

**C18
Communication**

Council – September 24, 2024

CW(2) – Report No. 30 Item No. 4

From: Clerks@vaughan.ca
To: [Adelina Bellisario](mailto:Adelina.Bellisario)
Subject: FW: [External] Block 41, Parks on the Greenbelt
Date: September-23-24 11:56:42 AM
Attachments: [Block 41 Sept 17, 2024, Agenda Item 6\(4\) - Google Docs.pdf](#)

From: IRENE FORD [REDACTED]
Sent: Monday, September 23, 2024 11:05 AM
To: Clerks@vaughan.ca

Cc: Oico On Info <info@oico.on.ca>; Comments <comments@auditor.on.ca>; Council@vaughan.ca; Greenbelt Consultation (MMAH) <greenbeltconsultation@ontario.ca>; Paul Calandra <paul.calandra@pc.ola.org>; doug.fordco@pc.ola.org; Dfo Mpo Gc Info <info@dfo-mpo.gc.ca>; Environmental Permissions (MECP) <enviropemissions@ontario.ca>; Marit Stiles-QP <mstiles-qp@ndp.on.ca>; Mike Schreiner <mschreiner@ola.org>; John Fraser-CO <jfraser.mpp.co@liberal.ola.org>
Subject: [External] Block 41, Parks on the Greenbelt

CAUTION! This is an external email. Verify the sender's email address and carefully examine any links or attachments before clicking. If you believe this may be a phishing email, please use the Phish Alert Button.

Please find attached my letter for inclusion on Council's Agenda with Regard to Sept 17, 2024 Committee of Adjustment Agenda Item 6(4).

In my opinion the Block Plan, while not a statutory requirements, is not in compliance with the Greenbelt Plan, Vaughan's in effect 2010 Official Plan nor the Secondary Plan for Block 41. ROPA7 was never approved by the Minister so staff's application of these policies are flawed.

I found the response to Councillor lafrate's questions concerning. Any questions surrounding monitoring for redbelt dace habitat should be answered by the MECP, DFO who are responsible for compliance with endangered species legislation. The response given was in reference to meeting the City's stormwater discharge requirements these are very different things. It is completely unclear if anyone has reviewed this Block Plan for compliance with endangered species legislation or natural heritage protection. Is redbelt dace habitat being destroyed, will endangered species benefit permits need to be issued (as occurred in Block 34E)?

Please note in the coming days I will send formal letters requesting the Ontario Ombudsman requesting investigations into the approval process and that the Auditor General Consider the Greenbelt lands downgraded upon approval of York Region's Official Plan, 2022 as a Greenbelt Removal/Resignation. Unfortunately, these Greenbelt redesignations were not included in the scope of the Auditor General's report which was focused on the Greenbelt Removals and 2 land use designations that were approved by the Province through an Order in Council, approved as Amendment No. 3 to the Greenbelt Plan. I believe had this decision been recognized by the Auditor General that it might have been considered a Greenbelt Removal. There is also a similar decision in Peel Region's Official Plan which downgraded significant amounts of Greenbelt from agricultural to rural. These lands are intentional designated agriculture in Official Plans to ensure they were protected permanently refer to Section 1.4.1(2).

The pressure on Ontario's Water Resource System through the downgrading of Ontario's natural heritage system must be understood. Especially because it benefits the same few

landowners that have exerted unreasonable influence in the land-use decision making process at multiple levels of government and the stories continue to come out.

I will be asking the Ombudsman to investigate because the Vaughan Official Plan nor Secondary Plan were approved with parks or stormwater on the Greenbelt, the suggestion that ROPA7 is in effect and applies when it was not endorsed by Vaughan Council, nor approved by the Minister in the staff report and the lack of clarity about what was approved by the OLT Order upon approval of the Secondary Plan in August, 2021. Further there is an ongoing appeal regarding by-law 001-2021 specific to the Block 41 Greenbelt for which staff have not referenced in the staff report, nor appear aware. Are they appealing what is represented in the Block Plan or seeking further permissions. If the latter they are once again not transparent in what the true plans are for Block 41.

- F. To determine if an area-specific appeal includes an appeal of New Section 1.6, refer to the "Subject of Appeal" for the respective appeal in this Appeal Index Reference Table and Attachment "B" to the decision of the Tribunal arising from the June 9, 2022 Case Management Conference in OLT Case Nos. OLT-22-002104 and OLT-22-003554.

Appeal Index Reference Legend	
Appeal Index Reference	Description
1	Site-specific appeal of entire ZBL, with appeal of By-law 039-2022
1A	Site-specific appeal of entire ZBL, no appeal of By-law 039-2022
2A	Area-specific appeal: Vaughan Metropolitan Centre (" VMC ") Secondary Plan Area, as shown on the map attached as Schedule D
2B	Area-specific appeal: Yonge Steeles Corridor Secondary Plan (" YSCSP ") Area, as shown on the map attached as Schedule E
2C	Area-specific appeal: Lands within 300 m of the MacMillan Yard, as shown on the map attached as Schedule F
2D	Area-specific appeal: Numerous lands on Keele Street (Employment Area Triangle), as shown on the map attached as Schedule G
2E	Area-specific appeal: Greenbelt Fingers within Block 41, as shown on the map attached as Schedule H
2F	City-wide appeal: Greenpark Homes & Intergreen Developments

Regards,
Irene Ford

City of Vaughan Sept 17, 2024, Agenda Item 6(4)

BLOCK 41 LANDOWNERS GROUP APPLICATION FOR BLOCK PLAN APPROVAL
BLOCK 41 BLOCK PLAN FILE BL.41.2020¹

This communication will fall on deaf ears.

Vaughan Council is not forced to make this decision, the Minister quite explicitly gave you the tools to approve or not approve parks on the Greenbelt in York Region's Official Plan, 2022. Regardless, I am of the opinion that the Ontario PC Government is breaking their promise to the people of Ontario to protect and uphold the Greenbelt. Vaughan Council is letting them by saying and doing nothing. It is a precedent setting decision and one that will be used to justify urban uses supporting settlement areas into the protected countryside of the Greenbelt.

Block 41 is a lesson about who is and who isn't listened to. It demonstrates that no one is getting paid to lobby for, or to protect: the Greenbelt, our water resource system, our natural heritage system, agricultural system or cultural heritage. Far too many people are getting paid to make sure they are not protected anymore and those costs will be transferred onto the price of housing and won't make housing more affordable.

Block 41 has a controversial planning history with direct political interference from:

- multiple motions presented by Regional Councillor Jackson,
- a MZO request brought forward by the former Mayor as an addendum to a Council meeting that was not reviewed by legal or planning staff prior to Council endorsement - *approved without parks on the Greenbelt* -,
- an OLT hearing permitted after the MZO - *approved without parks on the Greenbelt*,
- policies forced into YROP through the landowners private request - Regional Official Plan Amendment No. 7 (ROPA7) - which was never formally approved by the Minister, and,
- YROP policies to downgrade the Greenbelt adopted verbatim then later reversed by Bills 150 and 162 (the Greenbelt was still downgraded even with the reversal)

Staff suggest in the Block 41 Block Plan staff report that ROPA7 was endorsed by Council when it was not, it was received and no action was taken. If the Minister didn't approve ROPA7 I fail to understand how staff can say that it's policies apply to our Official Plan or Secondary Plan; ROPA7 has no legal validity. The MZO has no authority

¹Block 41 Block Plan Agenda, Sept 17, 2024 Link:

<https://pub-vaughan.escrimemeetings.com/Meeting.aspx?Id=d0eaf46e-48f7-426a-98c8-c535ff8d5d7e&Agenda=Agenda&lang=English&Item=26&Tab=attachments>

in the Greenbelt. The Greenbelt removal was reversed. The only policies that apply are those in York Region's Official Plan, 2022 and even here they are convoluted.

These lands have witnessed excessive special treatment; they have been included in two Auditor General Reports, an Integrity Commissioner Report and helped launch an RCMP investigation into the provincial government on the Greenbelt Removals. **Block 41 has literally managed to prepay to ensure finite service allocation is held for greenfield development that is probably still decades out - in an housing crisis²** as a benefiting landowner of in York Region's Block 27 prepaid development charges agreement.

There is a lot I don't get.

- How did the landowner invest millions and install water and wastewater infrastructure 10 to 15 years ago, as indicated in their own MZO request, when at the time the area was not within the urban boundary and had no secondary plan?
- How could the appeal proceed when MZO's are not allowed to be approved? Did the Minister grant special permission, again for this landowner?
- How can Mr Given, of Malone Given Parsons, at the 2021 OLT Tribunal hearing give his expert opinion that the Secondary Plan is consistent and/or in conformity with the PPS, 2020, Growth Plan, 2019, Greenbelt Plan, 2017 and YROP, 2010 (refer to paragraphs 15, 17, 21, 19) when he fully knew the MZO had been approved in 2020 and would blow up conformity with everything except the Greenbelt Plan?
- How can we consider the parks and stormwater management infrastructure to separate from the settlement area, in the absence of the development they would not proceed?
- How can the Block Plan be compliant with policy 3.4.2 in the Greenbelt Plan, which states that ***"Settlement areas outside the Greenbelt are not permitted to expand into the Greenbelt."***?
- TRCA is limited to commenting on natural hazards. York Region has been forced into silence as a result of the removal of planning responsibilities. Who, independent of the landowners paid staff and qualified, reviewed and commented to ensure conformity with regard to the NHS and key hydrologic area policies?
- Block 41's Greenbelt contains Ecological Significant Groundwater Recharge Areas (ESGRA) - lights up purple in Map 12B of YROP³, how is the applicant compliant with the Greenbelt Plan's Natural System policies in Section 3.2?

² York Region Staff Report, June 11, 2020 entitled: Prepaid Development Charge Credit Agreement with the Block 27 Developer Group in the City of Vaughan:

³ <https://storymaps.arcgis.com/collections/8a1198ece3d941c9ae4d9a9cb4cb2f41?item=17>

- Why should we trust consultants whose opinions change depending on who is paying? For example, in 2016 Savanta assisted the MNR to incorporate 9 provincially significant wetlands in Block 34E. In 2019 when hired by Block 34E landowners they requested 3 of the 9 PSW not remain PSW⁴.
- How could Blocks 40/47 to the south have approved infrastructure built to connect and service Block 41 when York Region had not yet completed an EA to determine how these areas should be serviced, North East Vaughan Water and Wastewater EA was only completed and approved in 2019⁵? Did we build Ontario's longest elevated pedestrian bridge, doubling as a utilities corridor over Purplecreek when we should have been waiting for York Region to build and deliver a trunk sewer? How much additional cost is being added that will be paid by the homeowner as a result of an interim servicing plan and permanent servicing plan? Is the homeowner paying twice for servicing?⁶
 - Block 41 is a benefiting landowner of York Region's Block 27 prepaid servicing agreement that is holding servicing capacity for about 10,000 households⁷.
 - The agreement requires \$156.4M security to finance infrastructure, \$4M of which is not recoverable and they can recoup costs starting in 2028 over 5 years, if over 90% of the benefiting blocks are registered⁸
 - In Oct, 2020 the City of Vaughan approved an Interim Servicing Plan and and the Block Plan approval is the development of condition of approval is ensuring that

I have attached as appendices a list of reasons why, in my opinion, the Block Plan as presented to Council is not in conformity with the Greenbelt Plan and a detailed approvals history. Links to support the above can be found within these Appendixes.

Regards,
Irene Ford

⁴ Information Obtained through FOI in a memo compiled by MNR staff. Available upon request.

⁵ York Region's Northeast Vaughan Water and Wastewater Services Environmental Assessment page: <https://www.york.ca/newsroom/campaigns-projects/northeast-vaughan-water-and-wastewater-services-environmental>

⁶ <https://www.lea.ca/Our-Projects/Projects/Pine-Valley-North-Pedestrian-Bridges>
<https://www.botconstruction.ca/project/pine-valley-pedestrian-bridges/>

⁷ "...28,837 persons equivalent must be reserved for Block 27's full build-out specifically, pursuant to York Region's Block 27 Prepaid Development Charge Credit / Reimbursement Agreement and the City's Block 27 Water and Wastewater Servicing Capacity Allocation Agreement"

<https://pub-vaughan.escrimemeetings.com/filestream.ashx?DocumentId=156441>

⁸ Staff Report: <https://yorkpublishing.escrimemeetings.com/filestream.ashx?DocumentId=18245>

Appendix 1: Block 41 Block Plan is NOT in Conformity With Greenbelt Act & Plan

- The Minister did not approve parks on the Greenbelt. ROPA7 was never approved by the Minister, it does not legally exist
- The Minister gave Vaughan Council policy tools upon approval of York Region's Official Plan (YROP). Policy 3.2.5 (e): ***"The location, range and types of parkland and recreational uses permitted will be determined by the local municipality through its official plan and/or secondary plans"***
- Block 41 Secondary Plan, as approved by the tribunal, was **not** approved with parks on the Greenbelt⁹.
- The Block Plan presented today is not in conformity with the Greenbelt Plan even with YROP, 2022 land use designation change and policies. Whenever there is a conflict the Greenbelt Act and Plan prevails. Policy 3.2.4 (1) clearly states:

"Settlement areas outside the Greenbelt are not permitted to expand into the Greenbelt."

- Parks and stormwater ponds are part of the settlement area, in the absence of the development they would not be built.
- Mapping depicts lands as Greenbelt's Natural Heritage System (NHS) in their entirety; agricultural land use designation was intentional to protect natural hydrological features¹⁰. Subject to the NHS policies of the Greenbelt Plan. Greenbelt Plan. Section 1.4.1 (2):
"Refer to Schedule 4 of this Plan to determine if the lands are located within the Natural Heritage System, which is an overlay on top of the agricultural land base designations of the Agricultural System within official plans. If so, refer to the Natural System policies (section 3.2)."

⁹ <https://www.omb.gov.on.ca/e-decisions/PL200135-AUG-18-2021.pdf?file-verison=1726176584376>

¹⁰ "These lands, part of the river valleys running south off the Oak Ridges Moraine, are known as the "Greenbelt fingers." The "fingers" are integral components of the Greenbelt that were the subject of specific attention during its creation, to ensure "permanent protection of the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization will be organized."

https://www.thestar.com/opinion/contributors/government-silence-on-york-region-s-proposal-to-open-up-the-greenbelt-is-deafening/article_596e4ffc-59f4-53ad-a136-d20092518de2.html

- Block 41's Greenbelt contains Ecological Significant Groundwater Recharge Areas (ESGRA) - lights up purple in Map 12B of YROP¹¹. Important areas for groundwater recharge to support sensitive coldwater streams and wetlands. Subject to the Key Hydrologic Area policies of the Greenbelt Plan.

Map 12B, York Region Official Plan, 2022



¹¹ <https://storymaps.arcgis.com/collections/8a1198ece3d941c9ae4d9a9cb4cb2f41?item=17>

Appendix 2: Block 41 Approvals History

- 2012 ROPA 2 is approved as an appeal to York Region's 2010 Official Plan (YROP, 2010)¹²
- 2019 Secondary Plan Approved by Vaughan Council
- 2020 (January) Secondary Plan is approved with amendments brought forward by Regional Councillor Jackson 1) to lower the density & 2) direct staff to consider downgrading rural greenbelt to agriculture¹³. Most shocking was the recommendations for the lower density somehow became direction to staff to use as the basis for the ongoing municipal comprehensive review for all of York Region
- 2020 (June) the MZO request¹⁴ is presented as a Member's Motion¹⁵ by the Mayor as an addendum to Council. It is not reviewed by planning or legal staff. Two justifications:
 - 1) Invested sewer and water infrastructure for 15 years including installation of water and sewer infrastructure over 10 years ago at their cost - how could this be installed if the development was not yet approved?
 - 2) override the 'frivolous' appeal from the gas plant due to COVID-19 delays MZO mapping prepared by Malone Given Parsons first instance of parks and stormwater infrastructure on the Greenbelt
- 2020 (June) Prepaid Development Charge Credit Agreement is approved by York Region. Block 41 is a benefiting landowner. The agreement requires \$156.4M security to finance infrastructure, \$4M of which is not recoverable and they can recoup costs starting in 2028 over 5 years, if over 90% of the benefiting blocks are registered¹⁶
- 2020 (Oct 14) the interim servicing strategy is approved providing a temporary servicing solution for Block 41 amongst others
- 2020 (Oct 15) the MZO request was formally submitted to the Minister of Municipal Affairs and Housing. Why did staff waited over 4 months to submit the MZO Request¹⁷
- Nov 6, 2020 O. Reg. 644/20 approved less than a month later from submission with no parks on the Greenbelt

¹² Scroll to YROP, 2010 and Amendments: <https://www.york.ca/york-region/regional-official-plan>

¹³ <https://yorkpublishing.escrimeetings.com/filestream.ashx?DocumentId=10489>

¹⁴ Developers MZO Request for Block 41:

<https://pub-vaughan.escrimeetings.com/filestream.ashx?DocumentId=36701>

¹⁵ Mayor's Motion: <https://pub-vaughan.escrimeetings.com/filestream.ashx?DocumentId=36700>

¹⁶ Staff Report: <https://yorkpublishing.escrimeetings.com/filestream.ashx?DocumentId=18245>

¹⁷ Memo sent by City Manager obtained through FOI Request, Available upon request.

- August 18, 2021 the Secondary Plan is approved with no parks on the Greenbelt by Order of the Tribunal¹⁸.
 - Mr Given at the OLT Tribunal hearing have given his expert opinion that the Secondary Plan is consistent and/or in conformity with the PPS, 2020, Growth Plan, 2019, Greenbelt Plan, 2017 and YROP, 2010 (refer to paragraphs 15, 17, 21, 19). It is hard to understand how this is possible given MZO would blow up conformity with everything except the Greenbelt Plan.
 - Unclear why all the core features drop off the protected Greenbelt.
 - The Secondary Plan approved by Order of the Tribunal, Aug 18, 2021. *“Under the Greenbelt Plan, a significant portion of Block 41 is designated Protected Countryside, which includes an Agricultural System and a Natural Heritage System, together with settlement areas... **These areas are provided with permanent protection from development under the Greenbelt Plan, except as identified under section 4.0 of the Greenbelt Plan.***
 - Tribunal was not presented with a Secondary Plan that included parks on the Greenbelt; there are no parks, only a trail system. **Why in 2024 is protection no longer permanent?**
- 2021 (June) ROPA7 Comes forward to Vaughan Council receives, meaning takes no action, contrary to the staff report today and Council meeting minutes¹⁹.
- 2021 (October) ROPA7 is endorsed by York Region Council, staff report confirms Vaughan Council received staff report. Regional Councillor Jackson is prepared with a motion that overturns and ignores staff recommendations opposing ROPA7 as well as the Greenbelt Foundation, TRCA and much public decent and worst of all directs it be taken directly from the landowners paid consultant Malone Given Parsons Communications^{20, 21}. Any reference to ROPA7 is erroneous. Even if approved by Vaughan and York Region Councils. ROPA7 was never approved by the Minister.
- 2021 (Dec) Auditor General Report on Land Use Policy in Ontario clearly states the MZO's are disrupting planning in Ontario and creating a two tiered planning process²².

¹⁸ Refer to:

<https://www.omb.gov.on.ca/e-decisions/PL200135-AUG-18-2021.pdf?file-verison=1726176584376>

¹⁹ Refer to pg. 11 of pdf: <https://pub-vaughan.escrimeetings.com/filestream.ashx?DocumentId=79631>

²⁰ York Region ROPA7 Council Minutes:

<https://yorkpublishing.escrimeetings.com/Meeting.aspx?Id=ce80af79-c97f-4f6f-ae5e-788eeea304de&Agenda=PostMinutes&lang=English&Item=58&Tab=attachments>

²¹ Malone Given Parsons Letter and Draft of ROPA7:

<https://yorkpublishing.escrimeetings.com/filestream.ashx?DocumentId=27408>

²² https://www.auditor.on.ca/en/content/annualreports/arreports/en21/AR_LandUse_en21.pdf

- Nov 4, 2022 YROP approved by Minister with developer requests adopted verbatim affecting Greenbelt Fingers in Markham and Vaughan²³. Policies that were later revoked as per Bills 150 and 162.
 - YROP, 2022 changed the land use designation from agriculture to rural to allow active parkland but based on uses permitted in local Official Plan and/or Secondary Plans. Parkland was never approved on the Greenbelt in the MZO, Secondary Plan or Official Plan.
 - June, 2024 version²⁴ as posted, three policies specific to Greenbelt Lands in - emphasis added.
 - 3.2.5 e. *Urban agriculture, recreational and parkland uses on rural lands within the linear river valleys identified in policy 5.3.5, which may include serviced playing field and golf courses. **The location, range and types of parkland and recreational uses permitted will be determined by the local municipality through its official plan and/or secondary plans.***
 - 5.3.5 *That rural lands within the linear river valleys of the Greenbelt Protected Countryside shown on Map 1C, that are surrounded by the urbanizing Designated Greenfield Areas of Vaughan and Markham, per Map 1B, shall be identified in local official plans and protected for natural heritage restoration and urban agriculture.*
 - 5.3.6 *That, notwithstanding policy 5.3.2, permitted uses within the rural lands identified in policy 5.3.5 are limited to the following:*
 - a. *Passive recreation;*
 - b. *Environmental management, restoration, and enhancement;*
 - c. *Compatible urban agricultural uses; and*
 - d. *Recreational and parklands uses in accordance with the Greenbelt Plan and local municipal secondary plans on the basis of appropriate technical studies and natural systems planning.*
- Nov 4, 2022 Greenbelt Removals are released one of which is within Block 41²⁵
- 2023 (Feb) Public Meeting for Block Plan, consultant shows up with a different Block Plan showing housing on the Greenbelt.

²³ Minister's Decision on York Region's Official Plan: <https://prod-environmental-registry.s3.amazonaws.com/2022-11/York%20OP%20-%20Decision%20-%20Signed%20November%204%202022.pdf>

²⁴ See: <https://www.york.ca/york-region/regional-official-plan>

²⁵ ERO Posting Greenbelt Removals: <https://ero.ontario.ca/notice/019-6216>

- 2023 (August) Auditor General and Integrity Commissioner release Greenbelt Removal Reports
- 2023 (Sept) Government announces they will be reversing Greenbelt Removals
- 2023 (Dec) Bill 150 is passed and reverses the highly specific language adopted permitting parks on the Greenbelt and this is reaffirmed by Bill 162 Feb, 2024.

Appendix 3: Quotes from the Humber River Watershed Characterization Report²⁶, October 2023 About the East Humber Which Block 41 is located Within.

“There is declining quality, distribution, and quantity of natural cover (with higher quality habitats in the Main Humber and East Humber subwatersheds in the northern part of the watershed).”

“The average habitat health rating for benthic invertebrate communities is ‘fairly poor’ which suggests substantial to severe water quality impacts in the watershed.”

“Most of the remaining aerial coverage of KHAs and KHF’s is split between the East and West Humber subwatersheds, with the more urbanized Lower Humber and Black Creek subwatershed containing the least amount of aerial coverage of KHAs and KHF’s.

Similarly, most of the coverage of each KHA and KHF is within the Greenbelt (79% wetlands, 70% inland lakes, 76% seepage areas and springs, 72% SGRAs, 63% ESGRAs, 67% SSWCAs, and 60% HVAs). Overall, this demonstrates the importance of the Greenbelt in conserving these features and areas as well as the likely impact of previous development practices.

“ESGRAs have been identified within TRCA’s jurisdiction (and are included in the definitions of significant groundwater recharge areas in the Growth Plan for the Greater Golden Horseshoe (Ontario 2020) and Greenbelt Plan (Ontario 2017)). Even where the volume of groundwater discharge may be relatively low, groundwater discharge plays an important role in the ecological health throughout the watershed.”

“The East Humber provides the largest amount of potentially occupied habitat (1,708 ha)” {referencing redbreasted dace}

Chloride (CWQG objective, chronic = 120 mg/L, acute = 640 mg/L)	Main, East and West Humber	100%	-	-	Above in West Humber and East Humber	↑, trendline above chronic objective
	Lower Humber and Black Creek	100%	-	-	Above chronic; above and approaching acute in Upper Humber and Lower Black Creek, respectively	

26

<https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2023/10/23154227/FINAL-Humber-River-Watershed-Characterization-Report-October-2023.pdf>

“PolyCyclic Musks (PCMs) are used as fragrances in many personal care products, including soaps, shampoo, detergents, and deodorants. PCMs are a concern because their chemical structure is similar to persistent organic pollutants (e.g., PolyChlorinated Biphenyls - PCBs), which are widely suspected to have carcinogenic and negative developmental and reproductive effects (Safe 1992). In a 2019 study, the East Humber subwatershed and mid-reaches of the Main Humber subwatershed had greater PCM concentrations than the headwaters of the Main Humber subwatershed, and similar PCM concentrations to rural locations within Rouge River and Little Rouge River. ...Urban sites had higher PCM concentrations compared to rural sites and sources included stormwater, illegal sewer cross connections, and wastewater treatment plant discharges (Wong et al. 2019). Chemicals of emerging concern have many effects on the natural environment, including a range of negative effects on aquatic life. The Great Lakes basin is home to more than 30 million people and numerous species of plants and wildlife that rely on the lakes for freshwater and habitat. It is important to recognize the land-lake connection and the need to manage these chemicals at their source before they enter waterways.”