



REPORT

REPORT TO: Mayor Rick Bonnette & Members of Council

REPORT FROM: Chris G. Mills, P. Eng., Director of Infrastructure Services & Town Engineer
John Linhardt, MCIP, RPP, Director of Planning, Development & Sustainability

DATE: June 23, 2011

REPORT NO.: INF-2011-0035

RE: GTA West Corridor Environmental Assessment Transportation Development Strategy Report

RECOMMENDATION:

THAT Report No. INF-2011-0035, dated June 23, 2011, regarding the GTA West Corridor Environmental Assessment Transportation Development Strategy Report, be received;

AND FURTHER THAT the Town of Halton Hills requests that the Ministry of Transportation (MTO) amend the Draft GTA West Corridor Environmental Assessment Transportation Development Strategy Report prior to finalizing Stage 1 of the Environmental Assessment process to recommend only Alternative 4-2, which includes a new corridor from Highway 400 to the Highway 401/407 Interchange in Halton Hills and the required widening of Highway 401 from the Highway 401/407 Interchange to the Tremaine/Highway 401 Interchange in Milton using urban expressway criteria, to satisfy the transportation needs to 2031;

AND FURTHER THAT the MTO be advised that the Town of Halton Hills does not support the new east-west corridor through the agricultural and rural areas of Halton Hills from the north-south component to Tremaine Road (formerly Alternative 4-3) due to significant impacts on the Town's agriculture and rural fabric and inconsistency with the Province's, Region's and Council's vision of Halton Hills under the Growth Plan for the Greater Golden Horseshoe;

AND FURTHER THAT the Town of Halton Hills continues to support the transportation improvements outlined in the Halton-Peel Boundary Area Transportation Study

(HPBATS) (consistent with Alternative 4-2), as the strategy to accommodate the GTA West transportation demands to 2031 through Halton Hills;
AND FURTHER THAT a copy of this report be forwarded to The Honorable Kathleen Wynne, Minister of Transportation; Ted Arnott, MPP; Region of Halton; Town of Milton; City of Brampton; Town of Caledon; Region of Peel; MTO staff and consultants working on this project.

BACKGROUND:

Staff had previously reported to Council that the MTO was considering two options for the GTA West Corridor: Alternative 4-2 and Alternative 4-3.

Alternative 4-2 proposed a new Provincial transportation corridor, which would extend from Highway 400, across north Brampton/south Caledon, then generally follow the proposed North South Transportation Corridor (recommended in HPBATS), connect to Highway 401 and/or 407 between Eighth Line and Winston Churchill Boulevard in Halton Hills, and maximize the widening of the 401 Corridor to the Tremaine Road/Highway 401 Interchange in Milton.

Alternative 4-3 proposed a new Provincial transportation corridor from Highway 400, across north Brampton/south Caledon, then crossing into Halton Hills in the vicinity of the proposed North South Transportation Corridor and extending southwesterly through the agricultural and rural areas of Halton Hills between 5 Side Road and 10 Side Road, to Highway 401 in the vicinity of Tremaine Road in Milton.

Through Council Report No. INF-2010-0049, staff outlined a number of concerns related to Alternative 4-3, including the potential for this new Provincial transportation corridor to fragment the Town's agricultural area, undermine the rural character of the area, and potentially result in two new major transportation facilities in south Halton Hills (GTA West Corridor and North South Corridor recommended by HPBATS).

At Council meeting dated July 19, 2010; in response to Council Report No. INF-2010-0049, Council adopted the following recommendation:

THAT Report No. INF-2010-0049, dated July 7, 2010, regarding GTA West Corridor and Niagara to GTA Corridor, Planning and Environmental Assessment Studies Update, be received;

AND FURTHER THAT the MTO be requested to make a presentation to Council following the release of the Draft Transportation Strategy Report;

AND FURTHER THAT this report outlining the Town's serious concerns with the GTA West Corridor Alternative 4-3 be forwarded to the MTO for use in the development of the Transportation Strategy Report;

AND FURTHER THAT a copy of this report and the letter from the Mayor be circulated to Ted Arnott, MPP, Region of Halton, Town of Milton and MTO staff working on this project.

In March, 2011 the MTO released the Draft Transportation Development Strategy Report recommending one strategy, a combination of Alternatives 4-3 and 4-2 and indicated that it would be available for comment for a minimum of ninety (90) days. The complete report is available at <http://www.gta-west.com/reports.html#draftreports>.

COMMENTS:

With the release of the Draft Transportation Development Strategy, the Province moved away from their original intent of forwarding both Alternatives 4-2 and 4-3 to Phase 2 of the Environmental Assessment process. The recommended strategy is a single option to include elements of both Alternatives 4-2 and 4-3 consisting of a common corridor from Highway 400 to Halton Hills' eastern boundary, and then an east-west route south of 10 Side Road and a north-south connection to Highway 401/407 with the maximum widening of Highway 401 possible from the Highway 401/407 Interchange to the Tremaine/Highway 401 Interchange. A schematic of the recommended alternative is shown in Attachment 1.

MTO has also prepared a Preliminary Route Planning Study Area, Attachment 2, that illustrates the area in which new infrastructure may be located. As can be seen from the attachment, a significant amount of land in Halton Hills, south of 10 Side Road is included in the Study Area. At this time, it is unclear what actions MTO will take regarding development applications within the Study Area. Given the amount of time likely required to complete Phase 2 of the Environmental Assessment and define a precise corridor, it would not be unexpected for the Province to require some level of corridor protection within these lands.

Through approval of HPBATS, Council authorized staff to negotiate a Memorandum of Understanding with Halton, Peel, Brampton and Caledon to implement corridor protection for the recommended improvements arising out of that study. The corridor protection envisioned in the HPBATS exercise is scoped to only include the north-south corridor and east-west connection near Norval. Generally, the corridor protection would affect lands east of the Ninth Line to either the Tenth Line or Winston Churchill Boulevard, south of Georgetown.

A consulting team was engaged by the Town of Halton Hills to review the GTA West Corridor Environmental Assessment Transportation Development Strategy Report. The review focused on four main pillars:

- Planning Context & Consistency with Regional & Local Official Plans
- Environmental and Agricultural Impacts
- Environmental Assessment Process and Strategy Development
- Transportation Planning

The assessment from the respective consultants regarding these matters are included in Attachments 3 to 5. A brief summary is included in this report.

Planning Context & Consistency with Provincial, Regional & Local Official Plans

The Region of Halton and the Town of Halton Hills recently completed Official Plan updates in 2009 and 2010, respectively. At the forefront was Sustainable Halton, which was a Regionally led initiative in keeping with the Provincial Growth Plan under the Places to Grow Act and the Provincial Policy Statement. The process, which was primarily a review of the Region's Urban and Rural Structure, was a complex undertaking involving matters such as Provincial and Regional policy, urban land supply, intensification, servicing, transportation, natural heritage, agriculture, mineral aggregate resources, municipal finance, local aspirations and public, agency and landowner input.

Subsequent to Town Council's adoption of the new Official Plan in 2006, the Town commenced several strategic and land use planning initiatives that were related to, and were intended to respond to the Growth Plan from a local perspective and provide input to the Sustainable Halton Plan process. These initiatives included:

- A new Community Strategic Plan to the 2031 planning horizon setting out a broad vision for the community contained in eight strategic directions.
- A number of Discussion Papers and staff reports related to Sustainable Halton setting out a preferred scale of urban growth in Halton Hills to the 2031 planning horizon and protecting and preserving the remaining agricultural and rural lands in Halton Hills.
- Examination of the Town's capacity to accommodate intensification within the context provided by the Provincial Growth Plan through the Intensification Opportunities Study (OPA No. 9) and the Georgetown GO Station Mill Street Corridor Secondary Plan (OPA No. 7).

The Town's preference was to accommodate a moderate amount of urban growth (Sustainable Halton - Concept 2) through intensification and new greenfield residential/mixed-use opportunities, while providing for new employment opportunities in the context of an expanded 401-407 Employment Corridor to the 2031 planning horizon. The Town also stressed to the Region the importance of minimizing impacts on our prime agricultural area and the development of an Agricultural Strategy. Concept 2, which was recommended by the Region and formed the basis for ROPA No. 38 and OPA No. 10, maintains and strengthens the Town's Community Vision and structure of three urban areas separated by agricultural and environmental lands, the essence of which is captured in the following excerpt from the Official Plan:

The Town of Halton Hills is comprised of several settlement areas of varying size and a substantial rural area with a distinctive and enviable identity that comes from the beauty and tranquility of its rural setting. It is a place where residents enjoy safe family living, scenic beauty and active community life. The community recognizes the unique attributes that set it apart from other places and is passionate about preserving the small town character and rural feeling while accommodating a moderate scale of growth to 2031 that is in keeping with the Town's urban and rural character, as articulated in the Town Strategic Plan (2007). The preservation and enhancement of these features while keeping pace with the diverse needs of the community is at the forefront of the Town's Vision for its future.

The importance of agriculture as a land use and economic activity in the Town is also recognized in the Community Vision:

The agricultural areas of the Town are considered to be an important component of what makes up the character of the community. These areas must be protected for future agricultural use so that they can continue to serve an important role in the local economy. The fragmentation of agricultural areas and the introduction of incompatible uses in these areas is strongly discouraged by the Official Plan.

It is important to note that the ramifications of the Halton Peel Boundary Area Transportation Study (HPBATS), specifically the potential for a north-south freeway (similar to Alternative 4-2) located in the southeast portion of the Town connecting to Highways 401 and 407, was considered as part of the Sustainable Halton process. Indeed, the possibility of such a facility provided the basis for the identification of Future Strategic Employment Areas (FSEA) in ROPA No. 38 for lands generally between Georgetown and the 401-407 Employment Corridor to the east of the Tenth Line.

Conversely, Alternative 4-3 to 2031 was not considered through the Sustainable Halton process. The impacts on the Town's prime agricultural lands are set out in a memorandum from Stovel and Associates Inc., which is attached to this report as Attachment 3. These impacts have the potential to undermine the Region Official Plan and the Halton Hills' Official Plan (Sections A1, A2.5, E1 and E2) policy framework pertaining to the protection of agricultural lands from incompatible land uses and prohibiting the further fragmentation of the land base. Alternative 4-3 to 2031 does not appear to be in keeping with the Province's own Growth Plan under the Places to Grow Act, which calls for the protection and preservation of agricultural land as a Provincial resource not just a Regional or Local resource.

Given the linkages between urban development and transportation corridors, which are magnified in high growth areas, Alternative 4-3 also has the potential to put further pressures on the new urban boundaries as determined through the Sustainable Halton process, particularly on lands immediately south of Georgetown.

Environmental and Agricultural Impacts

A review of the environmental and agriculture impacts within Halton Hills associated with the strategy has been completed by Stovel and Associates Inc., and is included as Attachment 3 of this report.

The review advises that the potential for impact on the Natural Environment is greater with Alternative 4-3 than Alternative 4-2. In this regard, it is noted that the western section of Alternative 4-3 represents the main area for significant natural heritage features and natural resource features, and includes:

- Provincially significant Wetland
- Escarpment Natural Area
- Escarpment Protection Area
- Habitat for Rare, Threatened and Endangered Species
- ESA
- Life Science Area of Natural and Scientific Interest

The consultant concluded that Alternative 4-3 could result in the partial consumption or additional removal of woodlands and natural wildlife habitat.

With respect to agriculture, Stovel and Associates Inc. advise that “a major highway right-of-way associated with Corridor 4-3 will result in the consumption of prime agricultural lands and the potential fragmentation of a prime agricultural area. Indirect and direct impacts on the agricultural community will be difficult to mitigate. The extent of these potential impacts will be more significant than Corridor 4-2, because the proposed east-west orientation of Corridor 4-3 consumes substantially more of the prime agricultural area than Corridor 4-2. Also, Corridor 4-2 is located in the south-east portion of the Town of Halton Hills and this area represents the peripheral region of the prime agricultural area.”

Stovel and Associates Inc. further advises that the combination of Alternatives 4-2 and 4-3, in the southern portion of Halton Hills will result in the most significant impact on prime agriculture lands.

Environmental Assessment Process and Strategy Development

Comments on the Environmental Assessment process and Strategy Development have been prepared by R.J. Burnside & Associates Limited and are included as Attachment 4 to this report.

A concern was flagged by the consultant regarding the application of the “building block approach” in particular with the coupling of alternatives at the end of the study process. It is acknowledged that utilizing the building block approach is appropriate for this study, but the concern is that the application did not sufficiently address the Group 3 components in concert with the 4-2 alternative. Group 3 alternatives primarily focused on expansion of existing infrastructure. This resulted in the study concluding the need for a new corridor to satisfy traffic demand.

There was also concern with how the alternatives were compared relative to environmental impacts. The defined impacts of Alternative 4-3 appeared to be substantially greater, but then Alternative 4-2 was then rationalized as “slightly fewer potential natural environment effects”. A second look at the environmental screening of these two corridors is warranted.

The consultant disagrees that the new corridor “provides for the protection, conservation, and wise management of Ontario’s environment”, as mandated by the Ontario Environmental Assessment Act.

The final point to highlight is the need for the integration of the study with the Niagara to GTA (NGTA) Environmental Assessment Study. With the NGTA not being finalized until the western study area is re-examined and concluded, it would be prudent to include the western terminus of GTA West as part of the same review process.

Transportation Planning

Matters pertaining to transportation planning have been examined by Hatch Mott MacDonald and are attached to this report as Attachment 5.

The review of the transportation planning focused on the discount of the effect of road pricing on transportation demand, even after it was requested by one of the neighbouring municipalities. It is felt that this could result in a significant shift in demand to the 2031 horizon.

An area to investigate further is the expanded use of rail and inter-regional transit as promoted by Metrolinx to influence travel demand.

The specific issue of widening Highway 401 was examined to determine if there is an opportunity to expand beyond the proposed ten (10) lanes currently being reviewed through a separate environmental assessment. The consultant suggested that there may be alternatives to consider by moving away from a wide rural standard to a more compact sub-collector system that could still provide the required capacity and some

redundancy. Insufficient evidence was presented in the strategy to discount Alternative 4-2 with a widened Highway 401 Corridor. This is a critical component as the environmental and agriculture impacts would be significantly less with a widening of Highway 401 than a new east-west corridor.

Summary

In summary, there are a number of issues related to the need and appropriateness of proceeding with the Alternative 4-3 component of the draft strategy, which essentially provides for a twinning of Highway 401 between Winston Churchill Boulevard and Tremaine Road routed southwesterly across the agricultural and rural area of Halton Hills. The following items need to be considered and compared against a strategy consisting of only Alternative 4-2, including a compact widened Highway 401 through Milton and Halton Hills, as the “final” output of Stage 1:

NEED - The GTA West Corridor Study establishes a hierarchy based on the principle of first optimizing the existing transportation network, and then, if necessary, incorporating non-roadway infrastructure improvements and expansion before considering the provision of new roads and/or highways. However, the study did not conclusively eliminate the possibility of widening Highway 401, west of James Snow Parkway coupled with the widening of other facilities such as Highway 7 and Highway 24 before recommending the new corridor defined in Alternative 4-3.

IMPACT – During the last update of the Regional and Halton Hills Official Plans, and in response to agency and public comment, the vast majority of prime agricultural areas within the Town were protected. New urban land identified through Sustainable Halton is compact and immediately adjacent to the existing urban boundary. However, MTO recommended a strategy consisting of two major freeways in Halton Hills that will bisect an important agricultural area leaving the area fragmented into three small sections.

RATIONALE – Given that there is a study area required in the north section of the NGTA Corridor, it would be prudent to defer the Alternative 4-3 component until this study is complete. Further, the study of the NGTA extension should consider improvements north of Highway 401, which could connect to the GTA West Corridor or upgrade of existing east-west transportation routes such as Highway 7 and Highway 24 to facilitate the northern traffic movements, as originally anticipated in the Places to Grow Act.

Conclusion

Through analysis of the Draft Transportation Development Strategy, the following conclusions have been reached:

1. That the Town of Halton Hills not support the recommendation to proceed with Alternatives 4-2 and 4-3 as one consolidated strategy.
2. That the Town of Halton Hills support the construction of Alternative 4-2 and improvements to Highway 401 to meet the transportation needs to 2031 and further, that the Ministry continue to pursue the future widening of Highway 401 to twelve (12) lanes west of James Snow Parkway using a compact urban expressway rather than a “rural” standard.
3. That the Town of Halton Hills request that the study area related to the interchange connection at Highway 401/407 be reduced to an area east of Ninth Line to Tenth Line, reducing the impact on the Town’s employment lands, consistent with the recommendations of HPBATS and supported by various functional engineering designs.
4. That the Town of Halton Hills request that the Minister defer any consideration of Alternative 4-3 component to after 2031 to allow for the following matters to be properly addressed:
 - a) Numerous members of the public living in the Halton Hills area of the proposed 4-3 corridor have indicated they were not aware of the study and potential impacts to their properties.
 - b) The GTA West Corridor Environmental Assessment considered a number of alternatives, but recommended a combination of Alternatives 4-2 and 4-3. Their collective impact on the environment, agriculture, the rural area and social factors were not assessed. In addition, there does not appear to be sufficient analysis conducted on the impacts of Group 3 alternatives in concert with the Alternative 4-2 solution. For example, the widening of Highway 7 and Highway 24 should be considered in the strategy along with Alternative 4-2.
 - c) The GTA West Study does not appear to be properly linked to the Niagara to GTA study (NGTA). While the NGTA study could route traffic toward potential corridors in Halton Hills, the implications of various routes have not been considered holistically. Therefore, it is reasonable to create a western study area similar and adjacent to the NGTA Corridor Study area to allow for further study, as to the possibility of either creating a new route as shown in Places to Grow or upgrade existing transportation routes with appropriate

alternate routes around communities to achieve a broader Provincial network.

d) Allow for further design, economic, and environmental work to be completed on the widening of Highway 401 to determine whether a twinning of Highway 401 between Winston Churchill Boulevard and Tremaine Road in a new corridor is justified and necessary given the potential cost implications, the Ministry's stated desire to prioritize improvements to existing infrastructure over the creation of new road corridors, and the importance of this area as a prime agricultural area identified in the Province's Growth Plan and the Region's and Town's Official Plans.

RELATIONSHIP TO STRATEGIC PLAN:

The east-west freeway component identified in the Draft GTA West Environmental Assessment Transportation Development Strategy Report is not consistent with the Community Vision to 2031 or Corporate Mission to 2031.

FINANCIAL IMPACT:

There could be a future financial impact related to the Town's 401-407 Employment Corridor associated with uncertainty created with the broad MTO Study Area for Stage 2. At this time, it is difficult to assess the impacts with any level of certainty.

COMMUNICATIONS IMPACT:

The MTO staff will be advised of the recommendations and provided a copy of this report for inclusion in the Environmental Assessment Report.

ENVIRONMENTAL IMPACT:

The environmental impacts are evaluated in the Draft GTA West Environmental Assessment Transportation Development Strategy Report. Consultants working for the Town have also identified a number of environmental impacts and constraints as presented in the attachments to this report. Stage 2 of the Environmental Assessment process will focus on mitigation of the identified impacts.

CONSULTATION:

Consultation with the Senior Management Team was undertaken as part of the development of this report.

CONCLUSION:

The MTO Draft GTA West Environmental Assessment Transportation Development Strategy Report is nearing the completion of Stage 1 of the Individual Environmental Assessment process. Comments have been requested by MTO on the Transportation Development Strategy Report. It is important for the Town to clearly outline and articulate the concerns associated with the report and request the Minister to amend the recommendation to be consistent with our community vision, as set out in the Strategic Plan and the Official Plan, while still satisfying the transportation demands to 2031.

Respectfully submitted,

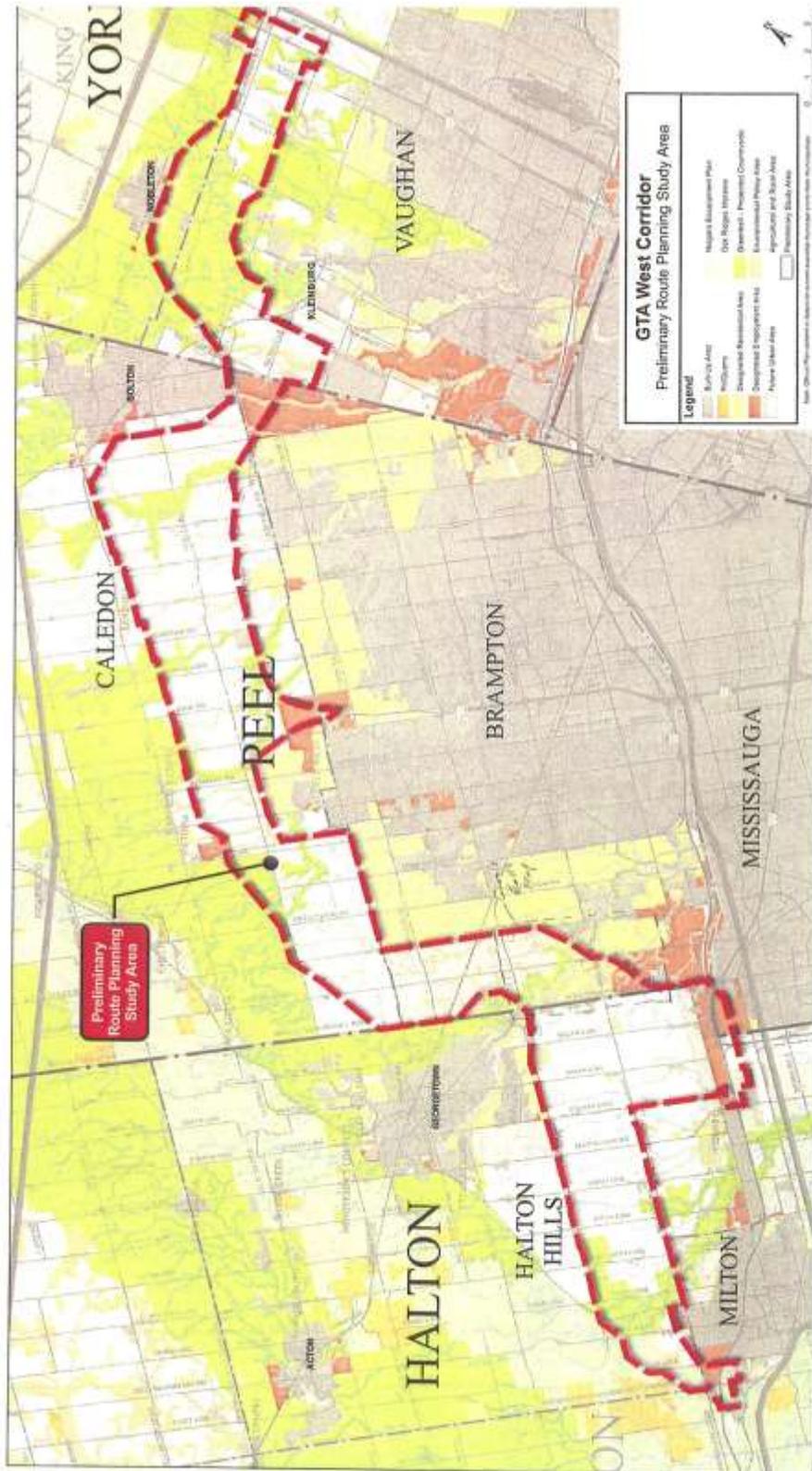
Chris G. Mills, P. Eng.
Director of Infrastructure Services &
Town Engineer

John Linhardt, MCIP, RPP
Director of Planning, Development &
Sustainability

Dennis Y. Perlin
Chief Administrative Officer

Exhibit 1-15: Draft Transportation Development Strategy





Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

June 21, 2011

Town of Halton Hills
1 Halton Hills Drive
Halton Hills, ON
L7G 5G2

Attention: Mr. Chris Mills, Director of Infrastructure Services

SUBJECT: GTA West – Environmental and Agricultural Review – Corridors 4-2 and 4-3 (Town of Halton Hills)

Stovel and Associates Inc. is pleased to submit this summary report for the environmental and agricultural components of the GTA West project – Corridors 4-2 and 4-3, as it pertains to the Town of Halton Hills.

Study Approach

The following summary report was completed using published secondary data sources, supplemented by a reconnaissance level survey of the two study corridors, in the Town of Halton Hills.

Secondary data sources were reviewed:

- Review of Aerial Photography,
- Review of Official Plan schedules and background environmental mapping,
- Review of mapping related to the following: significant wetlands, significant woodlands, fisheries resources,
- Review of NEP designations,
- Review of Soil Survey information for this portion of Halton Region,
- Review of Phase 3 – Sustainable Halton Report 3.04 – Agricultural Countryside Strategy and Report 3.03 – An Agricultural Evaluation,
- Conservation Halton – GTA West Corridor Environmental Assessment (May 11, 2011): Letter to Neil Ahmed, McCormick Rankin Corporation.

As part of this analysis, environmental mapping prepared by R.J. Burnside and Associates Limited (“Burnside”) were also considered. This mapping provided current environmental planning designations on an aerial photomosaic for each study corridor.

General Description of the Study Corridors in the Town of Halton Hills

A key physiographic feature in the Town of Halton Hills is the Niagara Escarpment. The Niagara Escarpment cuts diagonally across the Town of Halton Hills and provides an abrupt and major change in the landscape. Much of the area above the Niagara Escarpment consists of a stony,

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hilly landscape with numerous un-drained swamps. This area is generally comprised of poorer quality agricultural soils, due in large part to the lack of soil cover over bedrock, poor internal drainage and steep slopes.

The converse is generally true for lands below the Escarpment. The quality of agricultural soils on lands below the Escarpment is generally considered to be prime agricultural soils, mainly consisting of extensive tracts of Canada Land Inventory (CLI) – Soil Capability for Agriculture Classes 1-3 soils.

Corridors 4-2 and 4-3 are both located in the southern portion of the Town of Halton Hills, below the brow of the Niagara Escarpment. Only a small portion of the westerly limits of Corridor 4-3 is set in proximity to the Niagara Escarpment.

Corridor 4-2 has a north-south orientation in the Town of Halton Hills. Corridor 4-2 is located along the eastern portion of the Town and extends from lands just above Georgetown to the existing Provincial Highway 401 corridor.

Corridor 4-3 takes an east-west orientation in the Town of Halton Hills. Corridor 4-3 extends from the Niagara Escarpment to the eastern boundary of the Town of Halton Hills.

Discussion of Corridor 4-2

Agriculture

For the most part, Corridor 4-2 is set on an extensive tract of Prime Agricultural Soils, i.e. CLI Classes 1-3 – Soil Capability for Agriculture. Agricultural soils in this area of the Town of Halton Hills mainly consist of soils from the Oneida catena (i.e. Oneida clay loam is the well-drained member and Chinguacousy clay loams are the imperfectly drained member of this catena). These soils are developed on calcareous clay loam and silty clay loam parent material. These lands have been used over the past century for the production of common field crops, and in localized areas, specialty crop production. These soils represent some of the best agricultural soils in the Regional Municipality of Halton.

Background planning reports, prepared by the Region of Halton, provide a reasonable description of the quality of agricultural land and related agricultural resources (i.e. Phase 3 – Sustainable Halton Report 3.04 – Agricultural Countryside Strategy and Report 3.03 – An Agricultural Evaluation). Key findings of the Sustainable Halton reporting (that apply to the agricultural resources associated with Corridor 4-2) are as follows:

- Approximately 14 Specialty Crop Areas are mapped in proximity to Corridor 4-2. These operations consist mainly of cash crop (vegetables) and nurseries;
- Most of the Corridor 4-2 area is comprised of CLI Classes 1-3 soils;
- Most of the land associated with Corridor 4-2 consistently scores the highest in the Halton Land Evaluation / Area Review (LEAR). As a result, the LEAR confirmed that a good portion of Corridor 4-2 is considered to be a Prime Agricultural Area as defined in the Provincial Policy Statement.

With the recent approval of Regional Official Plan Amendment No. 38, the urban boundary for Georgetown was extended to Sideroad 10 and the 401/407 Employment Corridor was expanded. In this part of the Town of Halton Hills, the Prime Agricultural Area is at its narrowest, extending approximately 5 km from just north of Provincial Highway 401 to Sideroad 10. In order to minimize the potential for impacts on the agricultural community, it would be beneficial to keep the highway corridor more to the periphery of the Prime Agricultural Area in the southeastern portion of the Town of Halton Hills. This objective could be achieved with Corridor 4-2.

Natural Environment:

The main watercourses that are found in Corridor 4-2 include the following:

- East Sixteen Mile Creek – located in the western portion of the corridor, between Eighth Line and Ninth Line, to just east of Hornby,
- Levi's Creek – located in the eastern extreme portion of the study corridor, this stream flows in a southerly direction,
- Silver Creek – located in the eastern extreme portion of the study corridor, this stream flows in a southerly direction, and
- Credit River – located near the eastern boundary of the study corridor, this stream flows in a southerly direction.

In terms of fish habitat, both Silver Creek and the Credit River are well-known, and highly regarded cold water fisheries. Levi's Creek, Silver Creek and the Credit River are located in close or immediate proximity to Georgetown.

In the Georgetown area, Greenland features (significant wetland, woodland, ESA) are associated with the forested river valleys in proximity to Silver Creek and the Credit River.

The remaining natural heritage features in Corridor 4-2 are mainly smaller, isolated woodlands and locally significant wetland pockets.

Discussion of Corridor 4-3

Agriculture

Similar to Corridor 4-2, Corridor 4-3 is set on an extensive tract of Prime Agricultural Soils, i.e. CLI Classes 1-3 – Soil Capability for Agriculture.

Key findings of the Sustainable Halton reporting (that apply to related to agricultural resources associated with Corridor 4-3) are as follows:

- Approximately 15 Specialty Crop Areas are mapped within Corridor 4-3. These operations consist mainly of cash crop (vegetables), orchards, greenhouses and nurseries;
- Most of Corridor 4-3 is comprised of CLI Classes 1-3 soils;
- Most of the land associated with Corridor 4-3 consistently scores the highest in the Halton Land Evaluation / Area Review (LEAR). As a result, the LEAR confirmed that a

good portion of Corridor 4-3 is considered to be a Prime Agricultural Area as defined in the Provincial Policy Statement.

It is reasonable to conclude that, if a highway is constructed in Corridor 4-3, it will result in the immediate consumption of prime agricultural land. This impact can be easily calculated based on the length of the corridor multiplied by the width of the highway right-of-way. As most of the land in Corridor 4-3 is considered prime agricultural land, this represents a direct impact on the agricultural resource base. Corridor 4-3 is substantially longer than Corridor 4-2, and therefore the consumption of prime agricultural land will be greater with Corridor 4-3.

However, it is important to recognize that the impact of the highway will be amplified beyond this immediate loss of farmland. As there appears to be no viable method to avoid the fragmentation of the Prime Agricultural Area, it is improbable that the actual reduction in the size of the Prime Agricultural Area will be contained to just the width of the highway corridor, given the 250 ha guideline that is used to determine sufficiently large tracts of prime agricultural area (Region of Halton, 2009. An Agricultural Evaluation. Phase 3 – Sustainable Halton Report 3.03). Depending on the location of the highway, remnant portions of prime agricultural land could be separated from the main body of the Prime Agricultural Area, thus magnifying the potential for agricultural impacts from the selection of Corridor 4-3.

Additional impacts on the agricultural resource base will result from the development of a highway through this Prime Agricultural Area. These impacts could include the following:

- Lack of accessibility to remaining agricultural parcels,
- Potential loss of special crop operations and/or the potential marginalization of these operations due to lack of immediate and easy access to these agricultural businesses,
- Potential for conflicts related to: a) movement of farm machinery, b) vandalism, trespassing and other nuisances, c) impacts related to salt spray on orchards, nurseries and vegetable crops, d) increased litter and rodent problems,
- Potential for increased speculation on remaining agricultural lands,
- Reduced productivity and/or increased inefficiency associated with fragmented, smaller and/or irregular-shaped farm parcels.

Natural Environment:

The main watercourses that are found in the 4-3 Corridor include the following:

- Middle Sixteen Mile Creek – located in the southwestern extreme portion of the corridor (near the Dufferin Aggregate Milton Quarry), this creek flows in a southerly direction,
- East Sixteen Mile Creek – located in the eastern portion of the corridor, this creek flows in a southerly direction and extends from just south of Stewarttown to just east of Hornby,
- Levi's Creek – located in the eastern extreme portion of the study corridor, this stream flows in a southerly direction,
- Silver Creek – located in the eastern extreme portion of the study corridor, this stream flows in a southerly direction, and
- Credit River – located near the eastern boundary of the study corridor, this stream flows

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in a southerly direction.

In terms of fish habitat, both Silver Creek and the Credit River are well-known, and highly regarded cold water fisheries. Levi's Creek, Silver Creek and the Credit River are located in close or immediate proximity to Georgetown.

The western extreme portion of the 4-3 Corridor represents the main area of significant natural heritage features and natural resource features. The area from approximately Lot 8, Concession 1 and 2 to Lot 11, Concessions 1 and 2 include the following features:

- Provincially significant wetland,
- Escarpment Natural Area,
- Escarpment Protection Area,
- Habitat for Rare, Threatened and Endangered Species,
- ESA,
- Life Science Area of Natural and Scientific Interest.

The remaining natural heritage features in Corridor 4-3 are mainly smaller, isolated woodlands and locally significant wetland pockets. In the northeastern portion of the Corridor, in the Georgetown area, Greenland features (significant wetland, woodland, ESA) are associated with the forested river valleys in proximity to Silver Creek and the Credit River.

Conclusions

The potential for impact on the Natural Environment is greater with the Corridor 4-3 than Corridor 4-2. In reviewing the potential for Natural Environment impacts, Corridor 4-3 could impact more watercourses than Corridor 4-2. Likewise, Corridor 4-3 could result in the partial consumption or removal an additional three kilometers of woodlot, potentially impacting habitat for rare species.

The impact of Corridor 4-3 on the agricultural resource base could be significant. A major highway right-of-way associated with Corridor 4-3 will result in the consumption of prime agricultural lands and the potential fragmentation of a Prime Agricultural Area and the consumption of Prime Agricultural Lands. Indirect and direct impacts on the agricultural community will be difficult to mitigate. The extent of these potential impacts will be more significant than Corridor 4-2 because the proposed east-west orientation of Corridor 4-3 consumes substantially more of the Prime Agricultural Area than Corridor 4-2. Also, Corridor 4-2 is located in the southeast portion of the Town of Halton Hills, and this area represents the peripheral region of the Prime Agricultural Area.

An examination of the potential routing alternatives within the Corridor 4-2 alignment is worthy of consideration. In the area immediately south of Georgetown, the Prime Agricultural Area is at its narrowest. Therefore, a highway corridor that is routed through this area will result in the lowest relative impact on the Prime Agricultural Area.

The combination of Corridors 4-2 and 4-3, in the southern portion of the Town of Halton Hills,

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will result in the most significant impact on the Prime Agricultural Area. The direct impact of Corridor 4-2 in addition to Corridor 4-3 will be the consumption of prime agricultural land and the further fragmentation of the Prime Agricultural Area. Indirect impacts on the Prime Agricultural Area, such as land speculation, could also be amplified as a result of a combined 4-2/4-3 Corridor.

I trust that you will find this summary report to be of sufficient detail. Should you have any concerns or questions, please do not hesitate to contact me.

Yours truly,

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P.Ag

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Memorandum

Date: June 20, 2011 **File No.:** MTO 019773
Project: GTA West Corridor Environmental Assessment
To: Chris Mills, Director of Infrastructure Services, Town of Halton Hills
From: Gord Feniak, P.Eng.
Via: Email

Comments

Environmental Assessment Process

Overview – The mandate of the Environmental Assessment Act is to "provide for the protection, conservation, and wise management of Ontario's environment". In our opinion the GTA West Corridor Environmental Assessment has failed to meet that mandate.

Upon reviewing the material presented, a logical conclusion would be to widen existing highways where possible (Highway 401 through Milton) and to only construct new highway corridors as a last resort (north-south corridor along alignment described as 4-2). However, the GTA West recommendation is for an entire new corridor (described as 4-3), without adequate justification.

Building Block Approach Not Properly Implemented

"the Ontario government's first priority will be optimization of existing infrastructure" (Page 29)

The Study establishes a hierarchy of Alternatives, which we agree with, but we are concerned with the apparent failure to apply the hierarchy consistently.

The hierarchy is described in Section 3.1 (Page 48). "A "building-block" approach was used to assemble the group alternatives, based on the principal of first optimizing the existing transportation network, and then, if necessary, incorporating non-roadway infrastructure improvements and expansion before considering the provision of new roads and / or highways. This approach was developed to align with the underlying principles of the Growth Plan and Greenbelt Plan. This approach is consistent with current government policy, which talks to optimizing existing infrastructure before new infrastructure is built, and promotes transit initiatives as a priority....."

The "building blocks" are as follows:

- Group 1 – Optimize Existing Networks
- Group 2 – New/Expanded Non-Road Infrastructure
- Group 3 – Widen/Improve Roads
- Group 4 – New Transportation Corridors.

Conceptually we are in full agreement with this approach. Setting aside Groups 1 and 2, the hierarchy would suggest that Highway 401 should be widened to the extent possible before consideration is given to new transportation corridors. This consideration applies to the comparison of Alternatives 4-2 and 4-3 whose general difference is that Alternative 4-2 requires additional widening of Highway 401 while Alternative 4-3 establishes a new east-west corridor instead. The Study did not provide evidence that explains why the Group 3 component of Alternative 4-2 was unachievable. Furthermore, the Town has engaged the services of Hatch Mott MacDonald who are of the opinion on the review of the available materials that additional widenings of Highway 401 are in fact viable.

In conclusion, it appears that the Building Block approach was applied incorrectly. The proponents used the building blocks as thresholds, such that once a set of alternatives passed the Group 4 threshold, they were no longer compared with rigor and the concept of minimizing impact on the environment was lost.

Alternatives Not Compared Objectively

Notwithstanding a stated desire to optimize existing infrastructure before initiating new corridors, there appear to be several judgments in the report that do the opposite. This is particularly obvious in Chapter 7 which provides a detailed comparison of alternatives 4-2 and 4-3. For example:

- In reviewing Natural Environment impacts, starting on Page 221 the Study finds that Alternative 4-3:
 - requires over three times as many watercourse impacts than 4-2,
 - affects 50 percent more watercourses with aquatic species at risk,
 - removes an additional three kilometers of woodlot,
 - potentially impacts Milton Heights marsh,
 - potentially impacts two additional Species at Risk,
 - is 8 kilometers longer than 4-2, and
 - consumes an additional 119 hectares of land.

However this is summarized by saying that Alternative 4-2 has "*slightly fewer potential natural environment effects*". In our opinion, the hierarchy favours widening of existing roads over new corridors precisely for the purpose of avoiding this type of impact.

- Page 237 contains the following statement: "*The capacity assessment of Highway 401 suggests that Alternative 4-3 is preferred to Alternative 4-2 since it provides an alternative of Highway 401 through Milton*". How does that meet the mandate of the Environmental Assessment Act to "provide for the protection, conservation, and wise management of Ontario's environment"? The building block hierarchy prefers the

lessened impacts of a road widening to the "alternative" of a new corridor, yet the report appears to have done the opposite.

- Page 240 describes a benefit of Alternative 4-3 as "*it serves as an alternative route to the Highway 401/Alternative 3 route, thus providing system redundancy in the case of incidents and peak period congestion*". Again, this undermines the building block concept and is an extremely weak justification for the additional environmental impacts associated with a new highway corridor. It is also noted that should the 401 be widened into a collector/core system (consistent with Group 3) that this provides system redundancy as well.

In conclusion, the detailed comparison of alternatives was inconsistent with the stated objective of prioritizing existing infrastructure over new corridors.

"Alternative" Means Alternative

The word "alternative" is defined by the Merriam-Webster dictionary as follows:

- 1 *a: a proposition or situation offering a choice between two or more things only one of which may be chosen; b: an opportunity for deciding between two or more courses or propositions*
- 2 *a: one of two or more things, courses, or propositions to be chosen; b: something which can be chosen instead <the only alternative to intervention>*

By this definition, alternatives are mutually exclusive and cannot each be chosen, as the proponent has done with Alternatives 4-2 and 4-3. Specifically, the difference is more important than just the definition of words. The EA process has involved a comparison of the impact of each alternative on the natural, social, and economic environments. It did not look at the collective impact of 4-2 and 4-3 and accordingly, was unable to compare this collective impact with other alternatives. Clearly the fact that each alternative has minor impacts in its own right does not lead to a conclusion that the collective impact is also minor. Therefore the Study has arrived at a conclusion that has not been properly compared with other alternatives.

Lack of Attention to Niagara Escarpment

Observation of the report mapping shows a study area that generally runs in an east-west direction, which appropriately addresses traffic flow also in an east-west direction. The study area is bisected near its middle by the Niagara Escarpment which runs north-south. The intersection of the study area and the Niagara Escarpment is best described as a cross, such that the object of the study is to consider traffic crossing the Niagara Escarpment in perpendicular direction.

The environmental significance of the Niagara Escarpment is well described by its United Nations biosphere reserve designation, taken from the NEC website:

The biosphere is all of the land, water and atmosphere that support life.

A biosphere reserve is an international designation of recognition from UNESCO (the United Nations Educational, Scientific, and Cultural Organization) for an area in the world which is deemed to demonstrate a "balanced relationship between humans and the biosphere." By this is meant that collaborative efforts among people in the designated area serve to promote the sustainability of local economies and communities, as well as the conservation of the terrestrial/or coastal ecosystems they are in.

A biosphere reserve designation gives an area international recognition for the important ecological and cultural values in an area. It also provides a mechanism, based on local commitment and local ability, to apply sound stewardship (and protection, where necessary) to the use of resources in an area to support present and future generations.

The Niagara Escarpment Biosphere Reserve conserves the Province of Ontario's natural and social capital by protecting prime agricultural lands, forests, water, wetlands, heritage properties and recreational spaces.

This description of the Niagara Escarpment is similar to the exact mandate of the Environmental Assessment Act, which is to "provide for the protection, conservation, and wise management of Ontario's environment." Yet the GTA West Corridor Environmental Assessment only gives cursory consideration to the escarpment. It is our opinion that the Niagara Escarpment is deserving of a broader view.

The Study does not consider impacts beyond the year 2031. Yet it suggests a road network that will reach its capacity by that time and thereby eliminates alternatives for optimal locations to cross the escarpment. In our view, the Niagara Escarpment should predominate over the traffic routes that attempt to cross it. The Environmental Assessment should consider the best places for traffic to cross the escarpment, and presumably there should be a minimal number of crossings consistent with the direction in the hierarchy. Those considerations should be based on a horizon year well beyond 2031.

Cannot Finalize Prior to Niagara to GTA Corridor Planning

The Niagara to GTA Planning and Environmental Assessment Study has not been finalized. Eventually it will select a corridor location that enters the GTA West study area somewhere. Until the location of that corridor is known, it is premature to finalize corridors in the GTA West area.

This is particularly important when considered in light of the Niagara Escarpment. The Niagara and GTA West traffic has to cross the Niagara Escarpment at some point. That point should be selected on the basis of minimizing the impact to the environment.

The solutions to the GTA West and the Niagara to GTA studies must be found comprehensively. One cannot be permitted to dictate to the other.

Conclusion

In our opinion, the GTA West Corridor Environmental Assessment Draft Study Report has failed to meet the mandate of the Environmental Assessment Act as it does not adequately "provide for the protection, conservation, and wise management of Ontario's environment".

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**Hatch Mott
MacDonald**

MEMO

To Chris Mills, Town of Halton Hills
From John McGill and John Hemingway
Date June 22, 2011
Project # 279187-03
Page 1 of 3
Subject Town of Halton Hills Re: West GTA File #050974

The following are our comments concerning the GTA West TDS report for your consideration:

1. Report Review: Our review of the report has included the following documents:
 - a) URS, AECOM, Ecoplans Ltd., "GTA West Corridor Environmental Assessment: Area Transportation Alternatives Report", Ministry of Transportation, Ontario, January, 2011
 - b) URS, AECOM, Ecoplans Ltd., "GTA West Corridor Environmental Assessment: Transportation Development Strategy Report", Ministry of Transportation, Ontario, February, 2011
 - c) Ministry of Transportation, Ontario, "W.O. 07-20021: Highway 401 Improvements, Credit River to Trafalgar Road Class Environmental Assessment (Group B): Municipal Meeting Presentation to Halton Region, Peel Region, Town of Halton Hills, Town of Milton, City of Mississauga", February 23, 2011
 - d) Ministry of Transportation, Ontario, "W.O. 07-20024: Highway 401 Improvements, Trafalgar Road to Regional Road 25 Class Environmental Assessment (Group B): Municipal Liaison Meeting #2", February 23, 2011
 - e) Ministry of Transportation, Ontario, "GTA West Corridor Planning and EA Study – Stage 1: Draft Transportation Development Strategy", Presentation to Halton Region, April 14, 2011

2. Methodology: Overall, we have found the GTA West TDS report methodology, analysis and evaluation does not consider a full range of planning solutions. Specifically, the report does not give consideration to the effect that road pricing would have on auto and transit trips over the 20-year planning horizon. In fact, one could argue that the planning horizon itself is too short for this type of study. We respectfully disagree with the Study Team response made in Appendix C: Summary of Comments and Responses (January, 2011), in responding to a comment made by the Region of Waterloo regarding road tolling. The response indicates firstly that a full analysis of road tolling would need to be studied separately and that tolling analysis is generally undertaken during later stages of the EA process once alternative alignments have been developed. The rationale given in Table B-2, Appendix B, Assessment of Multi-modal Alternatives indicates that tolling is an implementation issue (see rationale for Points 163, 171, 179). Under Point 194 of Table B-2, it is indicated that tolling existing facilities is beyond the Terms of Reference for this study.

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To Chris Mills, Town of Halton Hills
Date June 22, 2011
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The Region raised the issue of tolling in at least two contexts: tolling the new freeway specifically and tolling all other 400-series highways as part of an overall traffic management strategy. In the former case, one might consider the tolling to be somewhat of an implementation issue; in the latter, tolling can be considered a transportation demand management practice similar to charging for parking as an incentive to leave the car at home and to take transit. It has been referred to in Appendix A, Individual Transportation Alternatives (January, 2011) in Section A.2, Transportation Demand Management / Transportation System Management. As such it could have been considered as part of the Group 1 alternatives. In our opinion, tolling is one of the strongest methods available to encourage increased use of transit and other modes and if applied judiciously, may affect the need for a new freeway such as the GTA West facility. At the very least, toll revenue would reduce the capital and operating costs of all alternatives, but particularly those associated with improvements to existing facilities. On the other hand, a broad tolling strategy may have unforeseen effects on municipal roads but none of this has been considered or commented on in a meaningful way in the study. The report is silent on this solution, mentioning only that tolling other 400-series highways is beyond the scope of this study.

3. Highway 401 Widening Alternatives: The differences between Groups 3-1, 4-2 and 4-3 alternatives appear quite small. The major differences are in the costs associated with the Highway 401 widening impacts associated with Group 3-1 and the improved support for local development and planning provided by having more proximate access to a 400-series highway associated with Groups 4-2 and 4-3.

We have compared these three Options in terms of the numbers of lanes, recommended cross sections, including use of core - collector systems for the widened Highway 401, as well as the approximate interchange spacing that exists now and that would exist under each option.

The only major difference in lane configuration between Groups 4-2 and 4-3 is the requirement in Group 4-2 for an added lane in each direction on Highway 401 west of Highway 407/ETR.

4. Highway 401/407 Interchange Design: We note that the Dillon review of alternative interchange designs between the GTA West facility and Highway 401/407/ETR provided options that would be constructed within the area east of 9th Line. This would significantly reduce the required area of protection associated with the zoned employment corridor and as such should be pursued with MTO prior to finalizing Stage 1.
5. Group 4-2 vs 4-3: The GTA West study indicates a need to provide a 12-lane core - collector facility with Group 4-2 in the section west of the James Snow Parkway. This requirement is again noted in the Briefing Notes provided to Halton Region, dated April 14, 2011. These notes also provide a typical cross section for 12-lane core - collector system with HOV lanes and note an ultimate right-of-way width of 108m. The Briefing Notes indicate that the existing right-of-way west of James Snow Parkway will not accommodate



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Date June 22, 2011
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anything greater than a 10-lane cross section without this right-of-way widening.

On review of the typical cross section for the core - collector system, we note that the proposed cross section is rural in nature, or open ditch type of treatment. If an urban cross section is used, a reduced right-of-way requirement would be obtained. The existing Highway 401 right-of-way west of the James Snow Parkway is estimated to be approximately 92m, with existing commercial buildings located very close, if not on, the property line. It may be possible to construct a 12-lane core - collector system through Milton, with an urban treatment. This alternative should be examined in greater detail and evaluated against Group 4-3.

6. The Interplay between Groups 4-4 and the Mid-Peninsula Corridor: Table B-5 in Appendix B, Assessment of Multi-Modal Alternatives, indicates the following under the Economy factor in reference to Alternative 4-4:

"This alternative provides significantly improved access to eco-recreational areas (i.e., Forks of the Credit, Palgrave, Albion Hills, Terra Cotta, Elora Gorge, etc.), many of which are located along the Niagara Escarpment. However, this alternative does not provide a direct link to the Greater Golden Horseshoe south of the study area."

The TDS report fails to mention how the results of the two planning studies (Niagara to GTA and GTA West) will be tied together. Eliminating groups of alternatives such as Group 4-4 and others at this stage implies certain connection constraints on the other study and vice versa. A more prudent approach may be to rank the groups of alternatives in each study and undertake a second level of assessment and evaluation that marries the rankings and preferences of the two studies together.

Schedule 6 of *Places To Grow, Moving Goods*, identifies future transportation corridors that are located, for the most part around the escarpment area and link together in the area of Highway 6 and minimize impact to the escarpment areas. Attempting to link these two corridors together in the area of Highway 6 not only brings them together in a very environmentally sensitive area, it is not consistent with the interregional transit network identified on Schedule 5, *Moving People – Transit* and the goal of improving linkages between the communities to the west of the GTA. Corridors that tie together more in a ring similar to the interregional transit schedule may be a more appropriate configuration, but this requires that the alternative corridor evaluation of the two studies be conducted concurrently and in an integrated fashion.