



August 27, 2021

(Sent via email and online ERO comment submission)

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Dear Katerina Downard:

Re: ERO NOTICE #019-3839 – Greater Golden Horseshoe Transportation Plan Discussion Paper

Ecojustice, Environmental Defence, Simcoe County Greenbelt Coalition, Rescue Lake Simcoe Coalition and Save the Maskinonge submit the following comments on the Greater Golden Horseshoe Transportation Plan Discussion Paper.

Overall, the Greater Golden Horseshoe (**GGH**) Transportation Plan Discussion Paper (**Plan**) reflects an approach to transportation and future GGH growth that would see Ontario fail to protect farmland and natural heritage, tackle automobile dependency, and adequately reduce carbon emissions. Overwhelmingly, the focus is on the facilitating, rather than transitioning away from, truck transportation and single-occupant vehicle use.

While the Plan acknowledges that “we cannot simply build our way out of congestion” and that mode share shifts are imperative, the Plan fails to provide any comprehensive investment or vision to achieve shifts in mode share away from single-occupant vehicles. Other than a few investments in developments near transit stations, the emphasis is clearly on building highways to facilitate sprawl. The emphasis is not on building an integrated and sustainable transportation system focused on non-vehicle modes. There is virtually no funding for intercity bus services for example (a paltry \$4.4 million). And almost no other initiatives that would shift mode share are identified in the Plan.

The Plan fails to acknowledge how the built environment, particularly sprawl and overbuilt linear road infrastructure influences mode share in favor of single occupant vehicles and against sustainable transportation options.

The Plan also fails to address environmental health, pollution, habitat destruction and biodiversity loss from highway and transportation infrastructure, which has been increasingly streamlined and exempted from environmental assessment in Ontario.

Ontario's roads and highways remain a significant pollution source and a significant environmental justice and equity concern. Ontario continues to allow highly polluting trucks on Ontario's highways, particularly trucks from before 2006, which are significant contributions to local and regional levels of particulate matter, benzene, nitrogen oxides and other harmful pollutants. Sustainable transportation planning must address the significant pollution from concentrating vehicle traffic on roads and increasing single occupant vehicle mode share through the construction of highways and other car-centered infrastructure. There are insufficient protections for residents and workers who are often located directly next to these major pollution sources with serious health consequences.

Ontario's highways have significant land use implications and are major drivers of sprawl, with unmitigable impacts on Ontario's waterways and terrestrial habitat through significant chloride and nutrient pollution. They act as major ecological corridor barriers and cause significant wildlife mortality.

The Plan provides no vision for avoiding these significant environmental and health impacts. On the contrary, it depicts "planned and conceptual road infrastructure", including Highway 413, the Holland Marsh Expressway, and a new highway through northern Durham Region. Rather than moving Ontario past the futile and environmentally disastrous practice of building and extending controlled access highways for private automobiles, the emphasis is on streamlining the assessments for major transportation infrastructure projects.

The emphasis on avoiding environmental assessment fits in with the Plan's broader approach, which is to single out certain transportation projects without any evidence-based rationale for why those projects are cost-effective, sustainable or would contribute to the goals of the Plan compared to alternatives. The Plan claims to promote "targeted" highway expansion but does not provide any context for how those highway projects were selected or why they are priorities over other projects, such as transit investment or active transportation.

A good example of this is the Plan's total absence of any serious discussion of cycling and walking infrastructure. While the Plan claims to "support" mode share shift to low and zero carbon modes, it includes no goals and no plans to achieve them. There is no clear funding commitment, no planning, and there is not even a commitment to improving the Ministry of Transportation's track record regarding the major barriers its projects and infrastructure have created to mode share (such as the countless existing highway overpasses and underpasses with no bike lanes or sidewalks). The only mention of active transportation is that the Ministry will work with other jurisdictions to connect "existing and planned" cycling routes. There is no funding, investment, commitment or even interest in expanding cycling and walking infrastructure anywhere in the GGH, nor any mode share goals that the Ministry identifies that it would like to achieve.

Transportation-related greenhouse gas emissions substantially contribute to climate change and are a major and growing source of Ontario's emissions. The proposed Highway 413, Bradford Bypass, 404 extension and Garden City Skyway will significantly increase vehicle kilometres travelled through induced demand and will become major drivers of Ontario's already rapidly increasing and out of control transportation emissions. A responsible Plan would be focused on

eliminating single occupant vehicle use and reducing emissions from trucks. Instead, what is provided is a highway-centric plan that pays minor lipservice to shifting mode share and proposes exemptions and streamlining for goods movement inspections, which may increase pollution.

The Plan must be overhauled to thoroughly engage with environmental concerns at the outset and embed environmental principles and objectives throughout. We recommend that every section of the Plan should first discuss environmental concerns in relation to that section. For example, the 2051 vision should begin with a vision of how Ontario's future transportation systems will reduce automobile mode share, reduce pollution and protect habitats and use Ontario's future job and population growth to foster complete, compact, transit-oriented communities in existing Greater Golden Horseshoe neighbourhoods.

Environmental considerations must be comprehensive and cumulative

The Plan should consider all environmental factors through a cumulative lens. Evaluating transportation projects with a cumulative lens that accounts for direct and indirect impacts would more accurately capture the risk and consequences of these projects. It also would better capture the benefits of transit and shifting mode shares away from single occupant vehicles. For example, one of the Plan's stated goals is to enhance capacity and performance on congested roads. The first two actions it sets out to achieve this are to build more highways and to expand highway capacity. Extensive research shows that building more highways and expanding highway capacity actually leads to *more* congestion, cars, pollution, financial expense, and other costs.¹ When evaluating this through a cumulative environmental lens, the Ministry must consider both the immediate impacts (destroying habitat, mining for materials, associated pollution, etc.) and the less obvious long-term impacts (more cars on the road, more emissions, more pollution, needing to build even more roads in future, destroying more habitat, using more concrete and aggregate materials, etc.).

The emphasis of the Plan should not be on improving level of service for vehicles, but rather should be focused on improving level of service for active transportation and transit modes, and reducing single occupant vehicle trips through means such as demand management.

Transportation planning cannot be divorced from the land use planning process. Currently, Ontario plans for exorbitant, sprawling growth and then uses those growth projections to make dire predictions about level of service for vehicles. This in turn is used to justify increasing the number of linear kilometres of roads through major highway and road expansions. All this system is capable of doing is further deeply entrenching vehicle mode share at great expense to other mode shares, environmental health and the environment.

¹ Naess et al. (2012) Traffic forecasts ignoring induced demand. A shaky fundamental for cost benefit analysis. *Aalborg Universitet* Retrieved from <<https://vbn.aau.dk/en/publications/traffic-forecasts-ignoring-induced-demand-a-shaky-fundament-for-c/>>; Sisson (2020) "Expanding highways and building more roads actually makes traffic worse" Retrieved from <<https://archive.curbed.com/2020/3/6/21166655/highway-traffic-congestion-induced-demand>>; Mann (2014) "What's Up With That: Building Bigger Roads Actually Makes Traffic Worse" Retrieved from <<https://www.wired.com/2014/06/wuwt-traffic-induced-demand/>>; Litman (2021) Generated Traffic and Induced Travel *Victoria Transport Policy Institute* Retrieved from <<https://vtpi.org/gentraf.pdf>>;

The 2051 vision is not imaginative in generating innovative and bold solutions for Ontario's transportation challenges. The Plan is entrenching more of the same. The Plan is premised on widespread adoption of less carbon-intensive single occupant vehicle technology (i.e. electric vehicles). The Plan should not rely on electric vehicles as a fix-all for environmental issues. Electric vehicles have significant environmental impact and this entrenches energy inefficient single vehicle use which is expensive to service with infrastructure. The Plan should proactively focus on reducing overall vehicle mode share instead.

The Plan would benefit from addressing more than just transportation. The Plan should consider trends in the modern workforce, home and community living, healthcare accessibility, and more. For example, more people than ever before are working remotely from their homes using the internet. The Plan states as a starting assumption that levels of traffic will return to pre-COVID levels without any supporting evidence. It provides no vision for demand management to prevent this outcome. The Plan should incentivize people to work where they live, which reduces their transport needs while enhancing their home and community life.

The Plan should strive for the transformative change we need in the transportation sector to help mitigate (and adapt to) climate change. The Plan should strive for systemic change that values human and environmental well-being over level of service for trucks and single occupant vehicles.

Apply an equity lens in crafting the Plan

The Plan should have as an explicit goal creating an equitable and accessible transportation system. Ontario has an aging population that will need alternatives to single occupant vehicles, regardless of whether they are EVs or another technology. Many Ontarians cannot afford to travel only in a single occupant vehicle. The transportation system in its current form is a barrier to Indigenous, Black and other equity seeking communities in Canada. The Plan also fails to address transportation-related environmental problems, such as climate change and air pollution/noise from transportation infrastructure which tend to disproportionately harm disadvantaged groups.

As currently framed, the Plan has no vision for connecting communities in a cost-effective, energy efficient, equitable and sustainable future.

Recommendations:

Overhaul the plan and develop specific goals for:

1. Transportation equity – enhancing access to transportation for all communities in the GGH, particularly those without access to vehicles.
2. Environmental Health – reducing noise, air pollution, vibration and other impacts from transportation infrastructure, with specific reduction targets.
3. Protecting habitat – include specific goals for enhancing clean water, greenspace and wildlife habitat in the GGH.
4. Reducing congestion – include specific goals to get vehicles off the road and reduce overall vehicle kilometres travelled through demand management and avoiding induced demand.

5. Increasing alternative mode shares – develop specific targets for increasing cycling and walking and transit mode share, as well as improvements to level of service for those modes in the GGH and a plan to meet those goals through specific investments and planning.
6. Removing polluting vehicles from the road – develop specific pollution reduction targets for trucks and a clear enforcement and inspections plan to ensure it works.
7. Integrated transit systems – develop goals for interurban transit and increased transit mode share with a specific plan to achieve that mode share.
8. Eliminating greenhouse gas emissions – the Plan must state specific goals for reducing transportation related emissions in Ontario and state how it will meet those goals, it must also address goals for reducing/eliminating greenhouse gas emissions from construction of infrastructure using concrete and other emissions heavy materials.

The Plan must explain how and why it selects transportation investment priorities in a transparent manner and how the above goals inform those decisions, as well as explain how it uses an evidence-based approach to accomplishing the above goals, and how progress on the goals will be measured and reported on for the public.

Ontario does not need more of the same, more highways, more streamlining and less objectivity in its transportation system. The Plan takes Ontario backwards and we ask that you abandon it and start over.

Thank you for the opportunity to submit these recommendations, we look forward to ongoing discussion to improve the Greater Golden Horseshoe Transportation Plan.

Sincerely,



Andrew Luba
Articling Student

Cc: Hon. Minister Caroline Mulroney – Minister of Transportation
Margaret Prophet – Simcoe County Greenbelt Coalition
Claire Malcomson – Rescue Lake Simcoe Coalition
Debbie Gordon – Save the Maskinonge