the centre for
active transportation

75 Elizabeth Street Toronto, ON M5G 1P4 | www.tcat.ca

January 8, 2020

Infrastructure and Environment Committee

Re: Item IE11.17, Electric Vehicle Strategy

Dear Chair Pasternak and Members of the Infrastructure and Environment Committee:

I am the Director of The Centre for Active Transportation (TCAT), a project of the registered charity Clean Air Partnership. TCAT's mission is to advance knowledge and evidence to build support for safe and inclusive streets for walking and cycling. On behalf of TCAT, I'm writing in support of the proposed Electric Vehicle Strategy and propose a few amendments for consideration.

This is a well-researched strategy, undertaken in consultation with a wide range of municipal, industry, and community organizations, that identifies 10 practical actions to eliminate the 30% of Toronto's GHG emissions created by personal vehicles. It lays out a plan to transition Toronto away from the internal combustion engine fueled by gasoline and toward zero-emission vehicles fueled by electricity or hydrogen. Currently, less than 1% of vehicles on Toronto's roads are EVs and Toronto's TransformTO goal is that by 2050, 100% of vehicles will be.

The strategy is introduced with an important reminder that personal vehicles, EVs or otherwise, remain a lower priority than other sustainable mobility options. While EVs eliminate GHG emissions associated with longer passenger vehicle trips not feasible using transit or shared mobility, walking and cycling remain the best zero-emission option available for short trips. To truly achieve transformative climate action, we still need to shift a LOT more trips to walking, cycling, transit, and shared mobility.

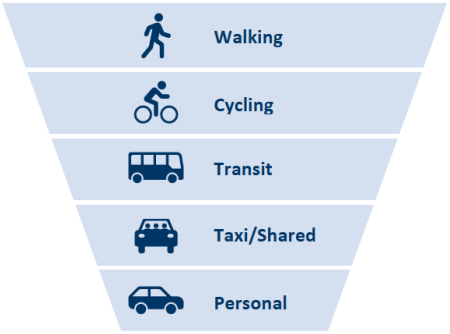


Figure 1: The mobility pyramid emphasizes multimodal mobility before personal vehicle dependency.

The City's TransformTO plan, adopted in 2017, includes two primary components to address emissions in the transportation sector by 2050:
1. 100% of vehicles will use low-carbon energy; and
2. 75% of trips under 5 km be walked or cycled.

Practically speaking, the steps to achieve these two goals are quite different and need to be tackled separately. But both should reinforce and complement the other, and efforts need to be made to ensure that the respective strategies to achieve zero emissions are not in conflict.

Overall, the proposed EV Strategy is excellent and we recommend that City Council adopt it. However, to further compound its zero-emission impact, here are a few friendly amendments for City Council to consider, within each of the four types of actions:

1. Enhance the walking and cycling environment with EV charging infrastructure (Action 2, Activity 4). When identifying high-priority areas for public charging infrastructure, consider the potential impact on people walking and cycling. Do not obstruct or negatively impact the walking and cycling environment (as is happening in the UK), and use the opportunity to enhance it when possible. Consult active transportation stakeholders.

2. Regulations, not incentives, for vehicle-for-hire companies (Action 4, Activity 1). A recent Ryerson study found that Uber and Lyft have added 176,000 motor-vehicle trips a day in Toronto, trips that otherwise could have been made by walking, cycling, or transit. Adding regulations to require the gradual electrification of the vehicle-for-hire fleet makes good sense. Providing incentives to an industry that is adding thousands more vehicle trips to an already congested roadway system and increasing the unsafe conditions on our streets for people walking and cycling, is not.

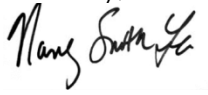
3. Communicate social, environmental and economic impacts of active transportation (Action 7, Activity 1). A critical, yet currently missing, part of the EV communication strategy should be to ensure we don't just swap out existing cars with EVs but to continue to plan a city which decreases reliance on cars, consistent with Toronto's Official Plan. Any communication of EVs should assist people to first assess whether a car is actually necessary and to provide information about the range of more sustainable options to consider.

4. Support sustainable transportation research and economic impact and incentives for companies to replace last-mile trips with smaller and more sustainable vehicles (Action 9 & 10). The EV industry would greatly benefit from research and economic impact promotion supported by the City. This benefit should be extended to more sustainable modes as well. Toronto is home to a burgeoning, yet struggling, bike industry that could also benefit from City-supported industry events and forums, and Pembina recently released a last-mile solutions feasibility analysis on how municipalities can support the implementation of microhubs and cargo cycles. There would also be great benefit to commissioning cross-sector research that does not consider the EV sector in isolation and that would help us to understand how EVs and active transportation can better complement each other, how EVs could better help Toronto achieve vision zero safety goals, etc.

EVs provide a fantastic opportunity to eliminate GHG emissions associated with longer passenger vehicle trips that could not otherwise be made by transit or shared mobility, but walking and cycling remain the best zero-emission option available for short trips. To ensure we achieve the ambitious targets for **both** EVs and active transportation, we need to work together to compound their collective zero-emission impact.

Thank you for the opportunity to comment.

Sincerely,



Nancy Smith Lea, Director
The Centre for Active Transportation,
Clean Air Partnership