



August 21, 2020

Impact Assessment Agency of Canada
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Re: Milton Logistics Hub Project Reference Number: 80100

To Members and Staff of the Impact Assessment Agency:

Milton Residents Affected by Intermodal Lines (RAIL) formed in 2001 with the initial proposal for the Intermodal terminal on the east side of the current proposed location. The issue of the CN Logistics hub is serious and complex today and has been since it was first introduced to Halton in 2001.

CN received tremendous public opposition to the project in 2001; CN said it was the most significant public opposition they had ever faced for any project.

Milton RAIL is clear we are not opposed to intermodal and truck transport. We understand the need for the industry; however, it must not come at the cost of any community; it is NOT a NIMBY issue. We must be responsible and recognize that an industrial facility such as an intermodal hub must be in an appropriate location with little to no impact to human health, air, safety, watercourses, and environment – including all wildlife, birds and fish.

An intermodal terminal is not just rail transportation; it relies on truck transportation. This hub will bring 1600 trucks in and out of the facility each day of the year. The proposed location is 10+km from the proposed site. An intermodal facility must be in an industrial-zoned area with the existing infrastructure to support the daily and continuing activities of the yard. The proposed location does not fit those criteria and puts Halton Residents' health and safety at risk.

Our Town and Regional staff work and plan the best community for its residents. Halton has strict land-use planning policies in place to support and maintain planned growth for the future of Halton Residents. The intermodal terminal does not fit within those guidelines. The effects of CN's proposed intermodal rail hub put Halton residents at risk.

Halton accommodates provincially mandated growth in the Region to make Halton a desirable place to live. The intermodal hub does not, as it would bring 1600 truck trips daily to and from the facility adjacent to the growing residential community of Milton. Based on the decision made, the health and safety of Halton residents are now at risk.

Over 500,000 people live in Halton and choose to live here based on their experience in Halton Region, a region developed and evolved through considerable planning to create desirable communities and protect the natural environment; the Niagara Escarpment. Halton is a community shaped through responsible planning and environmental policies designed over years of conversations with the Region. Your decision could take that away and potentially impact future communities as your decision will set a precedent for future projects. The health and safety of Halton residents are not worth risking.

In the previous attempt to build the intermodal, the process was different. At that time, the process required CN to apply to the Canadian Transportation Agency with the final footprint of the project; regardless of the closing date of project completion: be it one year, five years or 30+ years down the road. The process in 2015 has changed, as the first step was the Environmental Assessment.

CN currently owns over 1200 acres, yet the hub plans are for 400 acres. We have asked CN what the plans are for the remaining 800 acres and they will not answer. Why is that? We can't understand how they don't know what they plan to do with the land. CN denies any knowledge, which leads us to have a serious concern and ask more questions. Are they planning to expand the yard further? If so, will they be required to make another application for this development? Does the community need to go through this process again? We need answers, and it seems most unreasonable that CN would build such an involved and significant project and not have considered options for their future. It is reasonable for us to have a concern and expect an answer as well as a guarantee that CN will be held accountable for future impact. We can only speculate how many trucks would be travelling through the community if CN expanded their yard to include an additional 100, 250, 500 or more, what if they fully expand to use the 1200 acres. In future, are we looking at 4,800 trucks or more in and out each day? Any increase will dramatically change the impact on the environment and human health. We already know the current adverse impacts are determined unsafe. Expansion of the site would increase the effects on health, traffic, safety and the environment.

The Federal Environmental Review Panel reviewed and concluded that CN's Intermodal Hub activity would increase the exposure of Halton residents to their pollutants. Pollutants determined unsafe at any level of exposure creating significant effects on air quality and human health.

The IAAC is aware that with more than 100 panel reviews done over the past 47 years no Panel has ever made a finding of significant adverse effects on human health. If this project moves forward, a precedent will set showing that human health is less important than industrial development. We feel our community and our society are smarter than that; we recognize the value in our natural environment, all wildlife and all human health. No federal decision-maker ever concluded that significant adverse effects on human health are justified. This project cannot move forward. This CN Logistic Hub is unquestionably the wrong location.

The Panel also identified six potentially significant adverse effects on human and environmental health as well as a risk for at least 16 additional potentially harmful effects, including the impact of noise on residential communities. The project will have negative impacts on traffic congestion and Regional road infrastructure from 1,600 truck trips daily to and from the proposed location. Recognizing all these impacts, the Panel recommended over 200 measures to mitigate impacts on the community. Where do we draw the line?

The problem is the federal government cannot enforce many of these mitigation measures. If CN does not implement these mitigation measures, the adverse effects on environmental and human health could be far worse than predicted by the Panel. This project must not be approved. We know better, we must do better.

We understand there are alternative locations, communities who are looking to have an intermodal site developed. CN must be accountable and must be required to explore those options.

Approving this project would send the message that the health and safety of Halton residents are worth risking. We say nothing could be further from the truth. Our environment, our community, our Residents are worth protecting. The CN Intermodal Hub must not come at the sacrifice of any community. Refuse the approval of CN's proposal.

Sincerely,

<Original signed by>

Rita Vogel Post
Milton Residents Affected by Intermodal Lines (RAIL)