WALK TORONTO COMMENTS ON BILL 57,

RESTORING TRUST, TRANSPARENCY AND ACCOUNTABILITY ACT, 2018

To: Members of the Standing Committee on Finance and Economic Affairs;
The Honourable Victor Fedeli;
The Honourable Jeff Yurek
From: Walk Toronto, members of the steering committee
Date: Dec. 3, 2018

Walk Toronto is a grassroots pedestrian advocacy group that works with various levels of government, community groups and citizens to improve walking conditions and safety in Toronto.

RECOMMENDATIONS

Walk Toronto's main concern with Bill 57, *Restoring Trust, Transparency and Accountability Act, 2018,* is in regards to Schedule 25 [1], which amends the *Metrolinx Act, 2006.*[2] **We recommend that section 2 of Bill 57 (p. 64-66) be stricken out, and that the original provisions of sections 5 and 6 of the *Metrolinx Act, 2006* be preserved in their entirety.**

The original 2006 Act sets out the scope of Metrolinx's activities broadly as a corporation that is working toward an "integrated, **multimodal** transportation network". In contrast, Bill 57's proposed amendment considerably narrows Metrolinx's remit to "an integrated **transit** network in the regional transportation area". Furthermore, Bill 57 eliminates references in the original Act to taking into consideration all modes of transportation, including walking and cycling. Also removed is the requirement for Metrolinx to work toward reducing transportation-related air pollution and greenhouse gases.

In our view, this narrowing of the focus of Metrolinx's activities will lead to:

- Disinvestment in the provision of 'first and last mile' access to GO stations and surface transit stops for pedestrians, leading to

[1] http://www.ola.org/en/legislative-business/bills/parliament-42/session-1/bill-57
[2] https://du0tsrdospf80.cloudfront.net/docs/06g16_e.doc

- A more dangerous, stressful, polluted and less convenient walking experience for those GO customers who still choose to begin and/or end their trip on foot
- A decrease in the viability of any future, transit-oriented development, the success of which relies not just on good transit but also on good pedestrian connections
- An increase in vehicular congestion both at and within the general proximity of GO stations
- A significant rise in the need for additional parking for GO customers, resulting in Inflated costs of up to $1 billion
- A shifting of resources towards the periphery of GO's catchment area at the expense of major urban areas (which are particularly dependent on multimodal access) …
- Putting the prospects of projects such as SmartTrack at risk

FIRST AND LAST MILE

An integrated transit network involves feeding local transit routes into stations on longer rapid transit lines (which are often regional in scale). With the exception of paratransit, most transit in southern Ontario does not currently provide seamless, door to door service[3]. Consequently, it is necessary for GO customers to cover the 'first and last mile' by multimodal means: walking, cycling, private automobile, taxi, etc.

While it may seem to make sense for Metrolinx to concentrate on its core business, transit, the reality is that **a whopping 91.5% of its customers currently access the GO system by transportation modes other than transit**.[4] Today, multimodality is totally dominant and this fact should be recognized in the *Metrolinx Act, 2006*. Walk Toronto does not see any justification in removing references to pedestrians when their mode share is exactly the same as those who use feeder transit – 8.5%. We are in full agreement with Metrolinx's existing policy:

> Supporting pedestrian access to GO stations is a key priority for Metrolinx. Walking is the most cost-effective means of accessing the GO rail network, as it requires minimal station infrastructure and allows for the efficient use of Metrolinx assets and its station properties.[5]

SELF-RELIANCE AND INDEPENDENCE

As a rule of thumb, most people are willing to walk distances of up to about 800 metres from their home to rapid transit; and about 400 metres from transit to a job or class.[6] These station-concentric zones are known as "walksheds". Walk Toronto encourages people to access GO on foot when the walksheds align properly. Walking is a low-impact, healthy activity that also has positive psychological and social benefits. In particular, the life outcomes of vulnerable members of society such as seniors, children and people with disabilities are more favourable if they can get about on their own steam rather than be chauffeured everywhere. (Of course this not always possible.)

In order to facilitate direct, safe, accessible and convenient pedestrian access to stations, it is necessary to ensure that certain measures are implemented that are not directly related to operating feeder transit:

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[3] This could change when snow, ice and the many other obstacles in the way of Level 5 of shared autonomous vehicles are eventually overcome.

[4] "GO Rail Station Access Plan. Final Report" (Metrolinx, December 12, 2016) p. 4

[5] Ibid., p. 26

[6] Erick Guerra; Robert Cervero, "Is a Half-Mile Circle the Right Standard for TODs?". ACCESS: the Magazine of UCTC (Spring 2013, no. 43) http://web.archive.org/web/20130804141425/http://www.uctc.net/access/42/access42_halfmiletods.shtml

- Ensure adequate street furniture, pedestrian wayfinding, benches, trees, plantings, etc.in the vicinity of the station
- In designing new stations, minimize the distance between train platforms/bus bays and the street
- With older stations, where pedestrians must run the gauntlet through large parking lots, provide accessible walking routes and underpasses that minimize conflicts with vehicles
- Provide continuous, accessible sidewalk and walkway connections to local streets
- In the winter, clear snow promptly from pedestrian routes as well as from neighbourhood sidewalks

These actions are basic to the design and maintenance of a high quality, multimodal transportation system that can be used by vulnerable users in a northern country such as Canada. The costs are relatively moderate compared to, say, $40,000 for building a single parking space in a multi-tier garage. Even so, pedestrian infrastructure and operations might be susceptible to cost-cutting if multimodality is moved beyond the mandate of Metrolinx by Bill 57.

GO STATION PARKING

Metrolinx's Regional Express Rail (RER) plan will significantly increase passenger volumes on its rail routes, especially for reverse commuters and off-peak users. 62% of GO rail users currently drive to the station and park there. What will happen if they continue to do this throughout the next dozen years of RER expansion?

> GO rail ridership is projected to more than double from an average of close to 100,000 daily weekday riders in 2016 to 225,000- 250,000 weekday riders in 2031. ... Approximately 85% of station parking lots are at or near capacity and the time required to find a parking spot, as well as levels of illegal parking, are increasing. If current station access patterns remain unchanged to 2031, GO rail stations would need approximately 75,000 to 80,000 additional parking spaces. This level of parking expansion would be financially unsustainable.[7]

It would also be unsustainable from the spatial perspective. The *Globe and Mail* frames the problem vividly:

> Metrolinx chief planning officer Leslie Woo said this pattern can't continue. "We [analyzed] one station, **we took Unionville, and if we kept expanding surface parking at the rate that we've been adding, that we would be adding riders, we'd need a site the size of Canada's Wonderland,**""[8] [Bolding emphasis by WT]

This alarming situation induced Metrolinx to take a long look at its options, and earlier this year it released a new Regional Transportation Plan ("2041 RTP").

> **The 2041 RTP is the result of more than three years of research, analysis, consultation and coordination.** The 2041 RTP is a plan for the entire region that was developed through extensive consultation with our provincial and municipal partners, stakeholders (interested organizations, groups and individuals) and the public. The 2041 RTP is focused on the needs of travellers and supports a high quality of life, a prosperous economy and a healthy environment. ... The 2041 RTP was informed by the latest technical research and analysis on a wide variety of transportation topics, including autonomous vehicles; active transportation; the regional economy, demographic outlook and land use; transit needs;

[7] "2016 GO Rail Station Access Plan". Final report (Metrolinx, Dec. 12, 2016) p. 2
[8] "Go Transit calls time on free parking", Oliver Moore. *The Globe and Mail,* April 6, 2018

goods movement and more. It was also informed by academic research conducted in partnership with the University of Toronto, York University, Ryerson University, and the University of Waterloo.[9]

One of the conclusions of the carefully considered 2041 RTP starkly contradicts the thrust of Bill 57 to eliminate multimodality:

> New rapid transit projects across the GTHA will bring quality transit services closer to many more people and jobs. Maximizing the use of these new services will require a renewed emphasis on providing multimodal options for the first- and last-mile of every passenger trip. It is not sustainable to rely primarily on rapid transit users driving to stations and parking for free. New solutions are needed.[10]

The "GO Rail Station Access Plan" is a related study that lists a wealth of solutions meant to enhance pedestrian access (amongst other improvements) on a station-by-station basis. It also bites the bullet on the projected extra 75,000 to 80,000 parking spaces for GO customers that Metrolinx may have to provide if current access patterns remain unchanged into 2031. Instead, Metrolinx recommends that only 24,000 parking spaces should be built within this period: 14,700 surface spaces and 9,300 within parking structures such as garages.[11] This means that if no effort is made to change the transportation mode by which GO customers access stations, then **it may be necessary to build an additional 51,000 to 56,000 spaces beyond what GO is recommending.**

Although many GO stations were originally built as greenfield projects, in the intervening years most have become surrounded by sprawling, low-density development. This makes it difficult to expand surface parking.

The alternative to surface parking is the multi-tier garage structure. A 1,200-space garage that opened at Pickering in 2014 cost over $39,00 per parking space.[12] Let us conservatively assume that if Metrolinx builds a mix of surface and structure parking facilities, the average cost will be approximately $20,000 per parking space. **One of the main goals of Metrolinx's 2041 RTP policy of promoting multimodality was to reduce demand for station parking. The financial consequence of abandoning this goal is an increase in capital costs for providing extra parking capacity that could amount to as much as $1,070,000,00.[13] Bumping up the RTP budget by an extra billion dollars is not trivial, and it flatly contradicts the ostensible purpose of Bill 57 to save the Province money.**

There are various tools available to cover the additional costs, but we suspect that the first four will be politically problematic:

1. Pay out of the province's general revenues. (The intention of the present Government is to trim its budget, not add to expenses.)
2. Increase the price of GO tickets. (This would unfairly penalize customers who do not park cars, and may result in those that do to turn their backs on GO and drive the entire length of their journey, worsening road congestion.)
3. Charge for GO parking on a full cost recovery basis. (Again, the consequence would be a loss of GO customers.)

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[9] Webpage: "Developing the RTP". http://www.metrolinx.com/en/regionalplanning/rtp/review.aspx

[10] "Metrolinx 2041 Regional Transportation Plan For the Greater Toronto and Hamilton Area". (Metrolinx, March 2018) .p. 68 http://www.metrolinx.com/en/docs/pdf/board_agenda/20180308/20180308_BoardMtg_Draft_Final_2041_RTP_EN.pdf

[11] "Go Rail Station Access Plan" (Metrolinx, 2016), Appendix B, p.4,

[12] "GO Transit and the high cost of "free" parking". Marshall's Musings blog, Nov. 12, 2015 http://seanmarshall.ca/2015/11/12/go-transit-and-the-high-cost-of-free-parking

[13] Average of 51,000 and 56,000 = 53,500 x $20,000 = $1,070,000,000

4. Charge for GO parking and also impose highway tolls and congestion charges high enough to make GO less expensive than driving for the entirety of a trip. (We assume that the present Government would not be amenable to this scenario.)
5. Commit to multimodal access as the means to encourage GO ridership growth in a sustainable and financially responsible way. This reduces the need for surface station parking, and enables alternate, more cost-efficient ways to store cars.

TRANSIT-ORIENTED DEVELOPMENT

The value of the land surrounding rapid transit stations is significantly enhanced by its close proximity to rapid transit. **When publicly owned land is devoted to (mostly) free surface parking its value is not fully captured. From the market perspective, this is a poor business strategy**. Consequently, many enlightened transit authorities – including Metrolinx – are developing plans to convert surface parking to transit-oriented development that monetizes the value of under-utilized public land within walking distance of transit.

> Transit Oriented Development (TOD) is higher density, mixed-use development that is connected, next to or within a short walk of transit stations & stops, and is designed to encourage transit use. [14]

GO users benefit from transit-oriented development in many ways:

- Retail stores and services can be efficiently visited while accessing transit. One reason given by motorists for their preference for driving is that it is easy for them to 'trip-chain' visits to neighbourhood stores while driving to/ from rapid transit. But if they can get a coffee, drop off dry cleaning or buy a few groceries right at the GO station, they will be more apt to leave their car at home.
- Residential buildings near rapid transit make it very easy for the people who dwell in them to walk to their train or bus. This is the ultimate in doing the so-called 'first mile' quickly.
- Trudging through parking lots can be bleak and dangerous for pedestrians. Their experience is enriched if they can walk past useful built form rather than through a sea of parked cars.
- Last but not least, it should be possible for Metrolinx to negotiate agreements with private developers to include commuter parking in garages of transit-oriented development at no cost to the agency. This model can be productive in retrofitting older GO stations.

The value of all of these benefits, however, is contingent on facilitating the multimodal operation of the the rapid transit station and its vicinity. It is worth repeating that this involves giving up prime surface parking space for transit-oriented development.

CONGESTION AND POLLUTION

What will happen if GO ridership more than doubles in the next dozen years, and Metrolinx abandons its current strategy of emphasizing station access through sustainable transportation? **The agency could end up building 53,500 parking spaces that are additional to current plans. GO stations and their vicinity will be clogged with extra traffic, creating congested conditions that will be dangerous for pedestrian and cyclist movement and frustrating for motorists.**

Transportation is the number one source of greenhouse gas emissions in Ontario, responsible for 33% of total emissions in 2015. Bill 57 jettisons the original Metrolinx transportation plan's requirement that Metrolinx work

[14] "Delivering More: A Market Driven Strategy to Delivering Transit Infrastructure." Leslie Woo; Lorrain Huinink; Michael Norton (Metrolinx presentation to be given Dec. 6, 2018)
http://www.metrolinx.com/en/docs/pdf/board_agenda/20181206/20181206_BoardMtg_TOD_Strategy.pdf

towards reducing "transportation-related emissions of smog precursors and greenhouse gases in the regional transportation area." This could cause the agency to become cavalier about being an environmental good citizen. The implications will be especially grave for Ontarians with respiratory conditions – for instance, children with asthma. Also, removing greenhouse gas reduction from Metrolinx's goals will surely be detrimental to Canada's performance in meeting its climate change goals.

SMARTTRACK

GO Transit has always had a regional mandate – as opposed to municipally owned transit authorities such as the TTC. Walk Toronto acknowledges that GO service to many areas on the system's periphery is substandard. As Torontonians who enjoy local transit service throughout the day, we welcome the off-peak improvements that will be brought by RER to smaller cities and towns throughout the Golden Horseshoe.

That being said, we do have concerns about the danger that Bill 57 may bring about a misallocation of resources within Toronto. Plans for the SmartTrack project include approximately 14 stations, most of which will be new and will be located within Toronto's boundaries. The intention is to provide minimal customer parking. If Metrolinx follows the lead of Bill 57, it would concentrate on optimizing local feeder transit connections. But this could be misguided. A 2015 GO Rail Passenger Survey for the Bloor, Danforth and Exhibition GO stations[15] indicates that, on average, only 12.2% of passengers use local feeder transit service, whereas a whopping 82.9% of GO customers accessed the three stations on foot. Admittedly, the locations of some SmartTrack will be less urban than the three just referred to. But the lesson remains the same: the success of SmartTrack relies on investing some of its huge budget multimodally in first class pedestrian infrastructure.

CONCLUSION

Bill 57 narrows Metrolinx's remit from multimodal transportation to just transit. In consequence, the interests of GO customers who access the network as pedestrians may not be properly looked after by Metrolinx in the future. Ridership growth may be managed primarily through parking expansion, which could make GO stations unnecessarily large, congested, unsafe for walking, and polluted. Also, increased parking capacity could open a Pandora's box, imposing enormous additional capital and maintenance costs while at the same time reducing the agency's ability to bring in revenues through transit-oriented development.

Metrolinx's 2041 Regional Transportation Plan was a long time in the making. We should be very careful before we tinker with its carefully worked-out provisions.

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[15] Spadina-Front GO Station Design and Technical Studies. Appendix I: Transportation Brief (Metrolinx, Aug, 2018) p. 8