

May 27, 2019

Sanjay Coelho  
Environmental Policy Branch  
40 St Clair Avenue West, Floor 10  
Toronto, ON, Canada  
M4V 1M2

Dear Mr. Coelho,

**RE: Excess Soil Regulatory Proposal and Amendment to the Record of Site Condition (Brownfields) Regulations**

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We are pleased to see that the Ministry of Environment, Conservation and Parks (MECP) is proceeding with these important amendments relating to the movement of excess soils and the Record of Site Condition requirements. In particular, the proposed addition of Section 49.1 (Standards Deemed to be Met) to O. Reg. 153/04 will remove an unnecessary barrier when dealing with properties that are impacted by salt-related impacts, including electrical conductivity (EC) and sodium adsorption ratio (SAR), that have resulted from historical salting operations for safety purposes.

Given the number of projects that are impacted by this barrier, we ask that the MECP proceed as quickly as possible to bring this amendment into force, and if need be, proceed with this amendment separate from the other amendments included with this regulatory package. Given the significance of this amendment to certain brownfield properties, it would be helpful for brownfield developers to have an understanding of when this provision will come into force.

Yours truly,

**5799 Yonge Street Limited Partnership**



Fan Yang

Deputy General Manager