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**Sent via e-mail**

Honourable David L. Emerson, P.C.  
Chair, Canada Transportation Act Review Secretariat  
350 Albert Street, Suite 330  
Ottawa, ON K1A 0N5  
([secretariat@reviewcta-examenlrc.gc.ca](mailto:secretariat@reviewcta-examenlrc.gc.ca))

**Re: City of Toronto's Comments on the Review of the *Canada Transportation Act***

Dear Mr. Emerson,

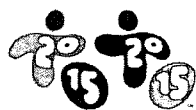
The City of Toronto appreciates the opportunity to provide comments on the Review of the *Canada Transportation Act* (CTA) (the Review). Modernizing the national transportation system that underpins Toronto's economy is critical to the City's global competitiveness and Canada's international trade leadership. The safe, efficient movement of people and goods into, through and out of Toronto is a top priority for increasing regional productivity.

Toronto appreciates the Review's focus on transportation as it relates to promoting trade and economic development. Investing in export corridors and gateways, as well as preparing small and medium sized enterprises for global export opportunities, elevates the playing field on which Canadian firms can compete internationally.

The City of Toronto's comments on the CTA Review are focused on the need for investment in municipal transportation infrastructure, respect for regional economic priorities, continued improvement on rail safety, and results-based environmental stewardship. Details are outlined below.

**1. Funding for Municipal Transportation Infrastructure**

Toronto supports the Federation of Canadian Municipalities (FCM) position on the importance of long-term, predictable and flexible funding to build municipal infrastructure that is critical to economic growth and Canada's transportation system as a whole.



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Canada's cities and metropolitan regions are integral to the success of the national economy. The Toronto region generates one-fifth of Canada's Gross Domestic Product (GDP). Over \$300 billion in goods and services (GDP 2013) are produced in the Toronto region, larger than the GDP of most provinces.

Recent studies conducted for the Toronto Region Board of Trade show that the Toronto region's productivity is falling behind North American peer regions. Between 2000 and 2010, the Toronto region ranked ten out of 12 jurisdictions in productivity. Traffic congestion, cost of moving goods and increased commute times play a role in the region's declining productivity rate. Investment in the maintenance, rehabilitation and expansion of urban transportation networks is critical to keep pace with population growth and to facilitate the efficient movement of people and goods in Canada's urban centres.

## 2. Regional Economic Priorities

*"Transportation ... has been an enabler for economic development."* – CTA Review Discussion Paper

The City request that the Review adopt a place-based approach to transportation planning that appreciates Canada's regional economic variations and priorities, for instance the importance of the efficient movement of people and goods to Toronto's economy.

The value of Southern Ontario's highway and border crossing systems, already central to the domestic trucking economy, is expected to grow as trade ties with emerging economic powers in South America develop and the United States economy recovers. The City encourage the Review Team to consider the incremental volume of transcontinental trips generated by deeper access to these major markets and the federal government to invest in the gateway and corridor infrastructure that helps move advanced manufactured goods to international markets.

The CTA Review Discussion Paper highlighted the role that financial incentives play in determining how trip flows are distributed across different transport sectors, particularly the air sector.

"[Some] modes of long distance transport such as air, marine and rail freight are almost entirely self-financed based on user charges ... This has implications for achieving the right balance of investment across the various modes of transportation and could spell trouble for the long term competitive position of Canadian air carriers, airports and possibly marine ports."

Ensuring cost-effective, safe and streamlined airport experiences is a goal shared by the City of Toronto and the Review Team.

### 3. Continuous Improvement on Rail Safety

*"The catastrophic "Lac Mégantic derailment ... [has], for various reasons, made the consideration of issues related to rail transport an early priority for the CTA Review."* – CTA Review Discussion Paper

The Lac Megantic event raised concerns about rail safety and the transportation of dangerous goods through populated areas. While Toronto commends the numerous operational, regulatory and legislative rail safety measures undertaken and under consideration by the federal government to date (e.g. emergency planning and reducing the safety risks related to the transportation of dangerous goods by rail), the City would appreciate the Review Team's consideration of further improvements to rail safety in the following areas:

- Encourage Transport Canada to proactively work with freight rail owners to provide residents data about the volume, material type and frequency of hazardous materials travelling through their neighbourhoods and municipal boundaries.
- In emergency situations, Toronto asks that first responders be provided with timely information and the necessary equipment and supplies to address specific dangerous goods involved in rail disasters.
- Review the state of good repair and safety along rail line corridors in the wake of emergencies.
- Ensure that the outcomes of the risk assessments that railways are now required to undertake, which includes an analysis of alternative routes, are made available to municipalities and the public.
- Move forward with enhanced tank car standards as outlined by the Federation of Canadian Municipalities to transport dangerous goods, including that tank cars be constructed with thicker steel and enhanced braking technologies.
- Meet the 3-year commitment to phase-out DOT-111 tank cars by May 1, 2017 as advocated by the Federation of Canadian Municipalities.
- Engage the railway companies to work with municipalities to implement the Federation of Canadian Municipalities and Railway Association of Canada best practice guidelines to set new development back 30 metres from rail corridors with an earthen berm within the setback.
- Review access to railway corridors including pedestrian access and the state of fencing along the rail lines to maximize safety.

### 4. Results-based Environmental Stewardship

*"There is growing public concern with the impact that environmental pollution and carbon-dioxide emissions will have on the future quality of life and the livability of communities."* – CTA Review Discussion Paper

Pollution from vehicular traffic, and particularly truck traffic, is an important concern for the City of Toronto. An analysis of greenhouse gas (GHG) emissions and air quality pollutants carried out by the City identified that approximately one-third of Toronto's GHG emissions

are attributed to transportation (road vehicles), and that a disproportionate amount of the most harmful air pollutants came from trucks.

While Toronto lauds the intent of the federal *Regulations Amending the Sulphur in Gasoline Regulations* and the *Notice of intent to develop regulations to further reduce greenhouse gas emissions from on-road heavy-duty vehicles and engines*, the CTA Review presents an opportunity to consider national steps for increasing the energy efficiency of the goods movement system, including:

- Moving forward with proposed regulations to reduce GHG emissions from on-road heavy duty vehicles and engines for model year 2018 and beyond and developing new regulations for existing older vehicles.
- Working with the trucking industry on a plan to accelerate phasing out the use of the most polluting, older trucks still on the road today.
- Providing rating information to vehicle buyers about a model's GHG and smog-pollutant emission levels to enhance consumer choice and enable an informed purchasing decision. For example, the United States has pioneered the Smartway Program with these goals in mind and could be a useful model on which Canada can build to manage heavy duty vehicle emissions domestically.

The City appreciates the opportunity to provide its comments on the CTA Review. If you have any questions or would benefit from additional information, please contact me at 1-416-392-3551 or via email at [jpennac@toronto.ca](mailto:jpennac@toronto.ca).

Yours truly,



sw Joseph P. Pennachetti  
City Manager

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