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Greenbelt Council

Conseil de la
ceinture de verdure

August 18, 2020

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Re: Proposed regulation to shorten / alter the GTA West Corridor Environmental Assessment process

Dear Minister Clark,

Consistent with its past letters of advice, the Greenbelt Council continues to have strong reservations about new transportation corridors in the Greater Golden Horseshoe in terms of both lack of need and the fact that such large-scale infrastructure compromises the protection of prime agricultural lands and the long-term integrity of natural heritage areas in the Greenbelt. It is council's view that in light of the significant stakeholder concerns surrounding the proposed GTA West Corridor (GTAW), the Province's proposed regulation to shorten or alter the GTA West Corridor Environmental Assessment process is ill-advised. Today, more than ever we need strong evidence-based planning and that requires, in part, a robust environmental assessment regime.

Greenbelt Council recommends that the proposed regulation to shorten or alter the GTA West Corridor Environmental Assessment process (ERO 019-1882) be withdrawn.

In the past, as is the case today, significant concerns were raised by Greater Golden Horseshoe stakeholders about a potential GTAW highway and in 2016 the provincial government of the time appointed an Advisory Panel to review the GTAW Environmental Assessment (EA). This EA underpins the current process. The Panel's 2017 report concluded that the GTAW is "not the best way to address changing transportation needs." It stated that the EA failed to "demonstrate that a new corridor was the only reasonable alternative." Moreover it did not demonstrate need for the corridor, nor did it provide "reasonable alternatives for removing prime agricultural lands or crossing key Greenbelt natural heritage or hydrologic features."

The Panel noted that among other things, the proposed highway would not deliver the proposed benefits and indeed would save only “approximately one minute of travel time savings per vehicular trip across the GGH.” The Panel recommended that alternative approaches should be further explored, providing benefits on a regional scale. Examples included: adding dedicated truck lanes to Highway 407 and reducing truck tolls; congestion pricing which could deliver travel time savings; and slower growth and more compact land use scenarios that could result in shorter travel times than those of a new highway.

The Panel noted that the EA proposed a new corridor without conforming to the *Greenbelt Plan* policies to avoid key natural heritage and hydrological features, “unless need had been demonstrated and no reasonable alternative was available.” Subsequently the government of the time cancelled the potential GTAW highway.

While the EA has been modified since the Panel report, stakeholder concerns have been heightened by the provincial proposal to “streamline” the GTAW EA process, to permit “early work” (e.g., utility relocation, bridge and transitway station construction) to proceed prior to completion of the EA. It is Council’s view that this would seriously compromise the EA process.

In the interests of fair and transparent decision-making that respects the public consultation process, it is Council’s advice that the GTAW EA process be neither shortened nor altered.

Sincerely,

A handwritten signature in black ink, appearing to read "David Crombie". The signature is fluid and cursive, with a large initial "D" and "C".

David Crombie
Chair, Greenbelt Council

Copies to:

The Honourable Caroline Mulroney, Minister of Transportation
The Honourable Jeff Yurek, Minister of Environment, Conservation and Parks
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing
Greenbelt Council members
Ed McDonnell, CEO, Greenbelt Foundation
Greater Golden Horseshoe stakeholders