

May 30, 2012

City of Toronto
Metro Hall, 19th Fl., 55 John St
Toronto, ON M5V 3C6

Attn: Jason Diceman, Senior Public Consultation Coordinator

Re: Front Street/Union Station Municipal Class Environmental Assessment

We are the solicitors for Cycle Toronto (formerly the Toronto Cyclists Union). Founded in 2008, Cycle Toronto promotes the safety, legitimacy and accessibility of cycling in Toronto, and currently has over 2,300 paying members.

I have been instructed to express our client's dissatisfaction with the preferred concept ("the Project") selected by the City of Toronto (the "City") through the Environmental Assessment referenced above.

Our client has the following specific concerns:

1. **Lack of bicycle parking** - The Project envisions a small amount of bicycle parking on the cramped and hard-to-access north side of Front Street. In order to encourage combining bicycle and transit trips, it is essential to have a large supply of bicycle parking directly in front of Union Station on the south side of Front Street between York Street and Bay Street (similar to pre-reconstruction conditions).
2. **Lack of bike lanes, and bike-hostile street design** - The selected design does not include bike lanes and the "pinch points" on the roadway will be dangerous for cyclists and reflects out of date urban design concepts. Cycle Toronto acknowledges the importance of accommodating pedestrians, but clearly defined bike lanes would make it easier for pedestrians to cross Front Street safely. A continuous, clearly designated bicycle lane should be provided, with a separated bike lane being the safest option for all road users.
3. **Lack of centrally-located BIXI station** - In order to provide a seamless connection between transit and bicycle sharing, a BIXI station should be located directly in front of Union Station. There is no better place for a large BIXI stand than right in front of Canada's largest transit hub, where it would signal our City's commitment to the bicycle as a legitimate mode of transportation. A potential solution would be relocating some of the taxi bays from directly in front of Union station to the south side of Front Street east of Bay Street and west of York Street.

It should be noted that all three of the above shortcomings were identified by Metrolinx in its comments to the City on the Project.¹ Despite the central importance of transit to this Project,² the City appears to have ignored the advice of the province's regional transit planning authority in reaching its preferred design.

Union Station, as the country's busiest transportation terminal, is a "mobility hub" under Metrolinx's mobility hub guidelines.³ Mobility hubs are to provide "**balanced access to and from transit stations,**" including:

- Creating safe and direct pedestrian and cycling routes to rapid transit stations from major destinations and regional cycling and pedestrian networks;
- Providing secure and plentiful bicycle parking at station entrances with additional cycling amenities at high volume locations; and
- Providing clearly marked and protected access for pedestrians and cyclists at station areas to minimize conflicts, particularly at passenger pick-up and drop-offs, bus facilities, and parking access points.

This Project fails to accomplish these goals insofar as they concern cycling under the Metrolinx guidelines.

Finally it is our client's position that the Project is not consistent with the Provincial Policy Statement under the *Planning Act* or the Growth Plan for the Greater Golden Horseshoe, nor is it in conformity with the City of Toronto Official Plan.

The Provincial Policy Statement (2005) calls for planning that meets the need of cyclists, and the promotion of energy-efficient, multi-modal transportation systems:

1.5.1 Healthy, active communities should be promoted by ... a. planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, and facilitate pedestrian and non-motorized movement, including but not limited to, walking and cycling;

1.6.5.1 Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.

1.7.1 Long-term economic prosperity should be supported by: ... d. providing for an efficient, cost-effective, reliable multi-modal transportation system that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs;

¹ See letter from Metrolinx to the City Clerk dated February 29, 2012 (attached), which Cycle Toronto fully supports.

² The Environmental Study report itself recognises that: "Every business day, Union Station and the Union Station Bus Terminal serve more than 165,000 GO Transit passengers. With the planned expansions to Union Station, this passenger demand is expected to significantly increase over the next 20 years." (Executive Summary, p. vii.)

³ See http://www.metrolinx.com/en/projectsandprograms/mobilityhubs/mobility_hub_guidelines.aspx.

The Growth Plan for the Greater Golden Horseshoe, 2006 also supports our client's position:

3.2.2 *Transportation - General*

1. *The transportation system within the GGH will be planned and managed to -*
 - a) *provide connectivity among transportation modes for moving people and for moving goods*
 - b) *offer a balance of transportation choices that reduces reliance upon any single mode and promotes transit, cycling and walking*
 - c) *be sustainable, by encouraging the most financially and environmentally appropriate mode for trip-making*
 - d) *offer multi-modal access to jobs, housing, schools, cultural and recreational opportunities, and goods and services*
 - e) *provide for the safety of system users.*

...
3. *In planning for the development, optimization, and/or expansion of new or existing transportation corridors, the Ministers of Infrastructure and Transportation, other Ministers of the Crown, other public agencies and municipalities will -*
 - ...
 - b) *support opportunities for multi-modal use where feasible...*
 - ...
 - d) *consider separation of modes within corridors, where appropriate*

...

3.2.3 *Moving People*

3. *Municipalities will ensure that pedestrian and bicycle networks are integrated into transportation planning to -*
 - a) *provide safe, comfortable travel for pedestrians and bicyclists within existing communities and new development*
 - b) *provide linkages between intensification areas, adjacent neighbourhoods, and transit stations, including dedicated lane space for bicyclists on the major street network where feasible.*

Cycling is an important part of the City of Toronto Official Plan. Cycling is most directly addressed in section 2.4 entitled *Bringing the City Together: A Progressive Agenda of Transportation Change*. This section also includes references to the Toronto Bike Plan. The Policies promoted under section 2.4 of the Official Plan include:

1. *Travel demand management (TDM) measures will be introduced to reduce car dependency and rush-hour congestion by: (a) increasing the proportion of trips made by transit, walking and cycling; ...*

...

7. *Policies, programs and infrastructure will be introduced to create a safe, comfortable and bicycle-friendly environment that encourages people of all ages to cycle for everyday transportation and enjoyment including:*
 - a) *an expanded bikeway network;*
 - b) *provision of bicycle parking facilities in new developments;*
 - c) *provision of adequate and secure bicycle parking at rapid transit stations;*
and
 - d) *measures to improve the safety of cyclists through the design and operation of streets and through education and promotion programs.*
- ...
14. *Existing transportation terminals will be retrofitted for inter-modal connections when redevelopment occurs*

The Project runs contrary to the City of Toronto Official Plan by failing to provide safe lanes for bicycle transportation and failing to accommodate access by bicycle to Union Station.

Given the scale and importance of the project, the City's failure to provide adequate cycling infrastructure can be expected to cause significant environmental impacts, and has already given rise serious public concern. To carry out the project as currently envisioned would be inconsistent with the purpose and intent of the Ontario *Environmental Assessment Act*.

If Cycle Toronto's concerns regarding the Project cannot be resolved with the City, we have been instructed to request that the Minister of the Environment make an order under Part II of the *Environmental Assessment Act* that would require the Project to undergo an individual environmental assessment, so that our client's concerns can be fully addressed.

Kindly acknowledge receipt of this correspondence.

Yours very truly,



A. Milliken Heisey
AMH/cmb

cc: Cycle Toronto

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Metrolinx

Encl.: Copy of letter from Metrolinx to the City Clerk dated February 29, 2012