



July 26, 2017

Gerry Hamblin
Project Assessment Manager
Environmental Assessment Office
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Dear Mr. Hamblin,

Subject: Pattullo Bridge EA – Valued Components (Five Pillars)

Transport Action BC wishes to comment on the Valued Components being established for the Environmental Assessment Process of the Pattullo Bridge Replacement project. As advocates for sustainable modes of transportation, we recognize the value of balanced transportation choices favouring environmentally and community friendly modes, while reducing our current dependence on single occupant vehicles (SOV) and port-to-port trans-shipping on local roads via truck. This shift away from over-dependence on road-based transportation towards a diversity of transportation options - including reducing the need to travel in the first place through progressive land use policies - is widely seen as the only way we will get a handle on the intractable congestion in our urban region, while maintaining quality of life and a vibrant economy^{1 2}. Indeed, in recognition of the need to promote mode shift, cities in the region are now adopting "no traffic growth" policies and encouraging the mobility of a growing population through other transportation options.

We do not think the proposed 5 pillars of the EA process adequately recognize the importance and value of a balanced transportation system for urban Metro Vancouver. The process, as currently formulated, cannot evaluate whether this project will promote our region's evolution towards sustainable transportation networks, or whether it will further contribute to the dominance of motor vehicles and all the associated health, congestion, economic, affordability, and land use problems.

The bridge under consideration is an extremely expensive infrastructure project. It is primarily intended to serve cars and trucks, in a corridor which has many options and diverse potential for moving people and goods; namely: transit, rail, and river

¹ <https://www.toolkit.bc.ca/planning-balanced-transport-system>

² <http://www.vtppi.org/tca/tca0509.pdf>

barge (we recognize that the project proposes new facilities for cyclists and pedestrians, but we do not expect these new facilities to significantly impact the current boundless demand for vehicle use on the new bridge). The willingness of the proponent to spend such a large sum of money on vehicle infrastructure, particularly one which has the potential to greatly increase the capacity for car and truck volumes, raises concerns about the impact of the proposed facility on the balance of traffic and transportation investments in our urban region.

According to the Mayors' Vision, the bridge is proposed to be built to 4 lanes (existing capacity) with the potential to expand to 6 lanes in the future. In their vision, the project is to be funded primarily by user pricing. User pricing also serves as a mechanism for transportation demand management (TDM). To date all of the communication and planning for this project has been based on this vision. The existence of TDM measures, in conjunction with other transportation investments and progressive land use changes, could preclude the need to ever expand the bridge beyond its existing 4 lanes. However, a recent change in Provincial policy has meant that tolls will come off the bridges in our region. This will drive a very different outcome for this project from the one which the Mayors have been promoting.

The removal of tolls creates a fiscal problem for the proponent (TransLink) and has the potential to impact the provision of transit services and investments throughout the region³. The lack of explicit TDM mechanisms (tolls) will result in induced demand for use of the new facility⁴, and will quickly result in calls for expansion to 6 lanes (as was seen with the Alex Fraser Bridge). This has the potential to rapidly overwhelm the local road network, which is already beyond capacity during much of the day.

There is huge value in a balanced transportation network for Metro Vancouver - one where goods are moved not only by truck, and people commute not only in SOVs. Therefore, we believe that the EA process must look at the following:

- How will the shift from user funding (tolls) to undefined regional funding impact the financial viability of transit services throughout the region?
- What is the potential for the new facility (under both 4 and 6 lane scenarios) to induce vehicle travel demand, thereby exacerbating congestion in areas beyond the project study area? This should be evaluated for both near and

³ <http://vancouver.sun.com/news/local-news/how-will-toll-removal-affect-port-mann-and-golden-ears-bridges>

⁴

https://www.researchgate.net/publication/23526399_Relationships_between_highway_capacity_and_induced_vehicle_travel

long term and consider the local network's ability to absorb more traffic. In absence of tolls, what other TDM measures could be applied?

- How does such a large investment - with the potential to service expanded car and truck movements - influence our region's ability to move toward a more sustainable and diverse transportation system?
- How could an expanded, non-tolled facility impact viability of other nearby transportation investments such as Surrey LRT, Evergreen Line, or service improvements for SkyTrain/SkyBridge? Will it discourage people from using these effectively tolled systems? Will it discourage private investment in short sea shipping and local rail improvements, and hence encourage more trucks on our roads throughout the region? Will it encourage the Port of Metro Vancouver and trans-shipping companies to be overly dependent on public investments and locally supported infrastructure for their international operations?
- Should the proponent consider a smaller 4 lane only option, with no possibility for expansion to 6 lanes, as a means to mitigate the financial risk and overall costs, while recognizing and supporting the evolution towards transportation diversity in our urban region?
- Will trends in transportation (i.e. driverless cars, car sharing, telecommuting, etc) and land use (greater mixed use development, densification) allow for a lower-traffic-volume solution to be implemented?

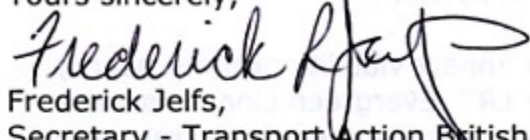
These studies should consider both the direct impact of this project as well as its contribution to the general expansion of roads in our region, including whether the cumulative investments have any long term benefit for the movement of goods and people. We draw your attention to other metropolitan regions such as Seattle and Toronto, which have failed to deal with their congestion problems despite massive investments, primarily in road infrastructure, and have created even bigger problems for the movement of goods and people in those regions. We submit that the unique geographic constraints of Metro Vancouver make our region even more vulnerable to poorly considered transportation investments.

In conclusion we believe there is great value for our region to build towards a more sustainable - diverse, robust, environmental, affordable - transportation system. This is critical if we are to maintain a healthy economy, clean environment, safe and livable communities and tolerable congestion in our increasingly urban and densifying region. We do not think the proposed 5 pillars of the EA process adequately represent this value, and hence miss the opportunity to evaluate how this project could enhance or detract from the evolution of our region's transportation networks towards greater balance and sustainability. We encourage the EA team to recognize the challenges and opportunities of building new

transportation infrastructure in an urban setting and the impacts such infrastructure can have on how the transportation system evolves.

Thank you for the opportunity to participate in this public consultation process.

Yours sincerely,



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Transport Action BC is an advocacy group that promotes the use of sustainable transportation. We are affiliated with Transport Action Canada, a national federation of consumers devoted to the public interest in transportation systems.