailed analyses, as the project proceeds through various stages of planning and design development, 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 remain unchanged.”
2.	Executive Summary – Recommendations – Soil/Contamination/Landfills, Page XXVI	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>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</p>	<p>The Executive Summary along with other applicable Sections of the EA Report, including Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, have been revised to acknowledge the potential for landfill gas and/or waste to be present in the transportation corridor right-of-way.</p> <p>Please also see response above under Item 1. regarding implications for the Evaluation of Alternatives.</p>

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		<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>omission to the overall evaluation of Alternatives to the Project should be considered.</p>	
3.	<p>Executive Summary – Recommendations – Soil/Contamination/Landfills, Page XXVI</p>	<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>	<p>The project proponent should edit and reconcile these conflicts throughout the report.</p>	<p>The text at left under Executive Summary - Environmental Effects, Mitigation Measures, and Commitments to Future Work (Section 10) has been replaced with the following:</p> <ul style="list-style-type: none"> • “Some conflicts with existing infrastructure have been identified, even under the narrower recommended interim design, which will require infrastructure relocation or replacement, and which may result in short term disruptions to monitoring programs during construction. All existing landfill accesses will be maintained with some modifications to accommodate the Teston Road widening / extension. Access to landfill monitoring and control infrastructure will be maintained. 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.”
4.	<p>Executive Summary – Consultation - Issues Arising from Consultation – Landfills,</p>	<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</i></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 statement that the interim design would “eliminate impacts the landfills” was incorrect. The entire section on Issues Arising from Consultation on Page XXIX has been removed (including the “eliminate impacts to landfills” text)</p>

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	<p>Page XXIX</p>	<p><i>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 impacts to landfills” is not consistent with the</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>	<p>as it repeated most of the text from a previous section.</p> <p>The initial section on Issues Arising from Consultation (Page IV) has been modified as requested to clarify / confirm that the wider ultimate Recommended Plan implementation timeline aligns with the end of the anticipated service life of the control systems for the Keele Valley Landfill and that the interim design has been created to minimize impacts to the landfills.</p> <p>Please also see above response under Item 3.</p>
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		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 “Road salt may cause issues during landfill leachate testing.” 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.	<p>Table 3-6 has been modified to remove the sentence of concern noted at left and replace it with the following:</p> <ul style="list-style-type: none"> “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. Road salt impacted surface water infiltrating in the vicinity of this groundwater plume may confound the ability to continue to effectively monitor the status of the plume.”
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</p>	The project proponent should revise the meeting title.	The meeting title has been revised to “Update Meeting – Review of Valley Bridge Design Options” and additional summary notes have been added based on the comments at left regarding landfill gas, constructability concerns and that placement of embankment fill could limit access to monitoring wells.

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		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.		
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 borehole logs from the Teston Road Purge Well System were provided to York Region on December 22, 2023. Correspondence record attached to this table.</p>	The project proponent should update the consultation record to include the November 29, 2023 meeting.	The consultation record in Table 3-6 has been updated to include the November 29, 2023 meeting and the follow-up correspondence and slides have been included in Appendix C.6.
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.	<p>The local aquifer names and thicknesses have been added to the Hydrogeology Report.</p> <p>The Project Team was only provided the executive summaries of the two 2018 Golder reports, not the full reports. As such, to support the detail design stage of the project, we would like to request full pdf copies of one or both of the following reports:</p> <ul style="list-style-type: none"> • Golder Associates, 2018. Feasibility and Remedial Options Study – Vaughan Township Landfill Site End Use, January. • Golder Associates, 2018. Feasibility and Remedial Options Study – Keele Valley Landfill Site End Use, January.

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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.	This information has been added to Section 5.6.12.2.1 of the EA Report and to Appendix L – Hydrogeology Report
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.	The text noted on MECP’s D-4 Guideline has been removed from Section 5.6.12.1 of the EA Report. A section on consideration of MECP’s D-Series Guidelines on Land Use and Compatibility has been added to Appendix L - Hydrogeology Report and summarized in EA Report Section 11 – Future Commitments and in the EA Report Executive Summary. 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)), York Region commits to working with the landfill owners and MECP to reasonably mitigate and/or address any impacts or issues of concern.
11.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill; Page 153	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> 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	The project proponent should provide the City of Toronto with a series of figures in plan view and cross section indicating the location of the technical controls and 30 m buffer zone identified in the MECP D-4 Guideline.	The text noted on MECP’s D-4 Guideline has been removed from Section 5.6.12.1 of the EA Report. Please also see response under Item 10. Attached to this Response Table are Figures in plan view and cross section indicating the location of the KVL technical controls and 30 m buffer zone identified in the MECP D-4 Guideline. See Letter Attachments #1, #2 and #3.

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		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."		
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>	<p>The text noted at left (beginning with "As the IEA progresses, ...") has been removed as it does not belong under Section 5 – Existing Conditions.</p> <p>Draft near term and longer-term preliminary design drawings showing the proposed Teston Road design and proposed 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. These have since been updated to refine the grading designs adjacent to the Keele Valley Landfill (KVL) to minimize encroachment.</p> <p>Attached are Figures in plan and cross-section in the vicinity of the KVL that demonstrate the recommended interim Teston Road project's boundaries and access modifications in this area. See Letter Attachments #1 to #5.</p> <p>Section 11.3 Permit Approvals – Section 11.3.5 Environmental Compliance Approvals – states:</p> <ul style="list-style-type: none"> • "The current design of the Teston Road project conflicts with, or has the potential to conflict with existing leachate, and gas collection/ monitoring infrastructure and/or buffer zones associated with the Vaughan Landfill, Keele Valley Landfill, and the Disposal Services Landfill sites. A detailed assessment of the severity of the conflicts is recommended in later design stages. 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

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				<p>of these facilities in consultation with the Ministry of the Environment Conservation and Parks and with input from the Regional Municipality of York.”</p> <p>The following text has been added to the above Section:</p> <ul style="list-style-type: none"> • “York Region also commits to delineating the site boundaries, establishing ownership, easements, and land use covenants and to preparing a series of to scale plan and cross-section drawings to reconcile and confirm project boundaries while also showing property lines, topographical features, above grade and below grade landfill infrastructure. York Region will work with the landfill owners / operators and MECP to ensure that the appropriate monitoring, operating, maintenance access is provided to the landfill infrastructure in the vicinity of the transportation corridor.” <p>Please also see response above under Item 1. regarding implications for the Evaluation of Alternatives.</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.	Reference to the gas-powered electrical generation plant has been removed from the text.
14.	Section 5 – Existing Conditions; Section 5.6.12.1.2 (Keele Valley Landfill) Landfill Infrastructure, Page 153 To Appendix L - Hydrogeology Report Section 3.4 Hydrogeology	<p>The author includes a summary of landfill infrastructure following the statement <i>“A summary of the landfill infrastructure includes: ...”</i></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>	<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 overall evaluation of Alternates to the Project should be considered.</p>	<p>The EA Report text has been updated to include the description of the Keele Valley Landfill infrastructure provided by the City of Toronto at left.</p> <p>Please also see response above under Item 1. regarding implications for the Evaluation of Alternatives. Significant modifications have been made to Appendix L – Hydrogeology Report and Appendix O which has been renamed as the “Soil, Waste and Landfill Gas Report”. The information provided by City of Toronto at left as well as a wealth of other information has been added to these reports. Figures showing the groundwater and leachate-related infrastructure have been improved in the</p>

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	Page 13	<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>		Hydrogeology Report and those showing the landfill gas-related infrastructure have been improved and moved to the Soil, Waste and LFG report. Corresponding updates have been made to the EA Report.
15.	5.6.12.1.2 (Keele Valley Landfill) Landfill Infrastructure, Page 153 To Appendix L - Hydrogeology Report Section 3.4 Hydrogeology Page 14	<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>	The project proponent should correct and clarify the text.	The EA Report and Hydrogeology Report text has been corrected as noted at left.
16.	Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill; Page 154	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</i>	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.	<p>The text at left has been removed from Section 5.6.12.1 of the EA Report.</p> <p>A new Section 9.9 Landfill Infrastructure has been added to the EA Report to provide a list of all potentially impacted landfill infrastructure.</p> <p>A new Section 10.6.7 Landfill Infrastructure has been</p>

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		<p><i>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 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.</p>		<p>added to the EA Report to provide recommendations for assessing and mitigating specific and identified impacts to landfill infrastructure.</p> <p>Significant modifications have been made to Appendix L – Hydrogeology Report. Figures showing the groundwater and leachate-related infrastructure have been improved in the Hydrogeology Report and the impact assessment has been updated.</p> <p>Please also see response under Item 10 regarding the D-4 Guideline.</p> <p>Updated drawings in plan and cross section are attached for the KVL. See Letter Attachments #1 to #5.</p>
17.	<p>Section 5 – Existing Conditions; Section 5.6.12.1 Keele Valley Landfill Page 154</p>	<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 Vally 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>	<p>The text at left has been removed from Section 5.6.12.1 of the EA Report.</p> <p>Significant modifications have been made to Appendix O – Soil, Waste and Landfill Gas Report including additional information and analysis related to the landfill gas header. Figures showing the landfill gas infrastructure have been improved in the above Report and the impact assessment has been updated.</p> <p>Please also see responses to Items 10 and 16.</p>
18.	<p>Section 5 – Existing Conditions; Section 5.6.12.2.1 Groundwater Contaminant Plumes Page 154</p>	<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</i></p>	<p>The project proponent should correct and clarify the text.</p>	<p>The EA Report text in Sections 5.6.12.1.1 and 5.6.12.2.1 text has been revised as noted at left.</p>

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		<p><i>“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 necessary corrections have been made Appendix L – Hydrogeology Report.
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>	<p>Section 5 of the EA Report, Appendix L – Hydrogeology Report, and, Appendix O – Soil, Waste and Landfill Gas, have been reorganized to clarify the ownership of infrastructure for all three landfills and all KVL-related infrastructure is now discussed in KVL-related sections.</p> <p>Please see response under Item 10 regarding the D-4 Guideline.</p>
20.	Section 5 – Existing Conditions; Section 5.6.12.2.2 Vaughan Landfill Infrastructure Page 155	<p>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></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</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</p>	<p>The text at left has been removed from Section 5.6.12.2.2 of the EA Report.</p> <p>Please also see responses above to Items 10, 16 and 19 above.</p>

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		<p>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>information demonstrating how the MECP D-4 guidance is met.</p>	
21.	<p>Section 5 – Existing Conditions; Section 5.6.12.2.2 Landfill Infrastructure Page 155</p>	<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>	<p>The following sentence has been removed from the EA Report text: “The flare facility emits combusted gases that are released into the atmosphere which may induce exposure to the construction workers and future road users.”</p> <p>The Air Quality Assessment Report has been reviewed and is considered to have identified and assessed an appropriate set of receptors.</p>
22.	<p>Section 5 – Existing Conditions; Section 5.6.12.2.2 Landfill Infrastructure Page 155</p>	<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</i> 	<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>	<p>The text at left has been removed from Section 5.6.12.2.2 of the EA Report.</p> <p>York Region is committed to working with the City of Toronto, the City of Vaughan and the owners of the Disposal Services Landfill to ensure that the continued operation of all 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; to provide secure means to protect the landfill infrastructure; and provide ample maintenance access if repair or replacement of the infrastructure is required.</p> <p>Please also see responses above to Items 10, 16 and 17.</p>

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		<p><i>likely fall under the proposed pavement and/or MUP.”</i></p> <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 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>		
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.	<p>The text at left in Section 8.3 has been modified to state:</p> <ul style="list-style-type: none"> • “The second is a smaller cross-section that could allow the roadway to pass between the landfills to the north and south with minimum impacts.” <p>Please see response above to Item 12.</p>
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</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</p>	<p>Section 8.3.2 of the EA Report has been expanded to include a description of the engineered slope on the northern flank of the Keele Valley Landfill and the gravel swales that were added as part of the site’s integrated stormwater management system.</p> <p>Similar text has been added to Section 5 Existing Conditions, Section 5.6.10.2 and Section 5.6.12.1 Keele Valley Landfill.</p>

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		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.	included in the Existing Conditions for landfill infrastructure.	Similar text has been added to Appendix L – Hydrogeology Report.
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)	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> 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.	The project proponent should revise this evaluation to include permitted large volume wells.	The text in the comment at left regarding the dewatering wells has been added to Section 5.6.12.1.2 of the EA Report, and to the appropriate section of the Hydrogeology Report. Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.
26.	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 2.1.3 Municipal Landuse Planning Policies/Goals/Objectives and Subfactor 2.1.3 Muni	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> 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.	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.	York Region has had extensive discussions with the City of Vaughan during the EA Study regarding the City of Vaughan’s plans for the North Maple Regional Park (NMRP) in relation to York Region’s proposed Teston Road extension (which is shown as a proposed future roadway in both the York Region and City of Vaughan’s Transportation Master Plans). Integration of the proposed Teston Road extension with the NMRP has been a key EA consideration. Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.
27.	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 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>	The project proponent should revise this evaluation to include and consider the future land use policies.	The City of Toronto’s status as a private property owner has been noted in Sections 3.4.2 and 5.6.12.1. Please also see response above under Item 1. regarding implications for the Evaluation of Alternatives.

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	Full Evaluation Table in Appendix U:Section 2; Table item 2.1 Land Use Planning Policies, Goals, Objectives; Subfactor 2.1.4 Development Objectives of Private Property Owners	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.		
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.	Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.
29.	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 2.2.7 Municipal Infrastructure and Public Service Facilities	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 “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> 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	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.	York Region has had extensive discussions with the City of Vaughan during the EA Study regarding the City of Vaughan’s plans for the North Maple Regional Park (NMRP) in relation to York Region’s proposed Teston Road extension (which is shown as a proposed future roadway in both the York Region and City of Vaughan’s Transportation Master Plans). Integration of the proposed Teston Road extension with the NMRP has been a key EA consideration. Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.

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		landfills and the nuisance effects of a 4-lane road occupying lands within the park footprint.		
30.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to Full Evaluation Table in Appendix U: Section 2; Table item 2.6 Contaminated Property and Waste Management; Subfactor 2.6.1 Existing landfills under Provincial regulations and ECA requirements	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> 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). 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.	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”. 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. 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.	The Draft EA Report acknowledges that any changes to the landfill infrastructure and/or encroachment within the existing buffer zones will likely require amendments to the Environmental Compliance Approvals (ECAs) under which the landfills operate. Please see response above to Item 12. Please see response above under Item 1. regarding implications for the Evaluation of Alternatives. Updated drawings in plan and cross section are attached for the KVL. See Letter Attachments #1 to #5.
31.	Section 8 – Design Alternatives; Directed from Section 8.3.3 Evaluation Page 215 to Full Evaluation Table in Appendix U –Section 2; Table item 4.3 Safety	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.	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. 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	The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised to acknowledge the potential for landfill gas and/or landfill waste to be present in the transportation corridor right-of-way and the associated health and safety hazards, both during the construction period and after the road corridor has been placed into service. Appendix O - Soil, Waste and Landfill Gas Report has been significantly updated to more fully assess the presence of landfill gas and provide more details around

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			overall evaluation of Alternates to the Project should be considered.	mitigation of this hazard. Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.
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.	Please see response above under Item # 12.
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	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.	Please see response above under Item 1. regarding implications for the Evaluation of Alternatives. Appendix O – Soil, Waste and Landfill Gas Report has been revised to acknowledge that “Landfill gas can be assumed to be present in the subsurface from approximately chainage 1+300 to 2+800 during, and for decades following construction”. The requirement for and examples of mitigation of this hazard are stated in the report.

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		appears to be impacted by the implementation of the transportation corridor.		
34.	Section 8 – Design Alternatives; Section 3: East Don River Valley Crossing Page 218 to Full Evaluation Table in Appendix U: Section 3; Table item 2.6 Contaminated Property and Waste Management; Subfactor 2.6.1 Existing Landfills	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 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.	The project proponent should revise the evaluation to include the City of Toronto/Keele Valley Landfill lands required for the bridge abutments.	York Region has revised Section 9.1.4 of the EA Report to include a note that the recommended design in the vicinity of the City of Toronto’s property at the west edge of the East Don River Valley Crossing may be revised (during detail design) to include a potential retaining wall to avoid direct impacts to the City’s landfill monitoring infrastructure in this area. A vertical extension of the monitoring well may also be a potential solution. Attachment #5 shows a potential grading easement under the latter scenario (a vertical well extension). Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.
35.	Section 9 – Project Description; 9.1.3 Section 1: Teston Road from Rodinea Road to West Side of Don River Valley; Page 240	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.</i> ” And that [The constrained cross-section] will allow the roadway to fit between the landfills with minimum impacts to landfill infrastructure.” 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. 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.	The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met. 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.	Please see responses under Items 16 and 17 regarding the EA Report’s expanded documentation of landfill infrastructure, potential impacts and mitigations. Please see response under Item 10 regarding the D-4 Guideline. Please see response to Item 12. regarding the provision of scaled drawings to the City of Toronto.
36.	Section 9 – Project Description; 9.1.3 Section 1: Teston Road	The author states that “ <i>Existing access to the landfills and the existing gas flare facility will be maintained. A future intersection on Teston</i>	The project proponent should clarify and restructure this section identifying the	Section 9.1.3 has been amended to include cross-references to Sections 5.6.12.1.2 and 5.6.12.2.2 where details are provided regarding the infrastructure systems

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	from Rodinea Road to West Side of Don River Valley; Page 240	<p><i>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>	correct owner/operator of the described systems and infrastructure.	<p>and ownership / operation within Section 2 of the Teston Road corridor (Rodinea Road to West Side of the Don River Valley).</p> <p>Please also see response to Item 12. regarding the provision of scaled drawings to the City of Toronto.</p>
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. 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.	<p>The text at left in Section 9.1.3 of the EA Report has been revised to state:</p> <ul style="list-style-type: none"> • “Some property acquisition is required within Section 2 for the interim and ultimate designs and 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 will be needed to limit grading encroachment particularly along the elevated section between the Keele Valley and Vaughan Township landfills.” <p>Please see response to Item 12. regarding the provision of scaled drawings to the City of Toronto and refinements made to the grading designs adjacent to the Keele Valley Landfill (KVL) to avoid / minimize encroachment.</p>
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</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	Extensive updates have been made throughout the EA Report and Appendices in response to the City of Toronto’s comments and concerns. These include: additional details regarding identified impacts to landfill infrastructure and how these will be addressed to ensure that these systems can continue to support the adherence of the Keele Valley Landfill to the conditions of its Environmental Compliance Approvals – which will likely require amendment. See in particular the Executive Summary; Sections 3.4.2, 5.6.12, 6.6, 7.6, 8.10, 9.1.3, 9.1.4, 9.9 (new), 10.6.5, 10.6.7 (new), 11.3.5, 11.4.4; and,

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		<p>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>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>	<p>Appendices C.1, L and O.</p> <p>A statement has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure, operations, monitoring and contingencies associated with the construction of the Teston Road project.</p> <p>Please see response above under Item 1. regarding implications for the Evaluation of Alternatives.</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>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>	<p>The reference to “leachate monitoring wells” has been changed to “groundwater monitoring wells”.</p> <p>A new Section 9.9 Landfill Infrastructure has been added to the EA Report to provide a list of all potentially impacted landfill infrastructure.</p> <p>Please also see responses to Items 10, 16, 17 and 38.</p>

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		<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>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 permeant 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>	<p>Section 9.9 Property Requirements has been changed to Section 9.10.</p> <p>Please also see response to Item 12. regarding the provision of scaled drawings to the City of Toronto and refinements made to the grading designs adjacent to the Keele Valley Landfill (KVL) to minimize encroachment.</p> <p>Please also see response to Item 10.</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</i></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>	<p>An additional bullet has been added to Table 10-1 Source Water Protection / Hydrogeology under the Potential Environmental Effect(s) column for “Potential conflicts with purge well leachate main and/or monitoring wells”.</p> <p>Potential Significance has been changed to “S” for Significant to reflect potential “Permanent transcendence or contravention of legislation, standards or environmental guidelines or objectives” due to the potential need for</p>

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		<p><i>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 plume chemistry are neither reversable, localized, or hardly discernible in both the temporal and spatial sense.</p>		<p>amendments to the ECAs if any changes are made to the landfill infrastructure and/or access.</p> <p>Level of Significance Following Mitigation has been kept at N for Negligible for Infrastructure / groundwater and plume chemistry and levels, but has been changed to S for Significant for Potential Amendments to ECAs (if any changes are made to the landfill infrastructure and/or access).</p>
42.	<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 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><i>and offers recommended mitigation Measures:</i></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</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>In Table 10-1 Source Water Protection / Hydrogeology:</p> <ul style="list-style-type: none"> • “Potential conflicts with purge well leachate main and/or monitoring wells” has been added to Potential Environmental Effects • “Potential implications on landfill Environmental Compliance Certificates” has been added to Potential Environmental Effects. • “Enhanced monitoring” has been removed from the list of Recommended Mitigation Measures. • Protection of monitoring wells has been added to the list Recommended Mitigation Measures. • Application for a permit to take water (PTTW), or registration in the Environmental Activity and Sector Registry (EASR) has been added to Commitments to Future Works. • Potential Significance and Level of Significance

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		<p>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 project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	<p>following Mitigation has been revised to “N (Negligible/Moderate) for Infrastructure / groundwater and plume chemistry and levels, and, to S (Significant) for Potential Amendments to ECAs”</p> <p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals.</p> <p>Please also see response to Item 38.</p>
43.	<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 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><i>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:</i></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</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>	<p>Please see response to Item 42 above.</p>

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		on the Toronto's (and Vaughan's) ability to manage compliance of the landfills. Changes in groundwater plume chemistry are neither reversible, 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>	<p>The details at left regarding the Teston Road Purge Well System have been added to Section 5.6.12.2.2 of the EA Report as well as to relevant sections of the Hydrogeology Report.</p> <p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals.</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> 	<p>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.</p>	<p>In Table 10-1 Archaeology, the following has been added as a Commitment to Future Works in relation to any additional Stage 2 test pit surveys:</p> <ul style="list-style-type: none"> • “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.”

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46.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Heritage Page 261	<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 construction activities should be considered and implemented as a vibration criteria in addition to the criteria identified in Appendix G.</p>	<p>In Table 10-1, Construction, an additional Valued Ecosystem Component for Vibration has been added to address potential vibration effects on adjacent buildings, structures, utilities and other infrastructure from construction activities. The criteria in Appendix G are referenced and the City of Toronto vibration limits for construction activities are to be considered and implemented as additional vibration criteria for City of Toronto owned / operated infrastructure.</p>
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</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>	<p>Commitments to Future Works has been modified to include further consideration of retaining walls, and, the potential deferral of westbound left-turn from Teston Road to Rodinea Road to ultimate stage of project to reduce property acquisition and easements.</p> <p>Please also see response to Item 12. regarding the provision of scaled drawings to the City of Toronto and refinements made to the grading designs adjacent to the Keele Valley Landfill (KVL) to avoid / minimize encroachment.</p> <p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals.</p>

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		<p>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>		
48.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Access Page 261</p>	<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>	<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.</p>	<p>Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, has been amended to include “Potential impacts to access for landfill environmental compliance monitoring during construction” as a Potential Environmental Effect, along with a Recommended Mitigation Measure to “Include provision in construction contract documents that access to landfill monitoring and compliance infrastructure must be maintained during construction.”</p> <p>Please see response above to Item 12.</p>
49.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Contamination Page 262</p>	<p>The author states “<i>four</i>” <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><i>and further categorizes the potential significance of this (and other effects) as Significant (S).”</i></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</p>	<p>The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised 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 Table 10-1 section on Contamination has been modified to include the following Recommended Mitigation Measures:</p> <ul style="list-style-type: none"> • Add membrane barriers to prevent landfill gas

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		<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>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>	<p>migration into storm sewers.</p> <ul style="list-style-type: none"> • Develop mitigation plan should any landfill related waste and/or gas be found during excavation activities. • Add Operational Constraints to construction contract to address risk of landfill gas being encountered in trenches and storm sewers and potential for pockets of waste to be encountered (which will have to be excavated / removed). <p>The Table 10-1 section on Contamination has been modified to include the following Commitments to Future Works:</p> <ul style="list-style-type: none"> • Conduct additional field investigations at detail design to verify presence of waste within right-of-way. • Remove waste from right-of-way (if found to be present). <p>Table 10-1 has been expanded to include an additional Air Quality item under Construction to address the potential for landfill gas to be present. See response to item 52 below.</p>
50.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Construction; Valued Ecosystem Components: Contamination Page 262</p>	<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</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>	<p>The Executive and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised 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. Additional Recommended Mitigation Measures and Commitments to Future Works have been added to Table 10-1 to address landfill gas and waste. See response to Item 49. Appendix O has been renamed as the “Soil, Waste and Landfill Gas Report” and has been significantly upgraded to provide more information on existing conditions, potential impacts and required mitigation measures to deal with waste and landfill gas. The following statement has been added to the report: “Landfill gas can be assumed to be present in the subsurface from approximately chainage 1+300 to 2+800 during, and for decades following, construction.”</p>

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		<p>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 address the level of Commitment that may be required. This effect should be included in the existing conditions assessment.</p>		
51.	<p>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</p>	<p>The authors provide a “<i>Commitment to Future Works</i>”:</p> <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>” 	<p>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.</p>	N/A
52.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Operations & Maintenance; Valued Ecosystem Components: Air Quality Page 263</p>	<p>The author does not identify landfill (methane) gas as a Potential Environmental Effect during operations and maintenance of the road.</p> <p>Comment: The potential for landfill (methane) gas to be present and migrate along preferential pathways in the subsurface will persist after construction.</p>	<p>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>”</p> <p>The proponent has not demonstrated how potential landfill gas will be mitigated during operation and maintenance of the proposed project.</p>	<p>Landfill (methane) gas has been added under the Valued Ecosystem Component Air Quality to Table 10-1 as a Potential Environmental Effect during Operations and Maintenance of the road.</p> <p>Appendix O has been renamed as the “Soil, Waste and Landfill Gas Report” now contains the following statement: “Landfill gas can be assumed to be present in the subsurface from approximately chainage 1+300 to 2+800 during, and for decades following, construction.” The report has been significantly upgraded to provide more information on existing conditions, potential impacts and required mitigation measures to deal with waste and landfill gas. The report includes the requirement for avoiding migration of landfill gas within and into utility trenches and works and mitigations measures to protect maintenance workers.</p> <p>Please see response to Item 10 regarding compliance with MECP’s D-Series Guidelines on Land Use and Compatibility.</p>

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53.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Table 10-1; Project Phase: Operations & Maintenance; Valued Ecosystem Components: Access Page 264	<p>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></p> <p>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></p> <p>Comment: The City of Toronto has not been provided preliminary design details to confirm the validity of this statement.</p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p> <p>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.</p> <p>The project proponent should edit and reconcile this omission throughout the report.</p>	<p>In Table 10-1 Potential Environmental Effect(s) to Access under Operations and Maintenance, the text at left has been modified to</p> <ul style="list-style-type: none"> • “Potential to impede the operations of the landfills, their environmental compliance monitoring programs, and/or access to their infrastructure (including underground infrastructure).” <p>Please also see responses to Items 10, 16, 38 and 39.</p>
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	<p>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></p> <p>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.</p>	<p>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).</p> <p>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.</p>	<p>A reference regarding the ownership by the City of Toronto of the lands requiring Stage 2 Archaeological test pit survey has been added to Section 10.5.1 Archaeology of the EA Report.</p> <p>A note has been added to Section 9.1.4 of the EA report that a retaining wall may be considered during detail design at this location to reduce the encroachment on City of Toronto property and avoid potential conflicts with landfill monitoring well (# 13/84).</p>
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.	References to Appendix O have been added to Section 10.6.1.4 and 10.6.1.5 of the EA Report.
56.	Appendix O: Soils Investigation Report; Section 2.3 Field Screening Measurements	For field screening methodology, the author states: <i>“Methane elimination mode turned on.”</i>	The project proponent should provide justification why the field equipped for soil	Justification has been added to the respective section of Appendix O Soil, Waste and Landfill Gas Report.

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	Page 3	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.	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.	Appendix O has been modified to make its description of the hydrogeology more consistent with the Appendix L, the Hydrogeology Report, which itself has been updated to provide more site-specific information.
58.	Appendix O: Soils Investigation Report; Section 3.3 Soil Conditions Page 6	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> Comment: There is no measurement of 15 ppm in Table C-0.	The project proponent should revise the report text or correct Table C-0.	The report text has been revised.
59.	Appendix O: Soils Investigation Report; Section 3.7 Landfill Waste Page 9	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</i>	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site. The project proponent should revise the statement <i>“that waste may be present in the</i>	The information provided by the City of Toronto has been incorporated in the text of the report (Appendix O) and into Figures 3a-c. The statement regarding isolated pockets has been revised.

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		<p><i>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><i>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>	<p>Appendix O which has been renamed as the “Soil, Waste and Landfill Gas Report” now contains the following statement: “Landfill gas can be assumed to be present in the subsurface from approximately chainage 1+300 to 2+800 during, and for decades following, construction.” The report has been significantly upgraded to provide more information on existing conditions, potential impacts and required mitigation measures to deal with waste and landfill gas.</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>	<p>The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised to acknowledge the potential for landfill waste and/or 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, and to include additional mitigation measures.</p> <p>Appendix O has been modified to ensure that mitigation measures to address the presence of landfill gas below the road allowance will be included in the design of the project between chainage 1+300 and 2+800.</p>

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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. Clarify: The author should clarify if groundwater was detected in these boreholes and if so, why is this omitted in the report text.	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	The symbols were added to indicate that the wells were dry on completion. The symbols have been removed.
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	“Boreholes not completed as monitoring wells were backfilled with drill cuttings” has been added to the report.
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.	The following text has been added to Section 10.6.1.5 of the EA Report and to Section 5.1 of Appendix O: Investigations of the presence of landfill waste within the road right-of-way may be in proximity to existing landfill infrastructure. Due care should be exercised to avoid existing infrastructure when conducting any subsurface investigations.
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 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	The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised to acknowledge the potential for landfill waste and/or gas to be present in the transportation corridor and the associated potential health and safety hazards, both during the construction period and after the road corridor has been placed into service. Please see response to Items 10 and 59 above.

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		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.]	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 & 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 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 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> 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.	[The project proponent should modify accordingly references to the operation of landfill gas collection systems in statements on plans to mitigate the hazards associated with landfill gas during construction activities. 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. 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.	The Executive Summary and Section 10.2 Table 10-1: Potential Effects, Significance, Mitigation Measures & Commitments, of the EA Report have been revised to acknowledge the potential for landfill waste and/or gas to be present in the transportation corridor and the associated potential health and safety hazards, both during the construction period and after the road corridor has been placed into service. Section 10.6.1.6 Soil Management of the EA Report has been modified to remove the statement that “the landfill operator should be immediately notified”. Section 10.6.1.6 Soil Management of the EA Report and the respective Section of Appendix O has been modified to include the following: <ul style="list-style-type: none"> • “Any changes in the subsurface resulting from the proposed project that alter conditions, create preferential pathways or increase risk for gas migration are to be controlled / managed by York Region as part of the project.”
66.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.2.1 Drainage Page 298	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>	The project proponent should clarify and restructure this section to address this conflict.	Please see response to Item 67 below.

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		<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>		
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 the plume in the upgradient area could be problematic for overall management and compliance of the Site.</p>	<p>The project proponent should incorporate site specific information into the Future Commitments.</p>	<p>Section 10.6.2.1 of the EA Report has been modified to replace the second sentence at left with the following:</p> <ul style="list-style-type: none"> • “It should be noted that the City of Toronto has commented that 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. They have also advised that 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 the plume in the upgradient area could be problematic for overall management and compliance of the Site. <p>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>
68.	<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</i></p>	<p>The project proponent should provide a summarizing document containing information demonstrating how the MECP D-4 guidance is met.</p>	<p>Please see response to Items 10 and 67 above.</p>

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		<p><i>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 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.	<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>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>	<p>The project proponent should be aware that Appendix K is not referenced in the text of the report.</p>	<p>The reference to Appendix L in Section 10.6.2.1 has been corrected to refer to Appendix K Drainage and Stormwater Management Report.</p> <p>Section 9.4.4. of the EA Report has been expanded to include a summary of the key elements of the Stormwater Management Plan.</p>
70.	<p>Appendix K – Drainage and Stormwater Management Report Section: Page: 298</p>	<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. 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>	<p>Table 16 (now updated) of Appendix K provides a summary of the stormwater management recommendations by outlet. This has now been added to Section 9.4.4. of the EA Report.</p>
71.	<p>Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.4 Source Water Protection</p>	<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>The project proponent should clarify and re-word this section.</p>	<p>The text at left has been deleted from Section 10.6.4 – Source Water Protection, of the EA Report.</p> <p>Please also see responses to Item 67 above.</p>

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	Page 298	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 presence of landfill-related groundwater plumes does not make an aquifer more or less vulnerable.		Appendix L – Hydrogeology Study has been reworded and clarified.
72.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	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> 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.	The project proponent should edit and reconcile the statement that the interim plan will eliminate impacts to landfills. 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.	While Section 10.6.5 – Hydrogeology, does not state that the “interim plan will eliminate impacts to landfills”, this wording (or similar) has been removed from the Executive Summary. Please also see responses above under Items 1 and 10.
73.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.5 Hydrogeology Page 299	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> 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.	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	Section 4.4.2 of Appendix L – Hydrogeology Report has been modified to include a water balance calculation to support the statement that the hard surfacing will have an imperceptible impact on the concentrations being monitored.

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		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.		
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>	The project proponent should clarify and restructure this section to address this conflict.	See the response to Comment 73.
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</p>	The project proponent should ensure that all sources of data are incorporated into the conceptual model for the Site.	See the response to Comment 73.

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		be insignificant. Was a mass balanced approach used? If so, the author should provide the City of Toronto with the details and assumptions.		
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.	Appendix L – Hydrogeology Report and Appendix O – Soil, Waste and Landfill Gas Report have been significantly rewritten to better assess potential long-term impacts on Toronto’s (and Vaughan’s) ability to manage compliance of the landfills. Please also see response to Item 10 above.
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.	Table 10-1 has been updated to include 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</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>	Extensive updates have been made throughout the EA Report and Appendices in response to the City of Toronto’s comments and concerns. These include: additional details regarding identified impacts to landfill infrastructure and how these will be addressed to ensure that these systems can continue to support the adherence of the Keele Valley Landfill to the conditions of its Environmental Compliance Approvals – which may

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		<p><i>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>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>	<p>however require amendment. See in particular the Executive Summary; Sections 3.4.2, 5.6.12, 6.6, 7.6, 8.10, 9.1.3, 9.1.4, 9.9 (new), 10.6.5, 10.6.7 (new), 11.3.5, 11.4.4; and, Appendices C.1, L and O.</p> <p>A clear summary of the identified landfill infrastructure impacts and ownership is provided in Appendix L - Hydrogeology Report and Appendix O – Soil, Waste and Landfill Gas Report and in Sections 9.9 and 10.6.7 of the EA Report.</p> <p>While Section 10.6.5 – Hydrogeology, does not state that the “interim plan will eliminate impacts landfills”, this wording (or similar) has been removed from the Executive Summary.</p> <p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals.</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>	<p>The respective section of Appendix L – Hydrogeology Report has been edited to clarify the slight and temporary nature of any impact on the plume. Enhanced monitoring has been removed as a mitigation measure.</p> <p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance Approvals.</p>
80.	Section 10 – Environmental Effects, Mitigation Measures & Commitment to Future Work; Section 10.6.6 Contamination Overview Study & Phase One ESAs Page 301	<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</i></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</p>	<p>Please see response above under Item # 12 regarding provision of drawings to the City of Toronto.</p> <p>The Phase One ESA for Property 5 has been updated to include a reference to the likely presence of landfill waste and/or gas at the KVL.</p>

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	Appendix N – Phase I ESA Property 5 Figures	<p><i>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>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 Page 304	<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 archaeological potential and requires a Stage 2 archaeological assessment test pit survey at five metre intervals prior to any soil disturbing activities.”</i></p> <p>Comment: Permission to access property would need to be provided by the City of Toronto.</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>	<p>Section 11.2.3 of the EA Report has been amended to include a statement that the City of Toronto, who owns these lands, would need to grant permission to provide access for future investigations.</p>
82.	Section 11 – Future Commitments; Section 11.2.6 Phase 2 Environmental Site Assessment Page 305	<p>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></p>	<p>This Commitment to Future Works is noted. The City of Toronto would need to grant permission to provide access for future investigations.</p>	<p>Section 11.2.6 of the EA Report has been amended to include a statement that:</p> <ul style="list-style-type: none"> • “Permissions to access these areas would need to be obtained from the property owners prior to conducting these investigations.”
83.	Section 11 – Future Commitments; Section 11.3.5 Environmental Compliance Approvals	<p>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</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</p>	<p>A statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure has been added to the Executive Summary and to Section 11.3.5 Environmental Compliance</p>

**Table 1: York Region Responses to City of Toronto Comments (Jan. 31, 2025)
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 to Bathurst Street**

	Page 307	<p><i>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></p> <p>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.</p>	<p>recommendations that would alter the conditions of the Environmental Compliance Approvals.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	<p>Approvals.</p> <p>Additional text has been added to Section 11.3.5 to address the comment at left as follows:</p> <ul style="list-style-type: none"> • "The landfill owners / operators cannot proactively or voluntarily amend the ECAs for their respective sites to address changes required due to the proposed Teston Road project. Any future amendments would be subject to legal and regulatory review and consultation. The City of Toronto, for example, has indicated that they cannot guarantee that any amendments can be implemented."
84.	Section 11 – Future Commitments; Section 11.3.5 Environmental Compliance Approvals Page 307	<p>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>"</p> <p>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.</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 conditions of the Environmental Compliance Approvals.</p> <p>The project proponent should include MECP concurrence with any changes to landfill infrastructure in the IEA Report.</p>	<p>Please see response above under Item 83.</p>
85.	Appendix D.1 – Transportation System Technical Report #1, 4.1.1 North Maple Regional Park	<p>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 hectares</i></p>		<p>Section 5.4.3.1 – North Maple Regional Park, has been revised to include the following text in response to the comment at left:</p> <ul style="list-style-type: none"> • "Through the CEA study's consultation program, the City of Toronto has advised that they make no

**Table 1: York Region Responses to City of Toronto Comments (Jan. 31, 2025)
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 to Bathurst Street**

		<p><i>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>		<p>guarantee regarding the incorporation of Keele Valley Landfill Site into North Maple Regional Park. They have noted that this process would be subject to legal and regulatory review, that the timing and phasing of the project has not been confirmed, and that the estimated potential timeframe is a minimum of 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>	<p>The Contamination Overview Study has been amended to acknowledge the potential for landfill waste and/or gas to be present in the vicinity of 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</i></p>	<p>The proponent should revise the Phase One ESA for Property 5 to include mention of landfill waste and/or gas.</p>	<p>The Phase One ESA for Property 5 has been updated to include a reference to the likely presence of landfill waste and/or gas at the KVL.</p>

**Table 1: York Region Responses to City of Toronto Comments (Jan. 31, 2025)
Draft Report Individual Environmental Assessment for the Teston Road Area
Transportation Improvements, Highway 400 to Bathurst Street**

		<p><i>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>		
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>	<p>Table 10 1 - Potential Effects, Significance, Mitigation Measures & Commitments, under Construction – Climate Change Valued Ecosystem Components, has been updated to include a Potential Environmental Effect for the “Potential disruption to existing landfill gas (methane) collection and flaring systems”, and a Commitment to Future Works to “Ensure there is no post-construction loss of function of the existing landfill gas collection and flaring systems associated with the implementation of the Teston Road project”.</p>

Review of Responses to City of Toronto (CoT) Comments on Draft YR Teston Road Area EA Report

Project/File: York Region Individual / Comprehensive Environmental Assessment and Preliminary Design for Teston Road Area between Highway 400 and Bathurst Street (P-19-218)

Date/Time: September 16, 2025 / 2:00 pm – 3:00 pm

Location: MS Teams

Next Meeting: n/a

Attendees: Billy Cheung (York Region (YR), PM), Praveen John (YR, Engineering Manager)
 Lynda Mulcahy (CoT, Manager of Closed Landfill Operations), David Gordon (CoT, Sr Project Manager, Closed Landfill Operations), Tracy Meldrum (WSP, on behalf of CoT, Hydrogeologist), Victoria Shortreed (GHD, on behalf of CoT)
 Andrew Harkness (Stantec, PM), Meghan MacMillan (Stantec, Environmental Planner), Martin Blouin (Stantec, Deputy PM & Design Lead), Ant West (Stantec, Contamination / Waste & Groundwater Lead)

Absentees:

Distribution: Distribution List

Item:	Action:
<p>Introductions</p> <p>Meeting attendees provided an introduction.</p>	
<p>Project Status Update</p> <ul style="list-style-type: none"> • Praveen John (PJ) provided a high-level project update. York Region (YR) is completing a final round of consultation with review agencies prior to finalizing the Comprehensive Environmental Assessment (EA) report. <ul style="list-style-type: none"> ○ YR / Stantec are preparing to meet with MECP to finalize and prepare for submission of the EA report for MECP review. ○ Meetings have been held with the City of Vaughan (CoV), Toronto and Region Conservation Authority (TRCA) to discuss their comments on draft EA documentation. ○ YR will be bringing a report to Council at the end of September regarding CoV's interest in taking over the project. No decision has been made at this point. 	
<p>Open Discussion of Comments</p> <ul style="list-style-type: none"> • Lynda Mulcahy (LM) stated that additional comments were sent yesterday afternoon to Stantec and YR. • Tracy Meldrum (TM) summarized the key comments: <ul style="list-style-type: none"> ○ Class D vehicles (greater than 30ft in length) need to be provided safe ingress / egress to the landfill site for operations 	

Item:	Action:
<p>and maintenance. If the future Teston Road goes in as planned, a turn-around needs to be provided on the side road.</p> <ul style="list-style-type: none"> ▪ Andrew Harkness (AH): YR commits to ensuring access will be maintained and adequate for the required vehicles. Refinement of the design of the access will be done during the detailed design phase, however the commitment to provide this access will be documented. ▪ PJ noted that turning templates would be applied to access designs to ensure they can accommodate the appropriate size of vehicle. <ul style="list-style-type: none"> ○ TM: when does YR expect to have legal agreements drafted, for property impacts? PJ confirmed that agreements will be aligned with the Environmental Compliance Approval (ECA) amendments needed for the landfill. ○ LM: noted that if the project is transferred to CoV, stakeholders such as CoT will no longer be dealing with YR once the EA is complete. How will CoV be informed of commitments made and will they understand complexity of implementation issues? <ul style="list-style-type: none"> ▪ PJ noted that all draft reports are shared with CoV through a single point of contact that is responsible for circulating to internal departments (Walid Omar). Stantec / YR agreed to further follow up with CoV. ○ TM requested a copy of the revised Stormwater Report. All stormwater is being conveyed completely to outlets at the end of the Keele Valley site, is that correct? <ul style="list-style-type: none"> ▪ AH confirmed this is correct, and that Stantec or YR will send the Stormwater Report. ○ VS noted that the Ministry of the Environment, Conservation and Parks (MECP) will require justification for moving landfill gas probes. <ul style="list-style-type: none"> ▪ AH noted that the design team has tried to minimize impacts on the Keele Valley Landfill; there will be follow up during detailed design to ensure probes are accurately located. The design will be refined in discussions with CoT. ○ VS noted that mitigation measures for landfill gas are vague; consider additional language about what systems will be used and principles to be applied during detailed design. ○ VS noted there are regulations regarding separation distance of a road to a flare facility (15 m for non-on-site road); the regulator may want to review siting of the road relative to the flare. ○ TM noted there will need to be a review of existing agreements to ensure they are still valid. <ul style="list-style-type: none"> ▪ AH confirmed that the potential need for modifications to agreements will be reviewed in the next phase for project and has been documented in the EA. ○ TM also agreed it would be appropriate given the longevity of post-closure phase, to look at monitoring wells on an individual 	<p>Stantec / YR to send Stormwater Report to CoT</p>

Item:	Action:
<p>basis and confirm what is "nice to have" vs. what is still necessary.</p> <ul style="list-style-type: none"> • TM asked at what stage of MECP review is the EA? <ul style="list-style-type: none"> ○ AH confirmed that the District Office has had a chance to review; the project team will be meeting with the MECP contact in EA approvals branch as a next step. MECP will receive all responses to stakeholder comments submitted on the draft EA report. ○ YR / Stantec received detailed comments on draft reports from MECP (including from the District); responses have been provided, reports have been revised and MECP has stated they have no further comments. ○ AH noted the record of consultation (including draft EA report comments and their resolution) will be included with the final EA report. • LM questioned how it will work if a separate entity is responsible after the EA phase (i.e., if the project is transferred to the CoV). How would this affect the implementation of the project? <ul style="list-style-type: none"> ○ PJ explained that a compliance report is required at the end of every year following completion of the EA; this is an ongoing process until completion. Whoever implements the project must adhere to commitments and conditions of EA approval. YR is asking MECP for any specific guidance on this, if CoV takes over (e.g., should they be made a co-proponent?). ○ LM asked who receives the annual compliance monitoring report? Are key stakeholders circulated? PJ noted it is only MECP. • LM asked how will stakeholders be kept informed following the EA? Will there be a Communications Plan? <ul style="list-style-type: none"> ○ PJ noted that throughout design milestones stakeholders will be engaged. ○ LM noted that given the size and complexity of this project, communications will be important. CoT would like to ensure CoT is fully engaged in later phases of the project. • LM asked where the project sits in YR's capital plan? <ul style="list-style-type: none"> ○ PJ stated the plan identifies a 2030 construction start (for Teston Road from Keele Street to Dufferin Street), which gets reviewed every year. • AW noted an excerpt from the EA report, acknowledging that any changes to landfill infrastructure will require amendments to ECAs, which are complex and have been established over many years. Owners would need to submit these applications with significant collaboration with YR. <ul style="list-style-type: none"> ○ LM agreed the owner of a site must be the applicant. ○ TM noted that technical studies will need to be done in advance, in consultation with stakeholders. The "why, where, and how" need to be defined before an application is made. Potentially multiple amendments for different functions may be required. Some technical studies may require monitoring. 	

Item:	Action:
<p>Next Steps:</p> <ul style="list-style-type: none">• AH stated that YR is targeting submission of the final EA by the end of October to MECP; however, this could be delayed by the decision about CoV taking over the project.• PJ noted that MECP has a new process since last year, several departments (8) need to sign off before a Notice of Completion is issued. MECP will do another round of consultation with stakeholders on the final documentation; typically, 6 months is allowed for this.• LM noted the schedule is aggressive for construction in 2030, considering the regulatory processes that need to be managed. CoT does not want to be in a position of rushing approvals to meet a politically motivated schedule.<ul style="list-style-type: none">○ PJ acknowledges the political priority for CoV to get this project implemented. Time required for amendments to ECAs is a valid reason to adjust timelines if needed.• VS noted that any schedule will need to consider time to complete technical studies needed for ECA amendments, provide rationale for the amendments, and compile an application package. This will require time and resources on CoT's side.• Stantec will circulate minutes and prepare a letter response to the questions submitted by CoT (and consultants).	<p>Stantec to circulate meeting minutes and comment responses.</p>

Meeting adjourned at 3 PM.

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Sincerely,

Stantec Consulting Ltd.

Meghan MacMillan RPP, MCIP
Associate, Senior Environmental Planner
Phone: (613) 703-6916
Mobile: (343) 996-9967
meghan.macmillan@stantec.com

September 26, 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 September 15, 2025 Comments on the Teston Road Area Draft Comprehensive Environmental Assessment (CEA) Report
Our File: T02 99816 EA Corr**

Dear Lynda,

York Region (YR) appreciates the comments received from the City of Toronto (City) and your participation in the Teston Road Area Improvements Comprehensive Environmental Assessment (CEA) process – in relation to the Keele Valley Landfill (KVL). The following is a response to your emailed comments of September 15, 2025 – which follows on our previous letter and responses of August 12, 2025 to your comments dated January 31, 2025 on the Draft EA documents. Our responses below also reflect discussions at our meeting of September 16, 2025.

1. In Section C(f) the response letter identifies that *“Draft interim and ultimate preliminary design drawings were previously provided and have been updated to refine the grading and retaining walls.”*
 - The revisions to the original ‘concept drawings’ are in attachment #4 and #5 of the response letter. These are an improvement although the uncertainty in the location of surveyable infrastructure still seems to be an issue.

York Region Response: The revised Hydrogeology Study and Soil, Waste and Landfill Gas Report identify landfill infrastructure at a level of detail appropriate for this stage of the project. The Region will, with appropriate permissions to enter, undertake additional field investigations and site surveys at the detail design stage of the project to further locate and identify all infrastructure that may be in conflict with the Teston Road project.

- The four cross sections attachment #1 do not capture the changes at the intersection of the purge well access road. The access road to the area of the Teston Road purge wells needs to be able to accommodate the safe ingress and egress, including turnaround, of Class D vehicles (water well drill rig – similar dimensions to a firetruck).

York Region Response: The Region commits to accommodating safe ingress and egress of Class D vehicles to the Teston Road Purge Well System (TPWS) access road along the north side of the proposed Teston Road at approximately Station 2+150. Turning templates will be applied to the access design and the proposed design will be shared with both the City of Toronto and City of Vaughan for review and comment, including on how best to accommodate large vehicle turnaround which it is understood is typically required on a quarterly basis (4 x per year).

2. In Section D (a) and (c) response letter states that *“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.”*

- This addition is acknowledged and appreciated; however, it seems to focus on existing infrastructure and this needs to include future operation and maintenance effect of the road should additional requirements be required of Toronto. The above statement should also clarify that additional requirements for either existing AND future compliance measure includes 'at the cost of York Region'.

York Region Response: The Region commits to working with the City of Toronto on any Environmental Compliance Approval (ECA) Amendments required to accommodate the construction and operation of the Teston Road extension. It is understood that these may include additional or modified requirements associated with existing and / or future compliance measures. The sharing of costs by the Region can be discussed at a future date.

- "Reasonable and timely" could be open to interpretation. This is a fairly unique project, given the sensitivity of the adjacent landfill sites, complexity of regulatory requirements. Toronto has a concern for the use of these terms – do not reflect the anticipated length of this process.

York Region Response: The Region acknowledges the unique nature and sensitivity of the KVL site and the complexity of the regulatory requirements associated with the site. The Region asks for the City's cooperation to obtain any required ECA amendments to allow the Teston Road project to proceed. The approach and timelines can be discussed further during the detail design stage of the project.

- No official agreements or information sharing requests or memorandum of understanding has been offered by the proponent.

York Region Response: The Region agrees to add a commitment to the EA Report to develop a memorandum of understanding, or other agreement, with the City of Toronto regarding anticipated collaboration requirements during the detail design, construction and operation of the Teston Road project.

3. Comment/Response 70 references a revised stormwater report. We do not have a copy of that in the list of revised reports.

- Could York please send us revised Appendix K – Stormwater.

York Region Response: The Region will provide the City with a copy of the revised Appendix K – Stormwater Report.

4. On page 321 of the revised Draft CEA it is stated *"York Region also commits to clearly delineating the landfill site boundaries, establishing ownership, easements, and land use covenants; and, to preparing a series of to scale plan and cross-section drawings to reconcile and confirm project boundaries, also showing property lines, topographical features, above grade and below grade landfill infrastructure. York Region will work with the landfill owners / operators and MECP to ensure that appropriate monitoring, operating, maintenance access is provided to the landfill infrastructure in the vicinity of the transportation corridor."*

- York Region is committing to follow up work as described above, as part of future studies. No timeline or design phase was offered with the above statement.

York Region Response: The Region's 10 Year Capital Plan includes the commencement of the construction of the Teston Road project between Keele Street and Dufferin Street by 2030 with the detail design phase to be completed prior to 2030 and following the anticipated approval by MECP of the EA Report. The above-noted activities under Item 4. are anticipated to take place during the detail design phase of the project.

- The outcome of these future studies (such as the impact of altering neighbouring property infrastructure) will need to be reviewed by Toronto. For example, any impacts to the operation of the Vaughan flare facility could impact Toronto – how will York Region ensure KVL is not impacted.

York Region Response: The Region agrees to engage with the City of Toronto throughout the detail design process and to provide the City of Toronto opportunities to review / comment on potential impacts / alterations to neighbouring property infrastructure. At this time the Region does not anticipate significant impacts / alterations to the Vaughan Landfill Flare Facility although a review will be required at detail design of its proximity to the proposed Teston Road and north side multi-use pathway.

Gas and access

5. With respect to comment responses in Section B(c) of York Region of August 12, 2025, the City of Toronto requests to be consulted on during the design process on conflicts that may arise with the gas probes along the north fence line. Any relocation of gas probes will require MECP approval prior to the design being finalized. This process will require the concurrence of the City of Toronto prior to the design being shared with the MECP for approval. The Teston Road Project is expected by the City of Toronto to prepare and provide all documents required to demonstrate the need for the change in the gas probe(s) location(s).

York Region Response: The Region agrees to consult with City of Toronto during detail design on potential conflicts with gas probes along the north KVL fence line and to provide documentation demonstrating any need for changes. At this time the Region anticipates some, but generally limited, impacts as noted in the updated EA Report including:

- 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.
6. With respect to comment responses in Section C(a) of York Region of August 12, 2025, the response to first bullet remains ambiguous. The EA Project has not specifically identified the rationale for the current closure of Teston Road. The City of Toronto has a continued need for access to the currently closed portion of Teston Road to access the Teston Road Purge Well System for maintenance. Access to the Teston Road Purge Well System will need to be maintained in the design to accommodate the safe ingress and egress, including turnaround, of Class D vehicles and associated heavy equipment which is required on a regular basis for purge well system maintenance.

York Region Response: The Region acknowledges the City's continued need for access to the currently closed portion of Teston Road to access the Teston Road Purge Well System (TPWS) for maintenance. The Region commits to accommodating safe and appropriately designed ingress, egress and turnaround of Class D vehicles to the TPWS access road along the north side of the proposed Teston Road.

7. With respect to comment responses in Section C(e) of York Region of August 12, 2025 while the revised documents acknowledge the likelihood for landfill gas to be present beneath the roadway, there is insufficient information on the proposed mitigation measures proposed for the road. There is insufficient information to understand if the mitigation measures proposed would mitigate landfill gas migration from the roadway and the Vaughan Landfill to the Keele Valley Landfill. The current Vaughan landfill gas control system is an active landfill gas system and is located within a limited area of the south boundary of the Vaughan Landfill. The reference in the

Soil, Waste and Landfill Gas Report to a passive system as the proposed migration measure for the EA Project is incomplete as it does not acknowledge the need for active landfill gas collection from the Vaughan Landfill and the development of the road appears to impact the current Vaughan landfill gas control system, which again is only for a portion of the Vaughan Landfill. It is again noted that any discharge of landfill gas through a control system (e.g., active or passive) requires regulatory approval (i.e., ECA from MECP).

York Region Response: The Region acknowledges the continued need for active landfill gas collection from the Vaughan Landfill and that the Teston Road project will likely have impacts to a portion of the landfill gas control system which will need to be addressed through the Teston Road detail design process. It has been noted in the EA Report that any discharge of landfill gas through a control system (e.g., active or passive) requires regulatory approval (i.e., ECA from MECP).

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 pleased to meet with the City of Toronto at any time to discuss and respond to any comments and concerns.

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
The Regional Municipality of York | 17250 Yonge Street | Newmarket, ON L3Y 6Z1
O: 1-877-464-9675 ext. 76046 | C: 905-716-5632 | Billy.Cheung@york.ca

CC Emails to:

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Jennifer Gill, Manager, Solid Waste, City of Vaughan; Jennifer.Gill@vaughan.ca
Tracy Meldrum, Lead, Senior Hydrogeologist, WSP; Tracy.Meldrum@wsp.com

APPENDIX E-2 – City of Vaughan

Harkness, Andrew

From: Hilda Esedebe <Hilda.Esedebe@vaughan.ca>
Sent: Sunday, December 22, 2024 4:11 PM
To: John, Praveen; Cheung, Billy
Cc: MH-TestonRoadAreaIEA; Christopher Tam; Walid Omar; Andrew Harkness; Nick Crockford; Martin Blouin; Victoria Cheng
Subject: Notice of Public Review - Teston Road Area Improvements IEA - City of Vaughan Comments
Attachments: Teston IEA-ESR-City of Vaughan Comment-Dec 22, 2024.doc

You don't often get email from hilda.esedebe@vaughan.ca. [Learn why this is important](#)

Good afternoon Billy/Praveen,

I hope this email finds you well.

Please see attached comments from City of Vaughan staff on the Environmental Study Report for the above mentioned York Region project. The expectation is for these comments to inform the upcoming detailed design assignment.

Please note, the attached file includes embedded PDFs for convenience.

If there are any questions or concerns, please contact the undersigned.

The City looks forward to our continued collaboration on this project.

Best Regards and Happy Holidays,

Hilda Esedebe, P.Eng., MBA, M.Sc.
**Program Manager, Transportation Engineering
Infrastructure Planning and Corporate Asset Management**
905-832-8585, ext. 8484 | hilda.esedebe@vaughan.ca

City of Vaughan | Infrastructure Development
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From: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Sent: Friday, November 8, 2024 11:42 AM
To: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Subject: [External] Notice of Public Review - Teston Road Area Improvements IEA

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Dear Sir/Madam,

On behalf of the Regional Municipality of York, please see attached notice for the Teston Road Area Transportation Improvements Individual Environmental Assessment in the City of Vaughan.

Please provide your review of the draft Individual Environmental Assessment Report by **December 22, 2024**. Comments can be provided to:

York Region Transportation, Public Works

Phone: 1-877-464-9675 ext. 75000

TTY: 1-866-512-6228

Email: transportation@york.ca

To better assist you, please quote Teston Road IEA in your inquiry.

Thank you,

Teston Road IEA Study Team

This e-mail, including any attachment(s), may be confidential and is intended solely for the attention and information of the named addressee(s). If you are not the intended recipient or have received this message in error, please notify me immediately by return e-mail and permanently delete the original transmission from your computer, including any attachment(s). Any unauthorized distribution, disclosure or copying of this message and attachment(s) by anyone other than the recipient is strictly prohibited.

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Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.

Development Services and Environmental Engineering

The following documents have been reviewed related to this IEA:

- Appendix G: Noise Report
- Appendix H: Air Report
- Appendix M: Contamination Overview Study
- Appendix N.1: Phase 1 ESA Property 1-8 Reports (7 total reports, Properties 1 and 2 were combined into Report 1)
- Appendix O: Soil Investigation Report

Noise Report:

1. The report has identified several receptors with material increases in noise. No mitigation measures have been proposed for Receptors 4, 6 and 26 due to the presence of driveways which need to be maintained; however, Receptors 7 to 9, 18 and 19 also have a "significant change in noise levels" as modeled. The report notes two separate conclusions on this item: "below 60 dBA, defer decision **until detailed design in the future prior to construction**" and "sound levels are still predicted to be below 60 dBA and therefore mitigation should be deferred **until levels are above 60 dBA**". It is reasonable to defer until detailed design, but mitigation measures should be considered where feasible in the areas with significant increases rather than waiting "until levels are above 60 dBA."

Air Quality Report: No comments.

COS:

The COS report is quite extensive, covering lands extending from Major Mackenzie to Kirby and from Bathurst to Highway 400, well beyond the boundaries of the corridor being assessed.

Based on the review completed, a total of 10 Areas of Potential Environmental Concern (APECs) were identified. Of these 10, 4 APECs were proximate to the Teston Road corridor between Keele Street and Bathurst Street (Sections 1 to 4 of the design):

- APEC 1, the historical landfill operations;
- APEC 2, the industrial park west of the Keele Valley Landfill;
- APEC 3, the Metrolinx Barrie corridor; and
- APEC 10, the intersection of Teston Road and Bathurst Street.

All of the other APECs are located over 1 km from the corridor.

One comment with respect to the COS:

2. It is noted that APEC 10 includes the dry-cleaning facility located at the northeast corner of this intersection (10815 Bathurst Street) but does not include the gasoline service station located at the southwest corner of this intersection (10700 Bathurst Street), despite this facility being identified as having a "high" risk level in Table 1 of the report.

Regardless, the lands in the vicinity of APEC 10 are not part of any of the proposed property acquisitions, such that this may not be a material data gap, but should be addressed.

Phase I ESA:

Phase I ESA reports have been completed for all of the potential acquisition parcels

- Report 1, Properties 1 & 2: Adjoining parcels west of Keele Street, North of Teston Road.
- Report 2, Property 3: Teston Road north ROW, south of 2190 Teston Road.
- Report 3, Property 4: Teston Road north ROW, south of Vaughan Landfill.
- Report 4, Property 5: Teston Road south ROW, north of KVLFF.
- Report 5, Property 6: Ravine Lands north ROW
- Report 6, Property 7: Ravine Lands south ROW
- Report 7, Property 8: Teston Road south ROW, north of 10500 Dufferin Street.

Based on these reports, additional investigation has been recommended for Properties 1&2 (fuel spill and unknown fill quality), Property 4 (landfill activities and unknown fill quality), Property 5 (landfill activities and unknown fill quality), and Property 7 (fuel spills). The reports identify additional Potentially Contaminating Activities (PCAs) within their assessments; however, these are discounted as concerns based on distance, assumed groundwater gradient and/or other supplementary information provided.

Two comments with respect to these reports:

3. With respect to Report 2 for Property 3, this study was completed in 2023 and did not identify any potential environmental concerns requiring further assessment. However, the Soil Investigation Report completed for this corridor, dated April 8, 2024 (discussed further below) identified soil exceedances of Cobalt and Nickel within approximately 30 m of the Property 3 boundaries. Given these new findings, the consultant is requested to review and confirm their previous conclusions as to whether further assessment is recommended.
4. With respect to Report 3 for Property 4, previous subsurface investigations are summarized which indicate groundwater exceedances to the applicable Site Condition Standards. In each case, it is noted that these wells are over 100 m from the Phase One Property. The consultant is requested to confirm whether there are any groundwater samples between the exceedances and the Phase One Property which serve as delineation samples.

No other comments are made with respect to the other individual Phase One ESA reports.

Soil Investigation Report:

The SIR included a corridor-wide sampling program, including 4 environmental-specific boreholes, 3 dual-purpose boreholes for foundation and environmental study, and 11 dual-purpose boreholes for pavement and environmental study.

Overall, this study serves as a reasonable baseline for the corridor, and MH has outlined further work/next steps in their Conclusions and Recommendations. In addition to the next steps proposed by MH, we have the following additional comments:

5. As mentioned in my comment for the COS above, it is noted that there is a gas station adjacent to the east extent of the study area. The closest borehole to the tank nest at this location was 75 m northwest of the nest, in a cross-gradient location. It is requested that as part of further assessments completed in the future that this potentially contaminating activity be investigated. It is also noted that as based on the drawings provided, a watercourse runs beneath the intersection of Teston Road and Bathurst Street, such that sampling may need to be compared to Table 9 rather than Table 3 at that future test location.
6. Section 3.4 notes that Table 3 Standards were selected in part because "the site and surrounding lands are serviced by a municipal drinking water supply which is not supplied by the local groundwater". However, Section 3.6 notes "The quality of soil to be imported in all other areas shall meet MECP's Table 2.1 Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition (Table 2.1 ESQS) or Table 3.1 Full Depth Excess Soil Quality Standards in a Non-Potable Ground Water Condition (Table 3.1 ESQS), depending on the presence or absence of potable groundwater wells within the Study Area." If this has not been determined, should Section 3.4 reference Table 2 instead? It does not appear that this will affect the results to-date as the only location with an exceedance also exceeded Table 3, but this should be clarified for further investigations.
7. This study is provided as a draft; a final copy is requested. It is also noted that the laboratory certificates of analysis attached to this are unsigned with blank signature fields. Signed copies should be included with the final report.

Forestry Operations

Forestry Staff have reviewed the Arborist Report and Tree Inventory, Preservation & Removals Plan of the proposed development concept for the above-mentioned site, and provide the following comments:

General

1. Forestry recommends York Region develops a dedicated communications plan for forestry issues related to this project. Considerations for the communications plan should include:
 - Community stakeholder, Ward Councillor, and Regional Councillor engagement
 - Notice provided to Service Vaughan team on how to best direct citizen inquiries to York Region
 - Post tree removal messaging developed for consistent responses to citizen inquiries and possible inclusion as CRM Knowledge Article for Service Vaughan

2. In the tree inventory clearly state if any private trees are infect owned by the City of Vaughan.
3. In the tree inventory, include a column that shows the percentage of encroachment into the minimum tree protection zone (TPZ) that will be required to facilitate the proposed work for the privately owned trees marked for injury
4. City of Vaughan Forestry will not be assigning a representative to monitor the root pruning that may occur; however, an ISA certified arborist is required to be on-site while this work is happening. While we may inspect the site at any point, it will be York Region's responsibility to hire and assign an arborist to be present at all times while roots are being pruned.
5. Forestry will not require York region to obtain a tree removal permit but will require compensation for privately owned/city owned tree removals according to the ratio below:
 - 0-30cm DBH – 1 replacement required
 - 31-40cm DBH – 2 replacements required
 - 41-50cm DBH – 3 replacements required
 - 51+cm DBH – 4 Replacements required
6. It is York Regions responsibility to obtain permission from the private tree owner prior to tree removal.

Tree Protection Requirements (Hoarding for private and City of Vaughan trees)

7. Tree Protection Fencing is to be installed to minimize the impact on the trees (over 20cm DBH for Private and all City owned trees) to be preserved prior demolition/construction and is to remain until the construction is completed as per By-Law 052-2018.
8. MLA 107A or ULA 110A Heavy Duty Tree protection fencing (plywood) is to be installed prior to construction and is to remain until construction is completed, as per By-Law 052-2018.
9. MLA 107B or ULA 110B Light Duty Tree protection fencing (Snow Fence) may only be used where traffic sight lines will be affected within the road allowance, as per By-Law 052-2018.
10. Tree protection shall be installed as outlined in the arborist report prior to the commencement of any construction/demolition activities.
11. The tree protection barriers shall be installed at their approved location and shall be maintained in their original location and condition until all construction activities within the site have ceased and all equipment is removed from the site. No equipment or material storage, flushing of fuel or washing of equipment is allowed within the TPZ. Any works within the TPZ area to be performed or supervised by a Certified Arborist.

12. Applicant shall notify Vaughan Forestry once Tree Protection (Hoarding) has been installed, to allow Vaughan Forestry to inspect and approve according to By-law 052-2018 and/or in accordance with the City of Vaughan's Tree Protection Protocol (2018).

Infrastructure Planning and Engineering - Servicing

Please refer to attached maps. In summary, there is no wastewater servicing identified in Integrated Urban Water Master Plan (IUWP) from Keele St to Bathurst St along Teston Rd. For the water system, a 400mm watermain is planned before 2051 from Rodinea Rd to Dufferin St.

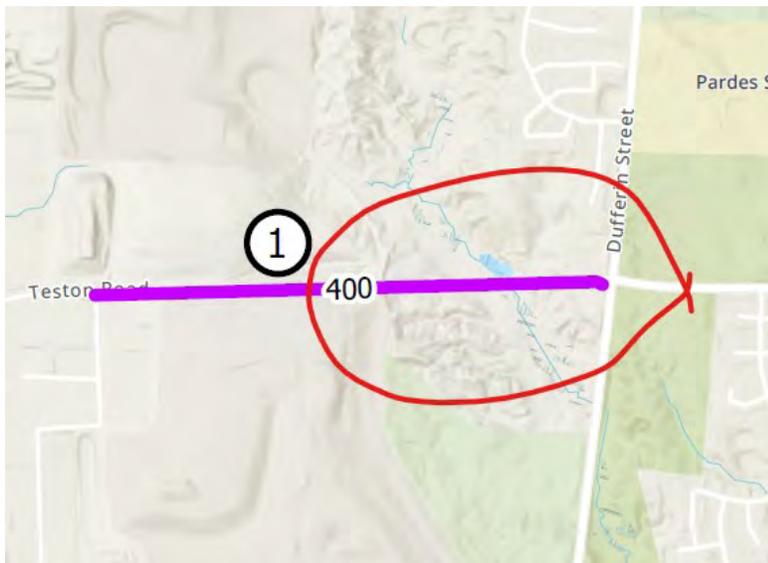


wastewater.pdf



water.pdf

Granted, the Region plans to build a bridge crossing over the East Don River. The IUWP solution is a high-level masterplan, and a feasibility assessment has not yet been conducted. Could the Region explore the possibility of incorporating the watermain design into the Teston Road detailed design process? The City is willing to cover the additional scope of work for the watermain.



North Maple Regional Park – Parks Planning and Infrastructure Development

Detailed comments developed with the consultant (O2) have been attached below.



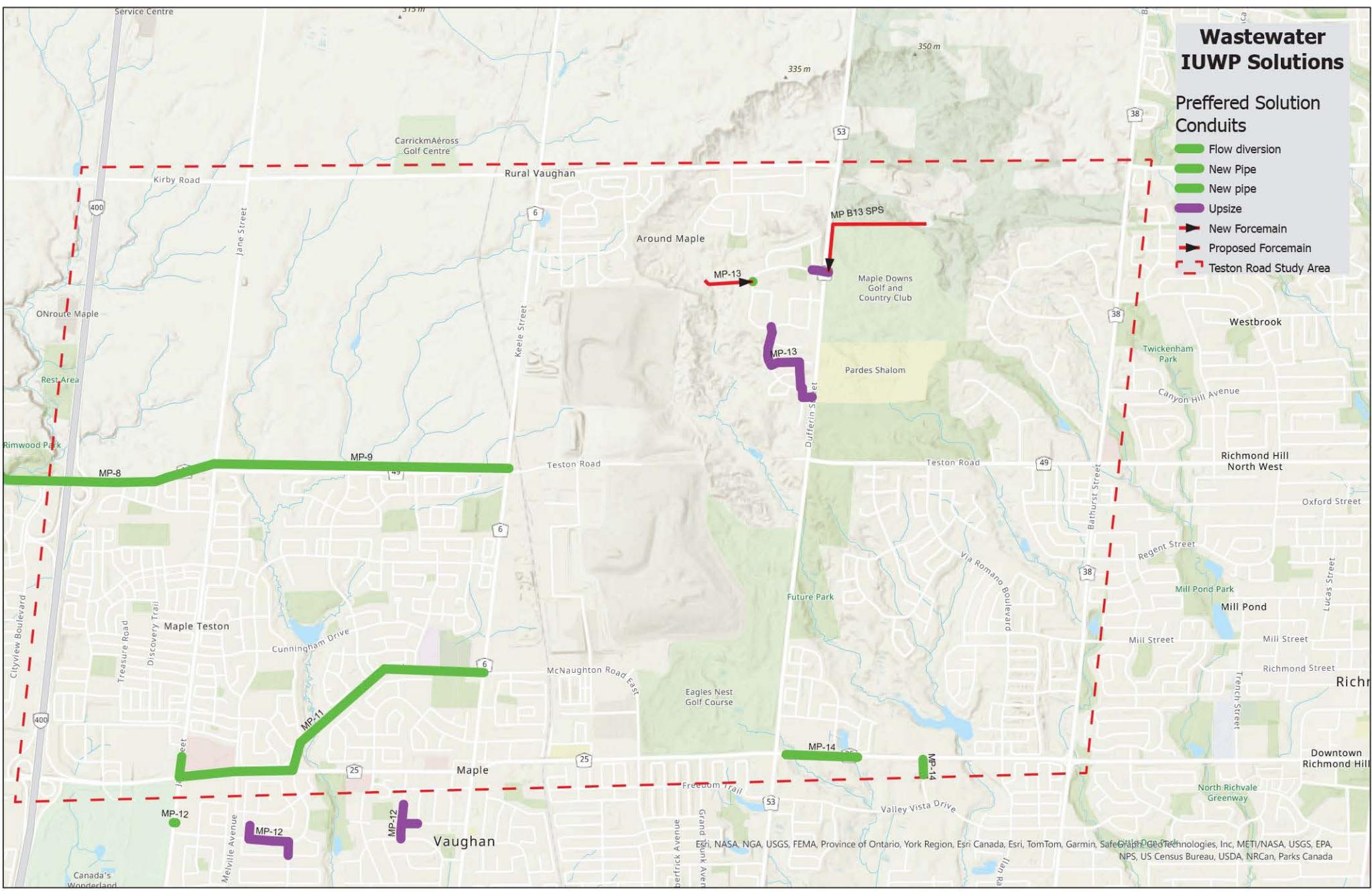
O2_NMRP_Teston 2024-12-16 NMRP
Rd_Memo_City Review Teston Rd Options.pdf



Wastewater IUIWP Solutions

Preferred Solution Conduits

- █ Flow diversion
- █ New Pipe
- █ New pipe
- █ Upsize
- ▶ New Forcemain
- ▶ Proposed Forcemain
- - - Teston Road Study Area



Water IUWP Solutions

Vaughan:
Interconnection /
Pressure Control

Timing

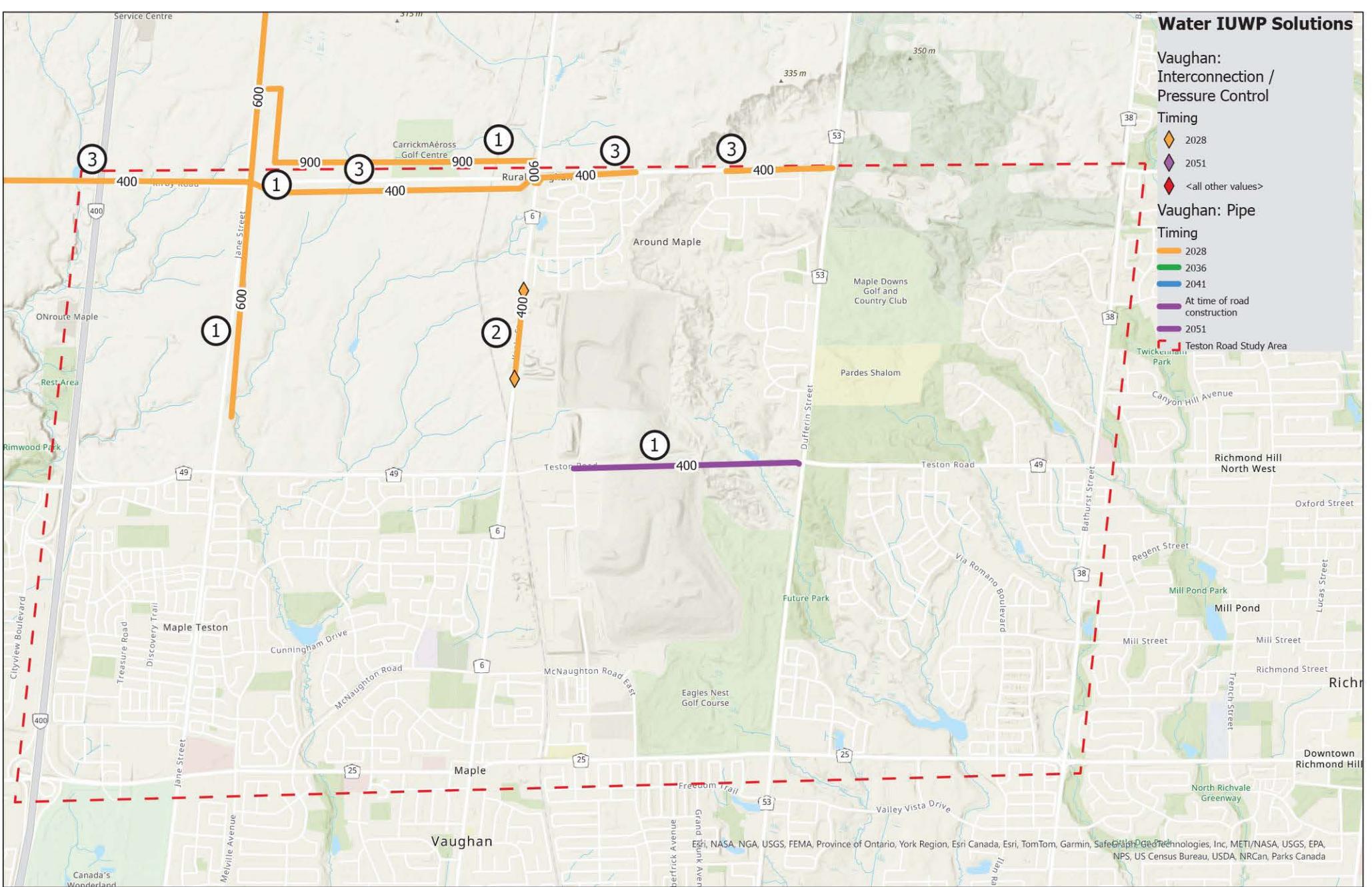
- ◆ 2028
- ◆ 2051
- ◆ <all other values>

Vaughan: Pipe

Timing

- 2028
- 2036
- 2041
- At time of road construction
- 2051

Teston Road Study Area



Memo: Teston Road preliminary design considerations and integration with North Maple Regional Park (NMRP)

To: Jennifer Cappola-Logullo, Jennifer.Logullo@vaughan.ca
From: Matt Williams, Nick Onody (O2)
CC: The Regional Municipality of York – Transportation Services
Date: 2024-12-15

Re: Teston Road - Comments on the preferred design alternative and Integration with NMRP

This memo summarizes the initial comments and considerations for the Teston Road Open House #4 Material (November 1, 2023), which presents the preferred design of the Teston Road IEA Study. O2 has been requested by the City of Vaughan to provide comments to facilitate the next detailed design phase of the Teston Rd project, particularly areas that interface with North Maple Regional Park (NMRP), between Keele Street and Dufferin Street.

We recognize the considerable effort the proposed concept design made in addressing complex site constraints while navigating the unknowns of future retrofits. O2's comments below reflect the desired ultimate condition that aims to integrate best practice and innovative solutions, with a *park-first* approach to create a public realm for NMRP that aligns with its vision of becoming a world-class destination.

The Council approved vision for the park is to develop NMRP into an outstanding destination for sports, recreation, and culture. At the heart of this vision is a commitment to fully immerse visitors in nature, seamlessly blending park amenities and roadways with the natural environment to create a truly integrated experience. While the proposed four-lane road extension improves connectivity, it creates a north-south divide within the park. The NMRP Master Plan (NMRPMP) seeks to leverage the road extension work to improve access and connectivity as well as the environmental sustainability and imageability of the park. Along Teston Rd, this entails pedestrian and cyclist crossings, integration of transit service, green infrastructure, iconic gateways, and accommodating wildlife corridors. By considering these aspects early in the design process, we aim to preserve and enhance the regional park's role as a vital space for both recreation and ecological preservation.

The summary below captures O2's main notes for the *ultimate future condition* for each segment of Teston Rd to protect for future retrofits. Also included in the memo is **Appendix A – NMRP Teston Rd** - a brief containing supplementary precedents and considerations for the Teston Rd schematic plan.

Summary of Next Steps

- **Coordination:** Coordinate an internal workshop with the Teston Rd IEA team to discuss recommendations
- **Park Access:** Accommodate for future public access to NMRP and identify active transportation connections
- **Safe Crossings:** Determine type and number of crossings over Teston Rd (at grade, elevated, etc.), the constructability and economic feasibility of a land bridge
- **Landscape Buffers:** Create multi-functional landscape buffers that offer aesthetic opportunities and stormwater management, and determine where stormwater collection/treatment is feasible along Teston Rd
- **Parking:** Identify proposed parking areas off Teston Rd as well as lay-by parking areas.
- **Servicing and Utilities:** Further understanding of anticipated utility locations along Teston Rd, depths and required setbacks, and the possibility to bury utilities instead of overhead power lines as shown in the IEA cross section
- **Funding:** Explore additional funding sources, grants, cost-sharing opportunities for this project and associated ecological infrastructure improvements

1.0 Design Considerations for the Teston Rd and NMRP Interface

To achieve a balance between transportation improvements and park enhancements, the following design elements should be considered:

1. Unified and Distinctive Public Realm

- Treed Boulevard Design: Enhance the treed canopy along the road wherever possible to provide shade and visual interest and vegetative buffer from the road. Consider a double-row (along the north side) tree alley where possible.
- Cohesive Landscape Design: Incorporate native planting and NMRP material palette for proposed site furnishings, lighting standards along Teston Rd.
- Public Art, Wayfinding and Interpretive Signage: Consider optimal location for public art/gateway features as well as interpretive signage that celebrate the site's natural and cultural heritage and ecological restoration efforts.

2. Accessibility and Seamless Mobility across the Park

- Active Transportation Integration: Clearly marked, dedicated pedestrian and bike lanes on north and south side of Teston Rd.
- Enhanced Access Points and Gateways: create bold and inviting gateways to NMRP from east (towards the Headwaters district) and from the west (towards the Pongside district).
- Safe Pedestrian and Cyclist Crossings: Well-marked pedestrian and cyclist crossings at regular intervals, with potentially traffic calming measures to reduce speed at higher-conflict areas. Consider overpasses or underpasses for pedestrians and cyclists to maintain continuous walkways and bike lanes that connect key areas within the park, allowing uninterrupted movement.

3. Wildlife Corridors / Wildlife-Friendly Road Design

- Wildlife Crossings: Overpasses or underpasses for wildlife to maintain ecological corridors.
- Ecological plantings: Native planting and habitat restoration along the road's edges to enhance the park's ecological functions. Leverage offsetting plans that may be required for compensation for loss of habitat if there are species at risk. Potential to include concurrent project of tall-grass prairie restoration concurrently with the road extension or potential land bridge work.

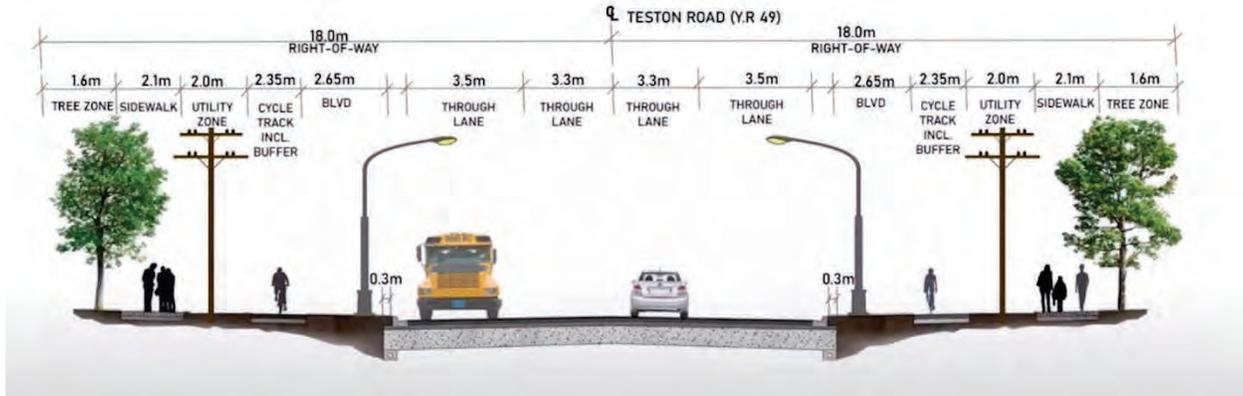
4. Leading with Resilience and Sustainability

- Stormwater management: Where feasible, integrate bioswales and vegetated buffers (understanding bioswales within landfills not acceptable)
- Enhanced forests / nodal plantings: Tree plantings and native species restoration along the road to improve the visual experience and provide habitat.
- Energy-efficient lighting: Consider alternative energy lighting such as solar-powered or energy efficient lighting systems.

5. Parking and Transit Facilities

- Proposed Parking: Off-road parking areas that minimize disruption to the park landscape.
- Future Bus Stops: Integration of public transit options to reduce traffic congestion and provide alternative transportation to the park.

2.0 Comments on the Preferred Design of the Teston Rd IEA Study

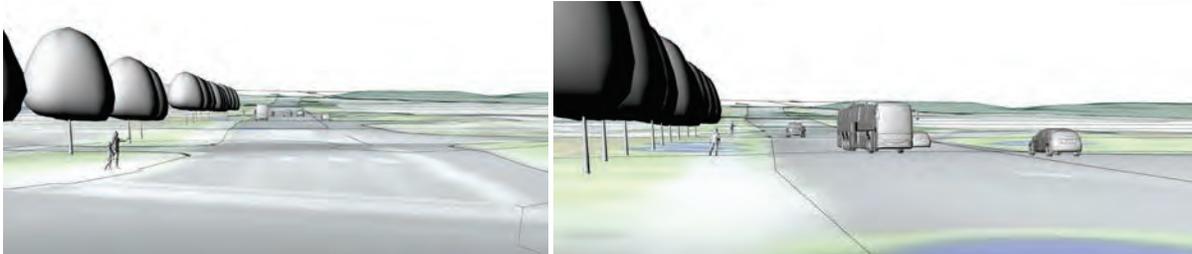


Alignment section	Preferred design alternative
Section 1: Keele Street to Rodinea Road (GO Rail Crossing)	<ul style="list-style-type: none"> Widened four-lane roadway At-grade GO Rail Crossing with improved Teston Road alignment (shift to north) Long-term property protection for GO Rail/Teston Road grade separation
Section 2: Rodinea Road to valley (Landfill Area)	<ul style="list-style-type: none"> New constrained four-lane cross section with property protection for future full width cross section
Section 3: Valley crossing	<ul style="list-style-type: none"> New constrained four-lane cross section with property protection for future full width cross section Single-span bridge
Section 4: Dufferin Street to Bathurst Street	<ul style="list-style-type: none"> Widen equally on both sides to four-lanes

Above Images: Teston Rd IEA Open House #4 Materials (Nov 2023)

2.1 General Comments

- Given that the interim conditions shown below will be in place for an extended period, it should be enhanced to create a more safe and enjoyable experience for pedestrians and cyclists.



- What is the rationale for a 4-lane road in year 49? See precedent of Central Park NY, where the 36m ROW of vehicular lanes are reduced to promote active transportation.



- Progress the design of the desired future build-out which includes the MUP or sidewalk and cycle track on the south side of Teston Rd.

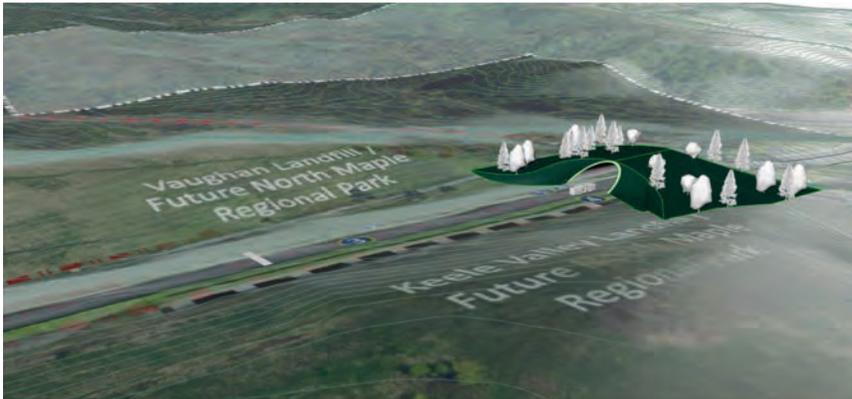
- Further understanding of the anticipated utility locations along Teston Rd, depths and required setbacks, as well as need for suggested overhead utilities. (eg. Are overhead powerlines necessary or can they be buried?)
- Progress ultimate road cross section to include more buffer zone off the face of the curb to accommodate trees along the street. The boulevard buffer is currently shown at 2.65m. Per York Region Road Design standards, minimum boulevard width to accommodate street tree planting is 3.4 metres, measured from back of curb to inside edge of active transportation facility, inclusive of maintenance/ splash strip.
- Avoid disturbance of trees during future retrofits. Interim tree zone may conflict with the proposed future utility zone.
- Consider additional parking along Teston Rd (exploring replacing one or two through lanes) as lay-bys due to the constraints of the landfill and topography within the ravine area. In addition, explore dispersed off-site parking opportunities.

2.2 Section 1: Keele Street to Rodinea Rd

- Understanding the need for the interim condition at Keele St to be 6-lane wide. Consider a center median to enhance treed boulevard at park entry.
- Identify future pedestrian/active transport facilities to determine optimal locations for crossings. (**See suggested locations in Appendix A**)
- Verify potential for transit stops within this section of Teston Rd (**See suggested locations in Appendix A**)
- NMRPMP to identify optimal locations for future parking areas to future-proof areas for curb cuts and entries.
- York Region to progress design of the safe GO Rail Crossing for O2 to incorporate into the NMRPMP.

2.3 Section 2: Rodinea Rd to Valley (Landfill Area)

- NMRPMP to progress and identify potential overhead pedestrian/cyclist crossings on the western side and identify potential land bridge connection on the eastern side of this section.



2.4 Section 3: Valley Crossing

- NMRPMP to incorporate York Region's design of storage/treatment facilities under the roadway and outlets to stream. This aligns with the NMRP master plan's goal of establishing a monitoring station at the easternmost corner to evaluate the effectiveness of water treatment efforts before it is discharged into the river.

3.0 Precedents of Large-scale Park Roads

3.1 Treed Boulevards: Extending the Park to Teston Rd



Left: Tree-lined Multi-use path, Coal Harbour, Vancouver BC



Right: Green Street - bioswale in boulevard, Downsview Park, Toronto ON



Above: Green Streets Clean Water Plan, Department of Public Works, County of San Diego

3.2 Land Bridge: Kinder Land Bridge and Prairie Project at Memorial Park, Houston Texas

The project features a land bridge that spans Memorial Dr, unifying a divided park while improving access for pedestrians, cyclists, and wildlife. It also includes a native prairie to support local wildlife and biodiversity.



Above Images: Kinder Land Bridge at Memorial Park, Houston Texas

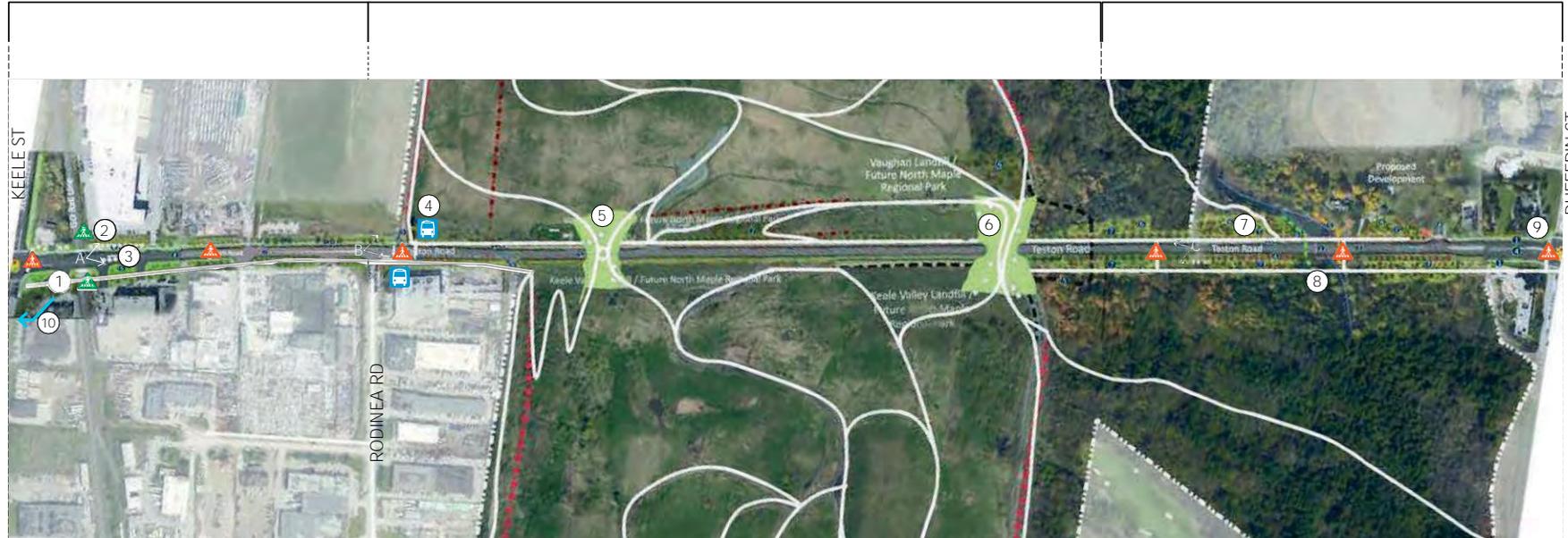
Teston Rd Extension - NMRP Integration Comments #1

ULTIMATE FUTURE CONDITION

Section 1: Keele St to Rodinea Rd (GO Crossing)

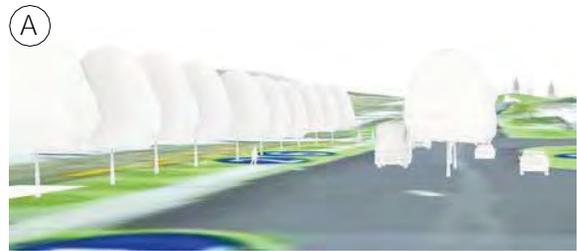
Section 2: Rodinea Rd to Valley Crossing | BbMt` ` oObI

Section 3: Valley Crossing

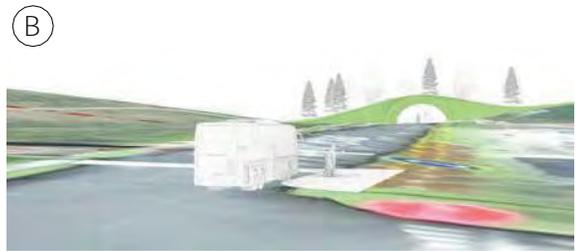


Features

- At-grade crossing
- At-grade GO rail crossing (with safety measures)
- Potential Parking Area
- Potential Future Bus Stop
- ① Progress the design of the desired future build-out which includes the MUP or sidewalk and cycle track on the south side of Teston Rd.
- ② York Region to progress design of the safe GO Rail Crossing for O2 to incorporate into the NMRPMP.
- ③ Consider a center median to enhance treed boulevard at park entry.
- ④ Potential for transit stops within this section of Teston Rd (TBD)
- ⑤ Potential location of overhead crossing and AT pathway connections. Overpass or land bridge crossing to be confirmed based on offset distance required from adjacent landfill infrastructure. Lanes may need to be reduced to accommodate bridge abutments.
- ⑥ Potential location of overhead crossing and AT pathway connections. Feasibility of land-bridge to be confirmed.
- ⑦ NMRPMP to incorporate York Region's design of storage/treatment facilities under the roadway and outlets to stream.
- ⑧ NMRPMP to incorporate York Region's design of bridge, wildlife passage and connect the lower trail to the Maple Nature Reserve trails to the east and to NMRP trails to the Headwaters district within the park.
- ⑨ East gateway into the park.
- ⑩ IEA proposes stormwater low towards retention area southwest of Teston Rd and Keele St via ditching culverts.



Explore creative solutions to seamlessly extend the park into Teston Road through tree-lined boulevards, lush planting zones, and vibrant active transportation pathways on both sides of the road. Clear wayinding and distinct park connections will help guide visitors to points of interests within the park.



The bridges serve as both parkway wayinding landmarks and gateway markers at the west and east entrances. The proposed bus stop is situated at the trail head that leads up to the bridge overlooks and the plateaus.



The eastern bridge is a key connector for the Vaughan Supertrail, linking the Headwaters district within the park to City Hall and the VMC. The landscaping of the landbridge can draw inspiration from nearby tallgrass prairie restoration projects, as well as the woodland and riverine forests that surround the bridge.

Teston Rd Extension - NMRP Integration Comments #1

Demonstration Plan A: Nature-focused with land bridge crossings



1 Kinder Land Bridge at Memorial Park, Houston Texas



2 Tree-lined Multi-use path, Coal Harbour, Vancouver BC

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary		
IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 04, 2025)
City of Vaughan (December 22, 2024)		
<u>Development – Transportation Engineering (TE)</u>		
1. Appendix B – Design Drawings	<p>Questions about the design drawing (shown below) in Appendix B page 8 of 33.</p> <p>There is a retaining wall (1.4m high within the typical sight triangle area) on the northeast corner of Teston/Future Street A, located at 1500 Teston Road, according to the profile drawing from Teston Sands' Feb 2024 Engineering Submission (attachment 1). Is the retaining wall being considered? According to the profile drawing, the sidewalk on the west side of Street A will be 1.5m wide. TE's comments (attachment 2) asked the developer to relocate the sidewalk to the east side to increase the visibility of pedestrians. However, the sidewalk/MUP shown in Appendix B seems wider (~3m). Has this been confirmed with the developer? and how does it connect back to the 1.5m wide sidewalk? Not having received any subsequent submissions, we're not sure whether there will be changes to the engineering submission drawings last reviewed. Also, the MUP on the northeast corner stops at the dashed magenta line, which does not cover the elephant fleet crosswalk.</p>	<p>Designs have been shared with the developer of 1600 Teston (Teston Sands) and continued coordination will occur during detail design. Our design reflects the most recent design shared between the two design teams. As the Teston Road design is only preliminary, it is representative and will require refinements in the future.</p>
<u>Development Services and Environmental Engineering</u>		
2. Appendix G: Noise Report	<p>The report has identified several receptors with material increases in noise. No mitigation measures have been proposed for Receptors 4, 6 and 26 due to the presence of driveways which need to be maintained; however, Receptors 7 to 9, 18 and 19 also have a "significant change in noise levels" as modeled. The report notes two separate conclusions on this item: "below 60 dBA, defer decision until detailed design in the future prior to construction" and "sound levels are still predicted to be below 60 dBA and therefore mitigation should be deferred until levels are above 60 dBA". It is reasonable to defer until detailed design, but mitigation measures should be considered where feasible in the areas with significant increases rather than waiting "until levels are above 60 dBA."</p>	<p>Changes have been made to the Noise Report to reflect the comments provided. Noise mitigation should be deferred to detail design when the "future build" sound levels are below 60 dBA.</p> <p>The York Region policy and the need for noise mitigation is based upon sound levels being in excess of 60 dBA and mitigation can be deferred until sound levels reach that point. By the time this project proceeds to detail design the traffic volumes may have changed. In addition, there should be a revised noise analysis following 90% design and the vertical and horizontal alignment of the roadway could change.</p> <p>A developer-built barrier is already specified for Receptors 7 to 20.</p>
3. Appendix M: Contamination Overview Study	<p>The COS report is quite extensive, covering lands extending from Major Mackenzie to Kirby and from Bathurst to Highway 400, well beyond the boundaries of the corridor being assessed.</p> <p>Based on the review completed, a total of 10 Areas of Potential Environmental Concern (APECs) were identified. Of these 10, 4 APECs were proximate to the Teston Road corridor between Keele Street and Bathurst Street (Sections 1 to 4 of the design):</p> <ul style="list-style-type: none"> • APEC 1, the historical landfill operations; • APEC 2, the industrial park west of the Keele Valley Landfill; • APEC 3, the Metrolinx Barrie corridor; and • APEC 10, the intersection of Teston Road and Bathurst Street. <p>All of the other APECs are located over 1 km from the corridor.</p>	<p>The Contamination Overview Study was revised and the study area brought down to the proposed alignment with a 500 m buffer. APECs were refined accordingly.</p>
4. Appendix M: Contamination Overview Study	<p>It is noted that APEC 10 includes the dry-cleaning facility located at the northeast corner of this intersection (10815 Bathurst Street) but does not include the gasoline service station located at the southwest corner of this intersection (10700 Bathurst Street), despite this facility being identified as having a "high" risk level in Table 1 of the report. Regardless, the lands in the vicinity of APEC 10 are not part of any of the proposed property acquisitions, such that this may not be a material data gap, but should be addressed.</p>	<p>APECs table has been updated to include the gas station.</p>
5. Appendix N: Phase I ESAs	<p>Phase I ESA reports have been completed for all of the potential acquisition parcels</p> <ul style="list-style-type: none"> • Report 1, Properties 1 & 2: Adjoining parcels west of Keele Street, North of Teston Road. • Report 2, Property 3: Teston Road north ROW, south of 2190 Teston Road. • Report 3, Property 4: Teston Road north ROW, south of Vaughan Landfill. • Report 4, Property 5: Teston Road south ROW, north of KVLFF. • Report 5, Property 6: Ravine Lands north ROW • Report 6, Property 7: Ravine Lands south ROW • Report 7, Property 8: Teston Road south ROW, north of 10500 Dufferin Street. 	<p>Comment Noted.</p>

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary		
IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 04, 2025)
	Based on these reports, additional investigation has been recommended for Properties 1&2 (fuel spill and unknown fill quality), Property 4 (landfill activities and unknown fill quality), Property 5 (landfill activities and unknown fill quality), and Property 7 (fuel spills). The reports identify additional Potentially Contaminating Activities (PCAs) within their assessments; however, these are discounted as concerns based on distance, assumed groundwater gradient and/or other supplementary information provided.	
6. Appendix N: Phase I ESAs	With respect to Report 2 for Property 3, this study was completed in 2023 and did not identify any potential environmental concerns requiring further assessment. However, the Soil Investigation Report completed for this corridor, dated April 8, 2024 (discussed further below) identified soil exceedances of Cobalt and Nickel within approximately 30 m of the Property 3 boundaries. Given these new findings, the consultant is requested to review and confirm their previous conclusions as to whether further assessment is recommended.	BH-P5 is closer to the Phase One Property than the MH-BH1 which had the Cobalt and Nickel exceedances. Given this and the fact that the Phase One Property is undisturbed relative to the area around MH-BH1, we are comfortable with our recommendations 'as is'.
7. Appendix N: Phase I ESAs	With respect to Report 3 for Property 4, previous subsurface investigations are summarized which indicate groundwater exceedances to the applicable Site Condition Standards. In each case, it is noted that these wells are over 100 m from the Phase One Property. The consultant is requested to confirm whether there are any groundwater samples between the exceedances and the Phase One Property which serve as delineation samples.	No, there are no wells between OW5/81 and the Phase One Property. We have reviewed our recommendations and have decided not to change them.
8. Appendix O: Soil Investigation Report	The SIR included a corridor-wide sampling program, including 4 environmental-specific boreholes, 3 dual-purpose boreholes for foundation and environmental study, and 11 dual-purpose boreholes for pavement and environmental study. Overall, this study serves as a reasonable baseline for the corridor, and MH has outlined further work/next steps in their Conclusions and Recommendations.	Comment Noted.
9. Appendix O: Soil Investigation Report	As mentioned in my comment for the COS above, it is noted that there is a gas station adjacent to the east extent of the study area. The closest borehole to the tank nest at this location was 75 m northwest of the nest, in a cross-gradient location. It is requested that as part of further assessments completed in the future that this potentially contaminating activity be investigated. It is also noted that as based on the drawings provided, a watercourse runs beneath the intersection of Teston Road and Bathurst Street, such that sampling may need to be compared to Table 9 rather than Table 3 at that future test location.	The gas station is now noted as contributing to the APEC and will therefore be flagged for further investigation. We acknowledge your comment about the watercourse, which we trust will be considered in future assessments.
10. Appendix O: Soil Investigation Report	Section 3.4 notes that Table 3 Standards were selected in part because "the site and surrounding lands are serviced by a municipal drinking water supply which is not supplied by the local groundwater". However, Section 3.6 notes "The quality of soil to be imported in all other areas shall meet MECP's Table 2.1 Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition (Table 2.1 ESQS) or Table 3.1 Full Depth Excess Soil Quality Standards in a Non-Potable Ground Water Condition (Table 3.1 ESQS), depending on the presence or absence of potable groundwater wells within the Study Area." If this has not been determined, should Section 3.4 reference Table 2 instead? It does not appear that this will affect the results to-date as the only location with an exceedance also exceeded Table 3, but this should be clarified for further investigations.	Thank you for pointing out this inconsistency. We note that the hydrogeology report does point out that there may still be users of groundwater in the area. We have changed the assessment standards to Table 2.
11. Appendix O: Soil Investigation Report	This study is provided as a draft; a final copy is requested. It is also noted that the laboratory certificates of analysis attached to this are unsigned with blank signature fields. Signed copies should be included with the final report.	We will do our best to obtain and include the final signed copies of the certificates of analysis.
Forestry Operations		
12. Arborist Report and Tree Inventory, Preservation & Removals Plan	Forestry recommends York Region develops a dedicated communications plan for forestry issues related to this project. Considerations for the communications plan should include: <ul style="list-style-type: none"> • Community stakeholder, Ward Councillor, and Regional Councillor engagement • Notice provided to Service Vaughan team on how to best direct citizen inquiries to York Region • Post tree removal messaging developed for consistent responses to citizen inquiries and possible inclusion as CRM Knowledge Article for Service Vaughan 	York Region will undertake appropriate communication, and consultations with all appropriate stakeholders during detailed design and construction in accordance with existing procedures and protocols.
13. Arborist Report and Tree Inventory, Preservation & Removals Plan	In the tree inventory clearly state if any private trees are owned by the City of Vaughan.	Outside of the city owned properties in the valley, there are approximately 20 trees on City owned lands (primarily on the Vaughan Township landfill) that likely require removal. Within the valley lands, there are approximately 1.8 ha of tree removals (mapping of impacted areas has been provided along with this response). Precise counts for tree removals in these areas will be completed during detailed design.

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary		
IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 04, 2025)
14. Arborist Report and Tree Inventory, Preservation & Removals Plan	In the tree inventory, include a column that shows the percentage of encroachment into the minimum tree protection zone (TPZ) that will be required to facilitate the proposed work for the privately owned trees marked for injury.	As the design is currently on preliminary it would be premature to complete this level of analysis. These details will be provided during detailed design.
15. Arborist Report and Tree Inventory, Preservation & Removals Plan	City of Vaughan Forestry will not be assigning a representative to monitor the root pruning that may occur; however, an ISA certified arborist is required to be on-site while this work is happening. While we may inspect the site at any point, it will be York Region's responsibility to hire and assign an arborist to be present at all times while roots are being pruned.	Comment noted.
16. Arborist Report and Tree Inventory, Preservation & Removals Plan	Forestry will not require York region to obtain a tree removal permit but will require compensation for privately owned/city owned tree removals according to the ratio below: 0-30cm DBH – 1 replacement required 31-40cm DBH – 2 replacements required 41-50cm DBH – 3 replacements required 51+cm DBH – 4 Replacements required	Tree compensation will be addressed as part of the detailed design as the impacts may change as the design is refined. It should be noted that ecosystem compensation recommendations are quantified for permanent loss areas, in accordance with the TRCA's <i>Guideline for Determining Ecosystem Compensation</i> (2023) and are discussed in Section 10.3.2.2 of the report and Appendix E (Natural Science Report). In general, over 12 hectares of compensation are recommended due to the impacts of the project. Further refinements to this recommendation will be made during detailed design.
17. Arborist Report and Tree Inventory, Preservation & Removals Plan	It is York Regions responsibility to obtain permission from the private tree owner prior to tree removal.	York Region will obtain permissions from the private tree owner if or when tree removal is required.
18. Arborist Report and Tree Inventory, Preservation & Removals Plan	Tree Protection Fencing is to be installed to minimize the impact on the trees (over 20cm DBH for Private and all City owned trees) to be preserved prior demolition/construction and is to remain until the construction is completed as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
19. Arborist Report and Tree Inventory, Preservation & Removals Plan	MLA 107A or ULA 110A Heavy Duty Tree protection fencing (plywood) is to be installed prior to construction and is to remain until construction is completed, as per By-Law 052-2018. MLA 107B or ULA 110B Light Duty Tree protection fencing (Snow Fence) may only be used where traffic sight lines will be affected within the road allowance, as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
20. Arborist Report and Tree Inventory, Preservation & Removals Plan	Tree protection shall be installed as outlined in the arborist report prior to the commencement of any construction/demolition activities.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
21. Arborist Report and Tree Inventory, Preservation & Removals Plan	The tree protection barriers shall be installed at their approved location and shall be maintained in their original location and condition until all construction activities within the site have ceased and all equipment is removed from the site. No equipment or material storage, flushing of fuel or washing of equipment is allowed within the TPZ. Any works within the TPZ area to be performed or supervised by a Certified Arborist.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
22. Arborist Report and Tree Inventory, Preservation & Removals Plan	Applicant shall notify Vaughan Forestry once Tree Protection (Hoarding) has been installed, to allow Vaughan Forestry to inspect and approve according to By-law 052-2018 and/or in accordance with the City of Vaughan's Tree Protection Protocol (2018).	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
Infrastructure Planning and Engineering - Servicing		
23. General	Please refer to attached maps. In summary, there is no wastewater servicing identified in Integrated Urban Water Master Plan (IUWP) from Keele St to Bathurst St along Teston Rd. For the water system, a 400mm watermain is planned before 2051 from Rodinea Rd to Dufferin St. Granted, the Region plans to build a bridge crossing over the East Don River. The IUWP solution is a high-level masterplan, and a feasibility assessment has not yet been conducted. Could the Region explore the possibility of incorporating the watermain design into the Teston Road detailed design process? The City is willing to cover the additional scope of work for the watermain.	York Region to provide separate response.
O2 Planning and Design Inc. (on behalf of the City of Vaughan) – North Maple Regional Park Comments		
24. Design Considerations	Unified and Distinctive Public Realm <ul style="list-style-type: none"> Treed Boulevard Design: Enhance the treed canopy along the road wherever possible to provide shade and visual interest and vegetative buffer from the road. Consider a double-row (along the north side) tree allee where possible. 	Integration of the Teston Road right-of-way streetscaping with plans for North Maple Regional Park is an important design consideration for this project. Streetscaping in this area will be

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary		Proponent Response – DRAFT (June 04, 2025)
	<ul style="list-style-type: none"> Cohesive Landscape Design: Incorporate native planting and NMRP material palette for proposed site furnishings, lighting standards along Teston Rd. Public Art, Wayfinding and Interpretive Signage: Consider optimal location for public art/gateway features as well as interpretive signage that celebrate the site's natural and cultural heritage and ecological restoration efforts. 	designed in accordance with York Region's design standards in consultation with the City of Vaughan. Public Realm elements such as vegetation, planting, and site furnishings can be discussed during detailed design.
25.	<p>Accessibility and Seamless Mobility across the Park</p> <ul style="list-style-type: none"> Active Transportation Integration: Clearly marked, dedicated pedestrian and bike lanes on north and south side of Teston Rd. Enhanced Access Points and Gateways: create bold and inviting gateways to NMRP from east (towards the Headwaters district) and from the west (towards the Pondsides district). Safe Pedestrian and Cyclist Crossings: Well-marked pedestrian and cyclist crossings at regular intervals, with potentially traffic calming measures to reduce speed at higher-conflict areas. Consider overpasses or underpasses for pedestrians and cyclists to maintain continuous walkways and bike lanes that connect key areas within the park, allowing uninterrupted movement. 	Given the constraints of existing infrastructure associated with the landfills, dedicated pedestrian and bike lanes are not currently feasible. The ultimate design includes sidewalks and dedicated bike lanes (cycle tracks) on both sides of the roadway while only a north side MUP is proposed under the interim design until such time as the landfill infrastructure is decommissioned.
26.	<p>Wildlife Corridors/Wildlife – Friendly Road Design</p> <ul style="list-style-type: none"> Wildlife Crossings: Overpasses or underpasses for wildlife to maintain ecological corridors. Ecological plantings: Native planting and habitat restoration along the road's edges to enhance the park's ecological functions. Leverage offsetting plans that may be required for compensation for loss of habitat if there are species at risk. Potential to include concurrent project of tall-grass prairie restoration concurrently with the road extension or potential land bridge work. 	Wildlife crossing has been considered and included in the Preliminary Design within the valley portion of the design. Crossing within the landfill limits are not included as part of the Preliminary Design due to infrastructure constraints. Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.
27.	<p>Leading with Resilience and Sustainability</p> <ul style="list-style-type: none"> Stormwater management: Where feasible, integrate bioswales and vegetated buffers (understanding bioswales within landfills not acceptable) Enhanced forests / nodal plantings: Tree plantings and native species restoration along the road to improve the visual experience and provide habitat. Energy-efficient lighting: Consider alternative energy lighting such as solar-powered or energy efficient lighting systems. 	<p>Drainage and stormwater management measures are proposed to accommodate the roadway improvements including construction of a new storm sewer system and extension/relocation of existing culverts. Stormwater management will continue to be evaluated during detailed design.</p> <p>Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.</p>
28.	<p>Parking and Transit Facilities</p> <ul style="list-style-type: none"> Proposed Parking: Off-road parking areas that minimize disruption to the park landscape. <p>Future Bus Stops: Integration of public transit options to reduce traffic congestion and provide alternative transportation to the park.</p>	<p>No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.</p> <p>Integration of transit stops will be addressed during detailed design.</p>
29.	<p>Preferred Design Section 9</p> <p>What is the rationale for a 4-lane road in year 49? See precedent of Central Park NY, where the 36m ROW of vehicular lanes are reduced to promote active transportation.</p>	Traffic lane requirements are determined by modelling future travel demand levels and travel movements in the area to understand the number of vehicle movements through the study area. Modelling indicates that by the horizon year (2041), traffic on existing roadways will exceed available capacity (while allowing for increased transit and active transportation usage). Based on the exceedance of that capacity, a 4-lane road is required to address the demand. Active transportation facilities will be included in the interim and ultimate designs.
30.	Progress the design of the desired future build-out which includes the MUP or sidewalk and cycle track on the south side of Teston Rd	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with sidewalks and cycle tracks on both sides of Teston Road will need to be deferred to the ultimate stage of the project.
31.	Further understanding of the anticipated utility locations along Teston Rd, depths and required setbacks, as well as need for suggested overhead utilities. (eg. Are overhead powerlines necessary or can they be buried?)	Utilities have been inventoried on a preliminary basis to assess impacts and potential relocations due to the project. Further investigations / assessments will be conducted at detail design.

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary			Proponent Response – DRAFT (June 04, 2025)
			The project has not assessed the requirements for overhead or buried utilities.
32.		Progress ultimate road cross section to include more buffer zone off the face of the curb to accommodate trees along the street. The boulevard buffer is currently shown at 2.65m. Per York Region Road Design standards, minimum boulevard width to accommodate street tree planting is 3.4 metres, measured from back of curb to inside edge of active transportation facility, inclusive of maintenance/splash strip.	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with standard boulevard widths from Rodinea Road to Dufferin Street is not feasible – although further review of opportunities to enhance landscaping in the near term will be take place at the detail design stage of the project.
33.		Avoid disturbance of trees during future retrofits. Interim tree zone may conflict with the proposed future utility zone.	This will be reviewed during detailed design.
34.		Consider additional parking along Teston Rd (exploring replacing one or two through lanes) as lay-bys due to the constraints of the landfill and topography within the ravine area. In addition, explore dispersed off-site parking opportunities.	No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.
35.	Preferred Design: Section 1 Keele Street to Rodinea Road	Understanding the need for the interim condition at Keele St to be 6-lane wide. Consider a center median to enhance treed boulevard at park entry.	While the proposed through and turning lane design at Teston Road and Keele Street is necessary to accommodate travel demand and traffic movements, opportunities for context sensitive design in the area of the future NMRP will be considered at detail design.
36.		Identify future pedestrian/active transport facilities to determine optimal locations for crossings. (See suggested locations in attached figure)	A MUP (interim) and future sidewalks/cycle tracks are identified in the design. Crossing locations can be addressed during detailed design.
37.		Verify potential for transit stops within this section of Teston Rd (See suggested locations in attached figure)	York Region generally uses right turn lanes at intersections as transit stops, as would be the case along this section of Teston Road, assuming that future transit routes are implemented on this section of Teston Road. The locations noted for transit stops can be considered during detailed design, however, design constraints (landfill infrastructure, property, etc.) may limit the ability for transit stops at some locations.
38.		NMRP Master Plan (NMRPMP) to identify optimal locations for future parking areas to future-proof areas for curb cuts and entries.	Comment Noted.
39.		York Region to progress design of the safe GO Rail Crossing for O2 to incorporate into the NMRPMP.	The project will proceed with the interim At-Grade GO Rail Crossing with the long-term property protection for an at grade GO crossing. Safety requirements (i.e., lights and gates) at the rail crossing will be determined during detailed design.
40.	Preferred Design: Section 2 Rodinea Road to Valley	NMRPMP to progress and identify potential overhead pedestrian/cyclist crossings on the western side and identify potential land bridge connection on the eastern side of this section.	Comment Noted.
41.	Preferred Design: Section 3 Valley Crossing	NMRPMP to incorporate York Region's design of storage/treatment facilities under the roadway and outlets to stream. This aligns with the NMRP master plan's goal of establishing a monitoring station at the easternmost corner to evaluate the effectiveness of water treatment efforts before it is discharged into the river.	Comment Noted.

Review of Responses to City of Vaughan Comments on Draft YR Teston Road Area EA Report

Project/File: York Region Individual / Comprehensive Environmental Assessment and Preliminary Design for Teston Road Area between Highway 400 and Bathurst Street (P-19-218)

Date/Time: June 17, 2025 / 3:00 pm – 4:00 pm

Location: MS Teams

Next Meeting: n/a

Attendees: Billy Cheung (York Region (YR), PM), Maria Banayoty (YR, Project Coordinator)
Walid Omar (City of Vaughan (CoV), Transportation Engineering Specialist), Christopher Tam (CoV, Manager of Transportation Planning and Engineering), Jennifer Cappola-Logullo (CoV, Manager, Facilities and Parks Delivery Department), Michael McNamara (CoV), Carol Liu (CoV, Structure Planning Engineering), Paul Grove (CoV, Transportation Engineering), Michael Habib (CoV), Dorothy Kowpak (CoV, Active and Sustainable Transportation Program Manager), Wai Lam Tang (CoV, Transportation Engineering), George Missios (CoV, Environmental Engineer), Jessica Castellucci (CoV, Waste Management Coordinator), Tricia Fidelino (CoV, Project Coordinator, Facilities and Parks Delivery Department), Sabrina Davidson (CoV, Active Transportation Specialist), Julie Foy (CoV, Project Coordinator, Parks Delivery), Sandy Yang (CoV, Project Manager, Transportation Planning), Sarah Edgecombe (CoV, Landscape Technician)
Andrew Harkness (Stantec, PM), Meghan MacMillan (Stantec, Environmental Planner)

Absentees: Praveen John (YR), Joel Smith (YR), Hilda Esedebe (CoV), Jennifer Gill (CoV), Zachary Guizzetti (CoV)

Distribution: Distribution List

Item:	Action:
<p>Introductions</p> <p>Meeting attendees provided an introduction</p>	
<p>Project Status Update</p> <ul style="list-style-type: none"> • Andrew Harkness (AH) provided an update on the project status. <ul style="list-style-type: none"> ○ York Region (YR) published the draft Individual / Comprehensive Environmental Assessment report for public review in late 2024. The public and stakeholder review period ended at the end of 2024. Stantec has reviewed all comments and has updated technical reports and EA document. ○ At this time, Stantec and YR are reaching out to various review agencies to discuss their comments and YR's responses, in meetings such as this one. The intent is to finalize the EA report and submit to the Ministry of the Environment, Conservation and Parks (MECP) this summer. 	

Item:	Action:
<ul style="list-style-type: none"> ○ This is the first stakeholder meeting to review comments submitted on the EA and technical reports. ● Billy Cheung (BC): noted that meetings with the City of Toronto (CoT), MECP, and Toronto and Region Conservation Authority (TRCA) are being held to discuss their comments. YR is hoping to close out this project in the near future as the current Detail Design assignment is on hold. 	
<p>Open Discussion of Comments</p> <ul style="list-style-type: none"> ● AH asked Christopher Tam (CT) and Walid Omar (WO) if there were any high-level comments or updates the City of Vaughan (CoV) wished to raise. ● CT noted that the planning for the North Maple Regional Park (NMRP) within this area is a significant City undertaking. CT also noted CoV Council passed a resolution to assume this section of Teston Road from YR. Discussions are happening at the staff level. The NMRP team will provide more detailed comments. ● Jennifer Cappola-Logullo (JC-L) provided an overview of the City's interests with respect to the Regional Park: <ul style="list-style-type: none"> ○ Several conversations had been held with YR in the past to coordinate design and consider how to integrate the extension of Teston Road with the park development. ○ The City is looking for a solution that does not lead to a bisection of the park, with an integrated and context-sensitive design. ○ The City asked consultants working on the park master plan to develop ideas on how this integration could occur. ○ The City is also looking for "future proofing" of key nodes or connection points (e.g. trail connections, bike connections) from the road. ● AH noted the challenges of siting the road through the three former landfill sites and other infrastructure present. YR has reflected this in the current plan, which looks at two phases for implementation. When some of these constraints are lifted, this may create more opportunities for active transportation and integration. ● JC-L: What is timing for implementing? <ul style="list-style-type: none"> ○ BC: goal is to have the EA filed with MECP end of summer with construction of the initial phase (Teston Road from Dufferin Street to Keele Street) within the York Region latest 10-year Roads and Transit Growth Capital Construction Program with a target construction start date of 2030. ○ AH: MECP will require time to review the reporting; we would anticipate a response by the end of 2025. YR can then continue with Detail Design in 2026. ● Tricia Fidelino (TF) highlighted the environmental and ecological aspects of the project, such as wildlife crossing opportunities. Will there be opportunities for other facilities, such as enhancement of connections to NMRP (e.g., parking, transit connections)? TF also requested more clarity on what the constraints are that influenced the design. <ul style="list-style-type: none"> ○ AH explained ecological constraints were a primary consideration, particularly in the valley area. The design team 	

Item:	Action:
<p>looked at different span options to reduce footprint in the valley, as well as retaining walls.</p> <ul style="list-style-type: none"> ○ The presence of the three former landfills, landfill gas and leachate infrastructure were another main constraint. The design team has looked at toe walls as a solution to tighten the footprint and limit encroachment on adjacent properties and landfill monitoring infrastructure. More work will be needed during Detail Design to confirm exact locations of landfill monitoring infrastructure. ○ The design team also looked at the rail crossing. The EA recommends at grade but with protection for future grade separation. <ul style="list-style-type: none"> • Dorothy Kowpak (DK): if through Detail Design it is determined that some landfill constraints are not as significant as previously thought, is there an opportunity to adjust the design or implement ultimate active transportation facilities? <ul style="list-style-type: none"> ○ AH: the EA will obtain approval for the ultimate design, with an interim condition also identified. During Detail Design, a better sense of certain constraints will be developed, which can be used to inform some design refinement and phasing (e.g. adding south side active transportation along Teston Road between Dufferin Street and Rodinea Road). • JC-L: supports the idea of an interim design. If there are elements of an interim plan that can minimize impacts to CoT landfill infrastructure, this may allow easier implementation. Has there been engagement with the City of Toronto? <ul style="list-style-type: none"> ○ AH: the CoT has been engaged throughout the EA and has reviewed the draft EA reports and provided constructive comments. YR and Stantec will be having a similar meeting with the City of Toronto to discuss their comments. ○ BC: YR has made efforts to reach out and understand the CoT's interests, and to obtain buy in on what can be done now during the EA phase and what can be deferred as commitments for Detail Design. 	
<p>Review of Specific Comment Responses</p> <ul style="list-style-type: none"> • Carol Liu (CL): the response to comment 23 (with regards to a proposed future watermain) states that YR is to provide a separate follow up response. <ul style="list-style-type: none"> ○ BC: during the Detail Design assignment, YR will reach out to the CoV to coordinate. This is a commitment to discuss this item further. • JC-L: what is the opportunity for an interim design for the road connection? How can the design team achieve an integrative design concept with "future proofing" connections? <ul style="list-style-type: none"> ○ AH: the plan includes details at a conceptual level for several possible ultimate NMRP active transportation tie ins / connections, and an option for an access for NMRP parking. An interim solution is also identified. 	

Item:	Action:
<ul style="list-style-type: none"> • DK: it would be good to have more detail on what is meant by impacts to landfills. Regarding ultimate vs interim ROW widths, can you include details regarding the rationale for this (e.g., maximum ROW CoT would agree to) and why this does not meet all YR / CoV standards? Any interim infrastructure should be in its permanent location to the extent possible, to avoid needing to move landscaping, etc. for ultimate plan. <ul style="list-style-type: none"> ○ AH: We agree with minimizing the need to remove / relocate interim infrastructure to implement the ultimate design however there may need to be some future modifications (e.g. potentially replace north side MUP with a sidewalk and cycle track). There was no commitment from CoT in terms of maximum ROW width. • AH noted that the revised EA reports provide more detail and further discussion of impacts regarding landfills, and efforts to limit valley impacts. 	
<p>Next Steps:</p> <ul style="list-style-type: none"> • YR and Stantec are seeking to resolve and close out comments provided on the draft EA and technical reports. • YR and Stantec will continue to have similar meetings with other review agencies over the month of June. • Further comments can still be provided. • JC-L: can we expect to hear back on the comments raised today? <ul style="list-style-type: none"> ○ AH: we will circulate minutes and make minor revisions to the response table to reflect the meeting discussion. ○ The responses and meeting minutes will be appended to the EA report. • JC-L noted that the City's position with respect to avoiding bisecting the park has not been addressed. The City requests to see more options or conversations on this aspect. The design remains a major roadway. <ul style="list-style-type: none"> ○ AH: Teston Road is being planned as a four-lane standard arterial road (not a six-lane roadway) with consideration of context sensitive design and integration with NMRP. The design team considered other options like a Teston Road tunnel earlier on in the process, but a tunnel is not considered feasible at this location. Grade separated active transportation crossings are feasible in the valley area but would be very challenging in the area of the landfills due to the topography and the presence of landfill infrastructure and landfill waste. ○ BC: we have included various potential trail connections / crossings (both at-grade and grade separated), and these will need to be detailed out in coordination with the CoV's plans for NMRP when available. YR is committed to close coordination with CoV through project design and implementation. • Stantec will recirculate the comment response table based on feedback received today. • Walid Omar (WO) requested to receive the comment table in Excel, with an additional column for City staff to provide their responses. 	<p>Stantec will update and recirculate the comment response table in Excel format.</p> <p>City of Vaughan to review and provide any final comments in Excel table.</p>

Meeting adjourned at 4 PM.

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Sincerely,

Stantec Consulting Ltd.

Meghan MacMillan RPP, MCIP
Associate, Senior Environmental Planner
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Attachment: Updated YR Table of Responses to **CoV's** Comments on Draft EA Report

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary		
IEA Section Reference	Summary of Comment	Response – DRAFT (Rev. July 23, 2025)
City of Vaughan (December 22, 2024)		
<u>Development – Transportation Engineering (TE)</u>		
1. Appendix B – Design Drawings	<p>Questions about the design drawing (shown below) in Appendix B page 8 of 33.</p> <p>There is a retaining wall (1.4m high within the typical sight triangle area) on the northeast corner of Teston/Future Street A, located at 1500 Teston Road, according to the profile drawing from Teston Sands' Feb 2024 Engineering Submission (attachment 1). Is the retaining wall being considered? According to the profile drawing, the sidewalk on the west side of Street A will be 1.5m wide. TE's comments (attachment 2) asked the developer to relocate the sidewalk to the east side to increase the visibility of pedestrians. However, the sidewalk/MUP shown in Appendix B seems wider (~3m). Has this been confirmed with the developer? and how does it connect back to the 1.5m wide sidewalk? Not having received any subsequent submissions, we're not sure whether there will be changes to the engineering submission drawings last reviewed. Also, the MUP on the northeast corner stops at the dashed magenta line, which does not cover the elephant fleet crosswalk.</p>	<p>Designs have been shared with the developer of 1600 Teston (Teston Sands) and continued coordination will occur during detail design. Our design reflects the most recent design shared between the two design teams. As the Teston Road design is only preliminary, it is representative and will require refinements in the future.</p>
<u>Development Services and Environmental Engineering</u>		
2. Appendix G: Noise Report	<p>The report has identified several receptors with material increases in noise. No mitigation measures have been proposed for Receptors 4, 6 and 26 due to the presence of driveways which need to be maintained; however, Receptors 7 to 9, 18 and 19 also have a "significant change in noise levels" as modeled. The report notes two separate conclusions on this item: "below 60 dBA, defer decision until detailed design in the future prior to construction" and "sound levels are still predicted to be below 60 dBA and therefore mitigation should be deferred until levels are above 60 dBA". It is reasonable to defer until detailed design, but mitigation measures should be considered where feasible in the areas with significant increases rather than waiting "until levels are above 60 dBA."</p>	<p>Changes have been made to the Noise Report to reflect the comments provided. Noise mitigation should be deferred to detail design when the "future build" sound levels are below 60 dBA.</p> <p>The York Region policy and the need for noise mitigation is based upon sound levels being in excess of 60 dBA and mitigation can be deferred until sound levels reach that point. By the time this project proceeds to detail design the traffic volumes may have changed. In addition, there should be a revised noise analysis following 90% design and the vertical and horizontal alignment of the roadway could change.</p> <p>A developer-built barrier is already specified for Receptors 7 to 20.</p>
3. Appendix M: Contamination Overview Study	<p>The COS report is quite extensive, covering lands extending from Major Mackenzie to Kirby and from Bathurst to Highway 400, well beyond the boundaries of the corridor being assessed.</p> <p>Based on the review completed, a total of 10 Areas of Potential Environmental Concern (APECs) were identified. Of these 10, 4 APECs were proximate to the Teston Road corridor between Keele Street and Bathurst Street (Sections 1 to 4 of the design):</p> <ul style="list-style-type: none"> • APEC 1, the historical landfill operations; • APEC 2, the industrial park west of the Keele Valley Landfill; • APEC 3, the Metrolinx Barrie corridor; and • APEC 10, the intersection of Teston Road and Bathurst Street. <p>All of the other APECs are located over 1 km from the corridor.</p>	<p>The Contamination Overview Study was revised and the study area brought down to the proposed alignment with a 500 m buffer. APECs were refined accordingly.</p>
4. Appendix M: Contamination Overview Study	<p>It is noted that APEC 10 includes the dry-cleaning facility located at the northeast corner of this intersection (10815 Bathurst Street) but does not include the gasoline service station located at the southwest corner of this intersection (10700 Bathurst Street), despite this facility being identified as having a "high" risk level in Table 1 of the report. Regardless, the lands in the vicinity of APEC 10 are not part of any of the proposed property acquisitions, such that this may not be a material data gap, but should be addressed.</p>	<p>APECs table has been updated to include the gas station.</p>
5. Appendix N: Phase I ESAs	<p>Phase I ESA reports have been completed for all of the potential acquisition parcels</p> <ul style="list-style-type: none"> • Report 1, Properties 1 & 2: Adjoining parcels west of Keele Street, North of Teston Road. • Report 2, Property 3: Teston Road north ROW, south of 2190 Teston Road. • Report 3, Property 4: Teston Road north ROW, south of Vaughan Landfill. • Report 4, Property 5: Teston Road south ROW, north of KVLf. • Report 5, Property 6: Ravine Lands north ROW • Report 6, Property 7: Ravine Lands south ROW • Report 7, Property 8: Teston Road south ROW, north of 10500 Dufferin Street. 	<p>Comment Noted.</p>

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	Based on these reports, additional investigation has been recommended for Properties 1&2 (fuel spill and unknown fill quality), Property 4 (landfill activities and unknown fill quality), Property 5 (landfill activities and unknown fill quality), and Property 7 (fuel spills). The reports identify additional Potentially Contaminating Activities (PCAs) within their assessments; however, these are discounted as concerns based on distance, assumed groundwater gradient and/or other supplementary information provided.	
6. Appendix N: Phase I ESAs	With respect to Report 2 for Property 3, this study was completed in 2023 and did not identify any potential environmental concerns requiring further assessment. However, the Soil Investigation Report completed for this corridor, dated April 8, 2024 (discussed further below) identified soil exceedances of Cobalt and Nickel within approximately 30 m of the Property 3 boundaries. Given these new findings, the consultant is requested to review and confirm their previous conclusions as to whether further assessment is recommended.	BH-P5 is closer to the Phase One Property than the MH-BH1 which had the Cobalt and Nickel exceedances. Given this and the fact that the Phase One Property is undisturbed relative to the area around MH-BH1, we are comfortable with our recommendations 'as is'.
7. Appendix N: Phase I ESAs	With respect to Report 3 for Property 4, previous subsurface investigations are summarized which indicate groundwater exceedances to the applicable Site Condition Standards. In each case, it is noted that these wells are over 100 m from the Phase One Property. The consultant is requested to confirm whether there are any groundwater samples between the exceedances and the Phase One Property which serve as delineation samples.	No, there are no wells between OW5/81 and the Phase One Property. We have reviewed our recommendations and have decided not to change them.
8. Appendix O: Soil Investigation Report	The SIR included a corridor-wide sampling program, including 4 environmental-specific boreholes, 3 dual-purpose boreholes for foundation and environmental study, and 11 dual-purpose boreholes for pavement and environmental study. Overall, this study serves as a reasonable baseline for the corridor, and MH has outlined further work/next steps in their Conclusions and Recommendations.	Comment Noted.
9. Appendix O: Soil Investigation Report	As mentioned in my comment for the COS above, it is noted that there is a gas station adjacent to the east extent of the study area. The closest borehole to the tank nest at this location was 75 m northwest of the nest, in a cross-gradient location. It is requested that as part of further assessments completed in the future that this potentially contaminating activity be investigated. It is also noted that as based on the drawings provided, a watercourse runs beneath the intersection of Teston Road and Bathurst Street, such that sampling may need to be compared to Table 9 rather than Table 3 at that future test location.	The gas station is now noted as contributing to the APEC and will therefore be flagged for further investigation. We acknowledge your comment about the watercourse, which we trust will be considered in future assessments.
10. Appendix O: Soil Investigation Report	Section 3.4 notes that Table 3 Standards were selected in part because "the site and surrounding lands are serviced by a municipal drinking water supply which is not supplied by the local groundwater". However, Section 3.6 notes "The quality of soil to be imported in all other areas shall meet MECP's Table 2.1 Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition (Table 2.1 ESQS) or Table 3.1 Full Depth Excess Soil Quality Standards in a Non-Potable Ground Water Condition (Table 3.1 ESQS), depending on the presence or absence of potable groundwater wells within the Study Area." If this has not been determined, should Section 3.4 reference Table 2 instead? It does not appear that this will affect the results to-date as the only location with an exceedance also exceeded Table 3, but this should be clarified for further investigations.	Thank you for pointing out this inconsistency. We note that the hydrogeology report does point out that there may still be users of groundwater in the area. We have changed the assessment standards to Table 2.
11. Appendix O: Soil Investigation Report	This study is provided as a draft; a final copy is requested. It is also noted that the laboratory certificates of analysis attached to this are unsigned with blank signature fields. Signed copies should be included with the final report.	We will do our best to obtain and include the final signed copies of the certificates of analysis.
Forestry Operations		
12. Arborist Report and Tree Inventory, Preservation & Removals Plan	Forestry recommends York Region develops a dedicated communications plan for forestry issues related to this project. Considerations for the communications plan should include: <ul style="list-style-type: none"> • Community stakeholder, Ward Councillor, and Regional Councillor engagement • Notice provided to Service Vaughan team on how to best direct citizen inquiries to York Region • Post tree removal messaging developed for consistent responses to citizen inquiries and possible inclusion as CRM Knowledge Article for Service Vaughan 	York Region will undertake appropriate communication, and consultations with all appropriate stakeholders during detailed design and construction in accordance with existing procedures and protocols.
13. Arborist Report and Tree Inventory, Preservation & Removals Plan	In the tree inventory clearly state if any private trees are owned by the City of Vaughan.	Outside of the city owned properties in the valley, there are approximately 20 trees on City owned lands (primarily on the Vaughan Township landfill) that likely require removal. Within the valley lands, there are approximately 1.8 ha of tree removals (mapping of impacted areas has been provided along with this response). Precise counts for tree removals in these areas will be completed during detailed design.

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IEA Comment Summary		
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14.	Arborist Report and Tree Inventory, Preservation & Removals Plan In the tree inventory, include a column that shows the percentage of encroachment into the minimum tree protection zone (TPZ) that will be required to facilitate the proposed work for the privately owned trees marked for injury.	As the design is currently on preliminary it would be premature to complete this level of analysis. These details will be provided during detailed design.
15.	Arborist Report and Tree Inventory, Preservation & Removals Plan City of Vaughan Forestry will not be assigning a representative to monitor the root pruning that may occur; however, an ISA certified arborist is required to be on-site while this work is happening. While we may inspect the site at any point, it will be York Region's responsibility to hire and assign an arborist to be present at all times while roots are being pruned.	Comment noted.
16.	Arborist Report and Tree Inventory, Preservation & Removals Plan Forestry will not require York region to obtain a tree removal permit but will require compensation for privately owned/city owned tree removals according to the ratio below: 0-30cm DBH – 1 replacement required 31-40cm DBH – 2 replacements required 41-50cm DBH – 3 replacements required 51+cm DBH – 4 Replacements required	Tree compensation will be addressed as part of the detailed design as the impacts may change as the design is refined. It should be noted that ecosystem compensation recommendations are quantified for permanent loss areas, in accordance with the TRCA's <i>Guideline for Determining Ecosystem Compensation</i> (2023) and are discussed in Section 10.3.2.2 of the report and Appendix E (Natural Science Report). In general, over 12 hectares of compensation are recommended due to the impacts of the project. Further refinements to this recommendation will be made during detailed design.
17.	Arborist Report and Tree Inventory, Preservation & Removals Plan It is York Regions responsibility to obtain permission from the private tree owner prior to tree removal.	York Region will obtain permissions from the private tree owner if or when tree removal is required.
18.	Arborist Report and Tree Inventory, Preservation & Removals Plan Tree Protection Fencing is to be installed to minimize the impact on the trees (over 20cm DBH for Private and all City owned trees) to be preserved prior demolition/construction and is to remain until the construction is completed as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
19.	Arborist Report and Tree Inventory, Preservation & Removals Plan MLA 107A or ULA 110A Heavy Duty Tree protection fencing (plywood) is to be installed prior to construction and is to remain until construction is completed, as per By-Law 052-2018. MLA 107B or ULA 110B Light Duty Tree protection fencing (Snow Fence) may only be used where traffic sight lines will be affected within the road allowance, as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
20.	Arborist Report and Tree Inventory, Preservation & Removals Plan Tree protection shall be installed as outlined in the arborist report prior to the commencement of any construction/demolition activities.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
21.	Arborist Report and Tree Inventory, Preservation & Removals Plan The tree protection barriers shall be installed at their approved location and shall be maintained in their original location and condition until all construction activities within the site have ceased and all equipment is removed from the site. No equipment or material storage, flushing of fuel or washing of equipment is allowed within the TPZ. Any works within the TPZ area to be performed or supervised by a Certified Arborist.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
22.	Arborist Report and Tree Inventory, Preservation & Removals Plan Applicant shall notify Vaughan Forestry once Tree Protection (Hoarding) has been installed, to allow Vaughan Forestry to inspect and approve according to By-law 052-2018 and/or in accordance with the City of Vaughan's Tree Protection Protocol (2018).	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.
Infrastructure Planning and Engineering - Servicing		
23.	General Please refer to attached maps. In summary, there is no wastewater servicing identified in Integrated Urban Water Master Plan (IUWP) from Keele St to Bathurst St along Teston Rd. For the water system, a 400mm watermain is planned before 2051 from Rodinea Rd to Dufferin St. Granted, the Region plans to build a bridge crossing over the East Don River. The IUWP solution is a high-level masterplan, and a feasibility assessment has not yet been conducted. Could the Region explore the possibility of incorporating the watermain design into the Teston Road detailed design process? The City is willing to cover the additional scope of work for the watermain.	York Region to provide separate response. <u>At the detail design stage of the Teston Road project, the Region will review the potential to include (or make provision for) a City of Vaughan watermain (Rodinea Road to Dufferin Street) as part of the detail design process.</u>
O2 Planning and Design Inc. (on behalf of the City of Vaughan) – North Maple Regional Park Comments		
24.	Design Considerations Unified and Distinctive Public Realm <ul style="list-style-type: none"> Treed Boulevard Design: Enhance the treed canopy along the road wherever possible to provide shade and visual interest and vegetative buffer from the road. Consider a double-row (along the north side) tree alley where possible. 	Integration of the Teston Road right-of-way streetscaping with plans for North Maple Regional Park is an important design consideration for this project. Streetscaping in this area will be

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IEA Comment Summary		
IEA Section Reference	Summary of Comment	Response – DRAFT (Rev. July 23, 2025)
	<ul style="list-style-type: none"> Cohesive Landscape Design: Incorporate native planting and NMRP material palette for proposed site furnishings, lighting standards along Teston Rd. Public Art, Wayfinding and Interpretive Signage: Consider optimal location for public art/gateway features as well as interpretive signage that celebrate the site's natural and cultural heritage and ecological restoration efforts. 	designed in accordance with York Region's design standards in consultation with the City of Vaughan <u>and with consideration of how best to integrate with the NMRP</u> . Public Realm elements such as vegetation, planting, and site furnishings can be discussed during detailed design.
25.	<p>Accessibility and Seamless Mobility across the Park</p> <ul style="list-style-type: none"> Active Transportation Integration: Clearly marked, dedicated pedestrian and bike lanes on north and south side of Teston Rd. Enhanced Access Points and Gateways: create bold and inviting gateways to NMRP from east (towards the Headwaters district) and from the west (towards the Pondsides district). Safe Pedestrian and Cyclist Crossings: Well-marked pedestrian and cyclist crossings at regular intervals, with potentially traffic calming measures to reduce speed at higher-conflict areas. Consider overpasses or underpasses for pedestrians and cyclists to maintain continuous walkways and bike lanes that connect key areas within the park, allowing uninterrupted movement. 	Given the constraints of existing infrastructure associated with the landfills, dedicated pedestrian and bike lanes are not currently feasible <u>on both sides of the roadway through this area</u> . The ultimate design includes sidewalks and dedicated bike lanes (cycle tracks) on both sides of the roadway while only a north side MUP is proposed under the interim design until such time as the landfill infrastructure is decommissioned. <u>The ultimate design also includes several potential at-grade and grade-separated trail connections to/from and through NMRP and the Don River West Branch valley as well as a potential signalized NMRP parking lot access and active transportation road crossing.</u> <u>Opportunities to include more of the above elements in the interim design will be explored at detail design. Underpasses are not considered feasible within the vicinity of the Vaughan Landfill and Keele Valley Landfill.</u>
26.	<p>Wildlife Corridors/Wildlife – Friendly Road Design</p> <ul style="list-style-type: none"> Wildlife Crossings: Overpasses or underpasses for wildlife to maintain ecological corridors. Ecological plantings: Native planting and habitat restoration along the road's edges to enhance the park's ecological functions. Leverage offsetting plans that may be required for compensation for loss of habitat if there are species at risk. Potential to include concurrent project of tall-grass prairie restoration concurrently with the road extension or potential land bridge work. 	Wildlife crossing has been considered and included in the Preliminary Design within the valley portion of the design. Crossing within the landfill limits are not included as part of the Preliminary Design due to infrastructure constraints. Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.
27.	<p>Leading with Resilience and Sustainability</p> <ul style="list-style-type: none"> Stormwater management: Where feasible, integrate bioswales and vegetated buffers (understanding bioswales within landfills not acceptable) Enhanced forests / nodal plantings: Tree plantings and native species restoration along the road to improve the visual experience and provide habitat. Energy-efficient lighting: Consider alternative energy lighting such as solar-powered or energy efficient lighting systems. 	<p>Drainage and stormwater management measures are proposed to accommodate the roadway improvements including construction of a new storm sewer system and extension/relocation of existing culverts. Stormwater management will continue to be evaluated during detailed design.</p> <p>Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.</p>
28.	<p>Parking and Transit Facilities</p> <ul style="list-style-type: none"> Proposed Parking: Off-road parking areas that minimize disruption to the park landscape. <p>Future Bus Stops: Integration of public transit options to reduce traffic congestion and provide alternative transportation to the park.</p>	<p>No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.</p> <p>Integration of transit stops will be addressed during detailed design.</p>
29.	<p>Preferred Design Section 9</p> <p>What is the rationale for a 4-lane road in year 49? See precedent of Central Park NY, where the 36m ROW of vehicular lanes are reduced to promote active transportation.</p>	Traffic lane requirements are determined by modelling future travel demand levels and travel movements in the area to understand the number of vehicle movements through the study area. Modelling indicates that by the horizon year (2041), traffic on existing roadways will exceed available capacity (while allowing for increased transit and active transportation usage). Based on the exceedance of that capacity, a 4-lane road is

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IEA Comment Summary		
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		required to address the demand. Active transportation facilities will be included in the interim and ultimate designs.
30.	Progress the design of the desired future build-out which includes the MUP or sidewalk and cycle track on the south side of Teston Rd	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with sidewalks and cycle tracks on both sides of Teston Road will <u>likely</u> need to be deferred to the ultimate stage of the project. <u>However, opportunities to include additional south side active transportation facilities can be explored at detail design.</u>
31.	Further understanding of the anticipated utility locations along Teston Rd, depths and required setbacks, as well as need for suggested overhead utilities. (eg. Are overhead powerlines necessary or can they be buried?)	Utilities have been inventoried on a preliminary basis to assess impacts and potential relocations due to the project. Further investigations / assessments will be conducted at detail design. The project has not assessed the requirements for overhead or buried utilities.
32.	Progress ultimate road cross section to include more buffer zone off the face of the curb to accommodate trees along the street. The boulevard buffer is currently shown at 2.65m. Per York Region Road Design standards, minimum boulevard width to accommodate street tree planting is 3.4 metres, measured from back of curb to inside edge of active transportation facility, inclusive of maintenance/splash strip.	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with standard boulevard widths from Rodinea Road to Dufferin Street is not feasible – although further review of opportunities to enhance landscaping in the near term will be take place at the detail design stage of the project.
33.	Avoid disturbance of trees during future retrofits. Interim tree zone may conflict with the proposed future utility zone.	This will be reviewed during detailed design. <u>Efforts will be made to ensure that interim design plantings are not disturbed in the future transition from the interim to the ultimate design.</u>
34.	Consider additional parking along Teston Rd (exploring replacing one or two through lanes) as lay-bys due to the constraints of the landfill and topography within the ravine area. In addition, explore dispersed off-site parking opportunities.	No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.
35.	Preferred Design: Section 1 Keele Street to Rodinea Road Understanding the need for the interim condition at Keele St to be 6-lane wide. Consider a center median to enhance treed boulevard at park entry.	While the proposed through and turning lane design at Teston Road and Keele Street is necessary to accommodate travel demand and traffic movements, opportunities for context sensitive design in the area of the future NMRP will be considered at detail design.
36.	Identify future pedestrian/active transport facilities to determine optimal locations for crossings. (See suggested locations in attached figure)	A MUP (interim) and future sidewalks/cycle tracks are identified in the design. Crossing locations can be addressed during detailed design.
37.	Verify potential for transit stops within this section of Teston Rd (See suggested locations in attached figure)	York Region generally uses right turn lanes at intersections as transit stops, as would be the case along this section of Teston Road, assuming that future transit routes are implemented on this section of Teston Road. The locations noted for transit stops can be considered during detailed design, however, design constraints (landfill infrastructure, property, etc.) may limit the ability for transit stops at some locations.
38.	NMRP Master Plan (NMRPMP) to identify optimal locations for future parking areas to future-proof areas for curb cuts and entries.	Comment Noted.
39.	York Region to progress design of the safe GO Rail Crossing for O2 to incorporate into the NMRPMP.	The project will proceed with the interim At-Grade GO Rail Crossing with the long-term property protection for an at grade GO crossing. Safety requirements (i.e., lights and gates) at the rail crossing will be determined during detailed design.
40.	Preferred Design: Section 2 Rodinea Road to Valley NMRPMP to progress and identify potential overhead pedestrian/cyclist crossings on the western side and identify potential land bridge connection on the eastern side of this section.	Comment Noted.
41.	Preferred Design: Section 3 Valley Crossing NMRPMP to incorporate York Region's design of storage/treatment facilities under the roadway and outlets to stream. This aligns with the NMRP master plan's goal of establishing a monitoring station at the easternmost corner to evaluate the effectiveness of water treatment efforts before it is discharged into the river.	Comment Noted.

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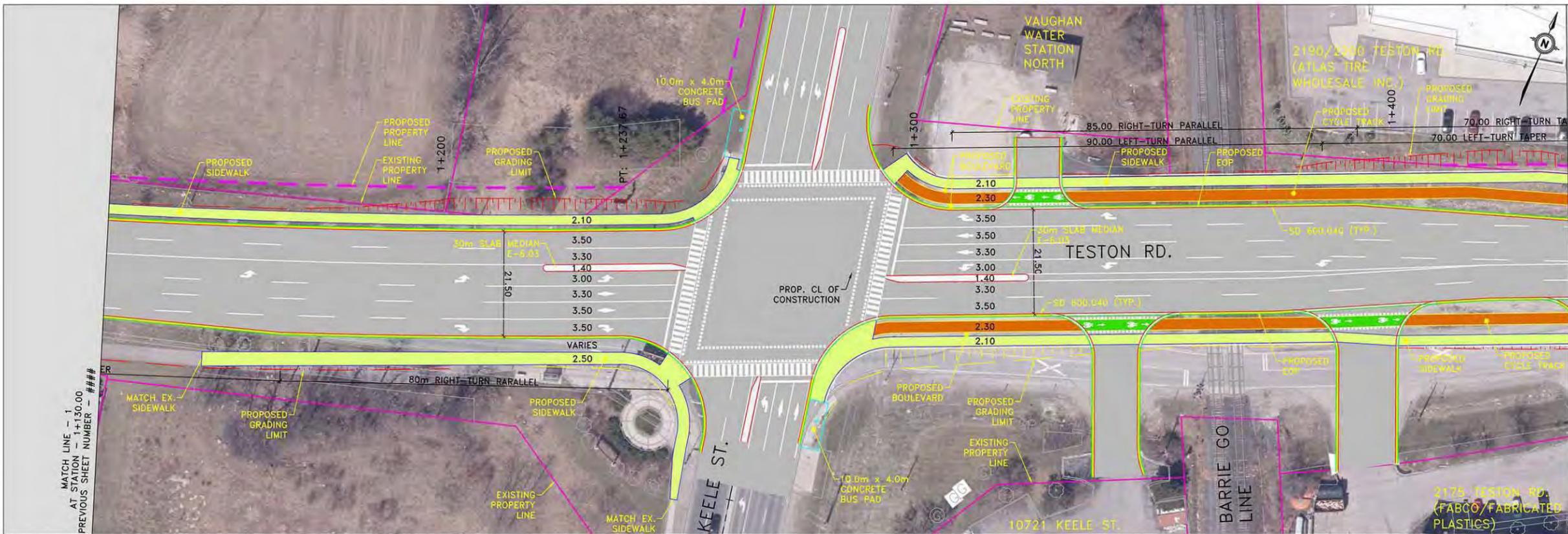
**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region (YR) - Teston Road Area Improvements (Keele Street to Bathurst Street) IEA**

IEA Comment Summary				
IEA Section Reference	Summary of Comment	YR Response – DRAFT (Rev. July 23, 2025)	CoV Follow-up Response (August 15, 2025)	YR - Follow-up Response – DRAFT (August 21, 2025)
City of Vaughan (CoV) (December 22, 2024)				
Development – Transportation Engineering (TE)				
1.	Appendix B – Design Drawings	<p>Questions about the design drawing (shown below) in Appendix B page 8 of 33.</p> <p>There is a retaining wall (1.4m high within the typical sight triangle area) on the northeast corner of Teston/Future Street A, located at 1500 Teston Road, according to the profile drawing from Teston Sands' Feb 2024 Engineering Submission (attachment 1). Is the retaining wall being considered? According to the profile drawing, the sidewalk on the west side of Street A will be 1.5m wide. TE's comments (attachment 2) asked the developer to relocate the sidewalk to the east side to increase the visibility of pedestrians. However, the sidewalk/MUP shown in Appendix B seems wider (~3m). Has this been confirmed with the developer? and how does it connect back to the 1.5m wide sidewalk? Not having received any subsequent submissions, we're not sure whether there will be changes to the engineering submission drawings last reviewed. Also, the MUP on the northeast corner stops at the dashed magenta line, which does not cover the elephant fleet crosswalk.</p>	<p>Designs have been shared with the developer of 1600 Teston (Teston Sands) and continued coordination will occur during detail design. Our design reflects the most recent design shared between the two design teams. As the Teston Road design is only preliminary, it is representative and will require refinements in the future.</p>	Noted.
Development Services and Environmental Engineering				
2.	Appendix G: Noise Report	<p>The report has identified several receptors with material increases in noise. No mitigation measures have been proposed for Receptors 4, 6 and 26 due to the presence of driveways which need to be maintained; however, Receptors 7 to 9, 18 and 19 also have a "significant change in noise levels" as modeled. The report notes two separate conclusions on this item: "below 60 dBA, defer decision until detailed design in the future prior to construction" and "sound levels are still predicted to be below 60 dBA and therefore mitigation should be deferred until levels are above 60 dBA". It is reasonable to defer until detailed design, but mitigation measures should be considered where feasible in the areas with significant increases rather than waiting "until levels are above 60 dBA."</p>	<p>Changes have been made to the Noise Report to reflect the comments provided. Noise mitigation should be deferred to detail design when the "future build" sound levels are below 60 dBA.</p> <p>The York Region policy and the need for noise mitigation is based upon sound levels being in excess of 60 dBA and mitigation can be deferred until sound levels reach that point. By the time this project proceeds to detail design the traffic volumes may have changed. In addition, there should be a revised noise analysis following 90% design and the vertical and horizontal alignment of the roadway could change.</p> <p>A developer-built barrier is already specified for Receptors 7 to 20.</p>	Noted. Noted. Noted.
3.	Appendix M: Contamination Overview Study	<p>The COS report is quite extensive, covering lands extending from Major Mackenzie to Kirby and from Bathurst to Highway 400, well beyond the boundaries of the corridor being assessed.</p> <p>Based on the review completed, a total of 10 Areas of Potential Environmental Concern (APECs) were identified. Of these 10, 4 APECs were proximate to the Teston Road corridor between Keele Street and Bathurst Street (Sections 1 to 4 of the design):</p> <ul style="list-style-type: none"> APEC 1, the historical landfill operations; APEC 2, the industrial park west of the Keele Valley Landfill; APEC 3, the Metrolinx Barrie corridor; and APEC 10, the intersection of Teston Road and Bathurst Street. <p>All of the other APECs are located over 1 km from the corridor.</p>	<p>The Contamination Overview Study was revised and the study area brought down to the proposed alignment with a 500 m buffer. APECs were refined accordingly.</p>	Noted.
4.	Appendix M: Contamination Overview Study	<p>It is noted that APEC 10 includes the dry-cleaning facility located at the northeast corner of this intersection (10815 Bathurst Street) but does not include the gasoline service station located at the southwest corner of this intersection (10700 Bathurst Street), despite this facility being identified as having a "high" risk level in Table 1 of the report. Regardless, the lands in the vicinity of APEC 10 are not part of any of the proposed property acquisitions, such that this may not be a material data gap, but should be addressed.</p>	<p>APECs table has been updated to include the gas station.</p>	Noted.
5.	Appendix N: Phase I ESAs	<p>Phase I ESA reports have been completed for all of the potential acquisition parcels</p> <p>Report 1, Properties 1 & 2: Adjoining parcels west of Keele Street, North of Teston Road. Report 2, Property 3: Teston Road north ROW, south of 2190 Teston Road. Report 3, Property 4: Teston Road north ROW, south of Vaughan Landfill. Report 4, Property 5: Teston Road south ROW, north of KVLF. Report 5, Property 6: Ravine Lands north ROW Report 6, Property 7: Ravine Lands south ROW Report 7, Property 8: Teston Road south ROW, north of 10500 Dufferin Street.</p> <p>Based on these reports, additional investigation has been recommended for Properties 1&2 (fuel spill and unknown fill quality), Property 4 (landfill activities and unknown fill quality), Property 5 (landfill activities and unknown fill quality), and Property 7 (fuel spills). The reports identify additional Potentially Contaminating Activities (PCAs) within their assessments; however, these are discounted as concerns based on distance, assumed groundwater gradient and/or other supplementary information provided.</p>	<p>Comment Noted.</p>	Noted.
6.	Appendix N: Phase I ESAs	<p>With respect to Report 2 for Property 3, this study was completed in 2023 and did not identify any potential environmental concerns requiring further assessment. However, the Soil Investigation Report completed for this corridor, dated April 8, 2024 (discussed further below) identified soil exceedances of Cobalt and Nickel within approximately 30 m of the Property 3 boundaries. Given these new findings, the consultant is requested to review and confirm their previous conclusions as to whether further assessment is recommended.</p>	<p>BH-P5 is closer to the Phase One Property than the MH-BH1 which had the Cobalt and Nickel exceedances. Given this and the fact that the Phase One Property is undisturbed relative to the area around MH-BH1, we are comfortable with our recommendations 'as is'.</p>	Noted.
7.	Appendix N: Phase I ESAs	<p>With respect to Report 3 for Property 4, previous subsurface investigations are summarized which indicate groundwater exceedances to the applicable Site Condition Standards. In each case, it is noted that these wells are over 100 m from the Phase One Property. The consultant is requested to confirm whether there are any groundwater samples between the exceedances and the Phase One Property which serve as delineation samples.</p>	<p>No, there are no wells between OW5/81 and the Phase One Property. We have reviewed our recommendations and have decided not to change them.</p>	Noted.
8.	Appendix O: Soil Investigation Report	<p>The SIR included a corridor-wide sampling program, including 4 environmental-specific boreholes, 3 dual-purpose boreholes for foundation and environmental study, and 11 dual-purpose boreholes for pavement and environmental study.</p> <p>Overall, this study serves as a reasonable baseline for the corridor, and MH has outlined further work/next steps in their Conclusions and Recommendations.</p>	<p>Comment Noted.</p>	Noted.
9.	Appendix O: Soil Investigation Report	<p>As mentioned in my comment for the COS above, it is noted that there is a gas station adjacent to the east extent of the study area. The closest borehole to the tank nest at this location was 75 m northwest of the nest, in a cross-gradient location. It is requested that as part of further assessments completed in the future that this potentially contaminating activity be investigated. It is also noted that as based on the drawings provided, a watercourse runs beneath the intersection of Teston Road and Bathurst Street, such that sampling may need to be compared to Table 9 rather than Table 3 at that future test location.</p>	<p>The gas station is now noted as contributing to the APEC and will therefore be flagged for further investigation. We acknowledge your comment about the watercourse, which we trust will be considered in future assessments.</p>	Noted.

10.	Appendix O: Soil Investigation Report	Section 3.4 notes that Table 3 Standards were selected in part because "the site and surrounding lands are serviced by a municipal drinking water supply which is not supplied by the local groundwater". However, Section 3.6 notes "The quality of soil to be imported in all other areas shall meet MECP's Table 2.1 Full Depth Excess Soil Quality Standards in a Potable Ground Water Condition (Table 2.1 ESQS) or Table 3.1 Full Depth Excess Soil Quality Standards in a Non-Potable Ground Water Condition (Table 3.1 ESQS), depending on the presence or absence of potable groundwater wells within the Study Area." If this has not been determined, should Section 3.4 reference Table 2 instead? It does not appear that this will affect the results to-date as the only location with an exceedance also exceeded Table 3, but this should be clarified for further investigations.	Thank you for pointing out this inconsistency. We note that the hydrogeology report does point out that there may still be users of groundwater in the area. We have changed the assessment standards to Table 2.	Noted.
11.	Appendix O: Soil Investigation Report	This study is provided as a draft; a final copy is requested. It is also noted that the laboratory certificates of analysis attached to this are unsigned with blank signature fields. Signed copies should be included with the final report.	We will do our best to obtain and include the final signed copies of the certificates of analysis.	Noted.
Forestry Operations				
12.	Arborist Report and Tree Inventory, Preservation & Removals Plan	Forestry recommends York Region develops a dedicated communications plan for forestry issues related to this project. Considerations for the communications plan should include: <ul style="list-style-type: none"> Community stakeholder, Ward Councillor, and Regional Councillor engagement Notice provided to Service Vaughan team on how to best direct citizen inquiries to York Region Post tree removal messaging developed for consistent responses to citizen inquiries and possible inclusion as CRM Knowledge Article for Service Vaughan 	York Region will undertake appropriate communication, and consultations with all appropriate stakeholders during detailed design and construction in accordance with existing procedures and protocols.	Noted.
13.	Arborist Report and Tree Inventory, Preservation & Removals Plan	In the tree inventory clearly state if any private trees are owned by the City of Vaughan.	Outside of the city owned properties in the valley, there are approximately 20 trees on City owned lands (primarily on the Vaughan Township landfill) that likely require removal. Within the valley lands, there are approximately 1.8 ha of tree removals (mapping of impacted areas has been provided along with this response). Precise counts for tree removals in these areas will be completed during detailed design.	Noted.
14.	Arborist Report and Tree Inventory, Preservation & Removals Plan	In the tree inventory, include a column that shows the percentage of encroachment into the minimum tree protection zone (TPZ) that will be required to facilitate the proposed work for the privately owned trees marked for injury.	As the design is currently on preliminary it would be premature to complete this level of analysis. These details will be provided during detailed design.	Noted.
15.	Arborist Report and Tree Inventory, Preservation & Removals Plan	City of Vaughan Forestry will not be assigning a representative to monitor the root pruning that may occur; however, an ISA certified arborist is required to be on-site while this work is happening. While we may inspect the site at any point, it will be York Region's responsibility to hire and assign an arborist to be present at all times while roots are being pruned.	Comment noted.	
16.	Arborist Report and Tree Inventory, Preservation & Removals Plan	Forestry will not require York region to obtain a tree removal permit but will require compensation for privately owned/city owned tree removals according to the ratio below: <ul style="list-style-type: none"> 0-30cm DBH – 1 replacement required 31-40cm DBH – 2 replacements required 41-50cm DBH – 3 replacements required 51+cm DBH – 4 Replacements required 	Tree compensation will be addressed as part of the detailed design as the impacts may change as the design is refined. It should be noted that ecosystem compensation recommendations are quantified for permanent loss areas, in accordance with the TRCA's <i>Guideline for Determining Ecosystem Compensation</i> (2023) and are discussed in Section 10.3.2.2 of the report and Appendix E (Natural Science Report). In general, over 12 hectares of compensation are recommended due to the impacts of the project. Further refinements to this recommendation will be made during detailed design.	Noted.
17.	Arborist Report and Tree Inventory, Preservation & Removals Plan	It is York Regions responsibility to obtain permission from the private tree owner prior to tree removal.	York Region will obtain permissions from the private tree owner if or when tree removal is required.	Noted.
18.	Arborist Report and Tree Inventory, Preservation & Removals Plan	Tree Protection Fencing is to be installed to minimize the impact on the trees (over 20cm DBH for Private and all City owned trees) to be preserved prior demolition/construction and is to remain until the construction is completed as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.	Noted.
19.	Arborist Report and Tree Inventory, Preservation & Removals Plan	MLA 107A or ULA 110A Heavy Duty Tree protection fencing (plywood) is to be installed prior to construction and is to remain until construction is completed, as per By-Law 052-2018. MLA 107B or ULA 110B Light Duty Tree protection fencing (Snow Fence) may only be used where traffic sight lines will be affected within the road allowance, as per By-Law 052-2018.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.	Noted.
20.	Arborist Report and Tree Inventory, Preservation & Removals Plan	Tree protection shall be installed as outlined in the arborist report prior to the commencement of any construction/demolition activities.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.	Noted.
21.	Arborist Report and Tree Inventory, Preservation & Removals Plan	The tree protection barriers shall be installed at their approved location and shall be maintained in their original location and condition until all construction activities within the site have ceased and all equipment is removed from the site. No equipment or material storage, flushing of fuel or washing of equipment is allowed within the TPZ. Any works within the TPZ area to be performed or supervised by a Certified Arborist.	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.	Noted.
22.	Arborist Report and Tree Inventory, Preservation & Removals Plan	Applicant shall notify Vaughan Forestry once Tree Protection (Hoarding) has been installed, to allow Vaughan Forestry to inspect and approve according to By-law 052-2018 and/or in accordance with the City of Vaughan's Tree Protection Protocol (2018).	Per the Arborist Report, tree protection fencing will be installed in accordance with York Region's <i>Street Tree and Forest Preservation Guidelines</i> and follow their typical detail drawing NHF-400.	Noted.
Infrastructure Planning and Engineering - Servicing				
23.	General	Please refer to attached maps. In summary, there is no wastewater servicing identified in Integrated Urban Water Master Plan (IUWP) from Keele St to Bathurst St along Teston Rd. For the water system, a 400mm watermain is planned before 2051 from Rodinea Rd to Dufferin St. Granted, the Region plans to build a bridge crossing over the East Don River. The IUWP solution is a high-level masterplan, and a feasibility assessment has not yet been conducted. Could the Region explore the possibility of incorporating the watermain design into the Teston Road detailed design process? The City is willing to cover the additional scope of work for the watermain.	At the detail design stage of the Teston Road project, the Region will review the potential to include (or make provision for) a City of Vaughan watermain (Rodinea Road to Dufferin Street) as part of the detail design process.	Noted.
O2 Planning and Design Inc. (on behalf of the City of Vaughan) – North Maple Regional Park Comments				
24.		Unified and Distinctive Public Realm <ul style="list-style-type: none"> Treed Boulevard Design: Enhance the treed canopy along the road wherever possible to provide shade and visual interest and vegetative buffer from the road. Consider a double-row (along the north side) tree alley where possible. Cohesive Landscape Design: Incorporate native planting and NMRP material palette for proposed site furnishings, lighting standards along Teston Rd. Public Art, Wayfinding and Interpretive Signage: Consider optimal location for public art/gateway features as well as interpretive signage that celebrate the site's natural and cultural heritage and ecological restoration efforts. 	Integration of the Teston Road right-of-way streetscaping with plans for North Maple Regional Park is an important design consideration for this project. Streetscaping in this area will be designed in accordance with York Region's design standards in consultation with the City of Vaughan and with consideration of how best to integrate with the NMRP. Public Realm elements such as vegetation, planting, and site furnishings can be discussed during detailed design.	Noted.

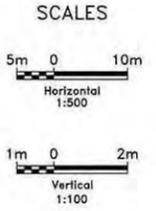
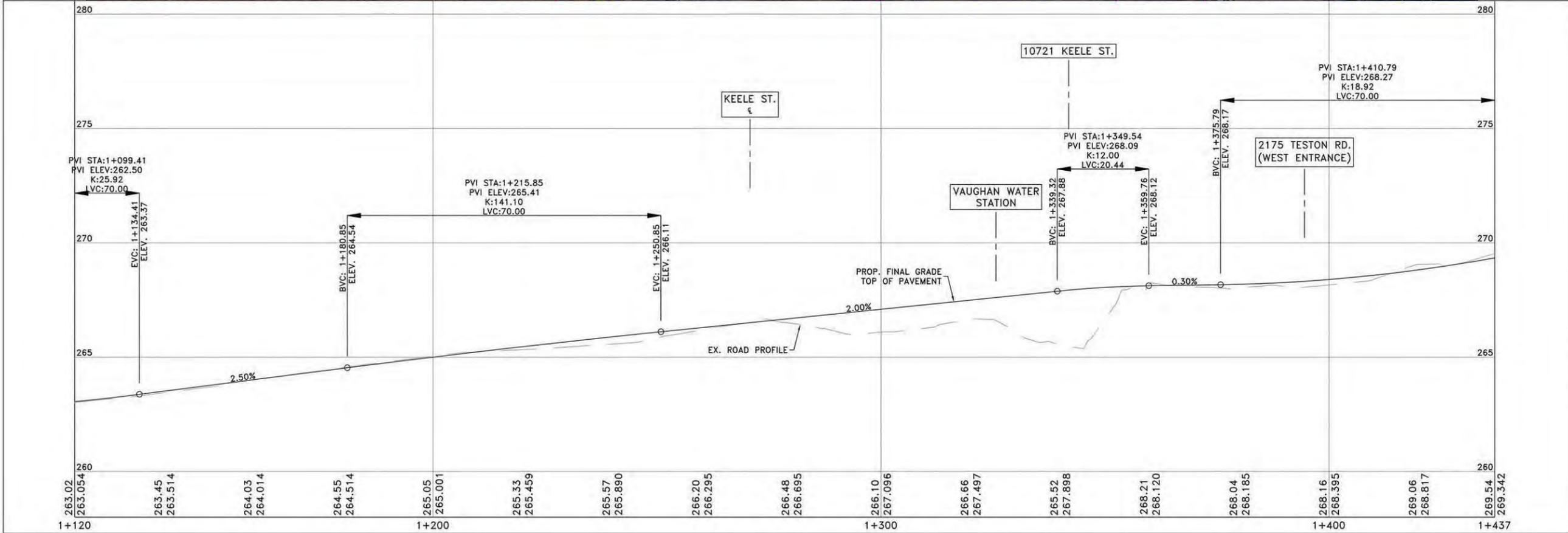
25.	Design Considerations	<p>Accessibility and Seamless Mobility across the Park</p> <ul style="list-style-type: none"> Active Transportation Integration: Clearly marked, dedicated pedestrian and bike lanes on north and south side of Teston Rd. Enhanced Access Points and Gateways: create bold and inviting gateways to NMRP from east (towards the Headwaters district) and from the west (towards the Pondsides district). Safe Pedestrian and Cyclist Crossings: Well-marked pedestrian and cyclist crossings at regular intervals, with potentially traffic calming measures to reduce speed at higher-conflict areas. Consider overpasses or underpasses for pedestrians and cyclists to maintain continuous walkways and bike lanes that connect key areas within the park, allowing uninterrupted movement. 	<p>Given the constraints of existing infrastructure associated with the landfills, dedicated pedestrian and bike lanes are not currently feasible on both sides of the roadway through this area. The ultimate design includes sidewalks and dedicated bike lanes (cycle tracks) on both sides of the roadway while only a north side MUP is proposed under the interim design until such time as the landfill infrastructure is decommissioned. The ultimate design also includes several potential at-grade and grade-separated trail connections to/from and through NMRP and the Don River West Branch valley as well as a potential signalized NMRP parking lot access and active transportation road crossing.</p> <p>Opportunities to include more of the above elements in the interim design will be explored at detail design. Underpasses are not considered feasible within the vicinity of the Vaughan Landfill and Keele Valley Landfill.</p>	Noted.	
26.		<p>Wildlife Corridors/Wildlife – Friendly Road Design</p> <ul style="list-style-type: none"> Wildlife Crossings: Overpasses or underpasses for wildlife to maintain ecological corridors. Ecological plantings: Native planting and habitat restoration along the road's edges to enhance the park's ecological functions. Leverage offsetting plans that may be required for compensation for loss of habitat if there are species at risk. Potential to include concurrent project of tall-grass prairie restoration concurrently with the road extension or potential land bridge work. 	Wildlife crossing has been considered and included in the Preliminary Design within the valley portion of the design. Crossing within the landfill limits are not included as part of the Preliminary Design due to infrastructure constraints. Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.	Noted.	
27.		<p>Leading with Resilience and Sustainability</p> <ul style="list-style-type: none"> Stormwater management: Where feasible, integrate bioswales and vegetated buffers (understanding bioswales within landfills not acceptable) Enhanced forests / nodal plantings: Tree plantings and native species restoration along the road to improve the visual experience and provide habitat. Energy-efficient lighting: Consider alternative energy lighting such as solar-powered or energy efficient lighting systems. 	<p>Drainage and stormwater management measures are proposed to accommodate the roadway improvements including construction of a new storm sewer system and extension/relocation of existing culverts. Stormwater management will continue to be evaluated during detailed design.</p> <p>Plantings and habitat restoration opportunities are discussed in Appendix E (Natural Science report) and will be further expanded on during detailed design.</p>	Noted.	
28.		<p>Parking and Transit Facilities</p> <ul style="list-style-type: none"> Proposed Parking: Off-road parking areas that minimize disruption to the park landscape. <p>Future Bus Stops: Integration of public transit options to reduce traffic congestion and provide alternative transportation to the park.</p>	<p>No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.</p> <p>Integration of transit stops will be addressed during detailed design.</p>	Noted.	
29.	Preferred Design	What is the rationale for a 4-lane road in year 49? See precedent of Central Park NY, where the 36m ROW of vehicular lanes are reduced to promote active transportation.	Traffic lane requirements are determined by modelling future travel demand levels and travel movements in the area to understand the number of vehicle movements through the study area. Modelling indicates that by the horizon year (2041), traffic on existing roadways will exceed available capacity (while allowing for increased transit and active transportation usage). Based on the exceedance of that capacity, a 4-lane road is required to address the demand. Active transportation facilities will be included in the interim and ultimate designs.	Noted.	
30.	Section 9	Progress the design of the desired future build-out which includes the MUP or sidewalk and cycle track on the south side of Teston Rd	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with sidewalks and cycle tracks on both sides of Teston Road will likely need to be deferred to the ultimate stage of the project. However, opportunities to include additional south side active transportation facilities can be explored at detail design.	Noted.	
31.		Further understanding of the anticipated utility locations along Teston Rd, depths and required setbacks, as well as need for suggested overhead utilities. (eg. Are overhead powerlines necessary or can they be buried?)	Utilities have been inventoried on a preliminary basis to assess impacts and potential relocations due to the project. Further investigations / assessments will be conducted at detail design. The project has not assessed the requirements for overhead or buried utilities.	Noted.	
32.		Progress ultimate road cross section to include more buffer zone off the face of the curb to accommodate trees along the street. The boulevard buffer is currently shown at 2.65m. Per York Region Road Design standards, minimum boulevard width to accommodate street tree planting is 3.4 metres, measured from back of curb to inside edge of active transportation facility, inclusive of maintenance/ splash strip.	Due to landfill infrastructure that will remain in place for the foreseeable future, the future buildout with standard boulevard widths from Rodinea Road to Dufferin Street is not feasible – although further review of opportunities to enhance landscaping in the near term will be take place at the detail design stage of the project.	Noted.	
33.		Avoid disturbance of trees during future retrofits. Interim tree zone may conflict with the proposed future utility zone.	This will be reviewed during detailed design. Efforts will be made to ensure that interim design plantings are not disturbed in the future transition from the interim to the ultimate design.	Noted.	
34.		Consider additional parking along Teston Rd (exploring replacing one or two through lanes) as lay-bys due to the constraints of the landfill and topography within the ravine area. In addition, explore dispersed off-site parking opportunities.	No parking (on-road or otherwise) is being considered as part of this project. Entrances to city parking lots on park lands can be considered during detailed design.	Noted.	
35.	Preferred Design: Section 1 Keele Street to Rodinea Road	Understanding the need for the interim condition at Keele St to be 6-lane wide. Consider a center median to enhance treed boulevard at park entry.	While the proposed through and turning lane design at Teston Road and Keele Street is necessary to accommodate travel demand and traffic movements, opportunities for context sensitive design in the area of the future NMRP will be considered at detail design.	Noted.	
36.		Identify future pedestrian/active transport facilities to determine optimal locations for crossings. (See suggested locations in attached figure)	A MUP (interim) and future sidewalks/cycle tracks are identified in the design. Crossing locations can be addressed during detailed design.	Noted.	
37.		Verify potential for transit stops within this section of Teston Rd (See suggested locations in attached figure)	York Region generally uses right turn lanes at intersections as transit stops, as would be the case along this section of Teston Road, assuming that future transit routes are implemented on this section of Teston Road. The locations noted for transit stops can be considered during detailed design, however, design constraints (landfill infrastructure, property, etc.) may limit the ability for transit stops at some locations.	Noted.	
38.		NMRP Master Plan (NMRPMP) to identify optimal locations for future parking areas to future-proof areas for curb cuts and entries.	Comment Noted.	Noted.	

39.		York Region to progress design of the safe GO Rail Crossing for O2 to incorporate into the NMRPMP.	The project will proceed with the interim At-Grade GO Rail Crossing with the long-term property protection for an at grade GO crossing. Safety requirements (i.e., lights and gates) at the rail crossing will be determined during detailed design.	Noted.	
40.	Preferred Design: Section 2 Rodinea Road to Valley	NMRPMP to progress and identify potential overhead pedestrian/cyclist crossings on the western side and identify potential land bridge connection on the eastern side of this section.	Comment Noted.	Noted.	
41.	Preferred Design: Section 3 Valley Crossing	NMRPMP to incorporate York Region's design of storage/treatment facilities under the roadway and outlets to stream. This aligns with the NMRP master plan's goal of establishing a monitoring station at the easternmost corner to evaluate the effectiveness of water treatment efforts before it is discharged into the river.	Comment Noted.	Noted.	
Additional Comments (August 15, 2025)					
42.	Coordination	Should we show the road design (from the EA open house), and is it possible to get any CAD linework to integrate it into the plan? Or should this be demonstrated simply as a placeholder?			The EA Report includes commitments for York Region to work with the City of Vaughan on near and longer term coordination of how best to integrate the City's Plans for NMRP with the Teston Road project.
43.	Coordination	Can YR provide an updated schematic showing key nodes/connection points to NMRP so that we can indicate on the plan			The Ultimate Preliminary Design Plans for Teston Road that are included in Appendix B of the EA Report (Sheets 4 to 8) show several potential connection points to NMRP for both active transportation and vehicle access.
44.	Coordination	Future-proofing (allow for curb-cut) for potential access roadway into the park			Future proofing for a potential access roadway into the NMRP will be reviewed at the detail design stage of the project.
45.	Coordination	We would like to continue discussing feasibility / futureproofing for grade-separated crossings across Teston			Provisions for grade separated active transportation crossings of Teston Road have been included within the area of the Don River West Branch valley. Further discussions regarding grade-separated crossings across Teston Road can take place at the detail design stage of the project.
46.	Coordination	Has the team done any public consultation with neighbouring communities or groups? If so, is it possible to share their findings?			There have been extensive opportunities for public input to the project over the course of the EA. No meetings have been requested by or taken place with specific neighbouring communities.



MATCH LINE - 2
 AT STATION - 1+437.00
 NEXT SHEET NUMBER: ###

- 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 TRACK
 - PROPOSED BOULEVARD
 - PROPOSED MEDIAN
 - PROPOSED BUS PAD
 - PROPOSED RETAINING WALL / PARAPET WALL
 - PROPOSED CONCRETE BARRIER



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.

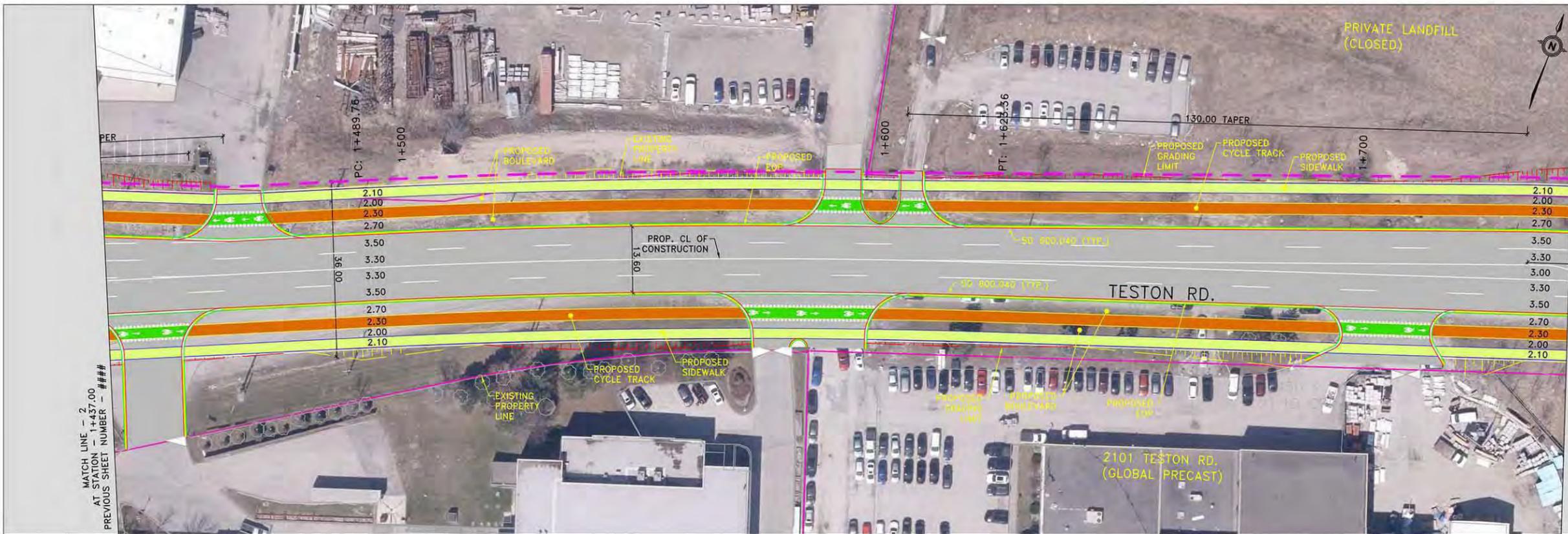


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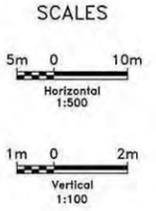
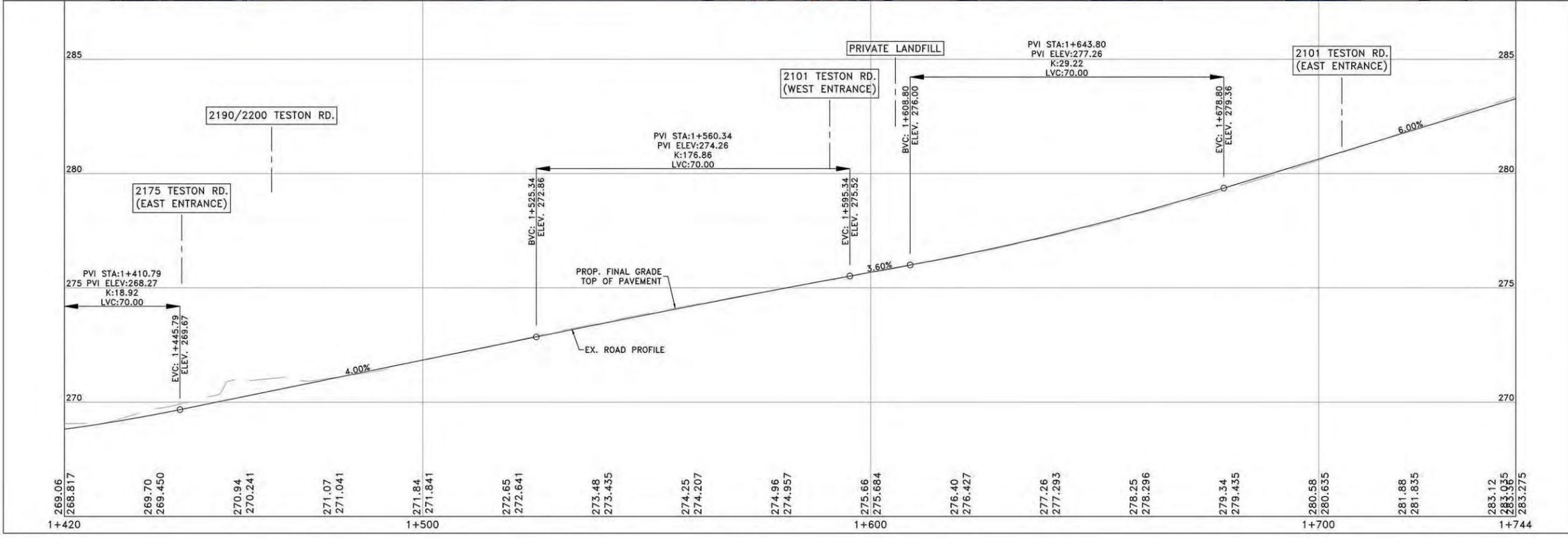
DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
DRAWN YG		CONT. NO.
CHECKED MPB	PRELIMINARY DESIGN-ULTIMATE 1+130 TO 1+437	SHEET NO. 2

ISSUED FOR XXXXXXXXXXXX <DATE>



MATCH LINE - 3
AT STATION - 1+744.00
NEXT SHEET NUMBER: ###

- LEGEND**
- EXISTING ROW AND LOT LINE
 - PROPOSED PROPERTY LINE
 - FUTURE DEVELOPMENT PARCEL
 - PROPOSED PERMANENT EASEMENT
 - PROPOSED TEMPORARY EASEMENT
 - PROPOSED C/A
 - PROPOSED GRADING FILL
 - PROPOSED GRADING CUT
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 - PROPOSED MEDIAN
 - PROPOSED BUS PAD
 - PROPOSED RETAINING WALL / PARAPET WALL
 - PROPOSED CONCRETE BARRIER



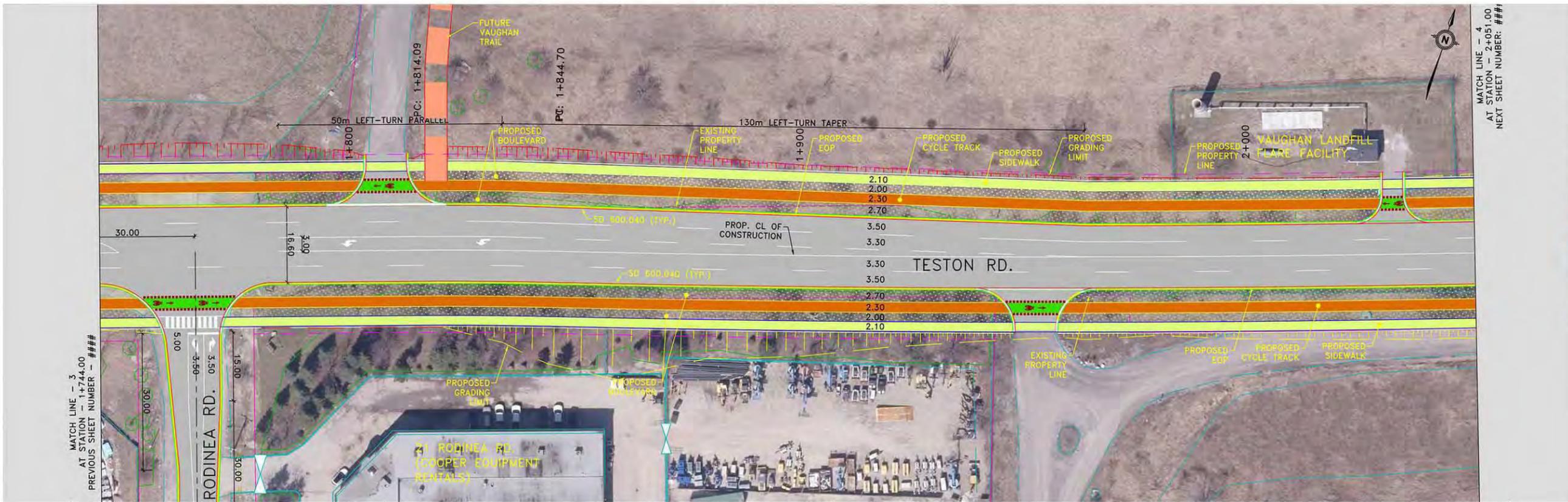
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MORRISON HERSHFIELD Stantec	No.	DATE	REVISIONS	BY

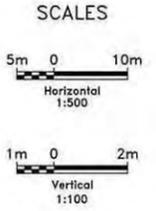
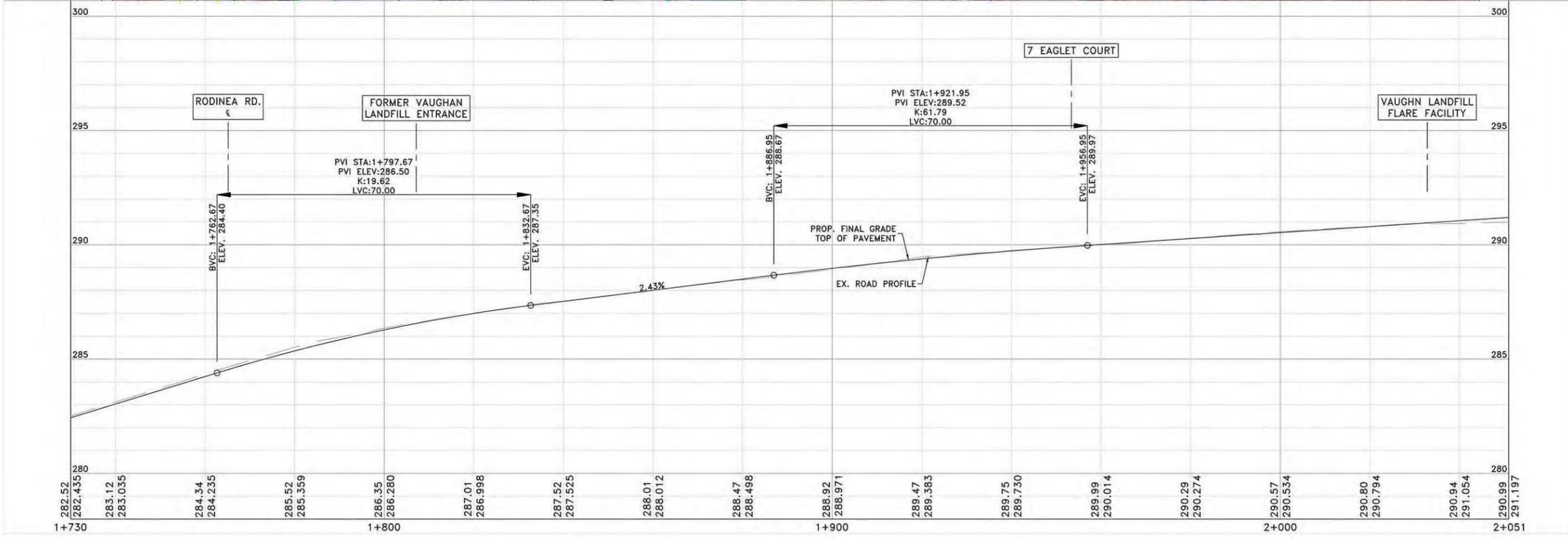
Public Works Transportation

DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
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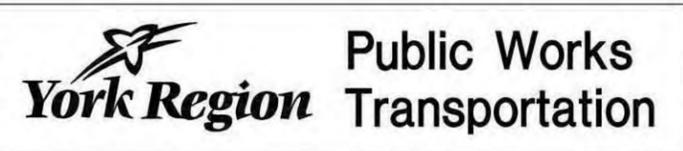
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 - PROPOSED MULTI-USE PATHWAY
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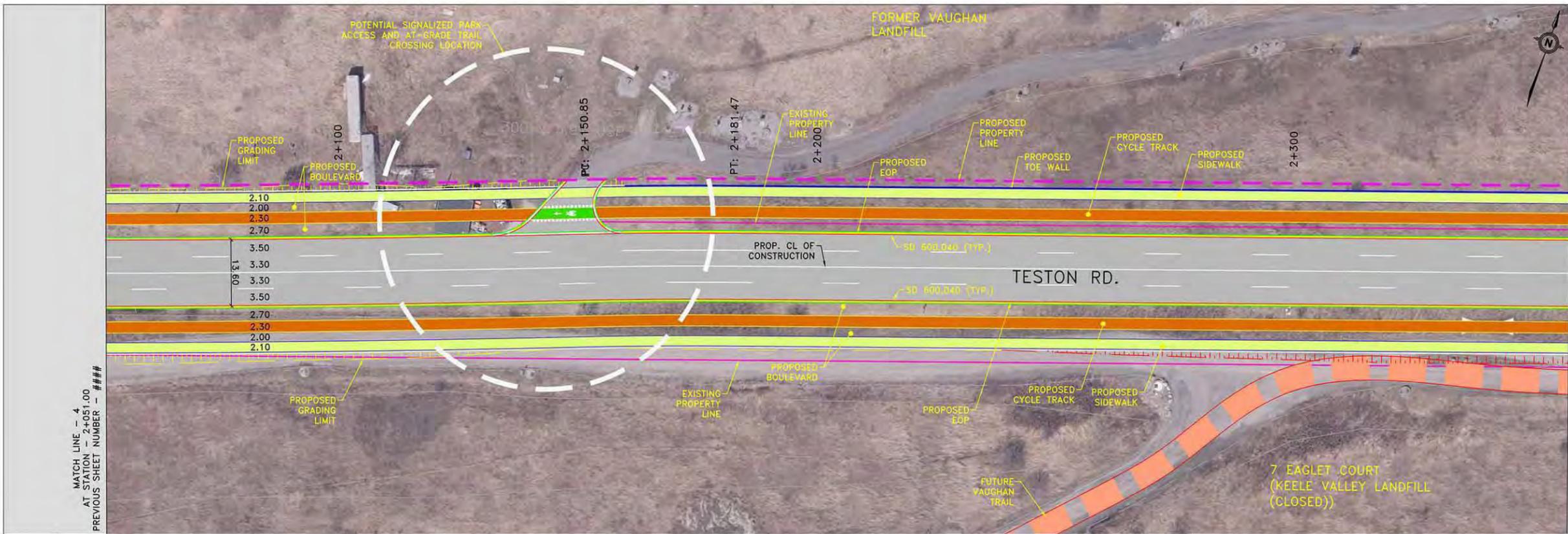


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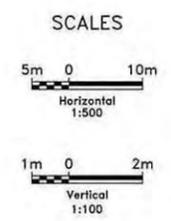
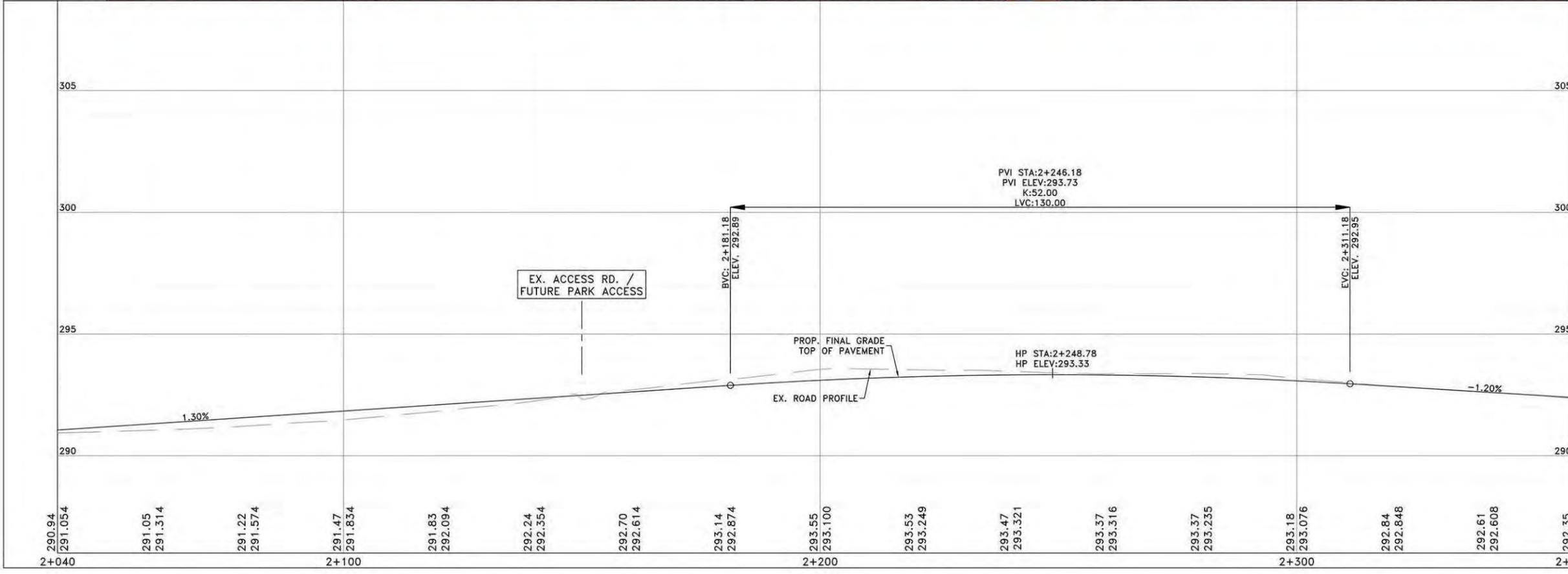
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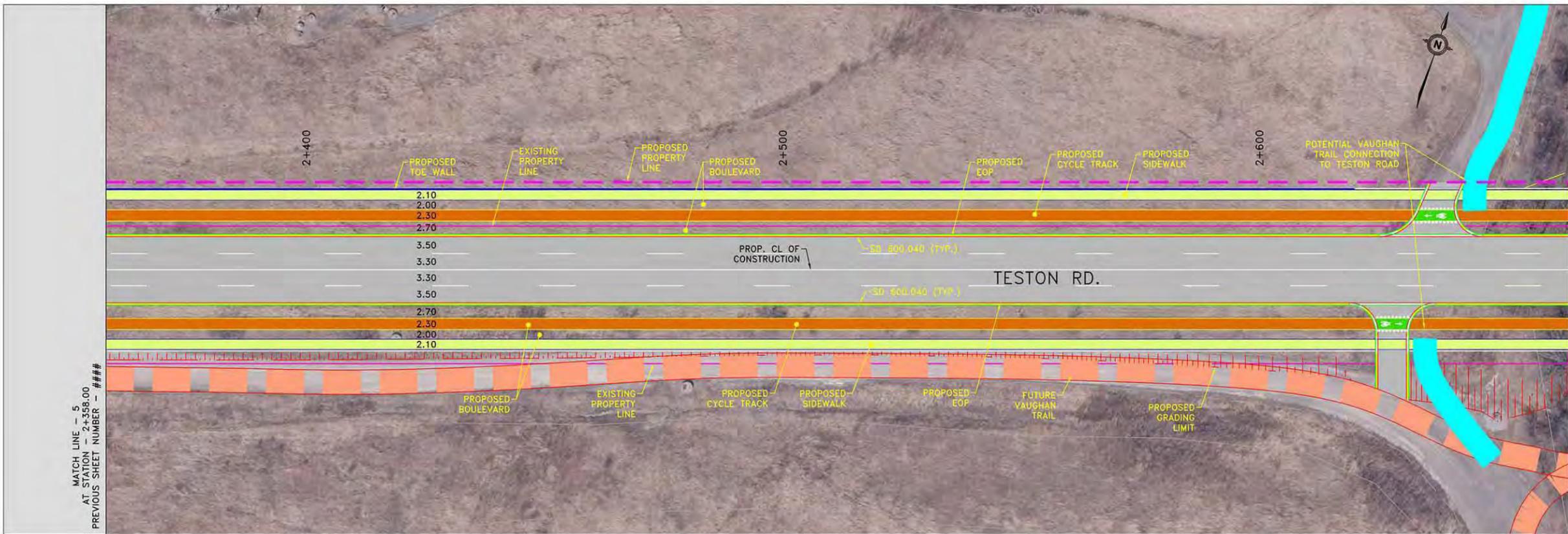


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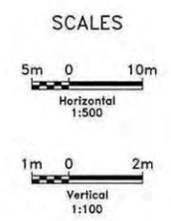
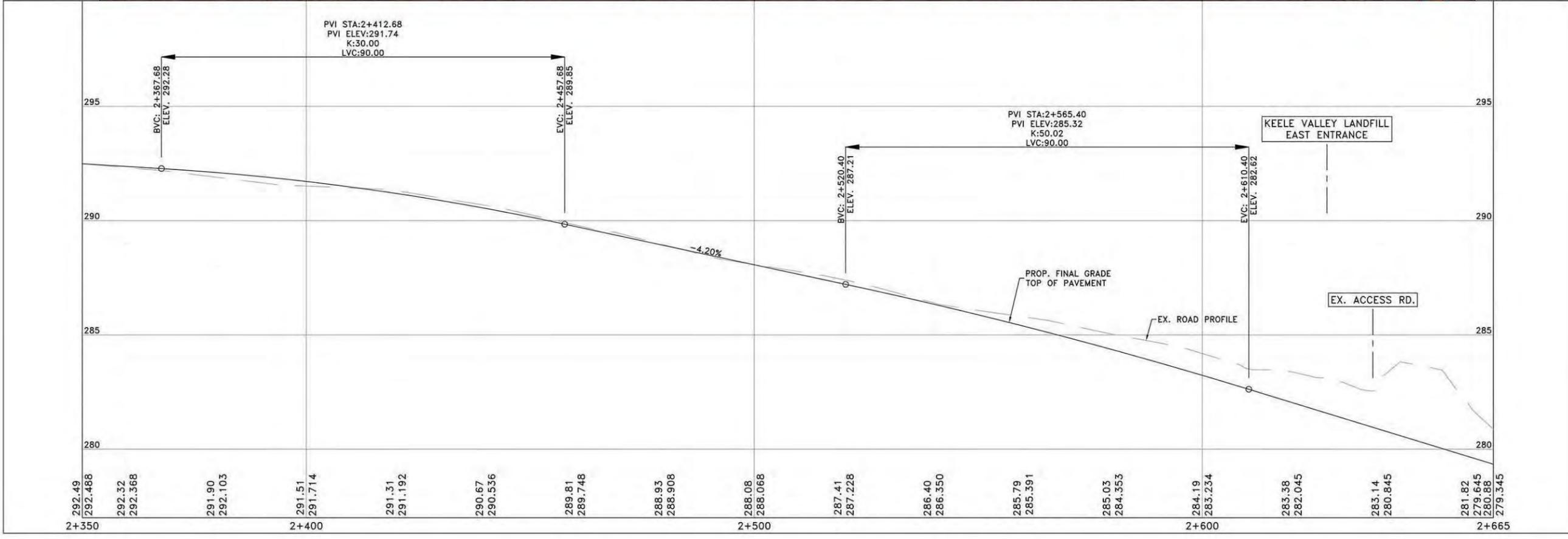
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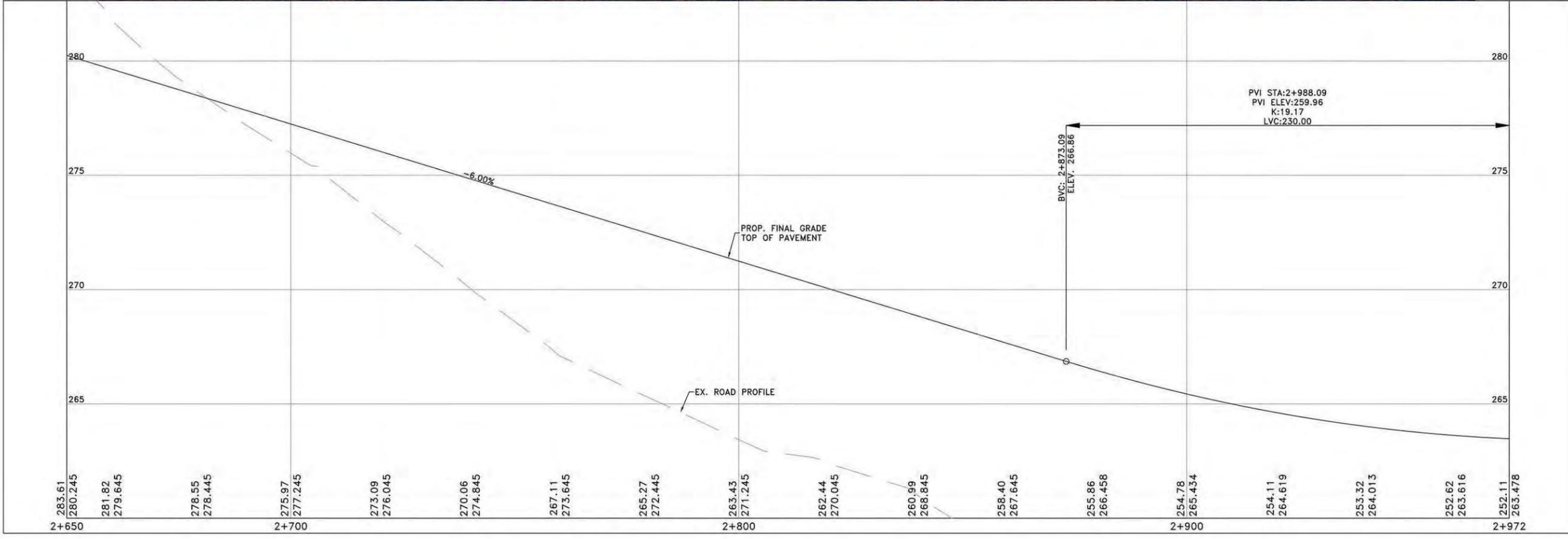
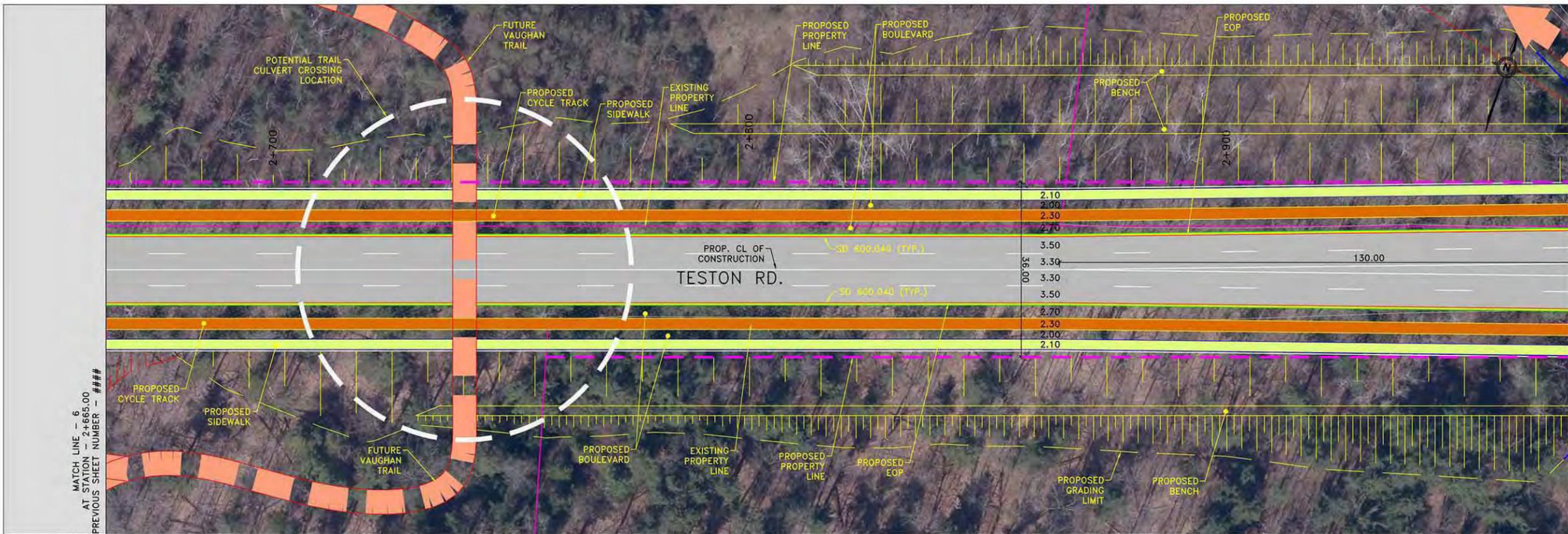
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MORRISON HERSHFIELD Stantec	No.	DATE	REVISIONS	BY

York Region
Public Works Transportation

DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
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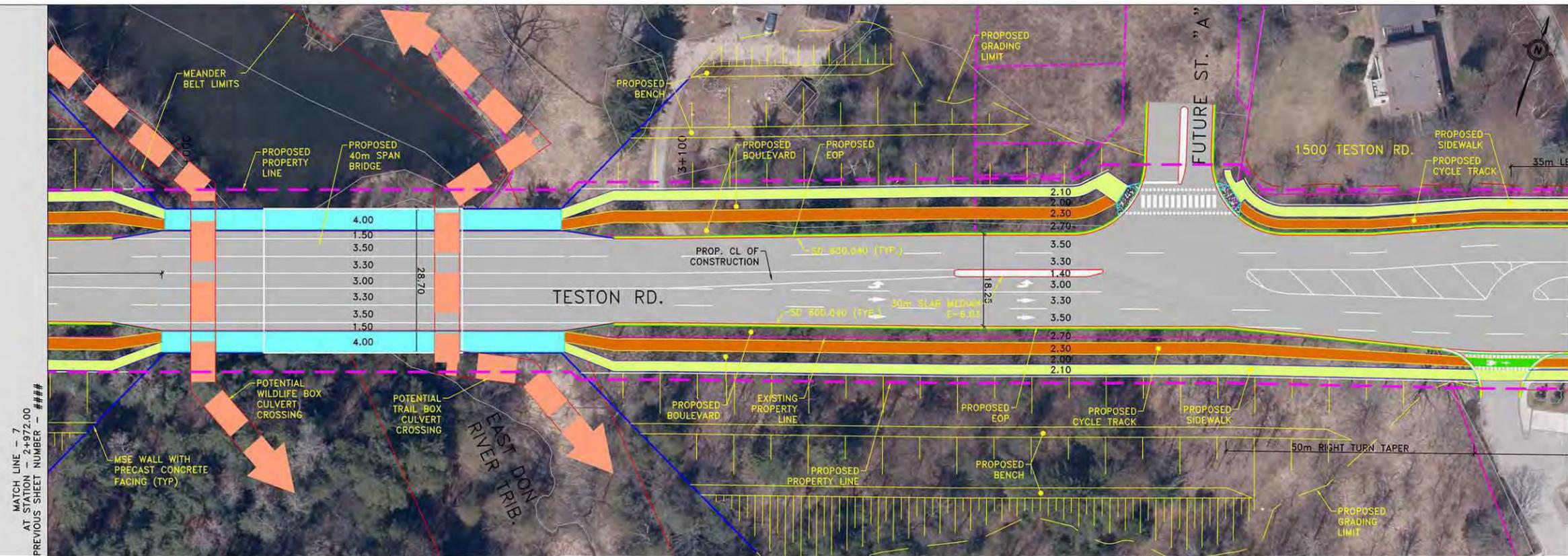


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DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
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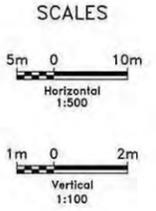
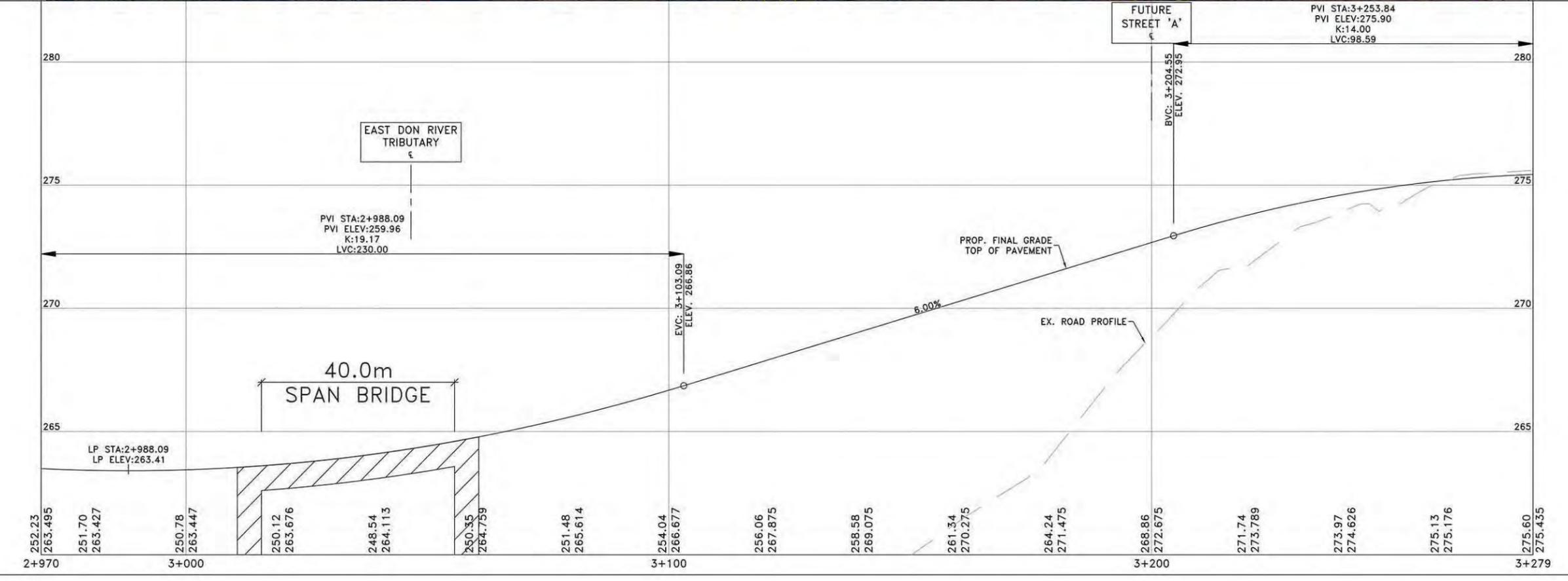
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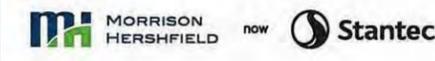
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PREVIOUS SHEET NUMBER - ###

MATCH LINE - 8
AT STATION - 3+279.00
NEXT SHEET NUMBER: ###



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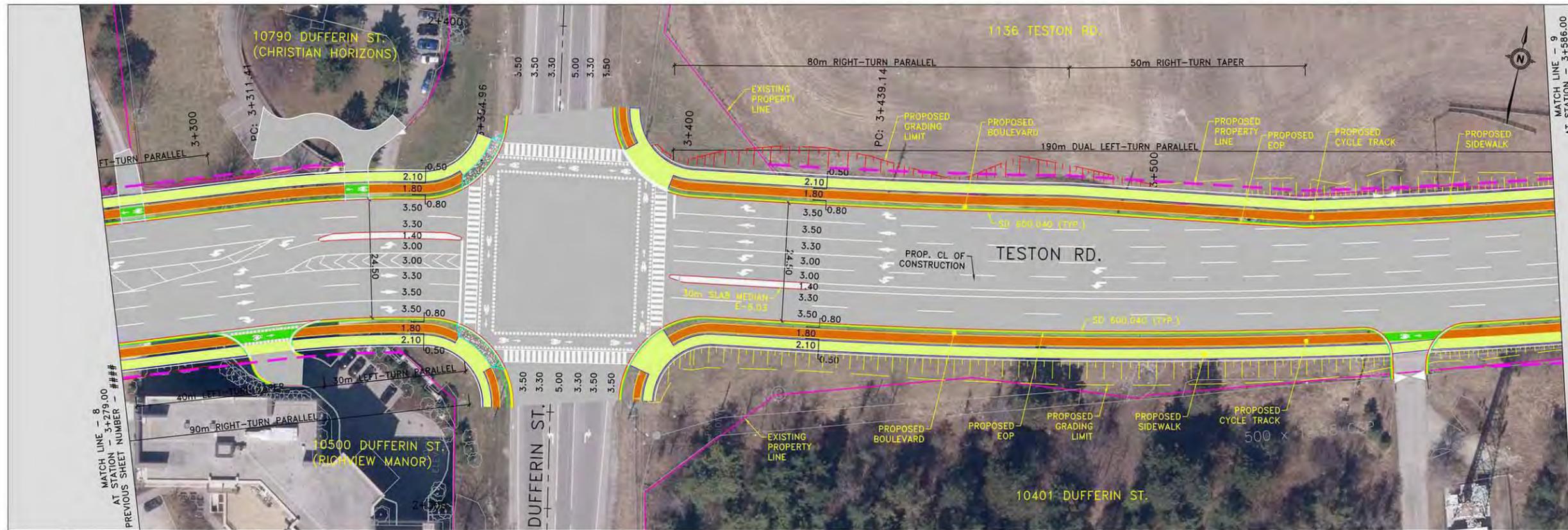


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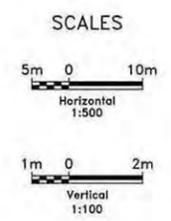
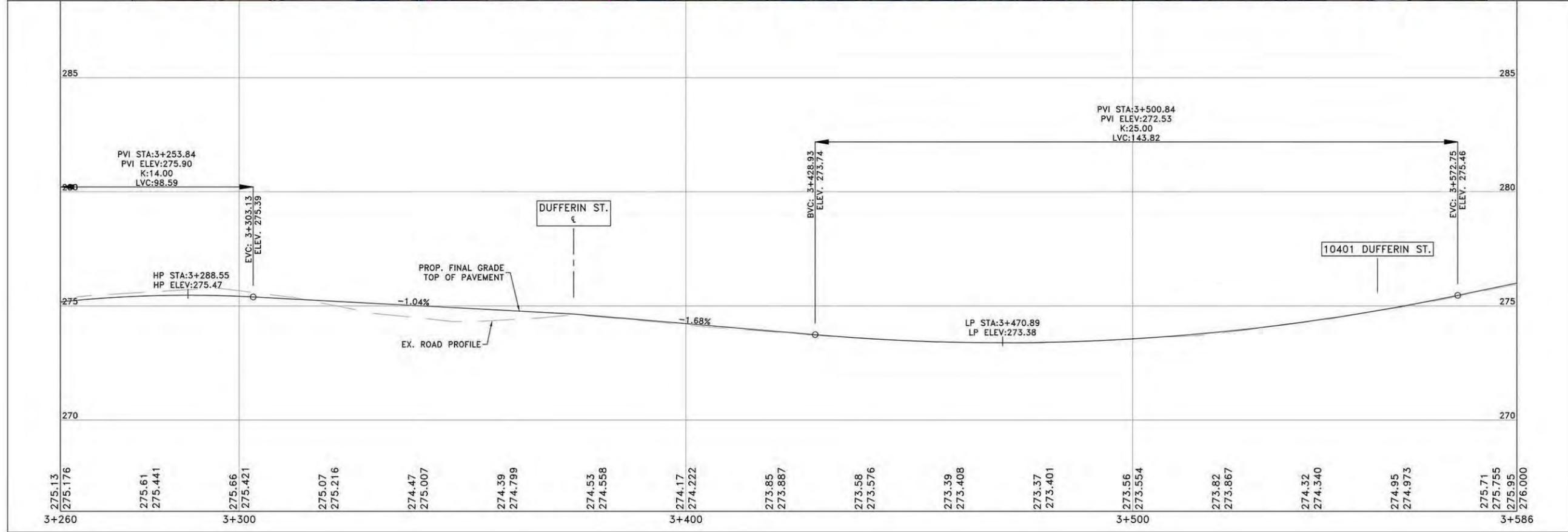


DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
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DESIGN MPB	TESTON ROAD (Y.R. 49) RECONSTRUCTION FROM KEELE STREET (Y.R.6) TO BATHURST STREET (Y.R.38)	DWG. NO.
DRAWN YG		CONT. NO.
CHECKED MPB	PRELIMINARY DESIGN-ULTIMATE 3+279 TO 3+586	SHEET NO. 9

ISSUED FOR XXXXXXXXXXXX <DATE>

**APPENDIX E-3 – Toronto & Region
Conservation Authority**

December 20, 2024

CFN 57571

BY E-MAIL ONLY (praveen.john@trca.ca)

Praveen John
The Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6 Z1

Dear Praveen John,

**Re: Draft Environmental Study Report (ESR)
Teston Road Area Improvements – Highway 400 to Bathurst Street
Individual Environmental Assessment (IEA)**

These comments respond to the Draft Environmental Study Report (ESR) received by Toronto and Region Conservation Authority (TRCA) on November 8, 2024.

OVERVIEW

This project involves an analysis of a range of alternatives to address transportation capacity challenges within the study area bounded by Highway 400 to Bathurst Street, and Major Mackenzie Drive to Kirby Road including a link between Dufferin Street and Keele Street through the unopened road allowance. TRCA recognizes that the project needs were identified through the York Region Transportation Master Plan which proposes construction of a 4-lane missing link between Dufferin Street and Keele Street and associated Teston Road widening to 4-lanes.

Staff understands that the study is recommending an extension to Teston Road across the unopened road allowance between Dufferin Street and Keele Street including a bridge over East Don River Tributary. The proposed improvements include 36.0 m right-of-way (RoW), 4-lanes, and 3.0 m multi-use path (MUP) with trail connection to Vaughan Super Trail. New pedestrian/cycling facilities, wildlife crossing culvert and transit service/routes along the corridor from Keele Street to Bathurst Street are also proposed. At-Grade GO Rail Crossing is recommended as part of the improved Teston Road alignment.

As noted in the draft IEA, the Block 27 Secondary Plan is within the Teston Road IEA study area. TRCA has reviewed the Upper West Don Subwatershed/Block 27 Secondary Plan finalized in 2018. TRCA reviewed the MESP and provided comments

on April 12, 2024. TRCA has also been involved in reviewing the Block 27 Collector Roads Municipal Class Environmental Assessment (MCEA).

A listing of documents reviewed is included/provided in Appendix A: Documents Reviewed by TRCA.

TRCA REVIEW

Staff have completed the review of this submission and have several comments that will need to be addressed. Staff suggests a meeting to discuss the comments as enclosed in Appendix B: TRCA Comments and Proponent Responses.

RESUBMISSION REQUIREMENTS

Follow the [TRCA Digital Submission Requirements for Environmental Assessment Documents](#) to ensure all required information is provided in future submissions.

Should you have any questions or comments, please contact the undersigned.

Regards,



Harsimrat Pruthi

Senior Planner

Infrastructure Planning and Permits | Development and Engineering Services

Telephone:

Email: harsimrat.pruthi@trca.ca.

/HP

Attached: Appendix A: Documents Reviewed by TRCA

Appendix B: TRCA Comments and Proponent Responses

Enclosed: Appendix B: TRCA Comments and Proponent Responses WORD digital file for consultant/proponent response purposes

BY E-MAIL

cc: York Region: Joel Smith, Environmental Specialist

MH: Nick Crockford, Environmental Planner

TRCA: Suzanne Bevan, Senior Manager

APPENDIX A: DOCUMENTS REVIEWED BY TRCA

DOCUMENTS REVIEWED

1. Notice of Public Review Teston Road Area IEA City of Vaughan; prepared by York Region; received by TRCA November 8, 2024;
2. Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street – Draft Report (360 Pages); dated August 15, 2024; prepared by Stantec; received by TRCA November 8, 2024;
3. Appendix A – Terms of Reference; Teston Road Area Transportation Improvements – Individual Environmental Assessment Terms of Reference; dated June 2018 as Amended October 2018; prepared by WSP; received by TRCA November 8, 2024;
4. Appendix B – Preferred Design Plans (Interim & Ultimate) Including Interim Landscape Design (33 Pages); Teston Road Reconstruction from Keel Street to Bathurst Street; prepared by Stantec; received by TRCA November 8, 2024;
5. Appendix C .1 to C.7 – Consultation Record and Appendix C.8 – Indigenous Consultation Record; Teston Road Area IEA; prepared by Stantec; received by TRCA November 8, 2024;
6. Appendix D – Transportation Memos No. 1; Teston Road Area Transportation Improvements Individual Environmental Assessment - Transportation System Technical Report # 1; dated February 12, 2021; prepared by Morrison Hershfield; received by TRCA November 8, 2024;
7. Appendix D – Transportation Memos No. 2; Teston Road Area Transportation Improvements Individual Environmental Assessment - Transportation System Technical Report # 2; dated October 18, 2024; prepared by Morrison Hershfield; received by TRCA November 8, 2024;
8. Appendix D – Transportation Memos No. 3; Teston Road Area Transportation Improvements Individual Environmental Assessment - Transportation System Technical Report # 1; dated February 12, 2021; prepared by Morrison Hershfield; received by TRCA November 8, 2024;
9. Appendix E - Part 1 and 2 – Draft - Natural Environment Report : Individual Environmental Assessment for Teston Road Area (Y.R. between Highway 400 and Bathurst Street (Y.R.38)); dated July 2024; prepared by Stantec; received by TRCA November 8, 2024;
10. Appendix F – Part 1 to 4; Arborist Report - Individual Environmental Assessment of the Teston Road Area (Y.R.49) between Highway 400 and Bathurst Street (Y.R.38); dated March 14, 2023; prepared by Stantec; received by TRCA November 8, 2024;
11. Appendix I - Stage 2 Archaeological Assessment Report - Teston Road - Highway 400 to Bathurst Street Individual Environmental Assessment; dated March 11, 2024; prepared by ASI; received by TRCA November 8, 2024;
12. Appendix J – Cultural Heritage Assessment Report – Final Report: Existing Condition and Preliminary Impact Assessments – Teston Road from Highway 400 to Bathurst Street; dated August 2020 (updated May and July 2024); prepared by ASI; received by TRCA November 8, 2024;

13. Appendix K – Part 1 to 5; Teston Road Area Transportation Improvements Individual Environmental Assessment - Drainage and Stormwater Management Report; dated July 5, 2024; prepared by Stantec; received by TRCA November 8, 2024;
14. Appendix L – Hydrogeology Report - Teston Road Area Transportation Improvements Individual Environmental Assessment; dated April 8, 2024; prepared by Stantec; received by TRCA November 8, 2024;
15. Appendix M - Part 1 to 6; Contamination Overview Study - Teston Road Area Transportation Improvements Individual Environmental Assessment; dated October 22, 2024; prepared by Morrison Hershfield; received by TRCA November 13, 2024;
16. Appendix N Parts 1 to 8; Phase 1 Environmental Assessment Reports; received by TRCA November 13, 2024;
17. Appendix O – Soil Investigation Report - Teston Road Area Transportation Improvements Individual Environmental Assessment; dated April 8, 2024; prepared by Stantec; received by TRCA November 8, 2024;
18. Appendix P – Fluvial Geomorphology Report - Teston Road Extension IEA Fluvial Erosion Hazard Study – Draft Report; dated June 16, 2023; prepared by Geo Process Research Associates; received by TRCA November 8, 2024;
19. Appendix Q – Climate Change Report - Climate Change Assessment Report Individual Environmental Assessment for Teston Road Area – Draft - Improvements (Highway 400 to Bathurst Street); dated August 13, 2024; prepared by Stantec; received by TRCA November 8, 2024;
20. Appendix R.1 and R.2 – Pavement Design Report - Teston Road from Keele Street to Bathurst Street – Final Report; dated September 25, 2023; prepared by WSP; received by TRCA November 8, 2024;
21. Appendix S – Structural Design Report – East Don River Tributary Crossing – 40 m Span Bridge - Individual Environmental Assessment for Teston Road Area (Y.R. 49) between Highway 400 and Bathurst Street (Y.R. 38); dated June 30, 2024; prepared by Stantec; received by TRCA November 8, 2024;
22. Appendix T – Evaluation Table for Alternative Methods - York Region - Teston Road Area Improvements IEA - Evaluation of Alternatives to the Undertaking; dated May 17, 2021; prepared by Morrison Hershfield; received by TRCA November 8, 2024;
23. Appendix U – Evaluation for Alternative Designs - York Region Teston Road Area Improvements IEA -Evaluation of Alternative Methods Section 1 – Teston Road / Keele Street Intersection and Teston Road / GO Rail Crossing; dated February, 2022; prepared by Morrison Hershfield; received by TRCA November 8, 2024;
24. Appendix V – Design Criteria for Transportation Projects; dated November 22, 2021; prepared by York Region; received by TRCA November 8, 2024.

APPENDIX B: TRCA COMMENTS AND PROPONENT RESPONSES

ITEM	DISCIPLINE	TRCA COMMENTS (December 20, 2024)	PROPONENT RESPONSES
1.	General	Note that section 5.2.5.3, and any other sections that reference TRCA's previous regulation (O. Reg. 166/06), should be updated to reference O. Reg. 42/24.	
2.	Planning	Staff recommends exploring options for the proposed bridge to be appropriately sized to better address TRCA comments, and to avoid or minimise any impacts from the proposed grading and fill in the valley and hardening of watercourse banks.	
3.	Planning Ecology	As discussed previously, for the proposed crossing, staff would like to note that the proposed 40 m bridge span does not seem appropriate for this valley due to the substantial width at 556m and a wetland throughout the valley and within the road alignment. Provide a memo outlining how the proposed bridge span meets TRCA's Stream Crossing Guideline would be helpful. The memo to also provide a comparison between the preferred 40 m span, a larger span (with piers, as appropriate) mentioned in Comment #2 and the evaluated option of 80 m span with piers.	
4.	Planning Ecology	It also appears that the proposed 40 m span would require a channel realignment and further in-water works, which might be avoided through a much larger bridge span (refer Comment #3) and does not appear to meet TRCA's Stream Crossing Guidelines.	
5.	Planning Ecology	Staff notes that the permanent habitat losses associated with the limit of the fill in the valley and the road embankment slopes is unclear. Provide a memo outlining the types and amounts of habitat losses, especially in the wetland, associated with the proposed works. While the L ranks of the community losses have been provided; however, also provide the types of habitats. This also to be completed as part of the memo referred in Comment #3.	
6.	Water Resources	Note that Table 5: Summary of Peak Flows at Crossings (Existing) in the Drainage and Stormwater Management Report has incorrect flows for crossing ED01. Further, the HecRAS cross-sections have different numbering than	

		TRCA's current hydraulic model, so it appears that the most recent version of the modelling has not been used. This is particularly important as the current Regional flow in the location of ED01 is 41.74 cms which is larger than the 36.87 cms. Contact TRCA for the most recent version of the modelling and add the proposed crossing to demonstrate there are no negative impacts to flooding.	
7.	Water Resources	Provide a digital version of the HecRAS modelling (once the current modelling has been updated) for review.	
8.	Water Resources	Table 14: Stormwater Management Detention and Retention Requirements in the Drainage and Stormwater Management Report provides some details surrounding the required storage volumes needed, however, further details are required to demonstrate what the proposed release rates are, how they compare to the UFR and post-to-pre targets and demonstrate that required volumes can be feasibly provided in the space available.	
9.	Water Resources	Include the hydrology modelling for the 2 yr storm to demonstrate the target release rates are being achieved.	
10.	Water Resources	The fluvial geomorphological study notes that the meander belt width is 43.1 m and the proposed bridge span was 80 m. As the proposed span for ED01 is now 40 m, provide an opinion on the proposed span by the Fluvial Geomorphologist. Further, consideration should be given to the trails and wildlife crossings at this location and if a larger bridge would be more appropriate to allow for all proposed uses of this structure.	
11.	Geotechnical Engineering	As per the grading plan (Appendix B- Preferred Design Plan), staff understands that portions of the slopes/areas north and south of Teston Road will be regraded. The proposed grades (and regraded slope inclinations) are not shown on any of the plans. Ensure in the final plans that the regraded slope inclinations are clearly depicted. Further, include cross-sections that illustrate the proposed grades with respect to the existing grades. Submit the final grading plans.	
12.	Geotechnical Engineering	As per the preliminary foundation report (Appendix R2), it is understood that global stability analyses were carried out for conceptual RSS walls. As stated in the report, the global stability will be re-evaluated once the design is	

		finalized. Submit the final foundation report and ensure the global stability reassessment is included in the final report.	
13.	Geotechnical Engineering	Submit the final engineering drawings of the proposed trails, multi-use pathways, proposed bridge, MSE walls, culverts, (and any other proposed structures). Note that the engineering drawings should be signed and sealed by a licensed Professional Engineer.	
14.	Hydrogeology	<p>Figure 7: Approximate Locations of Landfill Monitoring Systems and Chloride Plume Extent shows three aquifers (i.e., Upper Aquifer, Intermediate Aquifer, and Lower Aquifer) from which groundwater samples were collected. However, Section 3.4 Hydrogeology in the Hydrogeology Study did not provide any description of these three aquifer systems and their regional and site-specific spatial and vertical extents. The aquifer systems at the project area need to be presented in more detail with regional and site-specific extents and stratigraphic cross-sections, site-specific lithology and stratigraphic heterogeneity and borehole logs, aquifer types, connections within the aquifers, presence of regional and site-specific aquitards, local and regional production aquifers, water level distributions, seasonal variations of water levels, interactions with nearby surface water features, and extent of chloride plumes in the aquifer systems.</p> <p>A discussion is also required to highlight the portions of the aquifer systems, which are vulnerable and can be easily impacted due to the proposed infrastructure development and associated activities.</p>	
15.	Hydrogeology	Based on the sensitivity of the project, the hydrogeological report should have provided detailed dewatering information regarding the area where dewatering is required, dewatering methods, the invert depth, the required drawdown for dry working condition, dewatering rate/volume, dewatering time frame, the aquifer to be dewatered, zone of influence due to dewatering, dewatering discharge options, dewatering impact on the water resources including the PSW, unevaluated wetlands, Don River Tributary and landfill monitoring programs and other water users, possible impact on chloride plumes (and VOCs plumes) distributed within the groundwater in the project area.	

		<p>The hydrogeological report needs to provide a discussion regarding the additional hydrogeological assessment, if required, and monitoring requirement/contingency plan that will ensure that the sensitive receptors will not be impacted due to dewatering activities. Groundwater monitoring is also required to ensure that the dewatering does not affect the existing landfill monitoring, purging and management activities and ensure that the existing chloride plumes in these three landfills will not impact clean aquifers due to migration of impacted plumes during dewatering.</p> <p>Also clarify how the protections of the permit to take water (PTTW) or environmental activity site registry (EASR) system are sufficient to mitigate potential impacts on the sensitive receptors described above. As the dewatering volume and associated dewatering impacts are unknown and based on site sensitivity, MECP may require a Category 3 PTTW permit, which requires detailed hydrogeologic investigations and impact assessments.</p>	
16.	Hydrogeology	<p>It is noted that “the entire study area falls within the WHPA-Q1 (for the York-Durham Municipal wells, Map 3.4 in the SPP). Other than minor and temporary water taking that may be required for construction dewatering, the proposed work is not an activity that may take water without returning it to the same source. As such, none of the SPP policies that would be triggered by WHPA-Q1 (specifically, DEM-1, DEM-2, DEM-3, DEM-4, DEM-9, and DEM-10, see the Section 10 of the SPP) result in any EA commitments”.</p> <p>Staff notes that dewatering requirements, dewatering rates and associated impacts due to dewatering on sensitive receptors are not evaluated or known; therefore, the proposed dewatering cannot be regarded as minor dewatering. Similarly, it is not known whether the actual dewatered volume of groundwater will be returned to the same source aquifer.</p> <p>Due to the poor groundwater quality as described in Section 3.6.3 Water Inspection and Sampling, it is unknown whether the extracted groundwater during dewatering, if any, can be returned to the same source. A discussion of possible dewatering discharge plan is required.</p>	
17.	Hydrogeology	<p>The shallow groundwater levels at or above ground surface as per Section 3.4.2 Groundwater and Section 3.6.1 Groundwater Monitoring are not</p>	

		<p>consistent with the distribution of water level data provided in Section 3.4.2. Figure 7 that shows potentiometric contours ranging in elevation from 260 masl on the north to 235 masl on the south/southeast with a difference in water level of 25 m.</p> <p>The water table across the entire project area is shown in Cross Section AA' on Figure 6 in Appendix A. However, it is not known when and from which aquifers these water level data were collected. No information is provided regarding the aquifer, which represents these potentiometric contours in Figure 7. No borehole logs were provided to understand the screen intervals and location of screens (i.e., A22-2 and C1) within the aquifer systems. Revise the appropriate reports to include the details.</p>	
18.	Hydrogeology	<p>Section 3.4.3.1 Wellhead Protection Area notes the entire study area falls within the WHPA-Q2 (also for the York-Durham Municipal wells, Map 3.4 in the SPP). It notes that the only SPP policy triggered by WHPA-Q2 is REC-1, which is to be implemented by the Planning Approval Authority. As noted in the report, the most applicable part of the policy that applies will be for applications under the Planning Act within the Tier 3 Water Budget WHPA-Q2.</p> <p>Section 5.5 notes that the project will not result in an application under the Planning Act, and, as such, the above policy is not applicable. It is noted, however, that the project will incorporate “best management practices such as low impact development (LID)”. Caution is required to ensure that any infiltration of potentially salt-impacted road runoff does not interfere with the monitoring of the landfills in the area”.</p> <p>However, the best management practice in LID requires pre and post development water balance study. Based on the project area sensitivities, a more detailed hydrogeologic impact assessment compared to those limited scope water balance required for LID is required, where evaluation of groundwater recharge and changes in groundwater levels, interaction between groundwater and surface water, changes in discharge/seepage to sensitive water features, if any, may be an important part of the hydrogeologic impact assessment.</p>	

19.	Hydrogeology	As noted in Section 4.2.3 Natural Environment in the approved Terms of Reference, dated June 2018, amended October 2018, provide details of wetland and the possible impacts of the proposed works.	

Review of Responses to TRCA Comments on Draft YR Teston Road Area EA Report

Project/File: York Region Individual / Comprehensive Environmental Assessment and Preliminary Design for Teston Road Area between Highway 400 and Bathurst Street (P-19-218)
Date/Time: June 23, 2025 / 11:00 am – 12:00 pm
Location: MS Teams
Next Meeting: n/a
Attendees: Billy Cheung (York Region (YR), PM), Maria Banayoty (YR, Project Coordinator), Praveen John (YR, Engineering Manager), Joel Smith (YR, Environmental Specialist), Harsimrat Pruthi (TRCA, Senior Planner), Suzanne Bevan (TRCA, Senior Manager for Infrastructure, Planning and Permits), Maria Parish (TRCA, Senior Planning Ecologist), Abdul Djirdeh (TRCA, Geotechnical Engineer), Salah Sharif (TRCA, Senior Hydrogeologist), Matthew Kuyntjes (TRCA, Senior Water Resource Engineer), Andrew Harkness (Stantec, PM), Meghan MacMillan (Stantec, Environmental Planner), Martin Blouin (Stantec, Deputy PM & Design Lead), Ant West (Stantec, Contamination / Waste & Groundwater Lead), Victor Do (Stantec, Water Resources Engineer)
Absentees: Alison MacLennan (TRCA)
Distribution: Distribution List

Item:	Action:
Introductions Meeting attendees provided an introduction.	
Project Status Update <ul style="list-style-type: none"> • Billy Cheung (BC) provided high-level project updates. YR is completing a final round of consultation with review agencies prior to finalizing the Comprehensive Environmental Assessment (EA) report. <ul style="list-style-type: none"> ○ Stantec & YR met with the City of Vaughan last week and will meet with the City of Toronto and Ministry of the Environment, Conservation and Parks (MECP) to review responses to agency review comments. ○ YR is aiming to file final reports with MECP by the end of summer, if not sooner. The Detail Design assignment has been tendered; an RFQ has been evaluated but award is on hold until EA is finalized. Anticipate Detail Design will start this fall. • BC noted the construction is slated to start in 2030 in accordance with the Region's latest 10-year Roads and Transit Growth Capital Program. AH clarified 2030 is for construction of Keele to Dufferin segment (not Dufferin to Bathurst). • AH noted that public and agency review produced good, detailed feedback. Stantec has made several updates to reports. All review 	

Item:	Action:
<p>comments and meeting minutes will be included with final EA report to demonstrate transparency in how reports were updated.</p>	
<p>Open Discussion of Comments</p> <ul style="list-style-type: none"> • Harsimrat Pruthi (HP) noted the primary issue the TRCA wanted to discuss is the bridge span length. • AH explained the recommendation is for a 40-45 m bridge. Martin Blouin (MB) shared valley crossing plan drawings and bridge general arrangement (GA) drawings (copies attached). <ul style="list-style-type: none"> ○ MB explained the design team intention was to minimize encroachment in the valley, by keeping the roadway profile as low as possible. Embankment slopes and benching required are significant; however, they will be revegetated. As part of bridge design, 20 m long (parallel to roadway) retaining wall structures are included on each side. Fill areas are required on each side of bridge structure. ○ MB shared the GA for the recommended bridge option (40 m clear span between abutment faces). The footprint of the structure and embankments within the valley is approx. 31,145 m² including wingwalls with 441 m² of open area under bridge. The bridge is well above the minimum height for adequate conveyance. ○ MB compared the 40 m span to the 80 m span concept. With the 80 m span option, the abutments are shifted to the west and east. The total footprint (29,685 m²) is reduced by 1,460 m² or approx. 5% vs. the 80 m span option. There is an expanded opening under the bridge (increasing to 736 m²). The 45-degree wingwalls remain as with the 40 m span option. ○ AH noted that the 40 m bridge option has a potential wildlife culvert on the west side. ○ Additionally, benched areas are provided in front of the abutments (under both options) for potential future active transportation / trails. • HP asked whether options between 40 and 80 m span lengths were considered (e.g., 60 m)? <ul style="list-style-type: none"> ○ AH: other span arrangements are possible but were not assessed in detail. ○ Praveen John (PJ) noted the span is not fixed at 40 m. YR remains open to some adjustments. The span is primarily being driven by type of girder (40 m is a more common size) and keeping costs lower. • Suzanne Bevan (SB): the TRCA was looking to see comparison of options. The shorter 40 m span is not ideal, considering that previously YR was talking about a larger span. The TRCA understands the need to look at costs of the structure. Does a 60 m or 55 m span, for example, address all of the TRCA's crossing criteria guidelines (without substantial increases in cost for YR)? Was a meander belt analysis completed? <ul style="list-style-type: none"> ○ An analysis of the meander belt was completed. The calculated meander belt of 43.1 m, which includes approx. 17 m factor of safety, is a bit constrained in this area but is well beyond what is 	

Item:	Action:
<p>required hydraulically. PJ noted that the watercourse has very limited flow most of the time (i.e. a bankfill width of approx. 1.2m).</p> <ul style="list-style-type: none"> ○ PJ noted that YR can fine tune the span during Detail Design. The channel is not defined due to the presence of the on-line artificial pond; it is based on where the dam is located, and pond's containment slopes are failing. YR sees this as an opportunity to clean up this area. These refinements will be considered further during Detail Design. ● SB: has an RFP gone out for the Detail Design assignment? <ul style="list-style-type: none"> ○ PJ: yes, however the work is on pause. ○ SB: the TRCA is looking for the opportunity to have discussions on these matters during the Detail Design phase. The TRCA is not looking to change the recommended design to an 80 m span; the objective is to follow as best as possible the TRCA's guidelines and regulations and to be answerable to the public if there are questions about the decision-making process. ● Maria Parish (MP): I do not see anything with respect to the developer's storm outfall channel on the northeast side of bridge (servicing has been completed). The embankment slopes as shown go right over the development's embankment channel. How will this be dealt with? <ul style="list-style-type: none"> ○ AH explained that YR and Stantec have had a lot of dialogue with the adjacent developer, including sharing of drawings and plans. More coordination with the developer will be required. Initially, YR expected a much larger time gap between implementation of the development and bridge construction. Now that the construction of the bridge is accelerated, this may require some modifications. ○ PJ explained that there is language in YR's RFP stating that the design is to match elevations as proposed by the adjacent developer. PJ noted the plans provided by the developer previously were preliminary in nature. During the Detail Design stage, YR will continue discussions with the developer and the Region's Development Engineering group. ○ MP clarified that the outfall has been built and that houses have been constructed. The outfall channel goes right through the embankment bench. PJ confirmed that the benching of the slope and wing walls on private property will be adjusted if necessary and that updated surveys will be completed. ● Matthew Kuyntjes (MK) noted he was relaying comments from Alison MacLennan. Based on a review the design from the TRCA's crossing guideline perspective, the hydraulic capacity has been met (according to Stantec), but the meander belt width not quite adequate. Are there opportunities for treatment of the foreslope that can be considered? <ul style="list-style-type: none"> ○ AH confirmed there will be more opportunities during Detail Design to refine these details. ○ MK: will this be stated in EA as a commitment to be revisited during Detail Design? 	

Item:	Action:
<ul style="list-style-type: none"> ○ PJ: confirmed that YR can review and optimize the bridge span width during Detail Design but would prefer to keep it as a single span. ● MK: What kind of impacts does 40 m span show in terms of flooding private land? TRCA is looking for no flood increase. <ul style="list-style-type: none"> ○ AH noted that any water level back up will occur in the ravine, and that there is no expected flood risk. ● MK noted the summary peak flow crossings look to have different numbering than the current model. Can Stantec confirm the current model was used? <ul style="list-style-type: none"> ○ AH stated that modeling was conducted earlier in the study (HEC-RAS modelling was completed based on the model version received on October 29, 2021) and that no further modelling is planned as part of this EA, but further review will be required during Detail Design. ○ MK wanted to confirm the correct model has been used, not leaving too much for Detail Design. ○ PJ added that the catchment area is very small, with little flow. 	
<p>Next Steps:</p> <ul style="list-style-type: none"> ● YR and Stantec will circulate meeting minutes, and an updated comment response table based on feedback received today. ● YR and Stantec are seeking to resolve and close out comments provided on the draft EA and technical reports. ● YR and Stantec will continue to have similar meetings with other review agencies over the months of June and July. ● Minutes of this meeting, comment response table to be included as part of EA documentation. ● YR and Stantec are targeting an end of summer submission of EA to MECP. TRCA will be notified at this time. ● SB: will TRCA be recirculated the EA report? <ul style="list-style-type: none"> ○ AH: we do not anticipate recirculating for comments prior to MECP circulation. There is an opportunity to provide comments to MECP. ○ SB noted TRCA would let York Region know in advance if any further comments, prior to sending to MECP. ● PJ added that we anticipate about 6 months for MECP to review. MECP may identify conditions of approval of the EA, which YR will have to comply with and report on until construction complete. YR is allowing for a long Detail Design, permitting and approvals process prior to implementation. ● AH noted that the City of Vaughan has made a request through their City Council to acquire the roadway. A report will go back to Council in September. <ul style="list-style-type: none"> ○ SB asked whether Vaughan has signed off on the width of the trail underneath the bridge and if it is 3 m wide? ○ AH: Vaughan has not provided a formal “sign off”; however, we met last week, and active transportation is very important to the 	

Item:	Action:
<p>City (including North Maple Park and active transportation connections). YR has proposed a two-phase approach: the first with a lesser footprint through the landfill area until future constraints lifted. This is subject to future discussions in Detail Design.</p> <ul style="list-style-type: none">○ SB: requested that the TRCA wishes to avoid widening of the benched pathway under the bridge towards watercourse if it determined the width needs to be increased.○ AH confirmed that this will be discussed further in Detail Design and that this commitment is captured in the meeting minutes.● TRCA staff requested that YR provide a memo identifying how TRCA crossing guidelines have been met with the proposed designs. TRCA will need the memo to ensure compliance with TRCA's stream crossing guidelines. TRCA Crossings Guideline 2015-v2.pdf	

Meeting adjourned at 12 PM.

The foregoing is considered to be a true and accurate record of all items discussed. If any discrepancies or inconsistencies are noted, please contact the writer immediately.

Sincerely,

Stantec Consulting Ltd.

Meghan MacMillan RPP, MCIP
Associate, Senior Environmental Planner
Phone: (613) 703-6916
Mobile: (343) 996-9967
meghan.macmillan@stantec.com

Attachment: Teston Road Bridge and Valley & 40m vs. 80m Bridge Comparison Drawings
Updated YR Table of Responses to TRCA's Comments on Draft EA Report

APPENDIX B: TRCA COMMENTS AND PROPONENT RESPONSES
on Draft York Region IEA / CEA Report (August 2024 and December 2024)
Teston Road Area Improvements (Keele Street to Bathurst Street) IEA / CEA

ITEM	DISCIPLINE	TRCA COMMENTS (December 20, 2024)	PROponent RESPONSES - DRAFT
1.	General	Note that section 5.2.5.3, and any other sections that reference TRCA's previous regulation (O. Reg. 166/06), should be updated to reference O. Reg. 42/24.	Comment noted. We have updated the regulation throughout the IEA report.
2.	Planning	Staff recommends exploring options for the proposed bridge to be appropriately sized to better address TRCA comments, and to avoid or minimise any impacts from the proposed grading and fill in the valley and hardening of watercourse banks.	York Region agrees (at Detail Design) to review / optimize the Don River West Branch bridge design, and, while maintaining a single span and through engagement with TRCA, to consider bridge options with a somewhat greater span (between 40 m and 80 m) to: increase the bridge opening, allow for a greater meander belt and ensure that potentially increased active transportation space requirements do not reduce the flood plain area between the bridge foreslopes.
3.	Planning Ecology	As discussed previously, for the proposed crossing, staff would like to note that the proposed 40 m bridge span does not seem appropriate for this valley due to the substantial width at 556m and a wetland throughout the valley and within the road alignment. Provide a memo outlining how the proposed bridge span meets TRCA's Stream Crossing Guideline would be helpful. The memo to also provide a comparison between the preferred 40 m span, a larger span (with piers, as appropriate) mentioned in Comment #2 and the evaluated option of 80 m span with piers.	<p>York Region acknowledges TRCA's concerns regarding the environmentally important and sensitive lands within the Don River Tributary valley and potential effects associated with the recommended project design. The Region has undertaken extensive field studies and analysis to characterize the conditions within the study area and has committed through the IEA to detailed additional studies and to mitigating the potential negative effects of the project.</p> <p>Although the proposed 45 m span bridge design (with a 40 m clear opening between abutments) does not meet all objectives within the TRCA's Crossings Guideline for Valley and Stream Corridors the design as developed (including the retaining and wing wall elements) provides a comparable footprint to the previously considered 80 m span bridge option (although less of an opening for flora and fauna movement). The 40 m bridge option has approx. 0.1 ha. more embankment area vs. the 80 m option, although this 0.1 ha. of area would have fallen within the 'shadow' of the bridge under both bridge options and would have required a comparable amount of tree removal and loss of habitat.</p> <p>The IEA report has considered the potential effects of the project and recommends mitigation measures to address potential project effects including restoration / compensation strategies. Recommendations include:</p> <ul style="list-style-type: none"> • Ecosystem compensation recommendations have been quantified for permanent loss areas, in accordance with the TRCA's Guideline for Determining Ecosystem Compensation (2023). Recommended replacement ratios for the project vary from 1:1 to 5:1 depending on the ELC community. The IEA study recommends over 12 hectares of ecosystem compensation. Potential compensation locations have been identified in the vicinity of the project. • A Wetland and Significant Wildlife Habitat (SWH) Restoration Plan will be developed to accurately characterize these areas, identify opportunities to minimize impacts, and to develop appropriate mitigation and restoration measures for any impacts in consultation with the MNR. Key considerations at detailed design will be ensuring maintenance of wetland connectivity and appropriate restoration or compensation of wetlands. Enhancement measures implemented as part of the restoration plan should consider and complement confirmed SWH within the project limits, and may include turtle nesting areas, turtle basking areas, reptile hibernacula, bat houses, duck nesting structures, and more. • A Wildlife Crossing Plan will be developed as part of detailed design considering wildlife crossing for deer, small mammals, turtles, and amphibians. This will include wildlife fencing alongside the road within and adjacent to habitat for these species to tie in with wildlife crossings and encourage use by wildlife. Wildlife passages should be implemented in suitable locations, should be of sufficient size, and should be designed with features that facilitate wildlife movement across the roadway.

			<ul style="list-style-type: none"> • A Vegetation Restoration Plan will be developed to reinstate lost vegetation within negative impact and harmful alteration areas within the project footprint. Development of a Vegetation Restoration Plan will include recommendations within TRCA's Seed Mix Guideline (2022) and be completed in consultation with the TRCA. Key measures will include planting of native species providing similar or superior benefit to potentially impacted wildlife. Where possible, restoration techniques on site should be in accordance with TRCA's Post-Construction Restoration Guidelines (2004). • Restoration and planting plans within and adjacent to wetlands and along the tributary will focus on improving riparian conditions and functions to improve habitat quality and water quality at the bridge as well as downstream. The section of the Don River tributary which falls within the project area is a clear, cold, headwater stream and would benefit from additional woody material and leaf litter contributions and riparian shading. • An Invasive Species Management Plan will be developed to document up-to-date conditions and removal and management plans. Invasive species such as Common Reed (restricted), Japanese Knotweed (restricted), and Goutweed have been recorded within and adjacent to the project limits. • Regulatory requirements will be satisfied where habitat is present for certain Threatened species (Bobolink, Eastern Meadowlark) requiring habitat protection under the ESA (Option 1 Pay a Species Conservation Charge, or, Option 2 Create or Enhance Grassland Habitat). • Acoustic surveys will confirm whether SAR bats are present in potential maternity roost trees in the area and will assist in determining whether authorization under the ESA will be required. • It is anticipated that an authorization from TRCA under O. Reg. 41/24: Prohibited Activities, Exemptions and Permits will be required. Mitigation measures with regard to the regulated area will be discussed with TRCA at the time of the application. • Migratory Bird Conventions Act (MBCA) Schedule 1 species requiring nest searches within the Technically Preferred Alternative limits include: Pileated Woodpecker, Great Blue Heron, and Green Heron. Schedule 1 nests will be protected year-round unless they have been shown to be abandoned. • Targeted surveys to determine the presence or absence of SAR Blanding's Turtles within and adjacent to the project limits are required to determine whether actions/authorization under the ESA are required for this species. • While there are currently no Butternuts or Black Ashes within 50 m of the proposed work limits, additional surveys for these SAR trees are recommended within and adjacent to the project limits, closer to commencement of the project, to determine whether these species are present and whether actions/authorizations under the ESA are required. <p>York Region will provide a memo to TRCA to document the extent to which TRCA's crossing guidelines (TRCA_Crossings_Guideline_2015-v2.pdf) have been met with the proposed designs.</p>
4.	Planning Ecology	It also appears that the proposed 40 m span would require a channel realignment and further in-water works, which might be avoided through a much larger bridge span (refer Comment #3) and does not appear to meet TRCA's Stream Crossing Guidelines.	<p>Yes, the 45 m bridge would require some in-water works (approx. 90 square metres below the 2-year high water mark), which could potentially be avoided through a longer bridge configuration (subject to span arrangement and pier placements).</p> <p>Please note that there is no existing channel immediately upstream of the bridge crossing as the Don River West Branch passes through an area of water impoundment due to the presence of a constructed pond. Channel realignment in this area is an optional improvement that likely would have been recommended under both the 40 m and 80 m bridge options.</p>

			The EA report identifies an opportunity to take the existing constructed pond [Duckweed Floating-leaved Shallow Aquatic (SAF1-3) community] off-line by rerouting the existing watercourse around the pond, improving habitat quality within the watercourse for fish, while still ensuring maintenance of wetland habitat within the pond for amphibians and other wildlife. This change also provides the opportunity to better allow for wildlife passage (as requested by TRCA). This pond is located on private property therefore this recommendation will need to be addressed in conjunction with the adjacent property owner and developer. DFO will be consulted (i.e., through submission of a Request for Review) on any changes made to existing fish habitat, as a Fisheries Act Authorization may be required to complete this work.
5.	Planning Ecology	Staff notes that the permanent habitat losses associated with the limit of the fill in the valley and the road embankment slopes is unclear. Provide a memo outlining the types and amounts of habitat losses, especially in the wetland, associated with the proposed works. While the L ranks of the community losses have been provided; however, also provide the types of habitats. This also to be completed as part of the memo referred in Comment #3.	Table 10-2 of the EA Report and Section 5.2.2 and Table 10 of the Natural Environment Report (Appendix E) outline the impacts to habitat based on ELC community (i.e. type of habitat).
6.	Water Resources	Note that Table 5: Summary of Peak Flows at Crossings (Existing) in the Drainage and Stormwater Management Report has incorrect flows for crossing ED01. Further, the HecRAS cross-sections have different numbering than TRCA's current hydraulic model, so it appears that the most recent version of the modelling has not been used. This is particularly important as the current Regional flow in the location of ED01 is 41.74 cms which is larger than the 36.87 cms. Contact TRCA for the most recent version of the modelling and add the proposed crossing to demonstrate there are no negative impacts to flooding.	EAs occur over many years, HEC-RAS modelling was completed based on the model version received on October 29, 2021. Modelling will be updated during detailed design. Regarding ED01 (XS 3324.56), the downstream flow at 3270.27 is not applicable to the ED01 crossing as it is downstream. 36.87 cms is considered to be the appropriate flow to be used for analysis.
7.	Water Resources	Provide a digital version of the HecRAS modelling (once the current modelling has been updated) for review.	Please see above response. Modelling will be updated at detail design (as required) and can be provided to TRCA at that time. If you wish to receive the current version of the model as is, please let us know.
8.	Water Resources	Table 14: Stormwater Management Detention and Retention Requirements in the Drainage and Stormwater Management Report provides some details surrounding the required storage volumes needed, however, further details are required to demonstrate what the proposed release rates are, how they compare to the UFR and post-to-pre targets and demonstrate that required volumes can be feasibly provided in the space available.	The target release rate will be the ceiling for the proposed release rates. The outflow for each outlet was not determined through the preliminary design. Storage can be compared against Table 16 for SWM strategy on an outlet basis.
9.	Water Resources	Include the hydrology modelling for the 2 yr storm to demonstrate the target release rates are being achieved.	York Region's 2 year IDF has not been provided and with the lowest return period being 5 years, so the 2 year storm modelling was not completed. This can be completed at detail design as required.
10.	Water Resources	The fluvial geomorphological study notes that the meander belt width is 43.1 m and the proposed bridge span was 80 m. As the proposed span for ED01 is now 40 m, provide an opinion on the proposed span by the Fluvial Geomorphologist. Further, consideration should be given to the trails and wildlife crossings at this location and if a larger bridge would be more appropriate to allow for all proposed uses of this structure.	The Draft IEA Fluvial Erosion Hazard Study Report (June 2023) notes the following: <ul style="list-style-type: none"> • Don River Tributary bankfill width at the proposed bridge crossing location is approximately 1.2m • Initial estimated empirical equation meander belt widths ranged from 5.3m to 25.8m • The TRCA empirical belt width requires that a factor of safety be added to the preliminary belt width. Given that a change in hydrologic conditions is anticipated, a factor of safety is calculated by adding two times the site-specific standard error (8.63m) to the preliminary meander belt width. This factor of safety resulted in a final belt width of 43.1m which represents the preferred minimum valley bottom width related to erosion hazard limits. (Additional setbacks and constraints beyond the meander belt width (e.g., stable side slopes, erosion access allowance, flood hazard) were not included in this assessment.) The proposed bridge configuration preferred by York Region consists of a single span bridge with a 40m clear opening between (false) abutment walls and approximately 25m between the river stone protected fore slopes in front of the abutments. While the design approximately accommodates the initially estimated meander belt width of 25.8m it does not fully accommodate the final belt width of 43.1m including safety factor allowance. The proposed river

			stone slope protection is intended to mitigate against long-term erosion risk to the structure caused by lateral stream erosion. Additional analysis will be required as part of detail design and through consideration of a potentially larger bridge span.
11.	Geotechnical Engineering	As per the grading plan (Appendix B- Preferred Design Plan), staff understands that portions of the slopes/areas north and south of Teston Road will be regraded. The proposed grades (and regraded slope inclinations) are not shown on any of the plans. Ensure in the final plans that the regraded slope inclinations are clearly depicted. Further, include cross-sections that illustrate the proposed grades with respect to the existing grades. Submit the final grading plans.	Figure 1-10 of the EA Report shows typical 3:1 cut and fill grading side slopes under the interim design cross-section. Figure 8-23 of the EA Report shows 2:1 slides slopes on the approach embankments of the Don River Tributary bridge crossing along with 2 sets of 2.0 m benches with 10% cross-slope. Cut and fill grading lines are shown on the preliminary design drawings in Appendix B. The EA report also includes a recommendation that retaining walls be utilized in constrained areas to limit encroachment onto adjacent lands. Final grading plans and cross-sections will be shared with TRCA at the detail design stage of the project.
12.	Geotechnical Engineering	As per the preliminary foundation report (Appendix R2), it is understood that global stability analyses were carried out for conceptual RSS walls. As stated in the report, the global stability will be re-evaluated once the design is finalized. Submit the final foundation report and ensure the global stability reassessment is included in the final report.	A final foundation report (including global stability assessment) will be shared with TRCA at the detail design stage of the project.
13.	Geotechnical Engineering	Submit the final engineering drawings of the proposed trails, multi-use pathways, proposed bridge, MSE walls, culverts, (and any other proposed structures). Note that the engineering drawings should be signed and sealed by a licensed Professional Engineer.	Final engineering drawings of the proposed trails, multi-use pathways, proposed bridge, MSE walls, culverts, (and any other proposed structures) will be shared with TRCA at the detail design stage of the project. Final engineering drawings will be signed and sealed by a licensed Professional Engineer.
14.	Hydrogeology	Figure 7: Approximate Locations of Landfill Monitoring Systems and Chloride Plume Extent shows three aquifers (i.e., Upper Aquifer, Intermediate Aquifer, and Lower Aquifer) from which groundwater samples were collected. However, Section 3.4 Hydrogeology in the Hydrogeology Study did not provide any description of these three aquifer systems and their regional and site-specific spatial and vertical extents. The aquifer systems at the project area need to be presented in more detail with regional and site-specific extents and stratigraphic cross-sections, site-specific lithology and stratigraphic heterogeneity and borehole logs, aquifer types, connections within the aquifers, presence of regional and site-specific aquitards, local and regional production aquifers, water level distributions, seasonal variations of water levels, interactions with nearby surface water features, and extent of chloride plumes in the aquifer systems. A discussion is also required to highlight the portions of the aquifer systems, which are vulnerable and can be easily impacted due to the proposed infrastructure development and associated activities.	Updates have been made to the Hydrogeology Report including addition of the local aquifer names, thicknesses, details regarding groundwater flow patterns and additional discussion regarding the potential project impacts and mitigation measures.
15.	Hydrogeology	Based on the sensitivity of the project, the hydrogeological report should have provided detailed dewatering information regarding the area where dewatering is required, dewatering methods, the invert depth, the required drawdown for dry working condition, dewatering rate/volume, dewatering time frame, the aquifer to be dewatered, zone of influence due to dewatering, dewatering discharge options, dewatering impact on the water resources including the PSW, unevaluated wetlands, Don River Tributary and landfill monitoring programs and other water users, possible impact on chloride plumes (and VOCs plumes) distributed within the groundwater in the project area. The hydrogeological report needs to provide a discussion regarding the additional hydrogeological assessment, if required, and monitoring requirement/contingency plan that will ensure that the sensitive receptors will not be impacted due to dewatering activities. Groundwater monitoring is also required to ensure that the dewatering does not affect the existing landfill	Additional discussion regarding dewatering has been included in the Hydrogeology Report along with additional details on potential impacts to sensitive receptors and corresponding mitigation measures. Most of the proposed construction work is above the water table, and dewatering will be limited to certain areas near the water crossings. Additional analysis has been added to the Hydrogeology Report that provides preliminary assessment of the significance of the potential dewatering, which is used to support the conclusions of the report. Additional analysis will be undertaken at detail design as required through the permitting and approval process.

		<p>monitoring, purging and management activities and ensure that the existing chloride plumes in these three landfills will not impact clean aquifers due to migration of impacted plumes during dewatering.</p> <p>Also clarify how the protections of the permit to take water (PTTW) or environmental activity site registry (EASR) system are sufficient to mitigate potential impacts on the sensitive receptors described above. As the dewatering volume and associated dewatering impacts are unknown and based on site sensitivity, MECP may require a Category 3 PTTW permit, which requires detailed hydrogeologic investigations and impact assessments.</p>	
16.	Hydrogeology	<p>It is noted that “the entire study area falls within the WHPA-Q1 (for the York-Durham Municipal wells, Map 3.4 in the SPP). Other than minor and temporary water taking that may be required for construction dewatering, the proposed work is not an activity that may take water without returning it to the same source. As such, none of the SPP policies that would be triggered by WHPA-Q1 (specifically, DEM-1, DEM-2, DEM-3, DEM-4, DEM-9, and DEM-10, see the Section 10 of the SPP) result in any EA commitments”.</p> <p>Staff notes that dewatering requirements, dewatering rates and associated impacts due to dewatering on sensitive receptors are not evaluated or known; therefore, the proposed dewatering cannot be regarded as minor dewatering. Similarly, it is not known whether the actual dewatered volume of groundwater will be returned to the same source aquifer.</p> <p>Due to the poor groundwater quality as described in Section 3.6.3 Water Inspection and Sampling, it is unknown whether the extracted groundwater during dewatering, if any, can be returned to the same source. A discussion of possible dewatering discharge plan is required.</p>	<p>Additional discussion regarding dewatering has been included in the Hydrogeology Report along with additional details on potential impacts to sensitive receptors and corresponding mitigation measures. Most of the proposed construction work is above the water table, and dewatering will be limited to certain areas near the water crossings. Additional analysis has been added to the Hydrogeology Report that provides preliminary assessment of the significance of the potential dewatering, which is used to support the conclusions of the report. Additional analysis will be undertaken at detail design as required through the permitting and approval process.</p>
17.	Hydrogeology	<p>The shallow groundwater levels at or above ground surface as per Section 3.4.2 Groundwater and Section 3.6.1 Groundwater Monitoring are not consistent with the distribution of water level data provided in Section 3.4.2. Figure 7 that shows potentiometric contours ranging in elevation from 260 masl on the north to 235 masl on the south/southeast with a difference in water level of 25 m.</p> <p>The water table across the entire project area is shown in Cross Section AA' on Figure 6 in Appendix A. However, it is not known when and from which aquifers these water level data were collected. No information is provided regarding the aquifer, which represents these potentiometric contours in Figure 7. No borehole logs were provided to understand the screen intervals and location of screens (i.e., A22-2 and C1) within the aquifer systems. Revise the appropriate reports to include the details.</p>	<p>Updates have been made to the Hydrogeology Report including addition of the local aquifer names, thicknesses, details regarding groundwater flow patterns and additional discussion regarding the potential project impacts and mitigation measures. While significantly more details have been added to the Hydrogeology Report, it is important to note that the level of detail in the report is commensurate with the information that was available at the time of the assessment. Much of the understanding of the hydrogeology of the Keele Valley Landfill area was determined from high level documents such as presentations to council or presentations made to the project team from consultants to the City of Toronto.</p>
18.	Hydrogeology	<p>Section 3.4.3.1 Wellhead Protection Area notes the entire study area falls within the WHPA-Q2 (also for the York-Durham Municipal wells, Map 3.4 in the SPP). It notes that the only SPP policy triggered by WHPA-Q2 is REC-1, which is to be implemented by the Planning Approval Authority. As noted in the report, the most applicable part of the policy that applies will be for applications under the Planning Act within the Tier 3 Water Budget WHPA-Q2.</p> <p>Section 5.5 notes that the project will not result in an application under the Planning Act, and, as such, the above policy is not applicable. It is noted, however, that the project will incorporate “best management practices such as low impact development (LID)”. Caution is required to ensure that any</p>	<p>The confirmation of whether or not LID measures will be implemented as part of the project will be done at the detail design stage of the project and, if LID measures are carried forward, then additional supporting analyses will be required. At this stage, a simple water balance has been provided in the revised Hydrogeology Report that approximately quantifies the change in groundwater recharge due to hard surfacing of the roadway and compares it to an estimate of the overall flow through the aquifer system.</p>

		<p>infiltration of potentially salt-impacted road runoff does not interfere with the monitoring of the landfills in the area”.</p> <p>However, the best management practice in LID requires pre and post development water balance study. Based on the project area sensitivities, a more detailed hydrogeologic impact assessment compared to those limited scope water balance required for LID is required, where evaluation of groundwater recharge and changes in groundwater levels, interaction between groundwater and surface water, changes in discharge/seepage to sensitive water features, if any, may be an important part of the hydrogeologic impact assessment.</p>	
19.	Hydrogeology	As noted in Section 4.2.3 Natural Environment in the approved Terms of Reference, dated June 2018, amended October 2018, provide details of wetland and the possible impacts of the proposed works.	This information is provided within the EA report's Natural Science sections and in Appendix E.

September 18, 2025

VIA EMAIL ONLY TO: harsimrat.pruthi@trca.ca

Toronto and Region Conservation Authority
Infrastructure Planning and Permits
Development and Engineering Services
101 Exchange Avenue
Vaughan, ON L4K 5R6

Attention: Harsimrat Kaur Pruthi, M.A., M.Pl., Senior Planner

**RE: York Region Teston Road Area Comprehensive Environmental Assessment (EA)
Compliance with TRCA's Crossing Guideline for Valley and Stream Corridors**

Our File:

Dear Harsimrat,

York Region appreciates the comments received from the Toronto and Region Conservation Authority (TRCA) and TRCA's participation to date in the Teston Road Area Improvements Comprehensive Environmental Assessment (EA).

The letter is a response to your request of July 25, 2025, to demonstrate how the proposed Don River West Branch Teston Road bridge design (and span) meets the TRCA's Crossing Guideline for Valley and Stream Corridors (September 2015 – v2).

We have provided a detailed response in table format (Attachment #1) based on a similar request and comments received from TRCA on October 3, 2023, which was prior to completion / public filing of the Draft EA Report which took place in fall of 2024. We believe that the studies undertaken as part of the EA generally meet or exceed the requirements of the TRCA's Crossing Guideline.

Please note that in response to concerns raised by TRCA, York Region now proposes to increase the span of the Teston Road bridge over the Don River West Branch from approximately 45 m to 50 m (with the clear span to increase from 40 m to 45 m) and to modify the provisions for active transportation trail facilities below the bridge and the bridge footing scour protection to increase the unconstrained ground level opening and available meander belt width from 25 m to approximately 43.1 m.

Although the now proposed 50 m span bridge design does not meet all ideal objectives within the TRCA's Crossings Guideline for Valley and Stream Corridors, the revised design improves upon several aspects of the previously proposed 45 m bridge span including total footprint, hydraulic opening, meander belt width and available width for wildlife passage. Please note that a 50 m span bridge is at or near the maximum single span length achievable with the currently proposed (NU) girders. A significantly longer bridge will adversely affect the project's overall affordability.

York Region acknowledges TRCA's concerns regarding the environmentally important and sensitive lands within the Don River Tributary valley and potential effects associated with the recommended project design. The Region has undertaken extensive field studies and analysis to characterize the conditions within the study area and has committed through the EA to additional detailed studies and to mitigating the potential negative effects of the project.

We trust that the attached adequately responds to your request for the purposes of the EA and we look forward to continuing to engage with TRCA as this project continues through the EA, detailed design and implementation stages. We will also continue to share details of the design and any required mitigations as this work proceeds.

We would be pleased to meet with TRCA 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,

A handwritten signature in black ink, appearing to be 'Billy Cheung', with a stylized flourish at the end.

Billy Cheung, M.A.Sc., P.Eng., Project Manager
Capital Delivery - Transportation, Capital Infrastructure Services, Public Works
The Regional Municipality of York | 17250 Yonge Street | Newmarket, ON L3Y 6Z1
O: 1-877-464-9675 ext. 76046 | C: 905-716-5632 | Billy.Cheung@york.ca

CC Emails to:

Praveen John, Manager(A) - Engineering, York Region; Praveen.John@york.ca
Andrew Harkness, Consultant Project Manager, Stantec, Andrew.Harkness@stantec.com
Meghan MacMillan, Consultant Senior Environmental Planner, Stantec, Meghan.MacMillan@stantec.com

Attachment(s) (1)

ATTACHMENT #1

York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) Comprehensive EA

TRCA COMMENTS (OCTOBER 2023) AND UPDATED PROPONENT RESPONSES (SEPTEMBER 2025)

TRCA COMMENTS (October 3, 2023)	PROponent/CONSULTANT RESPONSE (August 2025)
<p>1. Demonstrate how the proposed bridge span meets TRCA’s Stream Crossing Guideline including the following but not limited to:</p>	<p>The following responses are updated responses based on the Draft Responses to TRCA’s previous comments of October 3, 2023 that reference the TRCA’s Crossing Guideline for Valley and Stream Corridors (September 2015) - TRCA Crossings Guideline 2015-v2.pdf.</p>
<p>a) Given the width of the valley, 40 m span may not be appropriate. Note the following.</p> <ul style="list-style-type: none"> I. The valley is a Regionally Significant Earth Science ANSI, the Maple Spur Channel; II. It is also a Regionally Significant Life Science ANSI, The Maple Uplands and Kettles; III. There is a PSW within the road alignment, the East Don River Headwater Wetland Complex; IV. The width of the valley along the alignment is approximately 556 m. Flora and fauna currently have 556 m of valley width to travel through, which is proposed to be reduced by 93%. 	<p>In response to TRCA’s concerns York Region now proposes to increase the proposed span of the Teston Road bridge over the Don River West Branch from approximately 45 m to 50 m (with the clear span to increase from 40 m to 45 m) and to modify the provisions for active transportation trail facilities below the bridge and the footing scour protection to increase the unconstrained ground level opening and available meander belt width from 25 m to approximately 43.1 m.</p> <p>Although the revised proposed 50 m span bridge design may not fully meet all ideal objectives within the TRCA’s Crossings Guideline for Valley and Stream Corridors the currently proposed design improves upon several aspects of the previously proposed 45 m bridge span including total footprint, hydraulic opening, meander belt width and available width for wildlife passage. A 50 m span bridge is at or near the maximum single span length achievable with the currently proposed (NU) girders. A significantly longer bridge will adversely affect the project’s overall affordability.</p> <p>York Region acknowledges TRCA’s concerns regarding the environmentally important and sensitive lands within the Don River Tributary valley and potential effects associated with the recommended project design. The Region has undertaken extensive field studies and analysis to characterize the conditions within the study area and has committed through the EA to additional detailed studies and to mitigating the potential negative effects of the project.</p> <p>The EA report has considered the potential effects of the project and recommends mitigation measures to address potential project effects including restoration / compensation strategies. Recommendations include:</p> <ul style="list-style-type: none"> • Ecosystem compensation recommendations have been quantified for permanent loss areas, in accordance with the TRCA’s Guideline for Determining Ecosystem Compensation (2023). Recommended replacement ratios for the project vary from 1:1 to 5:1 depending on the ELC community. The EA study recommends over 12 hectares of ecosystem compensation. Potential compensation locations have been identified in the vicinity of the project. • A Wetland and Significant Wildlife Habitat (SWH) Restoration Plan will be developed to accurately characterize these areas, identify opportunities to minimize impacts, and to develop appropriate mitigation and restoration measures for any impacts in consultation with the MNRF. Key considerations at detailed design will be ensuring maintenance of wetland connectivity and appropriate restoration or compensation of wetlands. Enhancement measures implemented as part of the restoration plan should consider and complement confirmed SWH within the project limits, and may include turtle nesting areas, turtle basking areas, reptile hibernacula, bat houses, duck nesting structures, and more. • A Wildlife Crossing Plan will be developed as part of detailed design considering wildlife crossing for deer, small mammals, turtles, and amphibians. This will include wildlife fencing alongside the road within and adjacent to habitat for these species to tie in with proposed wildlife crossing locations and to encourage use by wildlife. Wildlife passages should be implemented in suitable locations, should be of sufficient size, and should be designed with features that facilitate wildlife movement across the roadway. The currently proposed bridge design also allows for over 40 m of width for wildlife passage along the channel. A potential wildlife crossing culvert is also proposed beneath Teston Road along the west side of the Don River West Branch. • A Vegetation Restoration Plan will be developed to reinstate lost vegetation within negative impact and harmful alteration areas within the project footprint. Development of a Vegetation Restoration Plan will include recommendations within TRCA’s Seed Mix Guideline (2022) and be completed in consultation with the TRCA. Key measures will include planting of native species providing similar or superior benefit to potentially impacted wildlife. Where possible, restoration techniques on site should be in accordance with TRCA’s Post-Construction Restoration Guidelines (2004). • Restoration and planting plans within and adjacent to wetlands and along the tributary will focus on improving riparian conditions and functions to improve habitat quality and water quality at the bridge as well as downstream. The section of the Don River tributary which falls within the project area is a clear, cold, headwater stream and would benefit from additional woody material and leaf litter contributions and riparian shading.

	<ul style="list-style-type: none"> • An Invasive Species Management Plan will be developed to document up-to-date conditions and removal and management plans. Invasive species such as Common Reed (restricted), Japanese Knotweed (restricted), and Goutweed have been recorded within and adjacent to the project limits. • Regulatory requirements will be satisfied where habitat is present for certain Threatened species (Bobolink, Eastern Meadowlark) requiring habitat protection under the ESA (Option 1 Pay a Species Conservation Charge, or, Option 2 Create or Enhance Grassland Habitat). • Acoustic surveys will confirm whether SAR bats are present in potential maternity roost trees in the area and will assist in determining whether authorization under the ESA will be required. • It is anticipated that an authorization from TRCA under O. Reg. 41/24: Prohibited Activities, Exemptions and Permits will be required. Mitigation measures with regard to the regulated area will be discussed with TRCA at the time of the application. • Migratory Bird Conventions Act (MBCA) Schedule 1 species requiring nest searches within the Technically Preferred Alternative limits include: Pileated Woodpecker, Great Blue Heron, and Green Heron. Schedule 1 nests will be protected year-round unless they have been shown to be abandoned. • Targeted surveys to determine the presence or absence of SAR Blanding’s Turtles within and adjacent to the project limits are required to determine whether actions/authorization under the ESA are required for this species. • While there are currently no Butternuts or Black Ashes within 50 m of the proposed work limits, additional surveys for these SAR trees are recommended within and adjacent to the project limits, closer to commencement of the project, to determine whether these species are present and whether actions/authorizations under the ESA are required. • <i>See response below in next section</i> regarding the opportunity to take the existing pond [Duckweed Floating-leaved Shallow Aquatic (SAF1-3) community] offline by rerouting the existing watercourse around the pond, thereby improving habitat quality within the watercourse for fish, while still ensuring maintenance of wetland habitat for amphibians and other wildlife.
<p>b) Confirm if the 40 m span would require a channel realignment and other in-water works, which could be avoided through a much larger bridge span, and to meet TRCA’s Stream Crossing Guidelines.</p>	<p>Please note that there is no existing channel immediately upstream of the bridge crossing as the Don River West Branch passes through an area of water impoundment due to the presence of a constructed pond. Channel realignment in this area is an optional improvement that likely would have been proposed under both the (previously recommended) 45 m and 80 m bridge options as well as the currently proposed 50 m span bridge.</p> <p>The previously proposed 45 m bridge would have required some in-water works (approximately 90 square metres below the 2-year high water mark), which could potentially be avoided through a longer bridge configuration (subject to span arrangement and pier placements). We anticipate that the revised 50 m span bridge (with modified trail and foreslope design) will reduce (and potentially avoid) any directly associated in-water works – although this will be confirmed at detail design.</p> <p>The EA report identifies an opportunity to take the existing pond [Duckweed Floating-leaved Shallow Aquatic (SAF1-3) community] off-line by rerouting the existing watercourse around the pond, improving habitat quality within the watercourse for fish, while still ensuring maintenance of wetland habitat within the pond for amphibians and other wildlife. This change also provides the opportunity to better allow for wildlife passage (as requested by TRCA). This pond is located on private property therefore this recommendation will need to be addressed in conjunction with the adjacent property owner and developer. DFO will be consulted (i.e., through submission of a Request for Review) on any changes made to existing fish habitat, as a Fisheries Act Authorization may be required to complete this work.</p>
<p>c) It appears that the proposed 40 m span bridge will not span the Regional flood plain as the flood plain is about 60 m wide just west of Dufferin Street at Teston Road. Should the proposed 40 span move through the EA review, TRCA will require hydraulic modeling to be completed to demonstrate there are no negative impacts to flooding as a result of this work. Also, the modeling must demonstrate that the road is not overtopped during the regional storm event to provide safe access along the new road.</p>	<p>Our previous assessment determined that there would be only a minor (approx. 0.2 m) water level increase under peak flows with a 45 m vs. an 80 m span - which is not a significant impact in the context of the valley.</p> <p>The revised 50 m span will increase the toe of slope opening beneath the bridge from approximately 25 m to 43.1 m.</p> <p>The bridge will be located over 7m above the top of the bank, so overtopping of the roadway would not be a concern.</p>
<p>d) demonstrate that the proposed crossing is appropriate from a fluvial geomorphic perspective.</p>	<p>The EA’s Fluvial Erosion Hazard Study Report (June 2023) notes the following:</p> <ul style="list-style-type: none"> • Don River Tributary bankfill width at the proposed bridge crossing location is approximately 1.2 m • Initial estimated empirical equation meander belt widths ranged from 5.3 m to 25.8 m

	<ul style="list-style-type: none"> The TRCA empirical belt width requires that a factor of safety be added to the preliminary belt width. Given that a change in hydrologic conditions is anticipated, a factor of safety is calculated by adding two times the site-specific standard error (8.63 m) to the preliminary meander belt width. This factor of safety resulted in a final belt width of 43.1 m which represents the preferred minimum valley bottom width related to erosion hazard limits. (Additional setbacks and constraints beyond the meander belt width (e.g., stable side slopes, erosion access allowance, flood hazard) were not included in this assessment.) <p>The previously proposed 45 m bridge span provided a 40 m clear opening between (false) abutment walls and approximately 25 m between the river stone protected fore slopes in front of the abutments.</p> <p>The revised 50 m span will increase the toe of slope opening beneath the bridge from approximately 25 m to 43.1 m, and thus will now accommodate not only the initially estimated meander belt width of 25.8 m but also the final belt width of 43.1m including safety factor allowance related to erosion hazard limits. The proposed bridge footing river stone slope protection is intended to mitigate against long-term erosion risk to the structure caused by lateral stream erosion. Additional analysis will be required as part of detail design.</p>
<p>e) Provide a comparison between the proposed 40 m span and the option of the 80 m span.</p>	<p>A comparison of the previously considered 45 m and 80 m span bridge options was shared with TRCA at our meeting of June 23, 2025.</p> <p>The footprint of the structure and embankments within the valley for the 45 m span bridge option is approx. 31,145 m² including wingwalls with 441 m² of open area under bridge. For the 80 m span option, the total footprint (29,685 m²) is reduced by 1,460 m² or approx. 5% vs. the 45 m span option. There is an expanded opening under the bridge (increasing to 736 m²). The difference in footprint between the two bridge options would generally have fallen within the 'shadow' of the bridge under both bridge options and would have required a comparable amount of tree removal and loss of habitat.</p>
<p>2. It is unclear whether Figure 1 includes permanent habitat losses associated with the limit of the fill in the valley, the road embankment slopes.</p> <p>a) Provide a memo outlining the types and amounts of habitat losses associated with the entire road works would be helpful. While the L ranks of the community losses have been provided on the Figure, the types of habitats have not. This should also be completed for Figure 2, the 80 m span and a comparison between the two provided.</p>	<p>The Draft EA Natural Environment Report (which was made available to TRCA in late 2024) provides details regarding the types and amounts of habitat losses associated with the recommended project including: Areas of Impact within Designated Natural Areas (Permanent, Negative, Harmful Alteration), and, Areas of Impact per ELC Community (Permanent, Negative, Harmful Alteration).</p> <p>A Wildlife SAR and SAR Habitat Summary (Observed and Potential) and details of Wildlife Observed (Birds, Herptiles, Mammals, Invertebrates) are also included in the Report. The Region has undertaken extensive field studies and analysis to characterize the conditions within the study area and has committed through the EA to extensive additional studies and mitigation measures to address potential effects.</p> <p>The previously proposed 45 m span bridge design (including the retaining and wing wall elements) provides a comparable overall footprint to the previously considered 80 m span bridge option (although less of an opening for flora and fauna movement). In addition to having 40 m less width for movement of flora and fauna, the 45 m span bridge had 1,152 square metres (0.1 hectares) of greater permanent loss of habitat vs. the 80 m span bridge option but had correspondingly less harmful alteration area (where restoration capacity will be limited under the bridge). The main difference between the two options was the available bridge opening width for flora and fauna movement.</p> <p>While detailed footprint calculations have not yet been developed for the revised 50 m span we anticipate a footprint reduction of approximately 400 square metres associated with the revised bridge design versus the 45 m span bridge option.</p>
<p>3. a) A comprehensive geotechnical investigation is required.</p> <ol style="list-style-type: none"> I. Include all the necessary recommendations. II. Reports must be signed and sealed by a licensed Professional Engineer. III. A 2:1 benched and planted are being proposed for the bridge approaches. A qualified geotechnical engineer should be retained to provide the applicant with recommendations for the benched embankments. The recommendations should be included in the geotechnical report. Further, engineering drawings of the benched embankments should be submitted. 	<p>A Draft EA Pavement Design Report (WSP, March 2023) and a Draft EA Preliminary Foundation Report (WSP, February 2023) have been prepared by Professional Engineers (which were made available to TRCA in late 2024) and include all necessary recommendations for this stage of the project including for the proposed embankment design in the area of the Don River Tributary valley crossing. Additional investigations and reporting will be undertaken at the detailed design stage of the project.</p>
<p>b) It is understood that the proposed project will require significant site grading work. A detailed site grading plan should be submitted. Note that the site grading plan should include cross-sections of the regraded slope at adequate intervals.</p>	<p>Detailed site grading plans will be developed at the next (detailed design) stage of the project and will include cross-sections of the regraded slope at appropriate intervals.</p>

<p>c) Stamped engineering drawings of proposed road expansion, toe wall, retaining walls, bridges (and any other proposed structures) should be submitted.</p>	<p>Detailed stamped engineering drawings will be developed at the next (detailed design) stage of the project.</p>
<p>d) It is understood that a number of SWM ponds are being proposed. Engineering drawings (i.e. cross-sections) of the proposed SWM ponds should be submitted. Note that the side slope inclinations of the proposed SWM ponds should generally comply with MECP design guidelines. Alternatively, a geotechnical engineer can provide recommendations for the side slopes of the SWM ponds.</p>	<p>Preliminary details of the drainage and stormwater management recommendations are included in the Draft EA Report (which was made available to TRCA in late 2024). Detailed engineering drawings will be developed at the next (detailed design) stage of the project.</p>
<p>e) It is understood that the applicant is proposing potential trail crossings under the bridge deck and potential trail culvert crossings. Provide engineering drawings (i.e. cross-sections) of all of the trail crossings.</p>	<p>The EA Study includes proposed trail crossings under the Don River Tributary crossing bridge deck as well as an additional potential trail culvert crossing across the proposed embankment in this area. Detailed stamped engineering drawings will be developed at the next (detailed design) stage of the project.</p>

APPENDIX E-4 – Ministry of Natural Resources

Harkness, Andrew

From: Harkness, Andrew
Sent: Friday, September 12, 2025 3:14 PM
To: Catherine.Warren@ontario.ca; steve.varga@ontario.ca
Cc: Aldo.Ingraldi@ontario.ca; Cheung, Billy; John, Praveen; MacMillan, Meghan
Subject: RE: Teston Road Individual Environmental Assessment: Project Update Discussions with MNR
Attachments: YR-Teston-Road-EA-Comment-Response-Table_Sept-29-2023_MNR.docx

Good afternoon, Catherine and Steve,

With apologies for the delayed reply, we are providing a response to your emailed comments below of Sept. 29, 2023 – please see attached.

Of note, in response to MNR's and TRCA's concerns, York Region now proposes to increase the proposed span of the Teston Road bridge over the Don River East Branch from approximately 45 m to 50 m (with the clear span to increase from 40 m to 45 m) and to modify the provisions for active transportation trail facilities below the bridge and the footing scour protection to increase the unconstrained ground level opening and available meander belt width from 25 m to approximately 43.1 m.

Also as noted in the attached, York Region commits to continue to adhere to the requirements of Sections 41 (4) and (5) of the Provincial Oak Ridges Moraine (ORM) Conservation Plan during the detailed design phase of this project.

As you will be aware the Draft EA Report was filed for public and agency review late last year and the Region is targeting submission of the Final EA Report to MECP later this year.

If you have any questions about the attached or would like to meet to discuss, please let us know.

FYI – Billy Cheung is now York Region's PM and Meghan MacMillan from Stantec has replaced Nick Crockford as the Senior Environmental Planner on the consultant team. (Morrison Hershfield is now part of Stantec.)

Thank you and best regards,

Andrew

Andrew Harkness, P.Eng., IRP

Consultant Project Manager
Direct: 613 739-3258
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Andrew.Harkness@stantec.com
Stantec

From: Warren, Catherine (She/Her) (MNRF) <Catherine.Warren@ontario.ca>
Sent: Friday, September 29, 2023 3:08 PM
To: Nick Crockford <NCrockford@morrisonhershfield.com>
Cc: Varga, Steve (MNRF) <steve.varga@ontario.ca>; Ingraldi, Aldo (He/Him) (MNRF) <Aldo.Ingraldi@ontario.ca>
Subject: RE: Teston Road Individual Environmental Assessment: Project Update Discussions with MNRF

Hello Nick,

RE: Teston Road Extension and the 40 and 80 Metre Bridge Options

The Ministry continues to question putting a road through the heart of a major valley of the East Don River that is recognized by the province as a Natural Core Area in the Provincial Oak Ridges Moraine (ORM) Conservation Plan that supports significant forests, many over 100 years old, provincially significant groundwater-fed wetlands, a coldwater fisheries, and an earth and life science Area of Natural and Scientific Interest (ANSI), all key natural heritage features in the ORM plan. As well, the East Don River valley in this area is part of a regional/provincial scale natural heritage system corridor that is designated by the province in the ORM Conservation Plan and the Greenbelt Plan. It is one of only two valley corridors for the Don River watershed providing a wildlife corridor connection south along the Don valley to Lake Ontario and north to the Moraine's major east-west corridor, and from their further north to river corridors draining into Lake Simcoe.

Section 41 of the Oak Ridges Moraine Conservation Plan (ORMCP), particularly policies 3, 4 and 5, provide direction on limitations to development of infrastructure in Natural Core Areas, key natural heritage features and key hydrologic features which are present in this area. MNRF is concerned that these policies contained in the Oak Ridges Moraine Conservation Plan (ORMCP) had not been adequately considered as there are alternatives to this proposal which include using existing roads to the north and south or constructing a bridge which spans the entire valley.

In particular:

- Section 41 (4) of the ORMCP explicitly prohibits the opening of a road in an unopened road allowance, unless a series of explicit requirements outlined in section 41(5) are first met. The requirements of 41(5) focus exclusively on minimizing disruption and maintaining the ecological integrity of the natural heritage features and their ecological function.
- The ORMCP states the following in both Policy 41(2)(b)(5) and 41(5)(b):
“The planning, design and construction practices adopted will keep any adverse effects on the ecological integrity of the Plan Area to a minimum”.
- Section 25 of the Oak Ridges Moraine Conservation Act (ORMCA) states that in the event of a conflict between the ORMCA and any other general or special Act, the ORMCA prevails.

If there is to be a road, we have recommended a bridge across this 32 metre deep valley and not for a largely filled in road crossing with only a 80 metre long bridge and now an option for an even shorter 40 metres bridge. Such reduced bridge options will greatly increase the impacts to its key natural heritage features. The fill being proposed on either side of the road will increase the footprint from a 30-metre-wide road to a footprint up to 90 metres wide on the west side of the river crossing and up to 110 metres wide on the east side. It will more than double the losses to significant forests, ANSIs and the ORM Core Area to about 36.5 ha of significant forests and 32 ha of ANSI and ORM Core. It will reduce the forested valley corridor which is 550 metres wide at the unopened road allowance down to 25 metres wide at the river with the 40-metre bridge option (an additional 15 metres will be occupied by steeply sloping riverstone fill protection at the base of the bridge abutments). This will effectively reduce the wildlife corridor width by 95 percent. The only added wildlife passage in addition to this river crossing is an approximately 3 to 4 metre high and 4-metre-wide wildlife culvert through the cement wall just west of the bridge. The 80-metre bridge option will provide a 65 metre wide river crossing corridor which presents a reduction in corridor width of 88 percent.

The Ministry questions calling the area of sloping fill on either side of the elevated road to be a temporary impact on natural heritage features. For example, the 0.5 hectares (487 sq. m) of fill

deposited over the wetland is noted as a temporary impact. It should be a permanent impact since a wetland cannot be created on an area of upland fill. Calling the removal of 18.5 ha to 17.7 ha of significant forest, with about half supporting mature forests with trees over 100 years old, a temporary impact is also questionable. The fill placed on top of this once significant forest even with extensive plantings of 5- or 10-year tree saplings on the fill slopes will not become a comparable forest for many decades. A replacement that takes many decades cannot be considered a temporary impact. The areas of temporary impacts should be lumped into your permanent impacts.

Specific Comments on Environmental Impact Figures Identifying Potential Terrestrial and Aquatic Habitat Effects for 80 m and 40 m Bridge Span Options.

In your vegetation community mapping you have correctly used the provincially significant East Don River Headwater Wetland Complex mapping in your figures. As noted previously, the wetland boundary on the east side of the wetland complex in the study area has not been professionally surveyed. It may be off by a number of metres. For upland communities you relied on the Ecological Land Classification (ELC) mapping from the Toronto and Region Conservation Authority which was based on older 2001 fieldwork. Most of this mapping is still current and accurate however an examination of aerial imagery shows that two communities mapped as cultural savannahs with less than 25% tree canopy cover have grown over the past 22 years to have a canopy cover in excess of 25% and should be noted now as cultural woodlands (i.e., change CUS to CUW). As well, the CUS1-A now CUW1 community on the west side of the river does not extend as far south as shown on your mapping. Based on examination of aerial imagery it should end at the northern edge of the unopened road allowance.

In your tables, totals should be provided for each natural heritage feature column that sums up the areas of permanent and temporary impacts and the harmful alterations. Having totals across the rows should be removed since you are adding up features that overlap. For example, the ANSI area and ORM Core Area cover pretty much the same area as do the significant forests together with the wetlands.

It would be more understandable to do areas in hectares rather than square metres. The public has a better grasp of hectares and acres than it has of square metres.

The tables for the two bridge options appear to have a number of errors in the areas provided. For example, under the ORM Core, Significant Forest and ANSI columns the 80 metre bridge option has higher areas of permanent impacts and lower areas of harmful alterations than the 40 metre bridge option. One would expect the reverse since with a longer bridge there should be more area of harmful alteration under the bridge, while there should be less of a permanent impact from the road footprint. There is also an error in your wetland column with the 40-metre bridge option having only a 312 sq. metre permanent impact while the longer bridge has a permanent impact of 2189 sq. metres. This again is the reverse of what you should expect.

In the tables for the two figures, the areas of temporary impacts should be lumped in with your permanent impacts so there will only be a row for permanent impacts and a row for harmful alterations.

Thank you for the opportunity to comment on this project. Please let me know if you would like to discuss this further.

All the best

Steve and Catherine

From: Nick Crockford <NCrockford@morrisonhershfield.com>

Sent: September 19, 2023 1:00 PM

To: Warren, Catherine (She/Her) (MNRF) <Catherine.Warren@ontario.ca>; Thompson, Melinda (MNRF) <Melinda.Thompson@ontario.ca>; Varga, Steve (MNRF) <steve.varga@ontario.ca>

Cc: Andrew Harkness <AHarkness@morrisonhershfield.com>; Martin Blouin <MBlouin@morrisonhershfield.com>; Brandon, Philip <Philip.Brandon@york.ca>; John, Praveen <praveen.john@york.ca>

Subject: RE: Teston Road Individual Environmental Assessment: Project Update Discussions with MNRF

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Hello MNRF,

Please find attached for review and comment a Draft General Arrangement Drawing for the East Don River Tributary Bridge Crossing which features:

- A 40 m clear span between the abutments
- Vertical Retaining Walls (20 m walls parallel to roadway + 45-degree wing walls) in all 4 quadrants
- A Potential Wildlife Culvert on the west side of the tributary

Also attached is an updated set of Environmental Impact Figures identifying Potential Terrestrial and Aquatic Habitat Effects for 80 m and 40 m Bridge Span Options.

Highlights of the proposed 40 m Bridge Span Concept Plan include:

- Replacement of Existing Artificial Pond with a Natural Channel and Wetland Design
- Provision for a Wildlife Culvert (with length minimized)
- The design's hydraulic capacity far exceeds the design storm event flow rates.

Please return comments by September 29, 2023, so that these can be considered as part of our preparations for our final Open House. If you would like to meet to discuss the above/attached, please let us know.

Additionally, please find attached the meeting minutes and presentation from our June 8, 2023, meeting.

Thank you,

Nick Crockford

Environmental Planner



Suite 300, 125 Commerce Valley Drive West | Markham, ON L3T 7W4
416 499 3110

-----Original Appointment-----

From: Nick Crockford

Sent: Tuesday, June 6, 2023 3:37 PM

To: Nick Crockford; Warren, Catherine (She/Her) (MNRF); Thompson, Melinda (MNRF); Varga, Steve (MNRF); Andrew Harkness; Martin Blouin; Brandon, Philip; John, Praveen; Heather Kime; Victoria Cheng

Cc: Heather Wilton; Rebecca Lewis

Subject: Teston Road Individual Environmental Assessment: Project Update Discussions with MNRF

**York Region Teston Road Area Comprehensive Environmental Assessment Study
MNR Comment on the Teston Road Extension and the 40 and 80 Metre Bridge Options - DRAFT**

Item	MNR Comment (September 29, 2023)	Internal Comments
Oak Ridges Moraine Conservation Plan (ORMCP). MNR is concerned these policies have not been adequately considered:		
1	<p>The Ministry continues to question putting a road through the heart of a major valley of the East Don River that is recognized by the province as a Natural Core Area in the Provincial Oak Ridges Moraine (ORM) Conservation Plan that supports significant forests, many over 100 years old, provincially significant groundwater-fed wetlands, a coldwater fisheries, and an earth and life science Area of Natural and Scientific Interest (ANSI), all key natural heritage features in the ORM plan. As well, the East Don River valley in this area is part of a regional/provincial scale natural heritage system corridor that is designated by the province in the ORM Conservation Plan and the Greenbelt Plan. It is one of only two valley corridors for the Don River watershed providing a wildlife corridor connection south along the Don valley to Lake Ontario and north to the Moraine's major east-west corridor, and from their further north to river corridors draining into Lake Simcoe.</p> <p>Section 41 of the Oak Ridges Moraine Conservation Plan (ORMCP), particularly policies 3, 4 and 5, provide direction on limitations to development of infrastructure in Natural Core Areas, key natural heritage features and key hydrologic features which are present in this area. MNR is concerned that these policies contained in the Oak Ridges Moraine Conservation Plan (ORMCP) had not been adequately considered as there are alternatives to this proposal which include using existing roads to the north and south or constructing a bridge which spans the entire valley.</p> <p>In particular:</p> <ul style="list-style-type: none"> Section 41 (4) of the ORMCP explicitly prohibits the opening of a road in an unopened road allowance, unless a series of explicit requirements outlined in section 41(5) are first met. The requirements of 41(5) focus exclusively on minimizing disruption and maintaining the ecological integrity of the natural heritage features and their ecological function. 	<p>York Region has reviewed Section 41 of the ORMCP and acknowledges MNR's concerns regarding the environmentally important and sensitive lands within the Don River Tributary valley and potential effects associated with the recommended project design. The Region has undertaken extensive field studies and analysis to characterize the conditions within the study area and has committed through the EA to detailed additional studies and to mitigating the potential negative effects of the project. That Region commits to continue to adhere to the requirements of Sections 41 (4) and (5) of the ORMCP during the detailed design."</p> <p>The early phases of the EA have generated, analyzed, and evaluated various Alternatives to the Undertaking, including looking at using existing roads and a bridge that spans a longer portion of the valley. All evaluations throughout the project considered the evaluation criteria set out during the Terms of Reference. These criteria were approved by MECP during the ToR process and prior to the EA commencing.</p> <p>With respect to use of additional roadways to the north and south, the evaluation of these alternatives resulted in them being ruled out as the roadways are either at capacity and unable to be expanded and/or do not resolve the traffic issues. Expansion of these roadways is also generally not aligned with York Region's current policies, resulted in large property impacts, or also result in impacts to the Natural Core Areas of the ORM (Kirby Road for example).</p> <p>Additionally, the EA looked at corridor and alignment alternatives to connect Teston Road between Keele Street and Dufferin Street, but again, the evaluations resulted in the recommended alignment alternative as currently proposed.</p> <p>Lastly, an evaluation of alternatives was undertaken to assess bridge / crossing alternatives of the Don River Valley Tributary. Three alternatives were reviewed with varying span lengths but due to a variety of factors, the single span bridge was selected and further refined from 80 m to 40m due to cost considerations and the limited additional benefits provided of an 80 m vs. 40 m span.</p> <p>In response to MNR's and TRCA's concerns York Region now proposes to increase the proposed span of the Teston Road bridge over the Don River East Branch from approximately 45 m to 50 m (with the clear span to increase from 40 m to 45 m) and to modify the provisions for active transportation trail facilities below the bridge and the footing scour protection to increase the unconstrained ground level opening and available meander belt width from 25 m to approximately 43.1 m.</p> <p>The EA report has considered the potential effects of the project and recommends mitigation measures to address potential project effects including restoration / compensation strategies. Recommendations include:</p> <ul style="list-style-type: none"> Ecosystem compensation recommendations have been quantified for permanent loss areas, in accordance with the TRCA's Guideline for Determining Ecosystem Compensation (2023). Recommended replacement ratios for the project vary from 1:1 to 5:1 depending on the ELC community. The EA Report recommends over 12 hectares of ecosystem compensation. Potential compensation locations have been identified in the vicinity of the project. A Wetland and Significant Wildlife Habitat Restoration Plan will be developed to accurately characterize these areas, identify opportunities to minimize impacts, and to develop appropriate mitigation and restoration measures for any impacts in consultation with the MNR. Key considerations at detailed design will be ensuring maintenance of wetland connectivity and appropriate restoration or compensation of wetlands. Enhancement measures implemented as part of the restoration plan will consider and complement confirmed SWH within the project limits, and may include turtle nesting areas, turtle basking areas, reptile hibernacula, bat houses, duck nesting structures, and more. A Wildlife Crossing Plan will be developed as part of detailed design considering wildlife crossing for deer, small mammals, turtles, and amphibians. This will include wildlife fencing alongside the road within and adjacent to habitat for these species to tie in with wildlife crossings and encourage use by wildlife. Wildlife passages should be implemented in suitable locations, should be of sufficient size, and should be designed with features that facilitate wildlife movement across the roadway.

		<ul style="list-style-type: none"> • A Vegetation Restoration Plan will be developed to reinstate lost vegetation within negative impact and harmful alteration areas within the project footprint. Key measures will include planting of native species providing similar or superior benefit to potentially impacted wildlife. • Restoration and planting plans within and adjacent to wetlands and along the tributary will focus on improving riparian conditions and functions to improve habitat quality and water quality at the bridge as well as downstream. • There is an opportunity to take the existing pond [Duckweed Floating-leaved Shallow Aquatic (SAF1-3) community] off-line by rerouting the existing watercourse around the pond, improving habitat quality within the watercourse for fish, while still ensuring maintenance of wetland habitat within the pond for amphibians and other wildlife. This change also provides the opportunity to better allow for wildlife passage (as requested by TRCA). This pond is located on private property therefore this recommendation will need to be addressed in conjunction with the adjacent property owner and developer. DFO will be consulted (i.e., through submission of a Request for Review) on any changes made to existing fish habitat, as a Fisheries Act Authorization may be required to complete this work.
2	<ul style="list-style-type: none"> • The ORMCP states the following in both Policy 41(2)(b)(5) and 41(5)(b): <i>“The planning, design and construction practices adopted will keep any adverse effects on the ecological integrity of the Plan Area to a minimum”.</i> 	See above.
3	<ul style="list-style-type: none"> • Section 25 of the Oak Ridges Moraine Conservation Act (ORMCA) states that in the event of a conflict between the ORMCA and any other general or special Act, the ORMCA prevails. 	Comment acknowledged.
Comments on the design of the Valley		
4	<p>On the length of the bridge:</p> <ul style="list-style-type: none"> • Reduced bridge options will greatly increase the impacts to its key natural heritage features. The fill being proposed on either side of the road will increase the footprint from a 30-metre-wide road to a footprint up to 90 metres wide on the west side of the river crossing and up to 110 metres wide on the east side. • It will more than double the losses to significant forests, ANSIs and the ORM Core Area to about 36.5 ha of significant forests and 32 ha of ANSI and ORM Core. • It will reduce the forested valley corridor which is 550 metres wide at the unopened road allowance down to 25 metres wide at the river with the 40-metre bridge option (an additional 15 metres will be occupied by steeply sloping riverstone fill protection at the base of the bridge abutments). This will effectively reduce the wildlife corridor width by 95 percent. 	<p>Shorter span bridge options will increase the potential project impacts to natural heritage features in the valley vs. longer span bridge options. As noted above, the EA report has considered the potential effects of the project and recommends mitigation measures to address potential project effects including restoration / compensation strategies. These include measures to address potential footprint effects; impacts to forests, ANSIs and ORM Core Area, and wildlife passage.</p> <p>Note that the EA Natural Science Report identifies approximately 6.0 ha. of permanent loss, 2.5 ha. of Negative Impact and 0.1 ha. of Harmful Alteration to various ELC Vegetation Communities for the entire project – for which mitigation/restoration/compensation strategies are proposed. The total areas of potential impact to significant forests, ANSIs and ORM Core Area are much lower than shown at left.</p> <p>Opportunities for refinement to the EA recommended design will be possible at the detail design stage of the project.</p> <p>In response to MNR’s and TRCA’s concerns York Region now proposes to increase the proposed span of the Teston Road bridge over the Don River East Branch from approximately 45 m to 50 m (with the clear span to increase from 40 m to 45 m) and to modify the provisions for active transportation trail facilities below the bridge and the footing scour protection to increase the unconstrained ground level opening and available meander belt width from 25 m to approximately 43.1 m.</p>

	<ul style="list-style-type: none"> The only added wildlife passage in addition to this river crossing is an approximately 3 to 4 metre high and 4-metre-wide wildlife culvert through the cement wall just west of the bridge. The 80-metre bridge option will provide a 65 metre wide river crossing corridor which presents a reduction in corridor width of 88 percent. 	
5	<p>On calling things “temporary impacts”. The Ministry questions calling the area of sloping fill on either side of the elevated road to be a temporary impact on natural heritage features.</p> <ul style="list-style-type: none"> The 0.5 hectares (487 sq. m) of fill deposited over the wetland is noted as a temporary impact. It should be a permanent impact since a wetland cannot be created on an area of upland fill. Calling the removal of 18.5 ha to 17.7 ha of significant forest, with about half supporting mature forests with trees over 100 years old, a temporary impact is also questionable. The fill placed on top of this once significant forest even with extensive plantings of 5- or 10-year tree saplings on the fill slopes will not become a comparable forest for many decades. A replacement that takes many decades cannot be considered a temporary impact. The areas of temporary impacts should be lumped into your permanent impacts. 	<p>The Natural Environment Report has been updated to change “temporary impacts” to “negative impacts”. This acknowledges that the word temporary may not be the most suitable, but also differentiates areas that can be restored from permanently unavailable habitat areas (e.g., paved areas). Terms have been updated in the Natural Environment Report to permanent loss, negative impact, and harmful alteration areas.</p> <p>Ecosystem compensation recommendations have been quantified for permanent loss areas, in accordance with the TRCA’s Guideline for Determining Ecosystem Compensation (2023). Recommended replacement ratios for the project vary from 1:1 to 5:1 depending on the ELC community. The EA Report recommends over 12 hectares of ecosystem compensation. Potential compensation locations have been identified in the vicinity of the project.</p>
Specific Comments on Env Impact Figures Identifying Potential Terrestrial/Aquatic Habitat Effects for 80m and 40m Bridge Span Options		
6	<p>Concerns regarding mapping accuracy:</p> <ul style="list-style-type: none"> As noted previously, the wetland boundary on the east side of the wetland complex in the study area has not been professionally surveyed. It may be off by a number of metres. For upland communities you relied on the Ecological Land Classification (ELC) mapping from the Toronto and Region Conservation Authority which was based on older 2001 fieldwork. Most of this mapping is still current and accurate however an examination of aerial imagery shows that two communities mapped as cultural savannahs with less than 25% tree canopy cover have grown over the past 22 years to have a canopy cover in excess of 25% and should be noted now as cultural woodlands (i.e., change CUS to CUW). As well, the CUS1-A now CUW1 community on the west side of the river does not extend as far south as 	<p>Potential inaccuracy of wetland boundaries is acknowledged. The Natural Environment Report includes a recommendation for wetland boundary delineation at the detail design stage of the project.</p> <p>The Natural Environment Report has been updated to change these CUSs to CUWs and adjustments have been made to the CUW boundaries, as requested.</p>

	shown on your mapping. Based on examination of aerial imagery it should end at the northern edge of the unopened road allowance.	
7	In your tables, totals should be provided for each natural heritage feature column that sums up the areas of permanent and temporary impacts and the harmful alterations. Having totals across the rows should be removed since you are adding up features that overlap. For example, the ANSI area and ORM Core Area cover pretty much the same area as do the significant forests together with the wetlands.	We have provided totals by natural heritage feature for different types of impacts but have removed totals that include overlapping areas of impact, as requested.
8	It would be more understandable to do areas in hectares rather than square metres. The public has a better grasp of hectares and acres than it has of square metres.	Hectares have added to the Natural Environment Report, as requested.
9	<p>Errors in the areas provided for the tables for the two bridge options:</p> <ul style="list-style-type: none"> • For example, under the ORM Core, Significant Forest and ANSI columns the 80 metre bridge option has higher areas of permanent impacts and lower areas of harmful alterations than the 40 metre bridge option. One would expect the reverse since with a longer bridge there should be more area of harmful alteration under the bridge, while there should be less of a permanent impact from the road footprint. • There is also an error in your wetland column with the 40-metre bridge option having only a 312 sq. metre permanent impact while the longer bridge has a permanent impact of 2189 sq. metres. This again is the reverse of what you should expect. 	Corrections have been made to Natural Environment Report. Some values have also been changed due to changes in ELC limits (e.g., slightly greater impacts within L3 communities).
10	In the tables for the two figures, the areas of temporary impacts should be lumped in with your permanent impacts so there will only be a row for permanent impacts and a row for harmful alterations.	As above (#5), "temporary impacts" have been changed to "negative impacts" to address this concern, but they have been distinct in order to differentiate restorable areas.

APPENDIX E-5 – Metrolinx

Cheng, Victoria

Subject: RE: Notice of Public Review - Teston Road Area Improvements IEA

From: Crockford, Nick

Sent: Wednesday, November 27, 2024 8:31 AM

To: Tony Italiano <Calogero.Italiano@metrolinx.com>

Cc: Third Party Projects <ThirdPartyProjects@metrolinx.com>; Cheung, Billy <Billy.Cheung@york.ca>; Harkness, Andrew <Andrew.Harkness@stantec.com>; John, Praveen <praveen.john@york.ca>

Subject: RE: Notice of Public Review - Teston Road Area Improvements IEA

Hi Tony,

Thank you for your confirmation of receipt for the notice of IEA for the Teston Road Area Improvements project. Upon approval of the EA by MECP, York Region will proceed with detailed design of an initial at-grade rail crossing on Teston Road east of Keele Street. The Region will continue to work with Metrolinx for approval and permitting needs during detailed design and throughout the duration of the project.

If you have any additional questions or concerns, please let us know.

Thank you,

Nick Crockford B.E.S., M.E.S.

Environmental Planner

437 872-2838

Nick.Crockford@stantec.com

Stantec

300-125 Commerce Valley Drive West

Markham ON L3T 7W4



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From: Tony Italiano <Calogero.Italiano@metrolinx.com>

Sent: Monday, November 18, 2024 9:18 AM

To: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>

Cc: Third Party Projects <ThirdPartyProjects@metrolinx.com>

Subject: FW: Notice of Public Review - Teston Road Area Improvements IEA

Hello,

Please be advised that any work that has potential to come within 30 feet of the track, any excavation that enters our zone of influence or any work that would impact the flow of traffic over our at grade crossing will require a work permit.

For more information please visit our website - [Constructing On/Near Metrolinx Corridors](#)

Thanks,

Tony Italiano C.Tech., PMP

Project Manager, Third Party Capital Infrastructure Coordination

Capital Projects Group, Metrolinx

20 Bay Street, Suite 600, Toronto, Ontario, **M5J 2W3**

T: 416-202-0655 C: 437-993-1365

E: calogero.italiano@metrolinx.com

W: [Constructing On/Near Metrolinx Corridors](#)



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From: Third Party Projects <ThirdPartyProjects@metrolinx.com>
Sent: Friday, November 8, 2024 2:38 PM
To: Tony Italiano <Calogero.Italiano@metrolinx.com>
Subject: FW: Notice of Public Review - Teston Road Area Improvements IEA

Good afternoon Tony,

This one is on Newmarket Sub I believe

Best regards,
Harrison

From: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Sent: Friday, November 8, 2024 11:42 AM
To: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Subject: Notice of Public Review - Teston Road Area Improvements IEA

Some people who received this message don't often get email from mh-testonroadareaiea@stantec.com. [Learn why this is important](#)

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Dear Sir/Madam,

On behalf of the Regional Municipality of York, please see attached notice for the Teston Road Area Transportation Improvements Individual Environmental Assessment in the City of Vaughan.

Please provide your review of the draft Individual Environmental Assessment Report by **December 22, 2024**. Comments can be provided to:

York Region Transportation, Public Works

Phone: 1-877-464-9675 ext. 75000

TTY: 1-866-512-6228

Email: transportation@york.ca

To better assist you, please quote Teston Road IEA in your inquiry.

Thank you,

Teston Road IEA Study Team

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**Summary of Agency Comments on Draft CEA Report (2024)
Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

EA Comment Summary		
EA Section Reference	Summary of Comment	Proponent Response
Metrolinx (November 18, 2024)		
Section 11.3 Permit Approvals	<p>Please be advised that any work that has potential to come within 30 feet of the track, any excavation that enters our zone of influence or any work that would impact the flow of traffic over our at grade crossing will require a work permit.</p> <p>For more information please visit our website - Constructing On/Near Metrolinx Corridors</p>	<p>York Region will continue to work with Metrolinx for approval and permitting needs during detailed design and throughout the duration of the project. This permitting requirement has been captured in Section 11.3 of the EA report.</p>

**APPENDIX E-6 – Ministry of
Citizenship and Multiculturalism**

Harkness, Andrew

From: Smythe, Liam (He/Him) (MCM) <Liam.Smythe@ontario.ca>
Sent: Tuesday, December 17, 2024 1:07 PM
To: transportation@york.ca
Cc: MH-TestonRoadAreaIEA; Barboza, Karla (She/Her) (MCM); Hamilton, James (MCM); Batista, Cindy (MECP)
Subject: MCM Response - Notice of Public Review - Teston Road Area Improvements IEA [MCM File #0006139]
Attachments: 2024-12-17_TestonRdIEA_MCMComments.pdf

Good afternoon,

Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the Notice of Public Review for the Teston Road Area Improvements Individual EA.

Please find MCM's comments on the EA report attached. Do not hesitate to contact us if you have any questions or require additional information.

Best regards,

Liam Smythe, CAHP (he/him)
Heritage Planner | Citizenship, Inclusion and Heritage Division
Ministry of Citizenship and Multiculturalism | Ontario Public Service
416-301-4797 | Liam.Smythe@ontario.ca



Taking pride in strengthening Ontario, its places and its people

From: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Sent: Friday, November 8, 2024 11:42 AM
To: MH-TestonRoadAreaIEA <MH-TestonRoadAreaIEA@stantec.com>
Subject: Notice of Public Review - Teston Road Area Improvements IEA

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Dear Sir/Madam,

On behalf of the Regional Municipality of York, please see attached notice for the Teston Road Area Transportation Improvements Individual Environmental Assessment in the City of Vaughan.

Please provide your review of the draft Individual Environmental Assessment Report by **December 22, 2024**. Comments can be provided to:

York Region Transportation, Public Works
Phone: 1-877-464-9675 ext. 75000
TTY: 1-866-512-6228
Email: transportation@york.ca

To better assist you, please quote Teston Road IEA in your inquiry.

Thank you,

Teston Road IEA Study Team

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**Ministry of Citizenship
and Multiculturalism**

Heritage Planning Unit
Heritage Operations Branch
Citizenship, Inclusion and
Heritage Division
5th Flr, 400 University Ave
Toronto, ON M5G 1S7
Tel.: 416-301-4797

**Ministère des Affaires civiques
et du Multiculturalisme**

Planification relative au patrimoine
Opérations relatives au patrimoine
Division des affaires civiques, de
l'inclusion et du patrimoine
5e étage, 400, av. University
Toronto, ON M5G 1S7
Tél.: 416-301-4797



December 17, 2024

EMAIL ONLY

Teston Road IEA Study Team
York Region Transportation
Public Works Department
17250 Yonge Street
Newmarket, ON L3Y 6Z1
transportation@york.ca

MCM File : **0006139**
Proponent : **Regional Municipal of York**
Subject : **Individual Environmental Assessment (IEA) – Notice of Public Review - Draft IEA Report**
Project : **Teston Road Area Transportation Improvements – from Highway 400 to Bathurst Street and from Major Mackenzie Drive West to Kirby Road**
Location : **City of Vaughan, York Region, Ontario**

Dear Teston Road IEA Study Team:

Thank you for providing the Ministry of Citizenship and Multiculturalism (MCM) with the Notice of Public Review for the above-referenced project and for making the draft IEA Report available for our review.

MCM's interest in this Environmental Assessment (EA) project relates to its mandate of conserving Ontario's cultural heritage.

Project Summary

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. To address transportation challenges in the area, the study considered improvements for vehicles, pedestrians, cyclists and transit.

Comments

We have reviewed the following documents:

- *Draft Report – Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street* (prepared by Morrison-Hershfield, now Stantec, dated August 15, 2024)
- *Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment – Teston Road – Highway 400 to Bathurst Street Individual Environmental Assessment –*

City of Vaughan, Region of York, Ontario (prepared by ASI, dated August 2020, updated May and July 2024)

- *Stage 2 Archaeological Assessment Teston Road - Highway 400 to Bathurst Street Individual Environmental Assessment Part of Lots 25 and 26, Concessions 2 and 3, and Part of Lot 26, Concession 4 (Geographical Township of Vaughan, County of York) City of Vaughan, Regional Municipality of York* (prepared by ASI, dated March 11, 2024)

Archaeological Resources

A Stage 1 archaeological assessment (AA) under Project Information Form P089-0097-2018, was carried out for the Teston Road IEA and the associated report has been entered into the Ontario Public Register of Archaeological Reports ('the Register'). The Stage 1 AA recommended Stage 2 AA for parts of the study area. Our records indicate that a Stage 2 AA (under PIF P1066-0310-2022) was carried out. The associated report was submitted to MCM and is under review.

Please note that archaeological concerns have not been fully addressed until reports have been entered into the Register. Approval authorities and/or proponents should wait to receive MCM's written confirmation that the archaeological assessment report(s) has been entered into the Register before issuing a decision or proceeding with any ground disturbing activities. The letter will also indicate either that there are no further concerns for impacts to archaeological resources or articulate next steps to mitigate those concerns.

Proponents must follow the recommendations of the archaeological assessment report(s). MCM recommends that further stages of archaeological assessment be undertaken as early as possible during detailed design and prior to any ground disturbing activities.

The results and recommendations of the Stage 2 AA are summarized in Sections 5.5.2 and 10.5.1 of the draft IEA Report. As the Stage 2 report is under review, the results and recommendations should be considered preliminary, and MCM may have additional comments once the Stage 2 report has been entered into the Register.

Built Heritage Resources and Cultural Heritage Landscapes

A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (CHR) was completed for the Teston Road IEA – see reference above. The results and recommendations of the CHR are summarized in Sections 5.5.1 and 10.5.1 of the draft IEA report. A total of 18 known and 37 potential built heritage resources (BHRs) and cultural heritage landscapes (CHLs) were identified within the Teston Road IEA study area. The CHR was updated in 2024, and identified one BHR and five CHLs that are within or adjacent to the proposed Teston Road extension alignments and have the potential to be impacted by the project.

MCM provided comments on the draft CHR in September 2020. All comments provided at that time have been addressed in the updated report or are no longer applicable due to the refined Teston Road extension alignments study area.

We have reviewed the above-referenced Cultural Heritage Report and draft IEA report and find them to be consistent overall with the approved Terms of Reference, and with best practice guidance prepared by MCM. We have included some section-specific comments, on the draft IEA Report in the attached table to ensure the report aligns with current legislation and terminology.

Thank you for the opportunity to review the draft IEA Report for this project. If you have any questions or require clarification, please do not hesitate to contact me.

Sincerely,

Liam Smythe
Heritage Planner
Liam.Smythe@ontario.ca

Copied to:

Karla Barboza, Team Lead, Heritage Planning Unit, MCM
James Hamilton, Manager, Heritage Planning Unit, MCM
Cindy Batista, Project Officer, MECP

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. The Ministry of Citizenship and Multiculturalism (MCM) makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MCM be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Should previously undocumented archaeological resources be discovered, they may be a new archaeological site and therefore subject to Section 48(1) of the *Ontario Heritage Act*. The proponent or person discovering the archaeological resources must cease alteration of the site immediately and engage a licensed consultant archaeologist to carry out an archaeological assessment, in compliance with Section 48(1) of the *Ontario Heritage Act*.

The *Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33* requires that any person discovering human remains must cease all activities immediately and notify the police or coroner. If the coroner does not suspect foul play in the disposition of the remains, in accordance with *Ontario Regulation 30/11* the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the Ministry of Citizenship and Multiculturalism should also be notified (at archaeology@ontario.ca) to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.

Comment #	Reference to ESR Section	Comment	Proposed Action/Solution
1.	General Comment	<p>There is inconsistency in the way the Cultural Heritage Report is referenced throughout the IEA Report, being variously referred to as a 'Cultural Heritage Assessment Report', 'Cultural Heritage Report', etc.</p> <p>For consistency and accuracy, the report should be referred to by its full, correct title, or abbreviated as Cultural Heritage Report.</p>	Ensure all references to the Cultural Heritage Report refer to the report by its full, correct title: "Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment" or abbreviated as "Cultural Heritage Report".
5.	<p>Table 2-2 - Types of Potential Environmental Effects from the ToR</p> <p>p. 19</p>	The bullets provided in the 'Cultural' column should be revised to align with current legislation and terminology.	<p>Revise bullets as follows:</p> <ul style="list-style-type: none"> • Alteration/displacement of known and not yet known archaeological sites and areas of archaeological potential • Discovery/documentation of not yet known new archaeological sites • Disruption or loss of built heritage sites resources and cultural heritage landscapes • Potential protection/preservation of cultural heritage resources/archaeological sites • Disturbance to lands with significant archaeological potential Disturbance/alteration to Indigenous sites (we suggest that the term be clarified, for example, is it archaeological sites affiliated with Indigenous communities?)
2.	<p>5.5.3 – Cultural Heritage Resources</p> <p>p. 122</p>	Archaeological resources, built heritage resources, and cultural heritage landscapes are all considered to be 'cultural heritage resources'. As archaeological resources are discussed separately in the preceding subsection, the title of this subsection should be revised to 'Built Heritage Resource and Cultural Heritage Landscapes'.	Revise subsection title to ' Built Heritage Resources and Landscapes '
3.	<p>10.5.2 – Built Heritage</p> <p>p. 292</p>	Similar to Comment #3 above, the title of this subsection should be revised to 'Built Heritage Resources and Cultural Heritage Landscapes'.	Revise subsection title to 'Built Heritage Resources and Cultural Heritage Landscapes '

Comment #	Reference to ESR Section	Comment	Proposed Action/Solution
4.	11.2.5 – <i>Cultural Heritage – Heritage Impact Assessment and Vibration Studies</i> p. 304-305	Similar to Comment #3 above, the title of this subsection should be revised to reference 'Built Heritage Resources and Cultural Heritage Landscapes'	Revise subsection title to ' Built Heritage Resources and Cultural Heritage Landscapes – Heritage Impact Assessment and Vibration Studies', or 'Heritage Impact Assessment and Vibration Studies'.

**Summary of Agency Comments on Draft CEA Report (2024)
Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

EA Comment Summary		
EA Section Reference	Summary of Comment	Proponent Response
Ministry of Citizenship and Multiculturalism (December 18, 2024)		
General	Ensure all references to the Cultural Heritage Report refer to the report by its full, correct title: "Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment" or abbreviated as "Cultural Heritage Report".	Edits have been made throughout the EA Report to address the comment at left.
Table 2-2 Types of Potential Environmental Effects from the ToR	<p>The bullets provided in the 'Cultural' column should be revised to align with current legislation and terminology.</p> <p>Revise bullets as follows:</p> <ul style="list-style-type: none"> • Alteration/displacement of known and not yet known archaeological sites and areas of archaeological potential • Discovery/documentation of not yet known new archaeological sites • Disruption or loss of built heritage sites resources and cultural heritage landscapes • Potential protection/preservation of cultural heritage resources/archaeological sites • Disturbance to lands with significant archaeological potential <p>Disturbance/alteration to Indigenous sites (we suggest that the term be clarified, for example, is it archaeological sites affiliated with Indigenous communities?)</p>	Updates have been made to Table 2-2 (which was carried forward from the Terms of Reference). With respect to the last bullet point, we have deleted this bullet as we feel the remaining bullets capture the effects that were examined.
S. 5.5.3 Cultural Heritage Resources	<p>Archaeological resources, built heritage resources, and cultural heritage landscapes are all considered to be 'cultural heritage resources'. As archaeological resources are discussed separately in the preceding subsection, the title of this subsection should be revised to 'Built Heritage Resource and Cultural Heritage Landscapes'.</p> <p>Revise subsection title to 'Built Heritage Resources and Cultural Heritage Landscapes'</p>	The title for Section 5.5.3 has been updated as noted at left.
10.5.2 Built Heritage	Revise subsection title to 'Built Heritage Resources and Cultural Heritage Landscapes'	The title for Section 10.5.2 has been updated as noted at left.
11.2.5 Cultural Heritage Impact Assessment and Vibration Studies	Revise subsection title to 'Built Heritage Resources and Cultural Heritage Landscapes – Heritage Impact Assessment and Vibration Studies', or 'Heritage Impact Assessment and Vibration Studies'.	The title for Section 11.2.5 has been updated as noted at left.

**APPENDIX E-7 – Ministry of the
Environment, Conservation and
Parks**

From: [protection_source \(MECP\)](#)
To: [Hadlari, Wai \(MECP\)](#); [Batista, Cindy \(MECP\)](#)
Cc: [Lemke, Monika \(She/Her\) \(MECP\)](#)
Subject: RE: Draft EA Submission: Teston Road
Date: Tuesday, September 3, 2024 11:02:16 AM
Attachments: [image002.png](#)
[image003.png](#)

Hello Cindy and Wai,

Thank you for providing Conservation and Source Protection Branch (CSPB) with the opportunity to comment on the City of Vaughn's consultation materials for the Teston Road IEA. No further comments from a source protection perspective.

All best,
Monika

Monika Lemke (she/her)

Program Analyst | Conservation and Source Protection Branch | Land and Water Division
Ministry of the Environment, Conservation and Parks | Ontario Public Service
(613) 876-3376 | monika.lemke@ontario.ca



Taking pride in strengthening Ontario, its places and its people.

From: Lemke, Monika (She/Her) (MECP)
Sent: Tuesday, August 27, 2024 9:26 AM
To: Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Hi Wai,

Yes, it does. Thank you very much!

Best,
Monika

From: Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Sent: Monday, August 26, 2024 4:10 PM
To: Lemke, Monika (She/Her) (MECP) <Monika.Lemke@ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Hi Monika,

I hope this link will work for you: [☐ Teston Rd.](#)

Please let me know.

Wai

From: Lemke, Monika (She/Her) (MECP) <Monika.Lemke@ontario.ca>
Sent: Monday, August 26, 2024 1:32 PM
To: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Hello Cindy and Wai,

I have been assigned the EA review for CSPB (a source water protection perspective). At the moment, I cannot access the Teston Road EA folder. I would much appreciate your assistance with access.

All best,
Monika

Monika Lemke (she/her)

Program Analyst | Conservation and Source Protection Branch | Land and Water Division
Ministry of the Environment, Conservation and Parks | Ontario Public Service
(613) 876-3376 | monika.lemke@ontario.ca



Taking pride in strengthening Ontario, its places and its people.

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Sent: Thursday, August 22, 2024 2:08 PM
To: Brown, Andrea (MECP) <Andrea.J.Brown@ontario.ca>; Martella, Anthony (MECP) <Anthony.Martella@ontario.ca>; Fancott, Patrick (MECP) <Patrick.Fancott@ontario.ca>; Kourktchan, Sabina (She/Her) (MECP) <Sabina.Kourktchan@ontario.ca>; Ajderian, Karin (MECP) <Karin.Ajderian@ontario.ca>; Source Protection Screening (MECP) <SourceProtectionScreening@ontario.ca>; Species at Risk (MECP) <SAROntario@ontario.ca>; Dugas, Celeste (MECP) <Celeste.Dugas@ontario.ca>; Belayneh, Ted (MECP) <Ted.Belayneh@ontario.ca>; Sones, Kristen (She/Her) (MECP) <Kristen.Sones@ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Desautels, Solange (MECP) <Solange.Desautels@ontario.ca>
Subject: Draft EA Submission: Teston Road

Importance: High

Hello Everyone,

The ministry has received a draft environmental assessment report for the proposed Teston Road. The Terms of Reference for this project was approved in December 2018 to study transportation improvements within the Teston Road area, from Highway 400 to east of Bathurst Street in the City of Vaughan.

The draft EA and supporting technical reports can be found here: [☐ Teston Road EA](#). Please let me know if you can't access the reports. Reports that are of interest to our mandates are as follows:

- Environmental Assessment Study
- Appendix E – Natural Environmental Report
- Appendix F – Arborist Report
- Appendix G – Noise Study
- Appendix H – Air Quality Study
- Appendix K – Drainage and SWM Report
- Appendix L – Hydrogeology Report
- Appendix M – Contamination Overview Report
- Appendix O – Soil Investigation Report
- Appendix P – Fluvial Geomorphology Report
- Appendix Q – Climate Change

I will be sending a separate request for Central Region Staff through ECHO.

The Environmental Assessment Branch is requesting staff comments by September 20th, 2024.

Please reach out if you have any questions.

Thank you.

Cindy Batista | Special Project Officer | Transit Coordinator (she/her)
Environmental Assessment Services | Environmental Assessment Branch
Ministry of the Environment, Conservation & Parks
135 St. Clair Avenue West, 1st Floor, Toronto, ON M4V 1P5
Phone: 437-248-0058 | Email: cindy.batista@ontario.ca

If you have any accommodation needs or require communication supports or alternate formats, please let me know.

Si vous avez des besoins en matière d'adaptation, ou si vous nécessitez des aides à la communication ou des médias substitués, veuillez me le faire savoir.

From: [Andersen, Jeff \(MECP\)](#)
To: [Batista, Cindy \(MECP\)](#)
Cc: [Tuyten, Nicole \(MECP\)](#)
Subject: RE: Draft EA Submission: Teston Road - email 1
Date: Tuesday, September 10, 2024 9:22:25 AM
Attachments: [image001.png](#)
[image002.png](#)

Cindy;

I have reviewed the EA and have the same comment in that the client may require some form of permission from MECP Permissions Section.

For your awareness, Permissions Staff have been in contact with the client for many years and have had several face-to-face meetings concerning Teston Road. The client is aware that a separate submission specific to an *Endangered Species Act* review is required.

Thank you

JJA

Jeff J. Andersen

Management Biologist | Permissions Section, Species at Risk Branch
Ministry of the Environment, Conservation & Parks | Ontario Public Service
289-221-1705 | jeff.andersen@ontario.ca



Taking pride in strengthening Ontario, its places and its people

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Sent: Friday, August 23, 2024 11:26 AM
To: Andersen, Jeff (MECP) <Jeff.Andersen@ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Subject: RE: Draft EA Submission: Teston Road - email 1

Hello Jeff:

Thank you for your email and letting me know that you can't access the files.

There is a lot of public interest on this file and we want to ensure our due diligence. The proposed road has the following significant natural features:

- Portions of the study area are within Oak Ridges Moraine Plan boundary and as such must adhere to specific policies for any development of infrastructure including demonstrating a need for the project and adhering to strict environmental policies and studies;

- An existing protected Huron Wendat ossuary in the study area near Teston Road and Jane Street;
- The East Don River Valley natural area, which is both an environmentally sensitive area and an area of natural and scientific Interest and is designated as a natural core area which requires the highest level of protection under the Oak Ridges Moraine Plan.

As I result, I want to ensure that you have access to the draft EA report for your review, as well as the natural environmental report (which I will send separately following this email).

Cindy

From: Andersen, Jeff (MECP) <Jeff.Andersen@ontario.ca>
Sent: Friday, August 23, 2024 8:32 AM
To: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Cindy;

I do not have access to this file, however, MECP Permissions staff note that “Permissions may be required under the *Endangered Species Act* and, to that end, species at risk studies may need to be undertaken”.

Regards;

JJA

Jeff J. Andersen

Management Biologist | Permissions Section, Species at Risk Branch
Ministry of the Environment, Conservation & Parks | Ontario Public Service
289-221-1705 | jeff.andersen@ontario.ca



Taking pride in strengthening Ontario, its places and its people

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Sent: Thursday, August 22, 2024 2:08 PM
To: Brown, Andrea (MECP) <Andrea.J.Brown@ontario.ca>; Martella, Anthony (MECP)

<Anthony.Martella@ontario.ca>; Fancott, Patrick (MECP) <Patrick.Fancott@ontario.ca>; Kourktchan, Sabina (She/Her) (MECP) <Sabina.Kourktchan@ontario.ca>; Ajderian, Karin (MECP) <Karin.Ajderian@ontario.ca>; Source Protection Screening (MECP) <SourceProtectionScreening@ontario.ca>; Species at Risk (MECP) <SAROntario@ontario.ca>; Dugas, Celeste (MECP) <Celeste.Dugas@ontario.ca>; Belayneh, Ted (MECP) <Ted.Belayneh@ontario.ca>; Sones, Kristen (She/Her) (MECP) <Kristen.Sones@ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Desautels, Solange (MECP) <Solange.Desautels@ontario.ca>

Subject: Draft EA Submission: Teston Road

Importance: High

Hello Everyone,

The ministry has received a draft environmental assessment report for the proposed Teston Road. The Terms of Reference for this project was approved in December 2018 to study transportation improvements within the Teston Road area, from Highway 400 to east of Bathurst Street in the City of Vaughan.

The draft EA and supporting technical reports can be found here: [☐ Teston Road EA](#). Please let me know if you can't access the reports. Reports that are of interest to our mandates are as follows:

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- Appendix E – Natural Environmental Report
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- Appendix G – Noise Study
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- Appendix L – Hydrogeology Report
- Appendix M – Contamination Overview Report
- Appendix O – Soil Investigation Report
- Appendix P – Fluvial Geomorphology Report
- Appendix Q – Climate Change

I will be sending a separate request for Central Region Staff through ECHO.

The Environmental Assessment Branch is requesting staff comments by September 20th, 2024.

Please reach out if you have any questions.

Thank you.

Cindy Batista | Special Project Officer | Transit Coordinator (she/her)
Environmental Assessment Services | Environmental Assessment Branch
Ministry of the Environment, Conservation & Parks

135 St. Clair Avenue West, 1st Floor, Toronto, ON M4V 1P5

Phone: 437-248-0058 | Email: cindy.batista@ontario.ca

If you have any accommodation needs or require communication supports or alternate formats, please let me know.

Si vous avez des besoins en matière d'adaptation, ou si vous nécessitez des aides à la communication ou des médias substitués, veuillez me le faire savoir.

From: [Fair, Jason \(MECP\)](#)
To: [Batista, Cindy \(MECP\)](#)
Cc: [Mazin, Craig \(MECP\)](#); [Soares, Rosemary \(MECP\)](#)
Subject: RE: Draft EA Submission: Teston Road
Date: Tuesday, September 17, 2024 4:00:03 PM
Attachments: [image001.png](#)

Hi again Cindy,

I have completed a review of the submission on behalf of my branch and can confirm that we do not have any comments to provide.

Thanks and all the best,
Jason

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Sent: Tuesday, September 17, 2024 11:14 AM
To: Fair, Jason (MECP) <Jason.Fair@ontario.ca>
Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Hello Jason.

Thanks for reaching out and my apologies for your troubles accessing the EA. Here is the link:  [Teston Rd.](#)

Please let me know if you still can't access the reports.

Cindy

From: Fair, Jason (MECP) <Jason.Fair@ontario.ca>
Sent: Tuesday, September 17, 2024 10:28 AM
To: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road

Good morning Cindy,

I am reviewing this proposal for Climate Change Policy Branch. I just tried to access the shared folder and got a 404 not found message.

Please let me know how I can access the files.

Thanks so much,
Jason

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>

Sent: Thursday, August 22, 2024 3:31 PM

To: Maiorano, John (MECP) <John.Maiorano@ontario.ca>; Baker, Stacey (MECP) <Stacey.Baker@ontario.ca>; Shulyarenko, Alexander (MECP) <Alexander.Shulyarenko@ontario.ca>

Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>

Subject: FW: Draft EA Submission: Teston Road

Importance: High

Hello.

In the absence of Patrick Fancott, Ted Belayneh and Kristen Sones, please see my email below. A have now sent a support request through ECHO for the region and district office.

Thanks,

Cindy

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>

Sent: Thursday, August 22, 2024 2:08 PM

To: Brown, Andrea (MECP) <Andrea.J.Brown@ontario.ca>; Martella, Anthony (MECP) <Anthony.Martella@ontario.ca>; Fancott, Patrick (MECP) <Patrick.Fancott@ontario.ca>; Kourktchan, Sabina (She/Her) (MECP) <Sabina.Kourktchan@ontario.ca>; Ajderian, Karin (MECP) <Karin.Ajderian@ontario.ca>; Source Protection Screening (MECP) <SourceProtectionScreening@ontario.ca>; Species at Risk (MECP) <SAROntario@ontario.ca>; Dugas, Celeste (MECP) <Celeste.Dugas@ontario.ca>; Belayneh, Ted (MECP) <Ted.Belayneh@ontario.ca>; Sones, Kristen (She/Her) (MECP) <Kristen.Sones@ontario.ca>

Cc: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Desautels, Solange (MECP) <Solange.Desautels@ontario.ca>

Subject: Draft EA Submission: Teston Road

Importance: High

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- Appendix E – Natural Environmental Report
- Appendix F – Arborist Report
- Appendix G – Noise Study
- Appendix H – Air Quality Study

- Appendix K – Drainage and SWM Report
- Appendix L – Hydrogeology Report
- Appendix M – Contamination Overview Report
- Appendix O – Soil Investigation Report
- Appendix P – Fluvial Geomorphology Report
- Appendix Q – Climate Change

I will be sending a separate request for Central Region Staff through ECHO.

The Environmental Assessment Branch is requesting staff comments by September 20th, 2024.

Please reach out if you have any questions.

Thank you.

Cindy Batista | Special Project Officer | Transit Coordinator (she/her)
Environmental Assessment Services | Environmental Assessment Branch
Ministry of the Environment, Conservation & Parks
135 St. Clair Avenue West, 1st Floor, Toronto, ON M4V 1P5
Phone: 437-248-0058 | Email: cindy.batista@ontario.ca

If you have any accommodation needs or require communication supports or alternate formats, please let me know.

Si vous avez des besoins en matière d'adaptation, ou si vous nécessitez des aides à la communication ou des médias substitués, veuillez me le faire savoir.

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement,
de la Protection de la nature
et des Parcs**

Environmental Permissions
Branch

Direction des permissions
environnementales

1st Floor
135 St. Clair Avenue W
Toronto ON M4V 1P5
Tel.: 416 314-8001
Fax.: 416 314-8452

Rez-de-chaussée
135, avenue St. Clair Ouest
Toronto ON M4V 1P5
Tél. : 416 314-8001
Télééc. : 416 314-8452

September 23, 2024

To: Cindy Batista
Special Project Officer
Environmental Assessment Branch

From: Anthony Martella, P.Eng.
Senior Noise Engineer
Environmental Permissions Branch

Re: **Noise Review Comments**
Teston Road from Highway 400 to Bathurst Street
Regional Municipality of York, ON
Noise EA File #E0011

This office was requested to review the noise and vibration aspects of the following documents:

- i. "DRAFT REPORT Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street," prepared by Morrison Hershfield now Stantec for York Region, dated August 15, 2024.
- ii. "Environmental Noise Assessment Teston Road from Hwy. 400 to Bathurst Street," prepared by SLR Consulting (Canada) Ltd., dated May 18, 2023 (Appendix G of the report listed in bullet point "i" above).

Please note that Document "i" above is referred to herein as the "IEA Report" and Document "ii" is referred to herein as "Appendix G." The following comments are provided based on the noise review of the above noted documents:

Appendix G

1. General: The overall project considers Teston Road from Highway 400 to Bathurst Street; however, it is understood that the scope of this noise study is Teston Road from Keele Street to Bathurst Street.
2. Section 2.2.2: Please explain in more detail how the NSAs were determined and how representative receptors were located. How far away from the road should NSAs extend and was this determined by contouring of sound levels? Also, how similar are the overall noise levels and changes in sound levels among noise sensitive areas / lots represented by a single receptor?
3. Section 2.6: Please provide justification as to why an implementation of traffic noise modelling in Cadna/A is used rather than the STAMSON software or the latest working version of TNM that is approved by the FHWA. Please provide representative calculations using either STAMSON or the latest working version of TNM approved by FHWA to show reasonable consistency of results.
4. Section 2.7, Table 5 and Section 2.8:
 - a. Receptors 7 to 9, 18 and 19 are given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation should be deferred until levels are above 60 dBA. Please clarify.
 - b. Receptor 4 is given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation is not possible due to a driveway, which is the subject of Note [2] in Table 5. Please clarify.
 - c. Please note that the terms “Receptor” and “Receiver” are both used in Table 5. The discussion in this review assumes they are interchangeable.
 - d. Please provide sample calculations for representative receptor results.
5. Section 4.0: In the area west of Keele Street, the receptors on the south side were the focus of the study. Please discuss the potential for receptors to the north of Teston Road. There are future developments shown in Appendix B as well as in the IEA Report, page 218.
6. Figure 1 and Figure 2: The study area boundary for this noise study shown in Figure 1 appears to extend farther west than the westernmost receptors considered and shown in Figure 2. Please clarify.
7. Figure 3:
 - a. It appears that Dufferin Street has been mislabelled.
 - b. Should houses to the west of Receptors 21 to 25 be considered (on the west side of Germana Pl.)?
 - c. Please comment on why a barrier cannot be placed to the west of the driveway for Receptor 6. Would there be any new road running north from Teston Road to the future subdivision along the west side of this receptor?
 - d. There is an existing house to the west of the future receptors.

8. Figure 4: There is a house to the west of Receptor 27 which is shown to not have a barrier. Please clarify.
9. Appendix B: Some grades are significant enough to possibly affect the noise modelling. Please comment.
10. Appendix D: How were the sound power levels (PWL') derived?
11. The completion of the MECP's noise and vibration review of this project is not an MECP's endorsement of criteria/limits set by other agencies, such as City of Vaughan, York Region, MTO, etc.

IEA Report

1. The comments referenced to Appendix G above also apply to the IEA Report.

I trust the above noise review would be of assistance to you.

If you have any questions, please contact Anthony Martella, P.Eng. at 437-881-5466.



Anthony Martella, P.Eng.
Senior Noise Engineer

**Ministry of the Environment,
Conservation and Parks**

**Ministère de l'Environnement,
de la Protection de la nature
et des Parcs**

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October 31, 2024

MEMORANDUM

TO: Nick Crawford
Environmental Planner
Stantec (formerly Morrison Hershfield)
nick.crockford@stantec.com

FROM: Cindy Batista, Special Project Officer
Environmental Assessment Service Section

RE: Draft Environmental Assessment of the Teston Road Area Transportation
Improvements

Thank you for the opportunity to review the draft Environmental Assessment (draft EA) for York Region's proposed Teston Road Area Transportation Improvements (project). The Ministry of the Environment, Conservation and Parks (the ministry) Environmental Assessment Services Section has conducted a review of the draft EA taking into consideration the applicable requirements of the amended [Environmental Assessment Act](#) (EAA or the Act), the [Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario](#) (EA Codes of Practice), [Code of Practice for Consultation in Ontario Environmental Assessment Process](#) and the approved Terms of Reference (ToR) for the project. In its review, the ministry has identified specific comments on the draft EA that are detailed below.

Environmental Assessment Modernization

As you are aware, the ministry is modernizing its almost 50-year-old EA program to better serve communities now and in the future. Regulatory changes this year include the move to a project list approach under the EAA that included proclaimed relevant provisions to the Act, making several new regulations and making changes to existing regulations.

This includes a new designation and exemption regulation under the EAA, titled Part II.3 Projects – Designations and Exemptions. This regulation is referred to by the ministry as the Comprehensive Environmental Assessment Projects Regulation and it lists all the projects that are designated under the EAA, as well as exempted projects for transit, waste, and electricity, which are subject to a streamlined process.

With these changes, the EAA will generally apply to projects designated in the Comprehensive EA Projects Regulation and other regulations under the EAA and projects to which an approved Class EA applies.

There is no impact to projects that previously followed an EA under the EAA and were approved. Also, all projects which have started an EA application (i.e., approved ToR) will continue in the EA process. Please visit the ministry website [here](#) to hear more about all the EA modernization initiatives.

Expiry of Approval

In 2020, EAA amendments also provided for expiry date provisions for EA approvals with an objective to account for potential changes in the environment or regulatory standards.

All EA approvals including historical approvals for projects that have not been implemented yet now have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. The expiry provisions came into effect in February 2024. Please see section 17.25 of the EAA for additional information.

General Comments

1. The project title and throughout the draft EA report there are references to the term 'individual environmental assessment'. There is also reference to the term 'undertaking' throughout the draft EA report.

In February 2024, Part II of the EAA was repealed and Part II.3 was proclaimed into force. Several regulations, including [O. Reg. 53/24 \(General and Transitional Matters\)](#), were also made under the EAA. In accordance with the transition provisions set out in O. Reg. 53/24, your undertaking, as described in your ToR, is now deemed to be a Part II.3 project and the application will be deemed to have been submitted under subsection 17.2(1). Following the move to Part II.3, the term

“individual” with respect to environmental assessments was replaced with “comprehensive” and the term “undertaking” with “project” or “Part II.3 project”. References to the EAA should also be updated as appropriate with the repeal of Part II of the EAA.

It is recommended that any references to ‘individual’, including the project title, be either removed and/or replaced with ‘comprehensive’. Include an explanation in the Executive Summary and in the main body of the EA report why this change was necessary. The ministry is also recommending that any references to the word ‘undertaking’ be replaced with ‘project’.

Title Page and Executive Summary

2. In the ‘Environmental Effects and Mitigation’ section there is reference to the Ministry of Natural Resources and Forestry (MNR) Aurora District...”. Please note this ministry is now called the Ministry of Natural Resources. Please update the draft EA to reflect the new ministry name throughout the document.
3. Will the cost estimates for the proposed project be added in the final EA in the section entitled ‘Preliminary Cost Estimate’ as well as in section 9.10 (page 287)?
4. It is recommended that the sections of the main report that are referenced in the Executive Summary include specific section numbers, so that readers know where to go for more detailed information for that specific item.

Main Report

5. In the Introduction section (page 1), there is reference to the Teston Road Area Transportation Improvements IEA study area. However, in the Executive Summary, there is reference to ‘Teston Road study area’ under the sub-section called ‘Archaeology, which is the same as Figure 1-1.

The ministry understands that specific technical studies may have differing study area boundaries based on the type of impact being assessed. However, when referring to the main project study area, it is recommended that reference to the project study area be consistent throughout the document, by defining it first and referring to it in the same manner throughout the EA report.

6. In section 1.2: Purpose of the Project (page 2) is stating the following:

The purpose of this IEA is to generate a transportation solution that addresses a variety of transportation problems and opportunities in the study area. The project considered improvements for the movement of vehicles, pedestrians, cyclists, and transit.

As per section 4.2.1 of the EA Codes of Practice, the proponent, at the EA stage, must revisit the problem or opportunity that prompted the EA process. A preliminary description of the purpose statement that was used in the approved ToR is appropriate. However, for the EA report, a detailed definition of the purpose of the project should be described in this section. Please revise this section of the EA report to provide a detailed definition of the purpose of the project.

7. Given recent changes to the EAA, statements such as ‘Given the scope, complexity, and scale of this Project, an IEA is required to meet the requirements of Ontario’s EAA’ is no longer an accurate statement. Suggest changing it to indicate that ‘as per the approved ToR, the proponent felt that given the scope, complexity and scale of the project, an EA should be prepared’.
8. It may be helpful to include in the draft EA report, how the EAA currently applies to this project. As described above, the project is subject to transition provisions under the EAA, which identify that a project with an approved ToR is deemed to be Part 11.3 project. The project, as defined in the ToR, is subject to the EAA.
9. In section 2.2 (page 5) it states that although the EA process is now referred to as Comprehensive Environmental Assessments, for the purposes of continuity, this EA report will continue to refer to Individual Environmental Assessment or IEA. The EA report should be updated to align with the changes made to the Act in February 2024, as per the above. The ministry is no longer using the term ‘individual EA’. By referring to this change at the start of the EA report will provide that clarity to readers.
10. Section 3.2.4 (page 25), states that the 4th Public Open House was held virtually in December 2023 due to the COVID-pandemic restrictions. Why did York Region continue to hold virtual open houses at a time when there were no longer COVID restrictions?
11. This same page states that the ‘third Public Open House was held to provide the public with an opportunity to review and comment. . .’. This is a typo. Is it supposed to say the fourth Public Open House? Please confirm and make correction.
12. On page 27, the EA report refers to ‘Teston Road EA’. Is this term referring to the proposed project or the EA report. It is recommended that reference to common terms be consistent throughout the EA report by defining it at the beginning of the report and then using the same term throughout.
13. An update to the Indigenous Peoples Consultation section commencing on page 35 is recommended to reflect the ministry letter dated October 4, 2024, re-confirming the community list for the proposed project.
14. Section 4.3.6.1 (page 49) refers to consideration of traffic analysis with or without the proposed GTA West (Highway 413). Please note that Ministry of Transportation has

moved away from using the term 'GTA West'. Please update the EA report to replace GTA West with Highway 413.

15. Section 8.8. 1 (page 217) refers to both ultimate design and interim design. It is not clear in reading this paragraph if the interim design is what will move forward as the preferred design that is part of this comprehensive EA and ultimate design is part of future works that is outside this EA process. Please clarify and revise text as necessary. Same comment applies to section 8.8.2 that refers to 'interim condition'. Does 'interim condition' mean the same as interim design' and is the design that is proposed for this comprehensive EA? Please clarify and revise EA report accordingly. Please also clarify what it means to say 'interim active transportation facilities' in section 8.8.3 and revise report accordingly.
16. Section 9.9 (pages 243-44) provides a high-level summary of the anticipated property requirements that will be required for the proposed project. Stating how many properties are anticipated to be impacted because of the proposed project before arriving at Table 9-2, is recommended.
17. As per section 9. 10 (page 245) construction of a four-lane Teston Road from Keele Street to Dufferin Street is identified in the Region's 10-year capital plan and the widening of Teston Road to four lanes from Dufferin Street to Bathurst Street is currently beyond the horizon of the Region's 10-year capital plan. Furthermore, it is understood that the proposed project is subject to funding availability, as per section 9.12 (page 245). As per page 2 of this memo, all future EA approvals will have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. Ministry staff wanted to highlight this change in the EAA so that York Region is aware of this as it moves through the EA process for its proposed project.
18. Should new information regarding funding availability be confirmed prior to formal submission of EA, please update the EA report accordingly.
19. Given the uncertainty in the timing of when the project might be able to start construction, there may be changes to the project in the future that are inconsistent with the results and conclusions of the EA, because of changes to the environmental landscape and/or changes to legislation and regulations. The EA report should include an amending procedure that may allow York Region to make modifications to the approved project without having to fulfill the requirements of the EAA all over again. The amending procedures, at minimum, should describe a detailed process as to how York Region will assess any new potential environmental effects of the change, identify any additional mitigation measures that may be required, how it will be documented, including consultation. This assumes an EA Notice of Approval is issued for the proposed project. Please visit section 4.2.5 of the EA Codes of Practice for additional information.

Please provide a draft of the proposed amending procedures to this branch for our review.

Next Steps

The ministry has provided memos and comment tables from the ministry's technical reviewers on September 23rd and October 8, 2024, via email, from the following program and office areas:

- Central Region (groundwater, surface water and air)
- York Durham District Office
- Noise
- Species At Risk

The ministry expects that the proponent will provide responses to all ministry comments before the formal submission of the EA and seek the ministry's acceptance of the proposed method of addressing the comments. To facilitate the ministry's review and to support effective issue resolution, please submit responses to all ministry comments in table format, organized by reviewers.

The ministry is available to meet with you to discuss any questions you may have and to support you in resolving any issues before the submission of the final EA. This approach is also recommended to address any outstanding comments from other government agencies in accordance with the ministry's EA Codes of Practice.

The ministry requires copies of government agencies' comments (i.e., Ministry of Natural Resources and Toronto and Region Conservation Authority) on the draft EA, if any. The records should demonstrate what their comments are, how they are addressed, and confirmation that they have no additional comments on the EA.

In advance of submitting the final EA, you may wish to consult interested persons about the revisions, as well as meetings with Indigenous communities, and other interested parties. The final EA should include documentation of those activities as well as any changes that were made to the documentation to address comments.

Should you have any questions or require further information, please contact the undersigned at 437-248-0058 or by email at cindy.batista@ontario.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Cindy Batista", is written over a horizontal line.

Cindy Batista

c: Solange Desautels

Ministry of the Environment

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October 7, 2024

**TO: Cindy Batista, Special Project Officer, Transit Coordinator
Environmental Assessment Services, Environmental Assessment
Branch**

**FROM: Mihran Aslanyan, Hydrogeologist
Alexander Shulyarenko, Surface Water Specialist
Rui Zeng, Air Quality Analyst**

**Subject: Central Region Technical Support Comments
Teston Road Area Transportation Improvements, Individual
Environmental Assessment, West of Keele Street to Bathurst Street,
Vaughan, York Region
ECHO no. 1-614600291**

Central Region Technical Support Section (TSS) of the Ministry of the Environment, Conservation and Parks (MECP) reviewed the “*Draft Report, Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street*” (the *Draft Report*) and its technical appendices for the Teston Road individual EA Study. The Draft Report was prepared by Morrison Hershfield Limited and dated August 15, 2024. Please find below the ministry’s comments for the proponent’s consideration.

• **Groundwater comments**

The following comments are with respect to groundwater-related items based on a review of the following documents: “*Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street*” (*Draft Report*); prepared by Morrison Hershfield Limited for the Regional Municipality of York, dated August 15, 2024.

The following reports were included as Appendices:

- *Appendix K – Drainage and SWM Report*
- *Appendix L – Hydrogeology Report*
- *Appendix M – Contamination Overview Report*
- *Appendix O – Soil Investigation Report*

The proposed project involves improvements to Teston Road between Keele Street and Bathurst Street. The proposed improvements include realignment of Teston Road

between Keele Street, constructing a new road segment of Teston Road from 500m east of Keele Street to Dufferin Street, and widening and rehabilitation of Teston Road between Dufferin Street and Bathurst Street.

The proposed new road segment travels between three landfills - the Vaughan Landfill, the Keele Valley Landfill, and the Disposal Services Landfill. A number of groundwater-related issues are discussed in the above referenced Draft Report at a level appropriate for this stage of the project. The report provides a summary of potential groundwater related impacts of the proposed project. At the current design stage some landfill infrastructure is in conflict with the proposed road design. The report outlines mitigation measures and future commitments with respect to the identified issues and recognizes the need to further assess groundwater conditions during the detailed design stage. It is recognised in the report that changes to the landfill infrastructure may require amendments to the landfill ECAs under which the affected landfills operate.

Most of the proposed construction work is above the water table, and dewatering will be limited to certain areas near the water crossings and related to the deepest parts of the storm water system (including storm water storage facilities).

The field methodology and data analysis described in the report are considered acceptable at this planning stage. The recommendations provided within the report are considered as applicable and should be implemented during detailed stages of the project design.

Recommendations

- Detailed design stage of the project will need to further evaluate and minimize conflicts with landfill infrastructure and landfill monitoring systems and propose acceptable mitigation measures. Design for depth of construction excavations in support of underground infrastructure should carefully consider nearby landfill waste areas, infrastructure, and monitoring systems.
- Further investigation of presence of landfill waste and landfill gas along the road alignment is required in close consultation with the landfill owners (City of Toronto, City of Vaughan, and private owner for Disposal Services Landfill) and MECP District Office. The landfill historical mapping, waste location records, landfill monitoring data (landfill gas and groundwater) needs to be reviewed and considered during detailed design stage.
- The presence of landfill waste within the road ROW should be further investigated during the future geotechnical investigation.
- Contingency plans are recommended in the event of encountering landfill waste, landfill related infrastructure, impacted soils and gases during construction, especially near the Vaughan and Disposal Services landfills, where waste location details are not well known. A mitigation plan should also be developed, including notification of the landfill operator and control measures to minimize the exposure of construction workers.
- The presence of methane beneath the proposed roadway must be considered during design, and infrastructure for during- and post-construction mitigation of potential

landfill gas exposure should be developed as part of the road design to insure safe conditions for the road users.

- The detailed road design needs to consider that, gas collection systems at the landfills are active and functioning, however the contingency measures should be incorporated in the design to account for the events of potential failure of the landfill gas collection systems and effects on road users.
- As noted by WSP (2024), groundwater dewatering associated with the proposed bridge construction across the valley east of Vaughan Landfill may influence the groundwater flow temporarily or permanently and could affect the movement of the chloride plume. Enhanced monitoring of the chloride plume in this area is recommended during and following construction.
- Location and design (depth) of stormwater management facilities and infrastructure will need to consider potential long-term effects on groundwater conditions and landfill related infrastructure, to minimize any potential impacts to existing plumes and monitoring activities at the landfills.
- Further assessment of potential impacts on groundwater levels near proposed deep excavation sections requiring dewatering will be required. Construction dewatering related permitting requirements should be followed as applicable (PTTW, EASR).
- As acknowledged by WSP (2024), a Phase Two ESA will be required across properties with PCAs before a Record of Site Condition (RSC) can be submitted for the Site. A Phase Two ESA is therefore recommended for Properties 1 & 2, 4, 5 and 8 which includes seven APEC.
- 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. Appropriate stormwater design measures for isolation of impacts resulting from road salt application should be implemented.
- Geotechnical investigation for the project needs to evaluate in detail the potential for during- and post-construction ground settlement as it relates to landfill waste areas, landfill cover and local groundwater conditions.
- Detailed geotechnical investigation should also include assessment of potential impacts of ground disturbance effects related to road construction on Keel Valley landfill leachate collection main that extends underneath the proposed road, as well as, on Teston Road Purge Well System and Vaughan/ Keel landfill gas extraction and monitoring wells. The results of completed assessment should propose construction methods that will minimize the potential impacts and provide mitigative measures to be implemented during road construction.
- Final project design report will need to include detailed short- and long-term monitoring and mitigation plan related to landfill effects, groundwater resources impacts, landfill gas and ground settlement.

• **Surface Water Comments**

The following comments are with respect to surface water related items with a focus on stormwater management. The following two documents were the focus of the review:

- *Morrison Hershfield (2024). "Draft Report. Individual Environmental Assessment for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street". Dated: August 15, 2024.*
- *Morrison Hershfield (2024). "Teston Road Area Transportation Improvements Individual Environmental Assessment. Drainage and Stormwater Management Report". Dated: July 5, 2024. This report is included in the main report as Appendix M.*

Morrison Hershfield Limited has completed an Individual Environmental Assessment study for transportation improvements in the Teston Road (Regional Road 49) area for the Regional Municipality of York. The study area extends from Highway 400 to Bathurst Street and from Kirby Road to Major MacKenzie Drive within the City of Vaughan. Future extension of Teston Road between Keele and Dufferin Streets is located between the Keele Valley Landfill to the south and the Vaughan Township Landfill to the north. There is also the Disposal Services Landfill to the north.

Teston Road is a two-lane road mostly located within the Don River watershed. The total length of the road within the study/reconstruction area is approximately 6.8 km. There are seven watercourses crossing the study area including the East Don River Branch and McNair Creek.

The IEA report recommends a Wetland and Significant Wildlife Habitat Restoration Plan development to characterize wetland areas, identify opportunities to minimize impacts and to develop appropriate mitigation and restoration measures.

A Stormwater Management Plan was developed and meets drainage design criteria as set by the Region of York, TRCA, MECP and MTO. Stormwater quality, quantity and erosion controls are proposed with the intention to control post-development flows for the 2-year to 100-year storm events to pre-development level, to remove 80% TSS in treated stormwater and to ensure a minimum 5 mm of storm runoff retention.

The following stormwater management practices have been reviewed for appropriateness:

- Storage SWMPs such as wet ponds, dry ponds, constructed wetlands and underground storage tanks/pipes;
- Infiltration SWMPs such as infiltration basins, infiltration trenches and porous pavement;
- Vegetative SWMPs such as buffer strips, grassed swales, rain garden/bioretention and strips; and
- Special purpose SWMPs such as oil/grit separators and filter devices.

Based on an initial screening of SWMPs, it was concluded that:

- The use of surface storage SWMPs (such as wet ponds, dry ponds, and constructed wetlands) for the linear infrastructure project within urban setting is limited due to space constraints. In such cases, underground storage tanks and pipes become the main measures for water quantity control.
- SWMPs based on infiltration can be effective in treating stormwater runoff and recharging groundwater, but their effectiveness is limited with respect to flood control. It should also be noted that infiltration facilities cannot be applied to landfill areas due to the potential impact on groundwater patterns and concerns regarding re-contamination.
- Vegetative SWMPs such as grassed swales, bioretention cells, filter strips, provide water quality treatment primarily by filtering out fine sediments and promoting infiltration. Due to the urban corridor, vegetative buffers, filter strips and enhance swale along the corridor are not practical. An alternative solution could be incorporating enhanced swale at the storm sewer outlet. In addition, bioretention cells can be integrated into boulevards where the space is available.
- Oil/grit separators are practical measures that can be incorporated into a storm sewer system. They can be used in conjunction with other SWMPs as part of a treatment train.

Overall, the proposed stormwater management plan for the ROW improvements will include the use of underground facilities for quantity control and water balance (via infiltration) and OGS units placed upstream of outlets for quality control. A surface SWM facility (SWMF1) is proposed at Outlets 2 and 3 for water quality and quantity control.

Comments:

In general, I concur with the recommendations provided in both reports. I offer the following comments for consideration:

- 1) The IEA report asserts (p.241) that “due to the urban corridor, vegetative buffers, filter strips and enhanced swale along the corridor are not practical.” I do not agree with this statement. These LID methods have been developed in order to accommodate cases like this one and could be applied in areas not in close vicinity to the landfills. The cumulative impact of stormwater resulting from the road widening should be considered with higher emphasis placed on the protection of the environmental receivers.
- 2) It is indicated in the SWM report (p.26) that “documentation is not available to verify whether the existing SWM facilities (within the subdivisions) have sufficient capacity to service the future Teston Road widening”. Given that the existing stormwater management facilities have been built recently, documentation for them should be available. I recommend the proponents and their consultants do more to locate the

needed documents and incorporate them in their evaluation of SWM for the project.

- 3) The MECP's 'Enhanced Water Quality Protection' Level 1 should be applied to all stormwater management facilities. When a stand-alone SWM control cannot achieve Level 1 protection, a treatment train approach that includes vegetative buffers, bioswales, OGSs and/or infiltration trenches should be considered in suitable areas.

If you have any questions regarding the above comments, please contact me by phone at (437) 788-2746 or by e-mail at Alexander.Shulyarenko@ontario.ca.

• **Air Quality Comments**

The following comments are with respect to air quality related items. The following two documents were the focus of the review:

- *Appendix H - Air Quality Assessment Report (the AQA report), prepared by SLR and dated May 18, 2023.*
- *Sections 5.4.6 and 10.4.3 of the Draft Individual Environmental Assessment (EA) for the Teston Road Area, Transportation Improvements, Highway 400 & Bathurst Street, prepared by Morrison Hershfield Limited and dated August 15, 2024.*

This study proposes to widen Teston Road to four lanes, as well as extend the roadway between Keele Street and Dufferin Street in Vaughan. Please find below the ministry's comments for the proponent's consideration.

- According to *Appendix M Contamination Overview Study Report* prepared by Morrison Hershfield and dated October 27, 2022, the location of the proposed Teston Road extension is situated between three landfills where soil contamination may have occurred. Additionally, the Phase 1 Environmental Site Assessments (ESAs) identified several areas of potential environmental concern (APEC) in the study area that have the potential to emit contaminants of concern as a part of fugitive dust. Therefore, when soil excavation activities occur during the construction phase, the ministry recommends:
 1. when soil excavation activities occur during the construction phase, onsite ambient air monitoring takes place at the sensitive receptors identified in the AQA report for the site-specific contaminants identified within the APEC.
 2. the proponent should consider notifying the ministry's York Durham District Office of any ambient air quality criteria exceedances of the contaminants of concern during the construction phase of this project.
 3. where possible, reduce soil excavation activities and ensure that adequate dust mitigation measures are in place during forecasted windy conditions.
- During the operation phase, the ministry concurs with the proposed mitigation

measures of planting coniferous trees and shrubs, as noted in Section 5.0 of the AQA report. Further to this, the ministry suggests that the proponent consider vegetating near the identified worst-case sensitive receptors (Receptors 12, 14, 16, and 17) to further minimize off-site particulate impacts.

- The ministry recommends that a complaint response protocol be prepared that outlines the measures that will be implemented when dust and/or odour complaints are received during the construction phase of the project and should include local district office notification.

If you have any questions regarding the above air quality comments, please feel free to contact me at rui.zeng@ontario.ca.

This concludes the CR TSS groundwater, surface water, and air quality comments on the proposed Teston Road Area Transportation Improvement Individual EA.

Cc:

Paul Martin, Technical Support Manager (A), MECP
Ted Belayneh, Technical Support Water Resources Supervisor, MECP
Kristen Sones, Technical Support APEP Supervisor (A), MECP

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Memorandum

Date: September 26, 2024

To: Cindy Batista, Special Project Officer, Transit Coordinator
Environmental Assessment Services, Environmental Assessment Branch

From: Andrea Brown, District Engineer, York Durham District Office

Re: District Review of Draft Environmental Assessment Report
Proposed Teston Road, City of Vaughan
Regional Municipality of York

I have completed a review of the following report and appendices for the proposed Teston Road extension between Keele and Bathurst Street, Vaughan:

“Individual EA for the Teston Road Area, Transportation Improvements, Highway 400 and Bathurst Street”, prepared by Stantec, August 15, 2024

District comments are listed below:

1. Noting that Vaughan’s planning for the North Maple Regional Park has been ongoing for a number of years, and itself includes a number of agencies, permitting and other processes, a reference for the timing and park scope described in section 5.4.3.1 would be appreciated. It may be conservative to consider potential future parkland use and receptors in proximity to the roadway, but does not remove landfill considerations.
2. Section 5.4.3.1 and Appendix M (Contamination Overview Study) discuss ‘Potentially Contaminating Activities’ (PCA) and ‘Areas of Potential Environmental Concern’ (APEC) – both of which are defined terms in O.Reg 153/04 ‘Records of Site Condition’. The EA and appendix are not consistent with the use of these terms under O.Reg 153 or O.Reg 406, and have grouped many separate properties and activities into generalized PCA/APEC which significantly underrepresents the potential for impacts across the study area. Where a PCA like waste management is identified, this cannot be treated as a single APEC spanning

waste management activities across nearly a dozen properties. Similarly, fuel storage PCA's would be specific to individual tanks and activities at each individual garage, gas station and other industrial activities and cannot be treated as a single APEC. This also applies to other broadly grouped PCA/APEC including chemical storage and manufacturing activities. As the assessment of potential contamination is intended to inform potential property acquisitions, construction considerations and soil use or reuse, refinement is required to ensure individual PCA are adequately evaluated and property specific APEC assessed.

3. The approach to the Keele Valley Landfill Site (KVLS) does not appear to recognize the site as defined by the Environmental Compliance Approval (ECA). Several figures focus exclusively on the waste footprint and do not acknowledge the entire approved site including the primary and secondary buffer lands, also subject to the ECA and where landfill infrastructure, mitigation and contingency infrastructure is either currently operating or may be constructed in the future.
4. The reference to relevant legislation/instruments for the KVLS does not include the many notices of amendment, or separate storm water and air ECAs associated with the site. While the ministry is currently reviewing a request to consolidate the ECAs, the entirety of the approval should be considered, especially the December 20, 2006 Notice of Amendment #35 which incorporates the Closure Plan and long-term site maintenance, monitoring and management requirements. (section 11, Appendix references)
5. Section 5.6.12 indicates future discussions with Toronto will be used to determine landfill limits, ECA applicability. The MECP's approvals are not subject to Toronto's interpretation of what is already defined in these permissions and future discussions should focus on assessing current and future landfill operations, monitoring and contingencies managed by Toronto within and adjacent to the proposed roadway.
6. The reference to D series guidelines is not directly applicable to KVLS, but should be considered by the Region where they are proposing work in proximity to three closed landfills.
7. The reference to two chloride plumes appears to be an outdated reference to possibly a Vaughan Landfill Site (VLFS) reference. KVLS monitoring includes nine distinct plumes that have been historically identified, including those originating upgradient of the site non-landfill derived plumes at the site. Notably references in Appendix L for KVLS do not include the 2006 Closure Plan or any monitoring reports within the last 20 years. If this reference is intended to reflect only the KVLS purge well system and monitoring along the Teston right of way, that should be clarified and again supported with a reference.

8. The discussion of the Disposal Services or Testonview Holdings landfill does not acknowledge the infrastructure associated with that landfill, notably relating to leachate and landfill gas. Again, there may be recent monitoring reports available to describe these operations and area conditions.
9. The Testonview Holdings landfill is the subject of a Provincial Officer's Order, which pre-dates subsequent landfill ECA amendment and more recent monitoring and reporting. There has been no 'provincial offense' relating to this property(as described in Appendix L).
10. The IEA has divided the project into sections, and it should be clarified that while this may facilitate report organization, some road segment issues apply beyond the definition of that segment, i.e. landfill issues are present with the Testonview Holdings landfill in the Keele-Rodinea section and extend into the Valley crossing section to the east.
11. While section 10.6.1.5 of the IEA indicates stormwater management infrastructure should consider landfill gas migration, this is not reflected in Appendix K. Broadly, all subsurface utilities have the potential to act as preferential pathways for landfill gas (or potentially other contaminant vapours), and the KVLS ECA describes the requirements for collars and trench-plugs for utilities which may appropriate for future infrastructure in this area.
12. Under future commitments, ECA amendments are identifies as a task for landfill owners. As has been raised at previous meetings, ownership of portions of landfill properties and responsibility for changes to any of the landfill operations should be discussed with the site owners as creation of the roadway is not currently related to any of the 3 landfill operations or long-term requirements.
13. Appendix L – Hydrogeology has compared results of groundwater monitoring to Provincial Water Quality Objectives and York sewer-use criteria. While this may be relevant to dewatering and potential discharges, it should be clarified if groundwater quality evaluation will also serve other objectives. Notably, the IEA indicates Records of Site Condition may be required, and O.Reg 153 criteria, or potentially component values may be appropriate to apply to site contamination and where sensitive receptors are present.
14. Appendix L – sampling has focused on general chemistry, nutrients and metals and should be expanded to consider the potential contaminants of concern that relate to site specific PCA/APEC (i.e. landfill indicator parameters, fuels, or chemicals relating to specific industrial operations etc.). Again, the relevance of groundwater characterization to acquisitions, RSCs or in relation to specific receptors (i.e. subsurface workers, discharge to surface water etc.) may consider additional parameters.

15. Appendix O – Soil Investigation Report. This appendix and elsewhere in the IEA has selected site condition standards without clearly providing a rationale for the choice. The use of Table 1 in the vicinity of the KVLS may relate to Toronto's historic approach to site cover quality, which considered the site's proximity to environmentally sensitive features, and this would also be appropriate to consider in landfill to Dufferin road segment crossing the Don.
16. Appendix O – the Region is reminded that the application of non-potable standards under both O.Reg 153 and O.Reg 406 requires notification to the Region under S.35 of O.Reg 153. This process does consider other groundwater use in the vicinity of the request and is described in the Region's policy <https://www.york.ca/business/land-development/non-potable-requests-brownfield-development>
17. Generally, very limited information has been reviewed in relation to the extensive landfill infrastructure present in the vicinity of the proposed alignment and while future studies are proposed to develop more detailed designs, this work must engage the landfill owners and ensure that the integrity of landfill operations, in addition to road and multi-use-path users, and future road workers is protected. Leachate and landfill gas infrastructure has been oversimplified in the IEA, and landfill liner and capping are also vital engineered components to the 3 landfills. More recent monitoring reports and approvals should be considered in evaluating the feasibility of specific infrastructure and operational changes.

If you have any questions or require further information or clarification, please don't hesitate to contact me at Andrea.J.Brown@ontario.ca or at (905) 426-0079.

Andrea Brown, P.Eng
York Durham District Engineer

Cc: Steve Batten, Senior Environmental Officer, York Durham District Office
Celeste Dugas, District Manager, York Durham District Office

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary			
	IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 5, 2025)
MECP – Environmental Permissions Branch – Noise and Air Quality (September 23, 2024)			
1.	Appendix G – Environmental Noise Report	Section 2.2.2	Explain in more detail how the NSAs were determined and how representative receptors were located. How far away from the road should NSAs extend and was this determined by contouring of sound levels? Also, how similar are the overall noise levels and changes in sound levels among noise sensitive areas / lots represented by a single receptor?
2.		Section 2.6	Please provide justification as to why an implementation of traffic noise modelling in Cadna/A is used rather than the STAMSON software or the latest working version of TNM that is approved by the FHWA. Please provide representative calculations using either STAMSON or the latest working version of TNM approved by FHWA to show reasonable consistency of results
3.		Section 2.7, Table 5 and Section 2.8	Receptors 7 to 9, 18 and 19 are given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation should be deferred until levels are above 60 dBA. Please clarify.
4.			Receptor 4 is given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation is not possible due to a driveway, which is the subject of Note [2] in Table 5. Please clarify.
5.			Please note that the terms “Receptor” and “Receiver” are both used in Table 5. The discussion in this review assumes they are interchangeable.
6.			Please provide sample calculations for representative receptor results.
7.		Section 4	In the area west of Keele Street, the receptors on the south side were the focus of the study. Please discuss the potential for receptors to the north of Teston Road. There are future developments shown in Appendix B as well as in the IEA Report, page 218.
8.		Figure 1 and Figure 2	The study area boundary for this noise study shown in Figure 1 appears to extend farther west than the westernmost receptors considered and shown in Figure 2. Please clarify.
9.		Figure 3	It appears that Dufferin Street has been mislabelled.
10.			Should houses to the west of Receptors 21 to 25 be considered (on the west side of Germana Pl.)?
			<p>Representative receptors were chosen to assess areas with similar overall noise levels and similar changes in noise. In general, receptors were chosen that were the most exposed to noise from the roadway expansion. For the homes, west of Dufferin Street, north of the new structure, homes were also chosen further back from the proposed Teston Road to estimate possible project impacts. Our approach follows the methodology commonly used by the MTO in the Environmental Guide for Noise (2023).</p> <p>The Cadna/A implementation of the STAMSON/ORNAMENT model was used due to its ability to handle complex ground elevations, multiple barriers, and receptors. The Cadna/A software also considers screening from buildings that are located between the roadways and NSAs. SLR staff have used this approach in a number of projects which have been reviewed by MECP and MTO.</p> <p>This approach was first used in 2008 for the Highway 407 East Extension Environmental Assessment project. Other environmental assessment projects where this approach has been used include:</p> <ul style="list-style-type: none"> •Ninth Line EA (Eglinton to Derry) •Yonge Street (Queen St to College/Carlton St) EA •Rossland Road EA •Lakeshore Road BRT •Teston Road (Pine Vally to Kleinburg) •Regional Road 17 Realignment EA <p>At the time of the preparation of this noise report the TNM was not approved for use on municipal environmental assessments. A sample calculation has been provided in Appendix D of the updated report.</p> <p>Acknowledged, changes have been made to the report to reflect the comments provided. Noise mitigation should be deferred to detail design when the “future build” sound levels are below 60 dBA.</p> <p>The York Region policy and the need for noise mitigation is based upon sound levels being in excess of 60 dBA and mitigation can be deferred until sound levels reach that point. By the time this project proceeds to detail design the traffic volumes may have changed. In addition, there should be a revised noise analysis following 90% design and the vertical and horizontal alignment of the roadway could change.</p> <p>A developer-built barrier is already specified for Receptors 7 to 20.</p> <p>At this point in the design, it is expected that noise mitigation is not likely possible due to the need to maintain an entrance to this building. This would be further considered as part of detail design. However, the note has been changed in the updated report.</p> <p>Comment noted. Changes have been made to the report.</p> <p>See response to Comment regarding Section 2.6. A sample calculation has been provided in Appendix D of the updated report.</p> <p>The proposed development in question adjacent to Teston Road appears to be mixed-use in nature with commercial blocks adjacent to Teston and residential further north. The proposed widening of Teston Road will have no effect on the proposed residential development. In addition, the development further north will be more influenced by road traffic on Keele Street. The developer of this property is responsible for accounting for noise from existing Keele Street and Teston Road.</p> <p>That is true. The study area extends beyond the limits of construction to account for possible impacts at receptors at each end of the study.</p> <p>The map is labelled correctly.</p> <p>The most exposed homes for this noise study were chosen (Receptor 21 to 25). The homes west of Receptors 21 to 25 would have considerably lower sound levels due to the shielding caused by rows of homes and the increased distance from Keele Street. Further analysis should be conducted as part of detail design.</p>

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IEA Comment Summary			
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11.		Please comment on why a barrier cannot be placed to the west of the driveway for Receptor 6. Would there be any new road running north from Teston Road to the future subdivision along the west side of this receptor?	Based on an initial review of the sound levels at Receptor 6, a noise barrier is not considered feasible technically and from a cost perspective. Further analysis should be conducted as part of detail design.
12.		There is an existing house to the west of the future receptors.	Based on an initial review of the sound levels the existing residences west of the future receptors, a noise barrier is not considered feasible technically and from a cost perspective. Further analysis will be conducted as part of detail design. It is understood that the residence to the west of the residential development may not be present.
13.	Figure 4	There is a house to the west of Receptor 27 which is shown to not have a barrier. Please clarify	The existing noise barrier was incorrectly implemented into the model. The location has been adjusted to encompass the backyard of the residence to the west of Receptor 27.
14.	Appendix B	Some grades are significant enough to possibly affect the noise modelling. Please comment.	SLR agrees that grade changes can possibly affect the noise modelling. However, grade changes are only necessary to apply in the uphill direction which accounts for 50% of the overall PWL from the roadway. Calculations do not account for drivers reducing the throttle on vehicles as they descend downhill in the other direction. The area in proximity to Fenyrose Avenue has grade changes in both directions of approximately 4.2%. This results in an increase to the PWL of Teston Road of approximately 0.7 dBA in each uphill situation. Overall, this increases the predicted “future build” sound level at the adjacent Receptor 27 by 0.4 dBA from 53.4 to 53.7 dBA and is considered a negligible change to the overall results of this assessment. Therefore, further updates to the PWLs calculated in Appendix B are not required.
15.	Appendix D	How were the sound power levels (PWL’) derived?	<p>The roadway noise prediction model used, colloquially called the “Cadna ORNAMENT Hack” by SLR staff, is based on the ORNAMENT road noise prediction algorithms produced by the MECP. The MECP “STAMSON” highway noise prediction model is a computerized version of this method. Both methods are simplified versions of the United States Federal Highway Administration Method.</p> <p>Noise emission rates (PWL’) and source heights for the roadways as line sources are calculated in a spreadsheet using the ORNAMENT algorithms, based on the traffic mix (number of vehicles, percent medium and trucks), time period, speed, pavement type and roadway gradients.</p> <p>The roadways are modelled as line sources in Cadna/A. Propagation calculations from the source to the receiver and the barrier effects of terrain, buildings, and noise barriers are based on the ISO-9613-2 noise model equations.</p> <p>The Cadna/A model is used because of its ability of handle complex ground elevations, multiple barriers, and receptors. The Cadna/a software also more accurately considers screening from buildings that are located between the roadways and the NSAs.</p>
16.		The completion of the MECP’s noise and vibration review of this project is not an MECP’s endorsement of criteria/limits set by other agencies, such as City of Vaughan, York Region, MTO, etc.	Comment Noted.
MECP – Environmental Assessment Branch (October 31, 2024)			
1.		<p>EA Modernization</p> <p>As you are aware, the ministry is modernizing its almost 50-year-old EA program to better serve communities now and in the future. Regulatory changes this year include the move to a project list approach under the EAA that included proclaimed relevant provisions to the Act, making several new regulations and making changes to existing regulations.</p> <p>This includes a new designation and exemption regulation under the EAA, titled Part II.3 Projects – Designations and Exemptions. This regulation is referred to by the ministry as the Comprehensive Environmental Assessment Projects Regulation and it lists all the projects that are designated under the EAA, as well as exempted projects for transit, waste, and electricity, which are subject to a streamlined process.</p>	Comment Noted. This project (which has an approved Terms of Reference) will continue in the Comprehensive EA process.

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IEA Comment Summary			
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	<p>With these changes, the EAA will generally apply to projects designated in the Comprehensive EA Projects Regulation and other regulations under the EAA and projects to which an approved Class EA applies.</p> <p>There is no impact to projects that previously followed an EA under the EAA and were approved. Also, all projects which have started an EA application (i.e., approved ToR) will continue in the EA process. Please visit the ministry website here to hear more about all the EA modernization initiatives</p>		
2.	<p>Expiry of Approval</p> <p>In 2020, EAA amendments also provided for expiry date provisions for EA approvals with an objective to account for potential changes in the environment or regulatory standards.</p> <p>All EA approvals including historical approvals for projects that have not been implemented yet now have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. The expiry provisions came into effect in February 2024. Please see section 17.25 of the EAA for additional information</p>	Comment Noted. Details regarding the expiry provisions of the EAA have been included in Section 2.2 of the updated EA Report.	
3.	<p>General Comments</p> <p>1. The project title and throughout the draft EA report there are references to the term 'individual environmental assessment'. There is also reference to the term 'undertaking' throughout the draft EA report.</p> <p>In February 2024, Part II of the EAA was repealed and Part II.3 was proclaimed into force. Several regulations, including O. Reg. 53/24 (General and Transitional Matters), were also made under the EAA. In accordance with the transition provisions set out in O. Reg. 53/24, your undertaking, as described in your ToR, is now deemed to be a Part II.3 project and the application will be deemed to have been submitted under subsection 17.2(1). Following the move to Part II.3, the term 2 "individual" with respect to environmental assessments was replaced with "comprehensive" and the term "undertaking" with "project" or "Part II.3 project". References to the EAA should also be updated as appropriate with the repeal of Part II of the EAA.</p> <p>It is recommended that any references to 'individual', including the project title, be either removed and/or replaced with 'comprehensive'. Include an explanation in the Executive Summary and in the main body of the EA report why this change was necessary. The ministry is also recommending that any references to the word 'undertaking' be replaced with 'project'.</p>	<p>Throughout the main EA report we have made the change to Comprehensive EA and added an explanation on this change to both the Executive Summary and the main report (Section 2.2).</p> <p>We have replaced the use of the word "undertaking" with "project" within the report.</p>	
4.	Title Page and Exec Summary	2. In the 'Environmental Effects and Mitigation' section there is reference to the Ministry of Natural Resources and Forestry (MNR) Aurora District...". Please note this ministry is now called the Ministry of Natural Resources. Please update the draft EA to reflect the new ministry name throughout the document.	Use of "Ministry of Natural Resources" has been updated in the EA report.
5.		3. Will the cost estimates for the proposed project be added in the final EA in the section entitled 'Preliminary Cost Estimate' as well as in section 9.10 (page 287)?	Yes, they were added to the draft EA which was published for public review. When this draft was provided to MECF, we were still in the process of confirming the cost estimates.
6.		4. It is recommended that the sections of the main report that are referenced in the Executive Summary include specific section numbers, so that readers know where to go for more detailed information for that specific item.	Specific section references have been added to the Executive Summary.
7.	Main Report	5. In the Introduction section (page 1), there is reference to the Teston Road Area Transportation Improvements IEA study area. However, in the Executive Summary, there is reference to 'Teston Road study area' under the sub-section called 'Archaeology, which is the same as Figure 1-1.	The study area within the noted section is referring to the overall study area, we have made adjustments throughout the report for clarity.

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York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary			
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		The ministry understands that specific technical studies may have differing study area boundaries based on the type of impact being assessed. However, when referring to the main project study area, it is recommended that reference to the project study area be consistent throughout the document, by defining it first and referring to it in the same manner throughout the EA report.	
8.	Section 1.2	<p>6. In section 1.2: Purpose of the Project (page 2) is stating the following:</p> <p><i>The purpose of this IEA is to generate a transportation solution that addresses a variety of transportation problems and opportunities in the study area. The project considered improvements for the movement of vehicles, pedestrians, cyclists, and transit.</i></p> <p>As per section 4.2.1 of the EA Codes of Practice, the proponent, at the EA stage, must revisit the problem or opportunity that prompted the EA process. A preliminary description of the purpose statement that was used in the approved ToR is appropriate. However, for the EA report, a detailed definition of the purpose of the project should be described in this section. Please revise this section of the EA report to provide a detailed definition of the purpose of the project.</p>	Updates have been made to Section 1.2 Purpose of the Project to provide a detailed definition of the purpose of the project including (but not limited to) a revisiting of the problem or opportunity that prompted the EA process.
9.	Section 2	7. Given recent changes to the EAA, statements such as 'Given the scope, complexity, and scale of this Project, an IEA is required to meet the requirements of Ontario's EAA' is no longer an accurate statement. Suggest changing it to indicate that 'as per the approved ToR, the proponent felt that given the scope, complexity and scale of the project, an EA should be prepared'.	Updates have been made to Section 2 as indicated.
10.		8. It may be helpful to include in the draft EA report, how the EAA currently applies to this project. As described above, the project is subject to transition provisions under the EAA, which identify that a project with an approved ToR is deemed to be Part 11.3 project. The project, as defined in the ToR, is subject to the EAA.	This update has been made to Section 2 of the report.
11.	Section 2.2	9. In section 2.2 (page 5) it states that although the EA process is now referred to as Comprehensive Environmental Assessments, for the purposes of continuity, this EA report will continue to refer to Individual Environmental Assessment or IEA. The EA report should be updated to align with the changes made to the Act in February 2024, as per the above. The ministry is no longer using the term 'individual EA'. By referring to this change at the start of the EA report will provide that clarity to readers.	Throughout the main report we have made the change to Comprehensive EA and added an explanation on this change to both the Executive Summary and the main report (Section 2.2).
12.	Section 3.2.4	10. Section 3.2.4 (page 25), states that the 4th Public Open House was held virtually in December 2023 due to the COVID-pandemic restrictions. Why did York Region continue to hold virtual open houses at a time when there were no longer COVID restrictions?	We've removed the reference to COVID restrictions. York Region continues to host online open houses as they often ensure greater engagement and are more accessible for a wider range of participants.
13.	Section 3.2.4	11. This same page states that the 'third Public Open House was held to provide the public with an opportunity to review and comment. . .'. This is a typo. Is it supposed to say the fourth Public Open House? Please confirm and make correction.	The report has been updated to reference the fourth open house.
14.	Section 3.4.1	12. On page 27, the EA report refers to 'Teston Road EA'. Is this term referring to the proposed project or the EA report. It is recommended that reference to common terms be consistent throughout the EA report by defining it at the beginning of the report and then using the same term throughout.	This term is referring to the proposed project. Updates have been made throughout the report for consistency.
15.	Section 3.6	13. An update to the Indigenous Peoples Consultation section commencing on page 35 is recommended to reflect the ministry letter dated October 4, 2024, re-confirming the community list for the proposed project.	This communication has been added to Section 3.6 of the report, the Indigenous Peoples Consultation section.
16.	Section 4.3.6.1	14. Section 4.3.6.1 (page 49) refers to consideration of traffic analysis with or without the proposed GTA West (Highway 413). Please note that Ministry of	The report has been updated to use the term Highway 413 (previously referred to as GTA West).

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	Transportation has moved away from using the term 'GTA West'. Please update the EA report to replace GTA West with Highway 413.	
17. Section 8.8. 1	15. Section 8.8.1 (page 217) refers to both ultimate design and interim design. It is not clear in reading this paragraph if the interim design is what will move forward as the preferred design that is part of this comprehensive EA and ultimate design is part of future works that is outside this EA process. Please clarify and revise text as necessary. Same comment applies to section 8.8.2 that refers to 'interim condition'. Does 'interim condition' mean the same as interim design' and is the design that is proposed for this comprehensive EA? Please clarify and revise EA report accordingly. Please also clarify what it means to say 'interim active transportation facilities' in section 8.8.3 and revise report accordingly.	We have clarified in Sections 8.8.1 and 8.8.2 that the interim design is what will be constructed first, and the EA is seeking approval for both the interim and ultimate designs. Right of way constraints in the area of the Keele Valley Landfill require interim active transportation facilities. The ultimate preferred design will be constructed when it is feasible. Both interim and ultimate designs are presented in Appendix B
18. Section 9.9	16. Section 9.9 (pages 243-44) provides a high-level summary of the anticipated property requirements that will be required for the proposed project. Stating how many properties are anticipated to be impacted because of the proposed project before arriving at Table 9-2, is recommended.	The report has been updated to include the number of properties that are anticipated to be impacted within the paragraph located in Section 9.9 of the IEA report.
19. Section 9.10	17. As per section 9. 10 (page 245) construction of a four-lane Teston Road from Keele Street to Dufferin Street is identified in the Region's 10-year capital plan and the widening of Teston Road to four lanes from Dufferin Street to Bathurst Street is currently beyond the horizon of the Region's 10-year capital plan. Furthermore, it is understood that the proposed project is subject to funding availability, as per section 9.12 (page 245). As per page 2 of this memo, all future EA approvals will have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. Ministry staff wanted to highlight this change in the EAA so that York Region is aware of this as it moves through the EA process for its proposed project.	Comment Noted. Details regarding the expiry provisions of the EAA have been included in Section 2.2.
20.	18. Should new information regarding funding availability be confirmed prior to formal submission of EA, please update the EA report accordingly.	Comment Noted. The EA report will be updated if new information regarding funding availability is confirmed prior to formal submission of EA.
21.	19. Given the uncertainty in the timing of when the project might be able to start construction, there may be changes to the project in the future that are inconsistent with the results and conclusions of the EA, because of changes to the environmental landscape and/or changes to legislation and regulations. The EA report should include an amending procedure that may allow York Region to make modifications to the approved project without having to fulfill the requirements of the EAA all over again. The amending procedures, at minimum, should describe a detailed process as to how York Region will assess any new potential environmental effects of the change, identify any additional mitigation measures that may be required, how it will be documented, including consultation. This assumes an EA Notice of Approval is issued for the proposed project. Please visit section 4.2.5 of the EA Codes of Practice for additional information. Please provide a draft of the proposed amending procedures to this branch for our review.	Comment Noted. A section on the EA Amendment process has been added to Section 11.6 which includes reference to section 4.2.5 of the EA Codes of Practice. A copy of the proposed amending procedures has been submitted to the MECP Environmental Assessment Branch for review.
22. Next Steps	<p>The ministry expects that the proponent will provide responses to all ministry comments before the formal submission of the EA and seek the ministry's acceptance of the proposed method of addressing the comments. To facilitate the ministry's review and to support effective issue resolution, please submit responses to all ministry comments in table format, organized by reviewers.</p> <p>The ministry is available to meet with you to discuss any questions you may have and to support you in resolving any issues before the submission of the final EA. This approach is also recommended to address any outstanding comments from other government agencies in accordance with the ministry's EA Codes of Practice.</p> <p>The ministry requires copies of government agencies' comments (i.e., Ministry of Natural Resources and Toronto and Region Conservation Authority) on the draft EA, if</p>	<p>Comment Noted.</p> <p>All MECP review comments and proponent responses have been summarized in table format and submitted to the ministry for review and feedback – with a view to confirming the ministry's acceptance of the proposed methods of addressing the ministry's comments prior to formal EA submission.</p> <p>Copies of all other government agency comments have been provided to MECP along with a table showing how these comments have been addressed.</p> <p>York Region will consult with interested parties about any proposed revisions to the draft EA report including offering to meet with Indigenous communities, and other interested parties. The final EA will include documentation of these activities as well as any changes that were made to the documentation to address comments.</p>

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IEA Comment Summary		
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	<p>any. The records should demonstrate what their comments are, how they are addressed, and confirmation that they have no additional comments on the EA.</p> <p>In advance of submitting the final EA, you may wish to consult interested persons about the revisions, as well as meetings with Indigenous communities, and other interested parties. The final EA should include documentation of those activities as well as any changes that were made to the documentation to address comments.</p>	
MECP – Central Region Technical Support (October 7, 2024)		
1.	<p>Groundwater Comments</p> <ul style="list-style-type: none"> • Appendix K – Drainage and SWM Report • Appendix L – Hydrogeology Report • Appendix M – Contamination Overview Report • Appendix O – Soil Investigation Report <p>Excerpt from preamble (see attached letter for full text):</p> <p>The field methodology and data analysis described in the report are considered acceptable at this planning stage. The recommendations provided within the report are considered as applicable and should be implemented during detailed stages of the project design.</p> <p>Recommendations</p> <ol style="list-style-type: none"> 1. Detailed design stage of the project will need to further evaluate and minimize conflicts with landfill infrastructure and landfill monitoring systems and propose acceptable mitigation measures. Design for depth of construction excavations in support of underground infrastructure should carefully consider nearby landfill waste areas, infrastructure, and monitoring systems. 2. Further investigation of presence of landfill waste and landfill gas along the road alignment is required in close consultation with the landfill owners (City of Toronto, City of Vaughan, and private owner for Disposal Services Landfill) and MECP District Office. The landfill historical mapping, waste location records, landfill monitoring data (landfill gas and groundwater) needs to be reviewed and considered during detailed design stage. 3. The presence of landfill waste within the road ROW should be further investigated during the future geotechnical investigation. 4. Contingency plans are recommended in the event of encountering landfill waste, landfill related infrastructure, impacted soils and gases during construction, especially near the Vaughan and Disposal Services landfills, where waste location details are not well known. A mitigation plan should also be developed, including notification of the landfill operator and control measures to minimize the exposure of construction workers. 5. The presence of methane beneath the proposed roadway must be considered during design, and infrastructure for during- and post-construction mitigation of potential landfill gas exposure should be developed as part of the road design to insure safe conditions for the road users. 6. The detailed road design needs to consider that, gas collection systems at the landfills are active and functioning, however the contingency measures should be incorporated in the design to account for the events of potential failure of the landfill gas collection systems and effects on road users. 7. As noted by WSP (2024), groundwater dewatering associated with the proposed bridge construction across the valley east of Vaughan Landfill may influence the groundwater flow temporarily or permanently and could affect the movement of the chloride plume. Enhanced monitoring of the chloride plume in this area is recommended during and following construction. 8. Location and design (depth) of stormwater management facilities and infrastructure will need to consider potential long-term effects on groundwater conditions and landfill related infrastructure, to minimize any potential impacts to existing plumes and monitoring activities at the landfills. 	<p>Comments Noted. See below for how each of these has been addressed. We have numbered the points in both the comment and response for clarity.</p> <ol style="list-style-type: none"> 1. This commitment has been included in Section 10.6.5 of the EA report. 2. This commitment has been included in Section 10.2 of the EA report. 3. This commitment has been included in Section 10.2 of the EA report. 4. This commitment has been included in Sections 10.2 and 10.6.5 of the EA report. 5. Mitigation measures to address this comment have included in Section 10.2 of the EA report. 6. The potential environmental effect has been recorded in Section 10.2 of the EA report along with a recommendation that YR adopt a Standard Operating Procedure (SOP) to address potential failure of landfill gas systems, and, a commitment to review this SOP with the landfill owners / operators and with MECP at the detail design stage of the project. 7. WSP’s 2024 Preliminary Foundation Report (Appendix R2 to the EA Report) states that “Construction of the bridge footings ... will take place within the engineered fill above the groundwater level and as such, dewatering is not expected to be required”. However, the Hydrogeology Report (Appendix L to the EA Report) states that “It is noted, however, that the design of the bridge is preliminary, and the actual depth of the spread footings is not finalized. It is prudent to consider that dewatering of silty sand and lowering of the water table by up to two metres may be required.” and “Detailed dewatering calculations to determine flow rate and radius of influence will be required during detailed design.” Further review of the possible need for enhanced compliance monitoring can be considered at detail design. 8. Commitments have been included in Section 10.2 of the EA report to address infiltration concerns from storm drains. 9. Please see above response to comment #7. Commitments have been included in Section 10.2 of the EA report to follow construction dewatering related permitting requirements. 10. This commitment is included in Section 10.2 of the EA report. 11. This commitment is included in Section 10.2 of the EA report. 12. This commitment has been included in Section 10.2 of the EA report. 13. This commitment has been included in Section 10.2 of the EA report. 14. Section 11.4.1 of the EA report includes commitments to conduct EA compliance monitoring during the detail design and construction phase of the project. The need for long term monitoring will be determined at the detail design stage of the project.

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	<p>9. Further assessment of potential impacts on groundwater levels near proposed deep excavation sections requiring dewatering will be required. Construction dewatering related permitting requirements should be followed as applicable (PTTW, EASR).</p> <p>10. As acknowledged by WSP (2024), a Phase Two ESA will be required across properties with PCAs before a Record of Site Condition (RSC) can be submitted for the Site. A Phase Two ESA is therefore recommended for Properties 1 & 2, 4, 5 and 8 which includes seven APEC.</p> <p>11. 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. Appropriate stormwater design measures for isolation of impacts resulting from road salt application should be implemented.</p> <p>12. Geotechnical investigation for the project needs to evaluate in detail the potential for during- and post-construction ground settlement as it relates to landfill waste areas, landfill cover and local groundwater conditions.</p> <p>13. Detailed geotechnical investigation should also include assessment of potential impacts of ground disturbance effects related to road construction on Keel Valley landfill leachate collection main that extends underneath the proposed road, as well as, on Teston Road Purge Well System and Vaughan/Keel landfill gas extraction and monitoring wells. The results of completed assessment should propose construction methods that will minimize the potential impacts and provide mitigative measures to be implemented during road construction.</p> <p>14. Final project design report will need to include detailed short- and long-term monitoring and mitigation plan related to landfill effects, groundwater resources impacts, landfill gas and ground settlement.</p>	
2.	<p>Surface Water</p> <ul style="list-style-type: none"> Draft IEA Report Appendix M – Drainage and Stormwater Management Report <p>In general, I concur with the recommendations provided in both reports. I offer the following comments for consideration:</p> <p>1. The IEA report asserts (p.241) that “due to the urban corridor, vegetative buffers, filter strips and enhanced swale along the corridor are not practical.” I do not agree with this statement. These LID methods have been developed in order to accommodate cases like this one and could be applied in areas not in close vicinity to the landfills. The cumulative impact of stormwater resulting from the road widening should be considered with higher emphasis placed on the protection of the environmental receivers.</p>	These LIDs have not been proposed in this ROW for the preliminary design but can be explored in the detailed design stage. However, enhanced swales have been proposed at the sewer outlet.
3.	<p>2. It is indicated in the SWM report (p.26) that “documentation is not available to verify whether the existing SWM facilities (within the subdivisions) have sufficient capacity to service the future Teston Road widening”. Given that the existing stormwater management facilities have been built recently, documentation for them should be available. I recommend the proponents and their consultants do more to locate the needed documents and incorporate them in their evaluation of SWM for the project.</p>	Information was pending at time of previous submission. The report has been updated and further pond treatment capacity will be evaluated and verified during detailed design.
4.	<p>3. The MECP’s ‘Enhanced Water Quality Protection’ Level 1 should be applied to all stormwater management facilities. When a stand-alone SWM control cannot achieve Level 1 protection, a treatment train approach that includes vegetative buffers, bioswales, OGSs and/or infiltration trenches should be considered in suitable areas.</p>	Comment noted. Table 16 suggests the treatment train approach for various outlets which may include an OGS system combined with other detention storage. Additionally, the existing ponds provides quantity and quality treatment of runoff originating from the Teston Road right-of-way.
5.	<p>Air Quality</p> <ul style="list-style-type: none"> Appendix H – Air Quality Assessment Report Sections 5.4.6 and 10.4.3 <p>According to Appendix M Contamination Overview Study Report prepared by Morrison Hershfield and dated October 27, 2022, the location of the proposed Teston Road extension is situated between three landfills where soil contamination may have occurred. Additionally, the Phase 1 Environmental Site Assessments (ESAs) identified several areas of potential environmental concern (APEC) in the study area that have</p>	Comments Noted. These recommendations will be considered during the detail design phase.

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	<p>the potential to emit contaminants of concern as a part of fugitive dust. Therefore, when soil excavation activities occur during the construction phase, the ministry recommends:</p> <ol style="list-style-type: none"> when soil excavation activities occur during the construction phase, onsite ambient air monitoring takes place at the sensitive receptors identified in the AQA report for the site-specific contaminants identified within the APEC. The proponent should consider notifying the ministry's York Durham District Office of any ambient air quality criteria exceedances of the contaminants of concern during the construction phase of this project. Where possible, reduce soil excavation activities and ensure that adequate dust mitigation measures are in place during forecasted windy conditions. 		
6.	During the operation phase, the ministry concurs with the proposed mitigation measures of planting coniferous trees and shrubs, as noted in Section 5.0 of the AQA report. Further to this, the ministry suggests that the proponent consider vegetating near the identified worst-case sensitive receptors (Receptors 12, 14, 16, and 17) to further minimize off-site particulate impacts.	It should be noted that plantings in these areas have already been included in the design, as shown in Appendix B. Additional plantings in this area will be considered during the detail design phase, however, due to property and grading constraints, additional trees beyond what has been proposed may not be feasible.	
7.	The ministry recommends that a complaint response protocol be prepared that outlines the measures that will be implemented when dust and/or odour complaints are received during the construction phase of the project and should include local district office notification.	Comment Noted. These recommendations will be considered during the design and construction phases of the project.	
MECP – York Durham District Office (September 26, 2024)			
1.	Section 5.4.3.1	Noting that Vaughan's planning for the North Maple Regional Park has been ongoing for a number of years, and itself includes a number of agencies, permitting and other processes, a reference for the timing and park scope described in section 5.4.3.1 would be appreciated. It may be conservative to consider potential future parkland use and receptors in proximity to the roadway, but does not remove landfill considerations.	The City of Vaughan (via their NMRP consultant O2) has provided extensive comments as part of the draft report review on the park as it relates to this project. These comments have been included in this table. Additionally, we have added additional details to Section 5.4.3.1. as requested, based on these comments, available online information and in discussion with the City. Coordination between the City of Vaughan and York Region regarding this project will continue to occur during future phases of the project.
2.	Section 5.6.12 and Appendix M (Contamination Overview Study)	Section 5.4.3.1 and Appendix M (Contamination Overview Study) discuss 'Potentially Contaminating Activities'(PCA) and 'Areas of Potential Environmental Concern' (APEC) – both of which are defined terms in O.Reg 153/04 'Records of Site Condition'. The EA and appendix are not consistent with the use of these terms under O.Reg 153 or O.Reg 406, and have grouped many separate properties and activities into generalized PCA/APEC which significantly under represents the potential for impacts across the study area. Where a PCA like waste management is identified, this cannot be treated as a single APEC spanning waste management activities across nearly a dozen properties. Similarly, fuel storage PCA's would be specific to individual tanks and activities at each individual garage, gas station and other industrial activities and cannot be treated as a single APEC. This also applies to other broadly grouped PCA/APEC including chemical storage and manufacturing activities. As the assessment of potential contamination is intended to inform potential property acquisitions, construction considerations and soil use or reuse, refinement is required to ensure individual PCA are adequately evaluated and property specific APEC assessed.	The COS was edited to define the road alignment (a line) and the study area (a 500 m offset from the line), to use the term PCAs as applicable, and to revise the use of term APEC. The COS was also edited to distinguish the individual PCAs in group 2. Section 5.6.2 of the EA Report has been modified accordingly.
3.	Section 5.6.12.1	The approach to the Keele Valley Landfill Site (KVLS) does not appear to recognize the site as defined by the Environmental Compliance Approval (ECA). Several figures focus exclusively on the waste footprint and do not acknowledge the entire approved site including the primary and secondary buffer lands, also subject to the ECA and where landfill infrastructure, mitigation and contingency infrastructure is either currently operating or may be constructed in the future.	In the Hydrogeology Report and EA Report, Figures have been updated to show landfill areas, and primary and secondary buffers. ECA numbers have been included, along with much more discussion of the fact that the project can not in any way restrict post-closure operating and maintenance activities for these landfills, including any contingency measures that may be contemplated, during their contaminating lifespan.
4.	Section 5.6.12.1	The reference to relevant legislation/instruments for the KVLS does not include the many notices of amendment, or separate storm water and air ECAs associated with the site. While the ministry is currently reviewing a request to consolidate the ECAs, the entirety of the approval should be considered, especially the December 20, 2006	In the Hydrogeology Report, the text and figures have been significantly updated to include all the noted documents, and to address their requirements and implications. The EA Report has been modified accordingly.

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		Notice of Amendment #35 which incorporates the Closure Plan and long-term site maintenance, monitoring and management requirements. (section 11, Appendix references)	
5.	Section 5.6.12	Section 5.6.12 indicates future discussions with Toronto will be used to determine landfill limits, ECA applicability. The MECP's approvals are not subject to Toronto's interpretation of what is already defined in these permissions and future discussions should focus on assessing current and future landfill operations, monitoring and contingencies managed by Toronto within and adjacent to the proposed roadway.	The text noted at left has been removed from Section 5.6.12.1 of the EA Report. EA Report Executive Summary and Section 11.3.5 Environmental Compliance Approvals have been modified to include a statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure, operations, monitoring and contingencies associated with the construction of the Teston Road project.
6.	Section 5.6.12.1	The reference to D series guidelines is not directly applicable to KVLS, but should be considered by the Region where they are proposing work in proximity to three closed landfills.	The text noted at left has been removed from Section 5.6.12.1 of the EA Report. A section on consideration of MECP's D-Series Guidelines on Land Use and Compatibility has been added to Appendix L - Hydrogeology Report and summarized in EA Report Section 11 – Future Commitments and in the EA Report Executive Summary. 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), York Region commits to working with the landfill owners and MECP to reasonably mitigate and/or address any impacts or issues of concern.
7.	Section 5.6.12.2	The reference to two chloride plumes appears to be an outdated reference to possibly a Vaughan Landfill Site (VLFS) reference. KVLS monitoring includes nine distinct plumes that have been historically identified, including those originating upgradient of the site non-landfill derived plumes at the site. Notably references in Appendix L for KVLS do not include the 2006 Closure Plan or any monitoring reports within the last 20 years. If this reference is intended to reflect only the KVLS purge well system and monitoring along the Teston right of way, that should be clarified and again supported with a reference.	In the Hydrogeology Report: Text has been updated to make it clearer about the number of plumes. Text has been updated to include reference to the 2006 Closure Plan which was reviewed. The impact assessment and recommended mitigation measures were updated accordingly. Section 5.6.12.2.1 of the EA Report has been modified accordingly.
8.	Section 5.6.12.3	The discussion of the Disposal Services or Testonview Holdings landfill does not acknowledge the infrastructure associated with that landfill, notably relating to leachate and landfill gas. Again, there may be recent monitoring reports available to describe these operations and area conditions.	In the Hydrogeology Report and the Soil, Waste and Landfill Gas Report: Text and figures were updated to document the Disposal Services Landfill leachate collection system and the groundwater and gas monitoring systems. A summary of this information is included in Section 5.6.12.3 of the EA Report.
9.	Section 5.6.12.3	The Testonview Holdings landfill is the subject of a Provincial Officer's Order, which pre-dates subsequent landfill ECA amendment and more recent monitoring and reporting. There has been no 'provincial offense' relating to this property (as described in Appendix L).	In Hydrogeology Report: Text was updated to remove the incorrect wording.
10.		The IEA has divided the project into sections, and it should be clarified that while this may facilitate report organization, some road segment issues apply beyond the definition of that segment, i.e. landfill issues are present with the Testonview Holdings landfill in the Keele-Rodinea section and extend into the Valley crossing section to the east.	In the Hydrogeology Report and the Soil, Waste and Landfill Gas Report: The text and figures were updated to address this comment, and the scope and complexity of the impact assessment was expanded.
11.	Appendix K (Drainage and Stormwater Management Report)	While section 10.6.1.5 of the IEA indicates stormwater management infrastructure should consider landfill gas migration, this is not reflected in Appendix K. Broadly, all subsurface utilities have the potential to act as preferential pathways for landfill gas (or potentially other contaminant vapours), and the KVLS ECA describes the requirements for collars and trench-plugs for utilities which may appropriate for future infrastructure in this area.	Appendix K has been amended to acknowledge the potential for landfill gas to be present within the Teston Road right-of-way and for subsurface utilities to have the potential to act as preferential pathways for landfill gas. A recommendation has been added to Appendix K that storm sewer systems must be designed so that they do not become preferential pathways for the migration of landfill gas and they must be protected from the ingress of landfill gas. Additional details are provided in Appendix O – Soil, Waste and Landfill Gas Report - and are summarized in the EA Report.
12.		Under future commitments, ECA amendments are identified as a task for landfill owners. As has been raised at previous meetings, ownership of portions of landfill properties and responsibility for changes to any of the landfill operations should be discussed with the site owners as creation of the roadway is not currently related to any of the 3 landfill operations or long-term requirements.	Agreed.
13.	Appendix L (Hydrogeology Report)	Hydrogeology has compared results of groundwater monitoring to Provincial Water Quality Objectives and York sewer-use criteria. While this may be relevant to dewatering and potential discharges, it should be clarified if groundwater quality evaluation will also serve other objectives. Notably, the IEA indicates Records of Site Condition may be required, and O.Reg 153 criteria, or potentially component values	In Hydrogeology Report: Text updated accordingly: "In the event that property transfers are required, Record of Site Condition may also be required. The process for this typically starts with completion of a Phase One Environmental Site Assessment, and it is noted that seven of these were prepared as part of the EA for 8 specific parcels. Groundwater sampling carried out as part of the current assessment did not

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	may be appropriate to apply to site contamination and where sensitive receptors are present.	specifically address the APECs and PCAs identified in these reports. It will be the responsibility of the Qualified Person filing for RSC to ensure that groundwater is properly considered under that process.”
14.	Sampling has focused on general chemistry, nutrients and metals and should be expanded to consider the potential contaminants of concern that relate to site specific PCA/APEC (i.e. landfill indicator parameters, fuels, or chemicals relating to specific industrial operations etc.). Again, the relevance of groundwater characterization to acquisitions, RSCs or in relation to specific receptors (i.e. subsurface workers, discharge to surface water etc.) may consider additional parameters.	In Hydrogeology Report: Text updated accordingly: “In the event that property transfers are required, Record of Site Condition may also be required. The process for this typically starts with completion of a Phase One Environmental Site Assessment, and it is noted that seven of these were prepared as part of the EA for 8 specific parcels. Groundwater sampling carried out as part of the current assessment did not specifically address the APECs and PCAs identified in these reports. It will be the responsibility of the Qualified Person filing for RSC to ensure that groundwater is properly considered under that process.”
15.	Appendix O Soil Investigation Report. This appendix and elsewhere in the IEA has selected site condition standards without clearly providing a rationale for the choice. The use of Table 1 in the vicinity of the KVLS may relate to Toronto’s historic approach to site cover quality, which considered the site’s proximity to environmentally sensitive features, and this would also be appropriate to consider in landfill to Dufferin road segment crossing the Don.	Text has been updated to address this comment.
16.	The Region is reminded that the application of non-potable standards under both O.Reg 153 and O.Reg 406 requires notification to the Region under S.35 of O.Reg 153. This process does consider other groundwater use in the vicinity of the request and is described in the Region’s policy https://www.york.ca/business/land-development/non-potable-requests-brownfield-development	Section 11.3.7 Non-Potable Groundwater Requests has been added to the EA Report with a summary of this requirement including the link at the left to the York Region website.
17.	Generally, very limited information has been reviewed in relation to the extensive landfill infrastructure present in the vicinity of the proposed alignment and while future studies are proposed to develop more detailed designs, this work must engage the landfill owners and ensure that the integrity of landfill operations, in addition to road and multi-use-path users, and future road workers is protected. Leachate and landfill gas infrastructure has been oversimplified in the IEA, and landfill liner and capping are also vital engineered components to the 3 landfills. More recent monitoring reports and approvals should be considered in evaluating the feasibility of specific infrastructure and operational changes.	Significant modifications have been made to Appendix L – Hydrogeology Report and Appendix O which has been renamed as the “Soil, Waste and Landfill Gas Report” including details on landfill infrastructure, liners and capping, as well as potential impacts (to infrastructure, operations and compliance monitoring) and recommended mitigation measures. Figures showing the groundwater and leachate-related infrastructure have been improved in the Hydrogeology Report and those showing the landfill gas-related infrastructure have been improved and moved to the Soil, Waste and Landfill Gas report. Corresponding updates have been made to the EA Report.
MECP – Species at Risk Branch (September 10, 2024)		
1.	General	Proponent may require some form of permission from the permissions branch. Client is aware that a separate submission specific to an Endangered Species Act review is required.
Ministry of Environment Conservation and Parks (MECP) – Conservation and Source Protection Branch (September 3, 2024)		
1.		No further comments from a source protection perspective
MECP – Climate Change Policy Branch (September 17, 2024)		
1.		No comments
MECP – Adaption and Resilience Branch		
1.		No comments

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	MECP – Environmental Permissions Branch – Noise and Air Quality (September 23, 2024)		MECP Responses (June 27, 2025)	
1.	Appendix G – Environmental Noise Report	Section 2.2.2	Explain in more detail how the NSAs were determined and how representative receptors were located. How far away from the road should NSAs extend and was this determined by contouring of sound levels? Also, how similar are the overall noise levels and changes in sound levels among noise sensitive areas / lots represented by a single receptor?	Representative receptors were chosen to assess areas with similar overall noise levels and similar changes in noise. In general, receptors were chosen that were the most exposed to noise from the roadway expansion. For the homes, west of Dufferin Street, north of the new structure, homes were also chosen further back from the proposed Teston Road to estimate possible project impacts. Our approach follows the methodology commonly used by the MTO in the Environmental Guide for Noise (2023).
2.		Section 2.6	Please provide justification as to why an implementation of traffic noise modelling in Cadna/A is used rather than the STAMSON software or the latest working version of TNM that is approved by the FHWA. Please provide representative calculations using either STAMSON or the latest working version of TNM approved by FHWA to show reasonable consistency of results	<p>The Cadna/A implementation of the STAMSON/ORNAMENT model was used due to its ability to handle complex ground elevations, multiple barriers, and receptors. The Cadna/A software also considers screening from buildings that are located between the roadways and NSAs. SLR staff have used this approach in a number of projects which have been reviewed by MECP and MTO.</p> <p>This approach was first used in 2008 for the Highway 407 East Extension Environmental Assessment project. Other environmental assessment projects where this approach has been used include:</p> <ul style="list-style-type: none"> •Ninth Line EA (Eglinton to Derry) •Yonge Street (Queen St to College/Carlton St) EA •Rossland Road EA •Lakeshore Road BRT •Teston Road (Pine Vally to Kleinburg) •Regional Road 17 Realignment EA <p>At the time of the preparation of this noise report the TNM was not approved for use on municipal environmental assessments. A sample calculation has been provided in Appendix D of the updated report.</p>
3.		Section 2.7, Table 5 and Section 2.8	Receptors 7 to 9, 18 and 19 are given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation should be deferred until levels are above 60 dBA. Please clarify.	<p>Acknowledged, changes have been made to the report to reflect the comments provided. Noise mitigation should be deferred to detail design when the “future build” sound levels are below 60 dBA.</p> <p>The York Region policy and the need for noise mitigation</p>

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			<p>is based upon sound levels being in excess of 60 dBA and mitigation can be deferred until sound levels reach that point. By the time this project proceeds to detail design the traffic volumes may have changed. In addition, there should be a revised noise analysis following 90% design and the vertical and horizontal alignment of the roadway could change.</p> <p>A developer-built barrier is already specified for Receptors 7 to 20.</p>	
4.		Receptor 4 is given Note [3] in Table 5, which states that the decision to implement noise mitigation should be deferred to detail design, but in Section 2.8 it is stated that noise mitigation is not possible due to a driveway, which is the subject of Note [2] in Table 5. Please clarify.	At this point in the design, it is expected that noise mitigation is not likely possible due to the need to maintain an entrance to this building. This would be further considered as part of detail design. However, the note has been changed in the updated report.	
5.		Please note that the terms “Receptor” and “Receiver” are both used in Table 5. The discussion in this review assumes they are interchangeable.	Comment noted. Changes have been made to the report.	
6.		Please provide sample calculations for representative receptor results.	See response to Comment regarding Section 2.6. A sample calculation has been provided in Appendix D of the updated report.	
7.	Section 4	In the area west of Keele Street, the receptors on the south side were the focus of the study. Please discuss the potential for receptors to the north of Teston Road. There are future developments shown in Appendix B as well as in the IEA Report, page 218.	The proposed development in question adjacent to Teston Road appears to be mixed-use in nature with commercial blocks adjacent to Teston and residential further north. The proposed widening of Teston Road will have no effect on the proposed residential development. In addition, the development further north will be more influenced by road traffic on Keele Street. The developer of this property is responsible for accounting for noise from existing Keele Street and Teston Road.	
8.	Figure 1 and Figure 2	The study area boundary for this noise study shown in Figure 1 appears to extend farther west than the westernmost receptors considered and shown in Figure 2. Please clarify.	That is true. The study area extends beyond the limits of construction to account for possible impacts at receptors at each end of the study.	
9.	Figure 3	It appears that Dufferin Street has been mislabelled.	The map is labelled correctly.	
10.		Should houses to the west of Receptors 21 to 25 be considered (on the west side of Germana Pl.)?	The most exposed homes for this noise study were chosen (Receptor 21 to 25). The homes west of Receptors 21 to 25 would have considerably lower sound	

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			levels due to the shielding caused by rows of homes and the increased distance from Keele Street. Further analysis should be conducted as part of detail design.	
11.		Please comment on why a barrier cannot be placed to the west of the driveway for Receptor 6. Would there be any new road running north from Teston Road to the future subdivision along the west side of this receptor?	Based on an initial review of the sound levels at Receptor 6, a noise barrier is not considered feasible technically and from a cost perspective. Further analysis should be conducted as part of detail design.	
12.		There is an existing house to the west of the future receptors.	Based on an initial review of the sound levels the existing residences west of the future receptors, a noise barrier is not considered feasible technically and from a cost perspective. Further analysis will be conducted as part of detail design. It is understood that the residence to the west of the residential development may not be present.	
13.	Figure 4	There is a house to the west of Receptor 27 which is shown to not have a barrier. Please clarify	The existing noise barrier was incorrectly implemented into the model. The location has been adjusted to encompass the backyard of the residence to the west of Receptor 27.	
14.	Appendix B	Some grades are significant enough to possibly affect the noise modelling. Please comment.	SLR agrees that grade changes can possibly affect the noise modelling. However, grade changes are only necessary to apply in the uphill direction which accounts for 50% of the overall PWL from the roadway. Calculations do not account for drivers reducing the throttle on vehicles as they descend downhill in the other direction. The area in proximity to Fenyrose Avenue has grade changes in both directions of approximately 4.2%. This results in an increase to the PWL of Teston Road of approximately 0.7 dBA in each uphill situation. Overall, this increases the predicted “future build” sound level at the adjacent Receptor 27 by 0.4 dBA from 53.4 to 53.7 dBA and is considered a negligible change to the overall results of this assessment. Therefore, further updates to the PWLs calculated in Appendix B are not required.	
15.	Appendix D	How were the sound power levels (PWL) derived?	The roadway noise prediction model used, colloquially called the “Cadna ORNAMENT Hack” by SLR staff, is based on the ORNAMENT road noise prediction algorithms produced by the MECP. The MECP “STAMSON” highway noise prediction model is a computerized version of this method. Both methods are simplified versions of the United States Federal Highway Administration Method.	

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			<p>Noise emission rates (PWL') and source heights for the roadways as line sources are calculated in a spreadsheet using the ORNAMENT algorithms, based on the traffic mix (number of vehicles, percent medium and trucks), time period, speed, pavement type and roadway gradients.</p> <p>The roadways are modelled as line sources in Cadna/A. Propagation calculations from the source to the receiver and the barrier effects of terrain, buildings, and noise barriers are based on the ISO-9613-2 noise model equations.</p> <p>The Cadna/A model is used because of its ability of handle complex ground elevations, multiple barriers, and receptors. The Cadna/a software also more accurately considers screening from buildings that are located between the roadways and the NSAs.</p>	
16.		The completion of the MECP's noise and vibration review of this project is not an MECP's endorsement of criteria/limits set by other agencies, such as City of Vaughan, York Region, MTO, etc.	Comment Noted.	
MECP – Environmental Assessment Branch (October 31, 2024)				
1.		<p>EA Modernization</p> <p>As you are aware, the ministry is modernizing its almost 50-year-old EA program to better serve communities now and in the future. Regulatory changes this year include the move to a project list approach under the EAA that included proclaimed relevant provisions to the Act, making several new regulations and making changes to existing regulations.</p> <p>This includes a new designation and exemption regulation under the EAA, titled Part II.3 Projects – Designations and Exemptions. This regulation is referred to by the ministry as the Comprehensive Environmental Assessment Projects Regulation and it lists all the projects that are designated under the EAA, as well as exempted projects for transit, waste, and</p>	Comment Noted. This project (which has an approved Terms of Reference) will continue in the Comprehensive EA process.	No further comment.

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		<p>electricity, which are subject to a streamlined process.</p> <p>With these changes, the EAA will generally apply to projects designated in the Comprehensive EA Projects Regulation and other regulations under the EAA and projects to which an approved Class EA applies.</p> <p>There is no impact to projects that previously followed an EA under the EAA and were approved. Also, all projects which have started an EA application (i.e., approved ToR) will continue in the EA process. Please visit the ministry website here to hear more about all the EA modernization initiatives</p>		
2.		<p>Expiry of Approval</p> <p>In 2020, EAA amendments also provided for expiry date provisions for EA approvals with an objective to account for potential changes in the environment or regulatory standards.</p> <p>All EA approvals including historical approvals for projects that have not been implemented yet now have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. The expiry provisions came into effect in February 2024. Please see section 17.25 of the EAA for additional information</p>	<p>Comment Noted. Details regarding the expiry provisions of the EAA have been included in Section 2.2 of the updated EA Report.</p>	<p>No further comment.</p>
3.		<p>General Comments</p> <p>1. The project title and throughout the draft EA report there are references to the term 'individual environmental assessment'. There is also reference to the term 'undertaking' throughout the draft EA report.</p> <p>In February 2024, Part II of the EAA was repealed and Part II.3 was proclaimed into force. Several regulations, including O. Reg.</p>	<p>Throughout the main EA report we have made the change to Comprehensive EA and added an explanation on this change to both the Executive Summary and the main report (Section 2.2).</p> <p>We have replaced the use of the word "undertaking" with "project" within the report.</p>	<p>No further comment.</p>

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		<p>53/24 (General and Transitional Matters), were also made under the EAA. In accordance with the transition provisions set out in O. Reg. 53/24, your undertaking, as described in your ToR, is now deemed to be a Part II.3 project and the application will be deemed to have been submitted under subsection 17.2(1). Following the move to Part II.3, the term 2 “individual” with respect to environmental assessments was replaced with “comprehensive” and the term “undertaking” with “project” or “Part II.3 project”. References to the EAA should also be updated as appropriate with the repeal of Part II of the EAA.</p> <p>It is recommended that any references to ‘individual’, including the project title, be either removed and/or replaced with ‘comprehensive’. Include an explanation in the Executive Summary and in the main body of the EA report why this change was necessary. The ministry is also recommending that any references to the word ‘undertaking’ be replace with ‘project’.</p>		
4.	Title Page and Exec Summary	2. In the ‘Environmental Effects and Mitigation’ section there is reference to the Ministry of Natural Resources and Forestry (MNRF) Aurora District...”. Please note this ministry is now called the Ministry of Natural Resources. Please update the draft EA to reflect the new ministry name throughout the document.	Use of “Ministry of Natural Resources” has been updated in the EA report.	No further comment.
5.		3. Will the cost estimates for the proposed project be added in the final EA in the section entitled ‘Preliminary Cost Estimate’ as well as in section 9.10 (page 287)?	Yes, they were added to the draft EA which was published for public review. When this draft was provided to MECF, we were still in the process of confirming the cost estimates.	No further comment.
6.		4. It is recommended that the sections of the main report that are referenced in the Executive Summary include specific section numbers, so that readers know where to go	Specific section references have been added to the Executive Summary.	No further comment.

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		for more detailed information for that specific item.		
7.	Main Report	<p>5. In the Introduction section (page 1), there is reference to the Teston Road Area Transportation Improvements IEA study area. However, in the Executive Summary, there is reference to 'Teston Road study area' under the sub-section called 'Archaeology, which is the same as Figure 1-1.</p> <p>The ministry understands that specific technical studies may have differing study area boundaries based on the type of impact being assessed. However, when referring to the main project study area, it is recommended that reference to the project study area be consistent throughout the document, by defining it first and referring to it in the same manner throughout the EA report.</p>	The study area within the noted section is referring to the overall study area, we have made adjustments throughout the report for clarity.	No further comments.
8.	Section 1.2	<p>6. In section 1.2: Purpose of the Project (page 2) is stating the following:</p> <p><i>The purpose of this IEA is to generate a transportation solution that addresses a variety of transportation problems and opportunities in the study area. The project considered improvements for the movement of vehicles, pedestrians, cyclists, and transit.</i></p> <p>As per section 4.2.1 of the EA Codes of Practice, the proponent, at the EA stage, must revisit the problem or opportunity that prompted the EA process. A preliminary description of the purpose statement that was used in the approved ToR is appropriate. However, for the EA report, a detailed definition of the purpose of the project should be described in this section. Please revise this section of the EA report to</p>	Updates have been made to Section 1.2 Purpose of the Project to provide a detailed definition of the purpose of the project including (but not limited to) a revisiting of the problem or opportunity that prompted the EA process.	No further comment.

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		provide a detailed definition of the purpose of the project.		
9.	Section 2	7. Given recent changes to the EAA, statements such as 'Given the scope, complexity, and scale of this Project, an IEA is required to meet the requirements of Ontario's EAA' is no longer an accurate statement. Suggest changing it to indicate that 'as per the approved ToR, the proponent felt that given the scope, complexity and scale of the project, an EA should be prepared'.	Updates have been made to Section 2 as indicated.	No further comment.
10.		8. It may be helpful to include in the draft EA report, how the EAA currently applies to this project. As described above, the project is subject to transition provisions under the EAA, which identify that a project with an approved ToR is deemed to be Part 11.3 project. The project, as defined in the ToR, is subject to the EAA.	This update has been made to Section 2 of the report.	No further comment.
11.	Section 2.2	9. In section 2.2 (page 5) it states that although the EA process is now referred to as Comprehensive Environmental Assessments, for the purposes of continuity, this EA report will continue to refer to Individual Environmental Assessment or IEA. The EA report should be updated to align with the changes made to the Act in February 2024, as per the above. The ministry is no longer using the term 'individual EA'. By referring to this change at the start of the EA report will provide that clarity to readers.	Throughout the main report we have made the change to Comprehensive EA and added an explanation on this change to both the Executive Summary and the main report (Section 2.2).	No further comment.
12.	Section 3.2.4	10. Section 3.2.4 (page 25), states that the 4th Public Open House was held virtually in December 2023 due to the COVID-pandemic restrictions. Why did York Region continue to hold virtual open houses at a time when there were no longer COVID restrictions?	We've removed the reference to COVID restrictions. York Region continues to host online open houses as they often ensure greater engagement and are more accessible for a wider range of participants.	No further comment.
13.	Section 3.2.4	11. This same page states that the 'third Public Open House was held to provide the public	The report has been updated to reference the fourth open house.	No further comment.

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		with an opportunity to review and comment. . . This is a typo. Is it supposed to say the fourth Public Open House? Please confirm and make correction.		
14.	Section 3.4.1	12. On page 27, the EA report refers to 'Teston Road EA'. Is this term referring to the proposed project or the EA report. It is recommended that reference to common terms be consistent throughout the EA report by defining it at the beginning of the report and then using the same term throughout.	This term is referring to the proposed project. Updates have been made throughout the report for consistency.	No further comment.
15.	Section 3.6	13. An update to the Indigenous Peoples Consultation section commencing on page 35 is recommended to reflect the ministry letter dated October 4, 2024, re-confirming the community list for the proposed project.	This communication has been added to Section 3.6 of the report, the Indigenous Peoples Consultation section.	No further comment.
16.	Section 4.3.6.1	14. Section 4.3.6.1 (page 49) refers to consideration of traffic analysis with or without the proposed GTA West (Highway 413). Please note that Ministry of Transportation has moved away from using the term 'GTA West'. Please update the EA report to replace GTA West with Highway 413.	The report has been updated to use the term Highway 413 (previously referred to as GTA West).	No further comment.
17.	Section 8.8. 1	15. Section 8.8.1 (page 217) refers to both ultimate design and interim design. It is not clear in reading this paragraph if the interim design is what will move forward as the preferred design that is part of this comprehensive EA and ultimate design is part of future works that is outside this EA process. Please clarify and revise text as necessary. Same comment applies to section 8.8.2 that refers to 'interim condition'. Does 'interim condition' mean the same as interim design' and is the design that is proposed for this comprehensive EA? Please clarify and revise EA report accordingly. Please also clarify what it means to say 'interim active transportation	We have clarified in Sections 8.8.1 and 8.8.2 that the interim design is what will be constructed first, and the EA is seeking approval for both the interim and ultimate designs. Right of way constraints in the area of the Keele Valley Landfill require interim active transportation facilities. The ultimate preferred design will be constructed when it is feasible. Both interim and ultimate designs are presented in Appendix B	No further comment.

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		facilities' in section 8.8.3 and revise report accordingly.		
18.	Section 9.9	16. Section 9.9 (pages 243-44) provides a high-level summary of the anticipated property requirements that will be required for the proposed project. Stating how many properties are anticipated to be impacted because of the proposed project before arriving at Table 9-2, is recommended.	The report has been updated to include the number of properties that are anticipated to be impacted within the paragraph located in Section 9.9 of the IEA report.	No further comment.
19.	Section 9.10	17. As per section 9. 10 (page 245) construction of a four-lane Teston Road from Keele Street to Dufferin Street is identified in the Region's 10-year capital plan and the widening of Teston Road to four lanes from Dufferin Street to Bathurst Street is currently beyond the horizon of the Region's 10-year capital plan. Furthermore, it is understood that the proposed project is subject to funding availability, as per section 9.12 (page 245). As per page 2 of this memo, all future EA approvals will have a 10-year expiry date from the date of approval unless otherwise specified in the project's Notice of Approval. Ministry staff wanted to highlight this change in the EAA so that York Region is aware of this as it moves through the EA process for its proposed project.	Comment Noted. Details regarding the expiry provisions of the EAA have been included in Section 2.2.	No further comment.
20.		18. Should new information regarding funding availability be confirmed prior to formal submission of EA, please update the EA report accordingly.	Comment Noted. The EA report will be updated if new information regarding funding availability is confirmed prior to formal submission of EA.	No further comment.
21.		19. Given the uncertainty in the timing of when the project might be able to start construction, there may be changes to the project in the future that are inconsistent with the results and conclusions of the EA, because of changes to the environmental landscape and/or changes to legislation and regulations. The EA report should include an amending procedure that may allow York Region to make modifications to the approved project without having to fulfill the	Comment Noted. A section on the EA Amendment process has been added to Section 11.6 which includes reference to section 4.2.5 of the EA Codes of Practice. A copy of the proposed amending procedures has been submitted to the MECP Environmental Assessment Branch for review.	Under review.

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		requirements of the EAA all over again. The amending procedures, at minimum, should describe a detailed process as to how York Region will assess any new potential environmental effects of the change, identify any additional mitigation measures that may be required, how it will be documented, including consultation. This assumes an EA Notice of Approval is issued for the proposed project. Please visit section 4.2.5 of the EA Codes of Practice for additional information. Please provide a draft of the proposed amending procedures to this branch for our review.		
22.	Next Steps	<p>The ministry expects that the proponent will provide responses to all ministry comments before the formal submission of the EA and seek the ministry's acceptance of the proposed method of addressing the comments. To facilitate the ministry's review and to support effective issue resolution, please submit responses to all ministry comments in table format, organized by reviewers.</p> <p>The ministry is available to meet with you to discuss any questions you may have and to support you in resolving any issues before the submission of the final EA. This approach is also recommended to address any outstanding comments from other government agencies in accordance with the ministry's EA Codes of Practice.</p> <p>The ministry requires copies of government agencies' comments (i.e., Ministry of Natural Resources and Toronto and Region Conservation Authority) on the draft EA, if any. The records should demonstrate what their comments are, how they are addressed, and confirmation that they have no additional comments on the EA.</p>	<p>Comment Noted.</p> <p>All MECP review comments and proponent responses have been summarized in table format and submitted to the ministry for review and feedback – with a view to confirming the ministry's acceptance of the proposed methods of addressing the ministry's comments prior to formal EA submission.</p> <p>Copies of all other government agency comments have been provided to MECP along with a table showing how these comments have been addressed.</p> <p>York Region will consult with interested parties about any proposed revisions to the draft EA report including offering to meet with Indigenous communities, and other interested parties. The final EA will include documentation of these activities as well as any changes that were made to the documentation to address comments.</p>	No further comments.

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		In advance of submitting the final EA, you may wish to consult interested persons about the revisions, as well as meetings with Indigenous communities, and other interested parties. The final EA should include documentation of those activities as well as any changes that were made to the documentation to address comments.		
MECP – Central Region Technical Support (October 7, 2024)				
1.	<p>Groundwater Comments</p> <ul style="list-style-type: none"> • Appendix K – Drainage and SWM Report • Appendix L – Hydrogeology Report • Appendix M – Contamination Overview Report • Appendix O – Soil Investigation Report 	<p>Excerpt from preamble (see attached letter for full text):</p> <p>The field methodology and data analysis described in the report are considered acceptable at this planning stage. The recommendations provided within the report are considered as applicable and should be implemented during detailed stages of the project design.</p> <p>Recommendations</p> <ol style="list-style-type: none"> 1. Detailed design stage of the project will need to further evaluate and minimize conflicts with landfill infrastructure and landfill monitoring systems and propose acceptable mitigation measures. Design for depth of construction excavations in support of underground infrastructure should carefully consider nearby landfill waste areas, infrastructure, and monitoring systems. 2. Further investigation of presence of landfill waste and landfill gas along the road alignment is required in close consultation with the landfill owners (City of Toronto, City of Vaughan, and private owner for Disposal Services Landfill) and MECP District Office. The landfill historical mapping, waste location records, landfill monitoring data (landfill gas and groundwater) needs to be 	<p>Comments Noted. See below for how each of these has been addressed. We have numbered the points in both the comment and response for clarity.</p> <ol style="list-style-type: none"> 1. This commitment has been included in Section 10.6.5 of the EA report. 2. This commitment has been included in Section 10.2 of the EA report. 3. This commitment has been included in Section 10.2 of the EA report. 4. This commitment has been included in Sections 10.2 and 10.6.5 of the EA report. 5. Mitigation measures to address this comment have included in Section 10.2 of the EA report. 6. The potential environmental effect has been recorded in Section 10.2 of the EA report along with a recommendation that YR adopt a Standard Operating Procedure (SOP) to address potential failure of landfill gas systems, and, a commitment to review this SOP with the landfill owners / operators and with MECP at the detail design stage of the project. 7. WSP’s 2024 Preliminary Foundation Report (Appendix R2 to the EA Report) states that “Construction of the bridge footings ... will take place within the engineered fill above the groundwater level and as such, dewatering is not expected to be required”. However, the 	No further comments.

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	<p>reviewed and considered during detailed design stage.</p> <p>3. The presence of landfill waste within the road ROW should be further investigated during the future geotechnical investigation.</p> <p>4. Contingency plans are recommended in the event of encountering landfill waste, landfill related infrastructure, impacted soils and gases during construction, especially near the Vaughan and Disposal Services landfills, where waste location details are not well known. A mitigation plan should also be developed, including notification of the landfill operator and control measures to minimize the exposure of construction workers.</p> <p>5. The presence of methane beneath the proposed roadway must be considered during design, and infrastructure for during- and post-construction mitigation of potential landfill gas exposure should be developed as part of the road design to insure safe conditions for the road users.</p> <p>6. The detailed road design needs to consider that, gas collection systems at the landfills are active and functioning, however the contingency measures should be incorporated in the design to account for the events of potential failure of the landfill gas collection systems and effects on road users.</p> <p>7. As noted by WSP (2024), groundwater dewatering associated with the proposed bridge construction across the valley east of Vaughan Landfill may influence the groundwater flow temporarily or permanently and could affect the movement of the chloride plume. Enhanced monitoring of the</p>	<p>Hydrogeology Report (Appendix L to the EA Report) states that “It is noted, however, that the design of the bridge is preliminary, and the actual depth of the spread footings is not finalized. It is prudent to consider that dewatering of silty sand and lowering of the water table by up to two metres may be required.” and “Detailed dewatering calculations to determine flow rate and radius of influence will be required during detailed design.” Further review of the possible need for enhanced compliance monitoring can be considered at detail design.</p> <p>8. Commitments have been included in Section 10.2 of the EA report to address infiltration concerns from storm drains.</p> <p>9. Please see above response to comment #7. Commitments have been included in Section 10.2 of the EA report to follow construction dewatering related permitting requirements.</p> <p>10. This commitment is included in Section 10.2 of the EA report.</p> <p>11. This commitment is included in Section 10.2 of the EA report.</p> <p>12. This commitment has been included in Section 10.2 of the EA report.</p> <p>13. This commitment has been included in Section 10.2 of the EA report.</p> <p>14. Section 11.4.1 of the EA report includes commitments to conduct EA compliance monitoring during the detail design and construction phase of the project. The need for long term monitoring will be determined at the detail design stage of the project.</p>	

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	<p>chloride plume in this area is recommended during and following construction.</p> <p>8. Location and design (depth) of stormwater management facilities and infrastructure will need to consider potential long-term effects on groundwater conditions and landfill related infrastructure, to minimize any potential impacts to existing plumes and monitoring activities at the landfills.</p> <p>9. Further assessment of potential impacts on groundwater levels near proposed deep excavation sections requiring dewatering will be required. Construction dewatering related permitting requirements should be followed as applicable (PTTW, EASR).</p> <p>10. As acknowledged by WSP (2024), a Phase Two ESA will be required across properties with PCAs before a Record of Site Condition (RSC) can be submitted for the Site. A Phase Two ESA is therefore recommended for Properties 1 & 2, 4, 5 and 8 which includes seven APEC.</p> <p>11. 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. Appropriate stormwater design measures for isolation of impacts resulting from road salt application should be implemented.</p> <p>12. Geotechnical investigation for the project needs to evaluate in detail the potential for during- and post-construction ground settlement as it relates to landfill waste areas, landfill cover and local groundwater conditions.</p>		

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		<p>13. Detailed geotechnical investigation should also include assessment of potential impacts of ground disturbance effects related to road construction on Keel Valley landfill leachate collection main that extends underneath the proposed road, as well as, on Teston Road Purge Well System and Vaughan/Keel landfill gas extraction and monitoring wells. The results of completed assessment should propose construction methods that will minimize the potential impacts and provide mitigative measures to be implemented during road construction.</p> <p>14. Final project design report will need to include detailed short- and long-term monitoring and mitigation plan related to landfill effects, groundwater resources impacts, landfill gas and ground settlement.</p>		
2.	<p>Surface Water</p> <ul style="list-style-type: none"> Draft IEA Report Appendix M – Drainage and Stormwater Management Report 	<p>In general, I concur with the recommendations provided in both reports. I offer the following comments for consideration:</p> <p>1. The IEA report asserts (p.241) that “due to the urban corridor, vegetative buffers, filter strips and enhanced swale along the corridor are not practical.” I do not agree with this statement. These LID methods have been developed in order to accommodate cases like this one and could be applied in areas not in close vicinity to the landfills. The cumulative impact of stormwater resulting from the road widening should be considered with higher emphasis placed on the protection of the environmental receivers.</p>	<p>These LIDs have not been proposed in this ROW for the preliminary design but can be explored in the detailed design stage. However, enhanced swales have been proposed at the sewer outlet.</p>	<p>No further comments.</p>
3.		<p>2. It is indicated in the SWM report (p.26) that “documentation is not available to verify whether the existing SWM facilities (within the subdivisions) have sufficient capacity to</p>	<p>Information was pending at time of previous submission. The report has been updated and further pond treatment capacity will be evaluated and verified during detailed design.</p>	<p>No further comments.</p>

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		service the future Teston Road widening”. Given that the existing stormwater management facilities have been built recently, documentation for them should be available. I recommend the proponents and their consultants do more to locate the needed documents and incorporate them in their evaluation of SWM for the project.		
4.		3. The MECP’s ‘Enhanced Water Quality Protection’ Level 1 should be applied to all stormwater management facilities. When a stand-alone SWM control cannot achieve Level 1 protection, a treatment train approach that includes vegetative buffers, bioswales, OGSs and/or infiltration trenches should be considered in suitable areas.	Comment noted. Table 16 suggests the treatment train approach for various outlets which may include an OGS system combined with other detention storage. Additionally, the existing ponds provides quantity and quality treatment of runoff originating from the Teston Road right-of-way.	No further comments.
5.	Air Quality <ul style="list-style-type: none"> Appendix H – Air Quality Assessment Report Sections 5.4.6 and 10.4.3 	According to Appendix M Contamination Overview Study Report prepared by Morrison Hershfield and dated October 27, 2022, the location of the proposed Teston Road extension is situated between three landfills where soil contamination may have occurred. Additionally, the Phase 1 Environmental Site Assessments (ESAs) identified several areas of potential environmental concern (APEC) in the study area that have the potential to emit contaminants of concern as a part of fugitive dust. Therefore, when soil excavation activities occur during the construction phase, the ministry recommends: <ol style="list-style-type: none"> when soil excavation activities occur during the construction phase, onsite ambient air monitoring takes place at the sensitive receptors identified in the AQA report for the site-specific contaminants identified within the APEC. The proponent should consider notifying the ministry’s York Durham District Office of any ambient air quality criteria exceedances of the contaminants of concern during the construction phase of this project. 	Comments Noted. These recommendations will be considered during the detail design phase.	Please add these recommendations to the final EA.

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		3. Where possible, reduce soil excavation activities and ensure that adequate dust mitigation measures are in place during forecasted windy conditions.		
6.		During the operation phase, the ministry concurs with the proposed mitigation measures of planting coniferous trees and shrubs, as noted in Section 5.0 of the AQA report. Further to this, the ministry suggests that the proponent consider vegetating near the identified worst-case sensitive receptors (Receptors 12, 14, 16, and 17) to further minimize off-site particulate impacts.	It should be noted that plantings in these areas have already been included in the design, as shown in Appendix B. Additional plantings in this area will be considered during the detail design phase, however, due to property and grading constraints, additional trees beyond what has been proposed may not be feasible.	No further comments.
7.		The ministry recommends that a complaint response protocol be prepared that outlines the measures that will be implemented when dust and/or odour complaints are received during the construction phase of the project and should include local district office notification.	Comment Noted. These recommendations will be considered during the design and construction phases of the project.	Please add these recommendations to the final EA.
MECP – York Durham District Office (September 26, 2024)				
1.	Section 5.4.3.1	Noting that Vaughan’s planning for the North Maple Regional Park has been ongoing for a number of years, and itself includes a number of agencies, permitting and other processes, a reference for the timing and park scope described in section 5.4.3.1 would be appreciated. It may be conservative to consider potential future parkland use and receptors in proximity to the roadway, but does not remove landfill considerations.	The City of Vaughan (via their NMRP consultant O2) has provided extensive comments as part of the draft report review on the park as it relates to this project. These comments have been included in this table. Additionally, we have added additional details to Section 5.4.3.1. as requested, based on these comments, available online information and in discussion with the City. Coordination between the City of Vaughan and York Region regarding this project will continue to occur during future phases of the project.	
2.	Section 5.6.12 and Appendix M (Contamination Overview Study)	Section 5.4.3.1 and Appendix M (Contamination Overview Study) discuss ‘Potentially Contaminating Activities’(PCA) and ‘Areas of Potential Environmental Concern’ (APEC) – both of which are defined terms in O.Reg 153/04 ‘Records of Site Condition’. The EA and appendix are not consistent with the use of these terms under O.Reg 153 or O.Reg 406, and have grouped many separate properties and activities into generalized PCA/APEC which significantly under represents the potential for	The COS was edited to define the road alignment (a line) and the study area (a 500 m offset from the line), to use the term PCAs as applicable, and to revise the use of term APEC. The COS was also edited to distinguish the individual PCAs in group 2. Section 5.6.2 of the EA Report has been modified accordingly.	

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IEA Comment Summary				
	IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 5, 2025)	
		impacts across the study area. Where a PCA like waste management is identified, this cannot be treated as a single APEC spanning waste management activities across nearly a dozen properties. Similarly, fuel storage PCA's would be specific to individual tanks and activities at each individual garage, gas station and other industrial activities and cannot be treated as a single APEC. This also applies to other broadly grouped PCA/APEC including chemical storage and manufacturing activities. As the assessment of potential contamination is intended to inform potential property acquisitions, construction considerations and soil use or reuse, refinement is required to ensure individual PCA are adequately evaluated and property specific APEC assessed.		
3.	Section 5.6.12.1	The approach to the Keele Valley Landfill Site (KVLS) does not appear to recognize the site as defined by the Environmental Compliance Approval (ECA). Several figures focus exclusively on the waste footprint and do not acknowledge the entire approved site including the primary and secondary buffer lands, also subject to the ECA and where landfill infrastructure, mitigation and contingency infrastructure is either currently operating or may be constructed in the future.	In the Hydrogeology Report and EA Report, Figures have been updated to show landfill areas, and primary and secondary buffers. ECA numbers have been included, along with much more discussion of the fact that the project can not in any way restrict post-closure operating and maintenance activities for these landfills, including any contingency measures that may be contemplated, during their contaminating lifespan.	
4.	Section 5.6.12.1	The reference to relevant legislation/instruments for the KVLS does not include the many notices of amendment, or separate storm water and air ECAs associated with the site. While the ministry is currently reviewing a request to consolidate the ECAs, the entirety of the approval should be considered, especially the December 20, 2006 Notice of Amendment #35 which incorporates the Closure Plan and long-term site maintenance, monitoring and management requirements. (section 11, Appendix references)	In the Hydrogeology Report, the text and figures have been significantly updated to include all the noted documents, and to address their requirements and implications. The EA Report has been modified accordingly.	
5.	Section 5.6.12	Section 5.6.12 indicates future discussions with Toronto will be used to determine landfill limits,	The text noted at left has been removed from Section 5.6.12.1 of the EA Report.	

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary				
	IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 5, 2025)	
		ECA applicability. The MECP's approvals are not subject to Toronto's interpretation of what is already defined in these permissions and future discussions should focus on assessing current and future landfill operations, monitoring and contingencies managed by Toronto within and adjacent to the proposed roadway.	EA Report Executive Summary and Section 11.3.5 Environmental Compliance Approvals have been modified to include a statement indicating that MECP concurrence will be required with any proposed changes to landfill infrastructure, operations, monitoring and contingencies associated with the construction of the Teston Road project.	
6.	Section 5.6.12.1	The reference to D series guidelines is not directly applicable to KVLS, but should be considered by the Region where they are proposing work in proximity to three closed landfills.	The text noted at left has been removed from Section 5.6.12.1 of the EA Report. A section on consideration of MECP's D-Series Guidelines on Land Use and Compatibility has been added to Appendix L - Hydrogeology Report and summarized in EA Report Section 11 – Future Commitments and in the EA Report Executive Summary. 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)), York Region commits to working with the landfill owners and MECP to reasonably mitigate and/or address any impacts or issues of concern.	
7.	Section 5.6.12.2	The reference to two chloride plumes appears to be an outdated reference to possibly a Vaughan Landfill Site (VLFS) reference. KVLS monitoring includes nine distinct plumes that have been historically identified, including those originating upgradient of the site non-landfill derived plumes at the site. Notably references in Appendix L for KVLS do not include the 2006 Closure Plan or any monitoring reports within the last 20 years. If this reference is intended to reflect only the KVLS purge well system and monitoring along the Teston right of way, that should be clarified and again supported with a reference.	In the Hydrogeology Report: Text has been updated to make it clearer about the number of plumes. Text has been updated to include reference to the 2006 Closure Plan which was reviewed. The impact assessment and recommended mitigation measures were updated accordingly. Section 5.6.12.2.1 of the EA Report has been modified accordingly.	
8.	Section 5.6.12.3	The discussion of the Disposal Services or Testonview Holdings landfill does not acknowledge the infrastructure associated with that landfill, notably relating to leachate and landfill gas. Again, there may be recent monitoring reports available to describe these operations and area conditions.	In the Hydrogeology Report and the Soil, Waste and Landfill Gas Report: Text and figures were updated to document the Disposal Services Landfill leachate collection system and the groundwater and gas monitoring systems. A summary of this information is included in Section 5.6.12.3 of the EA Report.	

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary				
	IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 5, 2025)	
9.	Section 5.6.12.3	The Testonview Holdings landfill is the subject of a Provincial Officer's Order, which pre-dates subsequent landfill ECA amendment and more recent monitoring and reporting. There has been no 'provincial offense' relating to this property (as described in Appendix L).	In Hydrogeology Report: Text was updated to remove the incorrect wording.	
10.		The IEA has divided the project into sections, and it should be clarified that while this may facilitate report organization, some road segment issues apply beyond the definition of that segment, i.e. landfill issues are present with the Testonview Holdings landfill in the Keele-Rodinea section and extend into the Valley crossing section to the east.	In the Hydrogeology Report and the Soil, Waste and Landfill Gas Report: The text and figures were updated to address this comment, and the scope and complexity of the impact assessment was expanded.	
11.	Appendix K (Drainage and Stormwater Management Report)	While section 10.6.1.5 of the IEA indicates stormwater management infrastructure should consider landfill gas migration, this is not reflected in Appendix K. Broadly, all subsurface utilities have the potential to act as preferential pathways for landfill gas (or potentially other contaminant vapours), and the KVLS ECA describes the requirements for collars and trench-plugs for utilities which may appropriate for future infrastructure in this area.	Appendix K has been amended to acknowledge the potential for landfill gas to be present within the Teston Road right-of-way and for subsurface utilities to have the potential to act as preferential pathways for landfill gas. A recommendation has been added to Appendix K that storm sewer systems must be designed so that they do not become preferential pathways for the migration of landfill gas and they must be protected from the ingress of landfill gas. Additional details are provided in Appendix O – Soil, Waste and Landfill Gas Report - and are summarized in the EA Report.	
12.		Under future commitments, ECA amendments are identified as a task for landfill owners. As has been raised at previous meetings, ownership of portions of landfill properties and responsibility for changes to any of the landfill operations should be discussed with the site owners as creation of the roadway is not currently related to any of the 3 landfill operations or long-term requirements.	Agreed.	
13.	Appendix L (Hydrogeology Report)	Hydrogeology has compared results of groundwater monitoring to Provincial Water Quality Objectives and York sewer-use criteria. While this may be relevant to dewatering and potential discharges, it should be clarified if groundwater quality evaluation will also serve other objectives. Notably, the IEA indicates Records of Site Condition may be	In Hydrogeology Report: Text updated accordingly: "In the event that property transfers are required, Record of Site Condition may also be required. The process for this typically starts with completion of a Phase One Environmental Site Assessment, and it is noted that seven of these were prepared as part of the EA for 8 specific parcels. Groundwater sampling carried out as part of the current assessment did not specifically address the	

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary				
	IEA Section Reference	Summary of Comment	Proponent Response – DRAFT (June 5, 2025)	
		required, and O.Reg 153 criteria, or potentially component values may be appropriate to apply to site contamination and where sensitive receptors are present.	APECs and PCAs identified in these reports. It will be the responsibility of the Qualified Person filing for RSC to ensure that groundwater is properly considered under that process.”	
14.		Sampling has focused on general chemistry, nutrients and metals and should be expanded to consider the potential contaminants of concern that relate to site specific PCA/APEC (i.e. landfill indicator parameters, fuels, or chemicals relating to specific industrial operations etc.). Again, the relevance of groundwater characterization to acquisitions, RSCs or in relation to specific receptors (i.e. subsurface workers, discharge to surface water etc.) may consider additional parameters.	In Hydrogeology Report: Text updated accordingly: “In the event that property transfers are required, Record of Site Condition may also be required. The process for this typically starts with completion of a Phase One Environmental Site Assessment, and it is noted that seven of these were prepared as part of the EA for 8 specific parcels. Groundwater sampling carried out as part of the current assessment did not specifically address the APECs and PCAs identified in these reports. It will be the responsibility of the Qualified Person filing for RSC to ensure that groundwater is properly considered under that process.”	
15.	Appendix O	Soil Investigation Report. This appendix and elsewhere in the IEA has selected site condition standards without clearly providing a rationale for the choice. The use of Table 1 in the vicinity of the KVLS may relate to Toronto’s historic approach to site cover quality, which considered the site’s proximity to environmentally sensitive features, and this would also be appropriate to consider in landfill to Dufferin road segment crossing the Don.	Text has been updated to address this comment.	
16.		The Region is reminded that the application of non-potable standards under both O.Reg 153 and O.Reg 406 requires notification to the Region under S.35 of O.Reg 153. This process does consider other groundwater use in the vicinity of the request and is described in the Region’s policy https://www.york.ca/business/land-development/non-potable-requests-brownfield-development	Section 11.3.7 Non-Potable Groundwater Requests has been added to the EA Report with a summary of this requirement including the link at the left to the York Region website.	
17.		Generally, very limited information has been reviewed in relation to the extensive landfill infrastructure present in the vicinity of the proposed alignment and while future studies are proposed to develop more detailed designs, this work must engage the landfill owners and	Significant modifications have been made to Appendix L – Hydrogeology Report and Appendix O which has been renamed as the “Soil, Waste and Landfill Gas Report” including details on landfill infrastructure, liners and capping, as well as potential impacts (to infrastructure, operations and compliance monitoring) and recommended	

**Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024)
York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA**

IEA Comment Summary				
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		ensure that the integrity of landfill operations, in addition to road and multi-use-path users, and future road workers is protected. Leachate and landfill gas infrastructure has been oversimplified in the IEA, and landfill liner and capping are also vital engineered components to the 3 landfills. More recent monitoring reports and approvals should be considered in evaluating the feasibility of specific infrastructure and operational changes.	mitigation measures. Figures showing the groundwater and leachate-related infrastructure have been improved in the Hydrogeology Report and those showing the landfill gas-related infrastructure have been improved and moved to the Soil, Waste and Landfill Gas report. Corresponding updates have been made to the EA Report.	
MECP – Species at Risk Branch (September 10, 2024)				
1.	General	Proponent may require some form of permission from the permissions branch. Client is aware that a separate submission specific to an Endangered Species Act review is required.	Comment Noted. The EA Report documents studies completed to date and includes a commitment to address Endangered Species Act permit requirements. Permitting, authorizations, etc., will be reviewed and addressed during the detail design phase.	No further comments.
Ministry of Environment Conservation and Parks (MECP) – Conservation and Source Protection Branch (September 3, 2024)				
1.		No further comments from a source protection perspective	N/A	
MECP – Climate Change Policy Branch (September 17, 2024)				
1.		No comments	N/A	
MECP – Adaption and Resilience Branch				
1.		No comments		

Harkness, Andrew

From: Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Sent: Wednesday, July 9, 2025 9:33 AM
To: Harkness, Andrew
Cc: Batista, Cindy (MECP)
Subject: FW: Draft EA Submission: Teston Road, #E0011-18

Good morning,

I'm sending this email on behalf of Cindy while she is away. This ministry's Senior Noise Engineer does not have additional comments. Please see below for your reference.

Thanks,

Wai

Wai Hadlari | Project Officer ([hear name](#))
Environmental Assessment Branch
Ministry of Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Fl, Toronto, ON, M4V 1P5
Email: Wai.Hadlari@Ontario.ca
Phone: 416-786-4944

From: Martella, Anthony (MECP) <Anthony.Martella@ontario.ca>
Sent: Monday, July 7, 2025 8:41 PM
To: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>; Hadlari, Wai (MECP) <Wai.Hadlari@Ontario.ca>
Cc: Hegazy, Sherif (MECP) <Sherif.Hegazy@ontario.ca>
Subject: RE: Draft EA Submission: Teston Road, #E0011-18

Good afternoon Cindy and Wai:

I have reviewed the noise/vibration-specific portions of the following documents related to the above noted EA file:

1. "Summary of Agency Comments on Draft CEA Report (August 2024 and December 2024) York Region - Teston Road Area Improvements (Keele Street to Bathurst Street) EA," comment response version prepared by the Region's project team, MS Word document dated June 5, 2025.
2. "Final Report (Final Draft) Comprehensive Environmental Assessment for the Teston Road Area Transportation Improvements," prepared by Morrison Hershfield Limited now Stantec, for York Region, dated April 2025.

3. "Environmental Noise Assessment Teston Road from Hwy 400 to Bathurst Street," prepared by SLR Consulting (Canada) Ltd., dated May 28, 2025 (Appendix G of the report listed in bullet point "2" above).

Based on the review of the relevant noise/vibration discussions in the above documents, there are no additional comments. Please let me know if you have any questions. Thank you.

Regards,

Anthony Martella, M.Eng., P.Eng.
Senior Noise Engineer

Approvals Services Section | Environmental Permissions Branch | Ministry of the Environment, Conservation and Parks

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Harkness, Andrew

From: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Sent: Friday, July 18, 2025 11:27 AM
To: Harkness, Andrew
Cc: Cheung, Billy; MacMillan, Meghan; Batista, Cindy (MECP)
Subject: FW: Teston Road Draft EA - Proponent responses

Good morning, Andrew.

Please see Andrea's email below from the ministry's York-Durham district office regarding the comment/response table – there are no further comments on the draft EA from this office, at this time.

I do have an additional comment regarding cumulative effects as well as a few minor editorial comments, as follows:

The Teston Rd ToR, section 4.3 says: Climate change and cumulative effects will be integrated into the assessment of alternatives and the IEA will evaluate the advantages and disadvantages to the environment of the proposed undertaking and the alternative methods based on net effects.

The draft EA should include a discussion regarding cumulative effects from existing, planned and reasonable foreseeable projects and activities within the study areas based on the preferred alternative for the project. Please add a section that speaks to cumulative effects in the EA.

The following are minor editorial comments:

- Executive Summary:
 - Executive Summary - Page III: Consultation (Section 3), first paragraph: suggest adding Indigenous communities when listing who was part of the consultation program.
 - Page 2, 1.3 - Project Background: there is still reference to the ministry's old name 'Ministry of the Environment'. Please update accordingly.
 - Page 7, Figure 2-1: title still refers to the word 'Individual' in the title. Please revise with the word 'comprehensive' instead.

Can you kindly give me an update on the status of other agencies comments on the draft EA? Is the proponent still working on addressing them? Are they all resolved? Is the proponent still targeting EA formal submission for late August or September?

Let me know if a meeting would be more beneficial to discuss my questions above.

Regards,

Cindy

From: Brown, Andrea (MECP) <Andrea.J.Brown@ontario.ca>
Sent: Thursday, July 17, 2025 6:49 PM
To: Batista, Cindy (MECP) <Cindy.Batista@ontario.ca>
Cc: Dugas, Celeste (MECP) <Celeste.Dugas@ontario.ca>; Batten, Steve (MECP) <Steve.Batten@ontario.ca>
Subject: RE: Teston Road Draft EA - Proponent responses

Hi Cindy, I've reviewed the responses provided by the Region and am satisfied with the responses provided (noting that much of the detailed work is deferred to future technical studies).

Andrea

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