

August 21, 2020

Antonia Testa
Special Project Officer, Environmental Assessment Services
Ministry of the Environment, Conservation and Parks
antonia.testa@ontario.ca

RE: ERO Posting 019-1882

Ms. Testa,

Thank you for the opportunity to provide comments on the proposed regulation for a streamlined environmental assessment (EA) process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project. City of Brampton staff, while generally supportive of efforts to shorten the timeline for confirmation of the transportation corridor and completion of the project, offer the following comments regarding the proposed regulation:

1. The proposed streamlined EA process is not clearly laid out in the regulation. It would be helpful to have a process map that outlines the steps in the proposed EA workflow.
2. The proposed issues resolution process must ensure that stakeholder comments and objections are addressed in a timely manner. Staff see benefit in the having the revised EA process offer multiple opportunities for consultation as the study progresses through preliminary and detailed design. This would help allay concerns staff have about comments and/or objections being left for resolution too late in the process to be properly addressed.
3. Staff note that having the Ministry of Transportation administer the issues resolution process (taking the public objections process out of the hands of the Ministry of Environment, Conservation and Parks) may engender concerns regarding the transparency and impartiality of the process. The issues resolution process will need to be well documented and transparent if it is to be seen as fair.
4. Staff are concerned that permitting early works to proceed to construction before completion of the draft Environmental Impact Assessment Report may unduly influence the identification of the corridor alignment. Construction of a new bridge, for example, would effectively "lock in" the alignment of the corridor adjacent to it before the EA is complete. The early works process must require MTO to provide justification for the need to undertake early works, including demonstration that all required planning and design work has been completed. Staff acknowledge that the proposed regulation

speaks to requirements for consultation and issues resolution for early works projects and will partake of any and all opportunities to provide comments on such projects.

5. Staff request that the revised EA process consider, and strongly weight, the environmental, economic, and social impacts of the transportation corridor during route identification and preliminary and detailed design. The corridor will have significant implications for the lands through which it will pass. It will impact, for example, the location of residential and employment land uses, urban structure, local transportation networks, and natural heritage systems.

The revised EA process must proceed hand-in-hand with municipal planning initiatives. As an example, staff point to ongoing work to create a secondary plan for the Heritage Heights area in Northwest Brampton, through which the GTA West Transportation Corridor will pass. Heritage Heights is intended to be a livable, vibrant and connected community, and a concept plan reflecting this has been endorsed by City of Brampton Council. Staff evaluated a range of mobility approaches for the community and concluded that running a conventional highway through the centre of it would preclude the planning, design, and placemaking objectives for this future community. Staff contend that replacing the highway through this area with an urban boulevard offers mobility, socio-economic, environmental, and financial advantages. Staff request that this plan, and planning initiatives underway in other sections of the corridor, receive significant weight in the revised EA process.

6. The Ministry of Energy, Northern Development and Mines and the Independent Electricity System Operator are conducting a study to identify and protect a corridor of land for future electricity infrastructure in the Greater Toronto Area, whose study area overlaps that of the GTA West Transportation Corridor study. It is understood that the two studies are proceeding independently, but it is noted that one of the principles under which the transmission corridor study is being conducted is to co-locate the corridor with other linear infrastructure such as the GTA West Transportation Corridor. It would be of benefit to Brampton and other municipalities if there were greater coordination between the two studies and if they resulted in a single corridor to be protected for future infrastructure (as appropriate for the areas through which the corridor will pass). Staff request, therefore, that consideration be given to amending the proposed regulation for the streamlined GTA West Transportation Corridor EA process to require greater coordination between the two studies.

Staff require supplementary information to determine whether additional comments on several topics are warranted (the proposed regulation does not provide the level of detail needed on how some elements of the revised process would differ from the existing one to serve as the basis for comments). Questions arising from this, the responses to which could inform additional comments, include:

1. What are the criteria for distinguishing a minor change from a significant one in the addendum process for both the Early Works Report and the Environmental Impact Assessment Report? Who will make the determination and will municipalities and other stakeholders be informed?
2. Will the proposed requirements for consultation with government agencies, stakeholders, the public, and indigenous communities differ from the current requirements and, if so, how?
3. How will the proposed issues resolution process differ from the existing public objections process?
4. What changes will be made to the *Environmental Assessment Act* and other legislation, as well as MTO standards and practices, to remove duplication?

Please contact the undersigned should you have any questions about the comments provided above.

Staff look forward to working with the Province to advance and complete the EA study for the GTA West Transportation Corridor.



Brian Lakeman, Transportation Policy Planner
City of Brampton | Planning, Building and Economic Development Department
Email: brian.lakeman@brampton.ca
Telephone: 905-874-3480