

Citizens Opposed to Paving the Escarpment

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Growth Plan for the Greater Golden Horseshoe
Ministry of Public Infrastructure Renewal
Smart Growth Secretariat
777 Bay Street, 16th Floor
Toronto, Ontario
M5G 2E5

Re: Growth Plan for the Greater Golden Horseshoe Discussion Paper

Dear Sir or Madam:

Having reviewed the Places to Grow Discussion Paper, Citizens Opposed to Paving the Escarpment (COPE), would like to take this opportunity to provide comments on the content and direction being proposed for growth planning in the Golden Horseshoe area. COPE is a grassroots group formed in opposition to the poorly thought-out Mid Peninsula Highway proposal. COPE is dedicated to:

- Preserving the Niagara Escarpment;
- Ensuring that no new highway corridors are paved across the Niagara Escarpment; and
- Ensuring that all viable alternatives to the proposed Mid Peninsula Highway are fully considered

These comments are preliminary.

Overview

In general, we support the guiding vision of a “Greater Golden Horseshoe that will be a great place to live in 2031.” We support the Ontario government’s intention to formulate a “strategy for building strong communities and improving the quality of life for the people of Ontario...” and to bring “real, positive change that will lay the foundation today for how we live tomorrow.”

We are pleased with the recognition that the Niagara Escarpment and the Oak Ridges Moraine need protection and we strongly support the emphasis on developing public transit as a priority in order to combat the ever-increasing problem of urban sprawl and

traffic gridlock. These problems are the result of poor planning in the past and reflect our society's habit of building new roads with little thought. We believe transit will negate or drastically reduce the need for new highways or economic corridors, as they appear to be renamed, in the Growth Plan discussion paper.

COPE believes that if Ontario continues on its current path, we will one day wake up to discover that our green-space and the Niagara Escarpment, as we've known it, is gone forever.

Disclaimer

It must be noted that the planned growth and recommendations, as outlined in this discussion paper are fuzzy, mercurial and require rigorous description to avoid future abuse. It appears that the Mid Peninsula Highway has been included in the plan but disguised as an "economic corridor." It is disturbing to note the highway's inclusion based on the biased and faulty work completed by the Ministry of Transportation in their work on this project thus far. Despite good intentions, there is no provincial priority among competing major land-use such as the growth areas or the Greenbelt. Therefore, this submission should not be construed as a blanket endorsement of the recommendations.

Where to Grow

- **The problems with existing maps need to be addressed.** There are areas indicated as urban which should be rural. Current agricultural land considered class 1 and 2 has not been included in the Hamilton area. These assumptions and exclusions do not bode well for future planning nor the supposed commitment to supporting strong rural communities. Furthermore, bad information from the onset will lead to poor results.
- The amount of land identified as urban over the next 30 years is excessive with unclear boundaries. **A clear planning rationale for projected urban land needs must be provided.**
- Rather than reacting to anticipated growth, the question of how much growth the area can sustain needs to be addressed. Uncontrolled growth can have a devastating environmental and economic impact on society. **The need for interaction with the Federal government on immigration policy and settlement location is clear.** The growth area could be expanded to include such places as Thunder Bay, North Bay and Sudbury, which could support considerable amounts of growth with the appropriate infrastructure investment.
- **The assumption that jobs created by future economic growth will be "good jobs" is uninformed and unsubstantiated.** Employment at a big box store or a fast food restaurant is not a good job. Furthermore, the emphasis on "economic

corridors” indicates that we will be relying more on importation of goods, which has historically meant the loss of good jobs to other geographical regions.

- The source of food, water, natural heritage systems, green space and natural resources needs to be thought of as more than an enhancement to the quality of life. These factors also need to be considered in the economic sense. In the past, economics have been narrowly defined in relation to development. Although not clearly stated, it appears that “demonstrated life cycle costing” will be a positive step in this direction. **The reality of our social and environmental situation indicates a need to expand this definition to include the full economic impact of our choices. COPE recommends that such things as the impact on health care costs due to increased air pollution, increased taxes required to pay for new infrastructure, ever increasing fuel prices and the cost of replacing ecosystems (services that nature provides free of charge) be included in any economic model.**
- **COPE supports intensified growth within existing urban boundaries IF growth is focused along EXISTING corridors.** The economic corridor from Niagara to Burlington **would cut a new swath** through environmentally sensitive and agricultural / rural land at a distance from existing development. It is designed to induce urban sprawl on virgin land. This is contrary to the concept of “compact development.”

Infrastructure to Support Growth

- The emphasis placed on “focusing highway investment to trade corridors” as specified on page #35, is disturbing. The indication that the building of highways has been predetermined is clear. Furthermore, the Niagara / Burlington economic trade corridor indicated on Map #6 IS the Mid Peninsula Highway option “C”. **For this ministry and the current provincial government to accept the shoddy work of the Ministry of Transportation on the Mid Peninsula Highway as valid and worthy of inclusion in this plan from commencement is disturbing.**
- One of the strategies to assist implementation is to “streamline the environmental assessment process, particularly for the transit initiatives”. This approach raises great concerns for several reasons. The approach circumvents completing a proper and full environmental assessment, which shows the same lack of respect to the environment demonstrated in the past. Also, the intent to “streamline” the environmental assessment process is NOT limited to the creation of public transit. We interpret this as an indicator that to do the same for highways exists. **COPE expects nothing less than a full and complete environmental assessment be completed for the economic corridor indicated on map 6. This includes completing a proper needs assessment AND considering ALL OPTIONS first.**

- On page 27, it states that the “environmental impact can be mitigated or minimized.” **There is no reference to prevention or avoidance. Now is the time to aim higher and aim to avoid adverse affects to the environment, not just “minimize them.”**
- Historically, the Ministry of Transportation has focused on roads as the only mode of transportation. This needs to be addressed. Their lack of vision is killing us. The Growth Plan states that we are in a “new era in community planning” which means breaking the old pattern of thinking. **The outdated thinking of the Ministry of Transportation must be addressed.**
- **COPE agrees strongly with the idea to support public transit for the region’s long-range infrastructure requirements and believes this commitment needs to be expanded to rail for transportation of goods as well.** A priority MUST be placed on public transit over other options and the concept of sustainability must be a factor when planning long-term. For example, rising gas prices will adversely impact vehicle usage. We need to build transportation alternatives now. Also, money invested in transit today will be minimal compared to the rising health care costs resulting from more highways over the Niagara Escarpment and other areas of the Greenbelt.
- We understand that a list exists of infrastructure and highway corridors, which would be allowed in the Greenbelt. This sounds suspiciously like pre-authorization for the building of highways such as the proposed Mid Peninsula Highway renamed as an “economic corridor” in this Growth Plan. This appears to be an attempt to circumvent the purported intent of the Greenbelt and the Growth Plan at the onset. **The priorities for growth planning and Greenbelt protection must be clear** for building more highways is contrary to providing for a healthy environment and populace.
- COPE understands that expansion of existing highways may be required after a clear need has been determined. However, **COPE is calling for NO NEW Highways on the Niagara Escarpment.** If transit and other transportation options are managed properly, new highways won’t be necessary. If municipalities developed communities that fostered living and working locally, commuter traffic would be markedly reduced.
- **Build more environmentally friendly transportation alternatives FIRST – before building more highways.** Consideration for return on long-term investment must be a factor – rather than choosing the cheapest method at the time. The impact of a highway is far-reaching and historically, has not been fully accounted for when considering expense.
- A demonstrated need for the MID PENINSULA HIGHWAY was never established. The project commenced based on the assumption that a highway would be built. **It is imperative that rigorous standards be set around**

determining need and infrastructure assessment to avoid the pushing of isolated agendas (such as the Mid Peninsula Highway / Economic Corridor) upon the rest of the region.

- **Any transportation planning in the Greater Golden Horseshoe area and Southern Ontario must be conducted within a global, comprehensive transportation plan, which places a priority on public transit and more environmentally friendly modes of transportation.**
- **To further protect environmentally sensitive areas in the Golden Horseshoe, those such as the Parkbelt West Lands should be permanently transferred to the authority of the Niagara Escarpment Commission or included under the protective umbrella of the Greenbelt Protection Act.**

Protecting What is Valuable

- **COPE recommends that the air we breathe be given a priority as a natural resource.** We view it as rather important. It is also an issue that has been glossed over in the Growth Plan. There have been an increasing number of reports describing the adverse effects poor air quality has on our health as well as the costs to medically treat those affected. Highways and the resulting particulate matter, especially from diesel, aggravate pulmonary diseases. This further demonstrates the need to banish future highways from the Golden Horseshoe.
- During the Mid Peninsula Highway public consultations, Dr. Pengally criticized the Ministry of Transportation for using air quality data in their Needs Assessment that was approximately 30 years out of date. **Current tests and data must be used and incorporated in any needs and environmental assessments conducted on future infrastructure planning to measure the environmental and economic impact.**
- Food, water and green space aren't enhancements to our society; they are fundamental to our existence and a life necessity and **must be recognized as a priority in future planning.**
- When making "critical decisions about land use" not only must action be taken to protect our land, we need to accept that our current policies and practices are unsustainable in conjunction with a healthy living environment. **It is imperative that any plan protects our green space with a permanency that will stave off those who view it as a source for future development and profit.**
- **COPE supports the Growth Plan's recognition that the environment and farmlands must be protected.** The building of highways is in conflict with this

goal. They sandwich land between corridors and expose them to developmental pressure. Runoff from highways is toxic and contaminates our water and the soil used to grow our food. Particulate matter from trucks is highly toxic and would not only impact the health of humans, but of the animal population as well.

- Farming as a profession is endangered. The Growth Plan must reflect respect for all farmers, not just those in specialty areas. **The map depicting farmland did not recognize much of the class one and two land in the Hamilton area. This needs to be corrected.** With the crumbling of the farming infrastructure due to haphazard development, our ability to feed ourselves as a society is reduced. Not only does this undermine our sovereignty, it increases reliance on food importations – inducing a need for transportation that did not originally exist.
- **COPE recommends that urban boundaries not be extended in any way until the growth plan is finalized.** Developers have raped the Golden Horseshoe at will up to this point. It is now time to return our communities to the people who reside in them.

Implementation: Moving Forward

- **COPE supports requiring all levels of government being held to standards related to supporting a Growth Plan.** Although various levels of government view themselves as autonomous, citizens pay their taxes out of one bank account and, for the most part, don't differentiate between levels of government.
- **Clarification of policy priorities** to guide regional and local planning in balancing competing uses is needed.
- **A strong policy framework must be provided** for staging growth areas based on updated and corrected maps.
- **Legislate the necessity to develop and build public transportation as a priority, in the shortest timeframe possible.** The use of rail to transport goods should also be legislated.
- It appears that the door has been left ajar to allow for development on environmentally significant lands. **To truly protect significant areas, enforcement is needed in addition to plans and policies.** This could mean bolstering the enforcement of existing legislation, including enforcement measures in any new legislation and ensuring that a governing body has the expertise and integrity as well as the authority to uphold the plan.
- Part of any successful plan is not only monitoring, but also taking corrective measures. **The room to enforce and take corrective measures is a necessary element of success and should be included in this plan.**

Next Steps

- The short timeframes allowed for planning the Mid Peninsula Highway were a big issue. Shabby workmanship was pushed through at breakneck speed. **The rules of engagement and implementation schedule for the Growth Plan must be sufficient and clearly identified.** This must include sufficient time for thoughtful consideration and maximum citizen involvement. There is a clear need to return to the fundamentals of planning. The Growth Plan is looking 30 years into the future. Let's consider our actions wisely from the onset.
- **COPE requests to participate in any future discussions, workshops or committees struck to further define transportation and infrastructure planning.**
- **COPE recommends that a broad based stakeholders group (including COPE) be created to oversee the Terms of Reference created for the economic corridor formerly known as the Mid Peninsula Highway.** Now is the time for people and government to honestly engage in a discussion of Terms of Reference and the project as a whole.
- **The province is in the process of developing a transportation strategy that will support improved public transit and identify critical investments. COPE requests to be part of this process as well.**

Questions We Would Like Answered

- In reference to the Mid Peninsula Highway / Economic Corridor, the Provincial government committed to completing a full environmental assessment. Briefly, we consider a full Environmental assessment to mean truly determining the need for a highway/corridor in a proper needs assessment, considering all options to meeting the actual need and considering the full environmental impact. **How does the current provincial government define a full environmental assessment?** There is a clear need to review and strengthen the environmental assessment process. It is necessary to avoid abuse that has taken place in the past as demonstrated by the use of scoped environmental assessments for extensive infrastructure projects.
- Is this government committed to completing a new, unbiased, Needs Assessment for any "economic corridor" considered under the Growth Plan?
- Although the name has been changed to an economic corridor, does this government remain committed to conducting a full environmental assessment for the corridor indicated on map 6?

- Is consideration being given to using alternate sections of the Environmental or any other Act in an attempt to circumvent a full environmental assessment for the Mid Peninsula Highway / economic corridor?
- What is the status on the original work completed to support building the Mid Peninsula Highway? Will this faulty and biased work be used for any purpose of the Growth Plan?
- What is the role of Minister Caplan's initiative under the Places to Grow Plan in comparison to the Ministry of Transportation? Are the ministries working in concert?

In Closing

Although we are pleased to see a commitment to a holistic approach to growth planning by the province, we are ready to oppose the building of the Mid Peninsula Highway, even under the guise of an economic corridor. We intend to hold the government to their commitment for a FULL ENVIRONMENTAL ASSESSMENT for the highway/corridor and to break away from the outdated way of thinking about transportation when planning for the future. We believe we must forge on in a new direction of planning for growth while respecting the environment and the voiceless treasures that sustain us. We hope that the foresight and will exists to protect the Niagara Escarpment and Greenbelt from the destruction that will result from more highways.

The Greenbelt Task Force stated that “the way we live tomorrow depends on how we plan today.” That is why we must reiterate the need to expand our thinking beyond the outdated highway mentality of the Ministry of Transportation. We must take sufficient time to plan for the future AND we must consider ALL factors including alternatives, pollution, and all costs prior to declaring that the plan is an economic success.

COPE looks forward to continued involvement and consultation on this important initiative. We wish to be part of a process that puts us on a path to a future in which the province boasts a first class public transit system, a world-class green infrastructure and a thriving economy.

Sincerely,

Susan McMaster and David Bailey
Co-Chairs
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