

**THE FORD / MULRONEY
BAIT & SWITCH SCAM**

Critical Update

October 10 2021

New information

The Province passed its proposed “exemption regulation” for the Bradford Bypass on October 1, effective October 7.¹

This regulation:

- Provides final EA Act approval for the Bradford Bypass.
- Removes, the conditions in the 2002 EA approval the most significant being the requirement for a Class EA Study and issuance of a Transportation Environmental Study Report (TESR) at the conclusion to obtain final approval.
- Elimination of the Class EA Study removes the requirement to consider reasonable alternative routes.
- The 15 environmental studies that MTO’s consultants told everyone they were doing now have no bearing on this project unless they are required to obtain a permit under legislation other than the Environmental Assessment Act.
- Elimination of the TESR removes the one remaining appeal right the public had concerning this project.

What does not appear to be addressed is the impact of the Lakes Simcoe Protection Act, (LSPA). MTO have consistently advised that they would be complying with this important environmental protection legislation for the Bradford Bypass. That Act permits highway infrastructure as long as it has Environmental Assessment Approval and reasonable alternative routes have been considered. It is questionable if the new exemption regulation can override the “reasonable alternative routes” requirement in the LSPA. This act came into effect long after the 1997 EA Study Report was issued and approved.

Having watched MTO’s presentation about all the environmental studies they are conducting and hearing MTO’s assurances that they are considering a wide variety of mitigation measures, Barrie council passed the following resolution:²

1. That, in accordance with the Lake Simcoe Protection Act, the City of Barrie requests that the Government of Ontario conduct a comprehensive impact assessment on Lake Simcoe and those vulnerable watersheds and inflows into Lake Simcoe and to identify considerations for alternate routes;
2. That a copy of this resolution be forwarded to the Provincial Minister of Transportation, Provincial Minister of the Environment, Conservation and Parks, all local MPPs and municipalities along the Lake Simcoe watershed along with a request for support.

Brock passed the same resolution on July 19th 2021

¹ <https://ero.ontario.ca/notice/019-1883>

² Barrie Council (May 31, 2021) (item 21 G 137)

Bottom Line:

This highway is a done deal. It's even the centerpiece of Ford's next election platform! The Throne Speech provides no other indication of what a Ford government will do for us if re-elected. Just give Ford a blank check to build two unnecessary, billion-dollar toll highways and trust him for everything else. Trust him as you did with his commitment to put an "iron ring" around the long term care system!³

This unnecessary, costly, environmentally destructive highway will be built unless local governments and the public say NO loudly enough that either:

1. Doug Ford realizes the health of Lake Simcoe is far more important than a Toll Highway through the center of Queensville, Bradford and the Holland Marsh and chooses a less environmentally sensitive highway corridor.

–or–

2. The public finally sees how he misrepresents the truth for his own political advantage and he gets thrown out of office at the next election because of his numerous governing failures.

During this pandemic, Doug Ford has insisted that he is listening to the medical experts. The public press indicate that this statement is only true when Ford does not disagree with the advice from these experts.

Local politicians have consistently been led to believe that Ford is also listening to his Engineering Expert, AECOM, the firm that is conducting the Bradford Bypass Class EAS. AECOM is doing what they are paid by the government to do. Build this highway here and now at any cost. The professionals Ford has obviously not listened to, or alternatively chosen to disregard are the Ontario Society of Professional Engineers.⁴ The Society's expert advice concerning the Bradford Bypass Class EA Study makes us wonder if AECOM has an ethical issue in doing the work they are doing for this project.

MTO responded to the Ontario Society of Professional Engineers article.⁵

The following statement in MTO's response evidences their continuing Bait & Switch Tactics:

"Building the Bradford Bypass is necessary to relieve existing congestion on local east-west local roads and to address the expected long-term travel demand in the area" [emphasis added]

³ https://www.thestar.com/opinion/letters_to_the_editors/2021/08/18/doug-fords-iron-ring-does-nothing-but-protect-the-government-and-corporations.html

⁴ <https://ospe.on.ca/advocacy/bradford-bypass-and-evidence-based-decision-making/>

⁵ <https://ospe.on.ca/advocacy/ontario-ministry-of-transportation-responds-to-ospes-bradford-bypass-concerns/>

This statement is contrary to the positions clearly stated by MTO in the 1997 EA Study Report on which 2002 EA approval was granted.

- MTO would **only address solutions within the Ministry's mandate,**
- MTO stressed that the **appropriate municipal government, not the Province is responsible for intra-municipal transportation.**
- **"The opportunity to relieve congestion and its effects, both now and in the future, is dependent on there being a viable alternative(s) which, on balance, has less impact on the environment."**⁶

Next Steps

Now it is clear that MTO will not consider reasonable alternatives because of the elimination of the Class EA Study where this was a requirement,

We recommend:

York Region and Simcoe County move forward expeditiously to conduct jointly sponsored environmental assessments covering solutions within their intra-municipal transportation mandate to:

- **Connect Ravenshoe Road to Simcoe line 13, and**
- **Connect Queensville Sideroad to Bradford's 8th Line via Hochreiter Rd and Bathurst St.**⁷

We also recommend that these regions and all their related municipal councils:

- **Request MTO reconsider alternative corridors for the Bradford Bypass south of Newmarket.**

These alternative corridors aside in favour of the current corridor in the original 1997 EA Study. Had the Lake Simcoe Protection Act been in effect at that time, the current corridor would have likely been set aside in favour of one of these corridors.

This is a requirement of the Lake Simcoe Protection Act. The fact that MTO says they will be complying with this act is yet another misrepresentation!

⁶ Ibid S2.3.2.1

⁷ TAB 7 <https://frogs.ca/wp-content/uploads/shared-files/TAB-7-Alternative-Routes.pdf>

Highway 400 - Highway 404
Extension Link (Bradford Bypass)
Class Environmental Assessment Study

THE FORD / MULRONEY
BAIT & SWITCH SCAM

Prepared By: C.W.D. Foster
Forbid Roads Over Green Spaces
October 1, 2021

Introduction

MTO's proposed Bradford Bypass has recently attracted a significant amount of public concern, much of which is beginning to emerge in East Gwillimbury. For the most part, prior to the public outcry concerning the province's proposed Hwy 413, East Gwillimbury residents were unaware of the concurrent Bradford Bypass EA Study and plan to build a 400 series controlled access highway through the center of Queensville and Bradford. This lack of knowledge is likely due to the extremely sparse coverage by our local paper, The East Gwillimbury Express. Public concern is now increasing as residents begin to appreciate what is being proposed. The Simcoe County Greenbelt Coalition and Save Lake Simcoe Coalition have done much to raise people's awareness of the likely impact of this 400 series highway. The Save Lake Simcoe Coalition's Fact Sheet provides a good overview of the environmental impact of this highway.¹

MTO has been going to some length to assure everyone, especially local councils, that this highway is desperately needed and that they are doing some 15 environmental studies to update this 1997 EA study which was approved, with conditions, in 2002. The storyline is that MTO are relying on this 24 year old Bradford Bypass EA Study to cut all the red tape associated with conducting a fresh Environmental Assessment. This is a deliberate communication strategy. Great emphasis is placed on communicating "feel good" reassuring messages while great lengths are concurrently taken to "salt" these broad messages with tidbits of uncomfortable truths. The objective is to be able to prove that the public was not wilfully misled with untruths should proof of this honesty ultimately become necessary in a proceeding such as a judicial review.

A prime example of this strategy concerns the Need and Justification for this EA approved Project. Need and Justification are fundamental tenants of all Environmental Assessments. The only reason EA approval can be granted is that the proponent must establish there is a significant need for their proposed project and that having reviewed all reasonable options, the need for the project clearly outweighs the post mitigation environmental impact of the project. Need and Justification are essentially brushed over in MTO's current Class EAS consultations.

The only specific current comments that come to mind about the need for this highway are the travel demand maps provided in the Bradford Bypass Public Information Center #1² and the statement that this \$850 Million,³ 16 km, controlled access highway, will save motorists up to 35 minutes in travel time between highways 400 and 404. Incidentally, the Toronto Board of Trade estimates the cost for this highway will end up at \$1.5 Billion.⁴

¹ TAB1 <https://frogs.ca/wp-content/uploads/shared-files/TAB-1-Rescue-Lake-Simcoe-Coalition-Fact-Sheet-Bradford-Bypass-1.pdf>

² <https://www.bradfordbypass.ca/2021/04/09/5-considerations-for-the-bradford-bypass-project/>

³ Mulroney statement to press: <https://www.innisfiltoday.ca/local-news/bradford-bypass-qa-with-minister-mulroney-3824080>

⁴ Toronto Board of Trade: https://www.bot.com/Portals/0/MOG_Rpt6_vFinal_Jan%2022.pdf

At whatever the cost, is 35 minutes of travel time savings really worth that much cost? Ontarians deserve a “value for money” analysis for this highway before giving Ford a blank cheque for this project.

A major condition of the original 2002, EA approval, is that detailed design for the highway must be conducted under the provisions of a protocol entitled: Class Environmental Assessment for Provincial Transportation Facilities - Approved by Order in Council 1653/99 on October 6, 1999 - as Amended July 14, 2000.⁵

Two of the major provisions of this protocol that relate to the Bradford Bypass EA study are:⁶

- Sections 4.4.2 – 4.4.4 Evaluate “Alternatives To” and Select the Preferred Transportation Undertaking.
- Section 6.2 Bump-Up or EA Challenge Principles and Administration.

The first sections specify the types of facilities that should be considered when identifying reasonable alternatives to the proposed undertaking while the Bump-up section is essentially the public’s right to appeal.

MTO is doing everything it can to remain within the 2002 EA approved route boundaries and alignment so as to not trigger the requirement to consider alternatives as set out in Sections 4.4.2 – 4.4.4 of the Class EA protocol. Their strategy is to rely upon the original approved route at almost any cost. They know that the original EA Study incorrectly / illegally excluded roadway alternatives that were not controlled access highways. If they now have to vary from this original approval, under the requirements of the current Class EA Protocol, they will be required to consider a wide range of reasonable alternatives including regional and local roads. This strategy might also permit MTO to sidestep the requirement under the Lake Simcoe Protection Act⁷ to consider reasonable alternative routes. Simply put, this highway would not be approved today given today’s facts and circumstances.

The province is even proposing a regulation to dispense with the conditions attached to the original 2002 EA approval so they can commence construction of items such as bridges before next year’s provincial election.⁸ This construction would be well underway before the above mentioned 15 new studies have been completed. Early construction is provided for in this year’s provincial budget. Our concern is that early construction will foreclose the possibility for any significant modifications to the currently approved project if subsequently deemed appropriate.

⁵ http://www.mto.gov.on.ca/documents/english/engineering/Class_EA_2000.pdf

⁶ TAB 2 https://frogs.ca/wp-content/uploads/shared-files/TAB-2-Excerpts-from-Class_EA_2000-2.pdf

⁷ Permitted infrastructure: Lake Simcoe Protection Plan – Mandatory policy - 6.23-DP Infrastructure, but only if the need for the project has been demonstrated through an Environmental Assessment or other similar environmental approval and there is no reasonable alternative.

⁸ TAB 3 <https://frogs.ca/wp-content/uploads/shared-files/TAB-3-Proposal-to-exempt-MTO-projects-from-the-requirements-of-the-EA-Act.- -Environmental-Registry-of-Ontario.pdf>

This proposed regulation will eliminate the requirement for MTO to complete the currently underway Class EA Study and at the conclusion, issue a Transportation Environmental Study Report (TESR). Elimination of the Class EA and TERSR will remove the public's appeal rights because Bump-Up Requests are triggered by and based on the TERSR. Elimination of the requirement for a Class EA Study will also permit MTO to build the highway based on the original EA Approval without further approval. MTO claim they will publish reports of the 15 environmental studies they are currently undertaking whether or not the proposed exemption regulation is passed. Except where required to obtain a permit under other provincial or federal legislation, if the exemption regulation is passed, these studies will have nothing more than informational value.

How did we get to where we are today?

The following traffic problems have existed as far back as the 70's:

- Out-of-the-way-travel between locations east and west of the Holland River north of Queensville Sideroad / Hwy 88 and south of Cooks Bay
- Traffic congestion in Bradford at the intersection of Hwy 88 and Hwy 11⁹
- Traffic congestion in Newmarket along Davis Drive¹⁰

To address these problems, MTO conducted a series of environmental assessments and consultations for a proposed connection of Hwy 89 with Ravenshoe Road immediately south of Cooks Bay. Their Highway 89 - Highway 400 to Highway 12 Route Location Study (1979), received substantial approval from the Ontario Environmental Assessment Board. The only outstanding issue was the board's requirement that MTO provide a detailed design for the crossing of the Keswick Marsh immediately south of Cooks Bay. Shortly before providing this detailed design to the board¹¹, fearing ongoing public backlash, the Minister of Transportation cancelled the hearing and withdrew the updated EA application. The board subsequently rescinded its EA approval for the entire project.

Local municipalities subsequently unsuccessfully petitioned the Minister to pursue the Hwy 89 project. Thereafter, MTO commissioned a new study: Highway 404 / 89 Overview Study (1989), to consider recommend transportation solutions *within MTO's mandate* for the entire South Lake Simcoe Basin. *[emphasis added]*

⁹ NOTE: the names of many of the highways listed in this letter have since been changed as a result of the downloading of responsibility for them to local / regional governments. The historic names for these highways are being used in this report to coincide with their names when these reports were originally published.

¹⁰ This problem has been addressed by the Green Lane upgrade and connection with Hwy 9.

¹¹ Highway 89 Extension Environmental Assessment Study (1984)

Cole Sherman, the report's author, recommended:

- Extension of Hwy 404 around the east side of Lake Simcoe to Gravenhurst.
- Construction of an east/west corridor, **as close to Cooks Bay as possible given environmental constraints, to minimize out of way travel, [emphasis added]**
- The new provincial highways should be planned and protected as controlled access highways.

Thereafter, in the early 90's, MTO commenced three Environmental Assessment Studies two of which were based on the recommendations of Cole Sherman's 1989 Highway 404 / 89 Overview Study . These studies were for:

- The extension of Hwy 404 to Ravenshoe Road,
- The Bradford Bypass,
- The upgrade of Green Lane with connection to Hwy 9.

The Hwy 404 and Green Lane proposals were approved and built.

The Green Lane EA study was prepared by McCormick Rankin, the same consultants that conducted the two Highway 89 studies and the Bradford Bypass EA study. The 404 Extension EA study was prepared by Cole Sherman, the consultants for the Highway 404 / 89 Overview Study.

The Green Lane Study was unique because it was initiated and paid for by the province in consideration of York Region agreeing to accept the downloading to it of responsibility for Hwy 9. When the study underwent Environmental Assessment Review by the Ministry of Environment, it encountered approval problems as the study clearly showed the proposed four lane regional road had insufficient capacity to handle projected travel demand. MTO resolved that problem by advising MOE the Bradford Bypass would absorb any traffic overflow problems. While these studies were underway, FROGS strongly recommended that the Green Lane project be upgraded to a controlled access highway rather than building the Bradford Bypass, a major parallel facility through an environmentally sensitive area only 8 km further north.

The Bradford Bypass EA Study Report was issued in December 1997 and approved, subject to conditions, in 2002. Other than protecting a 450 metre area on each side of the route centerline by filing restrictions against the titles of affected properties, no further action was taken with regard to this EA approved highway until 2017, when it was included in the Province's Places To Grow Plan. Thereafter, the province engaged AECOM, to fulfil the 2002 EA conditions of approval by undertaking the Bradford Bypass Class EA Study including 15 specified EA related studies.

Original Bradford Bypass EA Study.

This study was commenced with a draft Environmental Assessment Study Proposal in 1993. This proposal was subsequently withdrawn, substantially re-written and issued in

1994¹². It became the legal "terms of reference" for this EA Study once approved by the Minister of Environment.

As required by the Environmental Assessment Act, the proponent must first state one or more problems that the proponent is proposing to solve. The 1994 EA Proposal, (now the study terms of reference) identified the following problems: **[Emphasis added]**¹³

- **Traffic Problems - termination of provincial highways at lower-capacity municipal roadways** (e.g. Highway 9 at Davis Drive).
- **Road Discontinuities - Inefficient, out-of-the-way travel barrier to east-west travel formed by the lack of a crossing of the Holland River north of Highway 11 at Bradford.**
- **Lack of Long Term Plan** - the lack of a defined, approved long term highway network plan in the northern part of York Region and southern Simcoe County places constraints on the provincial and municipal planning process in the area.

In addition to addressing significantly different problems than addressed by the earlier EA studies, **the Bradford Bypass EA Study also included the following key limitations: [Emphasis added]**

- MTO would **only address solutions within the Ministry's mandate,**
- MTO stressed that the **appropriate municipal government, not the Province is responsible for intra-municipal transportation.**
- **More than just the proposed Bradford Bypass would probably be required to address area traffic problems - a combination of measures may be needed.**
- **"The current study will only deal with those elements of the total solution which fall under the MTO's proponenty or mandate.**
- Proponent reserves the right to seek approval for only selected facilities and to **set aside other facilities to be studied in detail at a later time *or by another proponent.*"**
- **"The opportunity to relieve congestion and its effects, both now and in the future, is dependent on there being a viable alternative(s) which, on balance, has less impact on the environment."¹⁴**

¹² TAB 4: ENVIRONMENTAL ASSESSMENT PROPOSAL - BRADFORD BYPASS \ HIGHWAY 400 TO HIGHWAY 404 EXTENSION ENVIRONMENTAL ASSESSMENT STUDY - SEPTEMBER, 1994
<https://frogs.ca/wp-content/uploads/shared-files/TAB-4-EA-Proposal-Sept-1994-compressed-annotated.pdf>

¹³ Ibid S2.1

¹⁴ Ibid S2.3.2.1

The Bradford Bypass final EA Study Report – Published December 1997 included a slightly enhanced list of problems:¹⁵

Traffic Problems - Traffic operational and distribution problems (e.g. too many traffic signals and commuters/recreational users being forced to use local roads resulting in a poor Level of Service for drivers) exist as a result of the incomplete and fragmented nature of the provincial highway system in the study area, **particularly with respect to the termination of provincial highways at lower-capacity municipal roadways (e.g. Highway 9 at Davis Drive and Highway 404 at Davis Drive in Newmarket).** [Emphasis added]

Road Discontinuities - Inefficient, out-of- the-way travel results from the presence of physical (e.g. the Holland River) and operational discontinuities (e.g. high speed function of Hwy. 88 west of Bradford, but low speed through Bradford with several traffic signals) in the major road network, particularly with respect to **the barrier to east-west travel formed by the lack of a crossing of the Holland River between Simcoe County Road 4 (Highway 11) at Bradford northerly to Lake Simcoe.** [Emphasis added]

Future Demand Growth Implications - The current transportation system (i.e. road/rail network) is not adequate in terms of both capacity (i.e. space for additional travellers) and location/orientation to accommodate future travel demand, particularly with respect to the significant growth in travel demand forecast for trips to, from, through and within northern York Region and southeastern Simcoe County.

Lack of Long Term Plan - The transportation and land use concepts of municipal Official Plans in the study area rely to a considerable extent on the presence of the provincial highway network; the lack of a defined, approved long term highway network plan in the northern part of York Region and southern Simcoe County places constraints on the provincial and municipal planning process in the area.

The Ford / Mulroney bait and switch scam:

Based on the statements from various local governments, it is apparent that these governments think the Bradford Bypass is just an upgraded solution to address the long standing out-of-the-way travel and Bradford congestion problems. MTO is content to allow everyone to continue to believe this myth. The fact is, however, MTO is now proposing to build a 16 km controlled access highway that will perpetuate the 15 km out- of- the- way travel problem and only possibly resolve some to Bradford's traffic congestion. These are no longer problems to be addressed by this new highway but now only a "possible opportunity" (or consequence) of the proposed controlled access highway.

¹⁵ HIGHWAY 400 - HIGHWAY 404 EXTENSION LINK (BRADFORD BYPASS)
ROUTE PLANNING and ENVIRONMENTAL ASSESSMENT STUDY - ENVIRONMENTAL
ASSESSMENT REPORT- December 1997 – Executive Summary – S E.2.1 Problems and Opportunities

Furthermore, in their PIC#1, MTO's consultants "re-wrote" the Problems being addressed to obfuscate the fact that the original problem no longer exists:

Traffic - Needs and Justification 2002 Approved EA¹⁶

Road Discontinuities

- Inefficient travel as a result of the presence of physical and operational discontinuities. **[Rewritten]**

Future Demand Growth Implications

- Current road / rail network is inadequate in terms of capacity and location to accommodate future demand. **[New]**

Lack of Long-Term Plan

- Lack of a defined, approved long-term highway network plan in northern York Region and southern Simcoe County places constraints on provincial and municipal planning process. **[New]**

Relieve Congestion

- Capacity issues identified for east-west travel through northern York Region and southern Simcoe County. **[Previously an opportunity dependent on there being a viable alternative(s)]**

The reader is encouraged to compare the above revised problem statements with the original, legally binding, problem statements:

- **Traffic Problems** - termination of provincial highways at lower-capacity municipal roadways (e.g. Highway 9 at Davis Drive).
- **Road Discontinuities** - Inefficient, out-of-the-way travel barrier to east-west travel formed by the lack of a crossing of the Holland River north of Highway 11 at Bradford.

It should also be noted that the 2041 travel demand maps displayed at the Bradford Bypass PIC #1,¹⁷ forecast significantly increased traffic volumes north and south of the Bradford Bypass on highways 400 and 404 respectively, if the Bradford Bypass is built. These maps also show only a moderate reduction of travel volumes through the center of Bradford on Simcoe Road 88 / Bridge St. with similar traffic volumes on the Bradford Bypass. This is most likely caused by out-of-the-way-travel immediately south of Cooks Bay. These traffic volumes would be resolved if Ravenshoe Rd were connected to Simcoe County Line 13.

¹⁶ Ibid - S.3.1.1

¹⁷ TAB 5 Bradford Bypass PIC 1. Slide 4 Traffic volume projection maps <https://frogs.ca/wp-content/uploads/shared-files/TAB-5-2041-Travel-Demand-Maps-from-PIC-1.pdf>

Current Status of Problems Addressed by the Bradford Bypass EA Study

Problem	Outcome
Traffic Problems - termination of provincial highways at lower-capacity municipal roadways (e.g. Highway 9 at Davis Drive).	Problems otherwise resolved. These highways are no longer a provincial mandate: both Hwy 9 and 88 are now regional roads. ¹⁸ The only remaining highway in this area with this problem is Hwy 89 which is well north of the study corridor.
Road Discontinuities - out-of-the-way travel - barrier to east-west travel - lack of a crossing of the Holland River north of Highway 11 at Bradford.	Proposed Bradford Bypass route perpetuates this problem due to its southern alignment. The 15km, out-of-the-way-travel problem remains. MTO refused to reconsider the Hwy 89 Extension area even as a 2 lane highway. ¹⁹
Future Demand Growth Implications	Cole Sherman Consultants forecast that most east-west crossings by commuters were to access the GTA. The bulk of this demand is now addressed by the Barrie GO train with all day 2-way service promised – construction to commence by 2023. ²⁰
Lack of Long Term Plan - the lack of a defined, approved long term highway network plan in the northern part of York Region and southern Simcoe County places constraints on the provincial and municipal planning process in the area.	No material planning constraints evidenced. Notwithstanding concerted lobbying, the Bradford Bypass was only included in the Province's Growth Plan for the Greater Golden Horseshoe in May 2017. ²¹
Opportunities	Outcome
Relieve Congestion - There is potential for an improved transportation system to relieve some roadways which are ... severely congested. Note: "The opportunity to relieve congestion and its effects, both now and in the future, is dependent on there being a viable alternative(s) which, on balance, has less impact on the environment." ⁸	The major congestion is at the intersection of Holland St (Hwy 88) and old Hwy 11. Queensville Sideroad is also heavily used at some times. This is primarily the result of out-of-the-way-travel between origins / destinations such as Innisfil and Keswick. This can be resolved by connecting Simcoe Road 11 with Ravenshoe Rd. This may be a provincial rather than regional responsibility because Hwy 89 is still a provincial highway.
Protect Property - The opportunity to define and protect an adequate property envelope for the - ultimate" transportation system before all feasible routes / corridors are committed to other uses or are developed is in many cases a vital part of a successful community plan.	This is only necessary if a new controlled access freeway route is needed. Following EA approval a form of easement of 450 metres on each side or the proposed highway centerline was registered against all properties along the approved route.




¹⁸ http://www.asphaltplanet.ca/ON/highway_9.htm , https://en.wikipedia.org/wiki/Ontario_Highway_88

¹⁹ TAB 6 <https://frogs.ca/wp-content/uploads/shared-files/TAB-6-Rationale-for-Setting-Aside-the-Highway-89-Ravenshoe-Road-Corridor.pdf>

²⁰ <https://www.metrolinx.com/en/greaterregion/projects/go-expansion.aspx>

²¹ https://en.wikipedia.org/wiki/Bradford_Bypass

Comparison of 16 km Bradford Bypass with other short 400 series highways²²

Number	Length (km)	Southern or western terminus	Northern or eastern terminus	Formed	Notes
 Highway 420	3.3	Regional Road 98 (Montrose Road)	US 62 at Canada–United States border on Rainbow Bridge in Niagara Falls	1941 ^[79]	
 Highway 409	5.6	Pearson Airport in Mississauga	Highway 401 in Toronto	1978 ^[73]	
 Highway 405	8.7	Queen Elizabeth Way – St. Catharines	I-190 at Canada–United States border on Queenston-Lewiston Bridge towards Lewiston, NY	1963 ^[21]	
 Highway 412	10.0	Highway 401 in Whitby	Highway 407 in Whitby	2016 ^[75]	Tolled highway; route number assigned February 5, 2015
 Highway 418	12.8	Highway 401 in Clarington	Highway 407 in Clarington	2019 ^[78]	Tolled highway; route number assigned February 5, 2015

²² https://en.wikipedia.org/wiki/400-series_highways

There are only five, 400 series highways as short, or shorter, than the Bradford Bypass. Two of these were commissioned in 2015 as toll highways. The non-toll highways have been in existence for over 43 to 80 years.

Toll highway

Given the nature of highways 412 and 418, and the expected high cost of building this highway through wetlands, it is extremely probable that, once built, the Bradford Bypass will be designated as a toll highway. The very fact that MTO's representatives, including Mulroney, refuse to provide a definitive answer, when asked if this will be a toll highway, is further evidence of this Bait and Switch scam.²³

- The bait is everyone's expectation that local traffic problems will be solved by this highway.
- The switch is that we will now get a tolled highway with attendant sprawl but still require additional municipal / regional roadways to solve our current traffic problems.

A high volume toll highway through East Gwillimbury and Bradford will not serve our residents or local farmers. Given the short average distance from their location to either Hwy 400 or Hwy 404, these travellers will almost invariably choose local non-tolled routes thus continuing to strain our inadequate local / regional roadways. Meanwhile, out-of-the-way-travellers will still have to travel an additional 15 km, the only difference being that they will now do this at faster speeds.

MTO is relying on induced demand to justify the need for this unnecessary highway. Competent planners now realize that new highways only produce sprawl and that sprawl is unsustainable. Today's planners are now calling for community-centric, transit supportive, development that has the least impact on climate change. East Gwillimbury's Official Plan follows these community centered principles. The Bradford Bypass is a major contradiction to the planning objectives set out in East Gwillimbury's Official Plan. Modern climate change management practices call for new highways to be avoided wherever possible.

Also, since the Bradford Bypass 1997 EAS was published, a very significant amount of its projected travel demand has been addressed by the Barrie Go Train. Prior to COVID 19, Metrolinx reported in excess of 3,000 person trips per day from the East Gwillimbury, Bradford and two Barrie Stations. This ridership will grow significantly in the next several years due to planned all day, 2-way, service and the recently announced proposed new station at Innisfil. The Barrie Go Train was not even considered as a possible alternative in the Bradford Bypass EAS.

²³ <https://thepointer.com/article/2021-07-02/we-can-t-keep-doing-this-pc-government-speeds-ahead-with-bradford-bypass-advocates-say-process-lacks-proper-scrutiny>

We encourage everyone who has any involvement with this project to carefully read and then reread the open letter from the Ontario Society of Professional Engineers concerning this highway.²⁴

The Bradford Bypass will not solve the significant issue of out-of-the-way-travel between Barrie / Innisfil and Keswick / Brechin. Connecting Ravenshoe Rd. to Line 13 is the best “regional mandate” solution for this out- of-the-way-travel. Whereas 25 years ago, this route would have traversed the Keswick marsh, as can be seen in the attached satellite map of proposed alternative routes, practically all of this land has now been converted into farmland.²⁵ When the original Bradford Bypass EAS was being conducted, Ontario’s Ministry of Natural Resources directed that any crossings of the marsh should be over previously disturbed land as much as possible. This route complies with MNR’s directive.

Once out-of-the-way-travel is addressed by a Ravenshoe Road connection, if necessary, any residual traffic congestion in Bradford can be addressed by building a regional road bridge to connect Queensville Sideroad to Bradford’s 8th Line via Hochreiter Rd and Bathurst St. This roadway expansion will more than double the east – west traffic capacity through Bradford while the Ravenshoe Road connection will dramatically reduce the volume of traffic on Yonge St (Highway 11).

There is no longer need nor justification for the Bradford Bypass. MTO is adamant that they will only address problems and solutions within their long distance travel mandate and jurisdiction. Given the downloading of Highways 9 and 88 to regional jurisdiction, the problem for which the Bradford Bypass received Environmental Assessment Approval, no longer exists. Highway 89, is the only remaining provincial highway in the entire study area and MTO refuses to consider an alternative route of any kind in this location.

The need to protect Lake Simcoe from toxic salt runoff and other containments far outweighs any requirement for a controlled access highway in this highly environmentally sensitive area.²⁶ If a connecting link between Highways 400 and 404 is still required, it can now, just as easily and more environmentally safely, be built further south between Newmarket and Aurora.

Section 3.5.2 of the 1997 Bradford Bypass EA Study addresses alternative corridors that were considered prior to settling on the Bradford Bypass Corridor. These corridors are shown on Exhibit E-5, of that Study. (This is the last map in TAB 7).

²⁴ <https://ospe.on.ca/advocacy/bradford-bypass-and-evidence-based-decision-making/>

²⁵ TAB 7 <https://frogs.ca/wp-content/uploads/shared-files/TAB-7-Alternative-Routes.pdf>

²⁶ Lake Simcoe Region Conservation Authority – Lake Simcoe Salt <https://www.lsrca.on.ca/watershed-health/salt>

“The Aurora / Newmarket corridor has the potential to perform a better transportation function than South Oak Ridges, as it is beyond the direct influence of Highway 407 and in the heart of a populated area. It would serve a slightly different market than the Bradford corridor: the “round lake Simcoe” trips via Highways 88, 9 and 11 would not use the route, while the greater number of long distance trips originating in the more heavily populated area south of Highway 9 would find this 400 - 404 link attractive. The net result is that both the Aurora-Newmarket and Bradford routes would serve similar volumes of long distance traffic. However, the Bradford corridor would serve all of the “round the lake” trips plus the same volume of longer trips, while long distance trips from south of Highway 9 would, in the absence of an Aurora / Newmarket route, still have Highway 407 and the Bradford route to use between 400 and 404. In terms of addressing the problems and opportunities identified in Section 3.1.1, the Aurora/Newmarket corridor fails to respond to the need for road network improvements north of the Highway 11 Holland River crossing, and consequently does not fully relieve Bradford and Newmarket of the impact of long distance provincial trips on the municipal street system and community.”

Based on the 2041 Travel volume maps provided at MTO’s PIC #1 we now know that out-of-the-way-travel issues south of Lake Simcoe will not be adequately addressed by the Bradford Bypass and a regional solution using Ravenshoe Road is necessary. When EXHIBIT 3-12, MTO’s Comparison of Alternative Freeway Corridors included with Section 3.5.2 is updated to include what are now one or more known important archaeological sites on the Bradford Bypass Corridor and adding the requirements of Lake Simcoe Protection Act, to the chart, scoring the result gives a preference of 3 for the Aurora Newmarket Corridor²⁷ over the Bradford Bypass Corridor.²⁸ Clearly this is now a very reasonable alternative corridor that should be considered by MTO.

Conclusion

The road discontinuities the Bradford Bypass set out solve are now a regional, rather than provincial, responsibility. These can and should be addressed by connecting Simcoe Road 11 with Ravenshoe Road. The area immediately adjacent to this crossing has been drained and is now farmland. This is the type of crossing location preferred by Ontario’s Ministry of Natural Resources when the original Bradford Bypass Environmental Assessment was undertaken. If further traffic congestion problems remain in the center of Bradford, these should be addressed by connecting Queensville Sideroad to Bradford’s 8th Line via Bathurst and Hochreiter Road. These are both regional responsibilities.

²⁷ The Aurora / Newmarket corridor is Shown on the 3rd page of TAB 7 as the Northern Outer Ring Road

²⁸ TAB 8 <https://frogs.ca/wp-content/uploads/shared-files/TAB-8-Corridor-Comparison-from-BB-EAS-1997.pdf>

What does all of this mean?

- The Bradford Bypass EA Approval is now spent (no longer valid) because it addresses Provincial Highway Discontinuities which no longer exist. Both Highways 9 and 88 are no longer under provincial jurisdiction.
- While MTO acknowledge other municipal solutions will be required, they are not considering these in the Bradford Bypass EA. This is contrary to the requirements of both the Environmental Assessment Act and Sections 4.4.2 – 4.4.4 (Evaluate “Alternatives To” and Select the Preferred Transportation Undertaking), of the Class EA, AECOM is currently conducting.
- The Lake Simcoe Protection Plan also requires this consideration of alternatives.
- MTO should be encouraged to reconsider a Hwy 89 / Ravenshoe Road two lane highway.
- Alternatively, if the province is adamant that it wants a controlled access Highway to connect Highway 400 to Highway 404, MTO should be encouraged to consider the significantly less environmentally sensitive Aurora / Newmarket corridor originally set aside in the 1997 Bradford Bypass EA Study.
- Now that the transportation problems addressed by the Bradford Bypass EA approved study no longer exist, there is no necessity to build a controlled access highway in this environmentally sensitive area.