

January 25th, 2022

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Public Works

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Re: ERO 019-4219 Moving to a project list approach under the Environmental Assessment Act

To whom it may concern:

Thank you for the opportunity to comment on ERO 019-4219 - Moving to a project list approach under the Environmental Assessment Act (EAA).

Subject to the comments provided below, Region of Peel staff are generally in agreement with the proposed changes to the listing of projects subject to comprehensive EA. The shift to a comprehensive Environmental Assessment (EA) project list is appreciated as it clarifies which larger scale projects would be subject to more comprehensive EA requirements.

The proposed amendments to the Class Environmental Assessments are expected to be beneficial by providing greater clarity, including updated terminology and thresholds. Further, it clarifies which proponents and projects are subject to a comprehensive EA or the specific class EA. It is expected that the accompanying transition regulations will make the shift to the comprehensive EA project list much easier.

Notwithstanding, Regional staff offer the following comments:

Highway Projects

- The proposed regulation would change the requirement for new highways or extensions of existing highways under 75km in length from requiring a comprehensive EA, formerly referred to as individual EA, to a streamlined EA process set out in the MTO Class EA. The regulation also seeks to amend the MTO Class EA. Regional staff seek clarity around the key differences between the current EA process and the new streamlined process as it relates to highway projects to ensure that both comprehensive and streamlined EA requirements for larger scale projects regardless of classification are subject to rigorous EA study requirements and consultation with municipalities, agencies and the public.
- Regional staff also seek further clarity on whether this regulation would impact new EAs only or whether it would also impact existing and ongoing individual EAs that no longer meet the requirements for as per this regulation. In particular, Regional staff request further clarity on whether this regulation would impact the Highway 413 EA and if so, Regional staff question how this regulation relates to the [“Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation’s Greater Toronto Area West Transportation Corridor project”](#)

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posted on the ERO in July 2020. Further, Regional staff would like to bring the following to the Province's attention:

- On March 11, 2021, Regional Council approved strong opposition to any and all advanced construction associated with preparations for a GTA West highway and Transmission Corridor.
- Lastly, should the EA requirements for new highways and highway extensions under 75km in length change to a streamlined EA process under the MTO Class EA, it should be ensured that impacts to environmental systems and health outcomes be thoroughly studied to identify opportunities to avoid, mitigate, or minimize the impacts. Further, thorough evaluation of alternatives as well as public and stakeholder consultation at key study milestones should continue to be engrained into the EA process.

Electricity Projects

- Regional staff comments regarding changes to the classification and related EA requirements for transmission line projects were previously provided to the Ministry in response to [ERO 019-3937](#) expressing similar comments.

If you have any questions, please contact Richa Dave, Principal Planner, Sustainable Transportation & Strategic Initiative, at richa.dave@peelregion.ca.

Sincerely,



Joe Avsec, Strategist
Transportation Division, Region of Peel