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**City Planning**

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Tija Dirks, Director  
System Planning Branch  
Ministry of Transportation  
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Dear Ms. Dirks:

On behalf of the City of Toronto, I wish to express our appreciation for the opportunity to comment on the Greater Golden Horseshoe Transportation Plan Discussion Paper. The following comments evaluate the Discussion Paper's proposals against existing City policies and Council directives as well as Provincial policies and plans. They have been organized according to the sections of the Discussion Paper.

### **A Vision for Mobility in 2051**

A high-quality transportation system is critical to sustaining the Region's high quality of life. Our prosperity depends on efficient movement of goods and excellent access to opportunities to live, work, learn and play across the region. The Discussion Paper rightfully discusses the link between an efficient and connected transportation network and the economy. However, the approach to transportation planning described in the Discussion Paper is reactive to growth. Toronto's Official Plan recognizes that integrated transportation and land use planning is critical to achieving shared Provincial and municipal goals, such as those related to the efficient use of land and resources. More could be done throughout the document to recognize the importance of aligned transportation and land use planning.

Although the Vision recognizes that the transportation system must benefit everyone, the "Transportation Challenge" is silent on the link between transportation and socioeconomic impacts to people and communities. The Greater Golden Horseshoe Plan should identify providing equitable opportunities for access to transportation and mobility, and protection from negative impacts of transportation, such as vehicle emissions and displacement

resulting from the construction of new infrastructure, as challenges to be addressed over the long term.

The environmental impacts of the current transportation system present a threat to our quality of life. Transportation is the second largest source of greenhouse gas (GHG) emissions in Toronto, after buildings, accounting for 36 per cent of total emissions. Passenger cars, trucks, vans, and buses accounted for approximately 97 per cent of all transportation emissions. Gasoline, the primary fuel used to power vehicles, accounts for about 30 per cent of Toronto's total GHG emissions<sup>1</sup>. The City of Toronto's climate action strategy calls for all vehicles in Toronto to use low-carbon energy by 2050 and for 75 per cent of trips under 5 km to be walked or cycled.<sup>2</sup>

In 2019, Toronto City Council declared a climate emergency and committed to a target of net zero greenhouse gas emissions by 2050. The target is in line with keeping global average temperature rise below 1.5 degrees Celsius.

In light of the climate emergency, the urgent need to transition to low carbon transportation must have a prominent role in the Greater Golden Horseshoe Transportation Plan. Greater emphasis should be placed on the need for infrastructure, services and policies to support the transition to zero emission personal and commercial vehicles and active transportation (including pedal-assisted bicycles). The importance of the transition should be emphasized by incorporating "low carbon" into the vision as follows:

"Our proposed vision is of an interconnected low carbon transportation system that provides a safe, seamless and accessible transportation experience for all."

Climate change and the need to switch to low carbon transportation are also missing from the list of new challenges that will have to be considered in planning the transportation system over the next 30 years.

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<sup>1</sup> Toronto's 2018 Greenhouse Gas Emissions Inventory

<sup>2</sup> 2017.PE19.4 -TransformTO: Climate Action for a Healthy, Equitable and Prosperous Toronto - Report 2 - The Pathway to a Low Carbon Future (<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.PE19.4>)

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## Pillar 1: Getting People Moving on a Connected Transit System

### *Scope of Initiatives*

The Discussion Paper highlights major transit investments and near term actions included in the Province's mobility vision for 2051. In particular, it highlights the Province's extensive investments in higher-order transit to enhance mobility across the City and region, including the recent \$28.5 billion investment in the Subway Program. The City looks forward to continuing to collaborate with the Province to plan, design, procure, and implement transit expansion initiatives that will enhance connectedness and mobility across the City of Toronto and the region.

The City would like to note other major transit initiatives underway in Toronto that will contribute to regional mobility. In particular, the City's SmartTrack Stations program combined with Metrolinx's GO Expansion Program, will transform heavy rail infrastructure in Toronto from a regional commuter service into an urban rapid transit network. The City will be commencing a Transit Project Assessment Process later this summer on Eglinton East LRT (EELRT) while also undertaking work to update the corresponding business case, as well as the business case for the Waterfront East LRT. An update on recommended next steps to City Council on both priorities is anticipated for late 2021. The EELRT would provide transit to historically underserved communities in the City, travel through or adjacent to seven Neighbourhood Improvement Areas, and bring higher-order transit within walking distance of an additional 49,000 people. The Waterfront East LRT would bring higher-order transit to Toronto's waterfront that is undergoing a significant transformation with rapid growth either underway or planned for many precincts along the water's edge.

In addition, City Council has requested that the Province and Metrolinx advance priority of the Sheppard Subway Extension in light of approved transit-related densities along the project corridor.<sup>3</sup>

The Province's mobility vision for 2051 is ambitious. While major transit initiatives noted in the plan are at various stages of planning, design, and procurement, there are many that will be entering into project delivery and construction stages in the near future and in close timelines. As such, in the near term, the City notes that there needs to be a corresponding skilled labour market plan to respond to the anticipated increase in industry needs.

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<sup>3</sup> 2020.EX16.5 - Provincial Priority Transit Expansion Projects - Subway Program Status Update Third Quarter 2020  
(<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EX16.5>)

The major transit expansion initiatives underway will have significant impacts on municipal services, properties, facilities, and local communities. As part of implementation of the Province's proposed vision, it will be critical for the Province to work closely with municipal governments, local transportation agencies, industry, local businesses, Indigenous partners and other service providers to shape the transportation system.

Additionally, as with all large-scale, long-term construction projects, the City requests that impacts to local businesses and communities be minimized and that supports be provided to impacted parties through actions such as local procurement and employment opportunities including for equity-deserving groups, youth and apprentices, amongst others.

The substantial long-term impacts throughout the construction period of these major transit expansion initiatives will continue to require close coordination between the City and Province. The Ontario-Toronto Transit Coordination Governance Framework can continue to serve as a forum for intergovernmental engagement and coordination and to seek alignment on strategies to minimize municipal impacts and support our local communities.

### *Fare Integration*

Fare integration will be critical to integrate transit services and create seamless connections. Per City Council Direction, as part of the Ontario Line, the City continues to work in consultation with the TTC and Metrolinx to ensure that:

1. there is full and affordable fare integration between all lines, systems and technologies, as per previous plans to implement fare integration approved by City Council, including a single fare for rides within the City of Toronto;
2. fares not be established based on distance; and
3. fares for any new lines be established by the Toronto Transit Commission Board<sup>4</sup>.

## **Pillar 2: Enhancing Capacity and Performance on Congested Roads**

The vision puts too much focus on relieving congestion by building new infrastructure such as roads and highways. The Provincial Policy Statement calls for land use patterns that promote active transportation and transit before other modes of travel. The City recognizes

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<sup>4</sup> 2019EX9.1 - Toronto-Ontario Transit Update  
(<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EX9.1>)

that encouraging people to use modes other than their private vehicles – such as walking, cycling or public transit – is an important traffic management strategy<sup>5</sup>. The City pursues Travel Demand Management (TDM) measures through policies and strategies to reduce travel demand and make the best use of the existing transportation network capacity.

Per the Official Plan, TDM measures are aimed at encouraging people to take fewer and shorter vehicle trips to reduce congestion, energy consumption and pollution. In the past, transportation planning has often focused on supply-side solutions by identifying where additional transportation capacity is needed to satisfy travel demand forecasts. TDM, in contrast, puts the emphasis on changing travel behaviour to modify and reduce our demand for vehicular travel in cities. TDM is most effective when supported by complementary actions in the key areas of land use planning and public transit improvements

Per Council-endorsed Official Plan policy, the City supports implementing TDM measures to reduce auto dependence and rush-hour congestion including working with the Province to pursue a region-wide study of road pricing to better manage traffic.

### **Pillar 3: Efficiently Moving Goods across the Region**

The Province should consider additional measures to improve the efficiency and safety of goods movement. The City supports Off-Peak Delivery (OPD) and partnering with the Province to promote OPD across regional boundaries.

There should be more of an emphasis on multi-modal freight. For example, the City supports regulatory changes to promote motor assisted cargo bicycle operation.

The Vision should consider the impact of the Strategic Goods Movement Network on surrounding lands, including impacts on equity-deserving groups<sup>6</sup>.

### **Goal 1: Improve Transit Connectivity**

Building new higher-order transit may be more appropriate as a long-term action item. Instead, this section can focus on improving surface transit service through short-term and low-cost measures such as exclusive bus lanes and transit signal priority. Council has

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<sup>5</sup> 2020.IE17.6 - MoveTO 2021-25 - Congestion Management Interim Action Plan and Non-Competitive Contract for Smart Signals (<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.IE17.6>)

<sup>6</sup> 2020.IE16.1 – Freight and Goods Movement Strategy (<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.IE16.1>)

endorsed the enhancement of surface transit priority corridors through reserved lanes, intersection and signal improvements and customer comfort improvements at transit stops.<sup>6</sup>

Metrolinx's 2041 Regional Transportation Plan (RTP) establishes a Frequent Rapid Transit Network (FRTN) that identifies corridors within Toronto and across the GTA for enhanced surface transit priority. The FRTN recognizes the importance of priority bus corridors that will bring fast and frequent transit services to parts of the region that have not yet developed the density or ridership needed to support LRT, BRT or subway services

## **Goal 2: Relieve Congestion**

More emphasis is needed on Transit-Oriented Communities (TOC) and their potential to discourage automobile dependence, and reduce congestion and greenhouse gas emissions. The Official Plan recognizes mixed use development as the best way to move less; it also recognizes the importance of promoting office growth on rapid transit lines throughout the City and Region, and of sustaining existing space in transit-rich areas.

The Province proposes leveraging partnerships for TOCs to make it easier to find housing or jobs near transit. Creating complete communities will be critical in order for TOCs to reduce congestion. Consistent with the Growth Plan, the Province should provide direction to municipalities to achieve the appropriate balance of land uses. Land use development may not be as short-term a goal as is implied in the Discussion Paper, and may also be included under the long-term Vision.

Consistent with the City's MOU with the Province on TOC, we continue to request that the Province of Ontario commit to an early discussion with the City about potential transit-oriented community developments in order to shape commercial arrangements in ways that support the City's planning vision for the area and allow City staff to keep local councillors informed about such discussions.

The Province should give early consideration of the community needs and requirements for development at each TOC site. This will be particularly important for employment areas where the Province proposes to introduce residential uses through the TOC proposal and where additional infrastructure is required to enable development.

City Council has communicated to the Province that the City's support for any Minister's Zoning Order or City-initiated planning approval regarding the development of TOC proposals will be premised on the following:

- a. robust and timely consultations with the local community and Councillor;

- b. provision of the maximum possible number, affordability and tenure of affordable housing units on each development;
- c. partnership with the City, to determine an approach to the Transit-Oriented Communities Program development that is consistent with the City's planning framework and policy intent for each site and, where consensus is not reached with the City, provides a rationale for the Province's actions;
- d. high quality design standards for buildings and streetscapes, and appropriate consideration for heritage, consistent with the City's urban design guidance and respecting the existing and planned context; and
- e. provision of a complete core submission package for each site early enough to allow City staff, communities and Councillors to consider and provide comment.<sup>7</sup>

### **Goal 3: Give Users More Choice**

There needs to be a clearer distinction between Goal 3 and Goal 1, as some of the action items in this section seem to focus on providing transit. Giving users more choices can include more choices to accessing transit. Shuttle buses, bike share discounts and subsidized ride share to higher-order transit stations are all ways of accomplishing this.

The City recognizes that enabling cycling access to regional and light rail stations provides a convenient and flexible door-to-door connection that can be a substitute for car journeys of comparable distances.<sup>8</sup>

The City supports creating a safe, connected and comprehensive active transportation network. The City's Official Plan has the objective of bringing all Toronto residents within one kilometre (km) of a designated cycling route. The City's long-term goal is that 75% of trips under 5 km are walked or cycled by 2050<sup>9</sup>.

The Discussion Paper does not touch on the need to improve the pedestrian and cycling environment at highway interchanges. The City identifies barriers such as highways as a significant factor in cycling network planning, and supports the creation of crossings where there currently is not sufficient connectivity.<sup>8</sup> The Toronto Walking Strategy also recognizes highways as barriers to pedestrian travel. Highway interchanges (ramp terminal intersections

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<sup>7</sup> 2021.EX23.3 - Provincial Transit-Oriented Communities Program  
(<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.EX23.3>)

<sup>8</sup> 2019.IE6.11 – Cycling Network Plan Update (  
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.IE6.11>)

<sup>9</sup> 2017.PE19.4 -TransformTO: Climate Action for a Healthy, Equitable and Prosperous Toronto - Report 2 - The Pathway to a Low Carbon Future (<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.PE19.4>)

and the highway underpass/overpass) should be improved to make them more pedestrian and cycling friendly.

The Province can provide direction on the regional active transportation network so that the different regions are coordinated.

#### **Goal 4: Keep Goods Moving**

In discussion of near-term actions to improve the sustainability and efficiency of the freight sector, there is no mention of the need to transition to freight vehicles that are powered by electricity or renewable fuels. This section could include actions around providing policy and infrastructure to support this transition. The impacts of any proposed changes to the freight and goods movement system should be assessed from an environmental perspective<sup>10</sup>.

The Discussion Paper focuses on inter-urban freight. More consideration should be given to measures to improve the safety of goods movement and the efficiency of urban freight operations (e.g. drop yards, consolidation centres, etc.).<sup>11</sup>

#### **Goal 5: Safe and Inclusive**

While the Plan's vision calls for a transportation system that provides a safe transportation experience, few of the actions directly address this. A commitment to Vision Zero, accompanied by concrete actions to improve the safety of the transportation system for all users, would be welcome. Toronto's commitment to Vision Zero includes actions such as: a speed management strategy; road design improvements; proactive improvements at high-risk crossings and intersections; and an education and engagement plan. The Province's support has been essential for the City to implement elements of Vision Zero, such as automated speed enforcement.

Instead of "Equality of Opportunity", the Province should apply an equity lens to this goal to recognize the diversity of people's and communities' circumstances. This should be formulated into short action plans for each of the goals. Transit and infrastructure investment needs to be better directed to serve those who need it. The importance of improving accessibility specifically for disabled patrons through service enhancements, stop/station design, and reduction/removal of barriers within and between local transit systems region-wide should also be emphasized.

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<sup>10</sup> 2020.IE16.1 – Freight and Goods Movement Strategy (  
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.IE16.1>)



## Goal 6: Future Ready

As mentioned previously, the environmental impacts of transportation and the need to be resilient to function during extreme weather should be emphasized in the overarching Vision, not just in the short-term goals. Clarity is needed on how actions such as expansion of the provincial highway system relate to the goal of minimizing the impact of the transportation system and users on the natural environment.

The Plan should consider how emerging technologies can be best adopted to align with the other goals of the plan. The City's Automated Vehicles Tactical Plan provides guidance on the adoption of autonomous vehicles (AVs), so as to maximize their social and environmental benefits while addressing concerns such as data privacy. For example, steps should be taken to discourage low-occupancy AVs and promote electrification. AVs should be adopted in a way that supports space-efficient modes such as transit and active transportation.

## Conclusion

I appreciate your consideration of our comments. If you have questions, please contact Michael Hain, Program Manager, Transportation Planning, City Planning Division at [Michael.Hain@toronto.ca](mailto:Michael.Hain@toronto.ca) or 416-392-8698. We welcome further opportunities to provide input to the Plan and look forward to collaborating to shape a better transportation network for the region's future.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Lintern".

Gregg Lintern, MCIP, RPP  
Chief Planner & Executive Director  
City Planning Division

CC: Barbara Gray, General Manager, Transportation Services  
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