

Monday August 31, 2009

The Honourable John Gerretsen
Minister of the Environment
Floor 12A, 135 St. Clair Avenue West
Toronto, Ontario M4V 1P5

Dear Minister Gerretsen:

Re: Objection to Metrolinx' Proposed Diesel Expansion of Georgetown South GO Service and Union-Pearson Rail Link

Brief Description of Proposed Project and Location

On November 28, 2008, the Metrolinx Board of Directors formally adopted *The Big Move: Transforming Transportation in the Greater Toronto and Hamilton Area*. *The Big Move* identified nine priority actions, called "Big Moves," one of which (Big Move #1) is to build "A fast and expanded regional rapid transit network [to] ...bring fast frequent, all-day, two-way express rail service and expanded regional rapid transit service to every region of the GTHA..." The second Big Move (Big Move #2) "has a goal to establish high-order transit connectivity to the Pearson Airport district from all directions, which includes a fast transit link from downtown Toronto to Pearson Airport."

The Georgetown South Service Expansion (GSSE) and Union Pearson Rail Link (UPRL) were conceived to address these two priorities by greatly expanding the track capacity through the Georgetown South Corridor and by adding a spur to connect the Georgetown line to Pearson International Airport. This project, as currently conceived, will see an eight-fold increase in rail traffic along the Georgetown corridor, increasing the number of trains to in excess of 400 per day, up from the current level of approximately 50 trains per day.

Contact Name and Address of Proponent

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Primary Contact: Rob Prichard, President and CEO

Secondary Contact: J. O'Mara, Executive Lead: Environment Policy and Planning

Introduction

The Weston Community Coalition is a grass-roots community organization formed in 2005 to provide a voice to public concerns about a private train project proposed in 2001 to connect Pearson Airport to Union Station. Those public concerns led to a commitment made by the Province of Ontario to conduct a full Environmental Assessment of the project, including studies of a comparison of the environmental effects of different routings of a rail connection from Union Station to Pearson Airport. That assessment stalled for over two years at the Ministry of the Environment (see Appendix A for a chronology of the project).

That 2001 project is now one component of a Metrolinx plan to expand all forms of passenger rail service along the same rail corridor and through the town of Weston. Metrolinx has opted to use the new Transit Project Assessment Process (TPAP) for these new projects. TPAP was created by the provincial government to provide speedy passage for 'Public Transit' projects, under the aegis of the Provincial Government's 'Transit Priority Statement'. This statement suggests that the environmental benefits of public transit outweigh the need for full Environmental Assessments.

"Effective and expanded public transit infrastructure will:

...

Reduce Ontario's greenhouse gas emissions, cut smog and provide cleaner air to breathe.

Support sustainable urban development that leads to stronger, healthier communities and a higher quality of life. "

We believe that the shortened environmental assessment and the 'Big Move' background documents, show that reducing greenhouse gas emissions, cutting smog and providing cleaner air are not part of this project. In addition, we question whether the communities along the corridor will be stronger, or healthier, or provided a higher quality of life.

We will divide our comments into two sections. First, an analysis of the TPAP itself, as conducted by Metrolinx. Second, an analysis of the project itself and whether this is the most efficient and effective use of scarce taxpayer resources, and whether the 'stronger, healthier communities' goal is being met.

Metrolinx's TPAP Critique

Overview

This is one of the first transit project to be assessed using the shortened TPAP. A TPAP last 6 months, but considerable time in pre-planning is meant to be done before it is started. A full EA evaluates options as it goes, so the time spent pre-planning is actually part of the EA.

The project calls for a four-fold to five-fold increase in rail capacity through urban Toronto, and an eight-fold to ten-fold increase in raw numbers of trains passing through these neighbourhoods. It will be the busiest diesel rail corridor on the planet, and it will be smack dab in the middle of Toronto.

Analysis is complicated by the inability of the proponent (Metrolinx) or the negotiating agency (Infrastructure Ontario) to provide any detail on the equipment nor infrastructure to be used by the private partner (SNC Lavalin) for one-third to one-half of the trains along the corridor. Further complicating this

project is the necessity for significant (hundreds of millions of dollars) work to grade-separate or close roadways connecting neighbourhoods, which are the subject of much public debate.

These issues were of sufficient concern to warrant the previous proponent (GO Transit) and the Provincial Government to commit to a much more detailed study (a full EA). The choice of a TPAP method by Metrolinx, therefore, not only breaks the government's commitment, but threatens to give short shrift to one of the most complex and costly transit projects undertaken in Ontario.

Public Consultation

The TPAP process itself suggests that considerable pre-planning and pre-consultation should take place prior to the beginning of the 120 day 'clock'. A significant amount of work had been done in the previous ill-fated GO transit EA, describing the Air Link and a relatively small increase in GO trains.

Unfortunately, the final project design, including the massive increases in infrastructure and numbers of trains, was only known to the public for two short months prior to the launch of the TPAP, and the only 'consultation' was a few poorly advertised open houses, and some very small meetings with some community groups. The project design was virtually unchanged from that point until today, despite serious concerns of most if not all of those in the communities who were consulted.

Once the TPAP itself was started, the public was getting misleading, false and obfuscating statements from Metrolinx, GO and Infrastructure Ontario representatives, both at the open houses and in response to direct questions.

Electrification

From January of this year, questions concerning the ability of Metrolinx to electrify the corridor, including the ARL, were dismissed. In a meeting with Metrolinx chair Rob MacIsaac, members of the Weston and Mount Dennis communities were told that to electrify the corridor would cost 'billions' of dollars. Subsequent reading of the 'Big Move' background documents, and studies done for GO as late as 2008 state two orders of magnitude lower (low hundreds of millions)¹. We checked other jurisdictions (California, Belgium) which were proceeding with electrification of rail corridors, and again found the actual expenses to be two orders of magnitude lower than Metrolinx's claims. Even as late as June, Brian Peltier, Metrolinx engineering advisor, advised us that electrification of the corridor would cost tens of billions of dollars.

We have no idea why these clearly fabricated and unsubstantiated estimates were given to the public. When we asked, in July, for copies of previously completed electrification studies, we were told by Mr. O'Mara that we would have to use a freedom of information request. Unfortunately for Mr. O'Mara he was overruled by President Prichard and the studies released.

These studies were for the electrification of the Lakeshore Corridor, but the orders of magnitude of costs would be similar. Also, the Lakeshore will have significantly fewer trains (136 vs 464) than the Georgetown Corridor. We note that the Premier had ordered the electrification of the Lakeshore Corridor in 2007 as part of Move Ontario 2020. We suspect that was done before any comparison of the relative numbers of trains was done between corridors.

¹ Metrolinx 'Big Move' technology backgrounder estimates the cost of infrastructure for electrification (not rolling stock) to be \$5 million per kilometre. There are 31 kilometres between Union Station and Brampton, the end of the 'Express Rail' service. Hence \$155 Million. GO Transit studies for the Lakeshore corridor undertaken in 2008 suggested a slightly higher total, nearing \$275 Million.

Metrolinx has also stated that FRA (US Federal Railroad Administration) safety standard compliant railcars do not exist in an electrified multiple-unit version. There are numerous examples of such, including bi-level cars, in use in the United States. Metrolinx is either ill-informed or deliberately misleading us.

As directed by Metrolinx, we also asked representatives of Infrastructure Ontario about the negotiations with the private partner, and whether those negotiations would demand electric trains. We were told only that a memorandum of understanding had been reached, that we could not be given the details, and that a final contract would not be signed until after the EA, sometime in the fall. So, neither Metrolinx, nor Infrastructure Ontario could or would answer reasonable questions about the project. The real proponent, SNC Lavalin was never present at any of the public consultations.

Number of Trains

The first set of open houses deliberately understated the number of trains to be travelling in the study corridor. The total was posted as 220 trains per day, including 140 for the Air Link. This was a preposterously low number, as in other postings in that same set of open houses, the number of GO trains to Brampton and Georgetown was listed as 136. When questioned about the discrepancy, Metrolinx representative Colleen Bell tried to tell us that the boards showed it as 'opening day' numbers of trains. It clearly did not. Metrolinx at the later open houses owned up to 464 trains per day, and agreed that the TPAP would assess that many trains. It does not include provision for VIAfast, which could increase the number of trains by another 40. The final numbers of 'project' trains (not including freight) used in the EA are appended as appendix B, which is reprinted from the EPR's Air Quality Assessment. The current volume of trains is 19 GO Georgetown, 14 GO Milton, 12 GO Bradford and 4 VIA.

Weston GO Station

Various conversations by various members of the public with GO officials made the alarming discovery that the Weston GO station was at risk of closure. It had been stated in 2005 that the potential for a station at Eglinton would necessitate the closure of the Weston Station, as GO transit does not like to stop and start big diesel trains that often. When pressed, GO official Greg Ashbee made it very clear that if a stop were placed at Eglinton, the Lawrence (Weston) stop would likely close. This became a very contentious point, as the local MPP had made it a personal promise that a Weston stop for the Air Link was happening, and no mention of the potential closure of the Weston Station was on any of the open house documents. The local MPP asked the Minister of Transportation in the legislature, who confirmed that the stop would stay. However, when we asked for a 'Commitment' in the final EPR that the Weston stop would continue, Metrolinx refused. As previously stated, we have been made promises by previous ministers of Transportation which have been broken. A Commitment in an EA is binding on future ministers of transportation and governments, and that is what we needed.

Weston Tunnel

Metrolinx made public statements in January that the trains would be in a 'tunnel' through Weston. However, only when the open house documents are examined in detail is it clear that the 'tunnel' was merely a 300 metre lid on a trench. Most of Weston will not be in a 'tunnel'. It is misleading and erroneous.

John Street

Towards the end of the process, Metrolinx called on several community representatives in Weston to attend a 'design Charette' concerning John Street. It currently is the main east-west road connection from the business community to the residential community. Its loss will drive traffic onto other already crowded roadways, and remove a main source of business traffic for the central business district of Weston and for the Weston Farmers' Market. The city of Toronto has demanded that no roads be closed as a result of this project. Metrolinx had steadfastly refused to consider any option to keep the roadway open.

The design charrette was a lively, engaging half-day. The residents proposed 5 possible options, including trenching under Lawrence, a raised CP option, a curved slightly raised John Street, remaining open to vehicles, etc. However, the results as reported in the EPR bear little or no resemblance to the actual discussions and proposals. Two of the proposed solutions are not reported at all. The remainder are dismissed as too costly without any further study or justification. In some cases, additional property acquisitions are cited as the reason, when in fact none are required. It is baffling. The community preferred option (putting all the rails in a trench, bringing Lawrence back to its original grade, and keeping Denison Rd open over the trench, was dismissed as too costly, without any proof.

Clearly Metrolinx planned this 'charrette' as a sop to the community with no intention of taking it seriously. The 'conclusion' indicated in the final EPR was that the community had demanded the maintenance of road crossings and that Metrolinx had changed the plans to accommodate. In fact no changes were made to the number or type of road connections between the original project presentations in April of 2005, and the current EPR.

The Denison Rd structure proposed as Metrolinx's preferred option requires considerable expropriations of houses, which would not be necessary with an extended trench. An extended trench would also permit other pedestrian crossings, and permit a more friendly GO station in Weston. There are a number of places along the corridor where pedestrians cross, admittedly illegally, at more convenient points than the few roads that do now cross. Creating more pedestrian crossings is in keeping with Metrolinx's stated goal of getting more people out of cars and walking and biking, and increases the safety of the corridor and the strength of the community.

Metrolinx also claimed credit for the preservation of the 'Iconic Weston Farmers' Market'. Metrolinx did no such thing. The market will quite likely close as it is an outdoor unsheltered market and in such close proximity to diesel trains, climbing out of a trench every 2 to 3 minutes it will be impossible to carry on business. Metrolinx also plans to expropriate some of the parking lot used for the market.

Denison Rd. E. post- EPR consultation

Denison Rd E. community consultation took place in early August, after the publication of the EPR. Metrolinx had already chosen a preferred alternative, which included the closure of Sam Frustaglio Road and the construction of a curved, deep road tunnel under the tracks. It called this meeting purportedly to allow the community to choose between two options; closing Sam Frustaglio or keeping it open with several expropriations. However, as the meeting progressed, it became clear that the choice of closure was already made by Metrolinx, and the meeting was merely window dressing.

It also became clear that the community had no idea about the dangers of the proposed curved tunnel. This part of Weston is a high crime area, and members of the Community Police Liaison Committee have suggested that with no sightlines through the tunnel, it will become a haven for gangs and other undesirable elements. Metrolinx claimed to have consulted with Metro Police about this curved tunnel, but later investigation proved this to be a hasty phone call one day before this community meeting.

The community is outraged that this dangerous tunnel was not conveyed to them from the start, and that such a haven for gangs and crime would be foisted on them by a provincial agency, when a much safer and simpler option is available, trenching the trains.

This kind of shallow, insincere 'consultation' has dogged us from the beginning.

Changes to definitions in Regional Transportation Plan (the Big Move)

Over the course of many months, one of the 'benefits' touted by Metrolinx of the disruption caused by hundreds of additional trains would make on the community was the addition of transit to the communities it came through. The 'Big Move' Policy paper upon which it relied defined 'Regional Rail' and 'Express Rail' as having the same stop locations, 2 to 5 kilometres apart.

However, in the justification document appended to the EPR, Metrolinx has now advised the community and the rest of Toronto for the first time, that the new 'Express Rail' trains to Brampton, which are the main reason for the construction, will not stop anywhere but Bramalea, and will run non-stop to Union., bypassing Malton, Woodbine, Etobicoke, Weston, Eglinton, Bloor, and perhaps Liberty Village. This is a horrifying and completely unexpected change in plans from Metrolinx. The community has absolutely no idea of this change. It was never presented in any of the open houses, and was left to an appendix in the EPR to be discovered. It means that the community has been completely misled by the definition in the 'Big Move' Regional Transportation Plan being quietly changed to a new definition after the completion of the consultation. It is so treacherous a falsehood that, in our opinion, it renders the rest of the process suspicious at best, and deliberately lying to the public at worst.

Public Meetings

Large format public meetings were asked for repeatedly by the local councillor and MPP. Metrolinx steadfastly refused. It was clear to us that this was deliberately trying to limit the public ability to hear the same answers from Metrolinx and hear the questions being asked by others. There were many examples of differing responses given to community residents depending on who they asked in the open houses. For example, a GO representative stated categorically that expropriations would not be required for the project. At the same meeting the same evening, a representative of the consulting firm admitted that properties would need to be acquired, and expropriations would be necessary if landowners refused to sell.

Environmental Assessment Act Compliance

Socio-Economics

The TPAP requires the proponent to consider and report on all aspects of the definitions of the Environment in the Act. This includes 'socio-economic environment'. It is understood that this consideration is not a matter which can be used to overturn the assessment by the minister, but it is not meant to be avoided by the proponent. Despite repeated requests for help understanding how various elements of Weston would be protected following this project, and in particular the socio-economics of the main street, Metrolinx's only comment was to suggest that signage for detours would be placed during construction. There was no comment whatsoever on how to mitigate the harm to businesses of losing the connector road; no comment whatsoever on the community pleas to make the Weston station a 'hub' to connect to the 7 bus routes there; no comment whatsoever on how the Farmer's Market in Weston will continue to operate with the noise and disruption from trains every 3 minutes or less.

In addition, the former Town of Weston and Mount Dennis have been identified as priority neighbourhoods by the United Way and the city of Toronto, principally as a result of chronic poverty and the resultant crime. This riding (York South-Weston) which is bisected by the corridor is also identified as the second poorest riding in Ontario and poorest in Toronto. The Medical Officer of Health, correctly, suggested that providing this area with more pollution was hurting an already at risk area. He correctly surmised that health outcomes and neighbourhood health are linked to incomes, and this area is the poorest.

When the press asked Metrolinx representative James O'Mara for a comment, he questioned the bona fides of the MOH's assertions, rather than indicate what Metrolinx had planned for the socio-economic impact. It is this kind of attitude which has plagued this process throughout. Metrolinx claims there is no empirical

data to show that x numbers of people are sicker here and will get sicker because of y pollution from trains and therefore, can ignore the problem.

Public Safety

In addition to the concerns above about the dangerous tunnel at Denison Road, Metrolinx has refused to consider the risk of derailment as part of the assessment of human health and safety in this Environmental Assessment. They have been asked to do so by the Federal EA officials, but are refusing to provide any such risk analysis and mitigation strategies forward as part of this EA. The public is all too conscious of the dangers of high speed rail derailments as there were recent derailments in Toronto and Oshawa. The public deserves to know the risk and the mitigation strategies.

Heritage Properties

Metrolinx's consultant has only offered an opinion as to the potential harm to heritage properties during construction of the corridor. Their evaluation is completely silent on the potential harm from vibration and pollution on the properties themselves. An analysis of this is provided as Appendix D

Sound and Vibration Assessment

Metrolinx's consultant advised that actual sound readings were taken at various points along the corridor as a baseline. When we asked to see those readings we were told by Metrolinx that they did not exist.

Metrolinx's consultant advised that increases in average sound volumes measured over day and night periods are generally the determining factor in whether sound abatement techniques are required. Generally, an increase of more than 5 db suggests mitigation, and more than 10 db demands mitigation. Similarly with vibration, though absolute vibration levels are also taken into consideration.

In the instant case, Metrolinx did a very sneaky thing to reduce the impact of the eventual increases in sound and vibration. They have determined a 'future no-build' scenario as the baseline for increases in noise and vibration, rather than the present day as the comparator. Metrolinx has indicated that a significant number of new trains could use the corridor without additional trackage. Besides begging the question of why the hurry to build new infrastructure when a significant increase in capacity is available today, the use of a future imaginary sound level as a baseline is completely dishonest. The effect that will be felt by residents is not the difference between what might be and what is proposed, it is what is currently the case today and what is proposed. In addition, Metrolinx has deliberately avoided weekend comparisons of sound and vibration levels. Most residents are home trying to enjoy their properties during weekend daytime hours. To suggest that only weekday increases in sound averages will be the mitigation standard is to ignore the fact that far fewer trains run today on weekends. The difference will be much greater and more likely trigger the need for mitigation.

The software used is flawed in that it cannot account for multiple sources of sound passing the same point at the same time. There are many occasions when two, three or four trains will be passing a given point. The maximum sound level will be greater than that from merely adding the sound of one train to another, due to sound pressure wave reinforcing when the waves are in phase. The program is not equipped to handle this phenomenon, and therefore the projections are lower than actual.

In addition, Metrolinx has refused to consider the effects on apartment dwellers above the second floor of the many buildings along the corridor. They suggest, wrongly, that there are no balconies or openable windows above the second floor in these buildings. They also refuse to consider that mitigation might be necessary for such residents.

Air Quality Assessment

There are so many problems with this portion of the assessment it is difficult to know where to begin. Once again, Metrolinx tries to diminish the effect of the project by comparing it to a 'future no-build' scenario with a significant number of new trains. However, unlike with sound levels, Metrolinx is forced to deal with absolute total quantities of Contaminants of Concern.

Metrolinx did not do any testing of the air in the area of the corridor. Instead they averaged a number of air stations, only two of which were near the corridor, in order to determine an imaginary baseline for their project. They took only the 90th percentile as the average, which completely misses the worst days of the year and likely all the smog events. This is a serious defect in their analysis, and has the effect of seriously understating the baseline conditions.

Then, Metrolinx added the emissions from trains to the baseline, using assumptions of engine size and speeds which are, in our opinion, inaccurate. For example, for the CP freight trains Metrolinx uses an average of their entire fleet of engines, which includes switchers. We are reliably informed that the actual engines used on this line are considerably larger than the average. Again, actual measurements were not taken of the real world use of the trains. With the exception of the air-link, which is still a mystery, all the trains they are measuring are readily available to measure today.

In addition to the use of a 90th Percentile, Metrolinx only measured emissions in the portion of the corridor which is the subject of the study. However, Metrolinx used those emissions to quantify the total contribution to the airshed both in Toronto and in Ontario. Without using the total emissions from the trains, that figure will be low. For example, we were told at a meeting that we could not comment on whether the air-link trains would idle while stopped at Pearson or Union, as the study was only between 427 and Strachan. In addition, the 90 odd trains which will use the corridor south of Lansdowne from Bradford, and the 80 odd from Milton, have no emissions allocated until they enter the Georgetown corridor. These trains will travel many kilometres inside the city limits, and will emit significant quantities of CoC's but those will not be measured or projected as part of the analysis. Indeed the Bradford corridor north of Lansdowne nearly parallels the Georgetown corridor for a significant way, but the air quality projections do not include any emissions along the Bradford Corridor. Similarly, the section of the Milton corridor which was assessed did not include the new GO services entering the Georgetown corridor, and did not add in the contributions from those trains west of the Junction. The study is therefore not complete.

The end results of the study therefore understate the effects of the corridor. But even with an understated effect, the NOx contributions more than double, and exceed the provincial standards. Similarly, PM contributions are very close to exceeding the standard, and 1,3 Butadiene as well as Acrolein, exceeds it. Metrolinx's response to these exceedences is to suggest that their diesel trains are only part of the problem, and that much of the pollution existed before the project. This is unacceptable.

Not only does the proposal exceed provincial and federal limits on several counts, it adds significantly to the level of contaminants of concern inside a city limits, where smog is already a problem. The province should be working to reduce the overall quantity of pollution, not increase it.

The much ballyhooed Air-Rail-Link's 1.2 Million Cars off the road per year figure is extremely misleading. There are 140, 2 railcar trips per day, or 280 railcar trips per day, times 365 days per year, or 102,200 air-link railcar trips per year. That means an average of just under 12 passengers per railcar or 23.5 passengers per trip. By our calculations (see Appendix C), each railcar will contribute the same NOx and PM as over 300 automobiles travelling the same distance. Thus the Air-Rail link will pollute more than 16 times as much as cars. Metrolinx has refused to break out the pollution per type of train. GO trains are somewhat better, as

they can seat up to 1900 people. But they are only better when full or nearly so. Metrolinx plans to run 10 or 12 car diesel trains all day, 2 to 4 times per hour. Most of those trains will be nearly empty, and so polluting.

With respect to Greenhouse Gases, Metrolinx's own backgrounder² to the Big Move admits that Greenhouse Gases will not significantly decrease by virtue of the Big Move, and that the province should look to other methods to attack the Greenhouse Gas problem. "While it is estimated that the RTP would result in little or no increase in total GHG emission levels from 2006 levels (or possibly a small reduction) this would not be sufficient to meet the Province of Ontario's GHG reduction targets by 2020. "The EPR suggests a net reduction of Greenhouse Gases if the trains are full (1900 passengers, all of whom would have driven single occupancy vehicles). GO transit in 2007 had approximately 45,000,000 passengers over 51,000 trips in and out of Union station, for an average of 850 passengers per train, most not travelling the entire distance. As most of the passengers would have been on rush-hour trips, the non-rush-hour trips, and the necessary return trips during rush hour would be on nearly empty trains.

Mitigation and Future Commitments

So far as we can determine, the only commitment in the entire EA is to notify the public about future construction schedules. There are no other firm undertakings regarding mitigation, monitoring, construction techniques, road closures, or the future of stations, etc. We are aware of the 'bait and switch' EA process carried out in Vancouver for the Canada Line, where a bored tunnel was promised but cut and cover construction used. The resultant lawsuits are only just beginning, and the first \$600,000 award to a business owner for nuisance has now been paid out. We cannot understand why Metrolinx refuses to make firm commitments to mitigation and to its other promises made during the consultation, unless it is to foist a similar 'bait and switch' on the residents of Toronto.

The mitigation options, such as for sound barriers, are only recommendations, and Metrolinx seems to state that they will be subject to technical and economic feasibility. The West Toronto Diamond project currently underway suggested in its EA that GO would keep the noise from pile driving under municipal guidelines. GO then later decided that to do so was too expensive, and so ignored that promise, and the residents have had to withstand bone-rattling vibration and ear-splitting noise for 6 months now. If the sound of the pile drivers is any indication, 'economic feasibility' means we cannot count on 'recommendations' in the EA, and must demand firm commitments on each and every recommendation.

The only mitigation we can find with respect to air quality is to suggest that during the 'detail design' phase Metrolinx might work out a monitoring strategy with the MOE, which might warn people if air quality gets too bad. Medium and Long Term strategies seem to be to hope better engines are purchased, and to hope regional air gets better. This is, again, unacceptable. During the open houses, Metrolinx's consultants advised us that the NOx exceedences, for example, would have to result in fewer trains running. That is not what mitigation is being proposed.

There are many schools and daycare facilities near this corridor, and Metrolinx has made no commitment to allowing those facilities to operate undisturbed by the noise of construction. There is only a vague suggestion that they would try to limit construction to the summer months. This is unacceptable. Children should not be harmed by this project.

In addition large portions of the actual project have been left to something called a 'detailed design' phase. So, for example whether blasting will be the extraction method of choice for the bedrock in Weston won't be known until that phase. The EA will be over, and no consultation will be necessary, and no commitments

² http://www.metrolinx.com/Docs/big_move/RTP_Backgrounder_Modelling.pdf Page 14.

made. Normal EA processes are not complete until all design elements are known. This EA should be no different. The suggestion that considerable pre-planning be done before the commencement is intended to avoid this problem. If Metrolinx failed to do enough pre-planning before commencement to advise the public on the whole scope of the environmental impact, and to consult and make commitments on that scope, it should not fall to the public to absorb that error on their part.

Notification Compliance

There were serious deficiencies in the notifications to the public concerning the project. Metrolinx was advised, in person to James O'Mara, that some residents received notifications after the open house was completed. He was asked to repeat the notification before the second set of open houses in order to ensure that those to who had not received a timely notice of the first set of open houses would be given an opportunity to attend. He refused.

We pointed out that the use of the community newspaper as a means of contacting potentially interested parties was woefully inadequate, as it does not reach apartment dwellers who make up nearly 50% of the residents of Weston. Metrolinx refused to do more. Many residents did not receive any notice. A church which abuts the tracks and whose congregation will be seriously impacted by the Denison Road tunnel and stub road formation, was never notified, nor were many, many others.

Potential Conflict of Interest

It is our understanding that Mr. O'Mara has been seconded by the Ministry of Environment to act as project lead on this project. However, as the MOE staff who will be performing due diligence on this EPR may ultimately report to Mr. O'Mara when he returns to his MOE role as a director, it may be very difficult for them to be completely objective in their critique of the EPR. If he is to return to the Ministry, it must be on the clear understanding that none of the staff who review his work for Metrolinx can be in a position subservient to him in the future.

Project Critique

The remainder of this missive is to alert you and your cabinet colleagues to problems we see with the overall design of the project.

Project Need and Speed

Metrolinx has said much about the need to expand the Georgetown corridor to expand services. It is odd therefore that Metrolinx itself would put forward an EA which freely admits that a significant increase in capacity could be launched today without building a thing. The consultants were given a 'future no-build' scenario to work from to establish a baseline for sound, vibration and pollution. However that scenario shows a significant increase in train volumes. GO currently runs 19 trains per day, Via 4, from Georgetown/Brampton. The 'future no-build' shows 42 GO trains and 12 Via Trains, running throughout the day, from there. Currently there are 8 GO trains from Bradford, and without building new tracks, that could be doubled to 16.

In addition, if more capacity is required, GO could immediately add 20% to all trains, including rush hour trains, by running 12 car consists. Some platforms only accommodate 10 cars, but 2 end cars from either end could open only at alternate platforms. That is how most Via trains now run, and how the Georgetown train runs to accommodate construction at the Malton Station (only some doors open there).

Thus there are easy ways to increase capacity without building. Why this has not been done before is a question the province (and the patrons of overcrowded trains) should be asking Metrolinx. The conclusion

we must reach, though is that some other force is driving the need to build this project quickly and using diesel trains. We must assume, since so much pressure appears to be on the project, that the force is SNC Lavalin and the Air Link. No other answer makes sense, given the preponderance of this kind of information. Thus once again, we are subjected to speedy processes, less than ideal outcomes and large increases in pollution to suit a private operator.

Electrification

Metrolinx has admitted in the Lakeshore Express Rail Benefits Case Analysis, that diesel trains are not sustainable and electrification should be the rule. Yet for some unexplained reason, Metrolinx continues to fight against this obvious solution to many of the problems. It is not nearly as expensive as Metrolinx has claimed, and will in the long run more than pay for the initial cost, through greater flexibility, reduced maintenance, reduced energy cost, and reduced GHG offset costs. It has no local emissions, will encourage the creation and use of renewable energy projects to power it, and will contribute significantly less to the GHG problem the province will soon face. According to Metrolinx and GO's own commissioned studies, specifically the 2001 and 2008 Hatch Mott Macdonald studies of electrification, it can be completed within the time frames for this project.

The Georgetown corridor will have significantly higher train densities than any other, so it is an obvious choice for the first roll-out as the tracks are being installed. With 3 to 5 years of construction immediately upon us, it makes no sense to put this off to force the residents to endure 2-3 years more construction for an electrification project further down the road. Significant purchases of diesel-powered rolling stock will have to be made to proceed with this project as designed. Yet Metrolinx claims to want to electrify in less than 15 years, making some or all of the new rolling stock obsolete at that time. We are at a loss to understand the reluctance to proceed to electrify this corridor, including the Air-Link, now.

Project Flexibility

The project as designed relies on standard GO diesel powered rolling stock, with a single large engine pulling 10 to 12 bi-level coaches. As previously explained, GO's current passenger volumes, particularly in off-peak hours, do not warrant such a huge expenditure of energy and rolling stock. But shortening a train does very little to reduce the cost when it is a full-size engine. GO does not currently run anything less than a 10 car consist. If this were to be an electrified, multiple unit self-propelled vehicle system, GO could run as many or as few cars as it wanted and the demand needed. It would consume less energy, and be more flexible. Such vehicles could also be used into the airport as the airport link vehicles, and so integrate with the GO system.

The Air Link portion of the project, as envisaged, does not connect to points west of Pearson, limiting its flexibility still further. Patrons from Brampton west to London will have to find another method to get to Pearson, or go past the airport to Union and transfer back to the Air Link, paying another fare. Neither Via, nor the Brampton Express trains (according to the EPR) will stop before Union.

The project's flexibility is further compromised by the Air-Link's need for clear track space. It is our view that much of the infrastructure being built is being built to accommodate the private air link. Taxpayers' money is subsidizing the private partner.

Analysis by one of our members has shown that without the air link, Metrolinx's future demands could entirely be met with only 2 additional tracks. However, as Metrolinx's own analysis proves, the number of trains GO can run, even with 4 tracks is reduced by 40% in rush hour in order to accommodate the Air Link. Appendix A of the EPR shows 3 scenarios of train scheduling. In order to accommodate the air link, 2 fewer GO trains than desired can run in the morning rush hour. If, as we have suggested, the Air Link and GO

vehicles are interchangeable, and the airport run is merely an intermediate stop on the Brampton to Union line, all necessary trains can run, and it allows the patrons west of the airport to get into it without doubling back and paying another fare.

City Building

The city of Toronto has determined that no roads should close as a result of this project. Metrolinx is ignoring this demand, for at least two city roads. Much more elegant and environmentally friendly solutions are available to Metrolinx, but without comprehensively costing the option, Metrolinx has ruled it out as too costly (extending the Weston ditch south to accommodate all trains and keep Denison at grade). Metrolinx freely admits that options such as a covered market for Weston to avoid the every 3 minute train interruptions, installing a bike path along the corridor into Weston, connecting with TTC at a Weston Hub, etc. are desirable alternatives, but has decided that they are outside the scope of what Metrolinx wants to do. In other words, they will install their project, their way, without regard for the obvious and elegant better solutions. It all comes down to cost, but what price can one put on neighbourhoods? The Transit Priority Statement asserts that stronger healthier communities are part of the reason for doing these projects. But if weaker, sicker communities are the result of penny pinching, we are not better off.

Many communities along the corridor have suggested that a stop in their neighbourhood would go a long way to alleviate the disruptions caused by the train frequency. Electric trains could stop in more places without a loss of travel time for long distance patrons. The city of Toronto's official plan, approved by the Province, calls for a GO stop in Liberty Village and at Woodbine. Only Woodbine may be built. There are other communities where a stop makes sense – Mount Dennis, to connect to the Eglinton LRT, Carleton Village, to connect to the St. Clair LRT, The Junction, to connect to the future midtown line, and Brockton Village. Metrolinx has rejected all these stops except perhaps Eglinton. And a stop at Woodbine would seem to be to service a Casino. Is that a reasonable use of our tax dollars?

In addition, Metrolinx refuses to consider a hub in Weston, suggesting only a possible hub at Eglinton. Metrolinx's definition of a hub is met in Weston (residents within walking distance, etc.) while it is not met at Eglinton. As with the redefinition of 'Express Rail' we cannot fathom why a station with 7 buses³ is not being planned out as part of this project as a mobility hub.

Finally Metrolinx's mantra has been, in part, to do cost-benefit analyses of all their projects. This one, particularly the Air Link, has not had such an analysis. Metrolinx tells us they are being forced to do this project as a 'legacy' project, implying that they would rather not do this but must do so to satisfy their masters (the province). We would suggest rather strongly that the hidden cost of the air-link project as part of this project will never be picked up by the private sector partner, and the benefit to the city and the province of a train carrying 12 passengers per car, while polluting the equivalent of 300 or more autos, is not evident. The private sector partner will be free to set fares at whatever they want, much like 407 highway. In 2002 it was suggested that this premium service would be \$20 per trip. It will be much higher now. Why should the public subsidize through overbuilt infrastructure, a private sector operator, whose design will deliberately exclude most City of Toronto potential patrons? Why would the province choose to run a second rate service (compared to the service just launched in Vancouver) which will carry relatively few people and disrupt the lives of many along the route? The Air Link service should be part of the GO services, at a fare appropriate to GO. It would then attract far more patrons than the 12 per car planned, and take far more cars off the road.

³ TTC runs the 89, 32C, 58 A and B, 59 A, B, C and X, 52, 73 and 79 all within the vicinity of the Weston GO station.

Conclusion

The environmental assessment completed by Metrolinx is flawed, incomplete, and not in compliance with the law. The public consultation was primarily lip service, with little or no true ‘consultation’ where ideas and concerns were studied and alternatives sought. Even with flawed data, the project proposes to increase smog producing contaminants by a significant amount, including doubling oxides of Nitrogen and Particulates, to the point of exceeding provincial standards. You, Minister must find that the project raises health and environmental concerns significant enough to reject this shortened assessment and do a proper one. You should also demand that the project, including the Air Link, be electrified from the outset.

In addition, the project which is apparently primarily to provide infrastructure for an Air Link, has serious design flaws which the provincial government should take an interest in, as there is significant public money at stake, and mistakes will last 100 years or more.

Finally the province should be careful that a form of ‘environmental racism’ isn’t taking place, whereby already at risk citizens, primarily recent immigrants in poorer neighbourhoods are exposed to more pollution and more disruption and weakening of their neighbourhoods so that citizens from more affluent areas can have quicker trips into the big city.

Should you have any questions about the foregoing, please contact the undersigned at

416-240-7836
72 Church Street,
Weston, On M9N 1N3

Mike Sullivan,
Chair
Weston Community Coalition
On behalf of the Coalition

Carlo and Veronica Ammendolia	Mauricio Arenas
Mary Louise Ashbourne	Jason and Dawn Bolkan
Cathy Brown	Bob Smith
Cherri Hurst	Doug King
Ciro Polsinelli	Fred Hopper
Jason and Dawn Bolkan	Joan Simalchik
John Disanto	Judith Leach
Judy Duncan	Kevin Milburn
Laura Alderson	Leya Matalas
Domenic Martino	Neil Saito
Peter Muchler	Rick Ciccarelli
Robin Breon	Mike and Suri Weinberg-Linsky
Susan Lawrence	Terry England
Todd Southern	Vesna and Aldo DiClemente
Martin Proctor	Ann Turjansky
Galina Semikmenko	Jim Priel
Al Pietersma	Barb Spryropoulos
Paul Lawrie	Mount Dennis Community Association

Appendix A

Chronology of Project

1996 – Premier Harris cancels Eglinton subway – was eventually to go to airport.

1998 – Minister of Transport David Collenette asks for study of transit options to airport (IBI study) to force GTAA to protect land for transit.

1998 – City of Toronto asks Federal Government for help building a subway to the airport along the Georgetown corridor

1999 – Collenette tells IBI to add a Heathrow-like Express train to its study.

2000- Study says it's feasible, but other options need study.

2000- Collenette 'announces' study result as determining that express train is only option.

2000 – Collenette asks KPMG to study whether private sector could finance and build and run – KPMG says yes, estimates cost at \$315 Million, and says they should charge no more than \$14 per ride and they will make money in a year.

2002 – Collenette launches RFEOI – 4 consortia are prequalified and are interested.

2003 – Collenette launches RFBC – but quietly hides the bulk of the cost into GO Transit's improvements. Bidders will only be on the hook for about 1/3 of the cost. Now only one consortia is interested (SNC LAVALIN).

2003- SNC Lavalin is 'chosen' by selection group. .

2004 – Province announces matching funding for GO improvements, commits city of Toronto to another huge chunk of the cost (1/3 of most of the costs).

2004 – GO Transit launches Class EA – SNC Lavalin is EA consultant for GO

2005 – SNC refuses to consider stopping anywhere else along the line to serve Toronto, except Woodbine Racetrack. Public pressure (3000 people at an EA meeting) causes GO to move EA to a full EA, and SNC Lavalin drops out as consultant.

2006 – GO Transit EA starts –terms of reference sent to Minister of Environment in October, 2006.

2007 – No action by MOE on terms of reference. Move Ontario 2020 plan announced. Provincial Minister of Transportation promises full EA will continue and that all options will be studied.

2008 – No action by MOE on terms of reference – TPAP regulation enacted.

2009 – Metrolinx takes over project and launches TPAP EA in April. Project now includes 464 trains per day.

Appendix B

Metrolinx future train volumes for passenger rail

Appendix B2: Passenger Train Volumes - Shifted 24 Hour Distributions

Data from MAR distributed over a 24 hour period. Projected volumes based on RTP data. Includes 10-car equivalent trains for both directions. Timed relative to arrival/departure from Union Station.

Data Year	Applicable Modelling Scenario	Corridor Segment (Approximate)	Carrier	Average Speed (mph)	0:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	DAILY TOTAL				
					0:59	1:59	2:59	3:59	4:59	5:59	6:59	7:59	8:59	9:59	10:59	11:59	12:59	13:59	14:59	15:59	16:59	17:59	18:59	19:59	20:59	21:59	22:59	23:59					
2013	2024No-build	HWY 427 - West Toronto Diamond (Georgetown GO)	UPRL	80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
			VA	80	0.5	0.25	0	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12		
			GO	80	2	1	0	0	0	0	0	1.5	3	3	2.5	2	2	2	2	2	2	2.5	2.5	2	2	2	2	2	2	2	2	42	
				Total		2.5	1.25	0	0	0	0	1.5	3.5	3.5	2.83	2.67	2.67	2.67	2.67	2.67	2.33	3	4	3.5	2.75	2.5	2.5	2.5	2.5	54			
				West Toronto Diamond - Lansdowne Ave. (Georgetown + Milton GO)	UPRL	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		VA	35		0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12			
		GO	35		2	1	0	0	0	0	0	2.5	5.5	5.5	3.5	2	2	2	2	2	2	3	5	4.5	3	2.5	2	2	2	2	2	56	
				Total		2.5	1.25	0	0	0	0	2.5	6	6	3.83	2.67	2.67	2.67	2.67	2.67	2.67	3.33	5.5	6	4.5	3.25	2.5	2.5	2.5	2.5	68		
				Lansdowne Ave. - Strachan Ave. (Georgetown + Milton + Barrie GO)	UPRL	35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		VA	35		0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12			
		GO	35		2.33	1.17	0	0	0	0	3	7	7	4.5	3	3	3	3	3	3	3	4	6.5	6	3.5	2.67	2.33	2.33	2.33	2.33	72		
				Total		2.83	1.42	0	0	0	3	7.5	7.5	4.83	3.67	3.67	3.67	3.67	3.67	3.67	4.33	7	7.5	7	3.42	2.83	2.83	2.83	2.83	84			
2021	2024Build	HWY 427 - Weston Rd. (Georgetown GO)	UPRL	35	6	3	0	0	0	0	4	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	140		
			VA	35	0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12		
			GO	35	4	2	0	0	0	0	5	12	10	5	4	4	4	4	4	4	6	10	9.5	5.5	4	4	4	4	4	4	4	109	
				Total		10.5	5.25	0	0	0	9	20.5	18.5	13.33	12.67	12.67	12.67	12.67	12.67	12.67	14.33	18.5	19	15	11.75	10.5	10.5	10.5	10.5	261			
				Weston Rd. - Toronto West Diamond (Georgetown + Bolton GO)	UPRL	45	6	3	0	0	0	4	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	140
		VA	45		0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12		
		GO	45		4	2	0	0	0	0	5.5	14.5	12.5	5.5	4	4	4	4	4	4	6.5	12	11.5	6.5	4.5	4	4	4	4	4	4	121	
				Total		10.5	5.25	0	0	0	9.5	23	21	13.83	12.67	12.67	12.67	12.67	12.67	12.67	14.83	20.5	21	16	12.25	10.5	10.5	10.5	10.5	273			
				Toronto West Diamond - Lansdowne Ave. (Georgetown + Bolton + Milton GO)	UPRL	60	6	3	0	0	0	4	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	140
		VA	70		0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12		
		GO	60		8	4	0	0	0	0	10.5	21.5	19.5	10	8	8	8	8	8	8	11	18	17.5	11	8.5	8	8	8	8	8	8	209	
				Total		14.5	7.25	0	0	0	12	30	28	18.33	16.67	16.67	16.67	16.67	16.67	16.67	19.33	26.5	27	20.5	14.5	14.5	14.5	14.5	14.5	361			
				Lansdowne Ave. - Strachan Ave. (Georgetown + Bolton + Milton + Barrie GO)	UPRL	50	6	3	0	0	0	4	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	140
		VA	80		0.5	0.25	0	0	0	0	0	0.5	0.5	0.33	0.67	0.67	0.67	0.67	0.67	0.67	0.33	0.5	1.5	1.5	1.5	0.75	0.5	0.5	0.5	0.5	12		
		GO	50		12	6	0	0	0	0	10.5	29.5	26	14	12	12	12	12	12	12	15	23.5	23.5	15.5	12.5	12	12	12	12	12	12	295	
				Total		18.5	9.25	0	0	0	14.5	37	34.5	22.33	20.67	20.67	20.67	20.67	20.67	20.67	23.33	32	33	25	20.25	18.5	18.5	18.5	18.5	447			

Appendix C

Air Link Vehicle Emissions

Here is an analysis, based on Metrolinx's EPR, of the actual pollution emissions from the Air-Link Vehicles.

Air Link Vehicles are Tier 3, which emit 5.5 grams per hp per hour of NOx and approximately 0.1 grams per hp per hour of PM 2.5. Air Link Vehicles are assumed to have 2000 hp total. This seems high, but it's the figure in the EPR.

Cars travelling at an average of 50 km/hr emit 0.389 grams per Vehicle Mile Travelled (VMT) of NOx, and 0.0248 grams per VMT of PM.

In the course of one trip through the study area (from hwy 427 to Strachan) Metrolinx assumes the ARL vehicles travel 4.6 miles at 35 mph, 3.4 miles at 45 mph, 1 mile at 60 mph and 4 miles at 50 mph. In total, they travel 13 miles and take a total of 18 minutes to travel through the study area.

By multiplying the number of hours they are in operation (0.3) times the horsepower, times the emission rates of NOx and PM per horsepower per hour, we get the following:

Air Link Trains – 3340 g NOx
57.1 g PM 2.5

Over the course of the 13 mile study area.

By multiplying the distance (13 miles) times the grams per VMT for cars, we get:

Car - 5.05 g NOx
0.1469 g PM 2.5

Metrolinx assumes one passenger per car. Therefore we divide the car figures into the Air Link figures to get the number of passengers each would have to carry to equate to the same pollution as cars (not better not worse).

Air Link Trains - 660 for equivalent NOx
 388 for equivalent PM 2.5

Air Link Trains will hold a maximum of 120 passengers. According to the Premier, and Metrolinx, the Air Link Trains will take 1.2 Million cars off the road per year. There will be 140 trips per day, 365 days per year. Thus each train will have 23.5 passengers. Thus they will pollute 660/23.5 or 28 TIMES as much NOx as equivalent numbers of cars, and 388/23.5 or over 16 TIMES as much PM as equivalent numbers of cars.

The above base figures are in the Metrolinx EPR, in the Air Quality Assessment Document. The calculations are by Mike Sullivan, of the Weston Community Coalition.

Appendix D – Heritage Comments

Comments on the
Existing Conditions and Impact Assessment Report
Transit Project Assessment Process:
Georgetown South Service Expansion and Union Station-Pearson Rail Link
By Unterman McPhail Associates

Overall the assessment report picks and chooses the pieces of history that suit its argument, most notably the “good” historical relationship Weston has had with the railway. It omits many heritage and social structures, streetscapes and community areas. It deems the adverse effects of eight times the pollution and noise and over 300 trains per day to be insignificant.

Unterman McPhail Associates might have taken one “windshield survey” but that doesn’t hold up to the countless ones that are taken all the time by people visiting or coming to live in the area. Without exception, everyone is amazed and impressed by Weston. The mature trees, inviting green spaces and heritage homes are neighbourhood gems not to be taken lightly. There are a multitude of cultural resources older than forty years within this area. Even within sixty metres of the railway tracks there are houses, trees, streetscapes, river stone walls, barns and landscapes that are up to a hundred years old.

The reason for concentrating on the grade separation structures and at grade crossings is not explained and so it is not understood. This completely ignores some magnificent built heritage. Rosemount Avenue, for example, has a great many houses that are more than 100 years old and have the train corridor right next to their back yards, and yet they are not mentioned. The Plank Road Building, a designated heritage structure sits **sixty** metres from the tracks. Since the report says, “within the study corridor is the former historical settlement of Weston” why has the whole of Weston not been included?

The effects of this project, namely the pollution and the noise will not be constrained within the area of the tracks, so why would the study be limited to there?

The Weston Heritage Conservation District, Phase 1 has houses and streetscapes within **150** metres of the corridor. This area has built heritage as old as the middle 19th century. The Weston Heritage Conservation District, Phase 2, which is at the study stage, includes buildings that have the train corridor within thirty metres.

Weston Historical Notes

There are some historical facts slightly wrong in the report.

Benjamin Davis was granted land on lot 6 and 7, Concession 5 (not 8). He in turn gave lot 6 to his “ward” John D. Porter and bequeathed lot 7 to his wife. John Porter began selling pieces of his land as early as 1822, contradicting the idea that Weston initially only existed on the west side of the Humber River. A preliminary plan of lot 6 was done but it was never registered.

After obtaining lot 7 John Porter sold it to Woodberry Card. He proceeded to get Plan 5 done in 1846. This was the first registered plan of Weston.

Not all of the settlers moved to the west side. Most notably the Wadsworths, who had come to Weston in 1828, stayed in their mill complex, situated on what is now the Weston Golf and Country Club. This prominent family was responsible for bringing over a number of tree species that still exist in the corridor today.

Weston Road in the vicinity of Weston was originally the Toronto Carrying Place Trail. This was an aboriginal trading trail used in place of the rapids ridden Humber River to transport goods from Lake Ontario to the Oak Ridges Moraine. It dates back to the beginning of human habitation in the area.

Weston does maintain many fine residences and commercial buildings built during the last century. Very few of them have been mentioned in this report and that begs the question why? Just because houses are not designated or listed on the City of Toronto’s Inventory of Heritage Properties does not mean they are not worth being looked after. In their own words (Heritage Management Plan, Phase 1), Preservation Services have dropped the ball on many properties. Knowing this how can their list be the only guide? The beautiful structures in Weston that are very much older than forty years cannot be written off simply because they are not on a list that is neither up to date nor all inclusive due to time and financial constraints.

The last paragraph of page seven is confusing when it says “In many cases, listed (non-designated properties) are candidates for protection under section 29 of the OHA. Listing of non-designated properties does not offer any specific protection under the OHA.” Are these two sentences not contradicting each other?

The proposed South Georgetown Service Expansion and Union-Pearson Rail Link has the potential to adversely affect cultural heritage landscapes and built heritage resources, in the extreme, not only “generally”. While on a walk in the northern area of Weston, by the Humber River in the secluded alcove of Humberview Crescent, with members of Metrolinx and GO, one of the visitors commented on how quiet it was. Obviously this cultural aspect is going to disappear with 300 plus trains going by. Our library, which is a designated heritage building could suffer the effects of being isolated from a large section of the area due to noise and pollution created by the trains.

“...disruption effects...related to the increased proximity and frequency of trains on the residential, commercial and industrial lands adjacent the rail corridor” should not be considered only “additional”. These are the exact audible or atmospheric elements that are not in keeping with the heritage aspect of the area and should be considered as causes of direct impact, not indirect. The most obnoxious and detrimental effects of this project are being relegated to minor points. How are churches to continue to survive or schools able to teach when everything has to stop every three minutes when a train goes by? How will our heritage buildings and parks survive if they are bombarded by the increased nitrous oxide from the trains?

“The contextual changes are not considered to be provincially significant.” Why is that? Who says? What would these contextual changes that we are being told are so small actually be?

It is ridiculous to compare Weston’s historical association with the railroad with what will be barreling through the neighbourhood in the future. The freight trains that passed through many years ago stopped and loaded cattle, manufactured goods and other products from Weston, enabling the village to prosper and grow. They did not just whip by adding only noise and pollution. The large space in the track area of John

and King Street that is now going to be filled up with tracks, allowed the farmers to herd and hold the cattle for shipping, making even our open spaces historical.

The railway brought danger along with prosperity. There were enough crashes and casualties that an underpass was built on Lawrence Avenue and Weston Road. These might be examples to learn from. The problems were fixed without closing any streets permanently and without destroying the neighbourhood. The trains brought their own noise pollution also. After many complaints the Town Council finally applied to CN to stop blowing the whistle within the town limits.

The tracks physically divided the village, contributing to a feeling of isolation and segregation on both sides. In addition we know that plants that used to grow along the tracks, no longer do because the diesel fumes have killed them off.

It is also considered a reality that the railroad made the rich richer while the everyday worker had to live with the noise, soot and dangers that it brought. It would be best if history did not repeat itself with regards to this.

“The Humber River is recognized as a federally Dedicated Canadian Heritage River” so how can the report say there are no “federal recognized sites of significance”?

Mitigation

The principal impacts of the Georgetown South Service Expansion and Union-Pearson Rail Link Project are not indirect. Changing the whole feel, quality of life and substance of a neighbourhood is not insignificant.

How is it that a decision has been made to go with this idea but not all the information has been gathered? When would a “Detail Design” be done? Will it be available to the public? What would it say?

Items to be added to the Identified Cultural Heritage Landscapes and Built Heritage Resources

Photograph	Information
Designated on City of Toronto’s Inventory of Heritage Properties	
	<p>Historically designated Carnegie library. Built in 1914. Also has one of Weston’s ubiquitous river stone walls around it. 200 metres from the tracks Impact: Diesel particulates damaging brickwork and stained glass. Isolation due to noise and closing of street during construction.</p>
2 King Street	

 <p>64 King Street</p>	<p>Historically designated William Tyrrell home. Built in 1859. Tyrrell built and designed Weston's former Town Hall, the Weston Presbyterian Church and the Old Mill on the Humber. Father of Joseph Tyrrell, paleontologist. 100 metres from the tracks Impact: Diesel particulates damaging old brickwork and architectural details. Senior Citizen home that has sensitive receptors living there.</p>
 <p>2371 Weston Road</p>	<p>Historically designated Plank Road Building. A combined house and store, it was the office of the Weston Plank Road Company. 75 metres from the tracks Impact: Diesel particulates damaging old, fragile brickwork. Construction pile driving damaging fragile foundation, etc.</p>
<p>Borough of York Buildings of Architectural and/or Historical Importance Survey</p>	
 <p>125 Rosemount Avenue</p>	<p>Noted in Tom Cruickshank's book "Old Houses of Toronto". Built in 1894 it is a fine example of the Second Empire style. 100 metres from the tracks Impact: Diesel particulates damaging old brickwork and architectural details.</p>
 <p>89 Rosemount Avenue</p>	<p>Built in 1893, it was the home of Dr. William Charlton. Unique example of the Romanesque Revival style. 100 metres from the tracks Impact: Diesel particulates damaging old brickwork and architectural details.</p>

From: Bob Martindale [mailto:martplan@sympatico.ca]
Sent: August-26-09 4:12 PM

To: cherri@hurstclass.com

Subject: Existing Conditions and Impact Assessment Report - GSSE & Union-Pearson Rail Link

Cherri,

As requested, I've reviewed Richard Unterman's report and would offer the following observations:

(a) Comments on Process and Context:

1. The document provides a basic overview of the potential impacts of the project on the corridor in general and describes the identified heritage resources (i.e. individually designated properties and the Weston heritage district) within the study area but does not evaluate the actual environmental impacts on the described features. As I'm not totally familiar with the Transit EA process, I talked to Richard briefly in an attempt to clarify the procedures involved but he explained that such enquiries have to be put to Metrolinx in writing. I'm assuming that before a decision can be made by the Minister to approve the EA, individual Heritage Impact Assessments will have to be prepared for all of the listed and designated properties, heritage bridges and level crossings in the corridor. I'm not sure if Richard has been contracted to prepare these or not.
2. I reviewed Ontario Regulation no. 231/08, which sets out the parameters of the process and requirements of the proponent undertaking an environmental assessment for a transit project. The Regulation does not specify the actual area of impact to be examined (i.e. a minimum distance from the tracks, in this instance) but it does require the proponent to provide notice of commencement of the study to all owners within 30 m. The proponent has to consult with "persons ... who may be interested" in the proposal and "shall be conducted in the way the proponent considers appropriate". This unfortunately gives the proponent *carte blanche* to consult whoever they wish (subject to the list of agencies set out below in point 4) and in whatever manner they choose, rather than setting out minimum standards of consultation.
3. The Regulation also sets out the contents of the Environmental Report. Essentially, it must contain "a description of local environmental conditions at the site of the transit project" and the potential "impacts on the environment".
4. As part of the final Report, a "consultation record" has to be prepared, which is "a description of what the proponent did to respond to the concerns expressed by interested persons". In addition to individual concerned citizens, the proponent must consult with 7 or more specific agencies and/or organizations: the Ministry of Culture, Ontario Heritage Trust, Architectural Conservancy of Ontario, Parks Canada, Heritage Canada Foundation, the municipal heritage committee and local historical society(ies).

(b) Comments on the report itself:

1. The description of the project on page 2 outlines the changes in infrastructure involved in the undertaking, but fails to mention an equally important factor: the increase in number of trains using the corridor. I realize that the exact number is likely not known as schedules would not have been prepared at this point, but an approximate figure must be available. Obviously the volume of rail traffic and resultant emissions is as significant as the number of tracks in terms of environmental impact.
2. One factor that was not mentioned in the historical section of the report is the railway's conversion of steam power to diesel power that occurred in the late 50's, which would have substantially reduced the adverse environmental impact at the time.
3. Section 1.5 - Sensitivity to Change: I'm not sure if the language used here is typical of environmental assessments, but it strikes me as being very euphemistic. Adverse impacts are defined as either "displacement" (removal of a heritage resource) or "disruption" (indirect impact on the resource) by "the introduction of physical, visual, audible or atmospheric elements that are not in keeping with their character and/or setting." What is being described is, chiefly the effects of increased noise and emissions. The statement that "the disruption effects to identified cultural heritage resources related to indirect impacts ... will be limited to potential changes in context" seems to skirt around the real issues being raised by the community.

4. Similarly, the statement in section 1.6 (Mitigation) that "the principal impacts in the Georgetown South Service Expansion and Union-Pearson Rail Link Project are indirect" may be technically correct and in keeping with the language used in environmental assessments, but in my opinion does not properly address the objections to the project.

5. Table 1 purportedly (as explained in section 1.6) describes proposed mitigation measures for the project. I respectfully disagree. The table provides a good description of the identified cultural heritage landscapes and built heritage resources along the corridor, but fails to describe specific impacts in most cases - instead, it refers to about "general construction/operational effects related to the construction of additional tracks". As noted previously, rather than suggesting actual measures designed to mitigate these effects (such as fencing, berms, etc.) the table recommends that the design should be reviewed when more details are available to confirm that it has not changed or an individual Heritage Impact Assessment be prepared. Neither of these approaches mitigates or reduces the adverse environmental effects of the proposal. However, it appears that the specific impact on individual properties or structures is being deferred to a later stage in the process.

6. The section describing the impacts on Weston ignores the effects of the widened rail corridor and increased noise and emissions on the properties in the proposed heritage district on the east side of the tracks. Unfortunately, under the Provincial Policy Statement, heritage resources are not protected unless they are designated, either individually or as part of a conservation district. However, given the fact that the City did establish Phases 2 and 3 as part of the Weston HCD Study Area, I believe that the study should recognize the heritage resources in phase 2 and evaluate the impact of the project on these resources.

Overall comment:

I believe that the report does a good job of describing the existing heritage resources immediately adjacent to the rail corridor, but does not specifically point out the anticipated environmental impacts of the proposal - either on the identified resources or those just beyond the corridor (such as the homes on Roselawn Ave.) which will in my opinion be adversely affected by the increased noise and possibly emissions resultant from the project.

Thank you again for the opportunity of reviewing the report. I hope these comments are of assistance.

Respectfully submitted,

Bob

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