

# **There Is No Apparent Evidence of Gridlock to Justify Spending \$50 Billion to \$90 Billion (est.) on a Tunnel Under Highway 401 in the Greater Toronto Area (GTA)**

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**June 2025**

## A. Background and Foreground

The research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

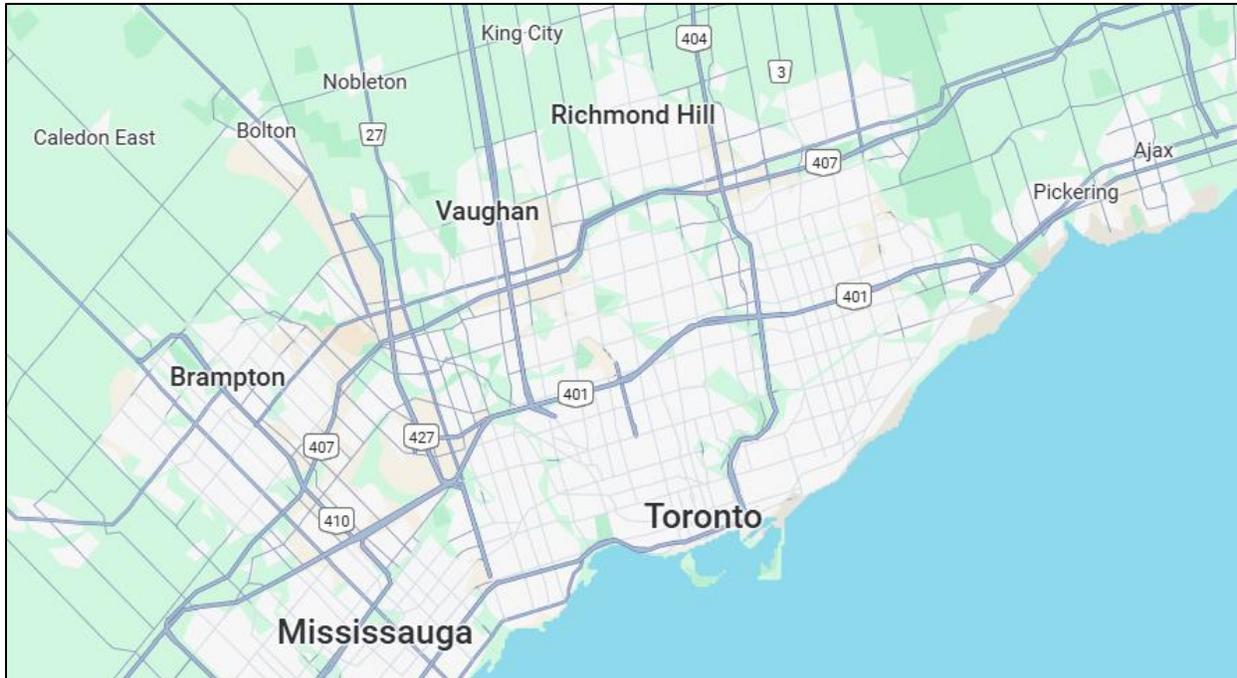
has four background components.

First, gridlock has been identified by Doug Ford's Conservative government in recent years as the reason for funding road network expansions in different parts of Ontario, and in arguing for the removal of bike lanes in the City of Toronto.

In addition, and as discussed in this case study, media stories contain claims by Premier Doug Ford that it is necessary to construct a tunnel under 401 because of gridlock.

The map in Figure 1 locates Highway 401 as it crosses between the eastern and western borders of the Greater Toronto Area.

**Figure 1. Location Map of Highway 401 Crossing the Greater Toronto Area (GTA)**



More on this topic in Section B.

Second, the start year for this case study is 1972, which is when I first became involved in Province of Ontario transportation policy, program, and planning files.

In Section C the report discusses findings about precedent references to gridlock in provincial documentation from 1972 until the Ford-led Conservatives took office in 2018.

Third, over the past 15 years Wellar Consulting Inc./Information Research Board published a dozen reports on the topic of gridlock. The summary finding is that there has never been a gridlock incident in the history of Canada.

Those reports provide a context for examining the \$50 billion to \$90 billion (est.) proposal by Ontario Premier Doug Ford to construct a tunnel through the Metropolitan Toronto Area (GTA) to relieve gridlock.

More on this topic in Section D.

Fourth, in a previous case study communications were sent to Premier Doug Ford and Transportation Minister Prabmeet Sarkaria asking about their use of the term “gridlock”.

The email communications were sent November 12, 2024, and no responses were received in time to be included in that publication which was posted December 23, 2024.

Further, that request remains outstanding, because no response explaining what Premier Ford or MOT Minister Sarkaria mean by the term “gridlock” has been received in the intervening six months.

Details about the precedent inquiry into provincial government evidence to support claims about gridlock in the GTA are presented in Section E. With background Sections B, C, D, and E as context, Sections F, G, H, and I address the objectives and outcomes of this case study.

The precedent study (Section E) informs readers that the Cone of Silence **(1)** activated by Premier Ford, Minister Sarkaria, and anyone at MTO who was asked about anything related to the term gridlock.

Perhaps questions in this report about an apparent lack of gridlock evidence to justify expending \$50 billion to \$90 billion (est.) for a tunnel may induce levels of transparency and accountability which are appropriate for a case study asking questions about a transportation project of this financial, economic, spatial, and temporal magnitude and consequence.

Therefore, in the spirit of “If at first you don’t succeed try, try again” when seeking to oblige politicians to respect the principles of transparency and accountability, IRB is asking Premier Ford and MTO Minister Prabmeet Sarkaria to provide evidence of gridlock which justifies the construction of a \$50 billion to \$90 billion (est.) tunnel under the 401. More on this topic in Section F.

Continuing the transparency and accountability theme, while the provincial government has taken the lead on this matter, the gridlock phenomenon which is deemed cause for the tunnel occurs in the GTA, and the tunnel location under the 401 is also within the borders of the GTA.

Consequently, communications were sent to several members of council, City of Toronto, asking about City of Toronto productions reporting on gridlock studies and evidence of gridlock, as well as city discussions with the province in that regard. More on this topic in Section G.

Section H reports on our finding that Premier Doug Ford has not presented any evidence of gridlock in the GTA, much less a body of evidence that justifies construction of a tunnel under Highway 401 at an estimated cost of \$50 billion to \$90 billion.

Finally, Section I discusses the contribution made by the Universal Law of Location to the finding of this case study that proponents of constructing a tunnel under Highway 401 in the Greater Toronto Area (GTA) because of traffic gridlock on surface streets and roads have not produced evidence of gridlock, much less a body of evidence that justifies construction of a tunnel under Highway 401 at an estimated cost of \$50 billion to \$90 billion.

A closing note for the Background and Foreground section is that IRB is not aware of a government, academic, consulting, media, or other body which has asked or answered the research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

Upon being informed that the research question has been asked and/or answered previously, credit will be incorporated in a revision to this production.

## **B. A Brief Note on the History of the Term Gridlock in Provincial Government Statements about Transportation Policy, Program, and Planning Matters**

My experience in transportation policy, program, and planning matters in Ontario began in 1972 with my appointment as Senior Research Officer, then Urban Information Theme Coordinator, other posts, and Senior Policy Advisor, at the federal Ministry of State for Urban Affairs, 1972-1979.

Duties pertinent to this case study include having access to provincial productions in many policy, program, and planning sectors, including the Ministry of Transportation Ontario (MTO), with emphasis on activities with an information component, and especially the geographic information systems aspect.

For the period 1972-1979, I am unable to recall or to locate in my records any Ontario provincial government production which names “gridlock” as the reason for a provincial transportation policy, program, or planning action.

For the period 1979-2005, my academic appointment at the University of Ottawa as well as consulting, community service, professional association, and broadcast media experiences involved numerous inquiries and literature searches regarding MTO productions.

I am unable to recall, or to locate in my records any Ontario provincial government production which names “gridlock” as the reason for a provincial transportation policy, program, or planning action.

During 2005-2018 my consulting, community service, professional association, and broadcast media experiences involved numerous inquiries and literature searches regarding MTO productions. For that period, I am unable to recall or to locate in my records any Ontario provincial government production which names “gridlock” as the reason for a provincial transportation policy, program, or planning action.

There could be MTO productions created between 1972 and 2018 which mention “gridlock” and, quite possibly, provide evidence of the occurrence or non-occurrence of “gridlock events”. I welcome being informed of such productions. **(2)**

At the time of this writing, however, the IRB position is that no evidence-based production exists which names and confirms gridlock as the reason for a provincial transportation policy, program, or planning action prior to the election of the Doug Ford-led Conservative government in 2018.

## C. Previous Research Publications by B. Wellar on Traffic Gridlock

Five previous online publications on traffic gridlock are presented for background purposes.

1. [Traffic Gridlock: The Real Deal or a Pile of Nonsense?](#) (July 2011)
2. [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#) (December 2011)
3. [Tracking the Motives Behind the Phony War on "Traffic Gridlock"](#) (October 2012)
4. [What's Behind the Nonsense About Traffic Gridlock in Canada?](#) (December 2012)
5. [Transportation Question Begs for an Answer: What's Behind the Nonsense about Traffic Gridlock in Canada?](#) (January 2013)

These publications have been available for examination and challenge for more than ten years, which is a sufficient length of time for other researchers to counter the findings presented in the five productions.

That is, traffic is a 24hr everyday occurrence 365 days per year in cities across Canada and around the world, so if gridlock is the real deal and not just a pile of nonsense, or a figure of speech, then evidence to that effect should be readily producible, with emphasis on videorecording gridlock events so that there can be no doubt that gridlock is indeed a traffic phenomenon and not just the stuff of an urban fable or urban fairy tale. **(3)**

This report therefore repeats the request to Premier Ford, Minister Sarkaria, *et al* for evidence which supports claims of gridlock and justifies spending \$50 billion to \$90 billion (est.) to build a tunnel under Highway 401.

## D. A Note about the Lack of Regard for Evidence of Actual Gridlock in Media Stories about the 401 Tunnel

At the time of this writing in May 2025, many media stories have reported on statements by and about Premier Doug Ford regarding the need for a tunnel under Highway 401 due to gridlock in the Greater Toronto Areas (GTA).

Table 1 contains a selection of links to these statements.

**Table 1. A Selection of Media Statements in Which Premier Doug Ford Names Gridlock, or the Term Gridlock is Attributed to Him as the Reason for Constructing a Tunnel Under the 401**

<https://globalnews.ca/news/11120451/doug-ford-401-tunnel-feasibility-study-2-years/>

[Ford commits to building Hwy. 401 tunnel if re-elected](#)

[Doug Ford wants to dig a tunnel under Hwy 401 to ease ...](#)

[Doug Ford says he wants to build a tunnel under Hwy. 401](#)

[Doug Ford doubles down on promise to build a tunnel under ...](#)

[Ford government takes 'significant step' forward with 401 ...](#)

[Ontario gets moving on Highway 401 tunnel feasibility study](#)

[Ford's latest election promise is a \\$60 billion tunnel. Transit ...](#)

[Doug Ford asks Mark Carney to prioritize Highway 401 ...](#)

[Only Doug Ford and the Ontario PCs Will Protect ...](#)

[Does Doug Ford's massive highway tunnel make sense?](#)

[How Doug Ford's Highway 401 tunnel pitch could live in ...](#)

[Doug Ford's Highway 401 tunnel scheme latest disconnect ...](#)

[A Tunnel?! Ford Has Ideas About Gridlock](#)

[Ford promises tunnel under Hwy. 401 to ease GTA gridlock](#)

[Opinion: A tunnel under Highway 401? Is this some kind of ...](#)

[Highway 401 tunnel a 'visionary plan' to relieve gridlock in ...](#)

[Doug Ford's highway tunnel will not improve transport or ...](#)

[Doug Ford | While gridlock costs Ontario more than \\$56 ...](#)

[Ontario Exploring Feasibility of New Highway 401 Tunnel ...](#)

Hundreds more online media stories with themes similar to those presented in Table 1 were encountered in searches, and all stories encountered in our searches also have the central theme of this case study in common.

That is, not one of the reports examined to date makes any mention of Premier Doug Ford, Minister Prabmeet Sarkaria, the Ministry of Transportation, or any other provincial government entity providing evidence which establishes the actual incidence of even one gridlock event in the entire history of Toronto, much less providing empirical evidence that for the past several years gridlock has been and currently is running rampant and spreading resolutely up, down, and sideways throughout the Greater Toronto Area (GTA) on a daily basis.

A question which arises is whether the term “gridlock” is employed as a figure of speech by everyone using the term and, consequently, the matter of evidence is irrelevant, even though the bottom line involves expending \$50 billion to \$90 billion (est.) for a tunnel under 401.

And, if so, one of the follow-on questions is “If gridlock is a figure of speech, along the lines of ‘clear as mud but covers the ground’, then whatever is the specific, measurable phenomenon that is perplexing Premier Doug Ford to the point of widely and enthusiastically advocating for a tunnel under 401 with a potential price tag in the early estimate range of \$50 billion to \$90 billion?”

## **E. Precedent Report Investigating the Role of Evidence in Ontario Provincial Government Statements about Gridlock**

The report [Applying Universal Law of Location as a Transportation Planning Decision Tool: Ontario Government Data and Evidence Fail to Support Positions on Gridlock, Congestion, and Removal of Bike Lanes](#) is the product of a previous effort by IRB to gain insight into what Premier Ford and Minister Sarkaria mean by the term gridlock.

The core finding pertinent to this report is in the title, that is, apparently Ontario government data and evidence fail to support Ford’s position on gridlock and congestion. **(4)** And an associated finding is that Premier Ford, Minister Sarkaria, and MTO officials all seemed to avoid requests to explain their understanding of gridlock in structural, functional, and graphical terms, and that led to a change in research design.

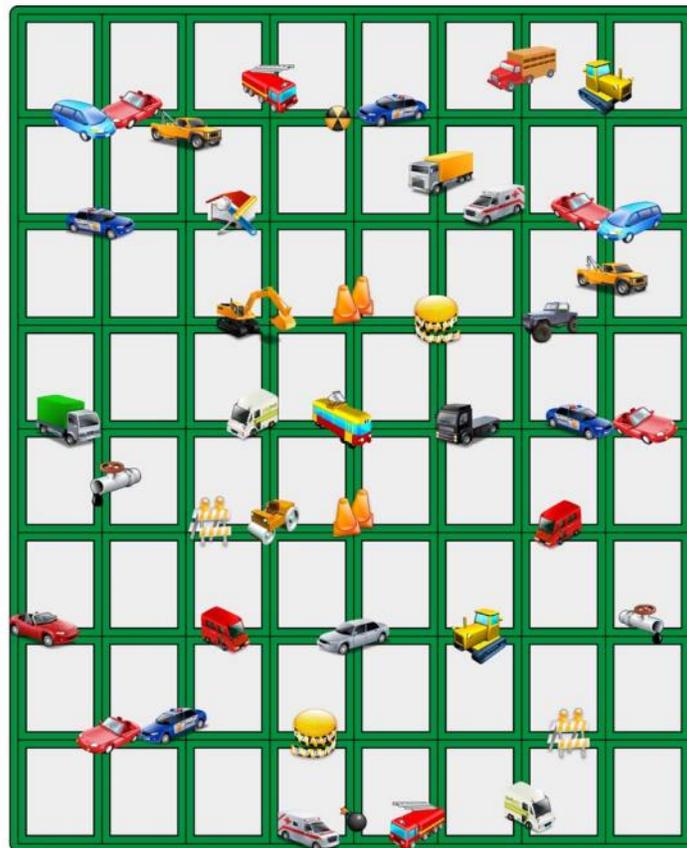
That is, it was decided to provide several gridlock schematics in the hope that they might prompt reactions by Premier Ford, Minister Sarkaria, and/or by their MTO or other

officials. Material from pages 22-26 of the precedent gridlock report is repeated here for the convenience of readers (in burgundy).

Several schematics are selected for this report, because they are sufficient to assess the utility of the Universal Law of Location as a transportation planning and decision tool for investigating issues involving provincial statements about gridlock.

Schematic 1 displays the concept of vehicle traffic blockage, which occurs multiple times per hour on many street segments in any large city.

### Schematic 1. Illustration of Vehicle Traffic Blockage



Legend

- Green = Streets with unobstructed vehicle traffic flow
- Icons = Incidents obstructing vehicle traffic flow
- Grey in black border = City block

*Icons represent different traffic incidents such as: Collision; Slow-moving city road-work vehicle; Stopped delivery truck; Stopped sanitation vehicle; Vehicle pulled over by traffic police; Signal light malfunction; Construction site; OWS demonstration; Vehicle with flat tire; Funeral procession; Visiting dignitary procession*

Source: [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#)

As shown, it is possible that “blocklock “could occur but, as the reader can readily ascertain by observation, even totally rendering immobile all the traffic that seeks to traverse intersections and street faces surrounding one block requires that total traffic jams simultaneously occur on surrounding streets and intersections to preclude vehicle movement away from the block that is locked. A more detailed explanation follows.

The following text is an excerpt taken from the original source.

*“That is, there are degrees of blockage, ranging from minimal to completely plugged.*

*At the lower end of the scale, blockage may amount to little more than a minor irritation or inconvenience, but at the upper end it can be a totally miserable, life threatening, insufferable, etc., condition that requires significant adjustments or corrections being made to maintain the entity under duress.*

*Figure A is an illustration of vehicle traffic blockage. As shown, a few street segments and intersections are obstructed. Consequently, motorized vehicle traffic cannot move in a free flow fashion down those specific streets or through those specific intersections due to such incidents as stalled vehicles, police issuing citations, sanitation trucks on their pick-up routes, delivery trucks stopping for drop-offs, signal lights out of commission, etc.*

*However, all the vehicles on all the other streets can move about relatively freely on the remainder of the street grid, and many of the vehicles on obstructed streets can reverse directions and/or turn left or right to get out of their current situations and can also use the remainder of the grid.*

*A similar line of argument holds for intersections which may be obstructed in whole or in part due to collisions, stalled vehicles, fire or police situations, left-turning vehicles, demonstrations, large volumes of pedestrians, parades, etc.*

*The timeworn response has been that if full or near-full blockage occurs at one intersection, vehicles are routed through other less-obstructed intersections.”*

*The preceding paragraphs, and variations of Figure A with more or fewer obstructions at a given point in time, let us say an hour, not only describe and portray the daily motor vehicle traffic situation in many cities in the modern, urbanized world, they describe a relationship that has been building in numerous cities over many decades. Namely, traffic congestion tends to be part-and-parcel of the urbanization process.”*

*We now move from the realistic concept of blockage for which there is empirical evidence, to gridlock for which no empirical evidence was located in studies done ten years ago, or for the current research.*

*“With traffic blockage as the (good) metaphor of context, we now move on to the metaphor of primary interest, “traffic gridlock”.*

*Figure B is based on the same street grid as Figure A, but instead of bits and pieces of motor vehicle traffic blockage here and there, what we now have is a situation wherein numerous intersections and street segments inside the perimeter of the grid are obstructed to the degree and extent that traffic is totally locked in or it is totally locked out of much of the grid.*

*As a result, motor vehicle traffic in this area (inside the perimeter streets and intersections) cannot move forwards, cannot move backwards, and cannot move sideways. Traffic is gridlocked. Or, to re-phrase, it is paralyzed.*

*Which leads to the question, “Could traffic blockage ever become a traffic gridlock event, and thereby justify use of the traffic gridlock metaphor to describe traffic blockage that renders a grid or a non-trivial portion of a grid paralyzed?”*

*The answer is, “Of course, but, and this is a huge but, the likelihood of ever witnessing such an event based on the record to date is about the same as witnessing a flying pig”.*

*By way of brief explanation, to get from Figure A to Figure B requires that every street segment is plugged and every intersection is totally obstructed at the same time so that motor vehicle traffic is precluded from entering, moving within, or leaving the gridlocked zone.*

*At the risk of entering into the domain of extreme hyperbole, what I believe it would take to reach such a state might be appropriately described as a raging epidemic of incidents occurring not just in short order, but originating from the centre of the gridlocked area and moving rapidly, systematically, and relentlessly outwards in a street-after-street and intersection-after-intersection fashion.”*

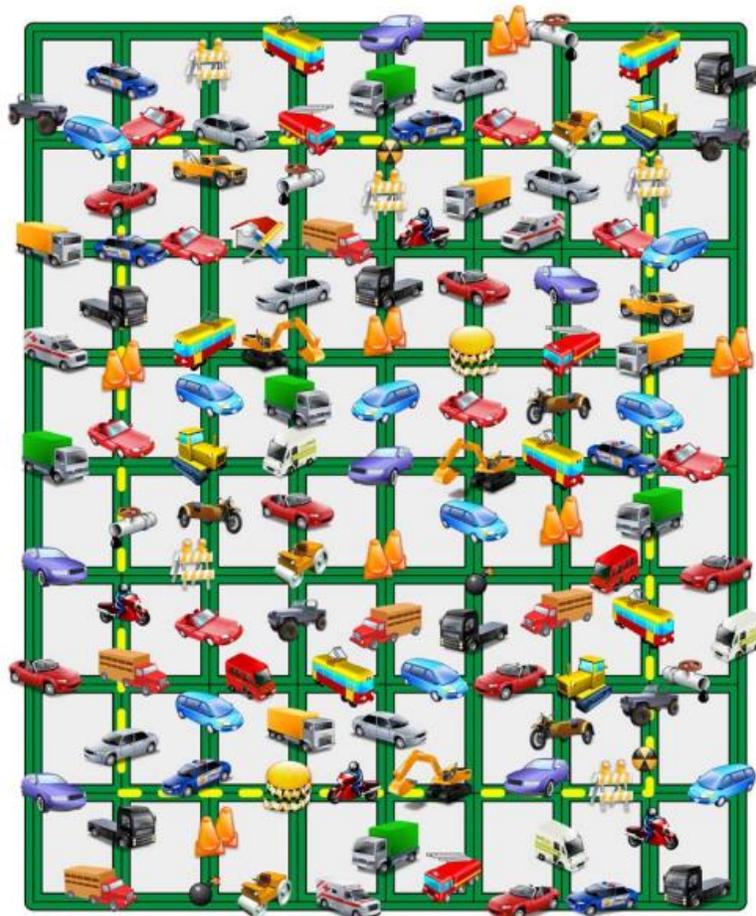
And more schematics are available in the original productions to illustrate what we looked at 13 years ago to explore the effort needed to simulate a gridlock process with a non-trivial number of intersections and road segments.

We have not seen empirical evidence of a gridlock event, but since MTO must have approved use of the term gridlock in the writing of Bill 212, it is reasonable to expect that

it will provide the link to the software used to simulate gridlock events based on hypotheticals far more complex than those in the original productions.

Further, due to advances in GIS science and technology over the past dozen years, if MTO uses simulation models to demonstrate how full-fledged gridlock events occur under different scenarios, then citizens may expect to see links to simulation models demonstrating how these events deconstruct over time and space.

### **Schematic 2. Illustration of Vehicle Traffic Gridlock**



**Legend**

- Green = Streets with unobstructed vehicle traffic flow
- Icons = Incidents obstructing vehicle traffic flow
- Grey in black border = City block
- Dashed yellow line = Gridlocked area

*Icons represent different traffic incidents such as: Collision; Slow-moving city road-work vehicle; Stopped delivery truck; Stopped sanitation vehicle; Vehicle pulled over by traffic police; Signal light malfunction; Construction site; OWS demonstration; Vehicle with flat tire; Funeral procession; Visiting dignitary procession*

Source: [Traffic Gridlock: A Bad, Mis-Leading Metaphor that Makes for Bad, Mis-Directed Public Policy](#)

Given the numerous statements by Premier Ford about gridlock, with those shown in Table 1 just an indication of his many remarks, it is reasonable to expect that with all the resources he has at his disposal he would be refuting the IRB report findings and concerns by providing the public with a detailed explanation supported by verifiable evidence of hours per day of brutal gridlock that he has observed, measured, and documented and/or others at MTO or other agencies, organizations, consulting firms, interest groups etc., have observed, measured, and documented.

Section F reports on the latest communications to Premier Ford in search of the evidence he must surely have examined to justify statements about spending \$50 billion to \$90 billion (est.) on a tunnel under the 401 in order to relieve the GTA from the grip of rampant and chronic gridlock.

## **F. Email Communications to Premier Ford and Minister Sarkaria re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

The emails to Premier Ford and Minister Sarkaria are presented as Exhibit 1 and Exhibit 2, respectively.

### **Exhibit 1. Email to Premier of Ontario re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

**From:** wellar.barry@gmail.com <wellar.barry@gmail.com>  
**Sent:** Wednesday, May 21, 2025 9:30 PM  
**To:** 'Premier of Ontario | Premier ministre de l'Ontario' <Premier@ontario.ca>  
**Cc:** 'George A. Neville' <george.neville@ncf.ca>; 'douglasarnold douglasarnold' <douglasarnold@sympatico.ca>; 'le hibou' <ottawaowl2@yahoo.ca>; wellar.barry@gmail.com; prabmeet.sarkaria@pc.ola.org; kinga.surmaco@pc.ola.org; peter.bethlenfalvy@pc.ola.org; marit.stiles@ontariondp.ca; doly.begum@ontariondp.ca; jennifer.french@ontariondp.ca; 'Vanthof' <JVanthof-QP@ndp.on.ca>; sblais.mpp.co@liberal.ola.org; ahazell.mpp.co@liberal.ola.org; twatt.mpp.co@liberal.ola.org; mschreiner-co@ola.org; omoore@globeandmail.com; lexharvey@thestar.ca; bspurr@thestar.ca  
**Subject:** Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?

Dear Premier Ford,

The Information Research Board (IRB) looks forward to your assistance in completing a report about the provincial government's intention to construct a tunnel in the 401 corridor through the Greater Toronto Area, an initiative which has received frequent mention in broadcast media and social media stories, postings, and comments.

The report is tentatively titled, ***Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?***

Review of broadcast media and social media reports, posts, comments, etc., reveals that there is widespread interest in a methodologically designed study seeking an answer to the question serving as the working title for the report.

Further, feedback on a recent Information Research Board (IRB) report – [Applying Universal Law of Location as a Transportation Planning Decision Tool: Ontario Government Data and Evidence Fail to Support Positions on Gridlock, Congestion, and Removal of Bike Lanes](#) – reveals that there is local, national, and international interest in the analytical approach taken by IRB in testing the utility of the Universal Law of Location (ULoL) as a transportation planning decision tool.

IRB therefore looks forward with great anticipation to receiving productions containing evidence upon which all tunnel decisions up to and including May 31, 2025, are based.

It is emphasized from the outset that IRB is not asking for information, or for studies to generate information, or for any materials that fall within the purview of FOI considerations.

Rather, IRB interest is in receiving links to existing digital productions containing the evidence used to justify decisions affecting the tunnel initiative. To facilitate exchanges of materials among tunnel researchers and report reviewers, it will be most appreciated if IRB is provided the links that enable the research team to directly access digital productions containing the gridlock evidence.

It is IRB's experience that the digital records route has become very efficient, so this approach should be win-win for all parties.

Premier Ford, IRB looks forward to receiving the requested materials at the earliest moment, so that at the earliest moment IRB may provide you and interested parties with a link to the case study report, ***Does the Evidence of Gridlock Justify Spending \$50***

***Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?***

IRB thanks you in advance for your assistance, Premier Ford.

Sincerely,

Dr. Barry Wellar, C.M., GISP  
Professor Emeritus, University of Ottawa  
President, Information Research Board Inc.  
133 Ridgefield Crescent  
Nepean, ON K2H 6T4  
CANADA  
<http://wellar.ca/informationresearch/>

**Exhibit 2. Email to Minister of Transport Prabmeet Sarkaria re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

**From:** wellar.barry@gmail.com <wellar.barry@gmail.com>

**Sent:** Friday, May 23, 2025 3:29 PM

**To:** prabmeet.sarkaria@pc.ola.org

**Cc:** 'Premier of Ontario | Premier ministre de l'Ontario' <Premier@ontario.ca>; 'George A. Neville' <george.neville@ncf.ca>; 'doug arnold' <douglasarnold@sympatico.ca>; 'le hibou' <ottawaowl2@yahoo.ca>; wellar.barry@gmail.com; marit.stiles@ontariondp.ca; doly.begum@ontariondp.ca; jennifer.french@ontariondp.ca; 'Vanthof' <JVanthof-QP@ndp.on.ca>; sblais.mpp.co@liberal.ola.org; ahazell.mpp.co@liberal.ola.org; mschreiner-co@ola.org; twatt.mpp.co@liberal.ola.org

**Subject:** Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?

Dear Minister Sarkaria,

The Information Research Board (IRB) looks forward to your assistance in completing a report about the provincial government's intention to construct a tunnel in the 401 corridor through the Greater Toronto Area, an initiative which has received frequent mention in broadcast media and social media stories, postings, and comments.

Several points of context may assist in preparing your response.

First, you are copied on an email sent May 20, 2025, to Premier Ford re the IRB report in progress, ***Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?***

I believe that your Ministry is the lead agency on this file, and that it will have sign-off authority for ensuring that all inquiries about access to productions are met. If that is the case, please provide the name(s) and email address(es) of the person(s) I am to contact in future communications regarding productions containing evidence used to make policy, program, planning, operations, or other kinds of decisions affecting the tunnel.

If that is not the case, please advise as to the agency I am to contact regarding productions containing evidence used to make policy, program, planning, operations, or other kinds of decisions affecting the tunnel.

Second, review of broadcast media and social media reports, posts, comments, etc., reveals that there is widespread interest in a methodologically designed study seeking an answer to the question serving as the working title for the report.

As you may recall from previous communications, you are among officials named in a previous Information Research Board (IRB) report – [Applying Universal Law of Location as a Transportation Planning Decision Tool: Ontario Government Data and Evidence Fail to Support Positions on Gridlock, Congestion, and Removal of Bike Lanes](#) – which has received local, national, and international attention for the analytical approach taken by IRB in testing the utility of the Universal Law of Location (ULoL) as a transportation planning decision tool.

IRB therefore looks forward with great anticipation to receiving productions containing evidence including gridlock evidence upon which all tunnel decisions up to and including May 31, 2025, are based.

Third, it is emphasized that IRB is not asking for information, or for studies by your agency or any provincial government agency to generate information, or for any materials that fall within the purview of FOI considerations.

Rather, IRB's interest is in receiving links to existing digital productions containing the evidence used to justify decisions affecting the tunnel initiative.

Please rest assured that IRB is fully capable of deriving any information it needs from the productions provided by your Ministry or any provincial agency.

Fourth, to facilitate exchanges of materials among tunnel researchers and report reviewers, it is requested that IRB is provided the links that enable the research team to directly access digital productions containing the gridlock evidence.

It is IRB's experience that the digital records route has become very efficient for creating, managing, and disseminating productions, so this approach should be win-win for all parties.

Minister Sarkaria, IRB looks forward to receiving the requested materials at the earliest moment, so that at the earliest moment IRB may provide you and interested parties with a link to the case study report, ***Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?***

IRB thanks you in advance for your assistance, Minister Sarkaria.

Sincerely,

Dr. Barry Wellar, C.M., GISP  
Professor Emeritus, University of Ottawa  
President, Information Research Board Inc.  
133 Ridgefield Crescent  
Nepean, ON K2H 6T4  
CANADA  
<http://wellar.ca/informationresearch/>

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Both emails were transmitted successfully, but as of June 5, 2025, no substantive response was received from Premier Ford or Minister Sarkaria. Given that no substantive response has been received for a number of previous communications, the report will proceed apace and if evidence is received the report will be updated accordingly.

### **G. Email Communications to Mayor Chow and Councillors Bradford, Colle and Perks, City of Toronto, re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

Doug Ford is a former councillor, City of Toronto, and although IRB did not locate any media stories which referred to him raising the topic of gridlock while on council, it

seems likely that he would know elected City of Toronto officials to contact about traffic issues in general, and about studies yielding evidence of gridlock in particular.

Given Premier Ford's repeated failure to respond to IRB inquiries in a timely manner, emails were sent to Mayor Chow and Councillors Bradford, Colle, and Perks to ask for "guidance as to how we can best proceed in confirming whether the City of Toronto is a source of evidence regarding gridlock events affecting the 401 corridors."

The email to Mayor Chow copied to councillors is shown as Exhibit 3, and Exhibit 4 is the email to councillors, with that to Councilor Bradford used for illustrative purposes.

**Exhibit 3. Email to Mayor Chow, City of Toronto, re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

**From:** wellar.barry@gmail.com <wellar.barry@gmail.com>

**Sent:** Friday, May 23, 2025 4:03 PM

**To:** mayor\_chow@toronto.ca

**Cc:** councillor\_colle8@toronto.ca; councillor\_mckelvie@toronto.ca; councillor\_perks@toronto.ca; councillor\_bradford@toronto.ca; wellar.barry@gmail.com; wellar.barry@gmail.com

**Subject:** Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?

Dear Mayor Chow,

The attached email of May 20, 2025, to Premier Doug Ford, ***Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?***, notes that the Information Research Board (IRB) is examining the evidence of gridlock that justifies the provincial government's intention to construct a tunnel in the 401 corridor through the Greater Toronto Area.

And, a related communication was sent May 22, 2025, to Minister of Transportation Prabmeet Sarkaria. It is also attached.

Mayor Chow, it occurs that the City of Toronto could have provided evidence of gridlock which precipitated the provinces' 401 tunnel initiative, hence this communication.

However, after numerous search hours I have not located any municipal government reports or other productions containing evidence of consequential gridlock events in the Greater Toronto Area, much less evidence of multiple gridlock events occurring with regularity and demonstrating a confirmed pattern of chronic 401 susceptibility to observable and measurable gridlock conditions.

It is of course possible that publicly accessible evidentiary productions the City of Toronto exist, and that the search procedures used by IRB failed to identify these productions.

The IRB team will be most grateful to receive your guidance as to how we can best proceed in confirming whether the City of Toronto is a source of evidence regarding gridlock events affecting the 401 corridor.

In the meantime since we are working with time constraints, by copy I am contacting several members of council (Councillors Bradford, Colle, McKelvie, and Perks) in the event that one or more of them has hands-on experience with the 401-corridor tunnel file and may respond to this inquiry.

Mayor Chow, thank you in advance for your timely response to this communication.

Dr. Barry Wellar, C.M., GISP  
Professor Emeritus, University of Ottawa  
President, Information Research Board Inc.  
133 Ridgefield Crescent  
Nepean, ON K2H 6T4  
CANADA  
<http://wellar.ca/informationresearch/>

**Exhibit 4. Email to Councillor Bradford, City of Toronto, re Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?**

**From:** wellar.barry@gmail.com <wellar.barry@gmail.com>  
**Sent:** Thursday, May 29, 2025 8:57 PM  
**To:** councillor\_bradford@toronto.ca  
**Subject:** FW: Does the Evidence of Gridlock Justify Spending \$50 Billion (est.) on an E-W Tunnel in the 401 Corridor Across the Greater Toronto Area?

Dear Councillor Bradford,

You are copied on this email to Mayor Chow, but since some politicians do not respond to cc's I am contacting you directly.

Your thoughts on this matter will be much appreciated.

Regards,

Barry Wellar

Dr. Barry Wellar, C.M., GISP  
Professor Emeritus, University of Ottawa  
President, Information Research Board Inc.  
133 Ridgefield Crescent  
Nepean, ON K2H 6T4  
CANADA  
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There is no reason to expect these communications to yield evidence so the report will proceed apace and will be amended if evidence is received.

## **H. Is the Evidence of Gridlock Sufficient to Justify Spending \$50 Billion to \$90 Billion (est.) on a Tunnel Under a Section of Highway 401 in the Greater Toronto Area (GTA)?**

The answer to the research question for this case study is an unequivocal NO.

Three findings should suffice to confirm that answer.

First, despite a number of requests asking Premier Doug Ford and MTO Minister Pradmeet Sarkaria to provide evidence of gridlock in the GTA to justify spending \$50 billion to \$90 billion (est.) on a tunnel under the 401 in the GTA, no evidence has been forthcoming.

In my experience, and the experiences of others with many years in the field of dealing with politicians, the opportunity for a politician to bring existing evidence to bear to win an argument is rarely missed.

In the absence of providing evidence that he has evidence it is therefore concluded that Premier Doug Ford has no evidence of gridlock events in the GTA, much less perpetual, omnipresent gridlock in the GTA sufficient to justify a tunnel program costed in early estimates at \$50 billion to \$90 billion.

Second, the City of Toronto is the affected party in the gridlock-tunnel narrative, and a party which brings to the table an international reputation for data-driven and evidence-based decision-making.

A review of City of Toronto public documents did not reveal evidence-based studies of gridlock at the event level, much less as a perpetual or chronic condition, and communications to mayor and councillors about evidence-related dealings with Premier Doug Ford regarding the gridlock-tunnel narrative drew a blank.

Third, traffic congestion has been part of “the urban transportation problem” literature for more 75 years and it appears fair to say that all the stories associated with Premier Ford’s gridlock-tunnel narrative are just more of the same old, same old.

That is, all the stories are just standard fare in the congestion literature, and there is no evidence that a tunnel will fix or is the best way to mitigate Toronto’s ‘almost-at-the-point-of-no-return congestion’ if it exists, but it will have no effect on gridlock which does not exist.

The bottom line, then, is that if evidence is required before the provincial government spends large amounts of money on transportation projects, it will not be spending \$50 billion to \$90I (est.) on a tunnel under Highway 401 to fix a non-existent gridlock figment.

## **I. Contribution of the Universal Law of Location to This Case Study on Testing for Evidence to Support Claims about Traffic Gridlock**

The Universal Law of Location states that something is everywhere under, on, and above the surface of the Earth.

According to the Universal Law of Location, therefore, in order for a state of traffic gridlock to be achieved it is necessary that a grid of streets is so densely packed with vehicles that no vehicles can enter and none can exit the gridlocked set of streets.

The Universal Law of Location therefore makes a clear distinction between the concepts of gridlock and congestion.

In the case of gridlock there is no room for vehicles to maneuver, and they cannot enter, go through, or exit from the set of streets comprising the grid of locked streets.

In the case of congestion, however, sooner or later there is space in front to drive forward and escape, space behind to reverse and escape, and space at a side to turn off and escape, so there are multiple ways to escape what are commonly referred to as traffic jams.

And, of course, if private motor vehicle gridlock and excessive congestion are imagined or real mobility issues, the Universal Law of Location informs us that adding capacity by building a tunnel is a flawed intervention that just kicks effective land use planning and transportation actions down the road a bit.

## **J. Conclusion**

With regard to the case study research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

the finding is NO.

Communications to Premier Doug Ford and MTO Minister Prabmeet Sarkaria as well as Mayor Olivia Chow and Councillors Bradford, Colle, and Perks, City of Toronto, did not yield any evidence that could assist in answering the case study's research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

Further, searches of Ontario provincial government and Ontario municipal government open literature did not yield any evidence that could assist in answering the case study's research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

And searches of academic, popular (broadcast and social media), professional, trade, and technical bodies of literature did not yield any evidence that could assist in answering the case study's research question,

Is the evidence of gridlock sufficient to justify spending \$50 billion to \$90 billion (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA)?

It is therefore concluded that there is no evidence of gridlock in the Greater Toronto Area (GTA), much less sufficient evidence of gridlock to justify spending \$50 billion to \$90 (est.) on a tunnel under a section of highway 401 in the Greater Toronto Area (GTA).

The second finding pertains to the Universal Law of Location that something is everywhere under, on, and above the surface of the Earth.

With its focus on geographic data and evidence, the Universal Law of Location informs that the concept of gridlock begins with a grid of intersecting streets and roads which are covered with motor vehicles so densely packed that no vehicles in the grid, which is locked, can leave and no vehicles can enter.

Further, the Universal Law of Location informs that if a grid of streets and roads is locked, producing evidence is a simple matter using drone technology, and a compelling case for demonstrating the significance of gridlock to the Greater Toronto Area can be readily made using geographic information systems science and technology.

The utility of the Universal Law of Location as a transportation planning decision tool is therefore confirmed by its ability to establish that notions of mitigating a non-existent condition of so-called gridlock by constructing a tunnel under highway 401 somewhere in the Greater Toronto Area (GTA) is the stuff of fable, fairy tale, and fiction, and is far removed from the realities of data-driven and evidence-based land use planning and transportation planning decision processes.

## **K. Endnotes**

1. For discussion of cone of silence issues and practices see, for example, [Interim Report 24. Survey Says Citizens Should Ask MPs Hard Questions About the Access to Information Act \(ATIA\) Review Process](#); [Interim Report 18. Invoking the Code of Conduct to Publicly Oblige City of Ottawa Politicians to Demonstrate Due Regard for Transparency and Accountability](#) [Interim Report 20. Nomination for the 2020 Code of Silence Award: City of Ottawa Supporting Evidence – Communications to Mayor and Councillors that Received ‘The Silent Treatment’](#); [Interim Report 21. Nomination for the 2020 Code of Silence Award: City of Ottawa Supporting Evidence – Media Stories That Indicate a Code of Silence Has Been Adopted by Members of Council](#).

2. The term “fugitive” as in “fugitive literature” may be used to describe productions which are known or thought to exist but for various reasons are or are said to be difficult or impossible to locate or to retrieve. The term is often used in reference to government productions, hence the qualifying remark that documents about “gridlock” could be in provincial government files.

3. Fable and fairy tale are subject to many definitions, as are synonyms such as fiction, tall tale, figment and myth, but the one thing which these creations of imagination have in common is that they are not subject to being tested for or by real-world evidence. So, regardless of which meaning is taken for either term, or their synonyms, the bottom line is that all the terms are applicable to stories about gridlock for which there is no

evidence of existence. Or, to re-phrase for this circumstance, in the absence of evidence gridlock is just a figure of political speech, nothing more.

**4.** Minister Sarkaria and MTO officials may have positions on gridlock, congestion, traffic flows, etc., but Premier Ford is the apparent point person on the gridlock-tunnel file. As a result, he is taken to represent himself and the Ontario government on this topic.

Further, in the interests of clarity, transparency, and accountability it is reasonable to name Mr. Ford as the IRB contact person so that communications to the provincial government do not “fall between chairs”.

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