

September 1, 2021

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Public Works

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Re: Proposed regulation updates to environmental assessment requirements for transmission lines (ERO #019-3937)

Ms. Renwick:

Regional staff appreciate the opportunity to review and comment on the details regarding the proposed regulation updates to the thresholds that determine the type of environmental assessment process required for establishing a transmission line as outlined in ERO Posting # 019-3937. The following represent comments from Region of Peel staff.

Background

The Region of Peel has been participating in and providing comments to the Independent Electricity System Operator (IESO) as part of their Integrated Regional Resource Plan update for the GTA West region. As well, the Region has also been providing comments on the co-located GTA West Transportation Corridor Environmental Assessment (EA).

Please note that on March 11, 2021, Regional Council approved the following resolution regarding the GTA West Transportation Corridor and the Northwest Greater Toronto Area Transmission Corridor (Resolution 2021-291 – full copy attached):

Therefore be it resolved, that the Council of the Region of Peel approve the following:

- *Strong opposition to any and all advanced construction associated with preparations for a GTA West highway and Transmission Corridor*
- *Strong opposition in principle to construction of any transportation corridor traversing the Region of Peel, but specifically the currently proposed GTA West 413 highway and Transmission corridor which will wreak havoc on the environment, encourage residential sprawl and dependence on the car as a significant means of transportation.*

General Comments

The Ministry's proposal to change the voltage and distance thresholds for new transmission lines that require a comprehensive (individual) environmental assessment is not consistent with Regional Council's position as noted above if the proposal results in reducing the EA process requirements for new transmission line projects within the Northwest GTA Transmission Corridor.

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The Ministry's proposed new thresholds (i.e. transmission lines 75 km or longer in length and having a voltage of 345 kV or greater) would potentially enable large projects below the new thresholds that are currently subject to comprehensive EA requirements to now follow the Class EA for Minor Transmission Facilities (Class EA) (e.g. projects >50 km and above the voltage threshold).

The Independent Electricity System Operator (IESO) is conducting the Northwest GTA Transmission Corridor Identification Study to identify a corridor that will accommodate the construction of a new transmission line for the Northwest GTA Region, a large portion of which is in Peel Region. Depending on how the transmission line project is scoped, the expected length and voltage of the line would potentially exceed the thresholds for designation under the existing Class EA for Minor Transmission Facilities (i.e. > 50 km but less than 75 km with two new double circuit 230 kV transmission lines). The reclassification of large transmission line projects such as the Northwest GTA Transmission Corridor under the EA Act is inconsistent with the position as adopted by Regional Council if the new thresholds would allow a reduced EA process for the project.

Should the Northwest GTA Transmission Corridor proceed to the EA stage, we are seeking clarification as to whether the project will be proceeding in accordance with the more streamlined Class EA requirements as this project will potentially have significant environmental impacts and require careful planning and design in order to avoid, minimize, and mitigate impacts to the greatest extent possible.

Thank you for the opportunity to comment on the proposed updates to the regulation on environmental assessment requirements for transmission lines. Regional staff are available to answer any questions you may have.

Sincerely,



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Resolution Number 2021-291 Approved by Regional Council on March 11, 2021

Whereas tens of thousands of jobs and billions in agriculture-related economic activity are at risk if the proposed construction of the GTA West Highway (413) is approved;

And whereas, Ontario farming and food processing together employ one million persons and generate \$35 billion annually, the Golden Horseshoe being the third largest agricultural producer in North America after California and Chicago;

And whereas, the proposed Hwy 413 will slash a broad 52 km swath through agricultural, natural heritage and environmentally sensitive lands - bisecting 85 streams (10 of which are ecologically high priority) destroying seven entire wood lots including a 5.95 km length of forest, significantly fragmenting valley lands, disrupting 1,000 ha of land significant to wildlife movement - making serious incursions into areas protected under the Green Belt Plan;

And whereas, the 413 project would create 8.8 million square metres of highway and transitway right of way including paved surfaces (880 hectares/2174 acres), the equivalent of 13.59 functioning Ontario farms without consideration of the co-located Northwest Greater Toronto Area Electricity Transmission Corridor (transmission corridor);

And whereas, the 413 project will include a minimum of 60 metre right of way for an adjoining transitway, in addition to 110 metre highway right of way along with a co-located transmission corridor to support the sprawling employment buildings and residential subdivisions that will follow the highway;

And whereas, a significant number of reputable organizations have demanded the cancellation of the project, including: Environmental Defence, the David Suzuki Foundation, the Federation of Urban Neighbourhoods, Gravelwatch, Halton Environmental Network, National Farmers' Union-Ontario Rescue Lake Simcoe Coalition, Sustainable Vaughan, Transport Action Ontario, the Wilderness Committee and Sustainable Mississauga; as well as formal votes from the municipalities of Halton Hills and Orangeville;

And whereas, Environmental Defence has filed a request for designation under Section 9 of the Federal Impact Assessment Act requesting the GTA West proposed project and associated Transmission Corridor to be considered within federal jurisdiction by way of it's meeting the criteria for public concern, particularly since the Province is proposing a shortened EA process as well as the construction of bridges and other significant environmental disrupters in advance of the completion of the EA process;

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And whereas, the 3 year EA undertaken by the previous provincial government was shelved because of strong objection to the 413 by experts in the fields of rural development, renewable cities, agriculture, environment and efficient transportation who sounded alarms over predicted irreversible ecological harm caused by the uncontrolled, low density urban sprawl the 413 would cause;

And whereas, the EA process was halted by the previous government and a three person expert panel was appointed that unanimously recommended the cancellation of the GTA West Highway 413, a recommendation that resulted in the project's termination;

And whereas, the Region of Peel is currently undertaking a Municipal Comprehensive Review process which will allocate residential and employment numbers to 2051 as well as areas of concentration for both, within the greenfield development designated for the Town of Caledon - a process which has already been affected by the proposed highway;

And whereas, the current lack of opposition to the GTA West Highway by the Council of the Region of Peel has been cited as one of the provincial government's key assets in pushing the highway forward;

And whereas, the Region of Peel plays a significant political, financial and leadership role;

Therefore be it resolved, that the Council of the Region of Peel approve the following:

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Carried