

March 27, 2015

Kathy Hering
Senior Policy Analyst
Ministry of the Environment and Climate Change
Air Policy and Climate Change Branch
77 Wellesley Street West, Floor 10
Toronto, ON M7A 2T5

Re: Ontario's Climate Change Discussion Paper 2015

Dear Ms. Hering,

We are writing to provide feedback on the climate change discussion paper released by the Ministry of Environment and Climate Change on February 12, 2015. Specifically we would like to provide comments on the transportation and land use components of the discussion paper. We appreciate the Province of Ontario's efforts to reduce emissions from the transportation sector and to implement infrastructure and planning improvements to provide viable travel choices for Ontarians, such as active transportation and increased transit use to reduce overall vehicle use and achieve greater overall transportation system efficiency.

Who We Are

- The Toronto Centre for Active Transportation (TCAT) is a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling.
- The Toronto Cycling Think and Do Tank (TCT2) is a research organization based at the University of Toronto directed by Dr. Beth Savan. TCT2 specializes in identifying, understanding and reducing barriers as well as identifying, understanding and increasing facilitators of cycling.
- Cycle Toronto is a diverse member-supported organization that advocates for a healthy, safe, cycling-friendly city for all. Cycle Toronto has more than 2,800 members.
- Dr. Paul M. Hess is an Associate Professor and the Associate Chair and Director of the Graduate Programs in Planning in the Department of Geography and Planning at the University of Toronto. His teaching and research focus is on active transportation, pedestrian environments and design, streets as public space, and urban form.
- Dr. Raktim Mitra is an Assistant Professor at the School of Urban and Regional Planning, Ryerson University, and an emerging scholar in the field of active transportation. He teaches graduate and undergraduate courses on transportation and healthy communities. Dr. Mitra's research is primarily focused on children's mobility in urban space, and on urban cycling.

TCAT works closely with all of these partners including: 1) Currently TCAT and TCT2 are working together on a community based social marketing program in Peel Region, 2) TCAT, Dr. Mitra and Dr. Hess recently completed a research project to catalogue and develop an evaluation framework for Complete Streets in Ontario's growth centres, and 3) TCAT, TCT2 and Cycle Toronto were invited members of the Ontario Ministry of Transportation's 2013 Working Group on Ontario's Cycling Strategy.



Context

In Ontario, the transportation sector accounts for the largest segment of GHG emissions (34%) and is the segment in which emissions are growing most quickly.^{i, ii} Transportation sector emissions are created by the combustion of fossil fuels in motor vehicles, with passenger vehicles accounting for the largest share (over half) of these emissions.^{iii, iv} There are negative social costs associated with our current road transport systems, including increased traffic congestion throughout southern Ontario^v, increased mortality related to motor vehicle collisions and carbon monoxide levels^{vi}, and increased health costs associated with motor vehicle collisions and physical inactivity.^{vii}

In order to meet Ontario's emissions targets it is necessary to spur change to both how and how much we travel. Change needs to be strategic, as currently not all trips have low emission alternatives and transportation infrastructure is a multigenerational investment that once established is difficult to change both physically and culturally. As active transportation (AT) specialists we find ourselves in agreement with an increasing number of groups, including major oil companies,^{viii, ix} in that we believe a carbon price is the most predictable and surest method to fund change. We also believe carbon pricing will be effective in changing transportation choices and helping Ontario meet emissions reductions targets in the transportation sector if invested to prioritize modes in order of emissions – first pedestrians, then cyclists, then transit riders, then car sharers and then single occupancy electric vehicles (SOEVs). Investments should be tied to emissions, adaptation and resilience benefits, again prioritizing the same sequence of modes based on their capacity to improve local economic development, individual health, environmental quality and community livability.

While SOEVs have the potential to reduce emissions and have a role to play in the transportation landscape, they remain a resource intensive option due to emissions from material production and road space requirements. Additionally, SOEVs fail to solve the economic and quality of life issues associated with traffic congestion, urban sprawl, deaths by automobile, and physical inactivity. To efficiently and cost effectively reduce emissions and to simultaneously create healthy, resilient economically thriving, adaptable communities, we need to prioritize active transportation. This priority aligns with public desire for improved opportunities for active transportation.^{xi, xii}

Our Vision For Sustainable Mobility involves enabling everyone to get everywhere with low emissions and a high quality of life. Sustainable mobility is predicated on active transportation as the first option, with other more consumptive options available to permit those unable to reach destinations by AT to get anywhere they need to. Integration between public transit and AT, particularly in lower density urban areas, is fundamental to supporting multi-modal transport over long trip distances. Sustainable mobility involves adopting the Vision Zero approach to road safety in which no loss of life is acceptable.

Recommended Priority Actions

1. *Provincial Policy and Regulations*

a. Policy and Approvals Process

- The Municipal Class Environmental Assessment process should streamline road diets that include active transportation infrastructure and require a more rigorous approval process for removing bike lanes and sidewalks. (For more information see TCAT's submission to the Ministry of the Environment on this topic: <http://www.tcat.ca/general-news/2153/>)
- The Province should incorporate Complete Streets policy language within the Provincial Policy Statement and strong, direct language to ensure that municipalities plan streets for walking and cycling. (For more information see TCAT's detailed comments on PPS at: <http://www.tcat.ca/general-news/2172>)

- Ontario's Cycling Strategy should be implemented with aggressive targets and funding envelopes. (See our press release on this issue: <http://www.tcat.ca/general-news/ontarios-new-cycling-strategy-bold-vision-applauded-bold-action-still-required/>)
- Infrastructure funding for AT should be linked with policy and programming investments, targeting areas with a high proportion of trips under 7 km to maximize return on investment.
- We are in full support of the Province's recent proposal to reduce the default speed limit from 50 km/hr to 40 km/hr. However this does not go far enough. In 2012, in a Pedestrian Death Review, the Chief Coroner for Ontario recommended that speed limits be reduced to 30 km/hr in residential neighbourhoods. We also recommend that 30 km/hr speed limits be instituted within 2 km of all schools, daycares, hospitals and seniors residences in order to reduce deaths by automobiles of vulnerable populations.

b. Working with Municipalities

- The Growth Plan for the Greater Golden Horseshoe contains broad statements about incorporating walking and cycling into land use and transportation planning. The Province can spur measurable action by providing municipalities with clearer direction and specific benchmarks. (For more information see Dr. Paul Hess' and TCAT's report: <http://www.tcat.ca/knowledge-centre/identifying-and-overcoming-barriers-to-the-implementation-of-active-transportation-policies/>)
- Integration of transit and AT should be high priority. A specific proportion of transit funding needs to be dedicated for active transportation infrastructure development. Transit stations should act as AT hubs with cycling and walking infrastructure radiating into 5km catchment areas. The Province urgently needs to develop a task force to work with municipalities to develop this key piece of the transit AT integration puzzle. AT infrastructure will reduce need for automobile parking, reduce need for feeder buses and increase transit ridership, and reduce congestion surrounding transit stations. Retrofitting areas around transit stations for AT needs to be a provincial and municipal policy focus. (For more information see TCAT's report "The Other 25% - The Big Move and Active Transportation Investment: <http://www.tcat.ca/knowledge-centre/the-other-25-the-big-move-and-active-transportation-investment/>)
- Funding transfers to municipalities should be tied to development of local transportation plans that prioritize AT, then transit, then multiple occupant vehicles. The Province should fund development of AT infrastructure and a portion of the operating costs of public transit systems from any carbon pricing that is implemented. Regional AT plans need to be funded so users can travel easily between jurisdictions.
- The Province should develop a consistent process and program for municipalities to collect data on pedestrians and cyclists.

2. *Regional Planning*

- Following the examples set by Denmark^{xiii} and the UK^{xiv}, Cycle Superhighways should be studied to enable longer distance trips, and in conjunction with tourism strategies.
- Bicycling should have its own plan, department and focus within Metrolinx. Currently, most bicycling activity is treated as a transportation demand management (TDM) issue within Smart Commute. While TDM is an important strategy to change travel behaviour, the fundamental infrastructure and service shortfalls associated with increasing cycling for transportation are largely being ignored. No one has direct responsibility for increasing cycling mode share.

3. *Community Based Activities*

The Province should provide municipalities with funding to overcome local barriers to cycling including:

- Provision of secure and covered parking for bicycles at transit stops and tower communities where higher barriers to cycling exist^{xv} as well as programs to increase covered parking at community centres, malls and office blocks that are targeted AT community destinations.
- Subsidies for community bicycle hubs focused on increasing community competence in basic utilitarian cycling skills and bicycle maintenance in urban communities with low mode share and a consequent lack of utilitarian cycle service facilities and collective competence.
- Subsidies for community based cycling uptake programs based on evidence-derived design.

4. *Research and Evaluation*

To ensure AT contributes to mitigation, adaptation and resilience the Province should:

- Establish clear goals for AT mode share and zero automobile caused deaths and report annually on progress towards goals.
- Research, recognize and integrate the benefits accruing from AT, linking the silos of health promotion, climate change mitigation and adaptation and local economic development.
- Tie AT initiatives to baseline and post implementation measures that address emissions and other economic and community benefits.
- Provide direction and support to municipalities to use metrics beyond mere commuter counts, including 1) pre/post studies to study and improve new infrastructure (for more information see TCAT's Complete Streets catalogue and evaluation project at: <http://www.tcat.ca/project/understand-complete-streets-in-the-greater-golden-horseshoe/>), 2) data collection on cyclist and pedestrian gender, age, collision statistics and gender and age of those injured or killed by cars, and 3) bike parking and infrastructure per head of population and bike tracks per km of roadway – aim for parity in both cases and track progress.

5. *Cultural Change*

Transportation choices and options are cultural and are related to not just ease and cost of movement, but tradition, status and social norms. Our current transportation culture is heavily oriented towards the use of privately owned motor vehicles and the costs they impose are treated as “normal”.

Actions to help change this norm include:

- Increasing the legitimacy of bicycles through uniformed service fleets by expanding police and paramedic bicycle fleets: incenting bi(tri)cycle fleets for Community Care Access Centre (CCAC) service delivery by personal support workers and nurses; and tax incentives for delivery services to use bi(tri)cycle fleets in urbanized areas.
- Establishing walking and cycling education as a mandatory part of the Ontario Grade 6 curriculum in order to build collective competence in cycling for transportation.
- Modeling cultural change by ‘walking the talk’ within the Provincial Government, the civil service and Ontario’s Crown Corporations. Carbon based activities including cars and air transport should not be used as status symbols or rewards. Provincial automobile fleets should be analyzed for both necessity and emissions impacts and changes instituted. Increased levels of responsibility should not be aligned with increased emissions impact i.e. a more senior position cannot reasonably result in a bigger engine and more emissions in a low carbon culture. The Province should implement employee engagement and reward programs to accelerate adoption of AT for civil service commuters and provide bike fleets for work related travel.

In Conclusion

We encourage the Province to prioritize modes in order of emissions – first pedestrians, then cyclists, then transit riders, then car sharers and then SOEVs. Investments should be tied to emissions, adaptation and resilience benefits, again prioritizing the same sequence of modes based on their capacity to improve local



economic development, individual health, environmental quality and community livability. As communities embrace change, help them celebrate their progress and legitimize active transportation at every opportunity.

Thank you for the opportunity to comment on this important topic.

Sincerely,

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ⁱ Environment Canada. (2014) National Inventory Report 1990-2012: Greenhouse Gas Sources and Sinks in Canada Executive Summary, 4-6.

ⁱⁱ Ministry of the Environment and Climate Change. (2014). Canada and Ontario's Climate Change Update 2014, 7-8, 20.

ⁱⁱⁱ Environment Canada. (2014) National Inventory Report 1990-2012: Greenhouse Gas Sources and Sinks in Canada, Executive Summary, 4-6.

^{iv} Ministry of the Environment and Climate Change. (2014). Canada and Ontario's Climate Change Update 2014, 7-8.

^v Greater Toronto Transportation Authority. (2008). Costs of Road Congestion in the Greater Toronto and Hamilton Area: Impact and Cost Benefit Analysis of the Metrolinx Draft Regional Transportation Plan. Toronto, Ontario, Canada.

^{vi} Burnett, R. T., et al.. (1998). The association between ambient carbon monoxide levels and daily mortality in Toronto, Canada. Journal of the air & waste management association, 48(8), 689-700.

^{vii} Toronto Public Health. (2012). Road to Health: Improving Walking and Cycling. Toronto, Ontario, Canada, Toronto Public Health.

^{viii} Exxon Mobil Corporation. (2013). Investor CDP 2013 Information Request, 5.1a.

^{ix} British Petroleum. (2013). Investor CDP 2013 Information Request, 5.1a

^x Royal Dutch Shell. (2013). Investor CDP 2013 Information Request, 5.1a

^{xi} City of Toronto. (2011). Living in Downtown and the Centres Report.

^{xii} Share the Road. (2014). 2014 Public Opinion Survey Research Summary. Retrieved from:
<http://www.sharetheroad.ca/files/STR2014Pollingsummary.pdf>

^{xiii} Denmark. Cycle Super Highway. Retrieved from: <http://denmark.dk/en/green-living/bicycle-culture/cycle-super-highway/>

^{xiv} Business Insider (Feb 5, 2015). London just approved a new plan for 'cycle superhighways' - here's what they'll look like. Retrieved from: <http://www.businessinsider.com/london-bicycle-superhighways-2015-2>

^{xv} Ipsos Reid (2009). City of Toronto Cycling Study: Tracking Report (1999 and 2009). Retrieved from: City of Toronto (2009) survey suggests that only 33% of Toronto's cyclists live in apartment buildings, compared to 51% of non-cyclist survey participants.