A Guide to Railfanning in Toronto 2010

Toronto Railway Historical Association

The TRHA receives frequent requests from railway enthusiasts seeking information about what there is to do in the city. We have compiled a list of railfan activities around the Greater Toronto Area in which one can participate during 2010.

**Toronto Railway Heritage Centre**
The railway museum located in the 32-stall John Street Roundhouse officially opens on May 28, 2010.

- **Stalls 15-16-17** are occupied by the Toronto Railway Heritage Centre, and will be used for the restoration of artifacts by the dedicated volunteers of the Toronto Railway Historical Association.

The **Toronto Railway Heritage Centre features the following attractions:**

- The 120-foot rotating **turntable** built in 1929 and restored to full operation in 2007.
- Several pieces of railway equipment that are moved around the park as required. See complete list below.
- The 1896 **Don Station**, relocated from the Todmorden Museum in 2008 and fully restored at Roundhouse Park in 2009-2010.
- The 1896 **Cabin D** interlocking tower originally located west of Bathurst St. and its auxiliary building/toolshed, both restored in 2009-2010.
- A restored century-old grade crossing **watchman’s shanty** restored in 2009.
- Canadian National steam locomotive **6213**, on display at the Exhibition Grounds from 1960 to 2009.
- A passenger carrying **miniature railway** that operates along a ½-kilometer right of way through Roundhouse Park.
- Motive power provided by **TRHC #3**, a miniature live steam locomotive assembled by TRHA volunteers in the roundhouse machine shop.
- A dozen illustrated **interpretive plaques** explaining the history of the roundhouse and the surrounding railway lands.
- **Guided tours** of Roundhouse Park and surrounding sites of historic interest.

Information about ongoing activities at the Toronto Railway Heritage Centre is regularly updated at:

http://www.trha.ca/news.html

*The TRHC is always looking for volunteers who are willing to devote time and effort to preserving Toronto’s railway heritage, usually on Saturday and/or Sunday. Whatever your skills, we can find something worthwhile for you to do.*
The Museum Collection

Locomotives

TRHC #1  50-Ton Diesel Switcher
    - Canadian Locomotive Company 1950
CNR #4803 GP7 Diesel Road Switcher
    - General Motors Division 1953
CNR #6213 4-8-4 Steam Locomotive
    - Montreal Locomotive Works 1942
CPR #7020 S2 Diesel Switcher
    - American Locomotive Company 1944
CNR #9159 F7 Diesel (Cab only)
    - General Motors Diesel 1951
TTR Crane 18-Ton
    - Pyke Ltd. 19??

Canadian Pacific Passenger Cars

Cape Race Buffet/Solarium/Lounge
    - National Steel Car/Canadian Pacific 1929
Jackman 14-section Sleeper
    - Canadian Car & Foundry/CP 1931

Freight Cars

#70 Caboose
    - Toronto, Hamilton & Buffalo Ry. 1921
#101 Vinegar Car
    - Reinhart Vinegars 1938
#188625 Wooden Fowler Boxcar
    - Canadian Pacific 1917
The Remainder of the Roundhouse

• Stalls 1-14 are occupied by Steam Whistle Brewing, which offers regular tours of the brewery as well as a rental venue for a variety of social functions.
  http://www.steamwhistle.ca/

• Stalls 18-32 are occupied by Leon’s Furniture Store, which opened in the summer of 2009. One can appreciate the vast size and panoramic sweep of the interior of the roundhouse from inside Leon’s. An exhibition of railway history photographs is on view in the display cases inside the Leon’s entrance foyer (Track 32). Outside the foyer on the west side of the coaling tower is a giant wall mural by artist David Oram.
  http://www.leons.ca/lang.aspx

Union Station

The Toronto Railway Historical Association is working with the City of Toronto and GO Transit, the owners of Union Station, to develop a historical museum presence at this National Historic Site. The city has embarked on a $640 million revitalization of the station. Meanwhile, regular monthly tours of Union Station are held on the last Saturday of every month at 11 AM. Cost is $10. More information about the next tour can be found at http://www.trha.ca/ or by calling 416-917-8220.

Note: there will be no regular Union Station tours on May 29, 2010 because of Doors Open and the June 26, 2010 tour has been cancelled because of the G-20 summit being held nearby.

Regular tours will resume on Saturday, July 31, 2010.

The City of Toronto maintains an active website about the history of Union Station and ongoing developments at:
  http://www.toronto.ca/union_station/

Heritage Toronto Walks

Two walks with a railway orientation will be led by TRHA Historian Derek Boles in 2010.

Sunday, July 11 @ 1:30 PM
  Toronto’s Railway Heritage:
  A tour of Union Station and the Railway Lands surrounding the Roundhouse.

Saturday, September 11 @ 1:30 PM
  Summerhill/Marlborough:
  A tour of a neighbourhood originally shaped by the building of the CPR’s North Toronto Subdivision in 1884 and the 1916 North Toronto Station/Summerhill LCBO.
  http://www.heritagetoronto.org/
Jane’s Walk
Sunday, May 2 @ 11 AM.

Toronto’s Lost Railway Heritage:
A walk led by Derek Boles, visiting sites in downtown
Toronto that once had a railway connection, including a variety of buildings north of
Front Street. A viewbook will be provided showing sites and buildings that no longer
exist. For example, the first locomotive built in Canada was assembled on the site of St.
Michael's Hospital. One of a series of walks named for urban activist Jane Jacobs.
http://www.janeswalk.net/

Doors Open Toronto- 2010
Saturday, May 29 and Sunday, May 30 from 10 AM to 4 PM.

There will be special displays and tours sponsored by the TRHA at
Union Station and the Roundhouse, in addition to the regular
activities. The official opening of the Toronto Railway Heritage
Centre will be held on Friday, May 28. A model train show for the
entire family will also be held in the Steam Whistle Beer Hall on
Saturday and Sunday.

Other Doors Open venues of railway interest in past years have
included:
* Former CPR North Toronto Station/Summerhill LCBO.
* TTC Lower Bay subway station
* TTC Harvey Shops
* TTC Greenwood Maintenance Shops
* TTC Wychwood Car Barns
* Canadian Pacific Ry. Royal York Hotel

The venues vary from year to year. The Toronto Star publishes a supplement listing all
the venues on the Thursday before the event. More information at:
http://www.toronto.ca/doorsopen/

Doors Open Markham- 2010
Saturday, August 28 from 10 AM to 4 PM.

The York-Durham Heritage Railway has operated hourly excursions
between Markham and Unionville in past years. Both stations were
built by the Toronto & Nipissing Railway in 1871 and feature
interpretive displays.
http://www.doorsopenontario.on.ca/userfiles/HTML/nts_1_11341_1.html
Railway Excursions
Due to uncooperative railways and onerous insurance regulations, railfan excursions have largely disappeared from common carrier railways in Canada. For those looking for interesting train rides, we recommend the following trips on regularly scheduled trains operating out of Union Station:

GO Transit
• Tour of the Lakeshore East and Lakeshore West corridors, which operate 7-days a week in both directions. One way to do this is Union Station east to Oshawa, back through Toronto and west to Aldershot, then back east to Union Station. There are trains every hour in both directions so this is easy to schedule. Be sure to buy a day pass for this trip and you can ride back and forth as often as you want, however this tour will occupy almost five hours without any added stopovers.

• The Hamilton GO Centre is well worth a visit. The Centre is housed in the former Toronto, Hamilton & Buffalo station opened in 1933 and has been beautifully restored. There is a historical exhibit on the second floor above the ticket windows. Trains only run through to Hamilton during weekday rush hours so a bus connection between the station and Aldershot will be necessary at other times.
• The Milton, Georgetown, Barrie, Richmond Hill and Stouffville corridors are peak service in one direction on weekdays only so scheduling is much more difficult, although possible using buses in one direction. The Richmond Hill line is recommended as being particularly scenic.

http://www.gotransit.com/

Toronto-Niagara Bike Train
Between May 21 and September 26, 2010, GO will be operating a weekend service between Toronto and Niagara Falls. The fares on this route are usually considerably more economical than VIA’s. Although the coach seats are not as comfortable for long distances, the panoramic upper level windows afford a fine view. The trains also have provisions for carrying bicycles without having to disassemble and box them. During 2010 the Bike Train Initiative is testing out excursions to other parts of Ontario.

http://www.biketrain.ca/

VIA Rail
Short one-day excursions are possible on most of VIA’s routes out of Toronto. The following are suggested:

• Toronto to Niagara Falls. Depart Union Station at 0830 on the Amtrak Maple Leaf for New York, arriving Niagara at 1024. Return from Niagara to Toronto at 1415 or 1745. Some of these trains are not daily.

• Toronto to London. Depart Union Station at 1105 on #85 via Guelph and Kitchener, arriving London at 1405. Depart London 1533 on #76 and return by a different route via Brantford and Aldershot, arriving back in Toronto at 1738.

• Toronto to Montreal Corridor. An 0705 departure on Train 52 makes a number of one-day excursions possible to Ontario cities such as Cobourg, Belleville and Kingston. Unfortunately the VIA stations are some distance away from the downtown areas where most of the tourist attractions and restaurants are located.

• Toronto to Brantford or Guelph. The VIA stations are close to downtown in both these cities and there are a number of attractions within walking distance. Service is infrequent on the Guelph line and returning on a GO bus provides more flexibility in scheduling.

VIA frequently adjusts their schedules so check with them before making any definite plans.

http://www.viarail.ca/en_index.html
Other Railway Museums

• Aside from the Toronto Railway Heritage Centre, there is only one museum in the GTA specifically devoted to rail and that is the Halton County Radial Railway which, although located 40 miles west of the city, is Toronto’s semi-official traction museum, featuring streetcars, interurbans and subway cars. In addition to the displays, there are rides on some of the restored electric cars along a one-mile section of the former Toronto Suburban Railway.

http://www.hcry.org/

• The Markham District Historical Museum on Highway 48 has some railway displays, including the relocated CPR Locust Hill station, the business car Acadia, a snowplow, and a caboose.

http://www.markham.ca/Markham/Attractions/Museum/

Tourist Trains

There are several tourist train operations in the GTA located outside the city so you would need a car to get to them. They are mostly diesel-hauled operations except for South Simcoe and the Waterloo Central which feature steam, but check with them first since their steam operations have been irregular in recent years.

• Credit Valley Explorer Tour Train
http://www.creditvalleyexplorer.com/

• South Simcoe Railway
http://www.southsimcoerailway.ca/

• Waterloo Central Railway
http://www.steam-train.org/

• York-Durham Heritage Railway
(Hourly GO service on weekends from Union Station Bus Terminal)
http://www.ydhr.on.ca/WelcomePage.html

• Guelph Junction Express
http://www.destinytours.com/gje/

Train Watching in the Greater Toronto Area

Note that the G-20 Summit is being held at the Toronto Convention Centre on June 26 & 27, 2010. This will severely restrict any railfanning activities in the days and possibly week before this event. We advise people to stay away from the area around Union Station, the Convention Centre and the Roundhouse on those two days.

Normally there are numerous locations in Toronto from which you can safely observe trains.
• **Union Station** hosts over 235 trains daily on weekdays although you can’t actually see them from the station unless you are outside under the trainshed. Security is being considerably tightened in 2010 by both the City and GO Transit. Photography is not allowed under the trainshed and it’s a paid fare zone, meaning that you could be fined if you are found there without a ticket. Neither GO nor VIA allow photography in their sections of the Union Station interior. The city is extensively renovating the station and GO is rebuilding the trainshed so expect massive disruptions until 2015 when these projects are scheduled to be completed.

• There are better vantage points from which to observe and photograph trains just **west of Union Station**. The Skywalk provides a fine view although the windows make photography difficult. There are outside vantage points with unobstructed views around the CN Tower. Both the Bathurst and Spadina road bridges provide excellent vantage points with spectacular views and have ample sidewalks. In addition to the scheduled VIA and GO trains, there are frequent positioning moves between Union Station and the passenger yards in Mimico as well as occasional CN freight trains using the High Line.

• **East of Union Station** is more problematic for photography since the area surrounding the rail corridor is 18 feet lower than the tracks. The first road bridge crossing the rail corridor is at Main Street in the east end of town. Much further east at Port Union, just west of the Rouge Hill GO station, is a new park along the Lakeshore that parallels the tracks on the south side. Trains move through there fast and without much warning so a timetable is necessary.

• One of the most famous train watching locations in North America is **Bayview Junction** near Hamilton. One can comfortably observe and photograph CN, CP, VIA, Amtrak and GO trains from this spot. Every summer there is an informal gathering of dozens of railfans who spend the day picnicking, socializing and taking photographs. This year’s event is on June 19, 2010.

http://www.trainweb.org/railsintoronto/bayjct.html

**Train Watching Websites**

• Thomas Blampied maintains a Guide to Trainspotting in Canada website with useful tips and suggested locations in the GTA.

http://www.trainweb.org/thomasblampied/canadianrailphotographyguide.htm

In 2009, Thomas published a book, **Rails of the GTA**, containing some excellent contemporary photographs of railroading in the Toronto area:

http://www.trainweb.org/thomasblampied/mybook.htm
• Paul Cordingley’s *Rails in Toronto* website is useful for information about accessible vantage points for train watching around the city although the site hasn’t been updated for some time. Paul has divided the site into several geographic areas so be sure to investigate the links leading to each area.

http://www.trainweb.org/railsintoronto/index.html

**C.P.R. North Toronto Station**
The Canadian Pacific Railway North Toronto Station opened in 1916 and remained in service until 1930. It is one of the finest examples in Canada of railway station Beaux-Arts architecture and was beautifully restored in 2003. The building now houses the largest liquor store in Ontario and can be visited during regular LCBO hours of operation.

http://www.lcbo.ca/lcbo-ear/jsp/storeinfo.jsp?STORE=10

**Train Yards and Equipment Shops**
None of the train yards and shops in the GTA encourage visitors and trespassing on railway property is now dealt with harshly. One can observe the action in these facilities at a distance from sidewalks on nearby public roads and bridges. Paul Cordingley’s website provides useful advice on finding good vantage points.

• Canadian Pacific Railway **Toronto Yard**
http://www.trainweb.org/railsintoronto/eastend.html

• Canadian National Railway **Macmillan Yard**
http://www.trainweb.org/railsintoronto/nortor.html

• GO Transit **Willowbrook Yard**
http://www.trainweb.org/railsintoronto/westend.html

• VIA Rail **Toronto Maintenance Centre**
http://www.trainweb.org/railsintoronto/westend.html

**Train Stores**
There are some train/hobby shops in the GTA although surprisingly few in the city of Toronto itself. The best-known shop in the area is **George’s Trains**, which closed its store at 510 Mt. Pleasant Rd. in May 2009 after 47 years at that location. George’s has now been consolidated at their Markham location, the former Railview Trains operated by the late Dave Morgan until 2007.

George’s new location is at **550 Alden Rd.** (905-470-6200) in Markham near Warden Ave. and Hwy 407 and is not easily accessible by transit although it is
possible using the TTC and York Region Transit. The store is located adjacent to CN’s York Subdivision, which sees frequent freight train service throughout the day.

http://www.georgestrains.com/index.php

- The Credit Valley Railway Company is located west of Toronto at 2900 Argentia Rd., Unit 24 in Mississauga L5N 7X9. This is an exclusively-trains store with an extensive stock and knowledgeable staff.

The Credit Valley Railway Company Ltd

- Crossbuck Hobbies is located east of Toronto in Pickering on Brock Road.

Crossbuck Hobbies

The TRHA does not imply an endorsement of these stores over any others not listed. A more complete listing of train stores in the GTA can be found in the back pages of a recent issue of Model Railroader or Canadian Railway Modeler magazines.

**Club Model Railroad Layouts**

There are several model railroad clubs in Toronto and the GTA that regularly schedule open houses on weekends for casual visitors and families. Most of them will also welcome serious hobbyists at other times. Always check first to see if you are welcome.

- One of the most outstanding train layouts in Canada is Aberfoyle Junction, located west of Toronto near Guelph. The layout is a huge 0-scale recreation of southern Ontario in the 1950s and has been written up extensively in Model Railroader. The club usually schedules open houses on weekends in the spring and fall.

Aberfoyle Junction

- The Model Railroad Club of Toronto is one of the oldest clubs in Canada and is located downtown west of Strachan Avenue. Founded in 1938, the club was for many years located in Union Station. The club hosts open houses in February and allows individual visits on Wednesday evenings.

Model Railroad Club of Toronto

- The Scarborough Model Railroad Club was formed in 1962 and features both HO and N-scale layouts. The club is located near Birchmount and Danforth roads in the former City of Scarborough. The club features both open houses on selected Sunday and individual visits on Tuesday evenings.

Scarborough Model Rail Roaders

- York Railway Modellers is located at 5 Oakland Avenue in the former city of North York near the intersections of Hwys 400 & 401. The 40 x 40 foot layout models the steam-diesel transition era. The club hosts open houses and individual layout visits.

York Railway Modellers
Toronto Transportation Commission
The TTC is the largest transit system in Canada and the third busiest in North America. In addition to its 1,500+ buses, the TTC operates three services of interest to railfans.

Subway
The subway system consists of three routes:

1. **Yonge-University-Spadina** line was completed in stages between 1954 and 1996 and travels in a U from Yonge and Finch all the way downtown to Union Station then up University and Spadina to Downsview. Parts of the line are in the open between Bloor and Eglinton and along the northern section of the Spadina line, which is being extended to Vaughan in York Region.

2. **Bloor-Danforth** line is the cross-town route from Kipling in the west to Kennedy in the east. It was completed between 1966 and 1980 and is in the open at the far ends and in one spectacular crossing of the Don Valley underneath the Bloor Viaduct. At the east end of the line it parallels the old Canadian Northern Railway route through Scarborough.

3. **Sheppard** line is the newest part of the subway, completed in 2002 and running entirely underground from Yonge to Don Mills. For many years, Toronto was derided for its plain subway station architecture and decoration, especially compared with Montreal. The Sheppard line’s stations are of some architectural interest.
Many railfans riding the subway position themselves in the front car where they are able to obtain a driver’s eye view of the train’s progress through the tunnels. There is almost always someone (including many fathers and young sons!) occupying this space so the best way to obtain a seat is to ride the train to the end and wait for the space to become available.

**Streetcars**

There are 11 streetcar routes in Toronto, most of them of the old fashioned street running style that has disappeared from many cities in North America. Among the more interesting routes are:

**501 QUEEN**: at 15.4 miles between Long Branch in the west and Neville Park in the east, this is one of the longest streetcar lines in North America. At the west end of the line is a scenic private right-of-way and the interesting Humber loop where some cars short turn.

**509 HARBOURFRONT**: runs from the underground platform at Union Station, through a tunnel beneath Bay Street, along at-grade private right-of-way on Queens Quay, some street running, then onto a newly created private right-of-way on Fleet Street and into Exhibition Loop.

**Scarborough RT**

This 4-mile rapid transit line in Scarborough operates mostly on elevated tracks between Kennedy subway station and McCowan Rd.

Visiting railfans who are sampling various TTC operations will want to obtain a **Day Pass** for $10 (regular cash fare is $3). The TTC publishes a printed **Ride Guide** that is recommended for planning excursions; it’s free and available at most subway stations. [http://www3.ttc.ca/index.jsp](http://www3.ttc.ca/index.jsp)

Extensive information on the TTC and GO transit systems and their histories are available at the [Transit Toronto website](http://transit.toronto.on.ca/index.shtml)

**Train Shows**

There are not nearly as many train shows in Toronto as there used to be in the 1980s. The annual CRHA train show in March was once the largest such event in Canada and has now disappeared, a victim of declining attendance and steep rents.

- The annual **Christmas Train Show** at the International Centre is now the largest train show in town. In 2010, it is being held November 20 & 21. [http://www.antiquetoys.ca/index.html](http://www.antiquetoys.ca/index.html)
The Lakeshore Model Railroad Club Flea Market is held twice a year at Humber College. The spring event is on Saturday April 17. The fall event is usually the first Sunday after Labour Day this year on September 12.

There are many more train shows held in the area surrounding Toronto and the GTA where venues can be rented for a more reasonable cost. There are two websites with information about upcoming shows:
http://www.boldts.net/TrainsModelShows.shtml
http://trainshows.blogspot.com/

Bicycle Trails
Toronto’s extensive ravine system has made it possible to build a large network of bicycle trails, some of which are of interest to railfans.

• The Belt Line Trail follows the route of the old Toronto Belt Line, a commuter operation that ran in the 1890s. One can follow almost the entire route of the Yonge St. Loop between the CN Newmarket Sub. in the west, through Fairbank, Forest Hill, Mt. Pleasant Cemetery, to Rosedale in the Don Valley.

• The Lower Don Trail parallels the south end of CN’s Bala Sub where it branches off from the Kingston Sub. near the Don River. The trail runs as close to the tracks as one can get to a moving train without risking your life or being arrested for trespassing.

• The city of Toronto is building a new 6.5 kilometer bicycle trail along the rail corridor from West Toronto to downtown, the northern section of which opened in 2009.

The City of Toronto publishes the annual Toronto Cycling Map, which available for free at municipal venues and shows all the trails in the city as well as rail lines and streets. An online version is available at:
City of Toronto: Toronto Cycling map

Internet
The best way to keep up to date with railfan happenings in Toronto is through the Internet. The News & Events section of the TRHA website is regularly updated, sometimes daily:
TRHA News & Events
Yahoo Discussion Groups

There are two Yahoo groups of specific interest. Joining either of them requires approval from the moderator for each group:

The TRHA group is restricted to members of the Toronto Railway Historical Association or those who can convince the moderator that they have a constructive interest in the organization:
http://finance.groups.yahoo.com/group/TRHA/

The Toronto Railway Heritage group features postings and discussions about Toronto Railway history. A daily mailing provides detailed information about events in Toronto’s railway history that occurred on that day.
http://finance.groups.yahoo.com/group/ToRyHeritage/

Raymond Kennedy’s Old Time Trains website provides a wealth of information about the history of railways in Toronto, particularly the Canadian Pacific Railway. Accessing the site does not require approval and it is frequently updated:
http://www.trainweb.org/oldtimetrains/whatsnew.html

Publications

Although entire volumes have been devoted to picturesque branch lines with a half dozen locomotives, there are relatively few books on Canada’s cities and their relationships with the railways.

• A bibliography of historical books is available at the TRHA website:
  http://www.trha.ca/bibliography.html

• Many of the books listed are out of print but can be obtained through the Toronto Public Library:
  http://www.torontopubliclibrary.ca/

• TRHA historian Derek Boles and the author of this guide has written Toronto’s Railway Heritage, which was published by Arcadia in 2009. The book contains 225 images of railways in the city from 1850 to 1930 and is available through many local bookstores as well as the usual online sources.

• Derek has also written several articles for the TRHA website that describe various historic topics in some detail and can be found by searching through the archives on the left side of the News Home Page. These include:
  * Toronto and It’s Miniature Railways
    http://www.trha.ca/archivetaimr.html
* The Evolution of Roundhouse Park
  January 17-29, 2009
* Toronto’s First Union Station
  February 6-21, 2009
* Pierre Berton & the National Dream
  March 11-24, 2009
* Moving Locomotives Through the Streets of Toronto 1852-2009
  June 21, 2009
* The History of the Conboy Carriage Company
  July 12, 2009
* An Ode to a Canadian National Steam Locomotive
  August 28, 2009
* One Day at the John Street Roundhouse in 1966
  August 20, 2009
* The Beautiful Josephine
  September 29, 2009
* A Brief History of the Railfan Hobby
  December 17-21, 2009

• One of the most detailed histories of Toronto’s railways is Rod Clarke’s Narrow Gauge Through the Bush, about the Toronto & Nipissing and Toronto, Grey & Bruce railways that were built in the 1870s.
  http://www.narrowgaugethroughthebush.com/

• Ian Wilson has published nine books on the Canadian National steam era in southern Ontario. Although none of the books are specifically about Toronto, most feature information about trains that operated to and from the city:
  http://www.canadianbranchline.com/

• The bible for Canadian Railfans is the Canadian Trackside Guide published annually by the Bytown Railway Society. In 2010, the next edition is being published in the Fall. Bytown’s monthly periodical Branchline is Canada’s leading publication of railway news of interest to Railfans. Both publications are available at any hobby shop.
  http://www.bytownrailwaysociety.ca/
This circa-1960 map of the Toronto area was published by the Canadian Freight Association. Canadian National lines are indicated in blue and Canadian Pacific in red. Abandonments since then include:

1. The CN line below Davisville (?) was a remnant of the Toronto Belt Line.
2. The CN line connecting Oriole and Leaside.
3. The CN line in the upper left through Caledon.
4. CP industrial spurs in Scarborough.

- The CP line north of Streetsville is now the Orangeville Brampton Railway.
- The CN line shown as under construction is now the York Subdivision.

*The information in this document was compiled by Derek Boles, TRHA Historian, and the opinions therein do not necessarily reflect TRHA nor TRHC policy.*