

February 6, 2007

Attention:

Hayley Berlin, Project Officer, Ministry of the Environment  
Laurel Broten, Minister of the Environment  
Donna Cansfield, Minister of Transportation  
David Caplan, Minister of Public Infrastructure Renewal

Dear Ms. Berlin and Ministers Broten, Cansfield and Caplan,

Saturday my good spouse spotted the notice for an EA for a transportation plan for the area northwest of the city of Toronto, as part of the growth plan for the Greater Golden Horseshoe, including the Georgetown GO line and the Kitchener/Waterloo – Guelph Via line. As both these rail systems are part of a new, more comprehensive EA, and the Georgetown Corridor EA for GO Transit, which Ms. Berlin is the project officer on, is not taking the new GGH EA into consideration, we believe it is counter-productive and time-wasting to be studying the same areas and systems twice. For example, if the new EA recommends additional passenger rail capacity on the Kitchener-Toronto Via route, which shares capacity with GO and the proposed ARL, does it make sense to proceed with a study including Weston when the results of another study, which will have a direct bearing on the speed and frequency of passenger rail through Weston, is unknown? We now have two separate and distinct passenger rail systems travelling to Toronto on the same route. The GGH EA could potentially recommend extending GO rail service to Kitchener to augment or replace Via service. The GGH EA could potentially recommend that GO serve the airport from the West, which flies in the face of the private operator's monopoly position. The GGH EA could recommend significantly increased rail traffic along that corridor which in turn will affect the Georgetown Corridor EA (for example, affecting the mitigation necessary in the city of Toronto), yet the GGH EA is not examining the city of Toronto.

In addition to this GGH EA now proceeding concurrently with the GO/ARL EA, there is an EA studying the potential for rapid transit along the 427 corridor. The GO/ARL EA proposes to study the same thing. The EA's are separate and distinct, one on behalf of GO, one on behalf of the MOT, yet both will be studying the same corridor for the same purpose. Is there any sense in the duplication? Is there anyone who will benefit besides the consultants?

Clearly the government wants to improve rapid transit availability and infrastructure in the GGH, and we applaud that initiative. But surely the left and right hands should be working in concert, not as separate entities studying separately the same corridors.

It is becoming apparent that the Government of Ontario is 'using' Environmental Assessments as kinds of public sounding boards for as yet unwritten nor designed transportation policies or projects. It is apparent from the purpose document that the study is only looking at 'alternatives' for moving goods and people using highways and other methods from Kitchener east to Toronto. There is no project to base the EA on, only the GGH growth plan document, which itself has no project or plan, just a generalized statement that we need better transportation, and we should give priority to rail. So it will be very difficult if not impossible to determine exactly what proposal drives this EA, when there is such a generalized statement of purpose, driven by such a generalized GGH growth plan, which only really sets some very vague priorities.

That is not what EA's were intended for. EA's were really to take a problem, which has one or more proposed project solutions, and through an interactive process come up with the best solution. There is no specific problem attached to this EA, just a generalized statement that we intend to study transportation in a huge swath of Western GGH.

If your government really wants public input into transportation issues, it should call for hearings and ask for opinions. An EA implies a project or a problem and solutions, and results in the government's permission to begin a project. If the government has projects in mind, it should come clean and transparently advise what they are, rather than such a generalized and vague approach. An EA is then appropriate to determine if the planned project is the appropriate solution to a defined problem.

We would therefore urge that the government take the proliferation of EA's studying the same subjects very seriously, with a view to reducing such proliferation, so that a unified and coherent vision and approach to transportation in the GGH is the outcome. Further we would urge the government to refrain from the use of EA's as a means of a policy or project generation.

We would appreciate meeting with you to discuss this further.

Please contact the undersigned to set up such a meeting.

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