

Jin Wang
Team Lead
System Planning Office, System Planning Branch
Ministry of Transportation
7th Floor, Suite 700
777 Bay Street
Toronto, ON M7A 2J8

August 26, 2021
Re: GGH Transportation Plan – Discussion Paper (June 2021)
Submitted via the Environmental Registry of Ontario

Dear Jin,

Thank you for continuing to include the City of Mississauga as a member of the technical advisory committee for the GGH Transportation Plan. We have the following questions and comments regarding the Discussion Paper, released on June 14, 2021. We have also included comments on the detailed Strategic Goods Movement Network, provided on July 20, 2021.

Vision, Pillars, and Actions

- 1) Overall, the goals, pillars and actions align with the City of Mississauga's Transportation Master Plan and Official Plan policies. Below, we note challenges and priorities that should be considered in addition to those included in the Discussion Paper:
 - a. There are few references to Transit Oriented Communities or MTSAs. Aligning land use planning with transportation planning is key to achieving a more sustainable and efficient transportation system. The Discussion Paper does not mention MTSAs specifically, and there is only one reference to transit oriented community opportunities (p.18-19). These are significant features of other provincial policy and statute (including the Growth Plan and the Planning Act). City of Mississauga staff recommend that these features be more prominent in the GGH Transportation Plan. In particular, there should be recognition that transit oriented communities can be planned along more than just rail-based higher order transit.
 - b. Climate change needs to be integrated into all of the goals and actions in the GGH Transportation Plan. As illustrated in “A Made-in-Ontario Environment Plan,” transportation is the largest source of GHG emissions in Ontario. That means that there needs to be a significant focus on reducing GHGs from this sector if we are to reach the province’s and the City’s climate change targets. While climate change is addressed in Goal 6 (“Future Ready”), it is important to

recognize that climate change is not a "future" issue: it is an urgent issue that is already impacting Ontario. Climate change should not be relegated to one goal, but integrated into all goals and actions. For example, as noted elsewhere, funds should not be dedicated to the expansion and development of highways, which will only encourage more cars on the road and increase GHGs. Rather, these funds should be used to manage our current highways (e.g., congestion pricing, HOV lanes; transit priority lanes), and to encourage the use of transit (e.g., transit priority signals, dedicated lanes for BRT) and active transportation (e.g., bike lanes, complete communities). Given its importance, climate change should be reflected in the Plan's Vision ("...an interconnected transportation system that provides a safe, seamless, and accessible, and low carbon transportation experience for all").

- c. The discussion paper does not include transportation affordability as an objective. Considering that transportation should be equitably distributed across the region, MTO should aim for a transit system that is not only connected but affordable and accessible for all. In general transportation equity should be a key planning rationale for this Plan.
- d. The City of Mississauga, along with the Region of Peel and other municipalities, have been advocating for a provincial Vision Zero Framework - a strategy to eliminate all traffic fatalities and injuries while increasing mobility and safety for pedestrians, cyclists, and drivers. MTO is encouraged to include this as a part of this plan.
- e. Consider including an objective related to transit comfort. Transit modes should be maintained and able to provide similar levels of comfort and quality across different modes and jurisdictions in the GGH.
- f. Consider including an objective related to health and air quality.
- g. The Discussion Paper holds that transit connections are "centred on Union Station" (p.9). Although perhaps true for rail, there are other major transit connections throughout the GGH that provide non-Union options already. For example, GO Transit's Square One Terminal is the system's second busiest bus terminal by bus movements. The challenge with delivering an "expansive grid" of transit is also tied to land use planning. It requires fostering the development of non-Downtown Toronto communities that are transit supportive. The development of additional highway corridors, as proposed in this discussion paper, can detract from these policy intents.
- h. There is a significant focus on "reducing congestion" (Page 8, Page 11, and Page 18). However, it is not certain if capacity improvements can permanently reduce traffic congestion. Through induced demand, new capacity is filled through additional traffic attracted to the new capacity. A general consensus is forming that reducing congestion by increasing capacity is not possible in a rapidly growing area, such as the GGH. Furthermore, providing more capacity on roads, by inducing demand, will increase the negative environmental impacts of vehicular use, which runs counter to the City of Mississauga's Climate Change Action Plan and the Transportation Master Plan. To achieve the City's goal of a 50% sustainable mode share by 2041, the province should focus their support on transit improvements, not road improvements or expansion. The expansion of our highway system and pushing for increased use of transit are opposing ideas. The focus needs to be on improving current highways and their function, and not on expanding them.

- i. Related to the point above, our Council has unanimously voted under [Resolution 0033-2021](#) to be strongly opposed to any and all advanced construction associated with preparations for a GTA West Highway and Transmission Corridor which would cause environmental damage, encourage residential sprawl and dependence on the car as a significant means of transportation.
- j. A Vision for Mobility in 2051 –Increasing the frequency of local transit services (page 9): This statement is too generic and does not take into account the transit operating environment. Increasing the frequency of transit is dependent on many external factors including, but not limited to: ridership demand, funding, supporting transit infrastructure, fleet availability. In order to provide higher frequencies, we also need dedicated bus infrastructure as congestion on roadways may counteract the benefit of increased frequencies.
- k. A Vision for Mobility in 2051 – Ensuring 24-hour public transportation access (page 9): All local transit decisions must be made with proper data and analysis of the demand. 24 hour service can be useful in many areas but blanket 24 hour local transit service across the GGH is not feasible in many areas and would be very costly.
- l. Sample Actions Planned & Underway – Building new transit and stations in highly urban areas (page 17): Investments in BRTs and transit priority measures (transit signal priority, queue jump lanes, etc.) are also required to achieve transit connectivity and keep transit a competitive transportation option within cities and connecting communities in addition to higher order transit initiatives. These "transit enhancements" may include road diets to implement BRTs by retrofitting existing rights-of-way to accommodate dedicated bus infrastructure and invest in new technology for transit signal priority.
- m. Sample Actions Planned & Underway - Giving Users More Choice (page 21) should include additional options for active transportation (i.e., more than just cycling). The action should also go beyond improving linkages and should consider appropriate amenities at destination facilities to facilitate active transportation.
- n. Sample Actions Planned & Underway - Keep Goods Moving (page 23) should include support for a broad range of last mile delivery options, which are particularly relevant in urban areas. Last mile delivery options might include e-cargo bike delivery, microhubs, and lockers.
- o. Sample Actions Planned & Underway - Keep Goods Moving (page 23) should include support for expanded rail transport.
- p. Sample Actions Planned & Underway - Safe and Inclusive (page 25) should include an action aligned with the existing action in A Made-in-Ontario Environment Plan to undertake an impact and vulnerability assessment of the transportation sector.

Network Planning and Protection

- 2) How should the City incorporate the GGH Transportation Plan through our official documents, such as our Official Plan? What are the expectations at the municipal level? Do we need to protect and plan for corridors identified in this plan? It would be helpful if the plan could provide direction on how the City should be planning for specific features.

Staff have the following questions regarding identified transit corridors and initiatives and those shown in this Discussion Paper:

- a. How should we be planning or protecting for “Conceptual Transit Hubs” (Map 1, p.10) in Mississauga?).
- b. More information on the conceptual East-West transit corridor (p.9) would be greatly appreciated. How will this work with the 407 Transitway? Staff note that some of the 407 Transitway alignment has been approved through the EA process.
- c. A key initiative for the City of Mississauga is bringing two-way, all-day service to the Milton GO Transit Rail line. This segment has the potential to provide important all-day transit through Milton, Mississauga, and Toronto, and should be identified as a “Core segment” (listed on p.17, under sample action “A”).
- d. City staff have compared the identified conceptual transit infrastructure depicted on Map 1 (p.10 of the Discussion Paper) to the Complete 2041 Frequent Rapid Transit Network in Metrolinx’s Regional Transportation Plan (RTP 2041, Map #6), and identified the following differences regarding the proposed network additions serving Mississauga. City staff continue to work to protect and plan for all identified transit network improvements shown in the Frequent Rapid Transit Network, and request clarification regarding these differences (please note that the RTP 2041 reference letter, as shown on RTP 2041 Map #6, is used in the list below):
 - i. RTP 2041 “f - Harvester/Speers/Cornwall” priority bus (operating on Lakeshore Road West and Royal Windsor Drive in Mississauga) is not included on Map 1 (page 10).
 - ii. RTP 2041 “i - Derry Road” priority bus is shown on Map 1 as operating between Highway 407 and Hurontario Street. In the RTP 2041, it is proposed to continue to Highway 27.
 - iii. RTP 2041 “k – Britannia Road / Matheson Boulevard” priority bus is not included on Map 1 (page 10).
 - iv. RTP 2041 “l – Eglinton Avenue” priority bus is not included on Map 1 (page 10).
 - v. RTP 2041 “m – Erin Mills Parkway / Mississauga Road” priority bus is shown on Map 1 as operating between Highway 403 and Highway 401 / Meadowvale GO Station. In the RTP 2041, it is proposed to continue north to Mount Pleasant GO Station, and south to Clarkson GO Station.
 - vi. RTP 2041 “r – Dixie Road and Bramalea Road” priority bus is not included on Map 1 (page 10).
- e. The Discussion Paper uses new terminology. For example, "Conceptual Transit Hub" is a term introduced in the Discussion Paper (Map 1, p.10). How does this relate to Metrolinx's Regional Transportation Plan, 2041 "Mobility Hubs" or "Major Transit Station Areas"? There could be greater clarity and alignment between terminology in this plan, the Growth Plan and the Regional Transportation Plan.

Implementation

- 3) How will this plan relate to Metrolinx’s Regional Transportation Plan, 2041? How will this plan relate to other provincial plans, such as the Growth Plan for the Greater Golden Horseshoe and Made-in-Ontario Environment Plan? The connection among regional

plans need to be made clear so municipalities can work on the implementation of these initiatives.

- 4) The discussion paper proposes "improving local and regional cycling linkages" (p.21). Developing a Regional Cycling Network is a part of Metrolinx's Regional Transportation Plan, 2041, and a funding partnership is a strategic direction in the Province's *CycleON: Ontario Cycle Strategy*. Will dedicated provincial funding support for regionally significant cycling infrastructure be formalized through the GGH Transportation Plan? It would be beneficial if the Plan included, as an action, dedicated and consistent provincial funding for cycling facilities that advanced the Regional Cycling Network.
- 5) Sample Actions Planned & Underway – Working with Metrolinx and local transit agencies to improve service integration and streamline fare structures in the region (page 17): What support will the province provide to further these goals? Municipalities support more integration but funding will be needed to remove local barriers for interregional trips.
- 6) Some of the supporting initiatives in the plan such as "ensuring 24-hour public transportation access" (p.9) or "supporting innovation and leveraging new technology" (p.11) will require funding. Will there be any financial support?
- 7) How often will MTO update the GGH Transportation Plan?
- 8) Will the province develop a dedicated funding strategies for higher order transit to implement the recommendations from this plan? Municipalities have limited revenue streams. As our infrastructure and maintenance needs continue to grow, new revenue streams and dedicated provincial funding is required to pursue the recommendations of this plan.

Strategic Goods Movement Network

- 9) There are some road segments identified in the GGH Strategic Goods Movement Network (p.13-14) that are not identified in Peel Region's Strategic Goods Movement Network. These discrepancies should be discussed jointly with Peel Region and City of Mississauga. These road segments are:
 - a. Creditview Road between Eglinton Avenue West and Britannia Road West.
 - b. Mavis Road between Courtneypark Drive West to Steeles Avenue (in Brampton).
 - c. Shawson Drive to Enterprise Road, and Enterprise Road to Atlantic Drive.
 - d. Aimco Boulevard from Maingate Drive to Dixie Road, and Maingate Drive from Eglinton to north of Aimco Boulevard.
 - e. Spectrum Way south of Matheson Boulevard by approximately 160m.
 - f. Viscount Road from Highway 409 to Orlando Drive, Orlando Drive to Northwest Drive, and Northwest Drive from Orlando Drive to Airport Road.
 - g. Cardiff Boulevard between Derry Road East and Tomken Road.
 - h. Britannia Road West between Erin Mills Parkway and Highway 407.
 - i. Skyway Drive between Maritz Drive and Hurontario Street.
 - j. Hurontario Street between Derry Road and Matheson Boulevard.
 - k. Whittle Road north of Britannia Road East.

Sincerely,

Thiago Oliveira

Thiago Oliveira
Transportation Planner, Transportation Planning
905-615-3200 ext. 4756
Thiago.Oliveira@mississauga.ca

c: A. Legrain; H. Zbogar; K. Chawla; S. Tanabe; S. Saiyed;