

Balancing on a house of cards

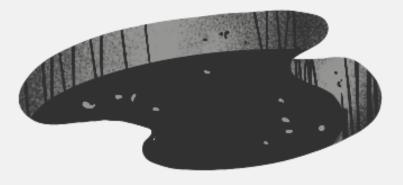
We can all agree that Route 90 is in terrible shape. It needs a fix, not a widening.

As the City of Winnipeg has recognized in its many Master Plans, from OurWinnipeg 2045, Complete Communities, the Transportation Master Plan and the Community Energy Investment Roadmap, we need to reduce our dependence on driving alone to achieve sustainability, both financially and environmentally.

Yet, the current plan for Kenaston has the city spending hundreds of millions of dollars to create a short stretch of roadway—next to a major new development—that is hostile to anyone traveling outside of a vehicle. Those inside motor vehicles will be inconvenienced by increased travel times due to more traffic lights. The increased speed and slip-lanes will mean those traveling on foot or by bike will be regularly placed in conflict zones. The simple task of taking the bus to shop at Superstore will involve crossing over twenty lanes of traffic to get to and from a bus stop. Once on the bus, no space has been dedicated to transit, and therefore buses will be stuck in the same congestion that they are today.

There are many reasons for the public, media and other levels of government to scrutinize the proposed widening from the City of Winnipeg. Below, various members of the Transportation and Land Use Coalition have dug into the reports and highlighted issues under several topics. You will also find questions that must be answered to justify this incredible expense.





TRANSIT

By Kyle Owens, Functional Transit Winnipeg

The proposal for Kenaston does not address the induced demand from road widening and does not encourage a mode shift to transit. Instead it uses a narrative of offering choice by adding bus lanes and bike lanes as well as additional vehicle lanes. The reality of the current design is that the bike lane will be underused next to so much fast traffic, and those on the bus will be stuck in the inevitable traffic congestion. This approach is not in keeping with the reality of climate change and the need for transportation mode shift.

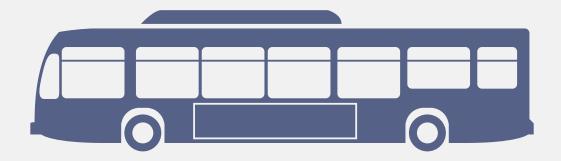
Plus, the projected transit plans for Kenaston envisioned in 45 years does not move many vehicles off the road. In the short term, the 74 Bus remains a connector line, with service every 10 to 15 minutes. Not until 2045 does the transit plan transition Kenaston to a rapid line with buses every 5 to 10 minutes. Connector services into the neighbourhood are going to remain every 15 to 30 or even 15 to 60 minutes. It is clear that transit is not the priority or vision for the infrastructure project.

Naawi-Oodena is a significant project for the Treaty One First Nations and the City of Winnipeg. The master plan envisions a mixed-use community that integrates residential, commercial, and cultural spaces. A key component of this development is the establishment of effective transit solutions to ensure accessibility and connectivity. The successful integration of transit solutions is crucial for the Naawi-Oodena development. By focusing on connectivity, active transportation, and collaboration between stakeholders, the project aims to create a sustainable and accessible community for all.

Before additional housing goes in along Kenaston, both at Naawi-Oodena as well as in Seasons of Tuxedo, we should have frequent or rapid transit to ensure the new housing doesn't mean more car trips.

Question:

If we envision more people traveling along Kenaston in the future, why are we not providing frequent or rapid transit to enable these trips to be made without the need for more personal vehicles?



MODE SHIFT

By Mark Cohoe, Bike Winnipeg; and Mel Marginet, Green Action Centre

The City of Winnipeg's Transportation Master Plan and Climate Action Plan indicate that we need to reduce our drive-alone mode share to 50% to meet our goals. Winnipeg's current driving mode share is about 80%.

It's become clear, based on surveys in Winnipeg and similar cities, that Winnipeggers are driving not because it's their ideal travel mode, but because they believe they have "no choice" but to drive based on the lack of convenient, comfortable options. Green Action Centre summarized these numbers in 2023. The City of Winnipeg should look at Transportation Demand Management (TDM) strategies instead of road widenings, as TDM is more affordable and offers more transportation choice to residents.

TDM is defined as the application of strategies and policies to increase the efficiency of transportation systems, that reduce travel demand, or to redistribute this demand in space or in time. To date, the City of Winnipeg has done very little work in areas of TDM. Instead, we have overbuilt our car infrastructure to accommodate peak travel times. The result is that we can never build enough infrastructure to meet that induced demand. Outside of peak travel times, we leave a hostile environment for everyone outside of the personal vehicle (barren parking lots, wide roads that encourage speeding, long walks between destinations, etc).

Riley Black examined this quandary in his report for the CCPA, titled <u>The High Cost of Free-Riding</u> <u>and How We Fix It</u>. In this paper, Mr. Black notes:

- The financial burden for this road infrastructure is born by Winnipeg taxpayers for the benefit of those who live outside of city limits.
- The average household income is far lower in Winnipeg (\$68,402) vs metropolitan communities (\$86,912 in St. Clements, \$130,534 in East St. Paul, for example).
- Those living in exurban communities have a lower property tax rate than those within the City of Winnipeg.

This begs the question: why should Winnipeg taxpayers pay for infrastructure that only encourages people to live further away (outside the tax base) and drive in?



The High Cost of Free-Riding and How We Fix It presents a compelling case for the need to bring a commuter fee to Winnipeg. Commuter fees are a critical tool in the toolbelt of Transportation Demand Management.

Instead of spending hundreds of millions of dollars to widen Kenaston (and don't forget about the increased annual operating expenses for the new infrastructure), we should instead be investing in the infrastructure that encourages more healthy, sustainable trips. Better transit, safe neighbourhood streets, connected walking and biking networks, and ride sharing. Aside from these 'carrots' to encourage sustainable travel, Winnipeg—like other cities across North America—needs to study what tools to use to discourage those who work and regularly use Winnipeg services, from living outside of the Winnipeg region. A commuter fee for vehicles driving into and out of the city multiple times a week is a good tool to discourage driving while raising funds to further improve Winnipeg's transportation system.



SOCIAL EQUITY

By Richard Milgrom, Head of Planning, University of Manitoba; and Marianne Cerilli, Change Agent

There are also problems with the social equity and just transition impact with the investment into widening Kenaston, adding up to ten lanes at Academy.

More investment and subsidy of car reliance and use penalizes those who use transit, mostly people living on lower incomes. The average cost of owning and driving a car in Winnipeg at 20,000km per year, is \$1,793 per month or about \$21,516 annually. The costs include insurance, fuel, maintenance and repairs, as well as depreciation, financing costs, administrative fees and parking. This cost is out of reach for almost 50% of the population given, according to the City of Winnipeg data from the economic, demographic and fiscal outlook, the lowest 40%, or bottom two quintiles of earners in Winnipeg, are:

- Lowest Quintile (0% 20%): Up to approximately \$32,000
- Second Quintile (20% 40%): Approximately \$32,001 to \$48,000

Winnipeggers in the middle quintile of \$48,000 to \$64,000 per year put a lot of income into a vehicle that is parked most of the time.

The cost for transit annually in Winnipeg is \$693 for a low income WINNpass and about \$1,385 annually for a regular adult price.

The City of Winnipeg, until 2016, had a 50-50 cost share with the provincial government to ensure that the benefits of transit were supported. This transit cost sharing arrangement has not been reinstated yet by the new provincial government.

Transit routinely faces increased fares and fewer subsidies, compared to the hidden subsidies for personal vehicles. Transit fares have increased from \$1.25 in the late '90s to \$3.25 for a regular adult fare in 2025. This is a 160% increase.



Some of the ways personal vehicles enjoy hidden subsidies include:

- · road infrastructure costs from general revenue, not tolls or personal fees,
- snow clearing and sanding,
- free parking on public land,
- low density suburban development that is car centric requiring expensive infrastructure,
- and a loss of revenue from land that could be used for tax generating development.

Other costs not paid by drivers include:

- environmental costs from pollution,
- · storm water drainage challenge with more concrete roads,
- · health costs from collisions,
- sedentary life-style of car reliance,
- fossil fuel subsidies and lack of carbon pricing,
- tax breaks for vehicles and ability to claim mileage,
- and policing and law enforcement related to traffic and road safety.

These subsidies are often hidden because they're integrated into general municipal, provincial, or federal budgets, and they obscure the true costs of car dependency. Addressing these hidden subsidies would involve greater reliance on user fees (e.g., tolls, congestion pricing, parking fees) and redirecting funds toward sustainable transportation infrastructure.

Other disparities related to the Kenaston road widening project are related to the comparative condition of the St. James bridge, which services wealthier areas like River Heights and Tuxedo, compared to the Arlington Bridge, which services the lower income North End.

Scott McCullough, a Research Associate and Assistant Director at the Institute of Urban Studies at the University of Winnipeg, has extensively examined urban development issues, including the allocation of infrastructure spending. In many municipalities, including Winnipeg, there is a notable emphasis on funding "hard" infrastructure projects such as roads and sewer systems. For instance, the City of Winnipeg's 2024 Infrastructure Plan outlines significant investments in combined sewer districts, focusing on construction projects across all 43 combined sewer areas.



This prioritization often comes at the expense of "soft" infrastructure, including community centers, recreational facilities, and social programs. Investments in soft infrastructure are crucial for fostering community engagement, promoting social cohesion, and enhancing residents' quality of life. The disparity in funding allocation can be attributed to several factors:

- <u>Economic Impact</u>: Hard infrastructure projects are often perceived as immediate drivers of economic growth, providing jobs and stimulating related industries.
- <u>Maintenance Necessities</u>: Essential services like water treatment and sewage management require ongoing investment to meet health and safety standards.
- <u>Quantifiable Benefits</u>: The benefits of hard infrastructure are more easily measured, making it simpler to justify expenditures.

However, underfunding soft infrastructure can lead to long-term social challenges, including reduced community engagement, increased crime rates, and deteriorating public health. Advocates like McCullough suggest that a more balanced approach to infrastructure spending, which includes adequate funding for community centers and social programs, can lead to more sustainable and equitable urban development.

For a comprehensive understanding of Winnipeg's infrastructure spending priorities and their implications, reviewing the city's official infrastructure plans and consulting studies from urban research institutions is recommended.

When considering the Kenaston widening from a social equity perspective it positions allowing those who can afford cars to get around faster as more important than those who cannot afford cars to access food and shelter. The Kenaston widening will make Winnipeg a more inequitable city.

- If the city wasn't able to increase the \$100K annual maintenance budget for Kenaston for more than two decades (from 1999 until 2023), where is the additional operational, maintenance and repair funding for the widened road and new bridge span coming from in the operating budget?
- Why are we adding a new span to the St. James Bridge for South Winnipeg when the Arlington Bridge has been effectively abandoned and the Redwood and Louise bridge are at the end of their life?



FINANCES & THE ECONOMY

By Michel Durand-Wood, author of You'll Pay for This and editor of The City Project

About the Benefit-Cost Analysis produced by the City:

The report shows the net benefits of the widening portion of the project only (ie. it excludes the costs and benefits of the sewer work, as well as the road renewal, both projects that need doing anyway), and it calculates that widening Kenaston to three lanes in each direction would provide a net present value of \$20.5 million in benefits over the next 30 years, for a benefit-cost ratio of 1.17.

However, as the report indicates, that's excluding admin and contingency costs. When those are included, the widening has a net present value of negative \$1.9 million and a benefit-cost ratio of less than 1.

But that's not the end of it. A total of \$57.8 million, or 41%, of the benefits of the widening are attributed to the fact that building from two to three lanes allows traffic to be maintained in two lanes per direction during construction, instead of one. The report points out that this is only a temporary benefit, and if excluded, the "long-term benefits are below total costs."

Further, the \$12.6 million in environmental benefits due to reduced fuel consumption doesn't consider the greenhouse gas emissions caused by its construction, which the report itself estimates to be 28,067 tonnes. Including the cost of those front-end emissions means the environmental benefits of the fuel savings are completely erased by the environmental costs of constructing the widening.

The report also claims \$4.4 million in safety benefits, since the "proposed design includes several interventions expected to impact safety performance" compared to the existing two-lane layout. But the City doesn't need to rebuild using the existing layout. It could also include safety interventions in a new two-lane design during street renewal (which, by the way, should be standard practice). These are therefore benefits of street renewal, not of the road widening.



About "The Economy":

Kenaston is often touted as a "critical trade corridor" for the movement of goods, products and services, and key to the vitality of our local economy. Without it, we'd all end up "naked and hungry", in the words of David Linton of the Manitoba Trucking Association. After all, the trucking industry directly and indirectly contributes more than \$2 billion to Manitoba's GDP annually, while moving over \$20 billion dollars of freight in and out of Winnipeg every year, according to the Manitoba Trucking Association.

However, it turns out only 4% of traffic on Kenaston is truck traffic, according to the City's own data. That means, of the combined \$140.0 million for all benefits over the next 30 years that are projected for the widening in the Benefit-Cost Analysis, the weighted share to the trucking industry of those benefits comes to less than \$450,000 per year. For a \$2 billion a year industry, those benefits would need to be multiplied ten- or a hundred-fold before they'd even qualify as a rounding error. Furthermore, the Benefit-Cost Analysis stated the widening of Kenaston would provide an internal rate of return of 1.4%, which is much lower than even a savings account can provide these days.

The City's latest bond issue had it paying 4.65% interest on its borrowed money. Borrowing money at 4.65% to invest it at 1.4% is guaranteed to make the City poorer in the future, leading to more forced service cuts, deferred maintenance and tax increases. But it's actually much worse than that, even. Because when a private citizen invests money at a rate that doesn't cover their cost of capital, they suffer the financial consequences themselves, usually without impacting anyone else. But when a level of government like a city does it, not only are the effects felt in that city's own finances, there are also knock-on effects in the wider economy, because they are diverting huge sums of limited capital away from more productive uses. That means when a city invests money in a project that returns less than its cost of capital, it acts as an overall drag on the economy. So, far from providing a much-needed boost to the local economy, the Kenaston widening will actually be a net drain on our economy.

Taking all this together, there is very clearly no economic case for widening Kenaston. In fact, the case is very strong against widening it.

- With the money spent for building Centre Port Canada Way and to improve the perimeter highway, we are seeing fewer and fewer trucks using Kenaston (currently just 4%). What justifies it as a "critical trade corridor"?
- With investments in other modes of transport having a higher net benefit than personal vehicles, why are we spending so much to widen Kenaston for the benefit of personal vehicles?
- The strategic plan for the Naawi-Oodena project indicates that they see frequent or rapid transit access as preferable. Why has the city not looked at frequent or rapid transit, and its much higher net benefit, to compare which project is better long-term?

PUBLIC ENGAGEMENT

& Political Process: Ignoring Principles, Manufacturing Consent

By Marianne Cerilli

The <u>Engage Winnipeg Policy</u> requires the City of Winnipeg to follow key principles in engaging the public and stakeholders for major projects. These range from offering 'meaningful engagement opportunities for citizens' to ensuring 'transparency and accountability'.

A <u>recent review</u> to amend the *Policy* has revealed numerous deficiencies where it is failing to achieve its stated goals. These gaps and flaws have repeatedly plagued the public consultation process for the proposed reconstruction and widening of Route 90 – an alarming number of the *Policy's* principles have either been ignored or poorly executed. Here are just three of many examples:

1. Lack of Meaningful Engagement With Those Most Impacted

The City of Winnipeg has done an inconsistent and frequently poor job of keeping those most affected by the proposed widening Route 90 – private property owners of homes along or in close proximity to Kenaston and the St. James Bridge – informed about the project and their opportunity to provide feedback to Council and the Project Team.

This is part of a wider systemic problem. Most Winnipeggers do not feel they have a role or input in City decision-making. The proportion of citizens who 'Believe that I can influence the decisions or direction of the City of The City of Winnipeg' has trended downward from 52% in 2020 to 40% in 2023.

A prime example of a lack of meaningful engagement with those most affected by the Proposed widening of Route 90 is the Project Advisory Committee (PAC) that began meeting in January 2018. Despite a commitment to 'listening to all perspectives', membership of the PAC excluded area residents directly impacted along this corridor yet included special interest groups such as the Manitoba Trucking Association.

Since Summer 2018, the City of Winnipeg appears to have abandoned the use of a local PAC. It is difficult to imagine any other major capital project in Winnipeg that has excluded residents directly affected in this manner.

2. Failure to Provide Timely Notifications and Adequate Period for Review

There unfortunately are too many examples where the City of Winnipeg releases reports and their associated materials without sufficient notice for the public to properly review and respond. This fundamentally undemocratic process is again being demonstrated with the Administration to approve the 'Preliminary Design Study – Route 90 Improvements' – see here.

The proposed reconstruction of Route 90, including widening Kenaston from Academy to Taylor Avenue and adding a third span to the St. James Bridge, is one of the most expensive transportation projects in Winnipeg's history (\$586.1-million capital cost plus \$150.6 million of interest). It is only reasonable to expect that citizens and experts from the community be given sufficient time to review and seek answers to questions about any new information released by the City regarding the costs and benefits of this project along with other impacts such as safety and noise.

The reality is that the Administration chose to release an updated benefit-cost analysis of the project with only one week before the first critical step in the approval process (i.e., June 11, 2024 meeting of the Standing Policy Committee on Public Works). This lack of adequate time to review and critique this analysis not only violates the City of Winnipeg's principle of meaningful consultation, it also sets a dangerous precedent for future major capital projects. Also disturbing is that citizens who subscribed for project updates were not notified of the new reports and information released by the Administration, nor the opportunity to appear in delegation before the Standing Policy Committee on Public Works to express their concerns.

3. Lack of Transparency, Eroding Trust

The City of Winnipeg has been less than transparent in releasing information about the Route 90 Expansion Project forcing area residents to resort to filing multiple Freedom of Information Requests.

For example, appendix material for the Administration's report to the Standing Policy Committee on Public Works noted above, makes brief reference to an 'independent road safety audit' and a 'noise investigation' – both critical issues for communities along Route 90. However, neither study is appended to the Administration's report nor listed under 'Documents' or 'Important Links' on the Project's Engage Winnipeg home-page. How can citizens be expected to provide meaningful feedback without access to this and other important information, especially when given only one week to reply?

Past Freedom of Information Requests have revealed many examples of questionable claims, incorrect information and overly optimistic projections by the Administration that have eroded public confidence. For example, the City of Winnipeg's Fall 2017 application to the National Trades Corridor Fund to support widening of Route 90 claimed that "Traffic volumes are projected to increase 75% by the year 2030" but that statement does not match a recent <u>Traffic Flow Map</u>. The City's new benefit-cost analysis is based on new traffic projections whose basic assumptions, such as mode shift from single occupant vehicles to vehicle passenger, transit, cycling or walking, haven't been fully disclosed. This makes it impossible for the public and community experts to assess whether the City's projections (and hence the benefit-cost analysis) are reasonable or flawed yet again.

- Why did the city abandon the Project Advisory Committee?
- Why has the full report and appendixes not been released?

ENVIRONMENT & INDUCED DEMAND

By Mel Marginet, Green Action Centre

The city's Benefit-Cost Analysis claims 9% of the benefits of the Route 90 Expansion project (or \$12.5M) are Environmental Benefits.

- "the reduction in fuel consumption is expected to result in a reduction in CO, CHa4, and N>O emissions over 25 years."
- "Using data from Statistics Canada's Infrastructure Economic Accounts (Environmental Perspective) it is estimated that 0.2492 tonnes of greenhouse gasses are emitted for every \$1,000 invested in highway and road structures in Manitoba." Assuming \$112 million in hard construction costs for the three-lane scenario in the Route 90 study area, it is estimated that constructing the third lane in both directions will generate 28,067 tonnes of greenhouse gases."

The BCA uses emissions saved from idling as a benefit, but it doesn't use the emissions created to build the road widening as a cost.

The BCA also doesn't consider updated technology. Vehicles that don't idle when stopped, and more EVs, are not factored into the report.

Induced Demand in the BCA:

- "While an improved facility may induce additional traffic, this additional traffic would likely be traveling to and from the same origin and destination, just using alternative routes that are presumably less efficient than the improved facility to varying degrees. Therefore, despite increased users in a three-lane scenario from induced demand, those induced users are also enjoying a proportion of the improved travel speeds and reduced emissions via reduced fuel consumption."
- While the BCA does reference induced demand, it defines it as people who were already going to make the trip anyway, and now they're going down Kenaston instead of another route, like Pembina for example. This has been the rationale behind why municipalities need to widen highways, and why some believe that it'll solve our congestion problems: we have a fixed amount of people moving, and if we open up this additional space, the vehicles will spread out among the new space and, voila, congestion is solved!



The reality is induced demand involves not just those folks who were using other routes, but it also attracts:

- Latent demand: folks who haven't been making the trip, but they will under the right conditions.
- Off peak: folks who had been making the trip, but outside of peak times to avoid the traffic.
- Other modes: people will choose to travel via other modes to avoid being stuck in traffic.
 For example, folks who are currently traveling N-S on the Blue line (park and rides etc) will go back to driving if that becomes more convenient.

In sum, expanding Kenaston is bad for the environment. The pollution created to build the expansion, and the increase in traffic it will attract, will easily overwhelm any short-term GHG savings. Sightline Institute's report Widening Roads Leads To More Greenhouse Gas Emissions found "each extra lane-mile built will increase emissions of carbon-dioxide, the main greenhouse gas, by more than 100,000 tons over 50 years."

- Why is the City of Winnipeg ignoring key factors of induced demand to this project?
- Why are we not considering the environmental cost of widening to this report?



LONG-TERM MAINTENANCE

By Michel Durand-Wood, author of You'll Pay For This

- According to a report from the City's asset managers, "up-front capital investment [...] only accounts for approximately 20-25% of the lifecycle cost of owning and operating an asset".
- If the widening costs are \$250 million to build today, where is the City going to find the additional \$1 Billion it will need to operate and maintain it over the rest of its lifecycle? This never seems to be an aspect that is considered in Winnipeg when the City builds infrastructure. This is what has led to our ballooning infrastructure deficit, pothole-riddled roads, and, more recently, the closure of bridges, pools and community centres.
- In Toronto, they've recently pegged their 10-year infrastructure deficit at \$26 Billion. That's over 1.5 times the size of their annual operating budget, and 6% of their city's 2020 GDP.
 Toronto Mayor Olivia Chow said the numbers are so staggering that the city needs to think twice about building anything new, and that "we're going to really fix what we have first."
- But here in Winnipeg, with our \$8 Billion infrastructure deficit, at over 3.6 times the size of our annual operating budget, and nearly 18% of the city's 2020 GDP, we're still planning to spend a quarter of a billion dollars to expand a road that will provide far fewer benefits than it will cost. All while closing pools and bridges we already can't afford to maintain. Expanding our infrastructure with a money-losing, economy-killing investment when we can't maintain our existing infrastructure is financially reckless.

Question:

• Why do we not consider long-term maintenance and eventual replacement costs when we make infrastructure decisions?



HEALTH EFFECTS of Proximity to Roadways

By Ann Loewen MD

Roads and the vehicles that use them are important for transportation, the economy and for enjoyment of life. There is also a burden of disease from car, truck and bus emissions that needs to be balanced against those positive features. Along with their well-known greenhouse gas contributions, gas and diesel engines also produce nitrogen oxides (NOx) and very small particulate matter (PM2.5). Some illnesses are more common the closer a person lives to a major roadway because of the amount of exposure to NOx and PM2.5s.

Examples of those health consequences:

- Lung cancer incidence increases with NOx exposure, especially among those who have never smoked cigarettes. (1)
- Dementia risk in people living within 1 kilometer of a major roadway is increased by 13%. It is estimated that overall, 10% of dementia is attributed to vehicle emissions. (2)
- There are indicators that NOx and its related air quality indicators may have been implicated in the spread and harms of COVID-19 during the pandemic years (3), an association that continues to be investigated (4).

Many organizations monitor, promote awareness and advocate for legislation of these harms from vehicle pollutants (5). Unfortunately, despite regulations there are many vehicles in use that exceed allowable exhaust emissions and contribute to the problem of roadway health hazards. Roads and residential areas both need their space, as well as space between them.

- Roadway Environments: A study examining child pedestrian and cyclist injuries across Canadian
 cities found that higher local road density, typically associated with two-lane I residential
 streets, was linked to lower collision rates. Conversely, higher intersection density was
 associated with increased collision rates.
- <u>pmc.ncbi.nlm.nih.gov</u> This suggests that areas with more interconnected local roads may offer safer environments for pedestrians compared to areas with numerous intersections.

While direct comparisons between multi-lane corridors and two-lane streets are scarce, these findings imply that street design, intersection frequency, and road type significantly impact pedestrian safety. Generally, areas with fewer intersections and lower traffic volumes, often characteristic of two-lane streets, may present reduced risks for pedestrians compared to multi-lane corridors with higher traffic volumes and more complex intersection configurations

- Considering the link between air pollution and health, will the city consider including an evaluation of health outcomes as part of infrastructure reports?
- With the increased knowledge about the connection between emissions and increased rates of cancer and dementia, should we be creating a large, congested roadway next to a dense housing development?





Winnipeg, and other cities across North America, have been expanding highways for decades on a quest for reduced congestion and financial prosperity. The reality is that cities are now facing incredible infrastructure deficits and continued liabilities from having an unsustainable amount of infrastructure. Induced demand from road expansions has proven that highway expansions are a losing bet. At the same time as large sums of money are spent on infrastructure to primarily serve personal vehicles, competing priorities with much higher returns on investment too often suffer underfunding and cuts.

In conclusion, reconstructing Kenaston and rehabilitating the St. James Bridge should not be used to justify an expensive, uneconomic and unsustainable widening of Kenaston and adding a third span to the St. James Bridge that, even the Administration admits, will result in "ongoing time savings that are marginal or exaggerated and non-existent' and has a negative benefit-cost analysis when mitigated construction delays during two construction seasons are excluded.

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