



Possibility grows here.

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January 6, 2026

To: Highway 413 Project Team,

Re: Highway 413 Draft Environmental Impact Assessment Report

The Greenbelt Foundation appreciates the opportunity to provide comments on the Highway 413 Draft Environmental Impact Assessment Report (EIAR).

Given the length of the report and condensed comment period, we are providing preliminary comments and underscore the need for greater consideration of the report's contents and conclusions. Our comments also build on previous feedback we submitted through [ERO 019-9213](#) on the Highway 413 Act, 2024, which included:

- Linear infrastructure projects in the Greenbelt must clearly demonstrate a significant public need, lack of reasonable alternatives outside the Greenbelt, and adherence to best practices for minimizing environmental impacts.
- The need for the Province to conduct comprehensive studies to understand the potential impacts of this project and develop innovative mitigation measures.
- Project timelines that allow for meaningful and effective Indigenous consultation processes.
- The standards of Greenbelt Plan policies should continue to apply to the planning and development of highways in the Greenbelt, including strict but reasonable conditions for planning and constructing linear infrastructure that protect the region's environmental and agricultural integrity from adverse impacts.

Addressing Risks from the Construction and Operation of Highway 413

Highway 413 is intended to span 59 kilometers of new highway infrastructure, connecting urban growth centres from Mississauga to Vaughn. The route will cross farmland, forests, wetlands, and waterways including the Humber and Credit Rivers, and cut through 400 acres of Greenbelt lands. The EIAR report identifies significant and wide-ranging impacts to agriculture and natural systems arising from construction and ongoing operations, including consequences for wildlife, major water systems, and adjacent and downstream communities. In light of these findings, the Province should update the project's cost-benefit analysis and extend consultation on the mitigation measures outlined in the EIAR to ensure risks are appropriately avoided and mitigated.

The EIAR outlines the following impacts that will affect interconnected agricultural, natural heritage, and water resource systems both within and beyond the Greenbelt and require actions to mitigate risks:

- The construction of new structural elements, including:
 - 127 conventional bridges (underpasses, overpasses, ramps, and watercourses).

- 36 interchanges with major highways.
 - 8 major river structures on the Credit River and Humber River.
 - 63 structural culverts.
 - 59 stormwater ponds.
 - 53 bridges over watercourses.
- A loss of 400 acres of Greenbelt lands, followed by fragmentation and degradation of systems on adjacent lands.
 - A loss of 1,928 acres of prime agricultural land in Caledon, Vaughn, Milton, and Halton Hills.
 - The agricultural viability of remaining farmland will be limited due to land severances and the resulting reduction in parcel size, irregular parcel shape, and access issues.
 - Crossings of the Greenbelt's Urban River Valleys at the Humber River and Credit River will increase erosion, stormwater runoff, negatively impact water quality, and result in the loss and fragmentation of wildlife habitat and connectivity, including the habitat of at least 20 species at risk.
 - Possible impacts to drinking water from the application of road salt and commercial fertilizer, and the handling and storage of fuel.
 - The long-term accessibility of recreational activities will be maintained, but the quality of experiences may be impacted by growth, development, and noise from the highway.

Protecting the Greenbelt

Since it was established in 2005, the Greenbelt has been highly effective in preventing the loss of farmland. However, the anticipated loss of 400 acres of prime agricultural lands identified in the EIAR will exceed the total amount of Greenbelt farmland lost over the past 20 years. This loss and related agricultural system fragmentation will affect the broader agriculture and agri-food sector, a key driver of Ontario's economy. It will also significantly impact critical ecological systems and functions that support resilient communities, providing water filtration, flood mitigation, clean water supplies, and landscape connectivity necessary to sustain wildlife and biodiversity.

The EIAR references and applies risk mitigation measures set out in the *Guideline for Planning and Design of the GTA West Corridor Through the Greenbelt*, published in 2013. The science, understanding and use of natural assets, stormwater and watershed management, and green infrastructure and other conservation-based mitigation solutions have advanced significantly over the past 12 years. Over the same period system stressors have become more significant including increasing erosion and flood risks to communities due to increased urbanization, climate change and other factors.

While the Greenbelt Plan allows for linear infrastructure under certain conditions, the EIAR does not adequately consider the cumulative effects of this and other infrastructure projects on the Greenbelt, as required by policy. To maintain the integrity of Greenbelt systems, and support resilient economies and communities, it is critical that the Province update the 2013 Greenbelt Guideline to better assess and mitigate cumulative impacts and ensure the use of modern and

innovative avoidance and mitigation measures are used, such as wetland restoration and rehabilitation in place of conventional stormwater ponds.

Addressing Impacts on the Agricultural Economy

Ontario's agri-food sector contributes \$50 billion to Ontario's economy every year. Agriculture is the predominant land use in the Greenbelt. While only 7% of Ontario's farmland is in the Greenbelt, it contains 50% of the Province's fruit acreage and 11% of its vegetable acreage. Nearly 60% of Ontario's food processing capacity is located within or near the Greenbelt, creating a robust agri-food network that links farmers to processors, distributors, and consumers.

The EIAR states that the highway "...will lead to irreversible loss of designated agricultural lands and will affect agricultural tile drainage systems..." that will "reduce Ontario's ability to grow its own food, will limit food security, and will increase food prices; the extent of which is unknown."

The report states that beyond the loss of 1,928 acres of prime agricultural land, the agricultural viability of adjacent farmland will be limited due to land severances and the resulting reduction in parcel size, irregular parcel shape, and access issues. Prime agricultural lands are a finite resource that require protection from development, both within and outside of the Greenbelt.

The EIAR includes an Agricultural Impact Assessment, which found that 90 agricultural parcels will be severed, including 36 parcels in the prime agricultural area. An additional 172 parcels will become landlocked, including 67 parcels in the prime agricultural area. There will also be a net loss of investments in agricultural infrastructure, a loss of the use of groundwater wells, and changes to soil drainage, surface drainage, and stormwater management.

The EIAR states that these impacts are unavoidable. The Foundation urges the Province to engage with farm owners and operators, and key stakeholders, such as the Ontario Federation of Agriculture, to develop appropriate avoidance and mitigation measures in accordance with the [guidance](#) provided by the Ontario Ministry of Agriculture, Food and Agribusiness.

Supporting Successful Growth and Complete Communities

The Provincial Planning Statement, 2024 and Greenbelt Plans establish a planning and policy framework for the creation of complete, compact communities in Ontario. Complete communities deliver significant socio-economic benefits to residents, support a diverse housing stock that promotes affordability, and enables more cost-effective growth patterns. Highways are powerful drivers of development, and their location can either support or undermine the achievement of complete community objectives.

The 2017 *GTA West Corridor Advisory Panel Report* found that the proposed highway could undermine the creation of complete communities, a concern further examined in the EIAR. The location of the highway is expected to increase development pressures within the Greenbelt and adjacent rural lands that are not intended for urban development.

Many of the lands north of the proposed highway are rural. The EIAR identifies urban sprawl in Caledon as a key area of concern, noting that some rural lands not planned for urbanization would

be subject to development pressures. The report acknowledges that this outcome has met with strong public opposition, particularly due to concerns about farmland loss and the transformation of the landscape from rural to urban.

The Province should avoid infrastructure that will increase development pressures on the Greenbelt and strictly enforce rules that keep rural lands rural in accordance with the Greenbelt Plan, Provincial Planning Statement, municipal Official Plans and zoning bylaws.

Protecting Species at Risk

The highway will affect wildlife habitats including the habitat of at least 20 species at risk (SAR). Recent research indicates that the number of species at risk in Ontario has increased by 50% since 2004, while the number within the Greenbelt has risen by 68%. This trend underscores the Greenbelt's growing importance as a refuge for vulnerable species and highlights the intensifying pressures on surrounding ecosystems.

With the repeal of the Endangered Species Act and the introduction of the more permissive Species Conservation Act, the extent of protections for species at risk (SAR) and associated permitting requirements is unclear. Permitting requirements for federally protected species will be determined through the Bilateral Federal–Provincial Working Group. In this context, the Province should seek an external expert review of the EIA to ensure that all SAR have been appropriately identified and that effective mitigation measures—such as road ecology interventions and habitat restoration—are incorporated.

Addressing Concerns of Indigenous Communities

The EIA reports on the opposition and concerns of Indigenous communities to the project. We support their concerns and encourage the Province continue to meaningfully engage with Indigenous communities affected by this project and the following concerns:

- Air quality and climate change from cumulative development
- Loss of traditional activities including harvesting
- Impacts to human health and social wellbeing, including human trafficking
- Capacity issues for participation in the process
- Changes in legislation affecting consultation processes
- Impacts to burial grounds and cultural resources along historic routes
- Impacts to fish and fish habitat, and terrestrial ecosystems
- Impacts to the Greenbelt

As reported elsewhere, there is concern that consultations with Indigenous communities have been inadequate to date. The Province should continue to engage meaningfully with Indigenous communities affected by this project and uphold its Duty To Consult.

Recommendations

The strength of the Greenbelt lies within its permanence and policies that safeguard the integrity, connectivity, and health of agricultural, natural heritage, and water systems that Ontarians rely on for food, drinking water, flood protection, climate resilience, and jobs.

The EIAR identified significant impacts on the Greenbelt and adjacent systems. While the following recommendations are preliminary, the Foundation will continue to examine potential implications for the Greenbelt and request the opportunity to offer further input to the project team and provincial government. We also provide the following initial recommendations for the Province:

- Review the 2013 Greenbelt Guideline to ensure that modern and innovative approaches for impact avoidance and mitigation measures such as stormwater management, are included in the planning and design of the highway and effectively build resilience to climate change.
- Seriously consider the significant increase in federally and provincially listed species at risk in the Greenbelt and proceed with an external expert review of the EIAR to ensure all SAR are identified, along with appropriate mitigation measures.
- Continue to engage with farm owners, operators and key stakeholders, such as the Ontario Federation of Agriculture, to maximize avoidance opportunities and mitigation solutions and identify investment opportunities to ensure the continued viability of farming in the area.
- Take measures to prevent sprawl by strictly enforcing rules that support complete communities and keep rural lands rural in accordance with the Greenbelt Plan, Provincial Planning Statement, municipal Official Plans and zoning bylaws.
- Continue to meet with Indigenous communities to address their concerns.

Conclusion

Based on a preliminary review of the EIAR report and incorporation of the Greenbelt guidelines, the Foundation requests a meeting with the Province and project partners to better understand how the 2013 Greenbelt Guideline was incorporated in the design of this highway, and whether the guidelines reflect new science for stormwater and watershed management. More broadly, we also request more time for comment and consultation to enable a more fulsome analysis of the impacts, mitigation measures, costs, and benefits of this project.

Thank you for consideration of this submission. We welcome and encourage further engagement on these issues.

Sincerely,



Edward McDonnell
Chief Executive Officer