

June 20, 2023

CFN 69045

BY E-MAIL ONLY (parkstudy-etudeparc@iaac-aeic.gc.ca.)

Rouge National Urban Park Study
Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street
Ottawa, Ontario K1A 0H3

**Re: Draft Terms of Reference
Rouge National Urban Park Study
Impact Assessment Agency of Canada**

These comments respond to the draft Terms of Reference (TOR) for the Rouge National Urban Park Study (Study) posted for public review on May 30, 2023.

OVERVIEW

Staff understand that the Study will look at the potential effects of development projects adjacent to the Rouge National Urban Park. The goal is to understand the potential effects, including cumulative effects, of past, ongoing, and potential future nearby development projects on the integrity of the Rouge National Urban Park and its management objectives. The Study will include a description of existing conditions, description of potential development activities, identification of information and knowledge gaps or uncertainties, analyses of potential effects, identification of valued components and analyses of potential effects on valued components.

The Study will also provide conclusions and recommendations such as whether avoidance, mitigation and compensation measures can address potential impacts of development activities, and whether additional monitoring and follow-up measures would be warranted. The study would also 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.

On March 21, 2023, the Minister of Environment and Climate Change requested that the Impact Assessment Agency of Canada work with Parks Canada and Environment and Climate Change Canada to develop the proposed approach and scope for how the Study would be undertaken. At this time, the Impact Assessment Agency of Canada has invited the public and Indigenous groups to review the draft Terms of Reference (TOR) for the Study and provide comments.

TRCA REVIEW

TRCA staff met with the Study team on May 25, 2023 and provided preliminary comments on the draft TOR in correspondence dated May 29, 2023. It was noted that the draft TOR aligns well with the data/science, processes, partnerships, and mechanisms in place for watershed/subwatershed planning at TRCA and there is potential to increase defensibility, avoid duplication, and maximize efficiency and effectiveness. TRCA has also identified many opportunities where TRCA can support the Study including undertaking analysis and identifying recommendations within the larger planning and ecosystem management context.

Staff have completed the review of draft TOR posted for public and indigenous groups review on May 30, 2023 and comments are attached in Appendix A: TRCA Comments on the Draft Terms of Reference.

We look forward to working with you during future stages of the study. Should you have any questions, please contact me at <personal information removed> or at suzanne.bevan@trca.ca.

Regards,

<original signed by>


Suzanne Bevan
Senior Manager
Development and Engineering Services

Attached: A: TRCA Comments and Proponent Responses on the Draft Terms of Reference

BY E-MAIL

cc: Veronique Boucher Lalonde, Impact Assessment Agency of Canada
(Veronique.BoucherLalonde@iaac-aeic.gc.ca)

APPENDIX A: TRCA COMMENTS ON THE DRAFT TERMS OF REFERENCE

ITEM	TRCA COMMENTS (June 20, 2023)
1.	<p>Section 5.1 (f) related to Description of Potential Development Activities.</p> <p>Please note that the Province recently rescinded the Central Pickering Development Plan (CPDP) which provided the basis for a robust natural heritage system (NHS) in Seaton, east of the West Duffins Creek.</p> <p>The City of Pickering adopted  OPA 22 to implement the CPDP, which also identified the NHS and implemented the protective policies in the CPDP. However, in the absence of the CPDP and potential amended Provincial Policy Statement(s), the ultimate protection and enhancement of the Seaton NHS could be at risk, with areas potentially being deemed suitable for development in the future.</p> <p>The City of Pickering is currently engaging the public in discussions on the review of its Zoning By-law. The current draft of that by-law rezones the Seaton NHS to “Agriculture” which opens up the NHS, while Provincially owned, to further impacts from uses allowed within the Agricultural Zone.</p> <p>The project team and committee may wish to consider including the Seaton lands as part of the analysis, especially as it relates to ecological connectivity between the RNUP, DRAP and the Seaton NHS lands, cumulative impacts that may result, as well as protections that may be offered by alternative land ownership and new commitments to stewardship. This Seaton NHS Management Plan commissioned by the Province but never implemented may be useful.</p> <p>TRCA has been collecting environmental data from the Seaton lands for several years as part of a large monitoring program. Some of this data could be useful in evaluating impacts and study recommendations.</p>
2.	<p>Section 5.0 and Annex I</p> <p>Annex I in the draft TOR, lists potential valued components on which the Committee may choose to request specialist or expert information, knowledge, analysis, or advice with respect to the Study from federal authorities, or any person or body in possession of such information or knowledge. It is understood that Annex I is provided as guidance to the Committee on potential valued components and known sources of information and knowledge available. TRCA is listed as an available source of information or analysis for several components. The following is provided for consideration.</p> <ul style="list-style-type: none"> a) The review of impacts on structural connectivity should be undertaken at the scale of development proposed in and adjacent to RNUP. Specifically, landscape connectivity across the entire Duffins Rouge Agricultural Preserve should be reviewed in detail. The existing structural and functional linkages between RNUP and the Duffins Creek valley would be impacted significantly by development in the area. b) Please ensure the review of Wetlands and Fish and Fish Habitat include headwater features, small wetlands and indirect fish habitat as these are prevalent on the landscape.

	<ul style="list-style-type: none">c) Potential impacts to natural hazards ex. coastal, erosion, fluvial, geotechnical hazard strategies should be considered/evaluated.d) Please note that the Oak Ridges Moraine Groundwater Program will be a valuable source of information for this undertaking. Steve Holysh and Rick Gerber are the co-managers of this program, and can make the collective wisdom of the program available to the study team.
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