

November 8, 2024

To: Permissions Modernization Team
Client Services and Permissions Branch
Ministry of Environment, Conservation and Parks (MECP)

Re: Proposed regulatory amendments to streamline the approvals process for alterations to municipally owned sewage and water distribution works that are part of transit projects (ERO # 019-8728)

The City of Toronto, Toronto Water Division, appreciates the opportunity to comment on the proposed amendments to Regulations 208/19 and 172/03. Toronto Water's staff have provided their response to the discussion questions below.

Toronto Water **is supportive** of the proposed amendments to O. Reg. 208/19 and O. Reg. 172/03 to include transit authorities as Prescribed Persons. This amendment will better facilitate the review by the City and approval of alterations to municipal sewage or water distribution works that are undertaken as part of transit projects in a timely manner. This would be a benefit to the City as well as the transit authority and the general public. For further clarity, the City recommends the inclusion of the following transit authorities within the definition of transit authorities:

- Metrolinx
- Toronto Transit Commission (TTC)

Discussion questions

Are there other entities that construct or alter sewage or water distribution works that will eventually be transferred to municipal ownership that the ministry should consider designating a prescribed person under O.Reg. 208/19 and defining water distribution works that these entities construct as part of a municipal drinking water system under O.Reg. 172/03?

Are there other types of authorities, other than transit authorities, that the ministry should consider including in these proposed amendments?

Based on past Transfer of Review applications administered by Toronto Water, the following entities have constructed or altered sewage or water distribution works that eventually became transferred to the City's ownership. Accordingly, we recommend that the following entities be considered within the definition of Prescribed Persons as it would facilitate the timely review and approval of alterations related to projects undertaken by these entities which benefits all parties involved:

- Government ministries or agencies, such as
 - Ministry of Transportation
 - PortsToronto
- School boards, such as
 - Toronto Catholic School Board
 - Toronto District School Board
- Government corporations, such as
 - Toronto Community Housing Corporation
 - Waterfront Toronto Corporation
- Utility companies, such as
 - Toronto Hydro
 - Hydro One
 - Enbridge
 - Telecommunication Companies, etc.

Toronto Water staff are overall supportive of the proposed regulatory amendments but ask the MECP to consider the comments provided herein when drafting the changes.

If you have any questions or require more information, please contact me at shad.hussain@toronto.ca.

Regards,



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