

December 28, 2016

Laurie LeBlanc
Deputy Minister
Office of the Deputy Minister
Ministry of Municipal Affairs
College Park
17th Floor, 777 Bay Street
Toronto, ON M5G 2E5

Dear Deputy Minister:

Subject: Metrolinx Submission on the Provincial Coordinated Review: Proposed Growth Plan for the Greater Golden Horseshoe

Thank you for the opportunity to provide input to the legislated review of the Growth Plan for the Greater Golden Horseshoe (GGH), as set out in the *Places to Grow Act*. As the regional transportation agency for the Greater Toronto and Hamilton Area (GTHA), Metrolinx has a mandate under the *Metrolinx Act, 2006* to provide leadership in the coordination, planning, financing and development of an integrated, multi-modal transportation network. This mandate includes developing and reviewing the transportation plan for the GTHA and planning, co-ordinating and setting priorities for its implementation.

Together we have made a lot of progress as the region has continued to grow and thrive over the past ten years. Along with municipalities, transit agencies, provincial ministries and stakeholders, we have begun the transformation of the transportation system in this region. Through the provincial *Moving Ontario Forward* program, the Ontario government has demonstrated its commitment to transform mobility in the region through Metrolinx. Managing growth in a sustainable fashion, is our common objective, even as the challenges and the solutions may change over time.

As we review and update the Regional Transportation Plan (RTP) for the GTHA at Metrolinx, we continue to coordinate our efforts with the Ontario Growth Secretariat in the areas of research, timelines and municipal engagement. We are pleased to see Metrolinx's contributions continue to inform the policies in the proposed 2041 Growth Plan. The development of the draft RTP, anticipated in summer 2017, will build on our research and the proposed policies.

Metrolinx sees value in the general directions of the proposed Growth Plan to 2041. Alignment of the existing and funded rapid transit services with current and planned land use is critical and should be further improved. Our comments in our June 2015 submission on the Co-ordinated Review Discussion Paper reflect this point. It is important that the Growth Plan be more precise in its intent and be backed by sound analytics, to ensure that implementation results in the desired outcomes. We offer the following general and specific comments (see Appendix) to assist in refining the proposed 2041 Growth Plan.

The following comments bring to bear our last ten years of experience in developing and delivering on The Big Move plan.

1. Prioritizing intensification to areas with committed transit investments

As we noted in our June 2015 submission to the Crombie Panel, we know now where major transportation infrastructure will be located with certainty to 2025, and because of that, we need to make sure these investments will be used to their full potential. Also today, we have much more certainty about where growth is being directed for the next 25 years. The RTP Discussion Paper (2015) provides some preliminary analysis in this regard. Since 2008, there has been a significant commitment to transit infrastructure that was not known at the time that the 2006 Growth Plan was approved. In addition, infrastructure and service planning for GO Regional Express Rail is well-underway. This significant (\$13.5B) transformative investment of the GO commuter service to a 15-minute all-day regional network will drive increased transit mode share and transit-oriented development around GO RER stations, which in turn will attract greater ridership (see Appendix 2).

With this new rapid transit infrastructure in place over the next 10 years, it is our recommendation that the policies in the updated Growth Plan should place higher priority to growth and intensification at i) station areas, ii) mobility hubs, iii) at GO stations where there is existing and committed frequent two-way all-day rapid transit service, and/or iv) at stations or terminals where other committed rapid transit funding is in place. Prioritizing these areas involves greater recognition of the impact these investments will have on where jobs and people will be located. Giving greater priority to those areas where transit investments are being made will ensure alignment of transportation and land-use decisions, and ultimately contribute to the overall effectiveness of provincial transit investments.

As jobs are the primary generator of trips in the region, employment-related policies in the Growth Plan should be strengthened to ensure office employment is located where they can best be supported by all modes, not just single occupancy vehicle trips.

Employment-related growth policies need to ensure that new major office developments will be in appropriate locations that are transit supported. Directing jobs to transit corridors, stations and hubs to support anticipated growth is also essential to meeting the potential of the Growth Plan. Our land use forecast work with Hemson Consulting finds that the growth in employment in downtown Toronto is advancing more quickly than forecasted, and will be more concentrated in that downtown core than is reflected in the current Growth Plan.

2. Aligning land use planning and transportation infrastructure

Metrolinx supports the proposed Growth Plan's intention to optimize the coordination of transportation planning and land use planning with built infrastructure. We see this reflected in the policies that encourage connectivity, offer transportation choices, support sustainability, encourage multimodal access and provide for the safety of system users. We have proposed additional language that clearly emphasizes integration, and draws on the proposed goals for the next RTP which adopts holistic multimodal planning for the GTHA, with the following themes: connectivity, convenience and integration; equity and accessibility; health, comfort and safety; a well-planned region; exemplary environmental footprint, and prosperity and competitiveness.

The need to better integrate land uses with all forms of transportation including rapid transit infrastructure is well-illustrated in the case of office parks, areas that are typically hard to access and service by traditional public transit. Metrolinx is supportive of policies that aim to improve transit access

in order to reduce auto trips in the region. The policies should recognize that suburban office parks offer a unique context and should be supported by transit services that are appropriately suited to their suburban contexts. At the same time, land use planning must support making transit and walking accessible and desirable choices in office park locations.

3. Coordinating the RTP review with the work of provincial ministries

The Growth Plan and the RTP can be mutually supportive, and our processes should reflect the iterative nature of their development through their respective review processes. Coordination is important so that we can provide a harmonized, provincial direction on managing long-term growth with our municipal partners and other stakeholders.

Several of our stakeholders have conveyed to us their concern that there is a need to better integrate our respective plans and guidelines (e.g. the Growth Plan, the RTP, the Provincial Policy Statement, Transit-Supportive Guidelines, Mobility Hubs Guidelines, the GO Station Rail Parking and Station Access Plan, #CycleON, the Climate Change Action Plan and other related initiatives) to realize a more successful urban region. Greater harmonization between provincial programs and initiatives and Metrolinx could extend to more sharing of data, research, findings and common lessons learned; aligning timing of plan reviews; and evolution of public policies.

To support the RTP review we have undertaken modeling and analysis of population and employment growth trends and forecasts in the GTHA. In conjunction with the Discussion Paper for the next RTP, we released the *Context Paper on the Regional Economy, Demographic Outlook and Land Use*. This work together with subsequent analysis and modelling of population and employment distribution in the region has helped to better understand where growth is locating in the region and the impacts that transit investments could have on the distribution of that growth. Our tools can be levered to assist with understanding the impact of the proposed Growth Plan. We would be pleased to work together to build on our land use forecast work.

Over the last decade, Metrolinx has developed expertise in working with municipalities and other stakeholders on planning, delivery and operations – including capital infrastructure projects (e.g. VIVA and MiWay bus rapid transit), transit service integration (e.g. GO Transit, and integration with local services), transportation modelling, forecasting and research initiatives, “first-mile/last-mile” programs, and much more. In doing so, we have had a productive relationship with municipalities and provincial ministries and look forward to continuing to work together to strengthen the region’s long-range land use and transportation planning framework.

Sincerely,



Leslie Woo
Chief Planning Officer

c. John Lieou, Deputy Minister, Ministry of Transportation

APPENDIX: Specific Comments on Proposed Growth Plan Policies

I. INTRODUCTION

1.2 The Growth Plan for the GGH

We are pleased to see that transportation is included in the Vision for the GGH (page 4). To be consistent with the results of current technical analysis and research on the future of mobility in the region (conducted to support the RTP legislated review) and to align with the language used in the proposed Vision for the next RTP (see the RTP Discussion Paper), we offer the following changes to the text to present a consistent vision for the region’s transportation system.

Proposed Growth Plan	Recommended text
Getting around will be easy. An integrated transportation network will allow people choices for easy travel both within and between urban centres throughout the region. Public transit will be fast, convenient and affordable. Automobiles will be only one of a variety of effective and well-used choices for transportation. Transit and <i>active transportation</i> will be practical elements of our urban transportation systems.	Getting around will be easy <u>simple</u> . An integrated, <u>multimodal transportation network system will offer a variety of options for getting around reliably, comfortably, conveniently and safely. It will be easy to choose modes of travel that reduce our environmental footprint. It will connect people to jobs, move goods and deliver services efficiently throughout the region.</u> will allow people choices for easy travel both within and between urban centres throughout the region. Public transit will be fast, convenient and affordable. Automobiles will be only one of a variety of effective and well-used choices for transportation. Transit and active transportation will be practical elements of our urban transportation systems.

We are also pleased that our prior suggestion (Letter to Deputy Minister; July 11, 2015) to recognize the RTP was acknowledged and addressed in the proposed Growth Plan’s Introduction (page 5), as it contributes to a more complete and comprehensive picture of the provincial planning and policy framework, as it applies in the region. However, we propose amended phrasing (below) to refer to the RTP more accurately to make it clear that the RTP is a multimodal transportation plan (under *The Metrolinx Act, 2006*) and one that is meant to be implemented by all regional municipalities and stakeholders, including the Province.

Proposed Growth Plan	Recommended text
The implementation of the Growth Plan has been supported by the creation of Metrolinx and The Big Move (the regional transportation plan for the GTHA) to implement the Growth Plan’s transit and transportation policies. Since 2006, the Province has made significant investments in transit projects in the GTHA, and continues to invest in rapid transit projects to support the regional transit network.	The implementation of the Growth Plan has been supported by Metrolinx, the regional transportation agency (created in 2006) and the first multi-modal regional transportation plan (<i>The Big Move</i> , published in 2008), which guide the work being done by the agency, provincial ministries, municipalities, transit agencies and other partners to transform the way people and goods move in the Greater Toronto and Hamilton Area. The regional transportation plan works in tandem with provincial plans and policies to manage growth and address climate change over

We also suggest that as a Guiding Principle (proposed 1.2.1), some active language be adopted for the third point – i.e. “provide flexibility to capitalize on and shape new economic and employment opportunities ...”

Lastly, we recommend that the Introduction to the Growth Plan recognize the importance of corridor protection, as it is a theme that runs through many chapters of the proposed plan. For example, it could be added to the Principles (proposed 1.2.1): “Prioritize intensification and higher densities to make efficient use of land and infrastructure while supporting and protecting transit viability.”

Section 2. WHERE AND HOW TO GROW

2.2 Policies for Where and How to Grow

The continued emphasis in the proposed Growth Plan on “complete communities” is shared by the RTP. Of particular note is the support for transit-supportive communities, which are more likely to be able to make effective use of infrastructure investments. For areas with limited transportation options, good land use planning is crucial for encouraging GTHA residents to choose transit or active transportation for work and non-work trips, and is an important means of encouraging more sustainable “first-mile/last-mile” trips to and from transit stations.

We suggest that paragraph 7 (pg. 11) provides an opportunity to emphasize that the intent of the Growth Plan is to make priority transit corridors a main concern. In addition, in the last sentence where it states that the “... the Province expects municipalities to ...” that it be changed to “...the Province requires ...”

2.2.1 Managing Growth

- Section 2.2.1.2(e) (Managing Growth) reads “... focusing growth in areas with existing and planned transit, with a priority on higher order transit”. We recommend revising this to add, “...while ensuring a suitable level of compatibility between land uses in order to protect current and future rail facilities and associated operations.” As noted elsewhere in our comments, we recommend replacing “planned” with “committed” in order to emphasize that intensification should happen at those places where transit funding has been directed, or we know will be. Another option may be to provide a definition of “planned” if it is to remain in use throughout the Growth Plan.
- We suggest that section 2.2.1.2(g) replace use of the term “intra and inter-municipal transit” with different wording, as it is potentially confusing to the reader. In addition, this policy’s intent should be clarified with some revised text, as it currently reads as though the aim is to provide multimodal access to public transit, rather than to key trip generators or destinations. Our suggestions are:
 - (g) “providing convenient, multimodal access to local and regional transit, giving priority to connections between residents and jobs” OR
 - (g) “providing convenient, multimodal access between trip origins and destinations, giving priority to connections between residents and jobs”.
- Section 2.2.1.3 (d) presents an opportunity to highlight quality of life or healthy communities. For example, text could be added to the effect that: “Applying the policies of this Plan will support the achievement of *complete communities* that support overall quality of life, including human health,

for people of all ages and abilities through the planning for and provision of: ...vi. Prohibiting development of non-compatible land uses within a neighbourhood."

2.2.2 Built-up Areas

- Intensification in key locations is essential if the goals of the Growth Plan, the RTP, the GO RER program and rapid transit investments are to be achieved. However, we caution that municipalities have described (through RTP review discussions) confusion about the rationale for the change, and the application of the new minimum intensification target. They have also expressed doubt about being able to achieve the target. We suggest that to address some of these concerns, establishing an agreed-upon way of calculating and measuring the target would be helpful.

2.2.3 Urban Growth Centres

- In our prior submission, we emphasized the importance of directing jobs to Urban Growth Centres, and we appreciate the stronger language presented in the proposed Growth Plan. Urban Growth Centres (UGC)s that have Major Transit Station Areas (MTSAs) should be identified as priority areas with the most potential to be serviced by frequent transit and therefore should see the most intensification, including employment.
- As above, we recommend that when referring to "planning for UGCs" avoid the term "intra and inter-regional transit" and instead use "local and regional transit" to be consistent with the current usage by stakeholders in the region.

2.2.4 Transit Corridors and Station Areas

Priority Transit Corridors:

- We welcome the introduction of "priority transit corridors" and the emphasis on the alignment of transit-related planning, zoning and development efforts along these corridors. As growth occurs, development pressure on transit corridors will grow and have to be managed.
- Priority transit corridors are a focus for planning, investment and protection. They may also be a focus for intensification. However, Growth Plan policies should recognize that corridors differ: intensification may be desirable for the Eglinton LRT, an arterial road, whereas it would be less important along rail corridors, such as between GO stations.
- Policies about the provincial authority to identify additional priority transit corridors (2.2.4.10; 5.2.2.2) should be rephrased to add that this would be done in consultation with municipalities and Metrolinx. Similarly, policy 3.2.5.1(b) should be redrafted to include similar language, e.g., "... ensure that existing and planned corridors are protected to meet current and projected needs in accordance with the transportation and infrastructure corridor protection policies in the PPS and in consultation with the Province and Metrolinx;"
- Priority transit corridors should be clearly defined (see Definitions, below) and identified in the Growth Plan and supported by discussion of how they will help support regional implementation of GO RER – for example, identifying their role in supporting improved linkages between local transit and GO stations.
 - By aligning with the corridors identified in RTP Discussion Paper (e.g. future rapid transit) in Schedule 5, the Province will also raise awareness among any parties that have interfacing projects with the corridor, helping to align potential development with transit planning, so as to prevent running into costly issues when it comes time for transit project implementation (see the attached Map of Regional Transit in the GGH, Appendix 2).

- In addition, corridor protection and management is important to Metrolinx due the permanency of land uses that encroach on or falls fully along a corridor. Corridor protection policies and those that encourage proximity of linear infrastructure are welcome as they clarify requirements to protect infrastructure corridors and support the movement of goods as well as to support implementation of the GO RER program service expansion.
- We strongly recommend a redrafting of Schedule 5 to align with the attached Map (Appendix 2), which identifies the GTHA rapid transit network in 2025 (funded and completed projects) as well as projects under development, and was developed with the Ministry of Transportation. The Schedule also needs to be updated for accuracy:
 - Schedule 5 more or less aligns with the committed rapid transit projects but is no longer current. It excludes the unfunded next wave projects. Schedule 5 should also include corridors with existing higher-order transit (i.e. the existing subway network).
 - Some terminology in the legend is confusing and inconsistent with the Growth Plan and the RTP:
 - A full definition of a “priority transit corridor” should be included, and clarify how it would differ from what the Province typically refers to as a “higher-order” or “rapid transit” corridor.
 - The wording about the “proposed airport” and “future HSR rail corridor” is misleading, making it appear that high-speed rail is more of a certainty than the airport.
 - There are some technical issues with the map: symbols that are not in the legend; some shapes are distorted, and so on.
- The priority transit corridor policy (proposed 2.2.4) should be expanded to include the following, to read, “In planning lands adjacent to, or in the vicinity of, higher order transit corridors and facilities and transportation systems, municipalities will identify and protect lands that are and/or may be needed for future enhancement or expansion of rail facilities and associated operations, in consultation with Metrolinx, as appropriate.”

Major Transit Station Areas (MTSAs):

- MTSAs are particularly important to Metrolinx in the context of the GO RER program, given the level of transit service that is planned for them and the development potential around them. As the GO Rail Parking and Station Access Plan emphasizes, the success of RER depends largely on the ability to attract more people to GO stations than currently allows.
- The new MTSA targets should be revised and accompanied by guidance materials to municipalities that recognize the variation in local conditions, and as a result “one size will not fit all”. Municipalities (and Metrolinx) require flexibility at individual stations, taking into account the characteristics and the development potential of each (e.g. surface parking at GO stations).
- In addition, development along some related transit corridors, stations and hubs should be prioritized by municipalities, as future growth cannot take place everywhere and still achieve the goals of the Growth Plan, or of the RTP. We also believe that concentrated density at these locations is not likely *in itself* to lead to an increase in transit mode share. There are many examples of stations (e.g. Bloor-Danforth subway) that do not have high density at their immediate location, but are successful at drawing significant ridership, and function as important centres of connectivity (e.g. for buses bringing morning peak commuters to rapid transit). The Growth Plan should provide additional policy that speaks to the quality these places – the urban design, land uses, street typologies and so on – that will make MTSAs successful. That is, greater recognition in the Growth

Plan of the conditions that need to be in place to create transit-supportive conditions near/connected to station areas, beyond density, is important to include.

- In addition, the MTSA policies could be expanded to encourage municipalities to strive for seamless integration of modes at stations, the safe and efficient movement of people with high levels of pedestrian priority, strategic parking management and other factors that are important to support transit use, as described in the RTP Discussion Paper.
- MTSAs should be more clearly distinguished from mobility hubs, community hubs, strategic growth areas and other key concepts presented in the proposed Growth Plan.
- Finally, clarity on how municipalities should work with Metrolinx to determine the size and shape of their MTSAs would be welcomed.
- From a climate change mitigation perspective there are also opportunities for integrating MTSAs and mobility/community hubs with surrounding land uses that reduce GHG emissions that could be introduced in this section, including:
 - EV charging stations;
 - Feeding electricity from renewable sources and/or combined heat and power systems into the grid; and
 - Consideration of first and last mile travel options, and opportunities for shared mobility.

Mobility Hubs:

- We appreciate the inclusion of the mobility hub concept in the proposed Growth Plan. We have included several suggestions to refine this policy area even further.
- As we noted in our 2015 submission, over a third of the mobility hubs identified in *The Big Move* are within or in close proximity to UGCs. There is still an opportunity to better identify MTSAs and/or mobility hubs that are particularly significant to the regional rapid transit system and align intensification strategies with the transit service that is currently provided and planned for the future. As discussed above, we believe priority corridors, stations and hubs should be identified; this is also the case for mobility hubs, which will be addressed in the next RTP. The Growth Plan could focus on providing targets for those MTSAs that are along priority transit corridors (i.e. those with committed funding).
- Metrolinx has developed guidelines for mobility hub development to ensure that over time they demonstrate place-making and seamless mobility objectives. The identification of (priority) mobility hubs with corresponding policy direction in the Growth Plan, to align with the directions for urban growth centres and major transit station areas, would establish the most important nodes in the regional transportation network to which investment should be directed – that is, where it can have the greatest overall impact on our shared goals for mobility in the region. The most appropriate place for this reference may be in the Definitions section, which could also include reference to use of the Transit-Supportive Land Use Guidelines at these locations.
- The availability of low-cost or free parking is a major impediment to achieving the vision of the Growth Plan. Policies could offer more direction on parking at MTSAs, for example, to ensure that policies support local and regional transportation objectives, while incorporating as much site-specific flexibility as possible. For example, a policy for reduced parking requirements near MTSAs could be mandated (and not required in other locations) within a municipality.

- Mobility hubs could also be identified in a Schedule.
- We recommend that the definition of mobility hubs be amended to reflect the research and technical analysis undertaken since the concept was first introduced in *The Big Move* (see Definitions, below). This includes the Mobility Hub Guidelines, Mobility Hub profiles and the updated GO Station Parking and Access Plan.

Strategic Growth Areas:

- As noted above, some of the new terminology introduced in the proposed Growth Plan may cause confusion in interpretation. This comment also applies to Strategic Growth Areas and how they are intended to be implemented. For example:
 - Are these still intended to be a focus of intensification, or has the term changed to indicate a greater interest in accommodating growth?
 - How do SGAs and MTSAs or mobility hubs relate to each other? A graphic representation may help to convey these concepts.
 - How is it envisioned that SGAs would be serviced by municipal transit and be accessible by active transportation?

2.2.5 Employment

- As noted in the General Comments section above, the new major office policies are a welcome addition as they will help to ensure alignment with the GO RER program, new rapid transit and other initiatives that will have to support growth over the long-term.
- We recommend that proposed policy 2.2.5 (re: employment areas) be amended to acknowledge that the policies here should apply not just to office parks but other employment-based trip generators, and should incorporate more transportation demand management (TDM). This policy should be amended to read, “Existing office parks and significant trip generators will be supported by: ... c) planning for intensification of employment uses that will support the regional transportation system with more transit supportive development and mandatory transportation demand management plans. ...”
- The Growth Plan should continue to support TDM for existing office locations, and continue to promote mode shift through efforts such as by encouraging municipalities to require minimum parking requirements and TDM in large site-plan applications, and developers of new office locations to provide TDM in their plans.
- We suggest that policy 2.2.5.9 be amended to read, “Major office and appropriate major institutional development will be directed to urban growth centres, major transit station areas or other strategic growth areas with existing or committed rapid transit” (rather than using “planned frequent transit service”).
- Generally, avoid use of the term “planned” regarding transit; for consistency with the terminology used by the Ministry of Transportation and Metrolinx (e.g. see 2.2.8.2(a) the word “committed” should be used). In addition, we suggest de-coupling policy related to infrastructure from policy related to service, as transit service levels are not fixed and typically, service would follow intensification on a priority transit corridor, to meet demand.
- TDM-related language could be strengthened (from “should” to “will” – e.g. proposed 2.2.5.10). Also, this policy 2.2.5.10 (b) should reconsider emphasizing “open space” to serve the workforce when the rest of the policy is around encouraging intensification and transit-supportiveness .

- In effect, the Growth Plan can help to leverage the provincial infrastructure investment in transit by ensuring TDM is integrated into new development, particularly along priority transit corridors that provide access to employment areas.

2.2.7 Designated Greenfield Areas

- Section 2.2.7.3 reads “The minimum density target will be measured over the entire designated greenfield area of each upper- or single-tier municipality, excluding the following: (a) natural heritage features and areas... (b) rights-of-way for ... (c) prime employment areas

This policy should provide additional text related to corridors to support the GO RER program:

(d) lands used for:

i. electricity transmission lines;

ii. energy transmission pipelines;

iii. freeways, as defined by and mapped as part of the Ontario Road Network; and

iv. rail facilities.

2.2.8 Settlement Area Boundary Expansion

We suggest amending 2.2.8.2:

(a) use the word “committed” in place of “planned”; and

(b) clarify the term “financially viable”. Also in this policy, we suggest including a reference to business cases in the list of mechanisms (in addition to asset management planning and revenue generation analysis).

2.2.9 Rural Areas

There is potential for TDM and shared mobility to work effectively in rural locations where transit provision is not a viable option. We recommend policies in this area encourage municipalities to be aware of emerging technology and business models that may help to reduce dependence on the automobile.

Section 3: INFRASTRUCTURE TO SUPPORT GROWTH

3.1 Context

As Metrolinx embarks on the massive transformation of the GO rail network and rapid transit expansion across the region, supportive infrastructure policies for transportation and land use are crucial. As we noted in our 2015 submission, maximizing the value of GO RER and other transit investments is a priority. GO RER will build on all the planning and infrastructure progress we have collectively made and fast-track future service expansion. Today we have over 200 projects worth over \$16 billion already underway.

We welcome the renewed emphasis in the proposed Growth Plan (echoed in the RTP Discussion Paper) on (1) leveraging the transportation investments made to date, and (2) improving regional connectivity and integration. We are also pleased to see that the Growth Plan will require that provincial services be provided in transit-supportive locations. This could be further enhanced with policies that identify priority corridors that align with key locations, for focusing various levels and types of intensification.

Greater discussion of how infrastructure investments will shape growth could be provided (paragraph 4). There would also be some value in making a clear statement that scattering growth around the region will not support the transportation system in the way that targeted intensification and investment will (paragraph 6).

3.2 Policies for Infrastructure to Support Growth

3.2.1 Integrated Planning

The Growth Plan will require integrated planning for capital infrastructure; however, consideration of operating costs to service and maintain that infrastructure should be addressed in proposed policy 3.2.1. The RTP Discussion Paper highlights (pg. 40) that operational considerations must be taken into account if there is to be a significant increase in transit mode share in the GTHA over the long-term. Increases in operating costs are generally related to service improvements that in turn can lead to ridership growth, but this opportunity is not optimized when operating revenue does not keep pace and cost-recovery is not achievable.

New text should also be added to 3.2.1.5 (Integrated Planning): i.e. The Province will work with public sector partners, including Metrolinx, to identify and protect strategic infrastructure needs to support the implementation of this Plan through multi-year infrastructure planning for the transportation system and public service facilities.”

3.2.2 Transportation - General

- Proposed policy 3.2.2.2 should be expanded to include mention of the infrastructure required to support active transportation. Policy 3.2.2.4 should read as, “Municipalities will develop and implement transportation demand management policies in official plans or other planning documents or programs to:
 - Reduce trip distance and time;
 - Increase the modal share of alternatives to the automobile, which may include setting modal share targets;
 - Prioritize active transportation, transit and goods movement over single-occupant automobiles;
 - Support the introduction and expansion of active transportation infrastructure; and
 - Target significant trip generators.
- 3.2.2.3 should be clarified as it reads currently that every street would be designed as a complete street. Some clarity should be provided regarding where it is appropriate.
- From a sustainability perspective, policies for infrastructure represent an opportunity for the Province to support Metrolinx’s commitment to work more closely with communities, such as through community benefit agreements, as outlined in our Sustainability Strategy 2015-2020 and our Community Charter (due in 2017). As the RTP is guided by the Growth Plan, it is important that the updated Growth Plan recognizing community benefits.

3.2.3 Moving People

- The Growth Plan’s chapter on Infrastructure to Support Growth provides an opportunity to recognize corridor protection. Section 3.2.3 (Moving People) should include this by adding the following text, “Municipalities will work with transit operators, the Province, Metrolinx where applicable, and each other to support and protect *transit service integration* within and across municipal boundaries.”

- We agree that transit planning and investment decisions should be guided by clear criteria, as outlined in our comments above. To this end, we recommend that proposed policy 3.2.3.2 be redrafted to include funded transit corridors and stations as the first priority among the criteria listed. In addition, the set of criteria should be expanded to present the full range of justifications for why we are investing in public transit - including serving vulnerable populations and meeting social equity objectives, saving travel time for passengers, serving major institutions, and others. The RTP Discussion Paper touches on many of these additional considerations.

3.2.4 Moving Goods

- We appreciate the ongoing recognition of goods movement in the context of urban growth, intensification and mobility in the region. We suggest that the reference to the goods movement network in the Context section of section 3 (paragraph 9) be redrafted to clarify who is/should be doing this work and what it consists of. If this is a reference to a regional truck and rail freight network study that has been done to support the RTP review, Metrolinx, MTO and regional partners should also be acknowledged in the Growth Plan (consider placing in the Context text for section 3). Schedule 6 would also need to be updated to reflect this work.
- In our prior submission (July 2015), we emphasized the importance of efficient goods movement as key to the overall health of the regional transportation system, and so recommended policies should be adopted that encourage more effective use of road space (such as for deliveries).
- It is unclear if in the proposed policies will support the clustering of industries that can reduce the overall need for goods to be transported over long distances.
- Proposed policy 3.2.4.3 should include coordination across municipalities and include highways in the network.

3.2.5 Infrastructure Corridors

- The encouragement of co-locating linear infrastructure is welcome; there is potential here to support active transportation (e.g. creating cross-boundary cycle paths or cycle highways alongside rapid transit/GO RER for those commuting more than 5 kilometres). It can also be coordinated with utilities. This has been successful in many jurisdictions, including in Toronto (e.g. the West Toronto Rail Path).
- These policies should recognize the need to protect not only for future rail corridors but also for potential rail facilities, including protection from adjacent incompatible uses.

3.2.8 Public Service Facilities

- Metrolinx supports locating services and facilities that are funded publicly in places that are accessible by public transit and active transportation. The Province should demonstrate leadership and set an example for other governments to follow.
- We recommend that the use of the term “community hub” and its relationship to mobility hubs, strategic growth areas and other concepts in the plan be clarified.
- The Growth Plan should additionally recognize that the location of neighbourhood- or community-based public amenities like local schools can have an influence on existing travel patterns as well as the future habits and transportation choices of today’s children.

Section 4. PROTECTING WHAT IS VALUABLE

- The Growth Plan also highlights for us the importance of resiliency to extreme weather and climate change, particularly the interrelationship and interdependency between transit infrastructure and stormwater management. As infrastructure assets, including stations, facilities, and rail/transit corridors may be at flood risk to riverine flooding and overland/urban, stormwater flows, we support the proposed policy changes that are directed at reducing flood risk vulnerability for existing infrastructure and future/planned development, including:
 - mitigating climate change risks through vulnerability assessments;
 - requirements for stormwater master plans to be completed that are informed by watershed planning, including consideration for the use of low impact development and/or green infrastructure;
 - as part of municipal asset management planning, municipalities will assess infrastructure vulnerability and identify priority actions and investments to increase infrastructure resilience and adapt to a changing climate; and
 - that municipalities are encouraged to develop strategies to improve resilience to climate change through planning for infrastructure, including transit and energy, in an integrated manner.
- From a resiliency and adaptation perspective flood risk for Metrolinx assets can be reduced by enhanced stormwater management practices and the implementation of low impact development and/or green infrastructure measures in surrounding municipal land uses. Corridor protection needs to extend to environmental influences on the corridor in the context of climate change. The Growth Plan should ensure that future land uses do not allow that infrastructure in rail corridors such as in urban river valleys to be at risk (e.g. risk of flooding).
- As transit is the first priority for transportation planning and investment, it is essential that the transportation system for the Greater Golden Horseshoe be planned and managed in a manner that reduces GHG emissions and other environmental impacts. There are a number of proposed policy changes/additions directed at the Province and municipalities that will enhance our ability to do this. However, calculating GHG reductions based on changing transportation behaviours will be difficult to quantify without standard methodology with third party verification. We recommend proposed policy 4.2.10.2 be revisited. The policy could be amended to read: “In planning to reduce greenhouse gas emissions and address the impacts of climate change, municipalities are encouraged to: ... (c) establish municipal interim and long-term greenhouse gas emission reduction targets with third-party verification that support provincial targets and reflect consideration of the goal of *net-zero communities*, and monitor and report on progress made towards the achievement of these targets.

DEFINITIONS

Although efforts have been made to improve and add definitions to the proposed Growth Plan, further harmonization with current transportation planning terminology would help municipalities and other partners to implement the Growth Plan (and the RTP). Below, a number of suggested edits are provided, focused on streamlining language and clarifying intent.

Expand **Compact Built Form** - Add a reference to transit, regarding accessibility. For example:

- *A land use pattern that encourages the efficient use of land, walkable neighbourhoods, mixed land uses all within one neighbourhood, proximity to transit and reduced need infrastructure.... Walkable neighbourhoods can be characterized by roads laid out in a well-connected network, destinations that are accessible by transit and active transportation....*

Expand **Complete Communities** - Include transportation in the definition. For example:

- *Places such as mixed-use neighbourhoods or other areas within cities, towns and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores and services, a full range of housing, transportation options and public service facilities. Complete communities may take different shapes and forms appropriate to their contexts.*

Add a definition of **Complete Streets** - For example:

- *“Roads that are planned, designed, operated, and maintained to enable safe, convenient and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation. Complete Streets allow for safe travel by those walking, cycling, driving automobiles, riding public transportation, or delivering goods as appropriate.”*

Amend **Frequent Transit** -

- We recommend either removing the term “frequent transit”, or make the following changes:
- Use the full term, and use it consistently: i.e. “Frequent Transit Service”.
- Add text to acknowledge that “frequent” transit service is relative depending on the community context. For example: “A public transit service that ~~runs~~ operates at least approximately every 10 to 15 minutes (or more often) from the morning peak to early evening, or later.”
- The definition could also include some descriptive text that explains why frequency matters - for example, “Frequency is a key consideration in growing ridership. If it facilitates easy connections, a frequent transit network can be developed within a region’s wider transportation system.”

Clarify **Higher Order Transit** - Incorporate rapid transit, for example:

Proposed Growth Plan	Recommended text
Transit that generally operates in its own dedicated right-of-way, outside of mixed traffic, and therefore can achieve a frequency of service greater than mixed-traffic transit. <i>Higher order transit</i> can include heavy rail (such as subways and inter-city rail), light rail, and buses in dedicated rights-of-way.	Roads and railways where the transit service is partially or completely separated from general vehicular traffic and therefore able to maintain higher levels of speed and reliability than can be achieved by operating in mixed traffic. Includes all forms of rapid transit; terms are often used interchangeably.

Streamline **Major Transit Station Area** - We suggest excluding transit *stops* to reduce confusion, as this section currently reads as though all rapid transit stations and stops will be MTSAs, and that it is always desirable to have intensification between stations in a linear fashion. Simplifying language will make it easier for the reader to distinguish MTSAs from other designations in the Growth Plan.

Proposed Growth Plan	Recommended text
The area including and around any existing or planned <i>higher order transit</i> station or stop within a <i>settlement area</i> ; or the area including and around a major bus depot in an urban core. <i>Major transit station areas</i> generally are defined as the area within an approximate 500m radius of a transit station, representing about a 10-minute walk.	Existing or planned station areas (within an approximate 500 metre radius) often located in strategic growth areas such as mobility hubs and urban growth centres.

Amend **Mobility Hubs** - We recommend rephrasing this definition to reflect current Metrolinx work on mobility hubs. We also request that specific reference to “The Big Move” not be included, as the next RTP will have a different title. Also, in the Mobility Hub Guidelines a 500m radius is considered a 5-minute walk, with an 800m radius being a 10-minute walk. While these numbers are only indicative, they should be consistent with the material previously published by Metrolinx.

Proposed Growth Plan	Recommended text
<i>Major transit station areas</i> that are particularly significant given the level of transit service that is planned for them and the development potential around them. <i>Mobility hubs</i> are identified in The Big Move, a Regional Transportation Plan for the Greater Toronto and Hamilton Area and can also be identified in accordance with policy 2.2.4.10.	Mobility hubs are major transit stations and the surrounding areas (up to an 800 metre radius or 10-minute walk) that serve a critical function in the regional transportation system, given the level of transit service that is planned for them and the development potential around them. They are, or are planned to be, places of connectivity where various modes of transportation come together seamlessly, with intensive opportunities to work, live, shop and/or play. <i>Mobility hubs</i> are identified in The Big Move , a the Regional Transportation Plan for the Greater Toronto and Hamilton Area and can also be identified in accordance with policy 2.2.4.10.

Amend **Multimodal** – Recommend replacing the PPS, 2014 definition with one that distinguishes vehicles from the activity of using a mode:

PPS, 2014	Recommended text
Relating to the availability or use of more than one form of transportation, such as automobiles, walking, cycling, buses, rapid transit, rail (such as commuter and freight), trucks, air and marine. (PPS, 2014)	Having more than one mode or form of transportation, such as driving, taking transit, cycling or walking, OR Having more than one mode or form of transportation, such as motorized vehicles (such as trucks, cars, buses and trains), bicycles, and foot.

Elaborate on **Priority Transit Corridors** – This definition would benefit from further explanation, to clarify roles and align with the language in both the Growth Plan and the RTP:

Proposed in Growth Plan	Recommended text
Emerging <i>higher order transit</i> corridors identified as a focus for planning and <i>intensification</i> . <i>Priority transit corridors</i> are shown in Schedule 5 and can also be identified in accordance with policy 2.2.4.10.	Higher-order (or “rapid transit”) thoroughfares where transit service is partially or completely separated (on roads or rail) from general vehicular traffic and therefore able to maintain higher levels of speed and reliability than can be achieved by operating in mixed traffic. Priority transit corridors are existing and/or committed road or rail corridors that are a focus for planning, investment and protection. They may also be a focus for intensification. See Schedule 5 for committed, funded rapid transit corridors to 2025. Priority transit corridors are also identified in the <i>Regional Transportation Plan</i> for the Greater Toronto and Hamilton Area.

Adjust **Strategic Growth Areas** - Recommend adding “priority transit corridors” in the definition, to be consistent with its usage in the proposed Growth Plan. For example,

- “... Lands along major roads, arterials or other areas with existing or planned *frequent transit service* or ~~higher order~~ *priority transit corridors* may also be identified as *strategic growth areas*.”

Clarify use of term **Transit Service Integration** on page 28 – While the definition of the term is clear, its use on page 28 is confusing. Suggest redrafting as:

- “System users will benefit from ~~improved linkages between and within municipalities as well as transit service integration~~”, to avoid redundancy.

Expand **Transportation Demand Management** – The 2006 Growth Plan definition included examples that were helpful for local implementation; these should be retained in the 2017 Growth Plan. Text should read: “Examples include: carpooling, vanpooling, and shuttle buses; parking management; site design and on-site facilities that support transit and walking; bicycle facilities and programs; pricing (road tolls or transit discounts); flexible working hours; telecommuting; high occupancy vehicle lanes; park-and-ride; incentives for ride-sharing, using transit, walking and cycling; initiatives to discourage drive-alone trips by residents, employees, visitors, and students.”

Amend **Transportation System** - Drawn from the PPS, 2014, this definition is already dated and excludes key components of the region’s transportation system (e.g. rapid transit, MTSAs, mobility hubs, etc.) and consistency with Growth Plan terminology, like “priority transit corridors”. In addition, it is missing mention of rail yards. We recommend that, as with many other definitions provided in the proposed Growth Plan, a unique definition specific to the GGH be developed and utilized.

PPS, 2014	Recommended Text
A system consisting of facilities, corridors and rights-of-way for the movement of people and goods, and associated transportation facilities including transit stops and stations,	A coordinated multimodal network of transportation infrastructure - corridors and facilities - including provincial highways, municipal expressways, roadways, rapid transit ways, railways, public transit stations and stops, Union

sidewalks, cycle lanes, bus lanes, high occupancy vehicle lanes, rail facilities, parking facilities, park-and-ride lots, service centres, rest stops, vehicle inspection stations, inter-modal facilities, harbours, airports, marine facilities, ferries, canals and associated facilities such as storage and maintenance. (PPS, 2014)

Station, bike lanes, sidewalks, parking lots, rail yards* and intermodal terminals. The transportation system integrates the various transportation networks to facilitate the movement of people and goods throughout the region and connects to crucial infrastructure outside the GGH to support economic prosperity including borders, ports and airports.

**While the PPS includes a definition for “Rail Facilities” (“rail corridors, rail sidings, train stations, inter-modal facilities, rail yards and associated uses, including designated lands for future rail facilities), we also recommend adding Rail Facilities as a defined term in the Growth Plan.*

Clarify Trip Generators – Trip generators, in transportation planning, are typically origins and destinations (i.e. trips must have a beginning and an end). Recommend adding “origins”.

APPENDIX 2: Map of Regional Transit in the Greater Golden Horseshoe

Note: Source files will be forwarded separately by staff

