



**Stop the Escarpment Highway Coalition
and
Citizens Opposed to Paving the Escarpment**

P.O. Box 20014, 2211 Brant St.
Burlington, ON, L7P 0A4
www.stophighway.com

June 6, 2011

NGTA Study Team
C/O URS Canada Inc
75 Commerce Valley Drive East
Markham, Ontario
L3T 7N9

**Re: Niagara to GTA Corridor Environmental Assessment Terms of Reference (Draft)
February 2011**

Having reviewed the Niagara to GTA Corridor Draft Transportation Development Strategy, February 2011, Citizens Opposed to Paving the Escarpment (COPE) and the Stop Escarpment Highway Coalition (SEHC) submit the following comments.

We acknowledge that population and economic growth will continue in our region, and that transportation infrastructure investment is required to support this growth. However, we believe that future infrastructure investment needs to take a very different direction than in the past. This change in emphasis to transit and rail is driven by mounting evidence of the impacts our current transportation model is having on the environment, on our health and on the communities we live in. Our submission addresses specific issues in the Environmental Assessment (EA) which we believe require further analysis, areas which require a stronger prioritization of rail and transit and some areas beyond the scope of the EA.

We respectfully submit these comments along with the Natural Capital Study (May 2011) for review and inclusion in the Niagara GTA study as well as other infrastructure initiatives. We will continue to submit comments for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan McMaster".

Susan McMaster
Co-Chair
Citizens Opposed to Paving the Escarpment

Geoff Brock
Spokesperson
Stop Escarpment Highway Coalition

Submission
Stop the Escarpment Highway Coalition
and
Citizens Opposed to Paving the Escarpment

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We Fully Support

- ❑ Our government's decision to remove Halton corridor, as shown in the Regional Official Plan Amendment 38 submitted by the Ministry of Municipal Affairs and Housing on October 27, 2010, from Halton Region's official plan.
- ❑ The continued study of the Flamborough / Burlington corridor in the West study area. We expect that, with appropriate level of concern for the future and thorough consideration of all factors, consideration of a highway in this area will be removed as an option.
- ❑ The recognition of the "Complexity and inter-relationship of the environmental, social, and economic factors" in the West study area. We expect that these factors will be given the elevated priority they warrant BEFORE any decision is made – thus removing any consideration of building a highway in the Flamborough / Burlington area.
- ❑ The Ministry of Transportation's (MTO) determination that "more focused analysis and assessment should be undertaken to better understand and compare the relative advantages and disadvantages of the transportation options and corridor alternatives in the Halton-Hamilton area". COPE/SEHC's analysis indicates the MTO research to date is incomplete, based on outmoded population and job creation projections and does not give adequate consideration to natural heritage area impact and the loss of agricultural lands.

Frame of Reference for Future Study

- ❑ We believe that a comprehensive review of the issues regarding the NGTA highway go beyond the limits imposed by the existing EA terms of reference.
- ❑ We recognize that the project team is constrained to dealing with issues covered by the EA terms of reference that have been defined. The SEHC and COPE will be providing feedback to, and are requesting additional study from, the Provincial and Federal governments as part of our involvement in the NGTA project.
- ❑ As part of our response, we have included items here which may be broader in scope than those defined in the existing terms of reference, but which we believe are necessary for a comprehensive review of the issue.

Policy Recommendations

Create One Overriding Agency Responsible for Transport Planning

- ❑ We recommend that both the Federal and Provincial governments create agencies with a mandate to set transportation strategy at a broad enough level to capture supra-regional issues.
- ❑ The current system of transport planning is piece-meal and lacks the capacity to consider and meaningfully address the many important factors related to this issue. For example, the area of focus for Metrolinx terminates at Hamilton and municipal transit systems lack any real coordination or inter related strategic planning. This boundary is limiting to progressive transit and transport planning and underscores the need for an overriding transport planning authority that would cross municipal boundaries and government lines, including:
 - Province to Province
 - Federal to Provincial
 - Provincial to Municipal
- ❑ We recommend an approach that eradicates the planning in isolation that is weakening the environmental integrity of Ontario and Canada. The goals would be to build a world-class transit and transport system that recognizes the impact of Climate Change and sustainably services the needs of future generations. Given that the “Transportation Sector accounts for about one quarter of Canada's total green-house gas emissions and is the largest source of greenhouse gas emissions in Canada” (Environment Canada) a joint and concerted effort in sustainable transport planning is warranted.
- ❑ Furthermore, Ontario is aiming to reduce its Greenhouse Gas emissions by 15% by the year 2020 (Ontario Ministry of The Environment). Even with the shift in the vehicle fleet to hybrid / electric, building more highways will add to pollution totals not reduce them. This governmental disconnect is another point that clearly highlights the need for an overriding agency.

Advocacy for a Comprehensive National Transportation Policy

- ❑ The SEHC will lobby the Federal Government to create a **National Transport Strategy**. Canada is one of the few countries lacking a National Transport Strategy and, therefore, the cohesiveness necessary to plan transport needs intelligently and effectively for current and future generations.

Transportation Planning Should Follow Urban Design

- ❑ Transportation infrastructure has led, not followed, the urban development process in Southern Ontario. More regional roads have supported more sprawl, and made long commutes a normal way of living in our region. This phenomena leads to the self-fulfilling prophecy of “if you build it, they will come”.
- ❑ Better municipal visioning in creating urban development plans should lead the transportation infrastructure process, not the other way around. Technology and manufacturing shifts offshore have changed the nature of work in Canada. Local industry with local workforces, work at home roles, and greater intensification require transit. Transportation policy needs to shift the freight mix from road to rail, given rail’s narrower corridors, lower noise, and lower CO2 impacts.

Couple Transport and Land Use Planning

- ❑ To ensure the importance of protecting our land eco-systems from highways and the subsequent pressure from developers and urban sprawl, plan transport and land use in concert with protection as the overriding principal.

Protect the Value and Purpose of the Greenbelt Plan and the Niagara Escarpment

- ❑ Protect the Greenbelt and the Niagara Escarpment from highways that open it up for development – benefiting the few. The area’s significance is recognized world-wide and requires protection.
- ❑ Include the Ministry of Environment (MOE) in the next phase of the process; earlier than currently planned in the NGTA project. Their input should include the needs identified in this submission along with the associated priority status. This would allow the MOE input in a timely fashion – not after the fact as a rubber stamp.
- ❑ The SEHC will be recommending to the appropriate agencies to tighten the loopholes in the Greenbelt legislation and that the MTO no longer be granted exemptions from the Greenbelt Act in order to allow building new corridors. There is no essential need for a corridor that warrants scarring this natural and ecologically significant resource.

Further Analysis Required

Need For Data Validation

- ❑ Out dated population and employment forecasting. Based on the Places to Grow Act 2005, the study assumes Hamilton’s population will grow by 120,000 in 2031 and generate 90,000 new jobs. Given more current statistics on actual growth in the area, these forecasts are overstated. Furthermore, to date no sensitivity analysis was completed on the impacts of these population and job projections on the demand forecasting. Given the size of the project, we request that the project team run more than one model reflecting lower growth estimates - which is in keeping with industry standard. A Monte-Carlo analysis of various growth estimates should be completed and modeled to evaluate a range of future plausible demands on our transportation network, not just a single estimate based on the inflated growth estimates. This is standard practice in scientific and engineering studies and we expect this type of rigorous analysis from our government
- ❑ Hamilton Airport – volume of flights is grossly over-estimated. As recently reported, Hamilton Airport is operating at less than 50% of the flight volume projected by the operators. This shortfall is not caused by the lack of a highway. The flight traffic shortfall is a result of overly optimistic forecasting, and a fundamental change in the economics of air transport. Road traffic generated by the airport will not materialize as currently claimed
- ❑ Insufficient data on trucking. As stated in the **NGTA Transportation Development Strategy** “the first priority of highway investment is to facilitate efficient goods movement.” There are other modes of transport to facilitate goods movement, such as rail, and we expect them to be seriously considered
- ❑ As stated in the Metrolinx report **The Big Move - GTHA Urban Freight Study Final Draft**: “Despite trucking’s importance in the GTHA, not nearly enough is known about it. There is no single source for comprehensive truck data including volumes, routes, origins and destinations. Despite several data collection efforts, only a partial view of the industry is available.”
- ❑ The NGTA study traffic congestion estimates are anecdotal. We recommend that a more quantitative approach if followed in future analysis.
- ❑ Modeling lacks rigour. We are pleased to see that the impacts of The Big Move were included in the NGTA Study and in the GGH Model’s Base Case. However, we believe that the modeling lacks rigor in its assumptions and are concerned that no sensitivity analysis was completed.

Given the extent of factors that have not been addressed, we do not agree that a “demonstrated need for additional roadway capacity” exists.

A Huge Expense Triggered on a Small, Highly Questionable Item Forecast for 2029

- ❑ As per Line 6001 in the Forecasting Travel Demand Analysis, corridor capacity is not exceeded until the year 2029. This small item triggers this entire project. With concerns for the validity of data, the use of questionable assumptions, the exclusion of pertinent factors and an overestimation of growth, to move ahead with this project without resolving these issues comes close to being irresponsible.
- ❑ Consideration should be given to deferring and monitoring the need for a new corridor in the West Area until the Growth Plan is updated; since the need is projected to occur near the end of the planning horizon time period.

Air Quality Study Deficient

- ❑ Based on the findings of Dr. David Pengelly, the RWDI Air Quality report completed for the NGTA corridor project was limited in scope. This narrow focus has resulted in underestimation of proposed road transportation impacts on human health.
 - Factors critical for health risk analyses are omitted.
 - RWDI relies on Ontario “criteria” to be protective of public health.
 - This narrow definition is insufficient considering studies such as the Canadian Medical Association 2008 study.
- ❑ To fully understand the cost of a transportation corridor, determining the impact to human health and subsequent health care costs must be included in the accounting. The study conducted to date is insufficient in doing so.

Any future study must include up-to-date data and realistic assumptions on health impacts.

- ❑ See Appendix C

Include Value of Ecosystems in Both the Economic and Community Categories

- ❑ To underscore the commitment of the COPE / SEHC to better infrastructure planning, we have commissioned a professional report valuating the ecosystems in the West Area.
- ❑ Watersheds provide goods and services for free but they must be protected. These services include Flood Protection, Clean Drinking Water Supply, Recreational Opportunities, and Habitat for Endangered Species. **The economic value provided by the watershed in the West Study area of Flamborough and Burlington represents close to a billion dollars in services annually.** This value has not been factored into the transportation corridor equation.
- ❑ See Natural Capital Study, June 1, 2011
- ❑ The extraordinary amount of services provided by our ecosystems must be included in any cost / benefit analysis of the NGTA corridor or any like project. To consider them in the decision-making process now will avoid costly consequences later that dwarf the supposed benefits.

Having taken on the responsibility of obtaining a valuation of the ecosystems in the NGTA West study area, we submit The Natural Capital Report to the MTO for inclusion in the study for the purposes of cost / benefit analysis as well as prioritizing ecosystems and the natural assets of the Niagara Escarpment.

Include Value of Agricultural Land in Both the Economic and Community Categories

- ❑ The ability to grow food has great value which has been ignored in this exercise. In Hamilton alone agriculture is a \$1 billion industry providing food and employment to the economy and yet it is slotted under the “Community” umbrella. Agriculture is currently a major economic engine in the area and will only grow in value as food supply dwindles due to Climate Change impacts.
- ❑ Given the amount of land lost to development over the last 40 years in this area, we will lose the ability to feed ourselves within 50 years if we continue at the same rate. If we keep pretending roads and development are the answer, our grandchildren will be reliant on food imports to sustain themselves, if available.
 - Only 5% of Canada’s land is prime agricultural land but more than half of it is right here in Southern Ontario, with the best combinations of soil, temperature and moisture to give us incredible choices for a variety, quality and quantity of foods, season after season.

- “Since 1966, over 6 million hectares of land in Canada and over 1.5 million hectares of land in Ontario have been lost from agriculture”
- ❑ Escalating transportation costs, proposed carbon taxes and consumer demand for local food, will improve the economics of local food production and increase the importance of the local agriculture industry. These changes will also decrease long haul truck traffic and must be included in the analysis.
- ❑ Due to favourable geographic location that positions us well to withstand the greatest impacts of Climate Change, the ability to provide a reliable, safe food supply will be of great value to those countries suffering more severe impacts such as drought and flooding. This opportunity for our economy should be factored into the analysis, not ignored.
- ❑ Food security: China, Switzerland and other Europeans countries have bought million of acres of California’s prime agricultural land and are looking elsewhere for more.

We recommend that the project team include the economic value of our prime agricultural land in the cost benefit analysis of the transportation study.

We recommend that the project team include the value of the ability to feed the domestic population as well as contribute to the world market a safe and reliable food supply as Climate Change continues to take its toll. Adopt the protection of farmland and food security as an overriding principle in the study process.

Update Flawed Assumptions: Fallacy of Highways

- ❑ Highway building does not drive economic development. As per a study conducted for the US Department of Transportation and the US Department of Housing and Urban Development, "no strong evidence exists demonstrating that beltways improve a metropolitan area's competitive advantage." Furthermore, “transportation economists generally agree that at the regional level, additional highway capacity offers little added value in terms of productivity, economic competitiveness, or efficiency.”

- ❑ Tremendous productivity gains resulted from infrastructure spending during the 1950s and 1960s. Those gains were achieved when the US lacked a network of modern highways, and Interstate construction as needed for basic connectivity to facilitate the flow of goods and services between regions, states, provinces; the entire continent. With completion of the Interstate system, economists found that returns on infrastructure investment diminished because the efficiency gains from this basic connectivity had mostly been captured.

Given the poor return on investment, major contribution of greenhouse gas emissions, the ecological value of these lands, and the inability to resolve long term transportation needs in light of rising fuel costs, the COPE / SEHC is calling for the removal of highways as a transport option on the Niagara Escarpment.

We recommend a strategy of growing transit and rail infrastructure, to be complemented with a maintain/enhance strategy for the existing road corridors.

Update Flawed Assumptions: “Peak Oil”

- ❑ “Peak Oil” means the cost of extracting oil is gradually becoming greater than what our economies can tolerate.” There is no longer an argument about whether the production of conventional oil has peaked. For example, Jeff Rubin, former chief economist for CIBC World Markets said in Toronto (13 May 2011):

“By the end of the year we’re looking at \$1.50 gasoline. The way Toronto will run with those prices will be very different from today. We’re going to start having to make some changes...Triple-digit oil prices will show us how to respond and hopefully our politicians get it. The fact is that, in the future, more people will be taking public transit and less people will be driving. That change won’t be a result of any alleged “War on the Car.”
The biggest war on the car is coming from \$2/litre fuel.”

The impact of “peak oil” must be factored into any transportation study. It further highlights the need to remove highways as an option.

Recommended Process Changes

Reasoned Arguments Approach in Decisions Making

- ❑ The Reasoned Argument (Expert Opinion) Method as outlined in the Terms of Reference is the primary evaluation method, yet it is the most open to

interpretation, vague in how it will be applied and lends itself to the most abuse.

We recommend that this be the secondary method and the Arithmetic Evaluation be the primary evaluation method (i.e. a full benefit-cost analysis).

- ❑ To highlight the limitations associated with relying solely on the expert opinions of the study consultants, the Draft Report has gone to great lengths to highlight the key issues with widening the 403 north of the LINC and the ecological importance of Cootes Paradise. Conversely, the value of the ecosystem goods and services provided by the rural watersheds in the West Study Area are largely ignored. With factual economic data, our Natural Capital Study has determined the Spencer, Grindstone, and Bronte Creek watersheds (those that would be directly impacted by Alternative 4-3 or 4-4) generate \$645 million annual in ecosystem goods and services, where the Cootes watershed only generates \$26.7 million per year (24 times more value for the rural watersheds). The value of preserving Cootes Paradise has been clearly stated in this process. The immense value of the rural watershed dwarfs that of Cootes Paradise and they too deserve protection.

Preserve the economic and ecological value of our rural watersheds.

- ❑ See Natural Capital Study - June 1, 2011
- ❑ This process must address all costs associated with alternatives. For example:
 - It must evaluate the impact on usage and cost if tolling is a possibility.
 - It should compare the cost of a new highway, in terms of construction costs, size of right of way and maintenance, to that of a new rail infrastructure.
 - It should estimate cost savings from using existing infrastructure.
 - It must factor in equalization equation to account for all government subsidies.
 - It should include the cost to taxpayers at federal, provincial and municipal level for servicing and maintenance of option.
 - It must include the cost to counteract short- and long-term effects of transportation choice (i.e.: degradation of ground water used as a source of rural drinking water, lost recreational amenities, increased health care cost, etc.).
 - It must evaluate the impact on usage and cost considering the ever increasing price of gas / oil.

It must value and consider all the ecosystem services lost, both directly due to the transportation corridor across the rural watersheds and indirectly due to near field and potential far field impacts, such as ground water contamination.

Continued Study of a Corridor in the Flamborough / Burlington Area Which Includes a Highway as an Option

- ❑ The location of a corridor / highway in the West Study Area is a flawed strategy since it does not address the fundamental cause of traffic congestion in the GTA. This fundamental cause is the lack of convenient cost effective alternatives for both freight and individual transportation. A highway investment will divert public funding from building a desperately needed regional transit system in support of expanding a highway network vulnerable to ever increasing gasoline costs.

Metrolinx – The Big Move

- ❑ Fund in full and build projects identified in The Big Move first as the priority over consideration of a new highway and to provide meaningful transportation options to citizens – beyond the car.

Data Omissions

Meaningful Engagement of the Federal Government and Consideration of Rail

- ❑ Rail must be given meaningful consideration as a transport option in this process. Given rail's ability to provide effective, efficient transport along with lower environmental impact when compared to roadways, the exclusion of rail as an option is unacceptable. Full engagement of Transport Canada is a necessity. Furthermore, the recent news that Bill Gates is now the biggest shareholder in Canadian National Rail should be a wake-up call. An extremely successful businessman known for forward thinking is putting money into rail. Our government should have been leading the way in rail; but we'll accept following in others footsteps.

For CO2 reduction, rail is key. For decades rail has been under-valued. To ensure benefits of rail can be fully utilized when the need for drastically lower energy consumption is reflected in our government's policies, existing rail tracks and rail right-of-ways need protection. Existing trucks-on-rails technology, such as RoadRailer and Expressway, must be maintained and improved.

Reprioritization recognizing the importance of rail and its inclusion as part of the overall transportation solution is imperative to realize a truly comprehensive, multi-modal transportation system.

Adjust cost / benefit analysis to reflect the public subsidies of roads versus the costs the rail industry incurs.

- ❑ See Appendix D - Rail Fact Sheet

Create a New Category in the Study Process: Necessities of Life

- ❑ We recommend the creation of a new priority category in the process called Necessities of Life. This category would include life sustaining systems / elements such as agricultural land and ecosystems. The magnitude of Climate Change and subsequent threat to life on earth would also be part of this category.
- ❑ Accounting for the value of life sustaining systems as well as the huge costs of Climate Change would be part of the cost / benefit analysis of this, and any other infrastructure protect. This approach is also known as “ecosystem based planning and management” and increasingly is becoming the baseline for natural resource protection around the world. The preservation of life sustaining terrestrial and aquatic ecosystems is the fundamental consideration when evaluating a development alternative. Destroying or degrading the ecosystem, such as the watersheds on the Niagara Escarpment, is not acceptable, regardless of the perceived short-term economic gain. Further, when the true economic value of our rural ecosystems and watersheds are considered, as noted in our Natural Capital Study, they would be protected indefinitely for future generations.
- ❑ It would also be appropriate to incorporate a level of accountability for decisions makers given the high level of impact such decisions have on society as a whole. For governments to continue to ignore this issue has become irresponsible. We are already witnessing increasingly erratic weather patterns here and around the world due to Climate Change. As recently confirmed by the UN weather agency, the earth’s climate is heating up and this in turn affects our ability to grow food. For example, the heat wave in Russia last year devastated the wheat crops. As we deplete the ability to grow food at home, we increase our reliance on other countries, like Russia, that may not be able to grow food for themselves let alone export to other countries.

The importance and value of life-sustaining functions have not been included in the NGTA study in any capacity and must be included in the future with overriding, priority.

Energy, Economics and Environment

- ❑ The terms of reference exclude major factors that are part of today's reality in the economic assessment of the NGTA project. Any future calculations must include these realities such as the cost of Climate Change and impact of peak oil.
- ❑ For our government to re-align policy and transport planning approach with the new global reality would be both responsible and forward thinking. The rest of the world is reacting to the costly impacts of Climate Change. Canada's own Auditor General in her farewell address on May 25, 2011 used the opportunity to warn government to start counting the costs of Climate Change.
- ❑ Ontario needs the type of transportation that produces the lowest amounts of Green House Gas emissions, that has negligible impact on our natural areas, agricultural lands and the quality of our air and water. These considerations must take priority over convenience and "business as usual" approaches, including forecasting and planning.

Biased cost / benefit analysis are not acceptable. Energy, Economics and Environment must be considered in concert with priority realignment that reflects today's high-level issues and the associated costs.

Conclusion

We recognize that the scope of some of our comments fall within and outside the authority of the NGTA Project Team for implementation (via the EA Terms of Reference). As such, we are submitting them to all our political leaders as well; to clearly indicate the direction we expect our government to take to achieve responsible and sustainable transport planning. A comprehensive approach is required that protects our life sustaining ecosystems, respects society's values, and supports a healthy economy. To date, the results of this EA are too heavily focused on the perceived economic benefits of building more highways, while ignoring the true environmental costs to society and more sustainable alternatives, such as transit and rail.

To demonstrate our commitment to this endeavour, the SEHC has commissioned the Natural Capital Study, at our own expense, to demonstrate to the MTO and our political leaders the extent to which utterly important factors have been ignored. We also consider this study as a step forward, and present it to you to assist in re-aligning the decision making process.

We aim to correct the priorities and policies that are influencing our current transportation planning and to have the cost / benefit equation include the value of life-sustaining functions and the immense costs associated with Climate Change.

We intend to seize opportunities to further influence the process at all levels of government in a positive manner and would applaud government actions and decisions that support sustainable transport planning and recognize the new world reality.

We are working towards incorporating an element of accountability at the decision making level of both government organizations and political decision makers.

In closing, we call for the cessation of any plans to build a highway or inflict a new cut on the Niagara Escarpment.

Appendix A



The Stop Escarpment Highway Coalition (SEHC) is committed to ensuring there is no new highway cut through the Niagara Escarpment, a national treasure and UNESCO biosphere reserve.

Coalition Group Members working in Concert with Halton Regional and the City of Burlington

Citizens Opposed to Paving the Escarpment (COPE)	www.stophighway.com
Oakvillegreen Conservation Association	www.oakvillegreen.org
Lowville Area Residents Association (LARA)	www.welcometolowville.com
BurlingtonGreen	www.burlingtongreen.org
Coalition of the Niagara Escarpment (CONE)	www.niagaraescarpment.org
Protecting Escarpment Rural Land (PERL)	www.perlofburlington.org
Milton Green Citizens Group	www.Miltongreen.info
Environment Hamilton	www.environmenthamilton.org
Preservation of Agricultural Lands Society	www.pals@becon.org
Cedar Springs Community	
http://web.me.com/thomassimpson/CedarSpringsCommunity/Home.html	
Sidrabene Latvian Camp	www.sidrabene.org

The Coalition formed in February 2011 and has grown to 11 groups and 7000 members in a few months time.

Appendix B

Submission copied to:

The Honourable Dalton McGuinty, Premier
The Honourable Kathleen Wynne , Minister of Transportation
The Honourable John Wilkinson, Minister of the Environment
The Honourable Rick Bartolucci , Minister of Municipal Housing and Affairs
The Honourable Linda Jeffrey, Minister of Natural Resources
Mr. Ted McMeekin, MPP, Ancaster-Dundas-Flamborough-Aldershot
Mayor Rick Goldring, City of Burlington
Mr. Gary Carr, Halton Regional Chair
Councillor John Taylor, City of Burlington
Councillor Blaire Lancaster, City of Burlington
Mayor Bob Bratina, City of Hamilton
Councillor Judi Partridge, City of Hamilton
Councillor Robert Pasuta, City of Hamilton
Councillor Brian McHattie, City of Hamilton
Niagara Regional Chair
Mayor Brian McMullan, City of St. Catharines
Mayor Rob Burton, Town of Oakville
Mayor Gordon Krantz, Town of Milton
Mayor Rick Bonnette, Halton Hills
Mr. Don Scott, Chair, Niagara Escarpment Commission
Mr. John Vice, Chair, Conservation Halton
Leader of the Opposition, Timothy Hudak
Ms. Andrea Horwath, NDP
Mr. Mike Schreiner, Green Party

Appendix C

Air Quality Assessment
Niagara to GTA Corridor
Planning & EA Study Phase 1
August 4, 2011
Completed by RWDI Air Inc
Guelph, ON

RWDI appear to have limited analysis to short-term (1 hr and 24 hr) exposures of Criteria Air Contaminants (CACs). Any analysis of long-term (annual average) exposures, which for PM_{2.5} are critical for a health risk analysis, have not been provided.

Because of the focus on short-term exposure, they have not dealt with NO_x as a precursor pollutant to the generation of PM_{2.5}. Thus the true health risk of exposure to PM_{2.5} in the study area would be substantially underestimated, if the results of this study were used to estimate the impact of existing or proposed road transportation on human health based on acute exposure alone.

In addition, RWDI appears to rely on Ontario “criteria” to be protective of public health. There is good evidence to the contrary (e.g., the Canadian Medical Association 2008 study). They claim that adverse effects may only occur within an “area of influence” of a few hundred metres from a roadway based on the Ontario “criteria”.

In fact, based on annual average values, and health risks as defined in the CMA 2008 study, the true “area of influence” is likely to be much larger. As a consequence, the estimated community health risks would be much greater than those based on acute exposure alone.

Dr. David Pengelly
Associate Clinical Professor, Respiriology
McMaster University, Hamilton ON

Appendix D

RAILWAY FACT SHEET

- Trucks contribute 12 times more in GHG emissions than railways. [1]
- Trains are quieter than trucks. One double-stacked train carries the same cargo as 300 trucks. If electric trains replace diesel, the noise level drops further. [2]
- Canada is the only developed country that does not have rail service to its' major airports. Toronto is attempting to construct a rail link [diesel] in 2011.
- Railways pay property tax on their corridors while highways are paid for by the taxpayer.
- Railways pay the full cost of maintaining their own infrastructure while taxpayers pay for trucks infrastructure.
- Railways move a ton of freight 156 - 512 miles on a gallon of fuel while trucks move 68 - 133 miles on a gallon. [4]
- Costs due to accidents are 1/10 of that associated with automobiles. [4]
- Railways are "proactive" while highways are "reactive" in the planning process.
- Railways powered by electricity directly from the grid results in 50% lower fuel costs and 20% lower maintenance costs than diesel powered. [3]
- Two rail tracks carry the same number of people daily as 16 lanes of highway.[2]
- A high-speed rail network would reduce traffic congestion, travel time, air pollution, sprawl & cost 90% less than new highways. [5]
- A typical rail corridor is 100 feet wide while that of a super highway is 400 feet in width.
- Rail moves 90 million tons through Ontario annually which is equivalent to 5 million truckloads.
- A High Speed rail link between Windsor & Quebec City has been studied for more than a decade. That's longer than it took to fight two world wars & win them.

[1] Pembina Institute Report

[2] Peter Schwartzman, Trucks vs Trains - Who wins
www.thezephyr.com/environ/trucktrain.html

[3] Richard Gilbert, Pros & Cons of Transportation on the Grid, Feb 8, 2011

[4] "Trains Beating Trucks in Efficiency Race", Bloomberg News, March 7/2011

[5] Christopher Hayes, Chicago Wildernes - Roads The Great Divide.
[http://www.chicagowildernessreports.org/pdf/roads the great divide.pdf](http://www.chicagowildernessreports.org/pdf/roads%20the%20great%20divide.pdf)