

April 20, 2021

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To the Honourable Jonathan Wilkinson,  
Minister of Environment and Climate Change

CC:

The Honourable Julie Dabrusin,  
Member of Parliament, Toronto-Danforth  
Peter Tabuns  
MPP, Toronto-Danforth  
Paula Fletcher  
City of Toronto Councillor

I am requesting a regional assessment under the Impact Assessment Act for the area of the Federal riding of Toronto Danforth including lands on the west side of the Don River, from the mouth of the Don in the south up to about Pottery road to the north.

This area contains multiple large transit projects in addition to important climate change projects that have positive and negative impacts on the environmentally sensitive Toronto's Ravine system and lands within the flood zones of the Don River. These projects include the Province of Ontario's "Big Move" expansion of regional rail, the Ontario Line and Via Rail's High Frequency Rail proposal. Climate change projects include the City of Toronto's Ravine Strategy, its Tree Canopy and Waterfront Shoreline Project and the Toronto Regional Conservation Authority's Ravine Erosion Risk Management and Hazard Mitigation Project. All of these projects include Federal funding to some extent such as the \$1.5 Billion provided by the Ministry of Infrastructure Canada through the Public Transit Infrastructure Fund.

A regional assessment is required because the cumulative impact of these projects is unknown. Not only is the cumulative impact missing but some components of the projects have provided inaccurate data, misleading forecasts and omitted outcomes.

Metrolinx's Big Move proposes the expansion of diesel locomotive powered regional rail service, resulting in their proposal to build a Maintenance Service Facility and train parking lot in the Don Valley. Access to this facility by road and rail sit within the 100-year flood zone. Metrolinx acknowledges the problems of the area:

"The 2015 GO RER Initial Business Case... identified issues that should be addressed before deciding on a development strategy for the [Richmond Hill] corridor.

Technical challenges include:

- Flooding in the lower Don River, which affects most of the corridor from Richmond Street to the Millwood Bridge”<sup>1</sup>

Further the climate change benefits of the Big Move, as calculated by Metrolinx, are highly suspect. Of the \$42.2 Billion of total project benefit, reduction in Green House Gases represent a mere 0.78% of the total (\$330 million). However, this \$330 million forecast is based on shifting 145,000 cars off the road on rails in 2055. The likelihood is that cars in 2055 are electric while many of Metrolinx’s trains will continue to be diesel. Metrolinx also provides stats showing a drop in the average GHG emissions per passenger from 1.85kg to .5kg per trip. While the absolute increase in the amount of GHG emissions generated by Metrolinx is known, the number of riders over the next 35 year is a variable forecast. One only need to look at Metrolinx’s current ridership and their vague assessment of the impact of “work from home” to see the problem with forecasted reductions in average GHG emissions per rider. In an assessment of Metrolinx’s proposal to build and access an MSF in the environmentally sensitive Don Valley we may find additional negative environmental impacts such as moving commuters from electric vehicles to diesel trains, commitment to running scheduled diesel trains regardless of traffic load and broad impact of converting previously agricultural land to low density development for commuters.

The area requested for assessment contains one of Canada’s first professional archaeological excavations. The nearby Withrow site is about 4000 years old and is connected to 11,000 year old Wendat Trail which is sited where Metrolinx’s CP Don Branch crosses the Don River. The area is included in Federal Government’s 2011 settlement with the Mississaugas of the New Credit First Nation. This settlement aimed to reconcile the botched Toronto Purchase of 1787 and later agreement in 1805 however to this date Indigenous history in Toronto remains underrepresented and at risk from new development. None of the official City of Toronto or Provincial museums none are dedicated to the period of time predating 1790. It is my opinion that the social and economic conditions of descendants of the First Nations mentioned in land acknowledgments would be wisely served if, within the scope of this regional assessment, the land being proposed for the access to, service and storage of diesel trains, was considered by the Federal Government to further its reconciliation efforts, its initiatives to support tourism while also working towards reductions in GHGs.

I appreciate your attention to this matter in hopes of discussing further.

Chris Williams

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<sup>1</sup> Metrolinx GO Expansion Full Business Case, 2018