

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](mailto: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 willingness to address public concerns, based on fully understanding the likely or potential

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 9<sup>th</sup>, 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



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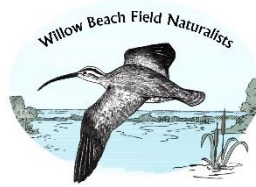
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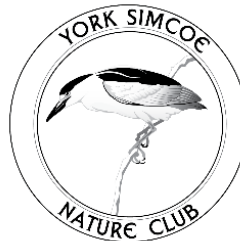
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Cc: Impact Assessment Agency of Canada