

November 15, 2017

Peter Paz
Manager, Regional Partnerships, Planning and Policy
Metrolinx
97 Front Street West, 4th Floor
Toronto, ON M5J 1E6

By email:
theplan@metrolinx.com

Re: Draft 2041 Regional Transportation Plan for the Greater Toronto and Hamilton Area

Dear Mr. Paz and members of the Plan Review Team,

We are writing to provide feedback on the Draft 2041 Regional Transportation Plan for the Greater Toronto and Hamilton Area, released in September 2017. Our comments build on our previous submission, which provided input on the Discussion Paper for the Next Regional Transportation Plan for the Greater Toronto and Hamilton Area, released in August of 2016. Our November 2016 comments on the discussion paper can be found [here](#).

We appreciate Metrolinx's commitment to aligning the transportation network with land use, to creating a thriving, sustainable, and well-connected region, and to building a transportation system that prioritizes moving people over motor vehicles. With this vision in mind, our comments relate specifically to the active transportation components of the Draft 2041 RTP.

Who We Are:

- Nancy Smith Lea is the Director of the Toronto Centre for Active Transportation (TCAT), 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. TCAT was an invited member of the Ontario Ministry of Transportation's 2013 Working Group on Ontario's Cycling Strategy as well as the joint Ontario Ministry of Transportation + Tourism, Culture and Sport 2017 Advisory Panel on Cycling.
- Dr. Raktim Mitra is an Associate Professor in the School of Urban and Regional Planning and co-director of TransForm: The Transportation and Land Use Planning Research Laboratory at Ryerson University. His teaching and research focuses on the neighbourhood environment – travel behavior – health interaction, particularly in the Greater Golden Horseshoe Region (GGH) region.



A Project of Clean Air Partnership

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In our work together we have produced the following reports:

- With funding from Metrolinx, Dr. Mitra and TCAT worked together on a research report that quantifies potential for cycling growth, and identifies areas with high and low cycling potential across the Greater Toronto and Hamilton Area (GTHA): [Cycling Patterns and Potential in the Greater Toronto and Hamilton Area](#) (2016).
- With funding from the Places to Grow Implementation Fund, TCAT, Dr. Mitra, and Dr. Hess from the University of Toronto, produced a series of publications to understand Complete Streets and active transportation in the GGH Region: [Active Transportation Planning Beyond the Greenbelt](#) (2017), [Complete Street Transformations](#) (2016), and [Complete Streets Catalogue & Evaluation Tool](#) (2015).

1. Comments on the Vision, Goals, and Strategies

Overall, we support the vision for a well-connected, multi-modal transportation system across our region. We support the visionary focus on complete communities, high quality of life, and economic and environmental sustainability, and believe that active transportation plays a critical role in actualizing this vision. In addition to the elements articulated in the Draft 2041 RTP vision, we would like to see an inclusion of transportation equity and accessibility in the vision for our region's transportation system—a transportation system that is designed with equity and accessibility at its core will contribute to a healthier and more vibrant region.

While we agree with the principles behind the Draft 2041 RTP's three goals and five strategies, we find this organization of Plan content lacks clarity. For individuals and agencies looking to align their work with the Plan, it is not immediately evident which strategies relate to different components of the transportation system. For example, there is not a strategy specifically dedicated to improving active transportation in our region. We acknowledge the integrated nature of these strategies, and the need to meaningfully organize Priority Actions, but we find that these five strategies do not adequately describe plan content. In contrast, the ten strategies articulated in *The Big Move* clearly described the actions addressed under each strategy.

With this comment in mind, we would like to present feedback on the strategies that relate to active transportation.

2. Responses to Strategy 1: Complete Delivery

2.1 We are in support of the complete delivery of current regional transit projects. As these projects roll out, we encourage a strong focus on planning for the first and last mile (see our response to Strategy 3 for more detail), and building meaningful connections between active transportation infrastructure and new transit corridors.

3. Responses to Strategy 2: Connect the Region

3.1 We support the focus on an integrated and well-connected region. However, we see a missed opportunity in the priority actions articulated in this strategy—the actions do not acknowledge the role that active transportation infrastructure should play in connecting the region. Specifically, we ask you to consider the following:

3.1.1 As Metrolinx works to expand the Frequent Rapid Transit Network and complementary bus services, a predictable portion of every regional transit capital project budget should be dedicated to active transportation, ensuring that active transportation connections to new transit developments are strong across the region.

3.1.2 Likewise, future transit developments should enable multi-modal travel to/from transit. In addition to creating developments that prioritize first- and last-mile solutions to support active transportation, transit vehicles on new corridors should be equipped to accommodate bicycles.

4. Responses to Strategy 3: Optimize the System

4.1 We are in agreement that planning for the first- and last-mile is an essential component in optimizing the transit and transportation system, and that a collaborative regional approach to first- and last-mile planning is necessary. Under the umbrella of “planning for the first and last mile”, we are particularly pleased to see Metrolinx acknowledge the following:

4.1.1 That it is “not sustainable to rely primarily on travellers driving to transit stations and providing them with free parking” (Draft 2041 RTP, p. 69). As articulated in our previous response to the Discussion Paper, the massive free parking lots at GO stations provide significant incentive for people to drive, rather than choosing active modes of travel to stations. Providing free parking discourages a shift to active travel, particularly in a context where the proportion of homes and employment in close proximity to transit stations will be increasing, according to the projections laid out in the Draft RTP. In light of this, we support the commitment in Priority Action 3.2 to “Recover the cost of parking at GO stations to help shift trips to modes that do not require parking, and allow more people to access new train services.” (Draft 2041 RTP, p. 78). However, we desire to see a clearly articulated strategy to recover the cost of parking, including proposing a fee structure for parking at GO lots, or, at minimum, a plan to offer discounted ticket prices to individuals that arrive at transit stations using active travel.

4.1.2 That there is a clear need to support GO customers to use active travel to arrive at stations, considering the projected need to decrease the percentage of drive-and-park trips from 68% in 2016 to 36-38% in 2031 (Draft 2041 RTP, p. 70). In order to support this shift, stations must be accessible, well-connected to active transportation infrastructure, and provide adequate amenities to cyclists and pedestrians. From our previous Discussion Paper submission, we reiterate: “Our report *Cycling Patterns and Potential in the Greater Toronto and Hamilton Area* (Mitra, Smith Lea, et al, 2016), found 43% of GO transit riders drive to/from stations, even though 66% of them lived within 5 km of a station (an easy bike ride). Our research also found that some GO stations have a very high potential for a shift from car trips to cycling for access and egress trips; one in five (22%) of transit access/egress trips relating to the use of GO Transit could potentially be cycled. Our report provides a methodology that Metrolinx can use to identify high-priority station areas for strategic investment in improve cycling facilities.”

We recommend that improved access for active travel to GO stations be provided, with an immediate focus on those stations with the highest potential for walking and cycling.

- 4.2 We support the focus on embedding design excellence and universal access principles into transportation planning. Inviting, accessible, and attractive transit stops and stations will support people to confidently and safely choose active transportation for their first- and last-mile trips.
- 4.3 We applaud the inclusion of a "Vision Zero" approach as a Priority Action (3.6: Eliminate transportation fatalities and serious injuries as part of a regional "Vision Zero" program). Vision Zero is an important public safety framework, and is a moral imperative of transportation planning.
- 4.4 We are in agreement that Metrolinx should work to make Transportation Demand Management (TDM) a priority (Priority Action 3.7). However, we note the lack of workplace walking and cycling initiatives in your proposed TDM strategies. A well-rounded TDM strategy recognizes the viability of active transportation and/or multi-modal transportation as a workplace transportation option. The Draft 2041 RTP only focuses on TDM strategies related to, "vanpooling, high occupancy vehicle lanes, shifting the time of travel, telecommuting and park-and-ride" (Draft 2041 RTP, p. 73). This is a missed opportunity, and we are discouraged by the lack of active transportation in your re-invention of TDM.
- 4.5 We are in agreement that integration between road and transit planning operations is essential to optimize the system (Priority Action 3.9). You suggest that "Within each municipality and where municipal and provincial roads interface, create formal task forces or groups to coordinate the planning and operations of *transit, roads and on-street parking*" (Draft 2041 RTP, p. 79). Recognizing that active transportation is a critical component of both road and transit planning, we request that you include the coordination of active transportation planning in this priority action. Specifically, we suggest that Metrolinx establish a regional committee dedicated to active transportation infrastructure planning and implementation, as previously recommended by TCAT in the report "The Other 25%: The Big Move & Active Transportation Investment" (Craig, 2013).

5. Responses to Strategy 4: Integrate Land Use and Transportation

- 5.1 We are in agreement that "as the transportation system expands, there is a great opportunity to create more complete and connected communities that are supportive of transit, walking and cycling." (Draft 2041 RTP, p. 82). Metrolinx acknowledges that planning and development around transit stations should involve provincial and municipal stakeholders, along with transit agencies and the private sector. However, we also feel that GTHA residents and transit users must be engaged in a meaningful, ongoing way in planning and development processes. Over the past three years, TCAT has worked to develop a participatory planning approach through a project called Active Neighbourhoods. This approach blends expert knowledge with local knowledge and lived experience, resulting in a more

holistic understanding of public space and transportation use, which helps to determine planning priorities in a proactive way. We encourage the application of this approach, or a similar robust and ongoing engagement approach, in land use and transportation planning and decision-making.

- 5.2 We are in support of advancing the system of connected Mobility Hubs, and applying Metrolinx's 2011 *Mobility Hub Guidelines* (Priority Action 4.3). Our 2016 report, *Cycling Patterns and Potential in the Greater Toronto and Hamilton Area*, also provides a methodology that Metrolinx can apply to identify high-priority stations and Mobility Hubs for investment in cycling infrastructure. We recommend that this methodology be applied to provide improved access to stations with the highest potential cycling mode share.
- 5.3 We support the planning and design of communities consistent with Ontario's passenger transportation hierarchy (Priority Action 4.5). In particular, we applaud Metrolinx' inclusion of a Complete Streets approach to infrastructure project delivery. A Complete Streets approach is an important component of making streets that are safe, accessible, and inviting for all road users, including the most vulnerable users. Additionally, we support the action to develop shared investment criteria in cycling facilities consistent with regional and local plans.
- 5.4 We support the completion of a regional commuter cycling network (Priority Action 4.6), and are in agreement with the principles outlined in Figure 30 of the Draft 2041 RTP. However, the Draft 2041 RTP does not provide a clear pathway for the funding and implementation of this network, and we would like to see a clearer strategy to ensure the development of this network. This strategy should include designated staff and dedicated funding to achieve regional coordination in the development of the cycling network.
- 5.5 In addition to developing a regional cycling network, we recommend that Metrolinx develop a plan for how to make walking a more viable transportation option across the region, with a particular emphasis on prioritizing pedestrian access to transit stations and stops. While integrating land use and transportation will increase the walkability of our region, land use alone will not adequately address the needs of pedestrians. Safe, attractive, accessible, and well-connected pedestrian infrastructure is necessary to support safe pedestrian travel.
- 5.6 We are in agreement that our region must rethink the future of parking (Priority Action 4.8). In addition to the strategies outlined in in Priority Action 4.8, we reiterate our recommendation (in 4.1.1, above) that Metrolinx implement a pricing and cost recovery scheme for parking at Metrolinx-owned parking lots.
- 5.7 We support the Draft 2041 RTP goal to shift school travel modes, with a goal of 60% of students walking or cycling to school by 2041. Supporting active school travel will enhance the health and safety of our young people. Collaborative, cross-sectoral programs, as articulated in Priority Action 4.9, are one way to shift school travel modes, but the development of supportive infrastructure around schools is of equal importance. We reiterate from our previous comments: "In the US for example,

policy emphasis on capital investment in improved sidewalks and cycling facilities (through the Safe Routes to School programs) have produced positive results. Unfortunately, sustainable funding aimed at improved active transportation environments near school locations are absent in the proposed RTP." Additionally, we reiterate data from our research, which shows that a broader focus on the daily mobility of children and youth is necessary to address the health and well-being of young people. "Our research (Mitra, Smith Lea et al, 2016) suggests that three-fourths (74%) of all trips by 11-16 years olds are less than 3 km in length, and also determined that at least 27.5% of trips to school or work by 11-16 year olds can potentially be cycled. It appears that other than for trips to/from school, the importance of active transportation to a child's other daily activities are not adequately emphasized in the proposed RTP."

6. Responses to Strategy 5: Prepare for an Uncertain Future

- 6.1 As emerging mobility options—such as shared mobility and autonomous vehicles—become more integrated into the fabric of our transportation system, it is important to prepare for, and proceed with caution in, embracing these technologies. Strategies to incorporate new mobility should occur in a manner that supports increased transit and active transportation mode share, and continues to support regional progress in reducing trips made by motor vehicles. Keeping these focuses at the core of policy development and implementation will allow our region to develop greater climate resiliency, air quality, and health.

7. Additional Considerations

- 7.1 We are pleased to see implementation projections that result in increases in a doubling of active trips (+640,000) and active mode share (+2.1 percentage points) in the Draft 2041 RTP (Table 1: Draft RTP Deliverables and Outcomes). However, our research demonstrates that even more pronounced mode shifts are achievable within the GTHA. Our research (Mitra, Smith Lea et al, 2016) found that one-third of all trips in the GTHA are potentially cyclable trips. More than half (53%) of these are short trips, between 1 and 3 km in length. We also found that there is very little geographical variation for these short trips; all regional municipalities produce very high volumes of short trips that could potentially be cycled. More aggressive mode-shift targets, coupled with increased capital investment in Active Transportation infrastructure, will allow these predicted mode shifts to occur on schedule.
- 7.2 As noted in our previous comments, we reiterate that a missing issue in the Draft 2041 RTP is an analysis of gender and its impact on transportation and health equity: "Our research (Mitra, Smith Lea et al, 2016) found that less than 30% of cyclists in the GTHA are female. We also found that considerable geographical variability exists. For example, women constitute less than 20% of all cyclists in Durham, York, Peel and Halton, compared to 33% in Toronto." Cycling is a healthy, economical, and environmentally sustainable transportation mode, and yet women disproportionately face barriers to choosing this mode. There is a policy and

planning imperative to understand and address this gender gap, which could potentially have significant impacts on health equity and travel behavior.

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

Sincerely,

A handwritten signature in blue ink that reads "Nancy Smith Lea". The signature is written in a cursive style with a large initial 'N'.

Nancy Smith Lea, Director
Toronto Centre for Active Transportation,
Clean Air Partnership

A handwritten signature in blue ink that reads "Raktim Mitra". The signature is written in a cursive style with a large initial 'R' and a long, sweeping underline.

Dr. Raktim Mitra, Assistant Professor
School of Urban and Regional Planning,
Ryerson University