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VIA ELECTRONIC MAIL

Kathleen Wynne, Premier of Ontario
Chris Ballard, Minister of the Environment and Climate Change
Kathryn McGarry, Minister of Transportation

Dear Premier Wynne and Ministers Ballard and McGarry:

Re: High Speed Rail (HSR) Environmental Assessment

Oxford County is aware that the Ontario Ministry of Transportation (MTO) is about to take the important step of initiating the environmental assessment study process for the proposed High Speed Rail (HSR) Environmental Assessment, a project with significant potential long-term implications for our County and the Province as a whole. We understand that the critically important first phase of this process will involve the development of a Terms of Reference for the HSR Environmental Assessment (EA) and the associated *Canadian Environmental Assessment Act* (CEAA) approval process. This is a process that the County very much supports

The purpose of this letter, however, is to bring to your attention the County's grave concern with what appears to be a fundamental deficiency in the EA study process that the MTO is about to commence.

Specifically, it has come to our attention that the MTO may be considering narrowing the scope of the environmental assessment study process to exclude the consideration of alternatives to HSR and focus strictly on corridor variations and mitigating measures. As discussed below, in our view this would be a fundamental mistake which would not only contravene the purpose, intent and requirements of Ontario's *Environmental Assessment Act*, but arbitrarily eliminate, without appropriate consideration, a viable and potentially preferable option.

The first stage of the Ontario *Environmental Assessment Act* approval process involves the development, with public consultation, the Terms of Reference for the environmental assessment studies to follow. While this process does allow for some scoping of alternatives, it does not, in our view allow for the arbitrary elimination of viable and reasonable options. Further, scoping the EA to such a significant degree is entirely contrary, in our opinion, to the "comprehensive environmental assessment" emphasized by the Premier in her May 19, 2017 release announcing the intent of the government to initiate the HSR EA.

In particular, the approach that MTO appears to be adopting would eliminate, without appropriate study or stakeholder consultation, a viable, proven alternative to HSR which appears to have potential as a far more effective and cost effective approach: **High Performance Rail**.

The High Performance Rail (HPR) alternative, when integrated with an extensive inter-community transportation system, has been proven around the world, and in fact right here in Ontario, to be a fast, frequent, reliable and affordable intercity/regional passenger service.

For over 50 years the GO Transit HPR rail network, integrated with an extensive GO Transit Bus feeder system used to supplement rail service and cultivate emerging passenger markets, has been serving the Greater Toronto and Hamilton Area, and points beyond quite successfully. Oxford contends that a distinct but similar rail/bus network serving Southwestern Ontario from Toronto to Windsor is highly viable and feasible.

One key advantage of HPR is that it can be implemented in a much more timely and cost-effective manner than HSR thereby addressing Southwestern Ontario's immediate and pressing inter-city transportation needs. HPR would not require a new rail corridor and can be phased in incrementally and far more quickly than HSR. HPR offers a lower cost, operationally effective rail network (passenger and freight) across Southwestern Ontario without the dramatic community and agricultural impacts of a new rail corridor.

A failure to consider this alternative to the concept of the HSR proposal as part of the EA process will mean that Ontario stakeholders will be deprived of an assessment which compares HPR with establishing a new rail corridor based on key decision-making factors and associated incremental risks including:

- Impacts on the Natural Environment
- Weather-related delays and quality control issues
- Cost control
- Lifecycle costs
- Supplier and contractor Interface
- Revenue/ridership

While developing and properly assessing this option will require cooperation and coordination with other industry stakeholders, the assessment process itself has advantages. With multi-stakeholder consultation and coordination come strategic and incremental implementation opportunities that will result in earlier implementation.

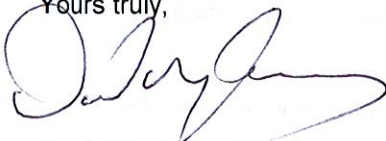
More information on HPR is provided in the attached brief. We would respectfully request you take the time to review this information.

The County of Oxford is very concerned that MTO is considering commencing a crucially important study and decision-making process vital to the long term economic and social wellbeing of our County, Central and Southwest Ontario for generations to come. Arbitrarily eliminating, without full study and stakeholder consultation, an alternative which in the end could have proven to be vastly superior to HSR runs counter to the interests not only of the County of Oxford but of all Ontarians.

On behalf of Oxford County and in the best public interest, I ask the Premier to confirm that the HSR Environmental Assessment will include a complete and thorough comparative assessment of the High Performance Rail alternative.

We look forward to your favourable response

Yours truly,



David Mayberry, Warden

Attach.

Copy to: Ernie Hardeman, MPP (Oxford), Patrick Brown, Leader of PC Party of Ontario, Andrea Horwath, Leader of Ontario New Democratic Party, Mike Schreiner, Leader of Green Party of Ontario, Ms. Jennifer Graham-Harkness, Director of High Speed Rail, MTO