



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Constituent Societies
 Alliance for Healthier Communities

Association of Public Health
 Epidemiologists in Ontario (APHEO)

Association of Supervisors of
 Public Health Inspectors of Ontario
 (ASPHIO)

Canadian Institute of Public Health
 Inspectors - Ontario Branch (CIPHIO)

Community Health Nurses'
 Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public
 Health Dentistry (OAPHD)

Ontario Association of Public Health
 Nursing Leaders (OAPHNL)

Ontario Dietitians in Public Health
 (ODPH)

Ontario Society of Physical Activity
 Promoters in Public Health (OSPAPPH)

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August 28, 2021

Ms. Katerina Downard
 Environmental Policy Office, 777 Bay Street
 Suite 700 , Toronto, ON
 M7A 2J8 Canada

RE: ERO # 019-3839 – Greater Golden Horseshoe Transportation Plan – Discussion Paper

Dear Ms. Downard,

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide input on the Discussion Paper to inform the development of a long-term transportation plan for the Greater Golden Horseshoe. In addition to the on-line survey, OPHA has compiled the following comments.

A growing body of research identifies that the way our communities and transportation systems are designed, built and operated can impact the health of residents. Transportation planning decisions influence greenhouse gas emissions which are responsible for climate change, impact exposure to traffic-related air pollution, influence urban sprawl, impact agriculture and green spaces and influence health behaviours. Each of these in turn impact rates of chronic diseases, such as heart disease and diabetes, related conditions such as obesity and physical inactivity, as well as air quality, cardiovascular and respiratory illnesses, water quality, access to healthy foods, noise levels, mental health, traffic-related injuries and health equity.

The Discussion Paper describes the transportation challenge (page 5): *“In planning the transportation system for the next 30 years, we have to consider many new challenges including economic transitions, new technologies such as automated and connected vehicles, and shifting demographics that will alter the way people use the transportation system.”* **One of the greatest challenges to transportation systems is, and will continue to be, climate change.** OPHA strongly encourages the Province to include as a priority, addressing the climate crisis, the impact transportation systems have on

greenhouse gas emissions, and the opportunities for a sustainable and equitable transportation system that if properly designed and implemented, can be a major component of climate action (to meet the Province's 2030 climate target), improved air quality, improved population health and environmental justice.

As noted in the Paper, the top 3 priorities identified through public input in the fall survey of 2020, were:

- Make transit as convenient as driving for getting where I need to go (66%)
- Make getting around healthier for me and for the planet (50%)
- Make better use of the roads, railways and other infrastructure we already have (40%)

While several of the actions identified in the plan support these priorities, they do not seem to guide the overall plan and some of the actions run counter to these priorities. The focus of the plan is on improving mobility; however, it must ensure that the balance is right to achieve a more equitable, sustainable and healthy path by 2051.

With the 2nd top priority being *"healthier for me and for the planet"*, the 2020 survey highlights the strong public support for a transportation system that is environmentally sustainable and health promoting. This calls for greater emphasis on low-carbon transportation and active transportation.

The 3rd top priority emphasizes public support for *"making better use of the roads, railways and other infrastructure we already have."* Making better use of the roads we already have and reducing congestion is best achieved through increased investments in public transit and active modes of transportation, not by adding more highways. Expanding and building new highways will increase air pollution and make it harder for Ontario to reduce the growing greenhouse gas (GHG) emissions from transportation, and to meet the Province's 2030 climate target of a 30% reduction from 2005 levels by 2030. In Ontario, transportation is the biggest source of GHG emissions responsible for 35% of total emissions. (Government of Canada Government of Canada, National inventory Report 1990-2018: Greenhouse Gas Sources and Sinks in Canada, 2020, Table A12-7, http://publications.gc.ca/collections/collection_2020/eccc/En81-4-2018-3-eng.pdf)

A recent assessment examining the impact of a new highway proposal relating to air pollution, greenhouse gas emissions and urban sprawl estimated that it would "make climate change worse and harm the health of people, communities, and sensitive ecosystems. It also shows how a new highway will help developers build out and not up, abandoning sustainable, dense, vibrant cities for sprawling car-dependent subdivisions that force people to travel even farther to get where they need to go." (Paving Paradise: The Impact of Highway 413 on Greenhouse Gas Emissions, Air Pollution and Urban Sprawl https://d3arzg0d19si6f.cloudfront.net/wp-content/uploads/2021/04/Highway-413-Paving-Paradise-Report_Environmental-Defence.pdf) The need for any highway expansion must be carefully examined to ensure it does not contribute to

sprawl, increase travel, increase exposure to traffic related air pollution, increase greenhouse gas emissions, and adversely impact green spaces and agricultural land.

The Discussion Paper (page 5) states that *“The highly urban core of the City of Toronto will rely on transit and active transportation to move masses of people. The rapidly growing suburban municipalities surrounding Toronto require more transportation options and better connections. Small towns, rural areas and Indigenous communities need right-sized options to access services.”*

While OPHA agrees that transportation options will differ among communities, **active and sustainable forms of transportation, can and must be priorities for all communities across the Province.** In developing the Transportation Plan for the Greater Golden Horseshoe, OPHA recommends that the Province apply the following guiding principles as noted in the National Active Transportation Strategy:

“Improving access and choice will bring a myriad of social, economic and environmental benefits, including health benefits as well as reductions in congestion, air and noise pollution, energy use and greenhouse gas emissions.”;

“Investing in active transportation will strengthen urban, suburban, rural and Indigenous communities across the country and deliver a better quality of life for all Canadians. Pathways and trails that make clean, green, and safe connections to public transit will make communities more healthy and liveable, and will give every Canadian a role in helping us reach our net zero emissions goal.”;

“Our vision is for Canadians of all ages, ethnicities, abilities, genders, and backgrounds to be able to safely and conveniently access active transportation in their communities, and to significantly increase the ‘modal share’ of active transportation: the proportion of Canadians who regularly make the choice to use active transportation.”;

“Our aim is to make data-driven and evidence-based investments to build new and expanded active transportation networks and to create safe environments for more equitable, healthy, active and sustainable travel options to thrive.” <https://www.infrastructure.gc.ca/alt-format/pdf/nats-snta/nats-strat-snta-en.pdf>

The Transportation Plan, and the actions that support the plan, require specific goals and timelines to ensure that the vision for a low-carbon, healthy, safe and equitable transportation system is achieved in the short and long term.

Many factors influence health. The plan would benefit from a strategic health impact assessment (HIA). This assessment would consider the social and environmental determinants of health, to

identify potential pitfalls, highlight opportunities to enhance health, and ensure that inequities are fully considered.

A VISION FOR MOBILITY IN 2051

The vision for mobility should be enhanced to add a 4th (first) pillar: **Prioritizing low-carbon, healthy, equitable and climate-resilient transportation systems.**

Prioritizing health in all transportation systems is best achieved through a “health in all policies” approach. This means ensuring that low-carbon transportation, active transportation and equitable public transit are top priorities in the hierarchy of transportation modes, for: (1) the movement of people for utilitarian or recreational purposes, (2) the movement of goods and services to support people, businesses and the economy, (3) the protection of our most vulnerable communities from the impacts of traffic-related air pollution, and (4) to help mitigate and adapt to climate change.

From a public health perspective, the biggest gap in the proposed vision is addressing climate change and air pollution. The Paper describes the proposed vision as “*an interconnected transportation system that provides a safe, seamless and accessible transportation experience for all.*” More and better-connected transit and walking and cycling paths are very important components but the vision must also include a transportation system that is low-carbon and non-polluting to address the public health implications of climate change and air pollution.

The transportation sector is the largest contributor of GHG emissions in Ontario (35% in 2018). While there is mention of climate change and Ontario’s climate goal for 2030, what is missing is an overarching goal for net-zero transportation by 2050, and a set of concerted actions to foster the transition away from the use of fossil fuels in the transportation sector. Except for transit-oriented communities, there is little attention paid the interaction between the transportation system and land use (sprawl), or the impact on natural ecosystems (agricultural lands and green spaces).

There is a significant body of evidence associating traffic-related air pollution (TRAP) to adverse health outcomes, including premature deaths, cardiovascular conditions, respiratory conditions and cancer. Given that health risk is highest near busy roads, and that a large percentage of the population in the Greater Golden Horseshoe lives, works, plays or commutes near busy roads, this is a serious public health concern. A 2020 report – *Clearing the Air: How Electric Vehicles And Cleaner Trucks Can Reduce Pollution, Improve Health And Save Lives In The Greater Toronto And Hamilton Area*, led by Environmental Defence and the Ontario Public Health Association, with health modelling carried out by the University of Toronto’s Transportation & Air Quality Research Group, estimated that traffic-related air pollution from trucks, cars and buses, is responsible for 872 premature deaths in the Greater Toronto Hamilton Area every year. <https://clearingtheair.ca>

Air pollution continues to be one of Canada’s biggest health and environmental challenges, with transportation being one of the largest sources of air pollution in Canada.

<https://www.canada.ca/en/environment-climate-change/services/air-pollution/sources/transportation.html> The government of Canada estimates that 15,300 premature deaths can be linked to air pollution from fine particulate matter, nitrogen dioxide and ozone. This includes an estimated 6,600 premature deaths in Ontario. The total economic value of air pollution in Canada is \$120 billion per year. (Health Impacts of Air Pollution in Canada: Estimates of morbidity and premature mortality outcomes – 2021 Report <https://www.canada.ca/en/health-canada/services/publications/healthy-living/2021-health-effects-indoor-air-pollution.html>) Passenger vehicles account for a large proportion of total national transportation emissions including approximately 21% of nitrogen oxide emissions, 51% of volatile organic compounds and 4% of fine particulate matter. <https://www.canada.ca/en/environment-climate-change/services/air-pollution/sources/transportation/cars-trucks-vans-suvs.html>

The health impacts of air pollution include comorbidities such as asthma and diabetes that put people at greater risk of more severe COVID-19 symptoms. Canada also had the highest pediatric asthma rate amongst countries of comparable income level in a recent review, with nitrogen dioxide from traffic responsible for approximately 1 in 5 new cases of asthma in children. Transitioning from passive transport to active transport modalities saves lives and healthcare-related costs through reduced exposure to traffic-related air pollution and improved physical activity levels. It also enriches community life and relieves depression and anxiety. (Edger, R., Howard, C., Lem, M., Zigby, J., Pétrin-Desrosiers, C., Doyle H.M., Kitching, G.T., Luo, O.D., Cohen, A., Wu, K., Kirsh Carson, J.J., Létourneau S.G., & Kuhl, J. (2020). Healthy Recovery Plan: For a Safe and Sustainable Future. Canadian Association of Physicians for the Environment. https://cape.ca/wp-content/uploads/2020/07/CAPE_Report2020_EN_HealthyRecoveryPlan-1.pdf

In considering COVID-19, the Discussion Paper notes: *“As Ontario recovers from the pandemic, levels of travel are expected to return and demands on the transportation system will continue to grow. We are planning for a transportation system that meets future needs and is resilient in the face of unexpected events.”* Another insight from COVID-19 that relates to transportation is also noted on the Government of Canada website, *“Evidence shows that exposure to air pollution increases susceptibility to respiratory viral infections and pneumonia. This suggests that people exposed to higher levels of air pollution may be at greater risk of becoming ill with COVID-19, with an increase in frequency of the most severe outcomes”* <https://www.canada.ca/en/environment-climate-change/campaigns/canadian-environment-week/clean-air-day/health-impacts-air-pollution.html>. A 2020 study observed a positive association between COVID-19 incidence and long-term PM2.5 exposure in Canadian health regions. (Stieb et al. 2020. An ecological analysis of long-term exposure to PM2.5 and incidence of COVID-19 in Canadian health regions). In light of this evidence, Ontario’s Transportation Plan must acknowledge and address the multiple ways in which transportation emissions impact the health of Ontarians today and in the future.

A Near-road Air Pollution Pilot Study (2015-2017) conducted by the Southern Ontario Centre for Atmospheric Aerosol Research (SOCAAR) at the University of Toronto, in collaboration with Environment and Climate Change Canada, the Ontario Ministry of the Environment, Conservation and Parks, and Metro Vancouver examined traffic-related pollutant concentrations near major roadways to evaluate the potential impacts on Canadians. The report emphasized that “*Canadians need to pay much more attention to air quality near roads.*” Nearly **one-third of Canadians live within 250 metres of a major road and are thus exposed to traffic emissions**. The highest percentages live in Ontario [~ 46%] and British Columbia. The study noted that improvements in pollution management “*have been offset to some degree by the increased number of vehicles, the increased number of kilometers driven, and the increased use of heavier vehicles in urban settings*”; and that “*Highly polluting diesel trucks are making a disproportionate contribution and they represent the major source of key pollutants such as nitrogen oxides and black carbon. Data for these pollutants indicate that excessive exposure to diesel exhaust can occur near roads with a significant proportion of truck traffic.*” <https://www.socaar.utoronto.ca/wp-content/uploads/2019/10/SOCAAR-Near-Road-Air-Pollution-Pilot-Study-Summary-Report-Fall-2019-web-Final.pdf>

The Discussion Paper remarks that travel demand has grown three times faster than new road construction between 2001 and 2015. It also notes that “*a range of solutions are needed, including increasing infrastructure capacity, using our infrastructure wisely, and providing options for people and businesses to choose the most effective way to get around*” (page 2). However, it does not provide a goal for the shift in modal split for passenger travel, nor for reducing travel demand for goods shipment. For example, an overall objective could be to reduce total amount of road travel in private vehicles and for goods movement.

In terms of goods movement, what is lacking in the Plan are efforts to minimize the amount of goods transported and distance goods travel. Also, while there are actions in Section 4 that would support the decarbonisation of the goods transport sector, more will be needed for this to occur in a timely manner.

Near-term actions to “future-proof” the transportation system

OPHA supports the goal “*To prepare for an uncertain future we are working to create a more resilient and environmentally sustainable transportation system.*” However, the Transportation Plan’s proposed near-term actions are missing the goal of reducing greenhouse gas emissions and local air pollution from the transportation sector. The goals must not only address “future ready” but also address existing public health impacts of the transportation sector including exposure to traffic-related air pollution and emissions of greenhouse gases that currently represents 35% of Ontario’s emissions.

The document does not define near-term. OPHA recommends that each action be accompanied with a timeline for completion e.g. 2 to 3 years, 3 to 5 years, etc..

OPHA supports the actions listed under Environmental Impact. However, a clearer goal for greenhouse gas emission reductions, including interim targets, that are in line with the Canadian commitment of net-zero by 2050 is needed. Also needed is a clear commitment to address climate impacts and limit other environmental consequences such as sprawl, traffic-related air pollution and loss of agricultural lands and green space, which are critical to ensuring resilience of region in a warming climate. With respect to Emerging Technologies, these initiatives must clearly commit to giving priority to safety and other potential negative impact (e.g., exposure to traffic-related air pollution, increased congestion, increased sprawl).

OPHA supports the development of a multi-sector Climate Change Impact Assessment and the consideration of transportation systems within the assessment. Identification of sectors to be involved in its development and a timeline for implementation is critical.

In closing, and as noted above, OPHA strongly encourages the Province to include as a priority, addressing the climate crisis, the impact transportation systems have on greenhouse gas emissions, and the opportunities for a sustainable and equitable transportation system that if properly designed and implemented, can be a major component of climate action to help the Province meet its 2030 climate target, improve air quality, improve population health and achieve environmental justice. The vision for mobility should be enhanced to add a 4th pillar: Prioritizing low-carbon, healthy, equitable and climate-resilient transportation systems.

To ensure successful implementation of the transportation plan, OPHA agrees that collaboration among all sectors, all levels of government, indigenous communities and organizations, the general public and businesses is key to achieving a transportation system that is healthy, safe, equitable and sustainable. A healthy transportation system can result in healthy communities, greater health equity, healthy economies and a healthy environment for current and future generations. Implementing this vision starts with prioritizing low-carbon, healthy, equitable and climate-resilient transportation systems.

Thank you for the opportunity to contribute to a Transportation Plan for the Greater Golden Horseshoe.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Walsh', written in a cursive style.

Pegeen Walsh, Executive Director

More about the Ontario Public Health Association

OPHA is a member-based, not-for-profit charitable organization that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including influencing public policy, capacity building, research, and knowledge exchange. Our membership represents many disciplines from across multiple sectors. OPHA is also home to Nutrition Connections (formerly the Nutrition Resource Centre) which advances nutrition knowledge and collaboration.