

**City Planning**

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December 9, 2015

Mr. James T. Purkis  
Executive Vice President  
Regional Express Rail  
Metrolinx  
97 Front Street West  
Toronto, Ontario  
M5J 1E6

Dear Mr. Purkis,

**Subject: Metrolinx Davenport Grade Separation Project**

Further to your letter of December 4, 2015, I want to provide you with some points of clarification and further comments respecting the information you present. My comments are organized in the order of the contents of your letter.

Provincial Commitment

Your letter begins by noting the Provincial commitment to complete the RER transit projects within 10 years, and notes the strong federal, provincial and municipal alignment to deliver this program.

The need to move quickly nevertheless must be tempered with the need to work with municipal partners and communities to fully consider the range of substantive issues that can occur in projects as complex as these. To not do so, or to do so in half measure that does not permit appropriate due diligence is a risk that Metrolinx places on the Provincial commitment.

In this case, the fact that the policy review for all three options under consideration was not available until September of this year suggests earlier internal decision-making that was applied to screen the options down to one (i.e. the "overpass option") was undertaken in absence of this information. To screen options without this key information, and to do so without prior consultation with the City on such an impactful community project, has already impacted the timing of this project and may risk continuing to do so if proper due diligence continues to be circumvented.

Timing of Study Introduction

As indicated in my letters of June 16, 2015, and July 14, 2015, Metrolinx undertook no substantive discussion of this project prior to April 2015, including no attempt to collaborate with City staff on the timing or policy issues.

Assuming this project was raised in a discussion with City staff on July 21, 2014, your letter does not identify who at the City was advised, nor by whom, nor to what extent. The first time City staff were briefed in any detail on this project in the period of 2014 and 2015 was at the first Technical Advisory Committee meeting that took place on April 1, 2015. At that time, the project was identified as one of several Transit Project Assessment Process (TPAP) studies in support of the Province's Regional Express Rail (RER) program. It was noted at that meeting that the TPAP Notice of Commencement would be issued four months later, at the beginning of August.

The Metrolinx plan is to proceed with a TPAP environmental assessment process focussed on the overpass option only. This decision is based on a prior in-house engineering feasibility study completed by Metrolinx and not shared with the City nor the adjacent community. Staff of my Division are required to review projects of this nature, which are potentially impactful to the surrounding local community, in the context of the City's Official Plan (OP) and city building objectives. In this context, Metrolinx should have engaged in detailed discussions of this project with the City as early as 2014, in order to collectively gauge the significant policy implications and the range of solutions available. Unfortunately, that did not happen.

#### The TPAP Process

Your letter elaborates on the public meetings and pre-consultation work that has been part of this process, noting "the purpose of the process is to expedite the approval of transit projects to deliver the transit infrastructure our communities badly need".

While I generally agree with your statement, I must point out that the TPAP process is not intended to circumvent good planning. In the case of the Davenport Rail Grade Separation study, the planning and policy implications should have been documented for all of the options under consideration at the time of the feasibility study work, as a record and as input to the TPAP preliminary planning and decision making. As a partner on transit initiatives in the City of Toronto, Metrolinx should have engaged the City on the options and policy issues at that time, prior to moving forward publicly on this project.

Instead, the draft policy evaluation was produced by Metrolinx in September of this year. The four month period to produce the policy document was necessary to undertake a similar assessment for the tunnel option, which was never completed in any of the earlier work.

#### Project Schedule

Metrolinx has struggled to produce a meaningful project schedule for this initiative, with tasks, timing and achievable milestones. In the summer of this year at the request of senior Metrolinx officials, the City forwarded examples of our project schedules for rapid transit projects to assist in this effort.

To date, the City and Metrolinx still have not agreed to a schedule for this work, primarily because the schedules have not reflected the realities of the effort required for review of study content, and timing has not been co-ordinated to permit a City position at planned public meetings.

Under these circumstances, to summarise your understanding of the project schedule as "well articulated and...well understood" by City officials is inaccurate. Further work is required to develop a mutually agreeable project schedule for this effort.

### Project Delay

As I indicated in my letter of November 24, 2015, there have been delays attributable to Metrolinx, as well as to the City as we have struggled to respond to the compressed project timing.

The production of the policy review document, as detailed above, is an example of a four month delay that is not attributable to the City. Another example is the delay in addressing the issue of a new GO station at this location. In a series of senior level meetings that took place in the summer, City staff were continually assured by Metrolinx representatives this would be discussed at the "next" meeting, only to find it being postponed on a regular basis over a 3-4 month period.

I can appreciate that these types of delays can occur on large complex projects. However, in cases where the delay is attributable to the project proponent, it would seem only fair to adjust the schedule to allow the time originally required for due diligence on the issues to take place. The risk in moving forward and ignoring this need is the potential to create even greater delay at a later stage of work which in turn becomes even more impactful to project delivery.

### Station Analysis

The City has requested Metrolinx consider integrating the station analysis into this project, with the key issue being a better alignment of timing of the grade separation and station assessments. The station analysis should be closely co-ordinated with this work so that the station findings are available before the TPAP Notice of Commencement for this initiative. As indicated in the December 3, 2015 report to Council, the current approach that separates these initiatives, with different timing on outcomes, makes it difficult to gauge the full scope of community benefit and impact under consideration in the Davenport area.

### Need for Careful Planning

Although not addressed in your letter, there is a need to consider this project in the context of City Planning and how it has the ability to change this community now, and for decades to come.

The RER program on the Barrie corridor, including this rail grade separation, is intended to address the needs of existing and future commuters living outside of Toronto, some as far away as Barrie, a commuting distance of more than 100 km. In total, the future service is expected to accommodate approximately 30-40,000 commuters travelling this corridor on a daily basis, with the vast majority destined to downtown Toronto. The existing population in Wards 17 and 18 within which this project is situated totals nearly 100,000 residents. Of these, approximately 20 percent reside within 500m of the portion of the rail corridor that would be elevated with the overpass option.

The degree of increase in train activity to accommodate the predicted increase in commuters is significant - trains travelling through the community on average every 8 minutes, compared to today when there is one train every 30-40 minutes in the weekday rush hours only. This increased level of train movements can be very impactful to the community if not planned correctly. Needless to say, a solution that minimizes the community exposure to these conditions over the 50-100 year life of the undertaking would rank high from a planning and policy perspective.

The impact of increased train activity through this neighbourhood is only exacerbated by a structure rising to a height of 13+ m with noise walls in a corridor where no such structure exists today. The tunnel option is an obvious means whereby to limit these impacts. Significant impacts of the tunnel option relate primarily to

the length of construction period, and changes to Rogers Road. These too, would have to be given careful consideration if the tunnel option were to be pursued. The benefit, however, is that generations of residents would be able to witness the continued revitalization of their community consistent with the city building vision set out in our Official Plan.

Your letter suggests we identify the impacts of the tunnel option "and how the City would participate in managing these impacts". If indeed, Metrolinx decides to modify the project scope to adopt the tunnel solution, the City will give consideration to issues arising from this option. Finally, you also requested that we include your letter in our report to Council, however, your letter was received after the report was submitted to the City Clerk, and there was no opportunity to include it at that point.

Sincerely,



Jennifer Keesmaat  
Chief Planner & Executive Director  
City Planning Division

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Bruce McCuaig, President and Chief Executive Officer, Metrolinx  
Ulli Watkiss, City Clerk, City of Toronto