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November 12, 2008

Dear Mr. MacIsaac:

Comments on Draft Regional Transportation Plan and Investment Strategy

The following is a submission from Transport 2000 Ontario and Shift Ontario on the draft Regional Transportation Plan (RTP) and draft Investment Strategy (IS) reports issued by Metrolinx for comments.

As you know, our organizations commented extensively on your Green and White Papers. We are pleased to offer comments on these documents also. On balance, there is much to admire about the RTP and IS, in particular the statement of goals and the outlining of the modern practices of achieving a transit-oriented GTAH. However, we do have three significant concerns related to:

- Metrolinx assumption that four 400 series highway extensions and 4600 lane-km of regional road widening and extension projects will proceed without updated demand or benefits analysis, as is required for rapid transit projects. This assumption immediately removes billions of dollars that could potentially be invested in public transit, and causes the RTP to fail to achieve any GHG emission reduction.
- Absence of any "Quick Win" projects for Goods movement
- Absence of preliminary discussion on future long-term funding instruments

A. About Transport 2000 Ontario and Shift Ontario

Transport 2000 Ontario is a non-profit public advocacy organization supported entirely by our membership. We promote environmental, economic and socially sustainable transportation. Incorporated in 1992, we have functioned as an advocate for sustainable transportation since the 1970's. Transport 2000 Ontario is one of five regional organizations across Canada with a national office in Ottawa.

Shift Ontario (**S**top **H**ighways - **I**nvest in **F**eet and **T**ransit), formerly known as the Sustainable Transportation Coalition (STC), is an alliance of organizations working to redirect funds from unsustainable transportation infrastructure, specifically roads and highways, towards the sustainable modes of public transit, walking and cycling. Members of Shift Ontario are:

| | |
|---------------------------------|---|
| Ontario Smart Growth Network | Preservation of Agricultural Lands Society |
| Transport 2000 Ontario | Preserve 16th (Markham) |
| Earthroots | Citizens Opposed to Paving the Escarpment |
| Friends of the Farewell | Protect our Water and Environmental Resources |
| Citizens Environmental Alliance | Rouge Duffins Greenspace Coalition |
| GreenTrans | Coalition on the Niagara Escarpment |

B. Comments on Draft Regional Transportation Plan (RTP)

This is a well written document. *Where we have not commented on a specific Strategic Direction or Action, this means we are in general agreement with it and have no comments to add.*

Strategic Directions and Priority Actions

SD#1 Build a Comprehensive Regional Transit Network

-We are in complete agreement with the overall approach, namely planning a network of commuter regional rail integrated with LRT/BRT and local transit. We also agree with the approach of progressively converting these regional rail services to express rail.

-While the report characterizes express rail as "typically" electrified, there is no explicit commitment to a program of electrification for regional rail. Electrification is the world's standard for regional rail networks and pays big dividends in achieving faster and more frequent train service and in energy savings.

-We need to understand the basis for your assumption of subway average speeds of 40 km/hr. TTC uses 32 km/hr in their Transit City references.

-We have a number of specific comments on specific lines/corridors

- We note that there is a possible error in Fig 5. The 407 Transitway is a key link in the future network. The Backgrounder Modeling report indicates in Table 2 that it was modeled at 80 km/hr (i.e. express rail speeds) but Appendix C states 25-30 km/hr. It seems to us that the former (80 km/hr) is correct. In this case, Fig 5 should display this line as an express rail line. This is important, because E-W express services in the north GTA are badly needed.
- We support the concept that multiple rapid transit lines are needed to Pearson Airport, including an express rail service, presumably run by GO Transit. As you know, a premium-priced, limited-stop, privately operated service taking 22 minutes from downtown and running every 20 minutes has also been proposed. In view of the finite capacity of this rail corridor, we do not see value in this service versus regular GO express rail service taking perhaps 30 minutes.
- We are pleased that a broad range of alternative routes and technologies are being studied in the Benefits Case Analysis (BCA) for Sheppard/Finch corridor. Our feeling is that one technology, likely LRT, should be chosen for the entire line, to avoid the disincentive of a transfer.
- We are also pleased that a broad range of options for the SRT route and technology (existing vs. LRT) are being studied in the BCA.
- We note that a second international airport, Pickering Airport, is assumed to be constructed sometime in the first 15 years. Transport 2000 has long been on record as opposing this airport. The increased capacity for air travel is not needed, especially now with oil depletion on the horizon.

-We believe that study is needed to better utilize the existing heavy rail network to cost-effectively improve the regional rail transit network. At least three approaches exist:

(a) Build new junctions between lines, such as:

- between CN York and CP Belleville subs near their crossing NE of Zoo
- between GO Uxbridge sub and CP North Toronto sub near their crossing at Kennedy/401
- between southbound Stouffville GO line and eastbound CN York sub near GO Unionville station
- between CN Bala sub (aka Richmond Hill line) and CP Belleville sub near their crossing at DVP/Wynford

(b) Through land acquisition, protect long-term future possible junction alternatives where rail-lines cross or come together, such as a west to north connection between CN Georgetown and CP Bolton subs

(c) Explore acquisition of more corridors or parts of corridors. For example, construct a new freight corridor north of Toronto to allow acquisition of various CP subs in the Toronto area.

-We believe that various small "connection improvement opportunities" in the network exist and can be promptly constructed, including:

- Dundas West subway station/Bloor GO station - currently very inconvenient transfer
- Leslie subway station/Oriole GO station - relocate GO station to make interchange practical
- Main St. subway station/Danforth GO station - extend u/g passageway at GO station to subway mezzanine
- Hurontario corridor/Cooksville GO station - improve interface with Mississauga Transit

-We support the proposals within Actions 1.6 to 1.11, particularly:

- Requiring transit priority road measures and transit supportive land uses to be in place as a condition of transit funding
- Providing funding priority to projects that maximize the use of existing road infrastructure and minimize the need for road extensions and widenings. The Lisbon Intermittent Bus Lane concept (Green Paper #7, pg 11) makes sense for narrow arterial roads
- Compatible transit vehicles and technologies across the region
- Bus Bypass shoulders
- Dial-a-Bus in low density/off-peak areas

-We believe that electric trolley buses should be considered for higher capacity local routes, as discussed in the STC submission on the Green Papers. As we learned at Markham's recent Transit Vision meeting, Vancouver's experience has been positive - lower fumes, noise, very high citizen acceptance and a more livable city.

SD#2 Promote Active Transportation

-The objectives in this SD are laudable. However, resources should be set aside to develop and implement a social marketing and education campaign to promote this direction.

-Although we support the concept of bicycle lanes on mixed use streets, many cyclists still have the perception that this is not safe. Municipalities should maximize off-road bicycle lanes (trailways, protected lanes), as is done in New York City.

-There are too few crossing lights on many arterial roads. Leslie Street in Toronto is an example. Pedestrians often have to walk several long blocks to reach a crossing light on an arterial road. More pedestrian activated crossing lights are needed.

SD#3 Improve the Efficiency of the Road and Highway Network

-We need to move away from expansion and extension of 400 series highways unless definitively justified by up-to-date modeling followed by a comprehensive Benefits Analysis. Some of the MTO highway projects (e.g. 407 extension) are based on out-dated modeling work that is inconsistent with Metrolinx assumptions. For example, the MTO assumptions for the 407 on the degree of telecommuting, and the degree of car pooling were much lower than assumed by Metrolinx, leading to a bias favouring single-passenger automobiles. The Benefits Analysis needs to include social costs of highways, such as cost of accidents, costs of human health impairment from passive transportation, and costs from sprawl inducement.

-Similarly, analysis and benefits testing of regional road widening and extension projects should be conducted in a format consistent with the Metrolinx approach.

-These Benefits Analyses must be based on the built-out express rail network and a future modal shift of trucks and containers to rail (i.e. relatively stable number of drivers on the road and decreased use of highways for trucking). We believe there will be a shift in goods movement patterns in the future from truck to rail, generated by higher fuel costs and by likely increases in the capacity of railways to move truck trailers and containers by train.

-We support the concept of a network of transit/HOV lanes on highways and arterial roads, using existing lanes, shoulders and potentially new lanes. However, 4-lane arterial roads through residential areas should not be widened to 6 lanes, even if intended for transit/HOV, as the social costs are too high. Instead, consider solutions like the Intermittent Bus Lane.

-We support the concept of Park and Ride lots aligned with HOV and BRT networks (Action 3.10)

SD#6 Create a Customer-First Transportation System

-It is important that we create a public transit system that is a high quality consumer service (not just a lowest-cost public good) to improve usage by people with a choice of modes.

-In addition to Actions 6.1 to 6.10, local transit agencies should phase in software to reduce missed connections between bus routes. With GPS bus positioning technology now available, buses on different routes can "talk to each other" and thus coordinate arrivals/departures at intersecting locations. This would reduce the problem of "I just missed my transfer by one minute", especially in the GTHA fringes where bus service is less frequent.

SD#7 Implement an Integrated Transit Fare System

-Since the cost of transit varies among the GTHA municipalities, creating a single fare system will be difficult and will take time. For example, in Montreal, fare integration took a number of years to finalize. As is implied by Actions 7.1 and 7.2, Metrolinx should first aim for an integrated fare system, based on a simple zone fare structure as in Montreal, before any implementation of smart-card technology (e.g. Presto)

SD#8 Build Communities that are Pedestrian, Cycling and Transit-Supportive

-We strongly support this concept. The current suburban form renders transit-supportive communities almost impossible.

-New communities need to be built with collector roads that are through streets, to facilitate local transit.

-Create pedestrian malls in established communities having a downtown.

-We agree with Action 8.6, where municipal parking and zoning bylaws would be revised to reduce parking requirements.

-The Development Charge system should be reviewed by the Province to see if revisions could assist in meeting SD#8. Then municipalities should be trained on new approaches. For example, can development charges be lower on buildings with lower number of parking spaces? Can the development charge structure be changed to stop subsidizing sprawl? How can area-specific development charges be used?

SD#9 Develop a System of Mobility Hubs

-We strongly support this concept and the fact that hubs need to be destinations in their own right.

-We strongly support Action 9.5 (financial program) to fund such items as converting surface parking to structured parking and purchasing land when available (strategic acquisitions). We also support Action 9.6 (guideline to exploit financial and development tools).

-In the long run, land in the hubs is much too valuable to be covered with parking lots. However, we understand and support the concept of interim land use, such as parking lots or big box stores, while market demand catches up. It is important that inappropriate non-interim uses be avoided, such as cemeteries, large parks or low density residential.

-Action 9.8 (Pearson Airport) - see our comments under SD#1.

SD#13 Improve Goods Movement within the GTHA and with Adjacent Regions

-We agree with Metrolinx that more work is needed, promptly, in this important area. We support the idea that a working group (or "roundtable, per Action 13.2) should be established with industry to examine and develop projects. In addition to the organizations mentioned in Action 13.2, the Railroad Association of Canada (RAC) can play a part. Project ideas include:

- Research to understand goods origins, goods destinations, average truck load factors, and how to increase
- Research to understand where the pinch points are - are they on local roads, arterial roads or highways?
- Research to demonstrate how rail roads can be better utilized for medium and long-distance movement of truck trailers and containers
- Preserve/upgrade existing rail corridors to expand intermodal shipments
- Build new shared rail corridors across GTA, as identified in Green Paper #5. For example, Los Angeles built a very long sunken trench for freight trains between Long Beach container port and downtown Los Angeles called the Alameda Corridor.
- Provide infrastructure for short-line railroads.
- Get involved with High Speed Rail (QU-Windsor) project team. There is growing momentum for this project
- Test barrier-separated managed lanes on highways
- Dedicated truck-only two lane highway
- Explore marine transportation (containers)
- Develop urban logistics centres
- Provide incentives for intermodal transport
- Provide incentives for non peak time travel

-We believe that this working group should move quickly and boldly, i.e. strive for some "Quick Win" projects.

SD#15 Develop an Investment Strategy to Ensure Sustainable Funding for Transportation Infrastructure and Supporting Program

-Action 15.1 (Investment Strategy) - see comments below (Section C)

-Action 15.2 (Benefits Case Analysis) is currently limited to transit projects. Per our comments under SD#3, a BCA should also be carried out for highway expansion/extension projects and regional road widening and extension projects exceeding predefined thresholds.

Results

-The Backgrounder on Modeling indicates that per capita annual GHG emissions from auto transport are 2.3 tonnes today and 1.6 tonnes in RTP case. Most of this improvement is due to improvements in vehicle efficiency and lower carbon fuels. However, because of population increase in the GTHA, there is virtually no change in total auto emissions 2006 vs. 2033 RTP. In order to meet Ontario's Action Plan on Climate Change, Metrolinx has resorted, in their Backgrounder on Climate Change and Energy Conservation, to prayerfully hoping that a "tipping point effect", resulting from the Growth Plan land use framework, transit investment and changing attitudes "could result in more dramatic changes in behaviour, which transportation models cannot accurately predict". It is extremely unfortunate that Metrolinx did not attempt to push the envelope and scope out a RTP, even if hypothetical, that gave a meaningful reduction in GHG emissions.

- It is very unfortunate that Metrolinx treats the extensions of Highways 404, 407, 410 and 427, as well as construction of 4600 lane-km of regional road widenings or extensions, as a "given". The capital cost of the 400 series projects is stated at \$5B. Similarly, an estimate of \$1M/km of regional road widening results in an additional \$5B for regional roads. As discussed earlier, these projects should be subject to updated modeling and a BCA. Reducing the roads program would have significant benefits in GHG emission reduction, and free up more dollars for public transit projects.

- It is correctly pointed out that the \$50B capital costs + \$2B annual do not include local transit or regional bus services, although these services would have to increase. Local transit agencies may incur poor cost recovery during the period that mobility hubs are being constructed.

- We also appreciate the clarification that the funding discussions do not include costs for the Spadina subway extension, AcceleRide and Mississauga Transitway projects, as these three projects are already fully funded.

RTP Implementation Matters

-We support the recommendation that the RTP and the land use directions proposed (e.g. mobility hubs, transportation corridors) be adopted in legislation, and that municipal planning and infrastructure investment decisions must be consistent with the RTP. More specificity on this topic is needed.

-We also support prescribing a process to review and amend the RTP. Clearly Metrolinx needs to monitor "developments on the ground" and adjust the RTP from time-to-time.

-There is confusion among Metrolinx's stakeholders as to what the role of Metrolinx will be. We recommend that Section 3.5 of the report be expanded.

C. Comments on Draft Investment Strategy (IS)

-We support the overall level of investment (\$50B over 25 years, not including local transit or regional roads). We appreciate that the \$11B announced by the Province under Move Ontario 2020 is a significant first step by North American and world standards.

-We support the overall approach of investing the Quick Win funds and the Move Ontario 2020 funds first, and only implementing long-term funding instruments when alternative high quality public transit is in place.

-However, the IS document should include discussion (pro/con) of other funding instruments and order-of-magnitude funds generated by each. A number of these were discussed at the Metrolinx Board meeting on June 13, 2008. Funding instruments to consider would include:

- Regional Road pricing (e.g. 407 ETR)
- High Occupancy Toll lanes (e.g. US metro areas)
- Central Area Congestion Charge (e.g. London)
- Parking Pricing
- Pay-as-you-Drive pricing on insurance fees or vehicle registration fees
- Gasoline Tax
- Sales Tax
- Payroll Tax
- Land Value uplift and capture
- Committed long-term funding from senior levels of government

- We also believe that Metrolinx cannot wait until 2013 to report on closing the 2016-2033 investment gap. Public consultation and interim reports are required well before that.

- The IS document should propose some pilot tests on road & parking pricing (e.g.: congestion pricing on one road where transit available; parking fees at mall + shoppers transit rebate to remain revenue neutral).

- Flexibility needs to be built into the capital plan, to allow for opportunistic land acquisition and infrastructure construction (e.g. during an economic downturn). Priority properties include land adjacent to mobility hubs, lands permitting pedestrian shortcuts and lands allowing heavy rail connections. An economic downturn would also be a more cost-effective time to undertake “rough-in construction” for future expansions, such as larger new stations, larger new tunnels and bridges and LRT-compatible BRT corridors.

D. Final Comments

We thank you for the opportunity to comment on these two documents and look forward to consideration of our comments. Should you require more information about our submission, please contact Peter Miasek at 905-477-8636.

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