

December 23rd, 2017

Ministry of Transportation

Transportation Planning Branch

777 Bay Street, Toronto, ON

M7A 2J8

**Re: Response to the Greater Golden Horseshoe
Transportation Plan (EBR # 013-1515)**

Dear Katerina Minaeva,

We, the undersigned, would like to provide three overarching recommendations in response to the GGH Transportation Plan's Draft Goals and Objectives:

Ensure adequate investment in transportation.

It is important that transportation plans are supported with strong funding commitments. Move the GTHA, a multi-stakeholder collaborative consisting of business, health, labour and environmental and citizen organizations, has joined together to call for long-term dedicated funding for an efficient, accessible, affordable and fully integrated regional transportation system.¹ The collaborative has established five shared principles for establishing revenue tools:

- Dedicated: Revenues should be dedicated to transportation infrastructure and operations and not go into the general tax pool or be diverted to other priorities.

¹ <http://movethegtha.com/>

- Efficient: Governments should demonstrate that they're spending the public's money wisely and getting the best possible value when investing in our regional transportation system.
- Transparent and Accountable: Governments should be clear and open when deciding which projects to fund, demonstrating how they're spending our money, and reporting on project results.
- Fair and equitable: Costs should be distributed among everyone who benefits, either directly or indirectly. The impacts of any new costs for transportation expansion should be distributed as equitably as possible and not increase the burden on people with lower incomes.
- Sustainable: Funding must be stable and consistent over the long term.

We recommend that these principles are reflected throughout the goals and objectives of the GGH Transportation Plan.

Coordinate with existing planning policy

It is essential that the GGH Transportation Plan goals and objectives recognize the importance of alignment with existing planning policies at both the provincial and municipal level, including the Regional Transportation Plan, Growth Plans and local official plans. In particular, the plan should work in tandem with the Growth Plan, providing transportation solutions and infrastructure to areas of intensification designated in the Growth Plan.

Recognition of the interlinkages of transportation and climate change

Transportation is the largest contributor to Ontario's greenhouse gas (GHG) emissions. It is therefore critical that the goals and objectives of the GGH Transportation Plan reflect the Province's existing GHG emissions reduction targets,

and that the plan itself identifies how it will contribute to GHG emissions reductions throughout the transportation system.

Below, please find our detailed responses to your questions related to the draft goals and objectives for the GGH Transportation Plan.

QUESTION 1: Taken together, how well do the goals reflect what's important to you for the future transportation system in the GGH?

We support the goals and objectives outlined in the GGH Transportation Plan. However, the importance of successful implementation and operationalization of these goals and objectives cannot be underestimated.

QUESTION 2: Would you change any of the existing goals or add any new goals? If so, what would you change/add?

Healthy

Transportation systems can have a significant impact on public health by affecting regional and local air quality, levels of physical activity, the number of vehicle-related injuries and deaths as well as mental health.

We believe that the transportation system should support public health through promoting active transportation and minimizing the harmful effects of air pollution. It has been estimated that physical inactivity and obesity in the GTHA cost \$4 billion

per year in health related costs while air pollution contributes to over \$4.6 billion in health related costs per year.²

However, a well-planned transportation system can mitigate these serious health impacts and their associated costs. For example, research has shown that a 9.8% increase in transit use and a 5% increase in active transportation to school or work could prevent 184 premature deaths per year by increasing physical activity and 150 premature deaths and 90 hospital admissions per year by improving air quality. These benefits were valued at \$2.2 billion per year based on 2014 population estimates.³ The GGH Transportation Plan can reduce these negative outcomes through implementing objectives that support active transportation connections and discourage more highly-polluting models of travel.

While Ontario experiences some of the lowest levels of transportation-related deaths and injuries in Canada, more progress is needed to ensure that our mobility system is as safe as possible for all modes of transportation.⁴ The GGH Transportation Plan should prioritize this goal, and commit to tracking and measuring the Province's progress toward it. As outlined in the Transportation Profile by the Ministry of Transportation, the City of Toronto has adopted a Vision Zero Road Safety Plan to reduce road related injuries and deaths.⁵ We encourage the Province to adopt the Vision Zero philosophy when moving forward with the GGH Transportation Plan.⁶

² <https://www.toronto.ca/legdocs/mmis/2014/hl/bgrd/backgroundfile-69503.pdf>

³ <https://www.toronto.ca/legdocs/mmis/2014/hl/bgrd/backgroundfile-69503.pdf>

⁴ https://www.tc.gc.ca/media/documents/roadsafety/Canadian_Motor_Vehicle_Traffic_Collision_Statistics_2015-EN.pdf

⁵ https://www.gghtransport2051.ca/wp-content/uploads/sites/18/2017/07/Transportation-Profile_Executive-Summary_October2017-1.pdf

⁶ https://www.toronto.ca/wp-content/uploads/2017/11/990f-2017-Vision-Zero-Road-Safety-Plan_June1.pdf

Additionally, we believe the GGH Transportation Plan should acknowledge and account for the mental health impacts of commutes. As numerous studies have concluded, long commutes or commutes that involve unpredictability or overcrowding can result in significant negative mental health impacts including increased mental stress, poor sleep quality and exhaustion.⁷ These too result in negative impacts on citizens' quality of life and generate significant costs for the provincial health system.

We recommend the following changes to the objectives:

- *The transportation system supports, encourages and fosters transit use and active modes of transportation to increase levels of physical activity and decrease air pollution to improve human health and decrease health care costs.*
- *The transportation system minimizes the number and severity of vehicle-related collisions, injuries, and deaths by encouraging safe modes of transportation, and applying a vision zero philosophy to the design and development of all modes of transportation.*
- *The transportation system minimizes stress and other negative mental health effects associated with congestion and long commute times.*

Equitable

A key component of providing equitable access to transit is ensuring that the system will allow individuals to access goods and services that they regularly need. We

⁷ <https://www.citylab.com/transportation/2011/11/your-commute-slowly-killing-you/426/>

recommend expanding the objective to include grocery and drug stores in addition to colleges and hospitals.

We recommend the following changes to the objectives:

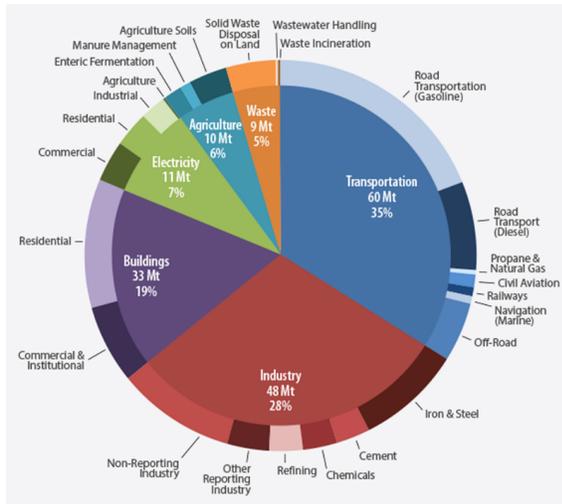
- The transportation systems provides efficient access to services such as colleges, schools ~~and~~ hospitals, grocery and drug stores

Environmentally Sustainable

The GGH Transportation Plan should align with the existing climate commitments made by the Province, including the targets outlined in the Climate Change Action Plan: GHG emissions reductions of 15% below 1990 levels by 2020, 37% by 2030 and 80% by 2050.⁸ Transportation, especially road transportation, contributes a significant portion of the Province's total GHG emissions. Therefore, it is important that the GGH Transportation Plan includes explicit reduction targets in its objectives that align with Ontario's existing GHG reduction commitments.⁹ Furthermore, the Plan should include robust measures for monitoring its impact on GHG emissions and air quality.

⁸ <https://www.ontario.ca/page/climate-change-action-plan>

⁹ <https://www.ontario.ca/page/climate-change-strategy>



Additionally, it is important that the GGH Transportation Plan promote a planning approach that allows individuals to make more sustainable transportation choices. One key way to achieve this is to limit the development of sprawling suburban single family home neighbourhoods in areas that are devoid of existing public transit infrastructure, and instead to concentrate development around existing transit hubs and walkable neighbourhoods. The Province's most recent Growth Plan recognizes this relationship between planning policy and climate change mitigation, advocating for growth to occur within existing urban growth areas and around transit corridors.¹⁰

In addition to smart planning, financial incentives are also needed to support individuals in making sustainable transportation decisions. For example, pricing signals such as congestion charges (Stockholm)¹¹, road pricing (Singapore)¹², and

¹⁰ <http://placestogrow.ca/images/pdfs/ggh2017/en/growth%20plan%20%282017%29.pdf>

¹¹ <https://www.citylab.com/transportation/2012/12/traffic-jams-solved/4160/>

¹² <http://development.asia/case-study/case-electronic-road-pricing>

parking levies (Nottingham)¹³ have experienced significant success in other jurisdictions

We recommend the following changes to the objectives:

- The transportation system supports reduced energy use and reductions in greenhouse gas emissions in line with the Province's carbon reduction commitments
- GHG and air pollution emissions from the transportation system are monitored regularly to track progress against provincial commitments.
- The transportation system supports the efficient development of land and minimizes sprawl

Economically Responsible

The goals and objectives of the GGH Transportation Plan must commit to securing new, sustainable and dedicated revenues. We are deeply concerned about the shortfall in available funding to support the development of new transportation projects as well as the operation and maintenance of existing infrastructure. According to a recent study by Transport Action Ontario, there exists a \$2.4 billion/year funding gap for the construction, operation and maintenance of the rapid transit network cited in the 2041 Draft Regional Transportation Plan (RTP) by Metrolinx.¹⁴ However, the RTP proposes no new funding sources to pay for these

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https://www.researchgate.net/publication/318767555_Evaluating_the_impact_of_a_workplace_parking_levy_on_local_traffic_congestion_The_case_of_Nottingham_UK

¹⁴ <http://ontario.transportaction.ca/wp-content/uploads/2017/12/TAO-GapUpdate2017-12.pdf>

projects.¹⁵ If the Province is going to follow through with its ambitious transportation plans, then revenue tools need to be identified and allocated to realize them.

Furthermore, given the extent of public funds involved in the development of transportation infrastructure, it is important that investment decisions are based on sound cost benefit analysis that considers a variety of factors, and that this analysis is transparent to the public.

We recommend the following changes to the objectives:

- New, sustainable and dedicated revenue tools are generated to build, operate and maintain the transit system we need
- A full range of costs and benefits are transparently considered in the decision-making process related to when-making transportation investments (e.g., number of people served, physical and mental health impacts, economic competitiveness, costs of congestion, social equity, environmental impacts, etc.)

Integrated

When moving forward with the development of new transportation projects, it is important that these initiatives are tied with local land use planning policies. We support densification around existing transit stations and coordinating active transportation and shared mobility options as last mile solutions for public transit infrastructure.

¹⁵ <https://www.metrolinxengage.com/en/collections/draft-plan>

With the rise of the sharing economy and the availability of real-time data through app-based technologies, the government should support shared mobility solutions that complement, rather than compete with, existing transit services.

Implementing transportation demand management (TDM) techniques is another way to support a stronger transportation system. Metrolinx has made commitments to enhance its sustainable commuting program, Smart Commute, in its RTP.¹⁶ The GGH Transportation Plan should recognize the importance of initiatives such as these and encourage further investment in TDM programs.

Finally, integrated transit solutions to support the movement of goods across the Province needs to be prioritized through the creation of a Strategic Goods Movement Network and coordination with existing zoning/land use policy.

We recommend the following changes to the objectives:

- Transit services are supported by appropriate densities of people and jobs (e.g., areas with large populations are served by rapid transit like light rail or subways) and transit investment decisions are tied closely to existing and planned densities
- New forms of mobility are designed to complement, rather than compete with, existing transit services
- The transportation system makes use of travel demand management tools to reduce and redistribute travel demand wherever possible to increase the efficiency of the network.

¹⁶ <https://www.metrolinxengage.com/en/collections/draft-plan>

- Major goods movement related industries are supported by a [Strategic Goods Movement Network](#), and an efficient multi-modal system of roads, rail, ports and airports.
- [Industries involving significant goods movement are planned in coordination with freight-intensive land uses, such as major employment zones.](#)

Connected

Connecting people to opportunities and efficiently moving goods through the region is the primary role of the transportation system. The GGH Transportation Plan has to balance the needs and requirements of different transportation users like shippers, transit users, cyclists, pedestrians and drivers. Sometimes trade-offs will have to be made.

We recommend the following changes to the objectives:

- It is easy to travel across the region by transit, and connections, [fares and payments](#) between transit systems are seamless.
- [The transportation system makes alternative transportation modes \(e.g. transit, cycling, walking\) viable and competitive with car trips.](#)

New Goal: Accountable

Transparent and accountable governance is a critical success factor for the development and operation of successful transportation systems.¹⁷ Given the regional nature of the transportation system in the GGH, numerous government and quasi-government bodies are involved in its coordination. It is therefore essential

¹⁷ https://www.bot.com/portals/0/unsecure/advocacy/2014_TRBOT_BuildRegionalTransportation.pdf

that the decision-making process is transparent to the public, and that it is clear which government body is responsible for the different parts of the transportation system. Furthermore, for areas where there is geographic or thematic overlap between policies, there should be clarity regarding which plan should be prioritized.

We recommend the following changes to the objectives:

- There is clear decision-making accountability between the various levels of government.
- Governance mechanisms support effective and transparent decision-making.
- Municipalities have the tools and support to successfully implement local components of regional transportation plans.
- Business case and cost benefit analyses are conducted in a consistent manner and made available to the public along with the input data and rationale use to arrive at a decision.

QUESTION 3: Which goals do you think are the most important for a well-planned transportation network?

There is no need to choose between these goals; when implemented effectively, they can be mutually supportive.

QUESTION 4: Under each goal, which objectives are most important for a transportation system that achieves that goal?

Healthy

The transportation system supports, encourages and fosters transit use and active modes of transportation to increase levels of physical activity and decrease air pollution to improve human health and decrease health care costs.

Equitable

Reliable and frequent transit services can be accessed by all users regardless of age, income, ability, or location.

Environmentally Sustainable

The transportation system supports reduced energy use and reductions in greenhouse gas and air pollution emissions.

Economically Responsible

A full range of costs and benefits are transparently considered in the decision-making process related to transportation investments (e.g., physical and mental health impacts, economic competitiveness, costs of congestion, social equity, environmental impacts, etc.)

Resilient

The transportation system supports and makes use of digital connectivity, big data and new technology.

Prosperous

Congestion is reduced, enabling people to accomplish more because they spend less time on travel.

Integrated

Transit services are supported by appropriate densities of people and jobs (e.g., areas with large populations are served by rapid transit like light rail or subways) and transit investment decisions are tied closely to existing and planned densities.

Connected

People and goods are able to move efficiently with minimal delay.

We appreciate the opportunity to provide feedback on this important policy to support sustainable transportation policy. Please don't hesitate to contact us directly should you have any questions.

Sincerely,

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