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TRANSPORT 2000 ONTARIO, INC.
Fighting For Environmentally, Socially & Economically Sustainable Transportation

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Toronto, ON M6C 3Y6
November 27, 2006

Ms. Hayley Berlin, Projects Officer
Ministry of the Environment
Environmental Assessment & Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5

Dear Ms. Berlin:

Re: Georgetown Pearson Study Terms of Reference (TOR)

Transport 2000 Ontario is an incorporated volunteer organization that promotes public transportation. We have members across the province, especially in its major urban centers. We support initiatives in the GTA to expand public transit in terms of service improvements and network expansion.

We believe strongly that GO Transit's commuter rail system should move quickly to provide all-day two-way service on an expanded network serving longer distance travel in the GTA. We also believe that frequent diesel rail rapid transit, using technologies that are compatible with GO, VIA and CN freight, should be instituted on the corridor between Union Station and Pearson Airport to reduce travel times, attract car drivers, and prompt new transit-oriented development on Toronto's west side.

In addition, linking the Pearson Airport to downtown Toronto makes possible access to the VIA Rail system for medium and long-distance inter-city train trips that can help reduce airport flight congestion, a strategy that has been successful in Europe and Japan. It should be noted that the very likely adoptions of carbon taxes and carbon credits as a means to reducing greenhouse gas emissions will be an incentive for airlines to focus on long-haul flights, requiring improvements to medium-distance rail services for regional connections to major airport hubs. Thus the further timeliness of the rail link to Pearson Airport.

To these ends, we are pleased to offer four recommendations with respect to the Terms of Reference for the Georgetown Pearson IEA.

We would note that, of our total membership in the GTA, over one-third of our members live in the study area of the Georgetown Pearson IEA. As a group of transit users, we therefore speak with some authority regarding the need for expanding and improving transit in the GTA.

Recommendation 1. Consideration of Long-term Intensive Train Frequencies on the Georgetown GO Transit Route.

We find the present TOR deficient with respect to considering the future frequency of GO train service on the Georgetown route (aside from possible train service into the airport along the Georgetown route). Although Exhibit 2-1 of the TOR calls attention to all-day service, an explicit statement needs to be in the TOR that transportation demand modeling will take into consideration an intensive all-day two-way train service in the Georgetown corridor similar to the service evolution widely desired by transit consumers in the GO Transit Lakeshore corridor.

A more intensive service on the Georgetown route should also envisage the possibility of alternatives to locomotive powered trains. An all-day network of intra-regional rail service would likely draw on new DMU (diesel multiple unit) technology designed to facilitate the change from peak-hour only commuter operations to all-day services more akin to urban rapid transit.

The desirability of all-day two-way rail services in the GTA can be found in many government reports and private reports such as the study by the Toronto Board of Trade published in the year 2000.

Recommendation 2. Design Alternatives and Mitigations in the Weston/Mt. Dennis Area

It is well-known that the communities of Weston and Mt. Dennis were severely distressed with plans for a major increase of train frequencies through their communities that they perceived would be especially generated by the proposed Union Station-Pearson Airport train service. These communities were additionally distressed because the detailed designs offered for their segments of the rail corridor provided massive civil engineering works with very large community impacts. These included huge bridges or underpasses based on extravagant clearances that involved significant condemnation of adjacent private property, or a trench design that involved closure of a key local street (but excluded the freight rail line in the corridor). In brief, the designs offered were grossly out-of-scale in the Weston/Mt. Dennis community setting, and were also out-of-scale when compared to the way other railway lines in the city have been grade-separated in earlier times.

At issue here is a detailed design which embodies significant mitigations of impacts that these two community will experience as a result of eventual service intensification on the Georgetown rail line.

The evaluation criteria of the TOR do not provide the Weston and Mt. Dennis communities with assurance that they will be offered design alternatives that minimize impacts.

A key problem is that, in Table 6-1 and in accompanying text of the TOR, no reference is made to achieving a best design which minimizes intrusion into the Weston and Mt. Dennis communities, that may be innovative, though may carry somewhat higher overall capital costs.

It should be noted that this is a particular problem for the Weston/Mt. Dennis area on the Georgetown route (similar problems may exist at some other locations) because the CN and CP railway track is at ground level directly adjacent to commercial and residential quarters. There is also a great deal of people movement in this rather confined area that is the center of Weston/Mt. Dennis. The community concern with detailed design is therefore quite understandable.

The TOR in Table 6-1 refers to "Adherence to applicable design standards and guidelines," with preceding text referring to alternatives that "are efficient/direct and meet technical objects/design

requirements, but also minimize/avoid impacts to significant environmental and study area features to the extent possible." Citizens of Toronto could reasonably ask how an innovative design, one that uses more expensive materials (more structural steel and less cement, for instance), and one that uses, say, historically lower clearances that still accommodate emergency vehicles, would be possible under the terms of reference as indicated above? The language quoted above needs to be clarified by some further rules.

In the interest of a design alternative with low environmental impact, and that fits the scale of the Weston/Mt. Dennis area, we recommend an additional paragraph in 6.1 of the TOR that states explicitly: (1) Civil engineering detailed designs shall include consideration of design innovations that minimize community impacts and that such designs shall be preferred over designs that sacrifice low impact to achieve overall cost reduction. (2) Standards and guidelines will be followed to achieve strength and safety standards, but that clearance dimensions shall be open to minimizing environmental impacts by having profiles that match the non-arterial character of the streets that cross the railways at present and match similar profiles that are found at other grade separations in the old City of Toronto, for example along most of the CPR railway line that parallels Dupont Street to the north.

Recommendation 3: That the TOR Include a Further Elaboration as to Purpose in Section 2.0 Regarding Service to Northwest Toronto and the LBPIA

Northwest Toronto and the adjacent Airport area are poorly served by transit. Even an hourly service on GO would not meet transit needs in these areas. Rail service that meets today's mobility needs in urban areas require at minimum every 20 minute service 20 hours a day, at the same fares as bus transit. The reality is that this part of the GTA is unlikely to see any future subway construction. (The Spadina subway even when extended is not much of an option due to its distance to the east.) A rapid transit type of service thus falls into GO Transit's domain given the well placed Georgetown rail right of way. It needs to be highlighted that there are large population, commercial and industrial centers in the area providing employment and residences. The potential for further transit-oriented residential and commercial development in the corridor is significant. While the TOR highlights the importance of moving air travelers from Pearson Airport to and from downtown Toronto, the many other transit needs of the area require emphasis. To the transit needs of Northwest Toronto should be added transit needs of airport employees themselves, the adjacent hotel/service sector employees, and nearby industries.

At the same time, as southern Ontario's population grows, there will be a growing need to expand GO rail service west of Georgetown to Guelph and potentially Kitchener-Waterloo (and/or increased VIA service). That will mean more calls for express service within the City of Toronto/GTA. At some point, GO will have to face instituting two levels of service (as on the Lakeshore line), with local and express trains. There are numerous examples of commuter rail lines that have evolved into high capacity all-day transportation corridors based on a mix of local and express trains. The Lakeshore route is evolving in this direction, and there are examples elsewhere including in the New York City area.

Recommendation 4. Add Explicit Consideration of LRT and DLRT in the Elaboration of "(iii) Surface rail service..." in Section 5.1.2

Over the past 30 years in North America there has been a rebirth of surface, or largely surface, rail rapid transit on corridors similar to the Georgetown route. Electrically powered light rail transit (LRT) lines have opened in Edmonton and Calgary, Alberta, and in an expanding number of US cities on such rights-of-way.

More recently in North America, diesel light rail transit (DLRT) has been successfully instituted in a number of places. In most of these situations, DLRT was chosen in order to obtain the benefits of rapid transit in the absence of the financial ability to take on the added cost of electrification associated with LRT. DLRT is in use between Trenton and Camden, New Jersey, and will be soon opened on a route just north of San Diego, California. It is being considered as the technology of choice for the Esquimalt and Nanaimo Railway on Vancouver Island between Victoria and Duncan, BC. DLRT was highly successful in Ottawa, Ontario using equipment approved by Transport Canada.

DLRT's popularity lies in the fact that it is less expensive than LRT because it does away with electric power supplies, and that, depending on the equipment specified, it can safely run with other train types. It can provide rapid transit quality service for the fraction of the price of a conventional grade-separated elevated or subway rapid transit, with efficient one-person-operation of short trains matched with low-cost short platforms.

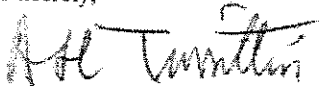
The Georgetown corridor would be helped greatly by DLRT. It would speed up service to local communities and to employment centres compared with subway and bus options, while permitting more attractive express service for longer distance GO riders. Airport and airport-vicinity employees would find this service much more convenient to their needs than the limited-stop LBPIA-downtown/Union Station express trains. With swift acceleration and deceleration, DLRT could serve more stops than GO operations. Additional stations might could include Eglinton West, St. Clair West, the Junction, Dundas/College, Parkdale (Queen Street West) and Bathurst.

Frequent DLRT service could bring transit-oriented-development (residential and commercial) with property tax revenues helping to pay for Georgetown corridor upgrades. Much of the corridor south of Weston is populated by aging, outmoded industrial buildings that could be redeveloped into new housing and commercial buildings, just as rapid transit led to a similar rejuvenation of the Skytrain rail corridor in Vancouver.

Lastly, by improving transit service to local communities, DLRT would make the rail infrastructure improvements planned for the corridor more justifiable. Many residents and businesses feel the current proposed upgrading of the Georgetown corridor benefits only air travelers and 905 commuters. Providing fast, frequent, attractive and low cost rapid transit to the communities on this corridor is therefore a matter of social equity.

In closing, on behalf of Transport 2000 Ontario, we take this opportunity to commend the future investments that are planned for the Georgetown line of GO Transit. These infrastructure improvements, to be followed by service increases, are long overdue.

Sincerely,



Tony Turrittin, Co-Chair, Pearson Airport Access Committee
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