December 9, 2021

Honourable Steven Guilbeault
Minister of the Environment and Climate Change Canada
Ottawa, Ontario, K1A 0A6

Sent by email to: ec.ministre-minister.ec@canada.ca

Dear Minister Guilbeault:

# Re: Bradford Bypass designation request - updates

Today we are writing to update further our request for the designation of the Bradford Bypass under s.9(1) of the Impact Assessment Act which we made on November 9, 2021. Since our designation request, there have been significant updates that speak to public concern about the Bypass. To ensure that your office has the most up to date information on which to make a designation decision, we are providing the following information:

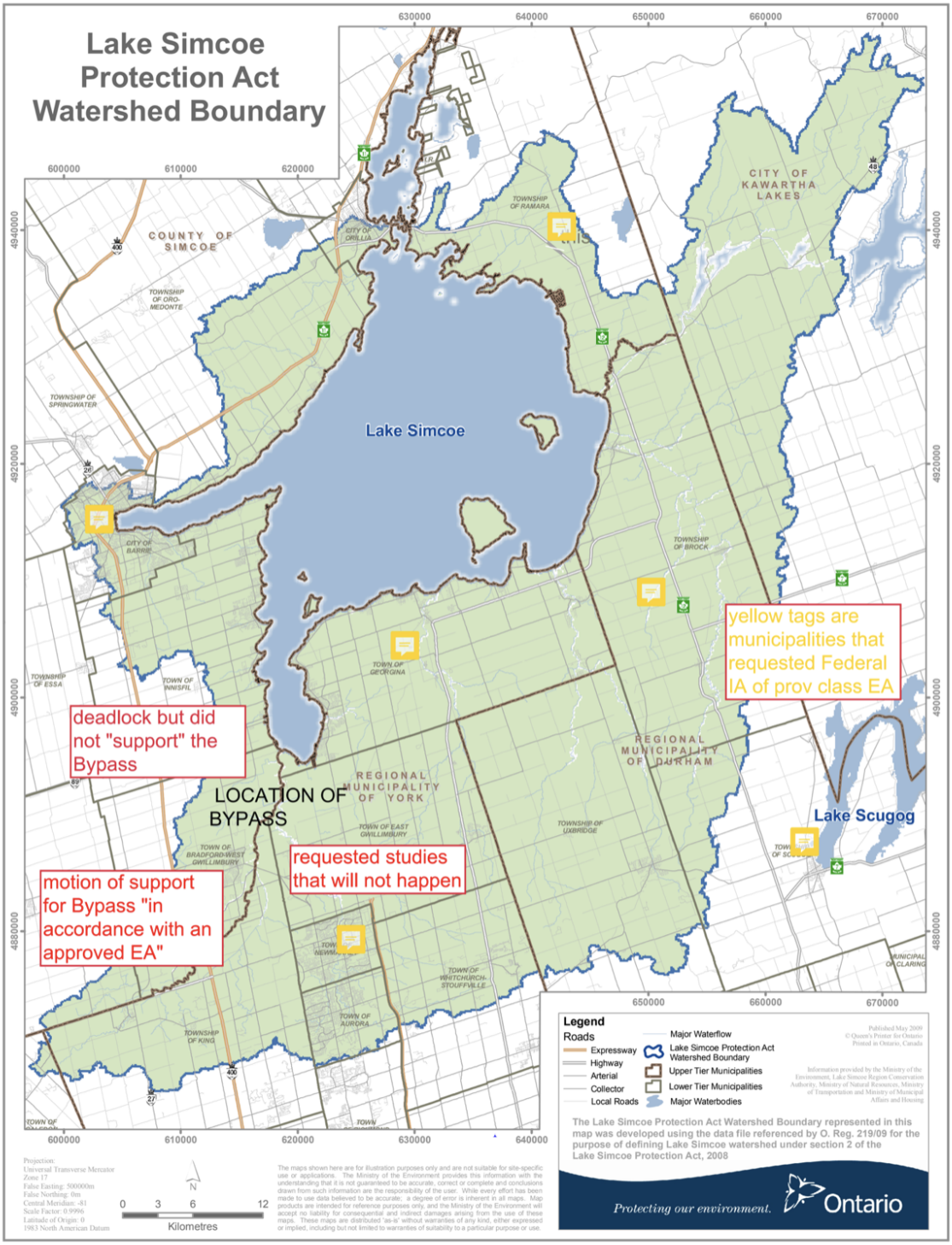
- Appendix 1 - A list of municipal council resolutions that support a Federal Impact Assessment or outline their desire for full environmental study;
- Appendix 2- Polling done within the area that demonstrates high level of opposition to the Bypass in key ridings around Lake Simcoe;
- Appendix 3 - Collection of media clips that have been earned since early November;
- Appendix 4 - List of the almost 10,000 signatories that have signed on to our petition to have the Bradford Bypass receive a Federal EA. This is in addition to the 18,000 people who supported the first designation request;
- Appendix 5 - A letter of support from 63 organizations across Ontario who believe that it is in the best interest of the public and environment to designate the Bradford Bypass.

We hope you find these updates useful in your assessment of the Bradford Bypass.

Bill Foster
Forbid Roads Over Green Spaces

# Appendix 1

Municipalities that requested Federal Impact Assessment or a complete provincial Class Environmental Assessment are tagged.



# Chronological municipal resolutions regarding the Bradford Bypass, 2021

Totals:

- **6 municipal requests for Impact Assessment** (Barrie, Newmarket, Brock, Scugog, Ramara, Adjala-Tosorontio);
- 1 municipal request for studies you would find in a full provincial Environmental Assessment which is moot since EAA exemption (Georgina);
- 2 - 3 municipal resolutions that support the Bradford Bypass with a list of studies that *if* done, will be under sole discretion of MTO, no outside commenting government agency nor any legislative threshold to demonstrate legitimacy of studies;
- 1 deadlock vote in a municipality that historically has supported the Bypass since conception (Innisfil).

Bradford West Gwillimbury letter to South Simcoe County municipalities:
May 4, 2021

Recommendation:

WHEREAS the Highway 400 – 404 Freeway Link is a proposed 16.2 kilometre, four-lane controlled access highway that will provide a critical east-west connection between Highway 400 in Simcoe County and Highway 404 in York Region; and

WHEREAS the Ministry of Transportation is carrying out detailed engineering and environmental studies as well as a public consultation program for the project in accordance with an approved Environmental Assessment; and

WHEREAS the Highway 400 – 404 Freeway Link project team maintains www.bradfordbypass.ca as a public resource for providing background information on the project and the status of work that is currently underway; and

WHEREAS the new highway will offer considerable benefit to the south Simcoe region as it will reduce congestion, improve the movements of goods and materials, and strengthen economic prosperity of the region.

NOW THEREFORE, BE IT RESOLVED THAT the Council of the Corporation of the Town of Innisfil hereby advises the Ministry of Transportation that the Town strongly supports the Hwy 400 – 404 Freeway Link and encourages the Ministry to proceed with the project following completion of the design and impact mitigation process.

2021.05.04 BWG Letter re Bradford By-pass

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**Town of Innisfil**
May 26, 2021

Did not pass a resolution, but also did not pass the resolution the Mayor wanted, in support of the Bypass. Tied vote, 4-4

View the delegation and debate: https://www.youtube.com/watch?v=vZZL5sX-IdQ at 47.52

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**City of Barrie**
May 31, 2021

https://barrie.legistar.com/MeetingDetail.aspx?ID=869805&GUID=40DE7EFB-4FB8-440E-81E8-EEBE602E797B&Options=info|&Search=

Item 21 G 137
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.

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**Township of Brock**
July 19th, 2021

https://pub-townshipofbrock.escribemeetings.com/Meeting.aspx?Id=ea33e194-cee3-47d4-883e-f11e3e59867b&Agenda=PostMinutes&lang=English

passed the same resolution as Barrie:

**Moved by**Regional Councillor Smith
**Seconded by**Councillor Campbell

That communication 984/21 - Rescue Lake Simcoe Coalition, regarding the Bradford Bypass and letter from Barrie, be received for information; and,

That in accordance with the Lake Simcoe Protection Act, the Township of Brock requests that the Government of Ontario conduct a **comprehensive impact**

**assessment** on Lake Simcoe and those vulnerable watersheds and inflows into Lake Simcoe and identify considerations for alternate routes; and,

That a copy of this resolution be forwarded to the Provincial Minister of Transportation, Provincial Minister of the Environment, Conservation and Parks, all local MPP's and municipalities along the Lake Simcoe watershed along with a request for support.

**CARRIED**

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**Georgina Council**
August 11th, 2021

https://pub-georgina.escribemeetings.com/Meeting.aspx?Id=6acf313b-1c7d-48b9-a482-a2301351972d&Agenda=PostMinutes&lang=English

passed unanimously:
9.2
Motion from Councillor Dave Neeson re: Bradford Bypass - Agenda item(s) 13(1)(b), 10(2), etc.

WHEREAS the Council of the Town of Georgina 2019-2022 Strategic Plan contains an action item to advocate for the Bradford Bypass and;

WHEREAS the Town of Georgina also contains pillars of its Strategic Plan which in part are to protect the health of Lake Simcoe while also growing our local economy and providing for a high quality of life which includes access to employment and economic activity and;

WHEREAS the Town of Georgina supports the need for the Bradford Bypass in principle and;

WHEREAS The Bradford Bypass project individual environmental assessment was approved on August 28, 2002 and as a condition of this approval (Condition 4 of the Notice of Approval), the design and construction of the highway became subject to the Ministry of Transportation Class Environmental Assessment (Class EA) and;

WHEREAS The Ministry of Transportation (MTO) is required to prepare a Transportation Environmental Study Report (TESR) for the preliminary design and a Design and Construction Report(s) (DCR) for the detailed design of the Bradford Bypass and;

WHEREAS the purpose of the TESR is to outline:
- the potential environmental impacts associated with the project;
- mitigation measures to address these impacts; and
- consultation that occurred during the development of the TESR and how the consultation changed the project to address concerns.

One or more DCR must be prepared to document development of detail design and other project implementation issues and;

WHEREAS the Province of Ontario is proposing a regulation which is currently posted on the Environmental Registry of Ontario to exempt this project from the requirements of the Environmental Assessment Act which imposed the following 15 conditions:

- Agricultural Impact Assessment;
- Air Quality Impact Assessment;
- Archaeological Assessment (Stages 2, 3, & 4, as required);
- Cultural Heritage Assessment;
- Drainage and Hydrology;
- Erosion and Sediment Control Risk Assessment;
- Fish and Fish Habitat Existing Conditions and Impact Assessment Report;
- Fluvial Geomorphology
- Groundwater Impact Assessment;
- Land Use and Property Impact Assessment;
- Noise and Vibration Impact Assessment;
- Preliminary Landscape Composition Plan;
- Snowdrift Assessment;
- Terrestrial Ecosystems Existing Conditions and Impact Assessment Report (including an assessment of vegetation and vegetation communities, wildlife and wildlife habitat, species at risk and designated natural areas); and,
- Waste and Excess Materials Management Plan.

WHEREAS the above referenced legislative exemption could remove appeal rights for any deficiencies found in the Class Assessment studies, and could further exempt the project from all of the above referenced 15 conditions and could ultimately permit “early works” such as bridges and utility relocation

NOW THEREFORE BE IT RESOLVED that the Council of the Town of Georgina hereby makes the following statements and requests:

1. That the Council of the Town of Georgina continues to support the need for the Bradford Bypass;

2. That the Council of the Town of Georgina requests the Province of Ontario completes all of the above required studies and assessments as laid out above and as per the notice of approval under the Environmental Assessment Act in 2002;

3. That the Council of the Town of Georgina requests that the Government of Ontario commits to publicly releasing all studies and assessments;

4. That the Council of the Town of Georgina requests that the Government of Ontario remove the exemption authority to not comply with the conditions listed above as per the approval under the Environmental Assessment Act;

5. That the Council of the Town of Georgina requests that the Government of Ontario commit to involving the Lake Simcoe Region Conservation Authority for voluntary project review as permitted by the Conservation Authorities Act;

6. That a copy of this resolution be sent to all Lake Simcoe Region members of Provincial Parliament and the Premier of Ontario.

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October, 2021: **Ontario passes exemption regulation for the Bradford Bypass**

https://ero.ontario.ca/notice/019-1883#decision-details
“As part of the EA modernization efforts, we are exempting by regulation the Bradford Bypass project from the EAA, subject to conditions.”

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**East Gwillimbury Council**
Nov 16, 2021

https://eastgwillimbury.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=1409

AGENDA ITEM # M. 2.

Attachment No. 1
WHEREAS the proposed Bradford Bypass is a key priority project providing 16.2 km of new freeway extending from Highway 400 in Bradford West Gwillimbury, crossing through a small portion of King Township, and connecting to Highway 404 in East Gwillimbury;

AND WHEREAS the Province has announced that the Bradford Bypass will not be a toll freeway;
AND WHEREAS York Region's Municipal Comprehensive Review has recently confirmed that 70% of the Town's Whitebelt Lands will be included within the Town's Urban Boundary;
AND WHEREAS a proportion of these Whitebelt Lands are adjacent to the proposed Bradford Bypass and will form a new key employment corridor, which aligns with the Province's A Place to Grow: Growth Plan for the Greater Golden Horseshoe, the Town's Strategic Plan and will support growth through to 2051 for the community;
AND WHEREAS York Region's proposed Upper York Sewage Solution schedule aligns closely with the implementation of the Bradford Bypass;
AND WHEREAS the alternative designs for each component of the Bradford Bypass project will be generated and evaluated, within the updated Study Area, based on technical and environmental factors, and through engagement with Indigenous Communities, public stakeholders, municipalities, and government agencies.
NOW THEREFORE BE IT RESOLVED THAT, the Municipal Council of the Town of East Gwillimbury enacts as follows:
1. THAT the Ministry of Transportation consider the following comments on the Bradford Bypass Environmental Assessment project:
a. Ministry staff are requested to conduct direct and frequent communication and consultation with the Town;
b. Preliminary study findings are requested to be made available now or in the near future to help substantiate project impacts and benefits including and not limited to:
i. Diverting traffic and commercial vehicle volumes from the adjacent road network.
ii. Estimating the reduction in vehicular accident frequencies on the adjacent road network.
iii. Estimating the overall reduction in traffic delay/congestion on the adjacent road network and associated GHG emissions.
iv. Identifying and assessing the environmental impacts to the physical environment.
v. Estimating the impact on travel times for users of the highway and on the adjacent road network.
c. Adding an additional Public Information Centre(s) beyond the two within the current project's schedule;
d. Enacting a robust public communications strategy;
e. Considering adding or moving an interchange at 2nd Concession Road;
f. Reviewing and addressing traffic and operating impacts to the adjacent transportation system, specifically at Highway 11 and Bathurst Street.

2. AND THAT the Environmental Assessment process currently underway, include extensive study, evaluation and appropriate mitigation of and not necessarily limited to:

a. Agricultural Impact Assessment
b. Air Quality Impact Assessment
c. Archaeological Assessment
d. Drainage and Hydrology
e. Erosion and Sediment Control Risk Assessment
f. Fish and Fish Habitat Existing Conditions and Impact Assessment Report
g. Fluvial Geomorphology
h. Groundwater Impact Assessment
i. Land Use and Property Impact Assessment
j. Noise and Vibration Impact Assessment
k. Preliminary Landscape Composition Plan
l. Snowdrift Assessment
m. Terrestrial Ecosystems Existing Conditions and Impact Assessment
n. Waste and Excess Materials Management Plan
o. Human Health
p. Traffic Assessment and Impacts

AGENDA ITEM # M. 2.

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**Township of Ramara**
November 22, 2021

https://ramara.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=448

Item 9.5 Passed unanimously:

Motion:
That we support the SCGC correspondence dated November 16, 2021 regarding updates on the Bradford Bypass;
and that we support the request for the Federal Impact Assessment;
and that we request a traffic survey to be completed;
and that Premier Ford and MPP Jill Dunlop be so advised;
We will send copy of Brock, Georgina and Innisfil that we are supporting what is in the letter.

Moved by Councillor Heatherington and seconded by Councillor Fisher

All in favor, no objections, motion carried.

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**Township of Scugog**
Nov 29, 2021

https://pub-scugog.escribemeetings.com/Meeting.aspx?Id=dee30834-6441-4c2d-96e5-b1393ec8f862&Agenda=PostMinutes&lang=English

**Resolution**CR-2021-323
**Moved by:** Councillor Kiezebrink
**Seconded by:** Councillor Wotten
THAT the correspondence from Simcoe County Greenbelt Coalition, regarding Updates on Bradford Bypass, be received;

THAT the Township of Scugog Council ask the Impact Assessment Agency of Canada to complete a Federal Impact Assessment for the Bradford Bypass project, and

THAT this resolution be forwarded to All Lake Simcoe Watershed Municipalities.

—----------

**Town of Newmarket**
December 6, 2021

https://www.newmarket.ca/TownGovernment/Pages/Council%20Meetings/Agendas,-Minutes-and-Meetings.aspx

Whereas the existing Environmental Assessment for the Bradford Bypass was completed in 1997 and is more than 23 years old and was completed prior to the existence of the Greenbelt and the Lake Simcoe Protection Act;
Be it resolved,

1. That the Council of the Town of Newmarket requests the Province of Ontario conduct an updated Class Environmental Assessment for the Bradford Bypass; and
2. That in the absence of a new Provincial Class Environmental Assessment, that the Town of Newmarket requests the Impact Assessment Agency of Canada complete a Federal Impact Assessment for the Bradford Bypass Project; and,
3. That a copy of this motion be forwarded to the Provincial Minister of Transportation, provincial Minister of the Environment, Conservation and pars, MPs, MPPs and municipalities in the Lake Simcoe watershed, the Lake Simcoe Region Conservation Authority, and the Association of Ontario Municipalities.

**Adjala Tosorontio**
May 12, 2021

https://adjala-tosorontio.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=215

10.19. Highway 400 - 404 Freeway Link

**Moved by** Councillor Bays
**Seconded by** Deputy Mayor Meadows

Whereas the Bradford Bypass constitutes a 16 km highway predominantly over marshland, which was destined for an update of 15 crucial 25 year old environmental studies; and,

Whereas on October 7th 2021 a decision was passed to exempt the Bypass from these studies or review by agencies such as the MOECP; and

Whereas so many environmental, climate, and growth changes have occurred in the area in the last 25 years; and

Whereas in their 2021 Federal Budget, the Government has created the “Net Zero Accelerator Initiative” to help support “A Healthy Environment and Healthy Economy Plan” to aid in transforming the economy for clean and long term growth; and

Therefore be it resolved that the Township of Adjala-Tosorontio Council ask the Impact Assessment Agency of Canada to complete a Federal Impact Assessment for the Bradford Bypass project; and further,

That this resolution be forwarded in a letter to all Lake Simcoe Watershed Municipalities.

| **RESULT:** | **CARRIED.** |
|---|---|

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# Appendix 2

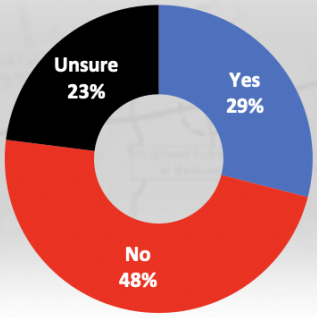
Polling done on the Bradford Bypass by Lake Simcoe Watch
Source: https://lakesimcoewatch.ca/wp-content/uploads/2021/11/LSW-Report-Nov-2021.pdf

## Support for Holland Marsh Highway

Prior to the next probe, another short statement was read about the plan to build the Holland Marsh Highway. Respondents were then asked if they support its construction.

*"The government of Ontario is planning to build a 16 km, four-lane Holland Marsh Highway to link Highways 400 and 404. The proposed highway would increase phosphorous and road salt pollution to Lake Simcoe, endanger fish spawning habitat, eliminate 23 acres of provincially significant wetland, and eliminate 81 acres of wildlife habitat."*

*Q3. Do you support construction of this highway?*




**Those responding yes (29%, N=262) were asked Q4. Residents responding no (48%, N=435) or unsure (23%, N=203) skipped to Q5.**

| | Yes | No | Unsure |
|---|---|---|---|
| York Simcoe | 37% | 41% | 22% |
| Barrie Innisfil | 26% | 45% | 29% |
| Barrie Springwater | 24% | 59% | 17% |

| | Yes | No | Unsure |
|---|---|---|---|
| NDP | 3% | 82% | 15% |
| Green | | 100% | |
| Liberal | 5% | 72% | 23% |
| PC | 60% | 21% | 19% |
| Undecided | 20% | 34% | 47% |

Opposition to the highway is 48% while 29% support the plan and 23% are unsure.

Resistance to the construction is highest among Green, NDP and Liberal voters, while six in ten PCs support it.

Those most opposed tended to be younger 18-29 (71%), 30-39 (65%) and 40-40 (46%), those earning under $100,000 per annum (under $50,000 – 63%, $50,000 – $74,999 (54%) and $75,000 - $99,999 (58%). More females (52%) in relation to males (45%) are opposed.

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# Appendix 3 - Media clippings

**December 6, 2021 - Innisfiltoday.ca: Newmarket asks province to take new environmental look at Bradford Bypass.**

**December 2, 2021 – OrilliaMatters.com: Auditor General's findings underscore Bradford Bypass concerns: Coalitions**

**November 29, 2021 - Toronto Star: Premier 'rewriting' rules, obstructing oversight on Bradford Bypass: Greens**

**November 22, 2021 - Ford's support for Bradford Bypass is not based on science, reader says**

**November 15, 2021 - Global News: GTA communities pushback proposed highway projects**

**November 14, 2021 - Newmarket Today: Environmentalists, residents join forces to protest Bradford Bypass, Highway 413**

**November 13, 2021 - Barrie CTV News: Over 100 protest Bradford Bypass outside transportation minister's office**

**November 13, 2021 - The Pointer: Will Doug Ford's highway gift to developers cost him a majority government?**

**November 13, 2021 - Barrie360: Opponents of Bradford Bypass demand Greenbelt over asphalt**

**November 13, 2021 - CityNews: Rallies held across GTA opposing Highway 413, Bradford Bypass**

**November 12, 2021 - Globe and Mail: Ford government bets big on Highway 413, Bradford Bypass**

**November 11, 2021 - iPolitics: The Uncertain Future of the Bradford Bypass**

**November 10, 2021 - BradfordToday: Citizen groups calling for impact assessment on Bradford Bypass**

**November 8, 2021 - CP24: New 'Bradford Bypass' highway won't be tolled, still no details on cost**

**November 8, 2021 - Global News: Ford government doubles-down on controversial Bradford Bypass**

**November 8, 2021 - The Narwhal: Everything you need to know about Doug Ford's controversial plans for new highways in Ontario**

**November 8, 2021 - Toronto Star: Doug Ford says Ontario taxpayers will bankroll the toll-free Bradford Bypass**

**November 8, 2021 - CBC: Ford says Ontario will foot the bill for the Bradford Bypass - but it hasn't been fully costed yet**

**November 4, 2021 - Ontario's commitment to building Bradford Bypass met with mixed reviews**

**November 3, 2021 - Toronto Star: NDP MPP calls on integrity commissioner to probe Premier Ford and cabinet members over Bradford Bypass decision making**

**November 2, 2021 - Queen's Park Today: PCs bet their re-election on highways and infrastructure as heat turns up on Bradford Bypass project**

**October 31, 2021 – Toronto Star: What the Ford government hasn't told you about its next controversial highway project**

**October 31, 2021 - National Observer: How Bradford Bypass became a pork barrel for Doug Ford's rich developer donors**

**October 12, 2021 - Bradford Today: Residents concerned by province's decision on Bradford Bypass project**

**October 12, 2021 – TheStar.com: Lake Simcoe environmental groups concerned after province grants Bradford Bypass exemption**

**October 11, 2021 – YorkRegion.com: Lake Simcoe environmental groups concerned after province grants Bradford Bypass exemption**

**October 08, 2021 – OrilliaMatters.com: 'Disturbing trend': Environmental groups condemn decision to exempt Bradford bypass from assessment**

**August 31, 2021 – Global News: What's needed from Canada's federal parties to help save Ontario's Lake Simcoe**

**August 25, 2021 – Marc Mitanis: Understanding the Impacts (re. the Bradford Bypass). Posted with permission of the publisher of NRU Publishing Inc. Original article first appeared in Novae Res Urbis – GTHA, Vol. 24, No. 33, Wednesday, August 25, 2021**

**August 16, 2021 - Georgina Advocate: What's the Bradford Bypass and why should Georgina residents care?**

**July 27, 2021 – YorkRegion.com: 'No more highways': Greenbelt groups protest Bradford Bypass outside Caroline Mulroney's office**

**July 25, 2021 – BradfordToday.ca: Environmental group takes Bradford Bypass protest to Mulroney's office**

**July 13, 2021 – Orillia Matters: Province shows 'no regard for health' of Lake Simcoe, group says**

**July 2, 2021 – The Pointer: 'We can't keep doing this: PC government speeds ahead with Bradford Bypass; advocates say process lacks scrutiny**

**June 21, 2021 - Rabble: Doug Ford's contentious Bradford Bypass**

**June 7, 2021 - Ontario Construction News: Municipalities unsure about supporting Bradford Bypass**

**May 27, 2021 - Innisfil Today: Innisfil Council split on the Bradford Bypass**

**April 13, 2021 - National Observer: Bradford Bypass: Ford's other highway through the Greenbelt.**

**February 6, 2021 - CBC: Ford government's plan for building new highway puts Holland Marsh at risk, critics say.**

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# Appendix 4

Over 9200 signatories as of November 9th, 2021 List of signatories of change.org petition

Petition source (still active): https://www.change.org/p/stop-the-bradford-bypass

Petition landing page text:

TAKE ACTION: **Tell the federal government they need to do a proper environmental assessment on the Bradford Bypass**. The Province has exempted itself from due process which means the only way this highway will get proper scrutiny and environmental studies is if the federal government steps in.

The Ontario government has recklessly revived a long-dead proposal for a new 400-series highway, the Bradford Bypass, which would carve through the Holland Marsh and slice up sections of farmland and the Greenbelt in order to connect highways 400 and 404.

The new highway would cost billions of dollars, have devastating impacts on the forests, farms, wetlands, rivers and communities that they bulldoze through, threaten endangered species, and the health of residents, not to mention exploiting a section of Federal Crown Land and destroying a significant archaeological site.

Worse, the project is going ahead based on a 24 year old Environmental Assessment, which is drastically, dangerously outdated. The province has passed exemptions to the updates they are required to complete, AND they want to start building "early works" before environmental assessment updates are complete or made public.

Without completing a current Environmental Assessment, we won't even know the scale of the damage they will cause until it's too late. We cannot accept the approach of building now and worrying about impacts later, especially when people's water, climate, and health is on the line.

With the Environmental Assessment Act exemption, the province has essentially approved this highway despite the out of date studies and no updated studies completed. More local municipalities are outlining their concern for Lake Simcoe and how this highway will pollute it, but we need public pressure to get the province to do the right thing and ensure all of the EA studies are done and updated.

Let's re-think the Holland Marsh Highway, and at the very least, ensure a complete, transparent, and up-to-date Environmental Assessment and public consultation process take place. We are in the middle of a climate crisis, in a global pandemic. Health > Highways.

**Take action now to write to Steven Guilbeault, Federal Minister of Environment and Climate Change Canada, asking him to designate the Bradford Bypass for a federal environmental study.**

# Appendix 5

**63 organizations** have supported our request to designate the Bypass for a Federal Assessment - letter embedded below

December 8, 2021

Honourable Steven Guilbeault
Minister of the Environment and Climate Change Canada
Ottawa, Ontario, K1A 0A6

Sent by email to: ec.ministre-minister.ec@canada.ca

Dear Minister Guilbeault:

**Re: Bradford Bypass designation request**

We are 63 environmental, farm and community organizations, many of which supported the February 3, 2021 designation request for a federal impact assessment of the Bradford Bypass highway (400-404 extension link) under the *Impact Assessment Act*. We are writing to indicate our support for the November 9, 2021 designation request made by three local community groups: Forbid Roads Over Green Spaces, Stop the Bradford Bypass and Concerned Citizens of King Township. Like them, we believe the proposed highway will result in adverse social and environmental impacts within federal jurisdiction.

In an era of devastating climate change and accelerating biodiversity loss, we are counting on the Government of Canada to intervene in provincial decisions that would increase greenhouse gas emissions from transportation and negatively impact fish habitat and species at risk. The Bradford Bypass will do exactly that, with serious and irreversible effects on Lake Simcoe and Ontario's climate. It will also lead to the loss of farmland in the Holland Marsh, an irreplaceable and finite resource and an issue of significant public concern.

As noted by the three community groups in their designation request, the Ontario Cabinet passed a regulation on October 7, 2021 fully approving the Bradford Bypass and exempting it from Ontario's *Environmental Assessment Act*. The project is thus set to proceed with minimal consultation, no consideration of alternatives to the highway, and limited studies that will have no impact on whether the project goes forward. The Province's construction timeline indicates that construction will begin before these studies are even released – despite several municipal requests for a comprehensive assessment of the impacts on Lake Simcoe and associated watersheds.

We agree with the local residents that alternatives to the Bradford Bypass, which have potentially much lower negative impacts on climate and biodiversity, have not been duly considered. The fundamental premise of the Bradford Bypass project is that compact, transit supportive complete communities are not possible, and that everyone moving to the Lake Simcoe region in the future will be driving in single occupant vehicles. This is not a vision supported by most Canadians. In light of the promises made at COP26, we are counting on the Government of Canada to take meaningful steps to fulfill its obligations and responsibilities. Since transportation emissions are the largest source of greenhouse gas emissions in Ontario, designating the Bradford Bypass for a federal impact assessment would send a strong signal about your government's intent to put its climate commitments into action, without delay.

Designating the Bradford Bypass for an impact assessment would also show that Canada is committed to protecting fisheries and species at risk, two other important areas of federal jurisdiction. It would demonstrate a precautionary approach to decision-making and a

impacts of a dramatic increase in impervious surfaces (pavement) as a result of the highway. These include the loss of habitat and farmland as well as the contamination of nearby waterbodies such as the Holland Marsh Provincially Significant Wetland from stormwater runoff, wastewater discharge and spills.

An impact assessment would also ensure that species at risk and their habitats are properly considered. One such species is the Red-headed Woodpecker, assessed as Endangered in 2018 by the Committee on the Status of Endangered Wildlife in Canada. There is mapped critical habitat for this at-risk species along the proposed route for the Bradford Bypass, and yet Ontario's exemption regulation allows habitat destruction to be authorized without public consultation and before environmental studies are completed.

As outlined in the designation request submitted on November 9th, local residents have identified several alternatives to the proposed highway which merit consideration and could open the door to a better, more sustainable future in the region. Given federal obligations and responsibilities with regard to climate change, fisheries and species at risk, we urge you to intervene and compel the Province of Ontario to consider alternatives to the Bradford Bypass through a federal impact assessment.

Thank you for your consideration. We look forward to your response.

Yours sincerely,

***Caroline Schultz***
*Executive Director*
Ontario Nature

***Margaret Prophet***
*Executive Director*
Simcoe County Greenbelt Coalition

***Claire Malcolmson***
*Executive Director*
Rescue Lake Simcoe

***Don Morgan***
*Chair*
AWARE Simcoe

***Peter Lavoie***
*President*
Barrillia Park Ratepayers' Association

***Gregor Beck***
*Ontario Director*
Birds Canada

***Norman Wingrove***
*Acting President & Treasurer*
Blue Mountain Watershed Trust

***Tom Wilson***
*President*
Carden Field Naturalists

***Janet Budgell***
*Chair*
Concerned Citizens in Adjala-Tosorontio Inc.

***Mike Douglas***
*Chair*
Concerned Citizens of Ramara

***Sheena Sharp***
*President*
Coolearth Architecture Inc.

***Janet Sumner***
*Executive Director*
Wildlands League

***Rachel Plotkin***
*Boreal Program Manager*
David Suzuki Foundation

***Franz Hartmann***
*Executive Director*
Earthroots

***Jackie Ho***
*Co-chair*
Emerging Leaders for Biodiversity

***Alyssa Wright***
*Chair*
Engage Barrie Organization

***Tim Gray***
*Executive Director*
Environmental Defence

***Lynda Lukasik***
*Executive Director*
Environment Hamilton

***Michael Mesure***
*Executive Director*
FLAP Canada

***Brian Bell***
*Chair*
Food and Water First

***Naomi Saunders***
Friends of Minesing Wetland

***Wioletta Walancik***
*Administrative & Programs Director*
Friends of Second Marsh

***Mary Wagner***
*Chair*
Friends of Simcoe Forests Inc.

***Pam Fulford***
*Chair*
Friends of Strawberry Island

***Jim Robb***
*General Manager*
Friends of the Rouge Watershed

***Karen Yukich & Sharon Lovett***
*Co-chairs*
High Park Nature

***Eric Davis***
*Board Member*
Kawartha Field Naturalists

***Jack Gibbons***
*Chair*
Lake Simcoe Watch

***Mary Delaney***
*Chair*
Land Over Landings

***Sandy Buxton***
*President*
Midhurst Ratepayers' Association

***Susan Hirst***
*President*
Midland-Penetanguishene Field Naturalists Club

***Sheila Mazur***
*President*
Mycological Society of Toronto

***Don Ciparis***
*President*
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