Under Objectives:

Comment:

Could the study include off-site contributions/benefits as a result of maintaining the health of the park? Nature is dynamic and not restricted to artificial boundaries laid out by humans. By maintaining a healthy urban park benefits beyond the boundaries could include healthy organism populations, improvement in air and water quality, cooling effects, carbon capture, reduction in pollutants through plant uptake, downstream food sources for fishes, insectivores and others.

Should the objectives include the cumulative impact to food security for Canadians from the removal/reduction of prime non-renewable farmland and the precedent this will set for development pressures to remove additional prime farmland. This could be exacerbated by the impact to farms from the construction of highways including 413 and Bradford Bypass. Or is consideration being given to this through other avenues?

Under conditions 3.3 and 5.1

Comment:

It would be useful to reach out to citizen science groups such as inaturalist, ebird and local interest groups including but not limited to:
Environmental Defence:
https://environmentaldefence.ca/report/developing-disaster-species-at-risk-in-drap/
that has identified that the following concerns:
Threatening 49 species of birds protected under the Migratory Birds Convention Act
Polluting 14 fish-bearing stream tributaries, seven of which support cold water benthic (stream-bed) communities
Paving over up to 400 hectares of forest and a wetland in a headwater zone
Compromising the ecological integrity of the nearby Rouge National Urban Park
https://environmentaldefence.ca/wp-content/uploads/2023/04/Species-and-Ecosystems-at-Risk-in-the-Duffins-Rouge-Agricultural-Preserve-Considerations-for-a-Federal-Cumulative-Effects-Study.pdf
https://environmentaldefence.ca/wp-content/uploads/2023/04/Developing-Disaster-Species-and-Ecosystems-at-Risk-in-the-Duffins-Rouge-Agricultural-Preserve.pdf
Carolinian Canada:
https://caroliniancanada.ca/legacy/ConservationPrograms_BigPicture.htm
Birds Canada Avibase - Bird Checklists of the World
https://avibase.bsc-eoc.org/checklist.jsp?region=CAonnpro
Friends of Rouge National Urban Park
https://rougenationalnow.com/category/birds/

Under the TofR section

the Identification of valued components must include:

- ii) The ability to maintain and restore the ecological integrity of the park.

Comment: This statement should include the word enhance.

- iii) including magnitude of effects and how these would be managed through existing legislative and regulatory mechanisms

Analyses of potential effects on valued components must:

- vi. Where appropriate, predict the impact of development activity scenarios on valued components.
- viii. Where appropriate, describe the magnitude of potential impacts, including any uncertainty.

- x) Where appropriate, describe any relevant avoidance, mitigation or compensation measures, which may address potential adverse effects.

Comment:

Do mitigative measures ever adequately abate alteration/destruction of the natural environment? Do not provide "pay to slay" mitigative measures.

As per Environmental Defence, the DRAP is "4,700 acres of mainly class 1 farmland interwoven with rare Carolinian habitat on agricultural soil". The Ontario Federation of Agriculture indicates "Ontario is losing 319 acres of farmland a day. This rate will leave us no prime farmland in 100 years." "Besides food production, farmland provides an expansive list of environmental benefits including oxygen production, carbon sequestration, climate regulation, biodiversity, pollination services, soil erosion control, water and nutrient cycling, and habitat for wildlife and endangered species." Farmland is a finite and non-renewable resource. To pave over the DRAP will not only impact the food security of Ontario residents, it will have a cumulative impact on Canadians. Off-site assessment needs to be considered as it relates to food security for all Canadians. This could have dire adverse effects for many considering the current pressures faced around food security.

- Where appropriate, describe any relevant monitoring and follow-up program.

Comment:

What are the consequences if monitoring, follow-up program indicates an adverse effect, impact to the park? If development occurs, the damage is done and development cannot be undone to address the adverse effect, of which there could be many including salt contamination, stormwater runoff including oils, greases, heavy metals, pesticides, fertilizers, plastics (plasticosis) animal wastes and more.

https://www.unep.org/resources/report/chemicals-plastics-technical-report

Recommend whether actions by the Government of Canada, notably under the Rouge National Urban Park Act, the Impact Assessment Act, the Species at Risk Act, the Migratory Birds Convention Act, 1994 and the Fisheries Act should be applied to future proposed development activities, and under what circumstances.

Comment:

Any possible development adjacent to the park needs to include window treatments to prevent bird collisions as "The (Ontario) law is now clear that emitting reflected light that kills birds is an offence under the EPA. This is good news for the thousands of birds that die in window collisions in Toronto each year. The Ontario Ministry of Environment must regulate (under s. 9 of the EPA) such buildings, given they are discharging a contaminant that is killing birds."

"And this is also why it's a real victory for migratory birds: The law has now been interpreted – for the very first time – to make clear that it applies to reflected light and therefore protects birds from window strikes." Section 32 of SARA should be harmonized with this decision.

https://ecojustice.ca/news/how-losing-in-court-is-still-a-win-for-migratory-birds/

Annex 1: Available sources of information or analyses may include but are not limited to:

Comment:

In addition to hydrology, hydrogeological conditions need to be considered since groundwater is vital to recharging surface waters. Cold water streams are vital to the health of fish species and plants. Groundwater discharge areas are important for riparian vegetation dynamics. How will drainage from potential stormwater management from development impact fisheries, water quality, benthic invertebrates and other organisms consuming and living in the area or using it as stop-overs?