

February 4, 2009

[info@metrolinx.com](mailto:info@metrolinx.com)

**RE: Union-Pearson Rail Link Environmental Assessment**

**Please address the following comments/questions and add them to the EA Public Record:**

1. Why does Metrolinx use terms like “latest” and “stringent” emission limits to describe US EPA TIER 3 emission limits? What is the basis for using these relative terms?
2. The EA documentation identifies the proposed diesel locomotives as modern and clean yet it identifies TIER 3 EPA limits as “latest” and “stringent”. The stated purpose of TIER 3 limits, according to the EPA, is for “near term standards” and are only meant to apply to “newly built locomotives”. By the time the Proposed project is completed in 2014, the US EPA will be requiring all locomotives to meet “long-term TIER 4 limits<sup>1</sup>”. Why would Metrolinx willingly adopt “near term standards” for long-term planning? The Public expects higher standards from a crown agency and would be upset if they were aware of this discrepancy.
3. Particulate Matter, specifically, PM 2.5, has been identified as a serious public health threat. Why is Metrolinx adopting emission limits that **do not** make use of any **current pollution control technologies**, such as particulate filters? These technologies are already mandatory for trucks, buses and cars, the type of vehicles that Metrolinx is trying to replace.
4. Why aren't other pollution control technologies such as ammonia injection to reduce NOx being utilized? The public is being led to believe that the “latest” and most “stringent” technologies are being utilized.
5. Did Metrolinx consider adopting California's or the European Union's stricter emission limits? If no, then why?
6. Why are electric trains not being considered as an alternative? They would mitigate local air pollution and noise concerns. The City of Toronto has passed a motion in support of electric trains and numerous residents have voiced concerns regarding diesel locomotives and their effect on the local environment. I request that electric trains be considered as part of the EA? If no, then why are they being excluded?
7. Will the EA include a full environmental life cycle analysis of the alternatives (including diesel and electric trains)? Including environmental parameters, CO2, NOx, SOx, Organic Matter (as CH4), Particulate Matter, Lead, Cadmium, Mercury, Dioxin? If no, then why?

8. Will the EA include a full life cycle cost analysis of the alternatives (including diesel and electric trains)? If not, then why? Will the volatility of diesel fuel prices be considered including the expected long-term rise in prices (\$50, \$100, \$200 per barrel)?
9. Toronto taxpayers are paying millions of dollars to reduce the City's air pollution and greenhouse gases with programs such as hybrid-buses and cars, electrified transit, organic waste green bins, recycling programs and home renovation credits. Why is Metrolinx proposing to use diesel technology when the public has asked for cleaner and greener technologies, especially from the Public Sector? Isn't Toronto supposed to be a leader in green technology?
10. On February 3<sup>rd</sup>, 2009 during a speech at the Economic club of Canada, Premier McGuinty stated that Ontario should become a leader in green technology. Many of the visitors at Pearson will be arriving from countries that have been using electric trains for decades. In France, the entire country is covered with high-speed electric trains. Did Metrolinx planners consider that an airport to downtown link using diesel trains might leave visitors with a negative impression of Ontario's environmental record and expertise in green technology? Shouldn't Ontario be a showcase for the world instead of a laggard?
11. Did the Metrolinx planners look at rail infrastructure in other major international Cities? If so, which Cities were considered? How many have diesel trains and how many have electric trains? If no, then why not?
12. Did Metrolinx consider the cost of using a private for profit airport link? In December 2008, Hamburg, Germany, completed their electric rail link. They will be charging \$3.65 USD. Why is Metrolinx not following the Province's stated objective for affordable reliable transit?
13. What is SNC Lavalin's involvement with this Project? Did they bid on this project? Which consultants were hired for the EA process? Will Metrolinx allow a 3<sup>rd</sup> party independent consultant to peer review Metrolinx's findings? If no, then why?
14. Why did Metrolinx planners use outdated aerial photos of the Queen West / Liberty Village Area? There are multiple condominium projects that are either in construction or in the planning process, which have not been identified on any of the EA document maps?
15. Why Isn't Metrolinx considering an more underground tunnels for trains in the densest residential areas (i.e. near schools, houses, condos)?
16. Will a full noise assessment be completed for the densest residential areas? Will this assessment account for Mid-rise residential buildings? What is considered an acceptable noise level (in dB)?

17. What noise mitigation factors will Metrolinx employ, if any? If no, then why? Will the noise level of the trains be greater than the existing urban background noise?
18. Will the noise generated by the trains be subject to Ontario's Environmental Protection laws? If no, then why? Which specific environmental laws will the project be subject to? Will a Certificate of Approval that includes air and noise modeling be completed? If no, then why?
19. Did Metrolinx account for the impact on the socio economic environment in the Queen West / Liberty Village areas? What measures will Metrolinx take to protect the existing environment, if any?
20. What are the projected emission rates for CO<sub>2</sub>, NO<sub>x</sub>, SO<sub>x</sub>, Organic Matter (as CH<sub>4</sub>), Particulate Matter, Lead, Cadmium, Mercury, Dioxin (in g/Rm<sup>3</sup>)? What are the annual emission loads (g/yr)?
21. What is the additional cost, if any, of using electric trains?
22. Please provide projected financial statements for the operation of the private rail link including Balance sheet, Earnings statement, and Cashflow Statements, if available? If no, then why hasn't a financial analysis been completed?
23. Will the locomotives use low-sulfur diesel, as have been mandated for diesel vehicles in Ontario? Will the diesel distillates be refined from crude oil extracted from the Oil Sands? If yes, then what is the additional greenhouse gas impact of diesel extracted from oil sands? What is the total greenhouse gas emission rate (g/km, g/person/km ? What is the fuel efficiency of the proposed locomotives (l/100 km)?
24. What is the total person capacity of each airport link train? Why aren't larger GO size trains being used? Are larger trains more fuel efficient per person? What is the fuel efficiency of a Go train? Wouldn't larger less frequent trains be more efficient in terms of greenhouse gases than smaller less more frequent trains? Did Metrolinx complete an analysis of an optimal train capacity and frequency? If no, then why not? If yes, then will it be released to the public?
25. What are the emissions of an airport link train compared to a hybrid car, hybrid bus, electric train (CO<sub>2</sub>, NO<sub>x</sub>, SO<sub>x</sub>, Organic Matter (as CH<sub>4</sub>), Particulate Matter, Lead, Cadmium, Mercury, Dioxin (in g/person/km)? At 25%, 50%, 75%, 100% capacity?
26. Will the contract with the private train operator be released to the public?
27. Why is a shortened/expedited EA process being used? Why haven't effected residents been notified of the EA by mail?

Thank you for taking the time to answer my questions and I look forward to your response.

Best Regards,

Jonathan Matchett

---

<sup>1</sup> United States Environmental Protection Agency (US EPA), Exhaust Emissions Standards, Accessed Feb 4, 2009; <http://www.epa.gov/otaq/regs/nonroad/420f08004.htm>