

## Parks and Environment Committee - My comments for 2014.PE29.8 on August 15, 2014 Parks and Environment Committee

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**From:** Walk Toronto <pedtoronto@gmail.com>  
**To:** <pec@toronto.ca>  
**Date:** 08/14/2014 10:29 AM  
**Subject:** My comments for 2014.PE29.8 on August 15, 2014 Parks and Environment Committee  
**Attachments:** WalkTorontoLowerDonAccessibility.pdf

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*To the City Clerk:*

*Please add my comments to the agenda for the August 15, 2014 Parks and Environment Committee meeting on item 2014.PE29.8, Lower Don Trail Accessibility*

*I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.*

Comments:  
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Dear Councillor Mammoliti and members of the Parks and Environment Committee,

Please find attached Walk Toronto's comments on "Lower Don Trail Accessibility", which you will be considering at your Aug. 15 meeting.

I look forward to deputing tomorrow.

Yours truly,

Michael Black

Steering Committee

**Walk Toronto**

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# WALK TORONTO COMMENTS ON “LOWER DON TRAIL ACCESSIBILITY” (2014.PE29.8)

Considered by: Parks and Environment Committee (City of Toronto) at August 15, 2014 meeting  
Submitted by: Walk Toronto  
Date: August 14, 2014

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## SUMMARY

Walk Toronto urges the City of Toronto to create *fully accessible* connections to the Lower Don Trail, between Pottery Road and Corktown Common. Improving access to green space and parkland is especially important for Torontonians who live downtown and to the east of the Lower Don in Riverdale and on the Danforth – areas that suffer from poor parkland provision compared to the rest of the city. **Building accessible connections to existing major green space has several advantages over creating new parkland:**

- It can be achieved at a potentially lower cost.
- It can be achieved within a timeframe and at a location mostly of the City’s choosing (as opposed to opportunities for new parkland acquisition, which are quite limited within central Toronto).
- It contributes to bringing the City’s inventory of parks into compliance with the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*.
- It takes advantage of the accessibility upgrades that the TTC is undertaking for its streetcar fleet over the next few years.

Walk Toronto therefore supports Councillor Paula Fletcher’s request for further study on potential points of access onto the Lower Don Trail. We also request that the study include input and representation from a broad range of relevant stakeholders, advocates and groups, including people with disabilities, seniors, parents/caregivers, pedestrians, cyclists, park and trail users and groups, local residents and businesses, BIAs, Bridgepoint Active Healthcare, Riverdale Farm, Evergreen Brick Works, Pan Am Path, etc.

We appreciate the potential challenges of designing, constructing and maintaining an accessible ramp, and therefore believe **a detailed feasibility study should be initiated as soon as possible**. We want to ensure that any progress on the plans to install new staircases at the bridges on Gerrard Street East and Dundas Street East does not preclude the possibility of creating a more accessible connection in the area. Other accessible connection options, such as a street-level railway crossing, could be studied at the same time.<sup>1</sup>

## BACKGROUND

The Lower Don Trail stretches from Taylor Creek to Lake Shore Boulevard, following the course of the Don River. This multi-use trail, designed for pedestrians and cyclists, is an incredible resource. It offers Torontonians access to green space, provides recreation opportunities, and enhances the city's liveability.

The City of Toronto is currently implementing a number of works to improve the conditions of the existing stretch of trail between Pottery Road in the north and Corktown Commons in the south, as well as to improve access into the surrounding trail network. The improvements are based on the *Lower Don Trail Master Plan*,<sup>2</sup> which was completed by City of Toronto and the Toronto and Region Conservation Authority (TRCA) in September 2013. The master plan notes:

Poor connectivity is the greatest challenge facing the trail, and presents a host of problems for safety, accessibility and simple functionality of the trail as a site of public recreation. . . . This closes it off to many potential users.<sup>3</sup>

The addition of staircases at the bridges on Gerrard Street East and Dundas Street East is among the access improvements proposed by the master plan. Although the new stairs are desirable, they do not address the accessibility barrier for people who use wheelchairs or other mobility devices, parents/caregivers with children in strollers, seniors, and anyone who finds it difficult to use stairs. Right now, if one cannot physically cope with stairs, the only points of access are at Pottery Road and at Corktown Common (south of Eastern Avenue). This situation obviously will not improve with the addition of new staircases. Active transportation advocates have been pressing the City of Toronto to address this concern, by asking for an accessible ramp connection to be constructed, rather than only staircases.

The need is made all the more acute because approximately **4.5 km separate the two accessible trail entry points**.

- This distance can be intimidating for people with disabilities, seniors with limited stamina, and young children.
- The most inaccessible part is in the middle, to the west of which lie some of the densest and fastest-growing parts of Toronto.

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<sup>1</sup> This document also responds to some of the information gained during the Lower Don Trail site walk on June 6, 2014, and to the Memorandum from DTAH/AECOM dated June 4, 2014, which provides an analysis of a report produced by Walk Toronto and Cycle Toronto, "Creating Accessible Connections: Ramps to the Lower Don Trail at Dundas and Gerrard," April 22, 2014, <http://tinyurl.com/accessibleLowerDonRamps-Ap2014>.

<sup>2</sup> The master plan's full title is the *Lower Don Trail Access, Environment + Art Master Plan*. It is available from this City of Toronto link but without the appendices:

[http://www1.toronto.ca/City%20of%20Toronto/Parks%20Forestry%20&%20Recreation/Trails/Files/pdf/D/Lower\\_don\\_trail\\_master\\_plan.pdf](http://www1.toronto.ca/City%20of%20Toronto/Parks%20Forestry%20&%20Recreation/Trails/Files/pdf/D/Lower_don_trail_master_plan.pdf). A version including appendices is available here: <http://tinyurl.com/LDTMasterPlan>.

<sup>3</sup> *Lower Don Trail Master Plan*, 10, 13.

- The middle is also the section which is crossed by public transit lines, unlike the trail's extremities.

## ACCESSIBILITY

Accessibility is one of the stated principles underpinning the master plan: "Provide clear and safe access to the trail for different levels of mobility and ability" (page 7). Public input during the master plan's development also identified accessibility as a concern: participants suggested that access points be designed to accommodate wheelchairs, seniors, strollers, scooters, cyclists, etc.<sup>4</sup>

As noted in Councillor Fletcher's letter, the location of the new staircases at two bridges coincides with streetcar routes, where the City's new fully accessible streetcars will eventually run. The bridges, which span the Don River, are located at Gerrard Street East and Dundas Street East. Furthermore, streetcar service is available east of a third staircase, at the Riverdale Park pedestrian/cyclist bridge.

Therefore, we will have fully accessible public transit to trail access points that will *not* be fully accessible. Ironically, there is no public transit to the fully accessible trail access locations that currently exist, or that may be constructed in the future – that is, at Pottery Road, Bala Underpass at Corktown Common, Lower Don Trail to Beltline Trail Bridge (A2 & A3.2 in the master plan) and Lower Don Trail - New Green Space Bridge (A3.3 in the master plan).

The Design of Public Spaces Standards (Accessibility Standards for the Built Environment)<sup>5</sup> of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005* begin to come into effect in 2015; the City of Toronto and the TRCA also each have accessibility policies, standards or guidelines. The Lower Don Trail is also a key component of the Pan Am Path, a legacy project of the TORONTO 2015 Pan Am/ Parapan Am Games.

Emily's House (Toronto's first pediatric palliative care hospice) and Bridgepoint Active Healthcare are situated just east of the Don River, near the existing Riverdale Park pedestrian/cyclist bridge and close to where the staircase will be built on Gerrard Street East. A ramp access makes sense to better serve the communities using these facilities. Bridgepoint – as one of the Toronto's major rehab centres – cares for many patients dependent on mobility devices. Such patients' recovery would be aided by greater access to green space. Few can use the playing fields of Riverdale Park. On the other hand, the Lower Don would be a wonderful environment for them to explore – providing they had an accessible connection to it.

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<sup>4</sup> See Lura Consulting and DTAH, for the City of Toronto, *Public Meeting Summary Report* (May 2013).

<sup>5</sup> Available at [http://www.e-laws.gov.on.ca/html/regs/english/elaws\\_regs\\_110191\\_e.htm#BK92](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm#BK92).



*Left: Rendering of view from Bridgepoint Active Healthcare’s new facility, facing the Don Valley  
 Right: View of stairs leading north to Riverdale Park pedestrian/cyclist bridge. If there was a ramp at this location, Bridgepoint patients could wheel onto the trail, instead of looking at it out of a window*

Meanwhile, on the west side of the Don River is Riverdale Farm – a popular destination for school-aged children and their parents/caregivers. A ramp would enable those using strollers, mobility devices, tricycles or bike trailers to get to and from the trail.

**A disadvantage of installing a ramp at the Riverdale Park pedestrian/cyclist bridge is the steep grade of the hills on both the east and west sides of the bridge. In contrast, a ramp built at either the Gerrard or Dundas Street bridge would end at a relatively level street grade.**

## **PARKLAND DEFICITS, AND IMPROVING ACCESS TO EXISTING GREEN SPACE, TRAILS & PARKS**

Green space, trails and parks are vital to cities and the quality of life of their residents. Toronto’s *Parks Plan 2013–2017* highlights some of the many benefits parkland offers, including:

- providing affordable and enjoyable places to be physically active
- connecting families and diverse communities
- helping to improve people’s mental health and well-being

Increasing Torontonians’ access to parkland is important, given demographic trends: Toronto’s population is increasing by approximately 38,000 annually; the population is aging; people are less physically active, and one-quarter of adults are overweight or obese; there is a shift from organized sports to less structured activities, along with a growing interest in using trails for recreation, exercise and active transportation.<sup>6</sup>

<sup>6</sup> Toronto Parks, Forestry and Recreation (PFR), *Parks Plan 2013–2017* ([Toronto: City of Toronto, 2013]), 5–6, 18, <http://www.toronto.ca/legdocs/mmis/2013/pe/bgrd/backgroundfile-57282.pdf>.

In keeping with Toronto's *Official Plan (OP)*,<sup>7</sup> most population growth is expected to be focused in the Downtown and Central Waterfront areas, as well as in the four City Centres and along the "Avenues." The implications for areas surrounding the trail are clear: "Intensification of Lower Don Valley neighbourhoods will bring [an] estimated 80,000 new residents within the next twenty years."<sup>8</sup>

While population growth rates of the inner core are higher than most of the suburbs, this ratio is reversed in regards to the availability of parkland – which is low in the Downtown and Central Waterfront, but much more plentiful in the far-flung sections of the city. Furthermore,

Limited land availability and high land prices make it challenging to increase public parkland for a rapidly growing population.

Residential development is strong throughout Toronto, which means that more people will use Toronto's entire network of existing parkland. Addressing the challenge of increasing density requires strong and creative parks planning. It also signals a need for an overall rethink of the planning, design and management of green space in high-density areas by the City of Toronto, its development partners and residents in order to ensure that residents in high density areas across the city will continue to have access to parkland that meets their needs.<sup>9</sup>

Toronto's Parks, Forestry and Recreation Department maintains a five-tier park classification system.<sup>10</sup> Its smallest properties, parkettes, and the slightly larger neighbourhood parks tend to be well distributed throughout the city. These are adequate for local residents who wish to walk their dog or take their children to a playground for a few minutes. However, it is vital to for people to occasionally get away from the noise, bustle and pressures of life in the big city. More affluent Torontonians often retreat to their cottages, relax on their pleasure boats or at their golf clubs. Regrettably, these activities may be beyond the means of some residents – especially those who rely on the TTC and do not own motor vehicles (or yachts!). For them, the City provides an inexpensive alternative: City Parks, which are at the top of the park classification system. These large parks (generally exceeding 15 hectares in size) enable families to go on extended excursions into green space, at minimal expense. In many City Parks, one can walk a substantial distance, have a picnic and enjoy amenities usually not available at smaller parks.

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<sup>7</sup> City of Toronto's *Official Plan* (December 2010 consolidation):

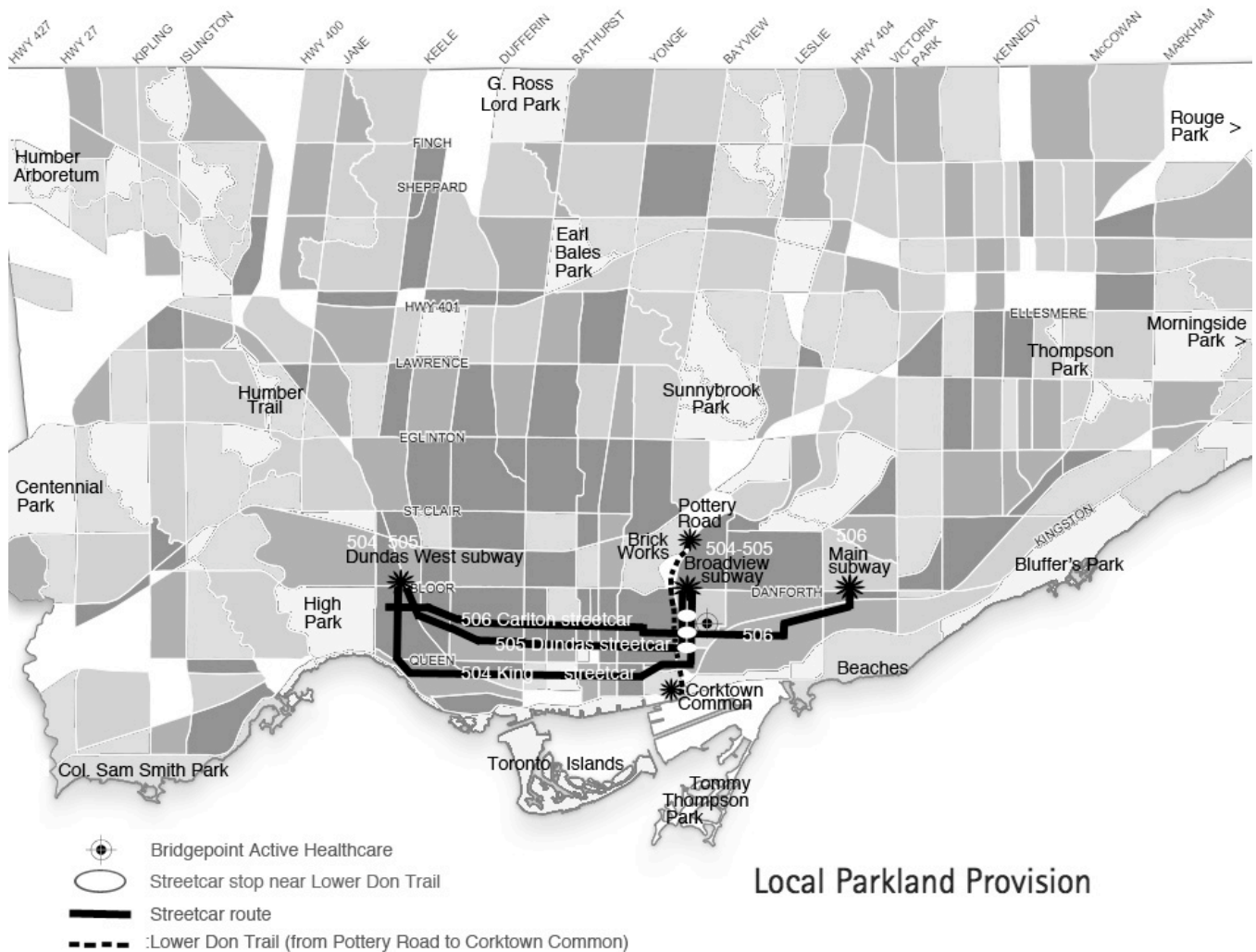
[http://www1.toronto.ca/static\\_files/CityPlanning/PDF/chapters1\\_5\\_dec2010.pdf](http://www1.toronto.ca/static_files/CityPlanning/PDF/chapters1_5_dec2010.pdf).

<sup>8</sup> PFR, "Lower Don Trail – Access, Environment + Art Master Plan," Presentation to Parks & Environment Committee, May 20, 2014, 2,

<http://www.toronto.ca/legdocs/mmis/2014/pe/bgrd/backgroundfile-69492.pdf>.

<sup>9</sup> PFR, *Parks Plan 2013–2017*, 19–20.

<sup>10</sup> *Ibid.*, 77–81.



The above map<sup>11</sup> identifies areas where there are low levels of parkland per capita with dark shading. Light tones indicate a high ratio of local parkland per capita – and it will come as no surprise that this is where one will find most City Parks.

Unfortunately, in downtown Toronto there is no City Park that one can easily walk to. The Toronto Islands require one to queue for a ferry, and the ticket price acts as a price of admission, which can be substantial for a low-income family. Using transit, downtown residents can access High Park and the Beaches – but these are situated outside the inner core. Other cities are renowned for their centrally located City Parks: Montreal has

<sup>11</sup> Map 8(B) of the *Official Plan*, [http://www1.toronto.ca/static\\_files/CityPlanning/PDF/8\\_parkland\\_b\\_c\\_oct2009.pdf](http://www1.toronto.ca/static_files/CityPlanning/PDF/8_parkland_b_c_oct2009.pdf), converted from the original colour to black and white, with certain park names and streetcar routes added.

Mount Royal. Vancouver boasts of Stanley Park. London, UK, counts two: Hyde Park and Regent's Park. And then, of course, there is New York's Central Park.

Toronto, it must be said, is known for its unique ravine and river valley systems. Therefore, it should come as no surprise that our only City Park located (or abutting) the downtown is the Lower Don. We must admit that it is no Central Park – indeed, the location isn't even very central. But the one great saving grace of the Lower Don Trail is that it passes underneath no less than four streetcar routes.

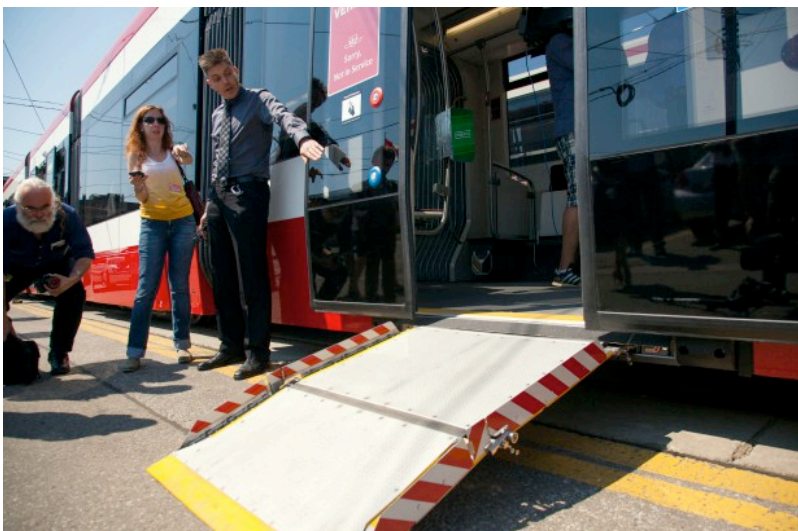
## STREETCARS

Let us re-examine the park provision map. Note that the downtown, the west end and much of the Danforth are covered on the map by a dark (that is, park-poor) swathe. It just so happens that the streetcar routes all pass through most of this swathe at various points. It is clear that streetcars have the potential to provide downtowners who do not live within walking distance with a marvelous means of travelling to the Lower Don.

The streetcar routes vary in their usefulness. The Gerrard St. Bridge is best served by the TTC.

- Routes **501 (QUEEN)** and **502 (DOWNTOWNER)** pass over the Lower Don at too southerly a point to justify building a ramp at the bridge, as an accessible trail entrance at Corktown Common is not far to the south of the streetcar route
- Route **504 (KING)** uses the same bridge to cross the Don as the 501-502, but crucially, the route turns north up Broadview Ave., with stops about 300 m east of all three bridges: Riverdale, Gerard and Dundas
- Route **505 (DUNDAS)** also turns north at Broadview, using the same stops near all three bridges
- Route **506 (CARLTON)** runs along College, Carlton and then to Gerrard, where it stops only 150 m to the east of the trail

The next few years is an opportune time to be considering streetcars as an accessible means of travel to the Lower Don Trail. While the TTC has already completed converting its bus fleet to handicapped accessible models, it has only just started the process with streetcars. They feature wide wheelchair ramps.



*Demonstration of new, low-floor streetcar with wheelchair ramp extended*



The first new, accessible streetcars will be entering service on Spadina at the end of this month, with further vehicle rollouts scheduled for the 505 Dundas route in 2015/ 2016, the 504 King in 2017, and the 506 Carlton in 2018/ 2019.<sup>12</sup> It makes sense to for the City to be upgrading accessible connections to the Lower Don in tandem with the the TTC's upgrade to its streetcar fleet.

## PARKLAND DEDICATION FUNDING

Toronto's main tool to acquire new parkland is the parkland dedication process, as set out in its *Official Plan*. Land developers are required to dedicate a portion of their sites to the City for public parkland or, where this is not feasible, to provide a cash-in-lieu of parkland payment. The Local Parkland Provision map (above) identifies areas where there are low levels of local parkland per capita. In these areas of low parkland provision, which City Council has identified as priority areas for parkland acquisition and where an Alternative Parkland Dedication By-law has been enacted, alternative (higher) parkland dedication rates are required.<sup>13</sup>

## COST CONSIDERATIONS

With regard to cost, the City had estimated the two staircases at \$225,000 each in construction costs.<sup>14</sup> While a ramp may be more expensive, one must consider the future costs of retrofitting infrastructure to meet accessibility standards. Tackling accessibility issues should be integral to any improvements now being made to the trail.

Toronto could draw upon its parkland alternative rate reserves to construct a ramp. In the Downtown Planning District, the greater portion of these reserve funds have been contributed by condo developers. It is difficult to think of a park improvement project that would benefit downtown condo residents more substantially than the building of an accessible ramp to the Narrows of the Lower Don. After all, increasing access to green space is the whole point of parkland reserve funds.

How much, one must ask, is available? The City of Toronto's recent study *Downtown Toronto: Trends, Issues, Intensification* notes that **from Toronto's three downtown wards, the City has \$37 million in alternative rate reserves that can be used to acquire parkland or improve existing parks:**

As of April 2014, there is \$29 million in the Toronto and East York District (TEY) parkland acquisition reserves (which includes the Downtown study area). In addition, there is \$37 million in reserves from the alternative rate cash-in-lieu payments from the three wards that make up the downtown, which can be allocated for parkland acquisition or improvement of existing parks. If the alternative rate reserves from the Downtown Study area were directed solely to land acquisition, with current land

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<sup>12</sup> TTC, "Did you know?,"

[http://www.ttc.ca/About\\_the\\_TTC/Projects/New\\_Vehicles/New\\_Streetcars/Did\\_you\\_know.jsp](http://www.ttc.ca/About_the_TTC/Projects/New_Vehicles/New_Streetcars/Did_you_know.jsp).

<sup>13</sup> PFR, *Parks Plan 2013–2017*, 54; the OP identifies the areas of low parkland provision as the lowest two quintiles shown on Map 8(B), which can be found here:

[http://www1.toronto.ca/static\\_files/CityPlanning/PDF/8\\_parkland\\_b\\_c\\_oct2009.pdf](http://www1.toronto.ca/static_files/CityPlanning/PDF/8_parkland_b_c_oct2009.pdf).

<sup>14</sup> This estimate is taken from page 3 of Addendum 2 to the City of Toronto's RFP #9118-13-7277, for Lower Don Valley Access Improvements. This RFP selected a consulting team for the design and construction administration of improvements to the Lower Don Trail, Bayview Avenue multi-use trail, Pottery Road and bridge crossing the Don River at Pottery Road.

values estimated to be up to \$30-60 million an acre throughout the Downtown, the \$37 million may only purchase one acre of land in a lower demand area of the Downtown, at best.<sup>15</sup>

The above quotation also gives another perspective on the relative cost of a ramp. If one contrasts the potential cost of purchasing land to create new green space (“estimated to be up to \$30-60 million an acre throughout the Downtown”) against the cost of providing a ramp so that downtown and other Torontonians can access the green spaces connected to the Lower Don Trail, building a ramp is a bargain.<sup>16</sup>

Evidence of how Toronto’s high downtown land values hamper the City’s ability to create new green spaces can be seen in this example: Lanterra Developments indicated that it paid \$65 million for the 2¼ acres of barren land at 11 Wellesley Street West, a site where the local councillor and residents have long wanted to build a park.<sup>17</sup> “This is the very last opportunity to build a park of this significant size in a very dense urban environment,” said Wong-Tam (Ward 27, Toronto Centre-Rosedale). ‘If we lose this once-in-a-lifetime opportunity then I would say it’s gone forever.’<sup>18</sup> It is difficult for the City to compete against private land developers who have that level of financing available. An irony of densification is that intense condo development drives up the price of land that the City may potentially wish to acquire for new parks – parks made necessary by additional local residents who have moved into new condos.



Left: 11 Wellesley St. W. land parcel that the City of Toronto could not afford to buy for \$65,000,000

Right: View of river crossing on Lower Don Trail. The City can provide access to this unique scenery for just a fraction of the cost of the Wellesley property

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<sup>15</sup> Thomas Ostler with GD Economics, *Downtown Toronto: Trends, Issues, Intensification* (Toronto: City of Toronto, City Planning - Toronto and East York District, May 2014), 78, <http://www.toronto.ca/legdocs/mmis/2014/te/bgrd/backgroundfile-69192.pdf>

<sup>16</sup> A section of the eastern boundary of Toronto’s downtown – as “Downtown” is defined in the *Official Plan* – follows the lower Don River.

<sup>17</sup> Tara Perkins, “Condo plan for a major downtown Toronto site may include a park,” *Globe and Mail*, March 21, 2013, <http://www.theglobeandmail.com/news/toronto/condo-plan-for-major-downtown-toronto-site-may-include-a-park/article10052382/>.

<sup>18</sup> David Rider, “City of Toronto may bid on Wellesley St. W. lot in hopes of creating Jane Jacobs Park”, *Toronto Star*, October 18, 2012, [http://www.thestar.com/news/city\\_hall/2012/10/18/city\\_of\\_toronto\\_may\\_bid\\_on\\_wellesley\\_st\\_w\\_lot\\_in\\_hopes\\_of\\_creating\\_jane\\_jacobs\\_park.html](http://www.thestar.com/news/city_hall/2012/10/18/city_of_toronto_may_bid_on_wellesley_st_w_lot_in_hopes_of_creating_jane_jacobs_park.html).

Meanwhile, Toronto seems prepared to investigate much costlier infrastructure work to benefit car drivers in the Lower Don Valley. In July 2014, it was reported that the City and the TRCA are studying several possible solutions to combat flooding problems affecting the Don Valley Parkway, including raising the road level.<sup>19</sup> The City should be equally willing to study a ramp to benefit pedestrians and other trail users. Moreover, a ramp would also offer an additional accessible emergency exit to trail users, in the event of flooding.

## TECHNICAL CONSIDERATIONS

### DTAH/AECOM Memorandum

Members of Walk Toronto joined other pedestrian and cycling advocates, Councillor Fletcher, City of Toronto staff and consultants and for a site walk on June 6, 2014, where we learned more about technical, land ownership and regulatory issues related to constructing a ramp access as part of the Lower Don Trail Improvements project. We were also then provided with a Memorandum dated June 4, 2014, addressed to Parks, Forestry and Recreation, from consulting team DTAH/AECOM. This memo analyzed an April 22, 2014, report produced by Walk Toronto and Cycle Toronto groups, “Creating Accessible Connections: Ramps to the Lower Don Trail at Dundas and Gerrard.”<sup>20</sup> We will briefly respond to some of the more important issues raised in the DTAH/ AECOM memo.

### Master plan access points

Walk Toronto is enormously appreciative of plans to construct new bridges along the Lower Don. Unfortunately, none of the proposals provide accessible connections in the crucial Narrows section adjacent to downtown neighbourhoods (to the west) and to Riverdale (to the east).

- The Pottery Road Foot/Cycle Bridge and the bridge to the Beltline will be of great value in accessing the Brick Works and the Beltline trails. They are far less useful in providing anyone who lives south of Bloor/Danforth with a convenient, accessible connection to the Lower Don Trail.
- Likewise, the two bridges that will link the Lower Don Trail with Rosedale Valley Road and new green space are located far from residential neighbourhoods and public transit.
- Upgrades for existing infrastructure are proposed at the Belleville Underpass and the Narrows Bridge. It is important distinguish between two aspects of accessibility:
  - improving conditions for those who **are already on the trail** – which the realignments will admittedly achieve
  - providing additional or improved **entry points** to the trail, that are accessible. This is Walk Toronto’s overriding goal, and the realignments do not bring us any closer to reaching it.
- The new staircases at Gerrard St. and Dundas St. will incorporate designs that marginally improve accessibility.
  - Bike troughs will mitigate the exertion required to take a bicycle up the stairs. This will be a boon for seniors and anyone else possessing limited body strength.
  - The same demographic will benefit from shallower step risers.

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<sup>19</sup> Tara Deschamps, “Less flood-prone DVP is doable, but costly,” *Toronto Star*, July 4, 2014, [http://www.thestar.com/news/city\\_hall/2014/07/04/less\\_floodprone\\_dvp\\_is\\_doable\\_but\\_costly.html](http://www.thestar.com/news/city_hall/2014/07/04/less_floodprone_dvp_is_doable_but_costly.html).

<sup>20</sup> The “Creating Accessible Connections” report is available here: <http://tinyurl.com/accessibleLowerDonRamps-Ap2014>. Note that it deals at length with space constraint issues.

- Nonetheless, users of wheelchairs, stroller and bundle-buggies – not to mention cyclists riding recumbents, trikes, and trailers – find that staircases constitute barriers whether or not they have troughs and shallow steps. In a nutshell, any device that has three or four wheels generally should be used on a ramp.

### Ramp length

The DTAH/AECOM memo cites various accessible ramp design standards, originating both from within the province and from other jurisdictions. We have questions about some of the references, especially if they would lead one to deem a ramp to be technically too difficult or impossible to implement. For example, with regard to ramp length, the memo gives standards or guidelines for maximum ramp slope from *AODA, 2005*; the National Building Code; and Cycling England.

From the *AODA, 2005*, the memo cites a maximum slope of 1 in 15 (6.67%) – this is not the maximum slope requirement for a recreational trail but for an “exterior path of travel.” Exterior paths of travel are described in *AODA, 2005* as “newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience” (s. 80.21). As the Lower Don (Recreational) Trail is not maintained through the winter, the City appears to classify the trail as a “recreational trail,” which, in contrast, the *AODA, 2005* defines as “public pedestrian trails that are intended for recreational and leisure purposes” (s. 80.1). And according to s. 80.13, where a recreational trail (or beach access route) is equipped with a ramp, the maximum running slope of the ramp must be no more than 1 in 10 (10%).

A National Building Code of Canada slope recommendation of 1 in 20 (5%) is mentioned, and it is pointed out that the code notes that even a slope of 1 in 16 can be difficult or dangerous for some people with reduced mobility, especially in the winter. A discussion with a civil servant at the Ontario Ministry of Municipal Affairs and Housing suggests that a building code would not be relevant to a ramp to a recreational trail; nevertheless, if a building code had any application, one would look to the Ontario Building Code. **As pedestrian and mobility advocates, we support the emphasis on safety and comfort for people with mobility issues, but applying restrictive ramp slopes, such that the result is no access at all, would defeat the purpose of laws and standards aimed at improving accessibility for all.**

Cycle route gradients from Cycling England are referenced: “a maximum gradient of 3% with the absolute maximum 5% for lengths up to 100m. On the approach to priority junctions this should not exceed 3%.” Looking at Cycling England’s *Design Portfolio*, “C.09 Gradients,”<sup>21</sup> we would point out that the design guidance goes on to say,

Where steeper slopes are unavoidable the limiting gradient is 7% for lengths up to 30m. Gradients above this figure are not recommended, especially where cyclists will be sharing space with pedestrians, except for very short lengths. However, the absence of gentle gradients in a hilly area should not be used as a reason for not catering for cyclists. Walking the cycle for some stretches may be preferable to having no convenient route in the first place. (page 1)

In addition, other gradients are actually specified for approach ramps:

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<sup>21</sup> Published in August 2008. Available here:

[http://webarchive.nationalarchives.gov.uk/20110407094607/http://dft.gov.uk/cyclingengland/site/wp-content/uploads/2011/01/c09\\_gradients.pdf](http://webarchive.nationalarchives.gov.uk/20110407094607/http://dft.gov.uk/cyclingengland/site/wp-content/uploads/2011/01/c09_gradients.pdf).

## **APPROACH RAMPS**

Ramps for cyclists are often shared with pedestrians. In these circumstances the needs of wheelchair users and other people whose mobility is impaired should also be accommodated. The preferred gradient for these facilities is 5% with 8% as the absolute maximum. Individual flights should not exceed 10m and resting places should be provided at least 2m long across the full width of the ramp. (See also B10 Wheeling Channels) (page 2)

As a pedestrian advocacy group, Walk Toronto is striving to reach a technical solution that accommodates as many trail users as possible while limiting conflicts.

### **Convenience factor**

It should be noted that a long ramp without a switchback will extend downstream from the bridge it connects to. Trail users approaching the ramp from points south will not be inconvenienced by the ramp at all since the distance they travel on the ramp equals the distance they would have had to cover on the trail (if they were using stairs). We do admit that a ramp will require users coming from the north to go out of their way. People with disabilities and those pushing strollers are used to accepting this sort of minor inconvenience as ‘the cost of admission’ to environments that they otherwise might have difficulty accessing. As for able joggers and cyclists, they enjoy a certain freedom of movement, and they have the option to use stairs (which will probably soon exist at Dundas and Gerrard, as well as at Riverdale Park).

### **Ramp width**

The DTAH/AECOM memo makes two fundamental assertions regarding ramp width:

1. In order to accommodate two-way traffic – which one assumes will include wheelchairs and bicycles – a ramp should optimally be at least three metres wide.
2. Under *AODA, 2005* “a 2.2m wide ramp would appear to be the maximum width if a central railing is to be avoided.”

The conclusion is then blithely drawn that the two standards are difficult to reconcile. It is recommended that safe conditions would be best maintained if cyclists dismount; but since there is no reasonable way to enforce this, dangerous interactions would likely occur on a long ramp structure.

If we accept the premises of this argument, then trail designers would only be able to build ramps that comply with requirements for both accessibility and safe cycling if their plans incorporate a centre railing. The section used by wheelchairs (not exceeding 1.65 m) would be separated from that used by cyclists (at least 3 m wide). What would result is a total ramp width of approximately 5m, which seems inordinately large, and unrealistic in most trail environments. Clearly, a compromise solution is needed. Walk Toronto has not researched best practices for accessible ramp widths, but we suspect that 5.0 m would be considered excessive by most trail designers.

### **TRCA**

We are fully aware that the Lower Don Trail is routed through an unstable floodplain. The foundations of existing structures such as the Riverdale Park pedestrian/ cyclist bridge have been designed to take challenging local geotechnical conditions into account. We are confident that engineers will be no less successful in coming up with a design for an accessible ramp that meets the TRCA’s requirements. We

recognize that the ramp would have to be located on the downstream of existing bridges, and that a cantilevered component of a ramp would have to be situated at least 6 m above the waterline.

### Cost

It is a given that the cost of an accessible ramp will exceed that of the proposed staircase designs. If we were to accept the minimum cost rationale as a governing principle, then very little accessible infrastructure would be built in Toronto.

### Visual impact

We are proposing that a ramp be constructed in The Narrows, which is not a section of the Don Valley designated as a natural environment area. Indeed, this part of the trail possesses an unmistakably urban ambience. Within the immediate vicinity, trail users are exposed to:

- the Don Valley Parkway
  - one of the busiest highways in Canada
  - lined with high mast lighting on 30m poles
- Bayview Ave., a quasi-highway
- a major commuter rail line
- the channelized Don River
- a major electrical installation



*Not very natural scenery to the east of the Lower Don Trail – including the DVP, 30m high lighting, the Gerrard Street bridge, a transformer station, and Bridgpoint hospital. Also, a few trees survive on the riverbank*

In the Narrows, the aesthetic impact of a long ramp structure will not be inconsistent with its surroundings. Furthermore, the ramp will run parallel to an “Art Fence,” commissioned as part of the first phase of the *Lower Don Trail Master Plan*. Critics of our ramp proposal are skeptical about its maximum length of 240m – but this will be absolutely dwarfed by the 1.6 km long Art Fence! Paul Raff Studio is responsible for the design of the enormous art installation, and the style the studio has favoured with previous projects has been modern and cutting edge. Just as fences can be transformed into works of art, so can ramps be designed as works of fine architecture. **We therefore suggest that an accessible ramp project be undertaken not as an ugly, utilitarian intrusion, but as a visually distinguished adjunct to the Art Fence.** If the two are properly integrated, they have the potential to become showcase features of the Lower Don Trail.

### **Putting the cart before the horse**

We are pleased that DTAH/AECOM has set forth various recommendations that have significant potential to increase accessibility on the Lower Don Trail. However, we must note that the usefulness of these will be hugely enhanced if people with disabilities have safe, convenient, accessible ways of getting onto the trail, close to TTC stops. We must first remove barriers to entry, and then all else follows.

## **CONCLUSION**

**The Lower Don valley constitutes the most sizable body of green space in, or abutting, downtown Toronto. Four streetcar lines pass over the Lower Don Trail, running to some of the densest and most parkland-deficient neighbourhoods in the city. Walk Toronto believes that a fully accessible ramp connection is urgently needed to connect the trail with both local areas and public transit. We advise that the City commence a detailed feasibility study to recommend solutions.**

The cost of building an accessible ramp will exceed those of installing stairs. We suggest that the City tap some of the \$37 million that has accumulated in downtown alternative rate reserves, one the main purposes of which is to fund parkland improvement projects such as the one we are proposing.

Finally, we would like to again thank Councillor Fletcher and her office, City of Toronto staff and consultants for arranging the June 6 site walk, as well as to everyone involved in working with us to improve accessible connections between the Lower Don Trail and the surrounding neighbourhoods.

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For more background, or to discuss this submission, please contact:

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