

Transportation Committee meeting, March 2, 2022
Submission of the Greenspace Alliance of Canada's Capital

In regard to the final staff report on the Brian Coburn / Cumberland Transitway (Navan Road to Blair Road) Environmental Assessment Study, we strongly oppose the City's preferred option 7, as we stated in the initial consultations in December 2019. This option is in our opinion the most environmentally disruptive. If built at this location, the road will further fragment protected Greenbelt lands and degrade the ecological integrity of the Mer Bleue wetland complex. As stated previously, Option 1 would be our preferred choice as it uses an already urbanized corridor, is the least disruptive to the local ecology and preserves the greatest amount of greenspace.

We reiterated this position in the final consultations in July 2021, adding that in our view this evaluation was not conducted applying a climate lens. The mitigation and adaptation benefits of preserving an intact greenbelt have simply not been given appropriate weight in the evaluation of the different options. We also expressed our disappointment that the study persisted with options which the NCC had made it clear it would not support. A declaration by its Board of Directors that it would not make the subject land available for the City's preferred option was given no weight in the evaluation of options.

So we are even more shocked to see Option 7 retained as the preferred option in this final report. Is this a deliberate attempt to provoke a conflict between the City and the NCC? If so, it would seem to us a poor exercise of governance. The staff report implies that they are compelled to do so: "Notwithstanding the NCC's position, the city was required to follow the EA process in accordance with the EA Act of Ontario and has proceeded with the Technically Preferred Option 7. "

Staff also notes that the proposal would need the approval of the NCC through its own process for federal land use, in effect punting the decision over to the NCC.

"Although this EA study is following the EA Act of Ontario, NCC approval will be required for the implementation of the Recommended Plan since it is subject to the "Federal Land Use, Design and Transaction Approval Process" (FLUDTA). As a prerequisite to issuing a FLUDTA, this project must also complete a federal environmental assessment in accordance with the federal Impact Assessment Act,"

Why not avoid wasting everyone's time on a process the outcome of which is known in advance and work instead on a solution that satisfies everyone's needs? Option 1 delivers on a transitway extension for residents of South Orleans, meets with NCC approval, is broadly supported for environmental and climate reasons, and is highly rated even within the study's own framework, coming in second according to the factors and weights applied. Please steer staff in this direction rather than approve a recommendation that is environmentally harmful and essentially a dead letter.

Paul Johanis
Chair, Greenspace Alliance of Canada's Capital