



To: Infrastructure Canada  
Andy Fillmore, Parliamentary Secretary to the Minister of Infrastructure  
Julie Dabrusin, MP for Toronto-Danforth

From: Walk Toronto

Re: National Active Transportation Strategy

April 18, 2021

Dear Mr. Fillmore and Ms. Dabrusin,

Walk Toronto is a grassroots, volunteer advocacy group dedicated to making Toronto a better city for walking.

We are very pleased to learn of Canada's first dedicated active transportation infrastructure fund, and of the intention to develop a national active transportation strategy. We thank you for inviting a member of our steering committee, Dylan Reid, to participate in the consultation you hosted via Zoom on March 24, 2021. Dylan, in fact, lives in Julie Dabrusin's riding, as do two other members of Walk Toronto's steering committee (Vivien Leong and Mark Jacobs); it is gratifying to see one of our MPs take such a strong interest in this issue.

Walk Toronto has a few specific insights it would like to contribute in light of the consultation event.

**1) Attention to walking as well as cycling**

As was noted towards the end of the consultation, it is vital to make sure that walking is given as much attention as cycling in any active transportation strategy. It was notable that cycling organizations were more numerous and vocal in the discussion, a pattern that we have often observed. Cycling is indeed important, but many more people walk than cycle and it's important to ensure that walking is given equal attention.

**2) Funding walk/cycle bridges and tunnels**

In terms of infrastructure funding, we were pleased to hear Parliamentary Secretary Fillmore give attention to creating and completing networks of routes. A vital element of networks for pedestrians is safe and comfortable access across barriers, such as railways, highways, and waterways. Crossings such as bridges and tunnels are often expensive and a challenge for municipal finances, so federal assistance in building these crossings could make a significance difference. It's worth noting that railways are a federal responsibility, and so developing crossings of railways for pedestrians and cyclists where they interrupt



natural routes (for example, to transit or services) would be a particularly apt use of federal funds.

### **3) Truck side guards**

In terms of developing a federal active transportation strategy, one of the most important federal issues for both pedestrians and cyclists has been mandating truck side guards on all heavy trucks. Cyclist and pedestrian deaths are often caused by being dragged under turning trucks, and multiple coroner and other reports have recommended them as an essential step for active transportation safety. Side guards can help to prevent these tragedies from happening, and are required in many other nations. Requiring side guards on all heavy trucks is a federal responsibility and is long overdue.

*No federal active transportation strategy can be taken seriously if it does not address the need for truck side guards.*

### **4) Other federal regulation of vehicles**

Federal transportation regulation can also play other roles in regulating vehicle design. The increase in pedestrian deaths over the last decade has been attributed in part to an increase in the number of light trucks and SUVs being purchased. With their higher fronts, trucks and SUVs have a harder time seeing pedestrians, and in a collision will tend to knock pedestrians under the wheels, which is more deadly than being knocked onto the hood. The European Union has vehicle design regulations to reduce this risk. Canada could work with the United States to institute similar design regulations in North America to reduce pedestrian deaths. Other vehicle design regulations that could fall under federal regulation could also help improve pedestrian safety, such as improving truck side-mirror requirements and limiting dashboard distractions.

### **5) Equity**

We were pleased to hear Parliamentary Secretary Fillmore bring up the issue of equity and the potential for active transportation to address it. Walking is the most accessible and equitable mode of transportation, but in Toronto many of the lowest-income parts of the city, often home to many new Canadians, are in suburban areas that are particularly unfriendly to walking. As well, it is well established that many equity-seeking groups face additional barriers to walking, such as harassment and racism from both other people and from police, poor maintenance of public infrastructure in their communities, and so on. We urge the infrastructure fund and the future federal active transportation strategy to focus on ways of making walking safer, more convenient, and more appealing for equity-seeking groups and in the most challenging locations.

### **6) Accessibility**



We were pleased to hear accessibility discussed, as that has been a primary concern for Walk Toronto. We have fought numerous battles to, for example, ensure accessible access to recreational trails in Toronto. Currently, access to these trails often presents serious accessibility barriers. Accessibility to trails often requires significant up-front investment, such as creating ramps or switchback trails, so federal funding could be very effective in encouraging Toronto and other cities to make investments in improving accessibility.

#### **7) Integration with transit**

It is often overlooked that most people walk to transit. Transit projects are frequently implemented with little attention to how people will walk to transit stops. The federal government often provides financing to transit projects. A key element of any federal active transportation strategy should be to require “walkshed” planning, and provide funding, to invest in and enhance walking routes to any new transit project. Improving walking access to existing transit would also be a good use of the dedicated active transportation infrastructure fund.

#### **8) No artificial distinction between commuting and recreation**

There was some discussion in the consultation event that sought to distinguish between recreational and commuter active transportation. This distinction comes from the over-emphasis on cycling, where these two uses can be very separate. For walkers, commuting, recreation, and walking for errands such as shopping and services all blend together, and often occupy the same routes. As well, recreational walking is often a gateway to increasing walking for other, more practical purposes. We advise not making an artificial distinction between different kinds of trips. Walking is walking.

#### **9) Small steps and rest areas**

We endorse the point that was brought up at the end of the discussion regarding the frequent need for small but significant improvements to improving walkability, such as providing resting places and better lighting. While these steps are not glamorous, they make a significant difference to encouraging people to walk. Creative ways to use federal funding to enable these kinds of small but significant interventions are encouraged.

#### **10) Further questions**

We have several further questions regarding the funding and the process of developing the strategy.



- How will the funding be applied for and allocated? Will the program work directly with municipalities? Can other organizations apply for it? Is there a formula for allocating the funds among regions and jurisdictions?
- What criteria will be used for deciding which projects get funding?
- Is the funding only for “shovel-ready” projects or can it be used to initiate longer-term projects?
- Will there be a more formal consultation process for developing the strategy? For example, a survey or questionnaire? It’s difficult to provide feedback on an online call with 150 people.
- What is the target date for finalizing the strategy?
- Will the strategy be cross-departmental, incorporating all federal ministries that are relevant?

## **Conclusion**

In many cases, these various points are mutually reinforcing. For example, both bridges/tunnels and small improvements can contribute to improving the “walkshed” for a transit stop; improving accessibility to trails can make walking more appealing in suburban areas, addressing both equity and accessibility.

We look forward to hearing further details that respond to these comments and questions. And, again, we thank the Government of Canada for initiating the first federal funding envelope dedicated to active transportation, and for initiating a long-needed federal active transportation strategy.

Thank you,

Dylan Reid  
On behalf of Walk Toronto