

Antonia Testa

Ministry of Environment, Conservation and Parks
EAmmodernization.MEDP@ontario.ca

August 19, 2020

Re:ERO #019-1882 Proposed Regulation for a Streamlined Process for the Greater Toronto Area West Transportation Corridor Project

Dear Ms. Testa,

Thank-you for the opportunity to provide comments on the proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area (GTA) West Transportation Corridor project.

City of Mississauga staff have participated in the GTA West Transportation Corridor Environmental Assessment (EA) since the beginning of the project in 2008 and continue to have concerns with the impact to City-owned parkland and future employment development in the vicinity of the proposed corridor. The City's concerns with the proposed regulation to streamline the EA process center around sufficient time to review technical reports and update City Council, the process to resolve concerns and how minor changes are defined as part of the early works process.

Attached for consideration are City of Mississauga comments on the GTA West proposed streamlined process, regulation ERO #019-1882.

If you have any questions on the attached, please contact the undersigned.

Sincerely,

Susan Tanabe

Susan Tanabe
Manager, Transportation Planning
Infrastructure Planning & Environmental Services
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attach.

City of Mississauga Comments

Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project.

ERO # 019-1882

1. Concern the streamlined process will significantly reduce review periods
 - As part of the streamlined process an Environmental Conditions report (ECR) and Environmental Impact Assessment Report (EIAR) will be prepared and MTO will *"notify and consult with government agencies, stakeholders, the public and Indigenous communities"*. The regulation does not specify how long the review period is and if they will be reporting back to the commenting parties on how concerns were addressed on the project.
2. The issues resolution process may not allow a fair and impartial solution to concerns
 - The regulation proposes to replace the public objections process with an issues resolution process to address outstanding concerns. This process would be developed and administered by MTO.
 - Will stakeholders have input into the development of the issues resolution process? If not, will they be able to provide comments on the process steps before they are finalized? What is the amount of time allocated to resolving issues through this process?
 - What happens if a commenting body does not feel MTO has adequately addressed a concern?
3. The preliminary early works construction may take place before all issues are resolved through the EIAR
 - The regulation proposes that preliminary early works including new bridge construction, bridge replacement or expansion, transitway station construction and utility relocation could occur before the EIAR is finalized. An Early Works report will be prepared for review and comment by the public.
 - This suggests commenting agencies/the public/stakeholders will need to participate in two parallel processes and keep track of how issues are resolved. Is this more efficient than having one process (EIAR) to resolve concerns?
4. Minor changes can proceed without further consultation
 - Under the Other Considerations section it is noted that minor changes to the EIAR and Early Works reports can proceed without further consultation. What is considered a minor change? Examples would be helpful.

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