HAMILTON CHAMBER OF COMMERCE

Mid Peninsula Trade Corridor

The Mid Peninsula Trade (or Transportation) Corridor (MPC) (now referred to provincially as the "Niagara to GTA Corridor") is, in part, a proposed new Provincial highway. The principal goal of the proposed project is the development of an effective trade and transportation corridor between the border crossings on the Niagara Frontier, southwestern Ontario, and the GTA; to link with Continental One and otherwise meets the evolving needs of residents, industry, tourism, transportation, and governments. The need to move ahead with a Mid Peninsula highway is critical and urgent. Ontario's oldest. Largest and most broadly based business organization the Ontario Chamber of Commerce, representing 59,000 businesses in 140 communities across the Province, strongly supports this project.

BACKGROUND

In June 2001, the Premier of Ontario and the Minister of Transportation announced completion of the draft Niagara Peninsula Transportation Needs Assessment study. The needs assessment study was a technical exercise, involving a comprehensive examination of future transportation problems, opportunities, and a range of transportation alternatives including road, transit, rail, ferry and other options. Various travel and growth scenarios were considered for a 30-year planning period.

The needs assessment study indicated that significant additional transportation capacity would be required through the Niagara Peninsula into the Greater Toronto Area to accommodate future growth in the movement of people and goods. The needs assessment study proposed a broad multi-modal "Transportation Development Strategy" to ensure adequate transportation network operations over the long term.

On the basis of the technical recommendations from the Needs Assessment, the Ministry of Transportation commenced the formal EA process, starting with an EA ToR, for the development of a new transportation corridor in the Niagara, Hamilton and Halton area (referred to as the Mid-Peninsula Transportation Corridor). In support of the EA ToR process, MTO completed extensive municipal, agency, stakeholder and public consultation between March 2002 and May 2003.

Following the consultation program, MTO submitted the Mid-Peninsula Transportation Corridor EA ToR to the Minister of the Environment (MOE), for approval, in May of 2003. In response to comments received from key stakeholders, MTO withdrew the EA ToR from MOE consideration in the summer of 2003.

The "Niagara to GTA Corridor Environmental Assessment Terms of Reference" (which supersedes the document from May 2003) outlines the framework for completing an Individual EA study. This document has been extensively revised/restructured in direct response to the stakeholder comments received. Specifically, this document supports the process for an un-scoped individual Environmental Assessment (commonly referred to as a "Full EA").

The "Niagara to GTA Corridor EA ToR" will be submitted to the Ministry of the Environment (MOE) under Section 6 (2)(a) of the Ontario Environmental Assessment Act (OEAA). Under such a process, the subsequent EA will consider every phase of the planning process including need, alternatives to the undertaking (i.e. roads, transit, rail, etc.), alternative methods, and recommendations for specific infrastructure as required including the associated impacts and mitigation measures. The deadline for responding to this proposed ToR is May 4, 2005.

A draft Niagara to GTA Corridor EA ToR document has been prepared and is available for public and agency review. Please refer to website www.niagara-gta.com for further information.

Proposed Chamber Response to the EA ToR:

As outlined above, the original ToR that was submitted to MOE in May 2003 was withdrawn from Ministry of the Environment consideration "in response to comments from key stakeholders". Yet, during the public consultations of 2003, the public did not express any material concerns about the original Proposed EA Terms of Reference *for the Hamilton-Niagara* stretch of the proposed highway. Indeed, there is already widespread support for a Mid Peninsula highway from the area most in need of it; i.e. from Niagara to Hamilton. For example, in an independent public opinion survey commissioned from Hendershot Research Consultants by the Hamilton Chamber of Commerce in June 2004, public support for the MPC throughout the City of Hamilton was in the range of an overwhelming 79% (+/- 5%, 19 times out 20, etc.).

Thus, the withdrawal of the original EA ToR ignores this widespread support in the Niagara-Hamilton areas, at least, and relied solely on stakeholder comments from the Halton area. In response to the Provincial invitation to comment on the new "draft" EA Terms of Reference now before us, in the interests of expediting this long overdue infrastructure, much of the earlier work done for the previous EA, already concluded, should be allowed to stand. While, not indifferent to the stakeholders in Halton, however, the stakeholders in Niagara and Hamilton deserve at least equal consideration. Thus, we propose that the Needs Assessment completed in 2001 and the original EA ToR of 2003 be re-visited for the Niagara to Hamilton areas and incorporated into the EA on a stand alone basis, if need be.

In keeping with public safety and security issues, current transportation options are limited in the Niagara-Hamilton areas, posing a significant threat to the ability to move people through the Golden Horseshoe. Current congestion is not only a hindrance to trade and economic development, it also has a serious impact on public health in terms of added stress and the breathing of increased airborne pollutants caused by slow moving traffic.

Conclusion

A effective response to the draft EA ToR should based on the shared imperative that a Mid Peninsula Trade Corridor (including a highway) from the Niagara Frontier border crossings through Hamilton to join the "400" series highways serving the GTA, is a vital first step in meeting the present and future economic, social, cultural, and public health needs of Ontario.

Recommendations:

We recommend, with respect to the Terms of Reference (ToR) for Environmental Assessment of the proposed Mid Peninsula (Niagara to GTA) Corridor, that the Provincial Government:

- 1. Split the scoping requirements of the for the Mid Peninsula Corridor so that the Niagara-Hamilton portion of the highway can proceed close to the original timelines; i.e. if an unscoped EA is seen as necessary for Halton portion, that need should be addressed separately.
- 2. The revised ToR acknowledge the greater urgency that exists in the Niagara-Hamilton areas for immediate transportation capacity relief in keeping with long-term strategic plans for this area
- 3. Consider other Alternatives to the Undertaking, the operation of a commercial vehicle-only lane(s) (trucks, delivery vehicles, and buses) along a new mid peninsula corridor.
- 4. The Public Health impact of both operating a new Mid Peninsula Trade Corridor and also not operating such a corridor should also be considered.
- 5. Broaden the study area to include viable connections from the Niagara-Hamilton highway to the Brantford, Guelph, Kitchener-Waterloo, and Cambridge areas.
- 6. Rely on accepted scientific principals of urban transportation planning and Human Factors science rather than the "reasoned argument method".
- 7. Implement a stakeholder identification and accreditation process that includes resident and non-resident stakeholders in the consultation process and assigns appropriate weight to stakeholder input.