

Section III – Items for the Information of the Board

TO: Chair and Members of the Board of Directors
Meeting #3/20, Friday, April 24, 2020

FROM: Sameer Dhalla, Director, Development and Engineering Services

RE: **NORTHWEST GREATER TORONTO AREA (GTA) TRANSMISSION
CORRIDOR IDENTIFICATION STUDY**

KEY ISSUE

To provide information on the Ministry of Energy, Northern Development and Mines (ENDM) and the Independent Electricity System Operator's (IESO) Northwest Greater Toronto Area (GTA) Transmission Corridor Identification Study.

RECOMMENDATION

WHEREAS on January 24, 2020 Toronto and Region Conservation Authority (TRCA) staff advised TRCA Board of Directors that the Ministry of Energy, Northern Development and Mines (ENDM) together with the Province's electricity system planner, the Independent Electricity System Operator (IESO), had initiated the Northwest Greater Toronto Area (GTA) Transmission Corridor Identification Study to protect lands for future transmission infrastructure;

WHEREAS the general study area for the Northwest GTA Transmission Corridor largely corresponds to the Ministry of Transportation's (MTO) narrowed 2019 Focused Analysis Area (FAA) for the GTA West Transportation Corridor Route Planning and Environmental Assessment (EA) Study;

WHEREAS the Province is seeking feedback on the narrowed study area and guiding principles in conducting the transmission study through Environmental Registry of Ontario (ERO) Posting #019-1503 by May 7, 2020;

AND WHEREAS the Province is seeking feedback on early access to land for environmental studies on transmission projects through ERO Posting #019-1371 by April 30, 2020;

IT IS RECOMMENDED THAT this staff report and preliminary comments on the ERO postings be received by the Board of Directors for information.

BACKGROUND

In June 2019, ENDM and the Province's electricity system planner, IESO, initiated the Northwest GTA Transmission Corridor Identification Study in order to identify and protect a transmission corridor to support growing demand for electricity in the western GTA, should the need arise. The starting point for the Northwest GTA Transmission Corridor Identification Study was MTO's 2015 FAA.

On January 24, 2020, staff reported to the TRCA Board of Directors Meeting #11/19, highlighting TRCA concerns and recommendations based on available materials associated with MTO's GTA West Transportation Corridor Route Planning and EA Study (hereafter "GTA West Highway EA"). Amended Resolution #A233/19 along with the full Board report is

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available on the [TRCA website](#). While the focus of the report was the GTA West Highway EA, staff also identified ENDM and IESO's transmission corridor study, due to the potential for cumulative impacts that these parallel infrastructure corridors could have related to TRCA interests.

Given that these parallel studies are tied to the outcome of one another, several provisions of the Resolution and [Recommendations](#) made in the Board of Directors report also apply to the new transmission corridor including, but not limited to:

Excerpt from Resolution #A233/19

THAT TRCA staff continue to work with MTO staff and municipal partners through the Regulatory Agency Advisory Group, through the Greenbelt Transportation Advisory Group, and through an established working group with TRCA, other affected conservation authorities, municipalities and provincial and federal ministries, to address concerns related to potential alignment changes to the technically preferred route to accommodate development and community interests, as well as concerns related to the preferred design alternatives, including concerns related but not limited to: watercourse and wildlife crossings and trail connections, flood and erosion control, stormwater management, vegetation removals, natural heritage restoration and compensation, land acquisition and archaeology, and climate resiliency;

THAT the 32 Recommendations contained within this report and in Appendix 1 to this report be approved for review by MTO;

Recommendation:

- 2. MTO and ENDM/IESO confirm efforts to coordinate their independent studies and ensure negative impacts are fully assessed and minimized wherever practicable.*

ENVIRONMENTAL REGISTRY OF ONTARIO (ERO) POSTING #019-1503

On March 23, 2020, ENDM posted a proposal on the [\(ERO\)](#) seeking feedback by May 7, 2020 on a proposed narrowed study area (Attachment 1), and the guiding principles regarding the Northwest GTA Transmission Corridor Identification Study. The outcome of the ENDM/IESO study will be a recommendation regarding land to be preserved for future transmission infrastructure and protected from development or other purposes. Any future electricity transmission development in the area would be subject to EA Act requirements and other applicable regulatory approvals, including those through the Ontario Energy Board (OEB). While the Northwest GTA Transmission Corridor Identification Study is underway, the study area is subject to protection under the policies in the Provincial Policy Statement (PPS), 2020 (in effect on May 1, 2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

This ERO posting poses two questions:

- Are you aware of potential barriers or issues that may be associated with the proposed narrowed area of interest?
- Are there other principles we should consider in conducting the study?

A detailed response to the ERO posting will be prepared by TRCA staff under separate cover. However, our preliminary comments largely align with staff's comments on the GTA West Highway EA and are provided below.

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Narrowed Study Area

As illustrated, the proposed transmission corridor will generally be located within MTO's narrowed 2019 FAA. Although impacts associated with a transmission corridor will be different from those for a new highway, given the location of the narrowed area of interest, many of the concerns identified in the January 24, 2020 Board of Directors report will apply.

It will be imperative that the transmission corridor and associated infrastructure be sited to avoid risks to property, as a result of flood and erosion hazards scattered throughout the FAA. Not only should infrastructure be located outside of natural hazards areas, but often times associated works result in significant impacts to valley systems, including the potential to impact valley slopes and exacerbate erosion issues. Natural hazards associated with flooding and erosion will need to be considered within the ENDM planning process and risks properly managed in any subsequent EAs. It is anticipated that TRCA will continue to be engaged throughout this planning process to ensure close coordination as the location of the transmission corridor is further refined.

Proposed Guiding Principles

Through the [ERO posting](#), ENDM is seeking feedback on the following guiding principles. The principles are described as being informed by provincial legislation, policies and technical planning documents to support the identification of a future corridor:

1. Co-locate with other linear infrastructure.
2. Plan for the most cost-effective outcome.
3. Minimize impacts to natural heritage, agricultural and hydrological features consistent with provincial policies.
4. Minimize impacts on built up areas.
5. Provide flexibility for the future.

1. *Co-locate with other linear infrastructure*

The PPS supports the co-location of linear infrastructure, where appropriate, to potentially mitigate impacts to surrounding agricultural land and environmentally sensitive areas. ENDM has identified that since planning is underway for MTO's GTA West Highway EA, that this offers an opportunity to consider co-location with the transmission study. It is important to note, however, that these studies are independent of one another and will proceed through two separate processes.

While TRCA staff generally supports co-location of infrastructure, staff is also concerned with the potential cumulative impacts that these two infrastructure projects will have on the natural heritage system (NHS). TRCA staff are available to work with both proponents to minimize these impacts, wherever practicable.

2. *Plan for the most cost-effective outcome*

TRCA is supportive of corridor route planning that minimizes costs, to the extent feasible. However, factors such as identifying the shortest geographic route for instance may not achieve desired results considering necessary connection points, and challenges with alignments through sensitive or possibly difficult to construct areas. It is anticipated that a fulsome analysis that considers a range of factors will determine the most cost-efficient outcome.

3. *Minimize impacts to natural heritage, agricultural and hydrological features consistent with provincial policies*

Development pressures within TRCA's jurisdiction are resulting in added stressors to the

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few remaining natural systems within our jurisdiction, and it will be extremely important to ensure that impacts to the form and function of those natural corridors are avoided, to the extent possible. It is expected that construction of a new transmission corridor will result in significant vegetation and forest removals, with limited opportunity to replace lost habitat due to vegetation management requirements along these types of corridors. Furthermore, new transmission infrastructure has the potential to result in the removal of sensitive watercourses and wetlands, often with associated impacts to valley systems.

The alignment and design of the transmission corridor will need to consider the numerous valley and stream crossings within the study area and associated natural hazards (flood and erosion hazards). As such, the principle of avoiding flood and erosion hazards should also be included.

4. Minimize impacts on built up areas

As identified in the January 24, 2020 Board of Directors report, TRCA has worked closely with municipalities and the development industry over the past several years to protect significant natural features through municipal planning processes, and to convey lands into public ownership. It will be imperative that those negotiations and agreements be considered through this process.

5. Provide flexibility for the future

It is expected that the impacts of a new transmission corridor will result in significant losses to the NHS including unavoidable impacts to forest and wetland communities, with limited opportunity to restore the corridor to its full extent after construction. As restoration efforts within a transmission corridor may not be able to fully re-establish lost features and functions, habitat losses will need to be considered and compensated for to the extent possible. This also provides a unique opportunity, similar to that of [The Meadoway](#) project, to enhance biodiversity by maximizing naturalization and restoration efforts within the corridor, and by providing trail linkages along with new active transportation uses, subject to regulations/requirements within the corridor.

ERO POSTING #019-1371

On a related note, on March 2, 2020, ENDM posted a proposal on the [\(ERO\)](#) to give the OEB the authority to grant, under specific circumstances, earlier access to land to electricity transmission project proponents for the purpose of conducting preliminary environmental studies, prior to applying for Leave to Construct. It is anticipated that access to TRCA lands will be required to conduct these studies in multiple locations.

Correspondence was sent earlier this year by TRCA field staff requesting permission to enter private lands to complete annual terrestrial biological inventories across the region, including along the MTO alignment alternatives within the FAA. It is our understanding that MTO consultants have requested similar permissions to enter lands for investigations within the same general area.

Given that the MTO 2019 FAA is generally the same for the proposed transmission narrowed area of interest, it is recommended that efforts be coordinated among all agencies to avoid duplication of effort and delays, and that TRCA field staff also be given early access to lands to complete necessary investigations, as needed. Close coordination with TRCA archaeology staff will also be necessary to complete investigations on TRCA lands for any required ground disturbances.

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A detailed response to this ERO posting will be prepared by TRCA staff under separate cover and submitted by the closing date of April 30, 2020.

NEXT STEPS

TRCA's response to ERO #019-1503 posting will provide requested feedback on the guiding principles and potential barriers or issues that may be associated with the proposed narrowed area of interest. The ENDM and IESO are proposing to align the timing of their study with milestones related to MTO's GTA West Highway EA. However, because MTO has yet to confirm a preferred route, it is unclear at this time where exactly the final alignment of the highway will be located, and ultimately how the new transmission corridor will align with the location of the highway. Staff will advise of this concern in its comments through the ERO process.

It is anticipated that the cumulative effects of these two large infrastructure projects will result in extensive and widespread impacts within the Etobicoke Creek and Humber River Watersheds. As is standard practice, TRCA staff will support access to TRCA lands for the required environmental studies to be completed and will provide advice as to our standard requirements for this process. Additionally, staff will continue to report back to the Board of Directors on this project, as well as the GTA West Highway EA at key milestones.

Relationship to Building the Living City, the TRCA 2013-2022 Strategic Plan

This report supports the following strategies set forth in the TRCA 2013-2022 Strategic Plan:

Strategy 2 – Manage our regional water resources for current and future generations

Strategy 4 – Create complete communities that integrate nature and the built environment

Strategy 7 – Build partnerships and new business models

Strategy 8 – Gather and share the best sustainability knowledge

Strategy 12 – Facilitate a region-wide approach to sustainability

FINANCIAL DETAILS

National Energy Board (NEB) and OEB Applications are a matter of exclusive federal or provincial jurisdiction, respectively, with the OEB itself being responsible for all decisions. While there are no provisions that would allow TRCA to charge review fees for participation in an NEB or OEB process, if conditions for NEB or OEB approval specifically require TRCA involvement, appropriate fees will be negotiated on a project-specific basis. Should this project move to an EA, the appropriate review fee will be charged.

DETAILS OF WORK TO BE DONE

- TRCA staff will provide formal responses through the provincial ERO postings. Relevant [recommendations](#) from the GTA West Highway EA will inform these responses.
- TRCA staff will continue to work with and provide feedback to ENDM and IESO as new information is received and will report back to the TRCA Board of Directors once further information becomes available.

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Date: April 1, 2020

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Attachment 1: Proposed Transmission Narrowed Area of Interest versus MTO Focused Analysis Area