



P.O. Box 89052
HAMILTON, ONTARIO L8S 4R5

May 27, 2011

Chairman and Members
General Issues Committee
City of Hamilton
71 Main St. W.
Hamilton, ON L8P 4Y5

Dear Chairman and Members of the General Issues Committee:

**Re: NGTA Corridor Planning and Environmental Assessment Study – Phase 1,
Draft Transportation Development Strategy (PW05054b/PED10213a) – (City Wide)**

Attached for your information is the detailed response of the Hamilton Naturalists' Club to the NGTA Study Team's request for comments on the Draft Multi-Modal Transportation Development Strategy for the NGTA Corridor Planning and Environmental Assessment Study.

To summarize our attached letter, the HNC continues to urge the Study Team and the City of Hamilton to focus on alternatives to major highway infrastructure, especially rail and transit, as the most sustainable way to meet the area's transportation needs in the long run.

In contrast to the previous Council resolution, we applaud the Ontario government for rejecting the proposed "Mid-Pen" highway from Fort Erie to Highway 403 as the preferred option, based on the findings of the Study Team that widening of the QEW and additional HOV lanes will be able to address anticipated growth in traffic. We strongly support GO Transit's staged plans to expand rail services in Hamilton and Niagara and proposals for new inter-regional transit links.

We do not support a proposed corridor route between Highway 403 and 407 ETR, nor do we support an alternative corridor between Highway 403 and 401, for reasons outlined in our attached letter. We are also opposed to the potential widening of Highway 403 through Hamilton, which we regard as a non-starter.

We are encouraged by the considerable detail in which the NGTA Study Team, in its tables on Natural Environment Findings, outlines the serious negative ecological damage that new corridors will involve.

Hamilton Naturalists' Club is a non-profit organization dedicated to the study, appreciation and conservation of our wild plants and animals.
All work is freely done by Directors, Officers and Members.



The Study Team's documentation illustrates what is at stake in regards to the environmental impact of new corridors. We urge the City of Hamilton to take this documentation into account in working with the province to develop a sustainable transportation system.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Lamond". The signature is fluid and cursive, with a period at the end.

Bill Lamond
President
Hamilton Naturalists' Club
Protecting Nature Since 1919

Attachment



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HAMILTON, ONTARIO L8S 4R5

May 27, 2011

NGTA Study Team
c/o URS Canada Inc.
75 Commerce Valley Drive East
Markham, Ontario L3T 7N9

Dear Members of the NGTA Study Team:

Re: The Draft Multi-Modal Transportation Development Strategy for the Niagara to GTA (NGTA) Corridor Planning and Environmental Assessment Study

The Hamilton Naturalists' Club (HNC) is a 650-member strong, incorporated, non-profit society dedicated to the study, education and conservation of the plant and animal life of the greater Hamilton region. The Club is actively involved in nature reserve management and the rehabilitation of plant and animal habitats. The HNC has produced numerous publications during its 90-year history and its members are heavily involved in volunteer public service for the furtherance of nature education, conservation and management. In addition, the Club has been instrumental in initiating and directing comprehensive Natural Areas Inventories for greater Hamilton and Halton Region, in which all species and communities of terrestrial plant and animal life, including birds, are mapped and listed by location and habitat. All of our publications and projects, and nature reserve activity, are detailed on our website, www.hamiltonnature.org

The purpose of this letter is to underline our opposition, expressed in the HNC letter of July 26, 2010 by Terry Carleton, our Director of Conservation and Education, to the possible construction of a new highway corridor from Highway 403 to 407 ETR as well as an alternative new corridor from Highway 403 to Highway 401. Our reasons are outlined later in this letter. We are also opposed to the idea of widening Highway 403 through Hamilton, which we regard as a non-starter.

We applaud the Ontario government for abandoning the proposed highway known as the "Mid-Pen" from the Niagara/Fort Erie area to Highway 403, based on the findings of the Study Team that widening of the QEW and additional HOV lanes will be able to address anticipated growth in traffic volumes. We are pleased to learn that Hamilton will get two GO stations possibly as soon as 2015 --- one at James Street North and one at Centennial Parkway --- as well as a station at Casablanca Boulevard in Grimsby, if the findings of GO Transit's Niagara Rail Service Expansion Class Environmental Assessment Study are implemented. We strongly support GO Transit's staged plans to expand rail services in Niagara.

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In contrast, we believe that a Mid-Pen highway would not only be much more costly, but would also severely impact watercourses, significant wetlands and forests, and fragment natural areas and farmland. Proponents of the Mid-Pen, such as the Niagara Economic Development Corporation, are too heavily focused on a new highway as the key component in meeting future transportation needs. On that score, we do not support the position of the Southern Ontario Gateway Council, which is advocating for a highway corridor between the 403 and 401 instead of improvements to the QEW.

After reviewing the Strategy documents, we continue to believe that optimization of the existing transportation network, and much-improved non-road infrastructure such as rail and transit, should be given much greater priority in order to achieve cost-effective, environmentally sustainable transportation solutions. While there is some --- and most welcome --- discussion of non-road infrastructure in the documentation, it is fairly general in nature. We welcome the reference to new inter-regional transit links between urban growth centres, especially new passenger rail services on existing or new rail corridors. We believe there is an opportunity for bold new thinking to engage the public about the potential of high-speed train services as the price of gasoline continues to rise. Even without the added burden of a new highway corridor costing as much as \$6 billion or \$7 billion, maintaining and improving our existing highway network continues to present environmental and financial challenges. In our view, the Ministry of Transportation should make every effort to engage the federal government in promoting inter-regional transit, passenger and freight rail and marine goods movement with a greater sense of urgency than we have seen so far.

The construction of new highway corridors will inevitably promote costly urban sprawl and entail severe consequences for the environment with the loss of precious natural areas, valuable wetlands and agricultural lands. This is a short-sighted approach, especially at a time when climate change requires a reduction in carbon input by humans. Prudent planning dictates that future transportation planning should maximize energy efficiency through trains, buses and other forms of public transit. Promoting sprawl that inevitably comes from new highways seems counter to the Province's efforts through the Growth Plan and Greenbelt Plan to protect important natural features while still planning for growth.

With regard to specific highway corridor routes under consideration, we first would like to applaud the Study Team for outlining, in considerable detail in the tables on Natural Environment Findings, the serious negative ecological damage that new corridors will involve. The Study Team's documentation certainly illustrates what is at stake as far as damage to the natural ecosystem is concerned. We are pleased to see that the Study Team does not appear to support the widening of Highway 403 through Hamilton to ten lanes. As the documentation points out, such a plan would have grave consequences for natural jewels such as Cootes Paradise, the Royal Botanical Gardens, community parks and trails, and involve significant damage to the Niagara Escarpment, a UNESCO Biosphere Reserve, in the area of Highway 403. Negative community and economic impacts would also result, as is pointed out.

As for the proposed corridor route between Highway 403 and 407 ETR, we believe that it would cause irreparable damage to the Niagara Escarpment, as well as the Greenbelt. It would increase pressure to urbanize north Burlington, with the loss of beautiful woodlands and precious agricultural land. We have observed a significant groundswell of community opposition to the idea of a 403-407 ETR highway, which we share. There is also significant community opposition, which we share, to an alternative corridor route from Highway 403 to Highway 401, as shown at a public meeting in Carlisle on May 19. This route would require crossing the dense network of watercourses and wetlands associated with Beverly Swamp, Fletcher and Spencer Creeks. These large wetlands, at the headlands of three major watersheds, are invaluable to a healthy ecosystem by providing clean water and helping to control flooding. In addition, watercourses through this section are identified as having endangered Redside Dace and the high-quality habitat supports resident Brook Trout populations. In this day and age, sensitive watercourses and wetlands --- particularly on this scale --- should be regarded as untouchable. The loss of farmland in Flamborough would be another major drawback.

Our final point is to reiterate a concern outlined by Citizens Opposed to Paving the Escarpment, which has suggested that population and employment forecasts in the documentation are inflated. We agree that the forecasts are too high, especially given continued uncertainty about the rising price of oil, climate change, the effects on air quality and the overall cost-benefit of the project.

The Hamilton Naturalists' Club continues to urge the Study Team to focus on alternatives to major highway infrastructure as the most sustainable way to meet the area's transportation needs in the long run. We look forward to hearing your decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Lamond". The signature is fluid and cursive, with a large initial "B" and "L".

Bill Lamond
President
Hamilton Naturalists' Club
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