

Please see the following comments from the Town of East Gwillimbury relating to the updated proposal for the Environmental Assessment Modernization. Using the provided Discussion Questions, we are providing comments for 1. Indigenous Engagement and 3. Planning processes.

1. Indigenous Engagement

- We use the term “Indigenous engagement” to refer to informal feedback gathering on issues that do not invoke the legal context of land rights holders.
- Where there is a legal requirement for feedback gathering, we use the term “Indigenous consultation”
- We have contact with all seven of the Williams Treaties First Nations through each First Nation’s Consultation Manager.
- We email them early in the process to request consultation on any new projects which require Indigenous land rights holders to have input, often using the First Nation’s templates for submitting a request for consultation.
- The process starts by paying the filing fee for a consultation process to each First Nation.
- Sometimes First Nations will provide feedback via email, or they will opt for a virtual meeting with us. In-person consultation meetings have occurred but are rare.
- If we do not hear back, we send several follow ups, documenting our communications.
- We endeavour to give ample time for response and review of documents to ensure Indigenous communities do not feel rushed, and ensuring sensitivity to historical instances when very short timelines were provided. (e.g. in the case of the Williams Treaties ‘negotiations’). We try to give at least 60-90 days for response and are flexible, offering to adjust timelines to the First Nations’ availability when possible.
- Some governing bodies do request that we consult additional Indigenous communities and/or organizations beyond the Williams Treaties First Nations for

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specific projects. When this is requested we do complete the expanded consultation. It would be helpful to have a deeper understanding of when/why these more expanded consultations should take place for particular scopes of work.

- Sometimes consultation is led by the Town's Accessibility, Indigeneity and Equity Coordinator, or it will be led by the staff leading a specific project.
- Rather than invite First Nations to a general Town feedback session, recognizing their position as land rights holders, we meet with each First Nation individually, with the FN's Consultation Manager, relevant Town staff, and Town consultants joining. Respecting each First Nation's sovereignty, we also do not meet with more than one First Nation at a time, unless they were to request this.
- We are looking to develop processes to better engage urban Indigenous Peoples in engagement and feedback processes, and plan to have a draft Indigenous Consultation Policy by March 2026.
- Going beyond compliance, we do work on relationship building with the seven WFTN, with a focus on the First Nation that is closest to our Town: the GIFN. For example, we have installed the GIFN's flag in our Council chambers permanently.
- We completed an Indigenous Engagement and Consultation training with ICT. (Indigenous Corporate Training Inc.)
- We endeavour to meaningfully accommodate First Nation's feedback, unless doing so is not feasible.
- We aim to adhere to UNDRIP principles, although we do not yet have an official Town commitment stating as such.

3. Planning Processes:

When reviewing "Table 1: Projects proposed to be subject to the Archaeological Assessment Process", please consider the following changes to improve clarity for municipalities.

- Project Types #3 & 6 include reconstruction examples that would benefit from adding the words “outside of the previously disturbed portion of an existing right-of-way”, similar to Project Type #4. Project Types #8 & 9 are also reconstruction examples, however as those relate to water crossings, they can remain as is given their higher potential for archaeological significance.
- If the comment in the bullet above is not incorporated into the EA changes, consider adding wording to Project Types #3 & 6, to exempt road reconstructions that have minor/operational widening objectives. For example, widening shoulders or widening lanes while still maintaining the same number of lanes, purpose, use and capacity. Under the current proposal, these examples are not ‘at the same location’ as they widen each side of the road (ie. by 0.3 to 1.0m on average).