



August 22, 2020

**Re: [ERO 019-1882](#): Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project**

Please accept these comments as Oak Ridges Moraine Land Trust's (ORMLT) submission on the proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's GTA West Transportation Corridor project.

ORMLT has serious concerns with the proposal to exempt the GTA West highway from a full and thorough environmental assessment, and instead move to a streamlined assessment. A new highway of this size will bring significant impacts to crucial environmental features like rivers, wetlands, forests, and thousands of hectares of prime agricultural lands including about 1000 hectares in the Greenbelt. It will also create air pollution affecting nearby residents and increase greenhouse gas emissions, and bring little benefit to commuters at a massive cost to taxpayers. We join Environmental Defence and other organizations and individuals recommend that the proposed regulation to shorten the environmental assessment process be withdrawn.

**This highway requires a thorough and complete environmental assessment to determine its true impacts. It is irresponsible to proceed with "early works" before the environmental assessment is complete.**

Our concerns can be summarized in the following key points:

**1. The highway will destroy important green spaces and prime farmland.**

The corridor needed for the GTA West highway would be 170m wide and about 50km long. It would cut through the Greenbelt in Vaughan and across the Whitebelt in Caledon. The highway would have massive impacts on natural areas such as rivers, valley lands, wetlands, conservation areas and forested areas, including approximately [85 water crossings](#), and prime agricultural lands, including about 1000 hectares in the Greenbelt in Vaughan. It would also result in environmental damage in these areas from road salt and stormwater runoff into sensitive ecosystems.

The proposed streamlined EA process would allow construction to start with 'early works' like bridges and utility relocations before completion of the draft Environmental Impact Assessment Report. These proposed early works like bridges would be constructed where the highway crosses some of the most sensitive areas along the route like streams, rivers, and other important natural features. These sensitive areas are exactly the types of environments that need a full and thorough environmental assessment. Starting construction before the impacts are fully known negates much of the value of an environmental assessment.

## **2. Evidence shows that commuters will see little to no benefit from this highway.**

An [expert advisory panel](#) appointed by the provincial government determined in 2017 that the proposed highway would save drivers a mere 30-60 seconds per trip, and that the transportation needs of GTA West residents would be better served by alternatives like public transit. To respond to this evidence by speeding up construction of the highway instead of exploring these more cost-effective alternatives is irresponsible. In addition, the new highway will not connect GTA-West residents to existing urban centres where the majority of jobs are located.

There is no evidence that highway expansions solve traffic congestion. This is due to what's known as "induced demand." Research has shown that construction of new highway capacity is met soon thereafter with an exactly proportional increase in traffic, due to an increase in driving behaviour. This pattern has been [well-documented](#) in highway projects around the world.

## **3. The GTA West Highway would be a significant cost to taxpayers.**

The cost of the transportation corridor was estimated in 2012 to be \$4.8 Billion, and is likely over \$6 Billion today due to inflation and the increased costs of construction and land acquisition. Tying up billions of dollars in highway infrastructure will make it difficult to deliver much needed public transit projects, and is a misallocation of government resources at a time when Ontario is fighting a pandemic, and facing other budgetary and economic challenges. This level of expenditure surely warrants a full and thorough environmental assessment.

## **4. People who live along the highway route will suffer health impacts.**

[Our recent modeling](#) estimated that pollution from traffic causes almost 900 premature deaths per year in the Greater Toronto and Hamilton Area (GTHA). Peel Region is already a hotspot for air pollution from vehicles, and that this pollution is most severe near highways and interchanges. People who live close to highways



suffer greater health impacts from air pollution, and will experience higher risk of diseases like asthma, lung cancer, childhood bronchitis, and other cardiovascular issues.

More information is needed about the health impacts of this highway and resulting traffic pollution on residents who live nearby before proceeding with construction. Public health organizations have requested a [Health Impact Assessment](#) to determine the health impacts of this highway. Environmental Defence supports this request and agrees that this study should be incorporated into the assessment of the impacts of the GTA West highway.

### **5. Building Highway 413 will mean more greenhouse gas emissions from vehicles as traffic increases to fill the available space.**

Increasing carbon pollution from transportation will move Ontario farther away from meeting the climate change goals committed to in its Made-In-Ontario Environment Plan. At a time when vehicles are already the biggest source of carbon pollution in Ontario (and growing), paving the way for an increase in greenhouse gas emissions from vehicles conflicts with the Province's own stated goals.

### **6. The Province should consider alternatives to the GTA West Highway.**

The Province's expert panel determined that alternatives to the GTA West Highway were a better approach to accommodate transportation in the growing region. Alternatives like Light Rail Transit (LTR) and GO Train expansion would help serve a rapidly expanding region where public transit ridership is on the rise, and many proposed projects are still unfunded. Ideas like giving trucks priority on the 407 would also help ease pressure on existing highways and speed up goods movement. These alternatives would also provide economic stimulus and jobs.

The GTA West highway would go through one of the last undeveloped parts of Brampton. Brampton City Council recently [approved a plan](#) to create a walkable, cycleable, 20-minute community based around a boulevard, instead of a highway – a creative alternative that would fit with Brampton's plans to build a more dense, sustainable city for the future.

These alternatives would all create jobs and move people effectively in the region. The Province should take the time to fully examine the cost savings and transportation improvements resulting from non-highway alternatives.

## **7. The pandemic has drastically changed our commuting patterns.**

The long-term impacts of the pandemic are still unknown. There is a very real possibility that this highway will be a stranded asset if significant numbers of commuters shift to working from home and away from highway travel. Rather than fast tracking a new highway, it is prudent to explore emerging travel patterns which may impact future transportation needs. The Province should re-evaluate the need for increased highway capacity now that travel patterns are rapidly shifting.

### **Conclusion**

In summary, a 400-series highway through important green spaces is not the kind of project that should be exempted from key parts of an environmental assessment. We request that the Ministry of Transportation not proceed with the proposal to streamline the environmental assessment process for this project.