



**Citizens Opposed to Paving the Escarpment**

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URS Canada Inc.  
75 Commerce Valley Drive East  
Markham, Ontario  
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Atten: Mr. Tyler Drygas  
Senior Environmental Planner  
NGTA Study Team

**RE: Comments on the Niagara to GTA Transportation Corridor  
Planning and Environment Assessment Study – Phase 1  
Public Information Centre # 4**

Having examined the current status of the Niagara to GTA (NGTA) Corridor project, we submit the following comments and call for action.

The new NGTA process has resulted in some excellent gains. We support the optimization of existing networks and new/expanded non-road infrastructure recommendations in principle.

**Disturbingly, the adherence to the outdated and illogical idea of building a new highway on the Niagara Escarpment from the 403 in Hamilton to the 407 in Burlington, has been put forth. We DO NOT support this option and call for its removal.**

**We recognize that the NGTA team operates within constraints. If given the freedom to be truly visionary, we believe they could have developed a far better option to meet transportation needs than building another highway on the escarpment. With the political will, this is still a possibility. With climate change, it is a necessity.**

Our reasoning for opposing the 403/407 highway option is as follows:

1. The highway would cut the Niagara Escarpment and the Green Belt area; a UNESCO Biosphere Reserve.
2. The economic reasons presented in support of the highway are not sound.

- a. As stated in the draft report on page 54: a new route would facilitate municipal development plans referring to Niagara's "Growth South" and Hamilton's airport development plans. The portion of highway from Niagara to Hamilton is no longer under consideration. As such, this argument is no longer relevant.
  - b. Neither trucks nor commuters are going to take a highway that detours 35km through the countryside when the QEW provides a direct link.
  - c. The probability that this would be a toll road further impacts the usage due to high costs already incurred by the trucking industry. Connection to a toll road would discourage goods movement. High costs would also discourage use by commuters. At today's 407 ETR prices, the toll for a 70km return trip would be: \$14.94 for a car; \$28.89 for a heavy unit; and \$44.83 for a heavy multiple unit. Given the pace of toll increases for the 407, it is safe to assume at least a 100% increase of these charges over the next 10 years.
  - d. On page 54, the assessment in support of a new highway states that it "will significantly alleviate future congestion levels for people and goods movement." This is illogical given that the congestion is in the GTA – not Flamborough. "This is a road starting nowhere going nowhere."
  - e. In the Citizens Advisory Group presentation it was stated that option #3 – widening of existing roads, was more economically beneficial because it serviced existing development better. Now it is claimed that a new highway is the better choice economically. It appears the intention is to develop escarpment land along the highway. Reference to the economic development of the corridor is scattered throughout the document: *"New corridors will have a larger footprint impact on the undisturbed environment, but effects can be mitigated through careful environmental planning and can provide new economic development opportunities." (Page 53)* This is not acceptable and is in contravention to the spirit of the Greenbelt, which purports to protect the land. It is also contrary to Places to Grow.
3. The word "slight" has been used by the NGTA team when describing the benefit of a new highway compared to maximizing existing roadways. A "slight" benefit is not good enough when one considers the language associated with building new infrastructure on the Green Belt. It is to be "essential". Also, the 403/407 highway would cut through the Greenbelt, an "area of protected green space, farmland and vibrant communities."
  4. The superficial examination rail and marine has received in this process is unacceptable. In 2005, COPE requested that the MTO seriously consider alternative modes of transportation including rail and marine. The response at that time was that the environmental assessment process

would stop if the alternatives they decided to use were not in their jurisdiction. Our concern that the rail and marine options had little chance of survival in this study have proved correct. The draft report states that “the potential of all transportation modes have been explored”. (Page 51) This is not true. The advancements in transportation planning have been in those areas under provincial jurisdiction (transit). Those issues requiring meaningful interaction with federal counterparts have been set-aside. It is our position that the MTO has not fulfilled their obligations regarding exploration of these alternatives. We expect and call for meaningful engagement from both the provincial and federal organizations responsible for rail and marine.

5. COPE requests details on the numeric weighting system used to prioritize the various alternatives. Given what has been excluded from this process, environmental and community factors have been severely undervalued. The use of green dots in various sizes to indicate a “reasoned argument” approach in conveying information is confusing and masks important issues such of the lack of quantitative analysis for determining conclusions.
6. We believe the population and employment forecasts are inflated leading to the over estimation of transportation infrastructure requirements as well as unnecessary spending of taxpayer dollars. COPE calls on the appropriate government organizations, including the Ministry of Energy and Infrastructure, to correct the Places to Grow population projections. This would lead to the realignment of the transportation needs projections.
7. When modeling transportation needs, the inflated forecasting numbers were the sole set utilized. For a project of this size, it is reasonable and responsible to calculate need based on several scenarios. Furthermore, there has been no sensitivity analysis on the demand forecasting. This is unacceptable. It is standard procedure in the industry to conduct sensitivity analysis on model inputs. COPE calls for the MTO to adhere to industry standards and conduct sensitivity analysis and run additional models based on lower population forecasting.
8. The methodology for measuring air pollution is of great concern. We understand that a threshold has been set, and as one geographical area approaches this critical threshold, it is deemed to be more advantageous to hold pollution level there, but allow it to increase in another area that hasn't attained as high a level. Because the rural areas are not yet as polluted as other parts of the GTA, the report states that the risk air pollution poses to them is slight. This is very cynical and distorted reasoning. Rather than curtailing pollution for all and working to reduce green house gases - the approach is to pollute everywhere.

Also, the model used for the highway is a large geographical area; allowing the team to state that the pollution impact will not be significant due to assumed dispersal of pollutants. We challenge your assumption of "dispersal". It does not give due weight to Environment Canada's documented increase in smog days during which few or no pollutants are dispersed because of absence of wind. In view of more frequent and prolonged heat waves, this situation will get worse. Furthermore, it does not appear to take into account that the highway will remove thousands of trees, which presently mitigate air pollution. It also assumes that traffic would flow at a constant speed when, in reality, there will be congestion due to accidents and unforeseen circumstances. At such times heavy diesel trucks emit more cancer-causing agents due to decompression braking.

The Air Quality Report assumption that the area, for which the highway is planned, will remain "rural" is not in sync with other sections of the team's report. The expected outcome is a change in the rural character due to increased urbanization and the projected "economic development opportunities" (p.53). This manipulation is repugnant and irresponsible.

We expect the team to incorporate into their report how air pollution levels of a highway will impact local communities and the subsequent health cost. For example, the "**Alton**" Community in Burlington would be greatly affected by the proximity of the highway proposed to connect to 407 ERT at Walkers Line.

9. Part of the reasoning supporting the new highway versus widening of existing routes was the number of properties impacted. We challenge the team's findings. The impact calculated to the rural community is exceedingly low. Again, this further undermines the new corridor as a viable choice.
10. The report identifies a new highway as the more expensive option compared to group # 3. It would be irresponsible for this government to needlessly spend billions of dollars for a highway when faced with the public debt at a critical level. Even if the highway is a toll road, the cost is still imposed on the taxpayer, just through a different means. COPE expects our government to exercise fiscal responsibility. Also, COPE requests copies of any documents pertaining to talks with private partners on the possibility of building the 403/407 highway as a toll road.
11. This study fails to recognize climate change. Given the increased impact it is having globally, the need to factor in the huge impact of climate change is becoming increasingly apparent. As per the U.S. National

Oceanic and Atmospheric Administration report released recently, “a comprehensive review of key climate indicators confirms the world is warming and the past decade was the warmest on record.” The past several weeks in Russia, where they are experiencing a drastic heat wave with sustained temperatures of more than 30 degrees Celsius, demonstrates the devastating impact of changing weather patterns. Russia has lost millions of acres of wheat crops.

12. COPE is concerned with the lack of recognition of peak oil. The general consensus is that it will occur some time between 2013 and 2020 and the MTO is talking about a highway for 2031. This calls into question the assumptions regarding vehicle-operating costs. A 200% increase has been assumed including all operating costs combined. We believe it is low considering the continued increase in the cost of gasoline. We also want the cost of gasoline separated from other operating costs and several demand models run assuming a cost increase of 200%, 300%, and 400%. Given that demand in 2031 is being forecast, this is reasonable and responsible.
13. The lack of recognition of the importance of farmland and the ability to feed ourselves is baffling and of great concern. In this process prime agricultural land has been severely under-valued. The “reasoned arguments” put forth by the team supporting the new highway highlight economic development of the new corridor meaning the urbanization of rural lands. They don’t include the need to retain the agricultural land-base and protect farming. Nor is the capacity to feed the population assigned worth. Considering soaring oil prices and the impact of climate change on crop production, the economic value of food production in 30 years is positioned to be enormous; dwarfing the “slight” and questionable economic benefits considered in this report. Disturbingly, the food production economic factor has been excluded. If it were factored in, it would completely negate the idea of building a highway. COPE calls for agricultural valuation reflecting the importance of this non-renewable resource.
14. There has only been superficial recognition of the environmental impact a highway would have on the Niagara Escarpment, our World Biosphere Reserve, and beyond. Light acknowledgement to vital ecosystem functions when wetlands, headwaters, ground water, warm/cold streams, woodlots, air quality and Species at Risk are impacted is insufficient. COPE calls for ecosystem valuation reflecting the importance of these life-sustaining systems. They warrant top priority.
15. COPE is concerned with the omission of an independent technical peer review. Given the size of this project, this is a major oversight.

16. COPE is concerned with the disregard for other Provincial Planning documents such as Ontario's Bio Diversity Strategy.

The NGTA team has failed to substantiate the need for a new highway on the Niagara escarpment from the 403 in Hamilton to the 407 in Burlington. To move forward with the project would be irresponsible both environmentally and fiscally.