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August 27, 2021

Katerina Downard
Environmental Policy Office
777 Bay Street
Suite 700
Toronto, ON
M7A 2J8
Canada

Re: ERO 019-3839 Greater Golden Horseshoe (GGH) Transportation Plan

Dear Ms. Downard:

The City of Hamilton (the City) appreciates the opportunity to provide feedback with respect to the Greater Golden Horseshoe (GGH) Transportation Plan and specifically the June 2021 “Towards a Greater Golden Horseshoe Transportation Plan Discussion Paper.” The City welcomes recognition of the need for an integrated transportation system in the GGH region and beyond that provides seamless, safe and accessible mobility for people and goods.

The following is a summary of the City of Hamilton’s staff comments on the Discussion Paper and proposed Vision. Due to reporting Council lead times, staff comments will be formally presented to the City’s Public Works Committee on September 20, 2021 and subsequently to Council on September 29, 2021. Any additional comments or revisions that are raised by City Council will be provided as a supplemental submission.

Proposed 30-Year Vision

The proposed Vision as articulated through nine descriptors, appropriately focuses on key factors such as safety, accessibility, and seamless mobility, all of which are very important to Hamilton. The Vision also includes reference to “supporting a more sustainable and resilient region”. However, it is staff’s opinion, that climate change and its impacts should be more explicit in the 2051 Vision. Notwithstanding this, several of the near-term actions are related to climate change, as is the pillar related to a Connected Transit System. Similarly, several other themes such as public health, an aging population, and the need for sustainable funding are not prominent in the Vision. It may be useful to provide an explanation of the links between the Vision elements and higher-level issues such as climate change and public health.

The City of Hamilton is very much supportive of the direction to include a mix of solutions including new infrastructure, better services, and new policies. This is preferred over more traditional plans which are focused primarily on capacity-based solutions.

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Connected Transit Systems

The City supports the identified policies and mix of new infrastructure and enhanced transit services. Moving people locally and regionally on a connected and frequent transit system supports the City of Hamilton in achieving its targeted 12% transit mode share as identified in the City's TMP. The City offers the following comments:

- (a) The plan explicitly references the Hamilton Light Rail Transit (LRT) consistent with the recent commitments by the Province and Federal governments as well as the A-line Bus Rapid Transit (BRT) in the mapping, however, there is no mention of the Metrolinx's proposed Frequent Rapid Transit Network (FRTN). The FRTN, which includes Hamilton's BLAST corridors, is a critical part of the City and Regional Transportation Plan. Additionally, there is no mention of the Dundas BRT which would traverse Highway 5 and connect Waterdown.
- (b) A better and connected regional transit system reduces congestion and emissions, increases productivity, and provides faster commute times. It is also critical that these transit connections connect key urban communities and employment centres. The proposed conceptual east-west cross-regional connection (Burlington to Oshawa), which is shown to terminate in Burlington, will not achieve this connectivity unless it is accessible for Hamilton residents and employees. As such, the City looks forward to exploring options for this connector and its potential extension, or alternatively fast frequent feeder connections.
- (c) Increasing the frequency of local transit to every ten minutes across all urban areas is an aspirational target and critical to support more compact mixed-use development. However, such service increases would have significant operational costs and, also require investments in infrastructure to efficiently achieve these service levels. It is recommended that the Final GGH Plan provide greater context to this recommendation and, also outline the financial implications and funding options.
- (d) Similarly, the concept of ensuring 24-hour transit service to the Region's largest employers is also significant for Hamilton's growing Airport Employment Growth District (AEGD) and other hubs; however, it is unclear what role the Province would play in achieving these enhanced service standards.
- (e) One potential gap that the City identified is a higher-order connection between Hamilton, Brant County, and Kitchener/Waterloo Regions. By 2051, the combined population of the three centres will be close to two million people. Currently, there is no viable transit connection between these centres and Hamilton. Given the projected population and employment increase for these three areas, a robust transit solution and managed lanes potentially utilizing managed lanes on Highway 403 and Highway 6 will be required.
- (f) The plan identifies the significance of promoting active/alternative transportation modes as the first choice for short trips and to access transit stations. The City supports this element and looks forward to continuing to work with the Province to improve multimodal connectivity and deliver active transportation infrastructure improvements.

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Road Elements

The City supports the second pillar of the proposed 2051 vision and the provision of a resilient road network that provides more capacity in the most congested areas, more efficient freight routes and better route alternatives. The City also supports policies related to Travel Demand Management, managed lanes, and leveraging intelligent technologies to address congestion.

We provide the following comments for consideration:

- (a) Hamilton Council has consistently advocated for highway widening projects for Highway 403, Highway 6 South, and the QEW as identified in the discussion paper and background documents. As such, the City is pleased that these are identified explicitly in the GGH Plan.
- (b) The discussion paper recommends widening of Highway 403 between the limits of Paris Road to the Aberdeen and Lincoln Alexander Parkway (LINC) and then from Aberdeen Avenue to Highway 407. As such, there is a gap between Aberdeen and the LINC that is not identified for widening. It is unclear if it is based on the forecasting and needs assessment or due to physical constraints with respect to escarpment. In the 2013 Niagara to GTA Corridor Planning and EA Study Phase 1 Transportation Development Strategy, the proposed widening limits were from King Street/Main Street to Jerseyville Road. The City would like to better understand the background behind this network decision.
- (c) Hamilton Council is on record of requesting the MTO initiate the EA for the Widening of Highway 403, which is the most appropriate way to evaluate widening alternatives and transition points. As part of this work, staff intend to raise the idea of reconfiguring the ramps at King Street and Main Street to allow for two-way operations.
- (d) It is our understanding that interchange improvements are not listed in this discussion paper, however, they are incorporated in the modelling work and will be programed as part of the capital improvement projects by the year 2051. Hamilton Council is on record of advocating for the acceleration of the Highway 5 and 6 interchange in Waterdown given the existing need and rapid growth in this area.
- (e) The City of Hamilton supports the Province's concept for managed lanes as part of any highway expansion which prioritizes higher occupancy modes and other approaches to encourage more sustainable transportation. Map 2 in the Discussion Paper shows managed lanes on both Highway 403 and the QEW, which is appropriate. However, in a recent meeting on the Highway 403/Highway 6 Interchange Study, representatives from MTO indicated that a decision had been made to not extend HOV lanes past the Freeman Interchange. Staff are seeking clarification on the GGH plan in this regard and would advocate that the HOV lanes or other forms of managed lanes are key to achieving more sustainable transportation and consistent with the 2051 Vision.

Freight and Goods Movement

The City is supportive of the high-level criteria identified for the development of an integrated, multimodal Strategic Goods Movement Network (SGMN) to efficiently move goods across the

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Region. The City is also supportive of real-time system management and deployment of new technologies such as truck platooning. We offer the following suggestions:

- (a) Hamilton is well positioned as a goods movement hub given existing air, rail, marine, and highway infrastructure. All efforts should be made to maximize intermodal connectivity, to, from, and between these assets.
- (b) Off-Peak Delivery (OPD) has the potential to distribute the peak hour traffic, relieve congestion, reduce emission and improve air quality. Conversely, OPD negatively impacts the quality of life for residential communities where land uses are not freight-supportive. Accordingly, Hamilton may adopt a hybrid approach for OPD. Specifically, as part of the City's Truck Route Master Plan Update, the concept of day-time only routes in the downtown is being considered. Ultimately, the decision on OPD may be location specific.
- (c) Working with partners and establishing a framework for truck-pooling to reduce the volume of empty mile trucks on the road system would help achieve the vision of efficient goods movement.
- (d) Given the importance of data collaboration in goods movement planning, the City strongly suggests the development of a freight data collection and collaboration strategy between all levels of governments and key private sector partners. To improve road user safety, the use of electronic logging devices should be a requirement for any mid-size and large-size trucks.
- (e) The development of a regional truck navigation system, inclusive of local and regional strategic goods movement networks, that provides truck drivers direction on-route to legally travel on and places to safely rest could be identified as an early action.
- (f) The City's truck route system is currently under review and will be modified as such to balance the needs of the community and the goods movement industry while providing truck accessibility to key employment destinations. The City observed one discrepancy in the SGMN maps showing the Westbrook Road as a key goods movement corridor. We recommend, in the final plan, the SGMN maps be updated to reflect the council-approved updated truck route network and, in the interim, replace the Westbrook Road with Regional Road 56.
- (g) The Hamilton Transportation Master Plan (TMP) recognizes the need for a strategic goods movement link connecting Hamilton AEGD (Provincially Significant Employment Lands) to Red Hill Valley Parkway. It provides direct connectivity between major transportation terminals (Port and Airport) and significant employment lands.
- (h) There is no mention of policies and plans concerning the use of alternative fuel for goods movement vehicles and infrastructure to support the transition from diesel to carbon-neutral fuel sources.

NEAR TERM ACTIONS

The City is supportive of the breadth of the near-term actions as they represent the balance of infrastructure, policies and services. The near-term actions highlighted in the discussion paper

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are in line with the actions identified in the Hamilton TMP, thus represents opportunities for partnership with the Province for greater leverage.

Key near-term actions of significance for Hamilton are advancing the Hamilton LRT, completion of the Highway 5/6 interchange, and extending two-way, all-day GO rail service.

Notably, Hamilton is a leader in the testing of new technology around connected and autonomous vehicles through the Autonomous Vehicle Innovation Network (AVIN). Hamilton is one of six Regional Technology Development Sites (RTDS). In partnership with the RTDS, Hamilton is exploring the deployment of emerging technologies to improve safety and efficiency in multimodal transportation systems. Moreover, Hamilton's soon to be implemented pilot project for on-demand transit will serve as a test model for other communities.

NEXT STEPS AND IMPLEMENTATION CONSIDERATIONS

In response to the question posed by the Province: "What implementation considerations do you see as most critical as we develop the GGH Transportation Plan to support effective implementation at a regional level, for the province and for its partners?", we would like to highlight three critical areas with respect to implementation:

1. Coordination of Land Use and Transportation Planning

The success of the GGH Transportation Plan is contingent on strong land use policies that direct and facilitate compact mixed-use developments focused on transit corridors. Similarly, major transit investments such as Hamilton's LRT project and the GO Rail enhancements are drivers of more efficient land use patterns. The GGH Plan presents an opportunity to align land use and transportation plans starting with the Provincial Growth Plan through to municipal Official Plans and Secondary Plans.

2. Embracing Innovation

Events that have taken place over the past year and a half as a result of COVID-19 have demonstrated the potential for innovation to have a profound effect on transportation. One example is the move to working from home that was facilitated through rapid deployment of technology in combination with policy changes. It is expected that this type of innovation, along with vehicle technologies, data gathering, and shared mobility will continue to change at a rapid pace and require partnerships between governments, the private-sector and individuals. It will be important, however, to closely monitor this innovation to ensure that interests of individual citizens are protected, and that changes do not result in greater inequalities because of income, ethnic background or physical abilities.

3. Sustainable and Predictable Funding

The past several years has seen major investments in transportation by senior levels of government, and in some cases, investments in areas not traditionally funded, such as active transportation. Notwithstanding these unprecedented investments, there remains many challenges for municipalities in terms of funding for operations, maintenance, and asset preservation. To be successful, the GGH Transportation Plan needs to be grounded by a long-term financial strategy that provides predictability to investments and operations at all

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levels of government. This is particularly important as many of the actions identified in the plan, such as provision of 24-hour transit service to major employment hubs, may require different funding models than are currently in place.

Sincerely,

A handwritten signature in cursive script that reads "Brian Hollingworth".

Brian Hollingworth, P.Eng.
Director, Transportation Planning and Parking
City of Hamilton (COH)

cc: Mike Field, Acting Director, Transportation Operations and Maintenance, COH
Edward Soldo, Chief Road Official, COH
Tony Sergi, Senior Director, Growth Management, COH
Gord McGuire, Director, Engineering Services, COH
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