

March 3, 2021

Ms. Anjala Puvananathan, Director
Impact Assessment Agency of Canada
Ontario Region
600-55 York Street
Toronto ON M5J 1R7

Dear Ms. Puvananathan,

Re: Designation Request for the Proposed Bradford Bypass Project under the *Impact Assessment Act*

Thank you for your February 12, 2021 correspondence regarding the designation request submitted on February 3, 2021 by Ecojustice on behalf of Rescue Lake Simcoe Coalition and Simcoe County Greenbelt Coalition. The Ecojustice submission has requested the Minister of the Environment and Climate Change Canada designate the proposed Ontario Bradford Bypass Project under subsection 9(1) of the *Impact Assessment Act*.

The Ontario Ministry of Transportation is proposing a new four-lane highway, connecting Highway 400 and Highway 404. The proposed Bradford Bypass Project (also commonly known as the Highway 400-404 Link) will connect Highway 400 in Bradford West Gwillimbury (Simcoe County) to Highway 404 in East Gwillimbury and crossing King Township (York Region).

The Ontario Ministry of Transportation completed an Individual Environmental Assessment (EA) for the Highway 400 – 404 Link concurrent with the EA for the Highway 404 extension in 1993 and was granted approval by the Ministry of Environment for both EA's on August 28, 2002. In 2004, the Province designed the approved alignment for the Highway 400 – 404 Link as a Controlled Access Highway Corridor under the Public Transportation and Highways Improvement Act, thereby protecting the route from development until the highway is constructed. As a condition of the EA approval, the design and construction of the highway became subject to the Ontario Ministry of Transportation's Class EA process for Provincial Transportation Facilities, as a "Group A" project.

The Impact Assessment Agency of Canada has invited affected municipalities to provide input on the Bradford Bypass Project to inform the Agency's analysis of the designation request. In particular, the Impact Assessment Agency of Canada is seeking input on:

- Whether any York Region requirements apply to the Project?
- Would any of those involve consultation with the public and Indigenous groups?
- What environmental, social, economic or health issues would those requirements address?
- Whether the Ontario Ministry of Transportation is addressing the interests and issues of importance to York Region.

The Impact Assessment Agency of Canada has requested municipal responses by March 3, 2021.

York Region has long supported the Bradford Bypass Project

The Ontario Ministry of Transportation received EA approval for the Bradford Bypass Project in 2002. The Ontario Ministry of Transportation also undertook the Simcoe Area Multimodal Transportation Study in support of the Provincial Growth Plan (Simcoe Sub-Area Growth Plan Amendment 1 – January 2012). The study was completed in March 2014 and reaffirmed the need for the Bradford Bypass Project.

The Ministry of Transportation consulted York Region throughout these studies. York Region staff have reported to Council at key milestones through the provincial study process and York Region Council has consistently supported the Bradford Bypass Project as highlighted below.

York Region Council March 2008 resolved:

Regional Council request the Regional Chair to present a brief to the Ministers of Public Infrastructure Renewal, Transportation and Municipal Affairs and Housing on the urgent need for action on the Bradford Bypass, including adding the Bradford Bypass into the Provincial Growth Plan and committing to develop an implementation schedule with York Region.

York Region Council September 2009 resolved:

Regional Council request the Province to expedite its review and study of the following facilities with funding commitments:

- a. Yonge Street Subway*
- b. Bradford Bypass*
- c. Highway 427 extension to Major Mackenzie Drive*
- d. Completion of the GTA West Individual Environmental Assessment (IEA) study*

York Region Council June 2011 resolved:

Council endorse this staff report and Attachment 1 as the Region's official comments on the Provincial Proposed Amendment No. 1 to the Growth Plan: An Amendment and Implementation Tools for the Simcoe Sub-Area. [Staff comments attached to the Council Report: York Region Council had repeatedly expressed the opinion that investment in transportation infrastructure was required to accommodate the Provincial 2031 growth allocations. Critical road investments needed include extended Highways 404 and 427, constructing the Bradford Bypass and capacity improvements to the existing 400-series highways. York Region Council has taken the position that the Bradford By-pass extension is an immediate need.]

York Region Council June 2012 resolved:

Council direct staff to work with Simcoe County, Bradford West Gwillimbury, East Gwillimbury and Newmarket to develop a joint communication strategy to advocate for the Highway 400-404 Link and to report back to Council by the end of 2012 with an update on the progress.

York Region Council June 2019 resolved:

Council support a robust highway network to move people, goods and services and achieve provincial Growth Plan population and employment objectives in York Region and encourage:

- a. The resumption of Environmental Assessment for GTA West Highway for near-term inclusion in the Southern Highways Program*
- b. The inclusion of the Highway 400-404 Connecting Link and the Highway 404 Extension to Highway 12 in the next Southern Highways Program*

The Bradford Bypass Project supports York Region's Official Plan and Transportation Master Plan

With a population of 1.2 million residents, The Regional Municipality of York is one of Canada's largest municipalities and the second largest business centre in Ontario. Ranked as Ontario's fastest growing large municipality, managing growth over the coming decades is important. York Region is forecast to reach approximately 2.02 million people and 990,000 jobs by 2051.

The York Region Official Plan 2010 describes how York Region plans to accommodate future growth and development while meeting the needs of existing residents and businesses in the Region. It provides directions and policies that guide economic, environmental and community planning decisions.

The Bradford Bypass Project is identified as a planned transportation corridor in the York Region Official Plan (Map 12 Street Network) and included in policy 7.2.56:

To work with the Province and local municipalities to plan and protect for the following corridors and facilities:

- a. Highway 427 north to the GTA West Corridor*
- b. Highway 404 north beyond Ravenshoe Road*
- c. the Bradford Bypass (Highway 400-404 Link)*
- d. the GTA West Corridor*

The York Region Transportation Master Plan 2016 establishes the vision for transportation services, assesses existing transportation system performance, forecasts future travel demand, and defines actions and policies to address road, transit and active transportation needs in York Region to 2041.

The Bradford Bypass Project is identified as an integral component of the transportation network required to service York Region residents and businesses (Map 8 Proposed 2041 Road Network) and described in section 5.2.1 Provincial Infrastructure Plans:

Highway 400/404 Link: This would provide a connection between Highway 400 and Highway 404 in East Gwillimbury. Its benefits include creation of a more resilient network by connecting the two major north-south highways. It would reduce the need for the Region to expand Queensville Sideroad and would reduce traffic congestion on Regional roads, including Highway 9, Green Lane and Yonge Street. An Environmental Assessment for the Highway 400/404 Link was approved in 2002 and designated as a Controlled Access Highway under the Public Transportation and Highways Improvement Act. It is not identified in the current Provincial Growth Plan for 2031. Given the project's benefits to the Regional network, this TMP assumes it will be in place by 2041.

Both York Region’s Official Plan and Transportation Master Plan were developed with extensive consultation, including the public, stakeholders, government agencies and Indigenous groups.

The Ontario Ministry of Transportation has consulted York Region throughout the Bradford Bypass Project

The Ontario Ministry of Transportation has consulted York Region throughout the planning for the Bradford Bypass Project. Through the Individual EA process, Simcoe Area Network Study, and ongoing Preliminary Design/Class EA for the Bradford Bypass Project, York Region has been consulted and actively engaged. At key milestones, York Region staff will continue to report to Council, including highlighting issues or concerns for consideration in the provincial Preliminary Design/Class EA process.

The provincial EA process provides for a robust level of environmental assessment and stakeholder consultation. The Region expects the current provincial environmental process will continue to address environmental, social, economic and health issues as well as the necessary public consultation to balance the needs of all project stakeholders.

Specific Input to the Federal Impact Assessment Agency of Canada

Specific responses for the input questions posed by the Federal Impact Assessment Agency are summarized in the table below:

Impact Assessment Agency Question	Regional Response
Whether any York Region requirements apply to the Project?	The Region requires conformity with the Region’s Official Plan as well as the Transportation Master Plan.
Would any of these involve consultation with the public and Indigenous groups?	The Region consulted extensively for the Official Plan and the Transportation Master Plan and would expect the Province to duly consult all stakeholders as required in the Provincial Environmental Assessment process.
What environmental, social, economic or health issues would those requirements address?	The Region would expect the Provincial Environmental Assessment process to address all relevant environmental, social, economic or health issues as raised by community stakeholders.
Whether the Ontario Ministry of Transportation is addressing the interests and issues of importance to York Region?	The Ontario Ministry of Transportation is addressing the interests and issues as identified by the Region through the completed Individual Environmental Assessment process as well as the ongoing Class Environmental Assessment.

Should you have any questions, please feel free to contact Brian Titherington, Director of Transportation and Infrastructure Planning at 1-877-464-9675 ext. 75901.

Sincerely,

Paul Jankowski
Commissioner of Transportation Services

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