

August 2021

Sent via email and EBR

Ms. Arielle Mayer
Senior Policy Advisor
Ministry of Transportation
Policy and Planning Division
Transportation Planning Branch Environmental Policy Office (Toronto)
777 Bay Street Suite 3000
Toronto, ON M7A 2J8

Dear Ms. Mayer

RE: Discussion Paper: Towards a Greater Golden Horseshoe Transportation Plan

The City of Guelph and the Guelph Chamber of Commerce applaud the Province on its discussion paper, "Towards a Greater Golden Horseshoe Transportation Plan". The Plan clearly diverges from past historical trends favouring travel by car, and instead prioritizes investing in and delivering improved regional public transit, leveraging new mobility technologies, and improving regional goods movement. As member organizations of the Connect the Corridor coalition, we are again grateful to the Province for demonstrating ongoing commitment to two-way all-day GO service(TWADGO) along the Kitchener rail line, as well as continued improvements to Highways 6 and 7 in our region. These directions are well aligned with the City of Guelph's "Future-Ready: Strategic Plan", where our transportation targets include improving connectivity by all modes, supporting improvements to sustainable interregional travel and goods movement, and ensuring safety for all road users.

Our comments below reflect the shared views and interests of the City of Guelph and the Guelph Chamber of Commerce. We have organized feedback into three parts: (1) Feedback on the Vision statements, and (2) feedback on the priority actions for each goal, and (3) considerations for implementation. We also view this submission as an opportunity to reiterate our encouragement of provincial leaderships as it relates to addressing service gaps emerging from the recent closure of Greyhound. Together, the City and the Guelph Chamber of Commerce have called for the creation of an express route between Toronto and Guelph in time for the Fall university semester to better enable students, faculty and other commuters to arrive to our community. Such a measure would serve as an important stop gap until the vision as set out in the discussion paper can be implemented. We appreciate the Province's acknowledgement of our concerns, expressed in the letter on August 12, 2021 and look forward to further discussion.

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1. A vision for mobility in 2051

a. Getting people moving on a connected transit system:

This vision supports our efforts to attract and retain talent in our workforce. We are supportive of integrated fares and services across the region, provided there is sufficient oversight and coordination at the regional level, especially around procurement processes, equalization of cost impacts and revenue opportunities based on population or ridership, and governance structure.

While we support the provision of 10-minute frequent local transit service across all urban areas, provincial and federal funding will be needed to support transit operational and capital costs associated with elevating service levels. Clarity is also required about assumptions of service coverage and which local routes would be prioritized.

b. Enhancing capacity and performance on congested roads:

We are encouraged to see the new Hwy 7 and Morriston Bypass projects on "Map 2: current, planned and conceptual future road infrastructure". These connections are essential to supporting the necessary goods movement and passenger/commuter travel needs west of the GTA, while permitting us to utilize local road capacity for enhancing sustainable transportation options including bus-only lanes and active transportation facilities.

The Hanlon Expressway upgrades are required to achieve Guelph's mode share targets to reduce personal auto travel and increase transit, cycling and walking mode shares by diverting cross-town traffic to the highway. These improvements support safer and more efficient goods movement through our region.

Guelph is supportive of a complete street design approach to all provincial transportation infrastructure. We strongly encourage the Province to set robust design guidelines for highway overpasses and underpasses, and on/off ramps in particular, as these often pose significant barriers to safe travel by active modes.

Guelph cautions that the approach to adding capacity to Highway 401 may result in attracting more personal vehicle trips (induced demand) without parallel travel demand and mode shift efforts (such as dynamic highway messaging, tolls, and transit pricing strategies).

Managing passenger travel demand during peak hours with pricing, parking charges and other strategies is supported by Guelph. TWADGO should be established and priced competitively to highway travel in order to successfully attract more trips to GTA and to Waterloo Region by train/bus. Telework can also reduce total number of trips where feasible.

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We strongly encourage the Province to carefully consider the affordability and equity impacts of highway and parking pricing and recommend policies and programs to provide subsidies or adapted pricing strategies to mitigate these impacts.

c. Efficiently moving goods across the region

We acknowledge and support the important role of the Hanlon expressway for goods movement through and across our community, as shown on Map 3 of the discussion paper. As such, we strongly encourage advancing the improvements to a freeway with the necessary grade separations and interchange work required to improve traffic flow and capacity on the Hanlon. This is required to accommodate trip projections to 2051 locally and regionally without creating significant congestion concerns on the local arterial road network.

Interregional goods movement will be further supported by the ongoing commitment to construct the new Highway 7 connection between Kitchener and Guelph. We are encouraged by the progress being made currently on the Highway 7 design and construction projects at either end. We hope to see this project fully completed and operationalized in a reasonable timeframe to relieve congestion and delays experienced on the existing Highway 7/Woodlawn Road/Victoria Street route.

Directed by our Guelph: Future-Ready strategic plan, the City of Guelph is planning to establish an Emerging Transportation Technology office in 2022 that would support partnerships, pilots, and projects that analyse and implement new transportation technologies in our community. We are pleased to see connected corridors as one of the directions the Province is exploring, and would potentially be interested in partnering with the Ministry on such initiatives in the future.

2. Feedback on the goals as they relate to priority actions needed a. Goal 1: Improve transit connectivity

Guelph Transit currently has expansion plans in our capital budget forecast to connect service with the Region of Waterloo, provided that matching service can be offered by the Region. Provincial coordination and support of these initiatives, along with financial support for operational costs would ensure future success for local inter-regional transit service improvements such as this. While local leadership has proven to be a necessary stop gap, we encourage the Province to play a greater role funding and leading interregional transit initiatives in our area.

With respect to active transportation, we strongly encourage physically protected cycling lanes to connect people to transit stations. This enhanced level of service (protected, and maintained year round) ensures the "interested but concerned" demographic of potential cyclists can be attracted to shift modes. The City of Guelph is already committed to providing protected first/last mile connections for

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13 kilometers of our core cycling network, and recognize the invaluable contributions of the Infrastructure Canada Investment Program (ICIP) toward achieving these improvements.

Supporting active transportation to stations requires robust end-of-trip facilities, especially at major transit stations that serve commuters who may be gone most of the day. Secure, theft-proof bicycle storage is essential to supporting increased trips by bike, and should be a required component of any major transit station project.

b. Goal 2: Relieve congestion

As noted above, we caution that widening capacity on the 400 series highways without parallel investments in affordable and frequent interregional transit could simply result in additional congestion in the long term. To strike a balance of meeting the needs of captive drivers and goods movement, we strongly encourage the Province to explore pricing options for personal movement in concert with improvements to regional transit and highway expansions. Consideration for equity and affordability impacts will be critical when introducing pricing mechanisms.

We would like to see priority given to the completion of Highway 6 (Hanlon Expressway) improvements to a fully grade-separated freeway and the new Highway 7 connection between Kitchener and Guelph in order to support efficient goods movement between these communities and Hwy 401. This also supports access to Guelph's Provincially Significant Employment Zone at Laird Road and the Hanlon/Hwy 6 North.

c. Goal 3: Give users more choice

The City of Guelph and the Guelph Chamber of Commerce emphasize the need for enhanced express bus service between major urban regions, particularly those previously served by Greyhound, as a key priority. These connections have been lost to commuters, including (but not limited to) university students attending the University of Guelph campus. We have members of the community that heavily rely on transit to commute to and from Guelph from Hamilton, Mississauga, and Waterloo Region – regions that have been underserved by transit.

While we support opening up the intercommunity bus sector, we are concerned that this may still leave important service gaps in the network if there is not a sufficient "business case" for private industry to step in. As noted in our July 6th correspondence with the Ministry, our community is particularly impacted by the loss of Greyhound service between Guelph and adjacent regions (Waterloo and GTA in particular) and wants certainty that two-way frequent bus service is provided. Again, we look forward to discussing opportunities to maintain necessary bus services with you in the near future.

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There is some initial interest in Guelph by private transportation companies to service these routes. We are pleased to know the Ministry will be monitoring this sector and encourage the Province to intervene if gaps continue.

Furthermore, the City of Guelph is counting on Provincial support in its efforts to extend local transit connections with Region of Waterloo. In addition to advocacy support with neighbouring municipalities to meet our services, we expect there would be financial support from the Province to maintain operations.

We are pleased to see commitment to the provincial cycling network and seek clarity on what role the Province intends to play in the construction of connecting links within and to the network. To advance this objective, we encourage the province to consider new funding or provincial-led construction.

d. Goal 4: Keep goods moving

Goal 4 should include prioritization of provincial highway projects that improve travel time for goods movement, such as grade separation projects, and completing in-progress projects such as the new Highway 7 between Kitchener and Guelph, and the Hanlon expressway grade separations.

The City of Guelph would like to see priority actions to study and explore autonomous freight opportunities over the next 30 years, given the potential efficiencies and improvements to highway capacity that this could represent. We encourage the province to consider this option as it advances interregional transportation planning.

In addition to autonomous vehicles, other technologies and services that streamline goods movement should be studied and promoted throughout the region. For example, the Guelph Junction Railway, a municipally-owned shortline rail corporation, has recently integrated software called Shipper Connect which improves freight car tracking and scheduling digitally, and serves to attract and accommodate increased freight volumes locally. Guelph is well-positioned to continue to play an important role in logistics for the GTA west region. This not only supports economic development in the region, but plays an important role in reducing greenhouse gas emissions from the logistics sector: each train car effectively eliminates 3-4 tractor trailers from the road network.

e. Goal 5: Safe and inclusive

Accessibility and affordability are priorities of ours and many other communities. As such, we encourage the Province to provide leadership and guidance to municipalities on how to accommodate electric scooter and e-bike transportation (Micromobility) in a safe and universally accessible manner. These can provide alternatives to people traditionally left underserved by transportation options;

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however, others are at heightened risk. Guidelines for safe promotion and infrastructure design of these vehicles should be a priority given their rapid emergence on the market. As well, it is important that affordable options for interregional transportation are made available to our residents so that taking public transit is accessible regardless of income.

We also recommend that the Province support a Vision Zero approach to transportation infrastructure design to aim to reduce the number of serious injuries and deaths on Ontario roads. The City of Guelph has recently approved the Community Road Safety Strategy, which adopts the principles of Vision Zero to meet these goals within our own community.

f. Goal 6: Future-ready

The future ready goals are aligned with the City of Guelph's own "Future Ready" strategic plan but can go farther. To meet these goals to reduce emissions from the transport sector to net zero by 2050, the City needs to see financial incentives for residents who choose low-carbon or carbon free vehicles, and a building code that requires developers to include 100% EV-ready parking spaces.

As noted above, we also see an opportunity to foster and promote Micromobility options more aggressively throughout the region, and particularly for first/last mile travel. Equity and accessibility should be important considerations.

We reiterate the need to prioritize research, development and regulatory guidelines to embrace autonomous vehicles, including drone technology, into our mix of transportation options.

3. Implementation considerations

Data for the transportation sector is evolving, with increasing access to cellular-based data. The City and its partners would like to understand the Province's plans to update and modernize its data collection practices for the purposes of regional modeling. The current Transportation Tomorrow Survey (TTS) continues to serve us well, but may be less reliable for multi-modal transportation trends than emerging data collection opportunities. The TTS is limited in its ability to predict or project economic impacts, whereas emerging data sources may provide more information that helps municipalities and regions plan ahead more effectively and accurately.

The discussion paper does not mention funding sources for implementation. As electric vehicle ownership increases, there are growing concerns about how various levels of government will continue to fund important transportation infrastructure and services given potential impacts on the provincial gas tax and the federal Canada Community Building Fund. Details around funding opportunities should factor prominently in the implementation section. The Investing in Canada Infrastructure

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Program is another important resource for municipalities that should be continuously topped up into the future.

Lastly, we wish to recognize and appreciate the improved coordination and communication between the City and both MTO and Metrolinx in recent years. Our quarterly and bi-annual meetings with these agencies are instrumental to improved coordinated communication to the local community and success in delivering on projects in our city. We strongly encourage this model to be expanded so other communities may also benefit from this relationship-building strategy.

For any questions about this submission, please connect with Jennifer Juste, Manager, Transportation Planning for the City of Guelph at Jennifer.juste@guelph.ca. We welcome this opportunity to provide feedback to the province and would welcome further engagement towards improving interregional transportation for the people of Guelph.

Sincerely,

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