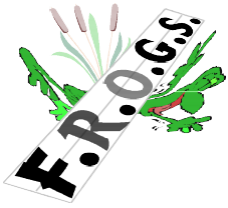


**C. William D. Foster**

East Gwillimbury, ON



FORBID ROADS OVER GREEN SPACES]

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January 10, 2022

Regional Chair Emmerson and Regional Councillors  
York Region  
17250 Yonge Street  
Newmarket, ON  
L3Y 6Z1

By Email

Dear Regional Chair Emmerson and Regional Councillors;

Re: January 13<sup>th</sup> Committee of the Whole – Bradford Bypass

Please consider this communication in your deliberations concerning the proposed Bradford Bypass which is an agenda item for your January 13<sup>th</sup> Committee of the Whole Meeting.

By means of this letter, we are respectfully requesting and recommending York Region Council withdraw its support for the Bradford Bypass as currently approved and request the Federal Government conduct a full impact assessment for this project.

Our Association, together with Bradford based, Stop the Bradford Bypass and Concerned Citizens of King Township submitted a formal request for a Federal Impact Assessment on November 9. A previous formal request by Rescue Lake Simcoe Coalition and Simcoe County Greenbelt Coalition was turned aside by the Federal Minister of Environment for reason that he was satisfied the province had appropriate protocols and safeguards in place to ensure that the public's concerns would be properly addressed. The October 7, 2021, Bradford Bypass Exemption Regulation (O. Reg. 697/21), dispensed with these safeguards and eliminated the public's final appeal rights. These appeal rights were tied to the Class EA study which has now been dispensed with. Our formal request for a Federal Impact Assessment can be found at: [https://frogs.ca/shared-files/2372/Federal-Impact-Request-for-Bradford-Bypass-November-9-2021-FROGS-STPP-CCKT-digitally-signed\\_Signed.pdf](https://frogs.ca/shared-files/2372/Federal-Impact-Request-for-Bradford-Bypass-November-9-2021-FROGS-STPP-CCKT-digitally-signed_Signed.pdf)

As a result of the Bradford Bypass Exemption Regulation, this 16 km 400 series highway through the Holland Marsh, adjacent wetlands and green belt, now has full, unconditional, Environmental Assessment Approval. This approval is solely based on the 2002 EA approval of an Environmental Assessment Study dated December 1997. While the 2002 EA approval contained a number of important conditions, including the requirement to conduct a further Class

EA study to address specific conditions of the approval, all of this has now been dispensed with by this regulation.

We request you look at a letter that was recently sent to all Lake Simcoe Watershed Councils, (including York Region) by Save Lake Simcoe Coalition and Simcoe County Greenbelt Coalition. This letter more fully addresses the impact of this exemption regulation. East Gwillimbury's letter can be accessed from their website at:

<https://eastgwillimbury.civicweb.net/document/154996/Rescue%20Lake%20Simcoe%20Coalition%20-%20Bradford%20Bypass.pdf?handle=3909CC2DB0D249F591B8514691497319>

So the bottom line is: in his rush to build this election platform highway, Premier Ford has enacted drastic retroactive legislation to expedite construction of this highway. This entire project is based on obsolete facts and ignores major environmental protection legislation, the most concerning being the Lake Simcoe Protection Act. Premier Ford is even moving to construct a bridge over County Road 4 (HWY 11) north of Bradford as early as next month. The Province has provided no rationale for the urgent requirement to build this bridge now. This is approximately 2 years before MTO will have completed the design of this highway and obtained all necessary permits.

When the previous request for Federal Impact Assessment was submitted, the Impact Assessment Agency of Canada sought representations from York Region concerning its views about the Bradford Bypass and the desirability of a Federal Impact Assessment. The attached response essentially states that York Region strongly supports the proposed highway and relies upon the Province of Ontario to conduct a robust environmental assessment. TAB 1

“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.”<sup>1</sup>

Now that the province has passed its Bradford Bypass Exemption Regulation, the environmental assessment protections enumerated in York Region's response to the Impact Assessment Agency have been eliminated.

Key points for your consideration:

- Projects such as this require proper due diligence. Ford is taking irresponsible shortcuts for political reasons. As elected councillors, you have a stewardship duty to ensure need and justification has been properly established for this project in this location.
- This project is not in compliance with Lake Simcoe Protection Act (LSPA). No reasonable routes or alternatives have been or will be considered for this route. This is a requirement of the LSPA.

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<sup>1</sup> Tab 1 – March 3, 2021 letter to Ms. Anjala Puvananathan, Director, Impact Assessment Agency of Canada Ontario Region

- Because the Bradford Bypass Exemption Regulation grants final EA approval for this project, there is no current legal ability to consider reasonable alternative routes or other alternatives for this project.
- Unless the Bradford Bypass Exemption Regulation is rescinded, the only legal way to prove need and justification for this project is now through a Federal Impact Assessment.

Premier Ford has now eliminated the key Environmental Assessment commitments for this project you were relying on. He has done this solely for his own political benefit. He is leaving the Region totally exposed. It is now totally reasonable and appropriate for York Region to take a step back on its support for this highway. The Region can continue to express its strong support for a highway to connect highways 400 with 404 north of Hwy 407. You now, however have every justification and in fact, obligation, to request a second opinion about both the design and location of this highway.

As an elected councilor, each of you swore an oath of office which includes the following duty of care:

“I will truly, faithfully and impartially exercise this office to the best of my knowledge and ability”.

This duty of care encompasses the 3 roles councillors have under the Municipal Act:

- Representative,
- Policy-maker, and
- Steward.

As councillors, you have an obligation to your constituents to act as Stewards not only of your Region’s finances but also its ecosystem. This because of your Official Plan development and enforcement obligations. Your obligations to Protect Lake Simcoe are also addressed in the Lake Simcoe Protection Act. Allowing MTO to build this highway based solely on 25 year old information and to commence early construction of a bridge on County Road 4 is simply not prudent! Early construction of this bridge will foreclose any future opportunities to properly consider the need and justification for this freeway in this location and potential alternative corridors.

This issue is not going to go away - you will be taking a stand on behalf of York Region no matter what you do.

Your Council now has essentially has 2 options:

1. Do nothing -or-
2. Ask that further due diligence be done by an independent, unquestionably competent, party to ensure the optimal solution or solutions are employed to address the transportation needs in this part of York Region. The Impact Assessment Agency of Canada satisfies this criteria.

If you do nothing;

1. You are actively endorsing the province's apparently politically motivated highway building campaign knowing that this highway is based on obsolete evidence and is effectively exempt from current environmental protection legislation such as the Lake Simcoe Protection Act, and other generally accepted Environmental Protection Legislation and,
2. You are derelict in your duty of care for reason that you abdicated your statutory stewardship and representative responsibilities to the Premier of Ontario to further his political aspirations.

If you ask that further due diligence be undertaken by the Impact Assessment Agency of Canada;

1. You will be properly exercising your duty of care.
2. If, as the province contends, everything they are doing with this highway is "kosher", then all you are doing is asking for a second opinion.

The impact of this highway on our ecosystem, especially Lake Simcoe, will likely be catastrophic. A second opinion is clearly warranted!

Also attached for your information is our Fact Sheet entitled: REASONS WHY WE NEED A TOTALLY NEW HOLISTIC STUDY NOT RESTRICTED TO MTO'S MANDATE. This also includes suggested alternative routes and other potential solutions.

Respectfully submitted:

C.W.D. Foster

On Behalf of Forbid Roads Over Green Spaces

Enc.



## ATTACHMENT 1

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:

| <b>Impact Assessment Agency Question</b>  | <b>Regional Response</b>  |
|---|---|
| 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 <u>duly consult all stakeholders as required in the Provincial Environmental Assessment process.</u>           |
| What environmental, social, economic or health issues would those requirements address?                             | The Region would expect the <u>Provincial Environmental Assessment process to address all relevant environmental, social, economic or health issues as raised by community stakeholders.</u>  |
| Whether the Ontario Ministry of Transportation is addressing the interests and issues of importance to York Region? | The Ontario Ministry of Transportation is <u>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.</u> |



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

12602084



## REASONS WHY WE NEED A TOTALLY NEW HOLISTIC STUDY NOT RESTRICTED TO MTO'S MANDATE

### BACKGROUND

- The 1997 EA Study only addressed MTO's mandate – (essentially the safe movement of long distance travel).
- MTO acknowledged there were likely other solutions but stressed that these were local government responsibilities.
- Local governments and the public, having just endured the subsequently abandoned, substantially EA approved, Hyw 89 Extension EA, thought the Bradford Bypass was simply an upgraded replacement for the Hwy 89 Extension EA.
- To this day, local governments, especially Bradford's mayor, profess that the Bradford Bypass is desperately needed to address local traffic congestion.
- The Bradford Bypass 1997 EA says that the Bradford Bypass will not resolve local traffic congestion – this is a local responsibility.
- The 1997 EA relied upon the municipal Official Plans for travel demand purposes. The current Regional Municipal Comprehensive Review includes projected populations that are nearly 4 times those contemplated the 2002 EA approved, 1997 EA Study.<sup>1</sup>

| Projected Population         | 1997 Environmental Assessment Study – Approved 2002 |                     | Comprehensive Municipal Review |
|------------------------------|---|---------------------|--------------------------------|
|                              | Year  | 1996                |                                |
| East Gwillimbury             | 18,000  | 25,200              | 127,600 <sup>2</sup>           |
| Bradford                     | 18,200  | 32,900 <sup>3</sup> | 85,610 <sup>4</sup>            |
| <b>Total area population</b> | <b>36,200</b>                                       | <b>58,100</b>       | <b>213,210</b>                 |

<sup>1</sup> Bradford Bypass Environmental Assessment Study Report – December 1997 – Exhibit 3-1

<sup>2</sup> York Region Municipal Comprehensive Review – S 2.2 Integrated Growth Management  
[https://www.york.ca/wps/wcm/connect/yorkpublic/e4c4bde6-44f6-44f5-81da-05926f1caace/21070\\_draftROP2021Dec0121TextOnly.pdf?MOD=AJPERES&CVID=nROtS9W](https://www.york.ca/wps/wcm/connect/yorkpublic/e4c4bde6-44f6-44f5-81da-05926f1caace/21070_draftROP2021Dec0121TextOnly.pdf?MOD=AJPERES&CVID=nROtS9W)

<sup>3</sup> Estimated – pro-rated.

<sup>4</sup> Bradford West Gwillimbury Growth Needs Assessment  
[https://www.simcoe.ca/Planning/Documents/Bradford%20West%20Gwillimbury\\_HEMSON\\_LNA%20Public%20Information%20on%20Information%20Package\\_01Oct21.pdf](https://www.simcoe.ca/Planning/Documents/Bradford%20West%20Gwillimbury_HEMSON_LNA%20Public%20Information%20on%20Information%20Package_01Oct21.pdf)

- The recent Innisfil Orbit MZO will permit expansion of Innisfil's current 40,000 population to as much as 150,000. This will further aggravate out-of-the-way-travel problems south of Cooks Bay.

## PROBLEM

- There are clear limits to the amount of salt Lake Simcoe can absorb. If the Bradford Bypass is built in the current planned corridor, it will cross both branches of the Holland River with four lane roadways carrying high volumes of high speed traffic and in the winter, emitting high concentrations of salt runoff.
- Although the 1997 EA indicates the Bradford Bypass is solving the out-of-the-way-travel problem, it is not. The Bradford Bypass is only about 1 km closer to Cooks Bay than the currently used Queensville Sideroad route (out-of-the-way-travel reduced to 11 km). The Bradford Bypass will not address local traffic congestion in Bradford because this is primarily caused by out-of-the-way-travel and trips to Newmarket.
- The magnitude of these local problems was not appreciated in the 1997 EA study. At that time, these local problems were treated as insignificant and something local governments should consider addressing at some time in the future. Over the next 5 to 20 years, these local problems will become compelling!
- The logical solutions to these local traffic problems are arterial roads over the Holland River at Ravenshoe Rd and Hochreiter Rd. (see attached TAB 1).
- **Given the impact on Lake Simcoe, by the then pre-existing Bradford Bypass, these logical local solutions will be pre-empted by the Bradford Bypass (which will cross the West Branch of the Holland River immediately north of Hochreiter Rd).**

## SOLUTION

- Conduct a comprehensive EA study to address both Provincial and Municipal travel problems and solutions. (This is what should have been done for the 1997 EA Study)
- Locate the Hwy 400 – 404 link south of Newmarket. Had the consultants known then what we know now, according to their selection chart, they would have chosen an outer ring road corridor south of Newmarket. (See attached TAB 2).

## BENEFITS

- Comprehensive planning to accommodate provincial Places to Grow Act requirements which can be incorporated in future Transportation Master Plans and Official Plans.
- Local traffic / transportation problems will be addressed in a properly planned, environmentally sensitive manner.

- MTO's stated objective of separating long distance travel from local travel will be achieved. (Local and Long Distance Travel is combined with the Bradford Bypass).
- Cost of the Hwy 400 – 404 link will be dramatically reduced.
  - No need to float the highway over the high and at times surface water table covering approximately 70% of the East Gwillimbury section of the Bradford Bypass route.
  - Elimination of piles for the elevated portion of the Bradford Bypass. (Water Reclamation Center tests show these will have to be driven 20 – 50 meters deep).
- Preservation of the Lower Landing, a pre-historic and historic site of national importance which the Chippeaws of Georgia Island want left totally untouched. (See attached TAB 3).

### CLOSING COMMENTS

Our proposed solutions are what we consider to be reasonable alternatives that warrant further study by professional traffic engineers. We requested a Federal Impact Assessment to get a second, independent, opinion on the provincial government's proposed Bradford Bypass for reason of MTO's refusal to consider any alternatives outside the boundaries of the 2002 EA approved corridor. We believe this second opinion needs to look at all major local, inter municipal and long distance travel requirements and consider all reasonable alternative solutions for the benefit of all affected jurisdictions.

Enclosures:

- 1) Local arterial road solutions
- 2) 1997 EA Study Corridors Studied and Assessment Chart.
- 3) 1998 Letters from Chippeaws of Georgina Island



Imagery ©2021 Google, Imagery ©2021 CNES / Airbus, First Base Solutions, Landsat / Copernicus, Maxar Technologies, Map data ©2021 1 km

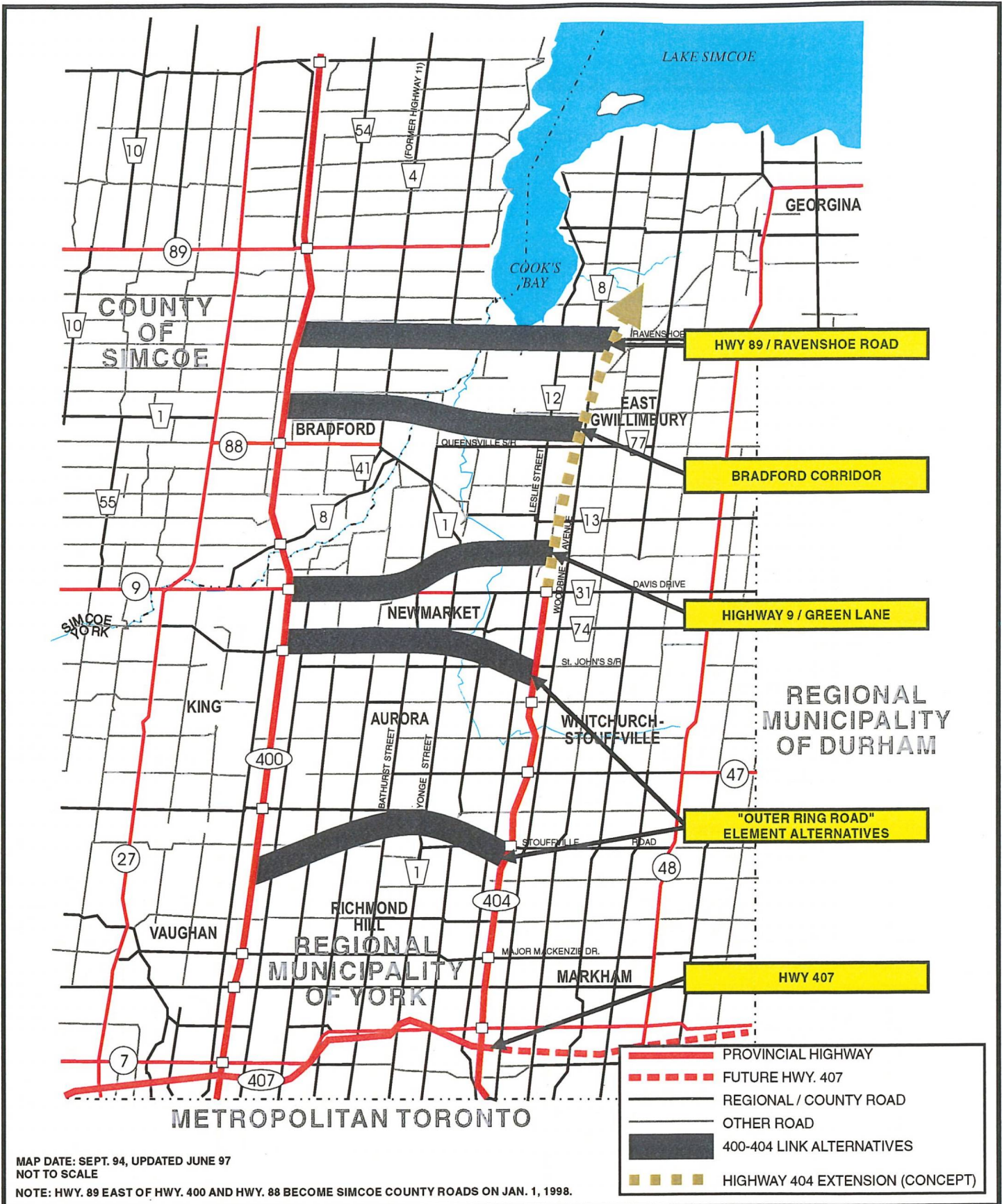
Connect Ravenshoe Road to Hyw 89 via Line 13 and 20th Sideroad

 Location of proposed bridge



**Connect Queensville Sideroad to Bradford's 8th Line via Bathrust St. and Hochreiter Rd.**

Roads in Yellow are existing routes through Bradford. New route, marked in green with red for new construction, would double the east / west capacity of roads through Bradford



MAP DATE: SEPT. 94, UPDATED JUNE 97  
 NOT TO SCALE

NOTE: HWY. 89 EAST OF HWY. 400 AND HWY. 88 BECOME SIMCOE COUNTY ROADS ON JAN. 1, 1998.

- PROVINCIAL HIGHWAY
- - - FUTURE HWY. 407
- REGIONAL / COUNTY ROAD
- · ·** OTHER ROAD
- 400-404 LINK ALTERNATIVES
- - -** HIGHWAY 404 EXTENSION (CONCEPT)

**HIGHWAY 400 TO HIGHWAY 404 EXTENSION LINK  
 (BRADFORD BYPASS) ROUTE LOCATION  
 AND ENVIRONMENTAL ASSESSMENT STUDY**

**CORRIDORS**

**EXHIBIT  
 E-5**



Newmarket / Bradford

| FACTOR / CRITERION                    | RATING           |                    |                        |          | Better | Worse | Better | Worse |
|---------------------------------------|------------------|--------------------|------------------------|----------|--------|-------|--------|-------|
|                                       | SOUTH OAK RIDGES | AURORA / NEWMARKET | HIGHWAY 9 - GREEN LANE | BRADFORD |        |       |        |       |
| <b>1. TRANSPORTATION</b>              |                  |                    |                        |          |        |       |        |       |
| 1.1 Traffic Operating Speed           | ●                | ●                  | ●                      | ●        |        |       |        | X     |
| 1.2 Traffic Volume                    | ●                | ●                  | ●                      | ●        | X      |       |        | X     |
| 1.3 Traffic Operations                | ●                | ●                  | ●                      | ●        |        |       |        | X     |
| 1.4 Safety                            | ●                | ●                  | ●                      | ●        |        |       |        |       |
| 1.5 Efficiency                        | ●                | ●                  | ●                      | ●        |        |       | X      |       |
| 1.6 Network Aspects                   | ●                | ●                  | ●                      | ●        |        | X     |        | X     |
| 1.7 Financial                         | ●                | ●                  | ●                      | ●        |        |       |        | X     |
| 1.8 Construction                      | ●                | ●                  | ●                      | ●        |        |       |        |       |
| 1.9 Staging                           | ●                | ●                  | ●                      | ●        | X      |       |        |       |
| <b>2. NATURAL ENVIRONMENT</b>         |                  |                    |                        |          |        |       |        |       |
| 2.1 Fisheries and Aquatic Habitat     | ●                | ●                  | ●                      | ●        |        | X     | X      |       |
| 2.2 Wildlife                          | ●                | ●                  | ●                      | ●        | X      |       |        |       |
| 2.3 Vegetation                        | ●                | ●                  | ●                      | ●        | X      |       |        |       |
| 2.4 Wetlands                          | ●                | ●                  | ●                      | ●        | X      |       |        | X     |
| 2.5 Groundwater                       | ●                | ●                  | ●                      | ●        | X      |       | X      |       |
| 2.6 Surface Water                     | ●                | ●                  | ●                      | ●        | X      |       |        |       |
| 2.7 Greenways and Open Space Linkages | ●                | ●                  | ●                      | ●        |        | X     |        |       |
| 2.8 Soil                              | ●                | ●                  | ●                      | ●        | X      |       |        |       |

| FACTOR / CRITERION                         | RATING           |                    |                        |          |
|--|------------------|--------------------|------------------------|----------|
|  | SOUTH OAK RIDGES | AURORA / NEWMARKET | HIGHWAY 9 - GREEN LANE | BRADFORD |
| <b>3. SOCIAL ENVIRONMENT</b>               |                  |                    |                        |          |
| 3.1 Aesthetics                             | ●                | ●                  | ●                      | ●        |
| 3.2 Highway and Construction Noise         | ●                | ●                  | ●                      | ●        |
| 3.3 Community / Recreation                 | ●                | ●                  | ●                      | ●        |
| <b>4. ECONOMIC ENVIRONMENT</b>             |                  |                    |                        |          |
| 4.1 Agriculture                            | ●                | ●                  | ●                      | ●        |
| 4.2 Commercial / Industrial                | ●                | ●                  | ●                      | ●        |
| 4.3 Special Land Use Strategies            | ●                | ●                  | ●                      | ●        |
| 4.4 Property Waste and Contamination       | ●                | ●                  | ●                      | ●        |
| 4.5 Aggregates                             | ●                | ●                  | ●                      | ●        |
| <b>5. CULTURAL ENVIRONMENT</b>             |                  |                    |                        |          |
| 5.1 Archaeology                            | ●                | ●                  | ●                      | ●        |
| 5.2 Historical                             | ●                | ●                  | ●                      | ●        |
| <b>6. APPLIED ENVIRONMENTAL CONDITIONS</b> |                  |                    |                        |          |
| 6.1 Stormwater Management                  | ●                | ●                  | ●                      | ●        |
| 6.2 Erosion and Sedimentation Control      | ●                | ●                  | ●                      | ●        |
| 6.3 Sustainable Development                | ●                | ●                  | ●                      | ●        |

Score  
 Aurora: 11  
 Bradford: 9

● Good / Most Preferred  
 ● Fair  
 ● Poor / Least Preferred

8 3 3 6

**HIGHWAY 400 TO HIGHWAY 404 EXTENSION LINK (BRADFORD BYPASS) ROUTE LOCATION AND ENVIRONMENTAL ASSESSMENT STUDY**

**COMPARISON OF ALTERNATIVE FREEWAY CORRIDORS**

**EXHIBIT 3-12**

The red 'x's reflect subsequently discovered issues - archaeological site on Lot 118 and Lake Simcoe Protection Act.



Chippewas of Georgina Island  
R.R. #2, SUTTON WEST, ONTARIO  
L0E 1R0

Phone: (705) 437-1337

Fax: (705) 437-4597

July 8, 1998

To Whom It May Concern:

It has come to our attention that one of the proposed "Bradford by-pass" routes goes through a historically significant Aboriginal site on the Holland River. While we are not opposed to the connection of the 404 to the 400, it is a major concern to us that this site may be buried under a Freeway. This site was critical and instrumental to the formation of Canada and one of the contributing factors which brought our people to take up a permanent settlement on Lake Simcoe's south shore. These grounds have had only preliminary excavation but appear to have been used for over one thousand years. The value of this place cannot be underestimated.

It is not our intention to impede progress, however we do not want to see a significant piece of history such as this lost forever. Not only is the camp a home of our forefathers, but given the Nomadic nature of the times, and the length of time this site was used, there will undoubtedly be burial grounds in this area.

It is obvious that there are other routes, which can be used to connect these major highways, and we hope that another will be selected.

Rob Porte  
Cultural Portfolio  
Georgina Island Council



Chippewas of Georgina Island  
R.R. #2, SUTTON WEST, ONTARIO  
L0E 1R0

Phone: (705) 437-1337

Fax: (705) 437-4597

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December 14, 1998

To Whom It may concern:

To further my letter of July 8/98, regarding the Bradford Bypass issue.

Georgina Island First Nation is opposed to any construction or development including road construction and archeological digs at the site known as Lower Holland Landing. We will continue to be opposed to anything that disturbs or destroys this ancient place. My reason not to call for a designation by Historical Sites Monuments Board is that these people may dig-up this site and open it up like a tourist attraction. This place must remain undisturbed. I assure you ~~we~~ will be opposed to this as long as it is considered an option.

Rob Porte  
Chippewas of Georgina Island

P.S. Ravenshoe Road in Keswick would be cost effective and cross less marsh land.