

**Comments on:
"North American Trade and Transportation Corridors: Environmental Impacts and Mitigation Strategies" paper**

From:

Mark S. Winfield, Ph.D.
Special Advisor
Pembina Institute for Appropriate Development
Suite 505
124 O'Connor St.
Ottawa, Ontario
K1P 5M9
Phone: (613)-235-6288 (ext.25)
Fax: (613)-235-8118
markw@pembina.org
<http://www.pembina.org>

The paper provides a good overview of the issue. I have a few general comments on it.

I wonder if the paper is being a little overoptimistic in its assumptions re: emission reductions as a result of reductions in the sulphur content of diesel fuel and fuel switching in the trucking industry. In light of the change in administration in the US these may no longer be safe assumptions. It would be good to see emission projections without these types of assumptions re: the implementation of new requirements for mobile diesel sources.

I think the paper underestimates scope of the environmental impacts of the transportation corridor phenomena. This seems to be particularly true in the case of the Detroit-Toronto corridor, which is the one I am most familiar with. The trade related demand for highway capacity has been a major factor in the Ontario government's recent announcements for an enormous expansion of highway capacity in the Corridor (including the Niagara Mid-peninsula corridor, expansions of highways 401, 407 and 7 and a new highway north of the 407 passing north of the Greater Toronto Area). Highway expansions already underway in Southern Ontario are facilitating further urban sprawl, and further investments are likely to exacerbate this problem by appearing to make greater commuting distances feasible, and encouraging new developments further and further away from existing urban cores. This process has implications for air quality, climate change, land-use and infrastructure costs well beyond those associated with the new highway capacity per se.

The paper seems to assume that one of the solutions is larger and longer trucks. Presumably this carries with it some potentially significant costs in terms of safety and infrastructure maintenance costs which should be recognized within the paper.

In general the paper seems to assume that the increase in long-distance movement of freight in North America is inevitable and that nothing can be done to address this basic direction. As a result, its proposed responses tend to be rather weak, addressing the symptoms of this increased traffic, rather than considering the possibility of ways of dealing with its causes. Does increased trade necessarily require increased long-distance transportation of goods, particularly in the information age? Are there ways in which such transportation, and its associated direct and indirect environmental and infrastructure costs, can be discouraged, or to encourage shifts to less costly modes (e.g. full cost pricing of commercial road use including infrastructure capital and depreciation costs)? One possibility might be to take a wider comparative perspective in the paper, as I understand that some European governments have taken much more aggressive approaches to promoting modal shifts away from trucks.

These comments aside I think the paper is a good start on an important issue.