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Dear Mesdames & Messieurs:

MAKING METRO 2050 MATTER: STRENGTHENING GOALS & ALIGNING STRATEGIES

The draft Regional Growth Strategy has many laudable goals and strategies. Metro Vancouver's collaboration with TransLink on a coordinated RGS/RTP update is notably commendable and a testament to leadership by elected officials and staff that overcomes significant governance limitations.

There are, nevertheless, fundamental limitations to the goals and strategies that call into question the Regional District's ability to solve the most urgent and pressing problems of any Metro Vancouver board in history, notably the imperative to steward meaningful action on climate change and affordability while protecting scarce taxpayer revenue and advancing regional prosperity.

These are not straightforward solutions involving incremental policy reform. Solving these problems demands a major course correction. It will take immense political courage by the Metro Vancouver Board and staff to roll out policies and a plan that effectively addresses these problems. The transformative responses by every order of government to effectively confront COVID-19 underscore our potential for this course correction.

The urgency of a major course correction is underscored by the catastrophic, multi-billion dollar impacts of unprecedented overland and riverine flooding triggered by intense rain events, this past summer's unprecedented heat wave, and an unprecedented series of wildfire seasons—the emissions of which exceed the province's annual carbon emissions from fossil fuel in three of the last five years. These unprecedented impacts demand an unprecedented response. The draft RGS is the creation of institutions designed to move incrementally and in silos.

The current RGS and land use trends will drive increased transportation GHGs—the region's largest and fastest growing GHG source—congestion, unaffordability and vulnerability to climate change impacts. While the draft RGS includes some commendable work on sustainable civic infrastructure costs, the overarching policies and trends will increase civic infrastructure deficits. The RGS is inadvertently driving a high-cost, high-carbon, high-risk region.

Big revisions will be necessary for *Metro 2050* to conform to the courageous and critical requirements laid out in the new *CleanBC Roadmap to 2030*.

As the IPCC underscores, a sustainable land use agenda is at the heart of a course correction on climate change and the top local government priority. Sustainable land use, moreover, is the lowest cost strategy wedge for meaningful action to cut carbon, congestion, housing, transportation and civic infrastructure costs, and climate-related risks.

Local governments' response to COVID and the catastrophic series of climate change impacts have thrust Metro Vancouver into a unique position to steward this course correction. Failing to make a course correction increases the stakes to local government.

“The cost of reducing regional and global greenhouse gas emissions as well as the costs of adaptation will only grow, the best cost option is to take action now.”

Metro Vancouver, *Clean Air Plan*

This submission outlines key revisions to goals and principles necessary to address the region's most pressing crises and strategies that can deliver on these goals and achieve this course correction.

1. STRENGTHEN GOALS & PRINCIPLES

There are many laudable elements in the goals and principles of draft *Metro 2050*. Given the policy priorities of every local government, Metro Vancouver and the province, there are big omissions that must be addressed.

A. Align climate goals with Metro Vancouver's IPCC 1.5°C Targets & Adaptation Imperatives

Metro Vancouver has adopted scientifically defensible GHG reduction targets.

Transportation is the region's largest and fastest growing emission source. A major driver for emission growth has been urban land use patterns. A disproportionately large share of job and residential growth is located further and further away from major employment hubs (the number one determinant of household carbon and household driving km), the vast majority of general urban fabric is losing density, average commute distances and times are rising, transit mode share is slipping, and vehicle stock growth rates are outstripping population growth rates.

Clean Air Plan Principles

1. Ambitious
2. Evidence-based
3. Equitable
4. Inclusive & Collaborative
5. Preventative
6. Continuous Improvement
7. Prioritize Co-benefits
8. Dynamic
9. Transparent
10. Comprehensive & Integrated

These worthy principles underpin the recently adopted Metro Vancouver *Clean Air Plan* to meet the region's GHG reduction targets. The *Clean Air Plan's* omission of meaningful sustainable land use—local governments' paramount authority—and the inadequacy of *Metro 2050* to contribute meaningfully to the region's GHG reduction targets, in contrast with overwhelming evidence of its importance and mounting catastrophic climate change impacts, behooves the regional district to undertake important RGS revisions.

One key omission in these principles is “taxpayer value for dollar.” Sustainable land use is the lowest cost strategy wedge for cutting carbon, as well as congestion, housing and transportation spending, and climate change impacts. A more sustainable land use agenda is fundamental to comply with *Metro 2050* principles and meet its current goals.

The only jurisdiction globally to drive GHG reductions below 1990 levels is Sweden. While BC is far behind Sweden, we are starting to erect key pillars: 1. carbon tax, 2. vehicle efficiency & ZEV mandates, 3. renewable fuels. Sweden has another key pillar: 4. sustainable land use.¹

According to the European Environmental Agency, Sweden has Europe's lowest rate of sprawl. Sweden has effectively eliminated the loss of farmland and natural areas to sprawl: no commercial, industrial, residential or transportation infrastructure sprawl.

While B.C.'s and Metro Vancouver's transportation GHGs have steadily risen since 2007 (+20%), North America's leading jurisdiction in transportation climate action across North America is California. Seven per cent reductions over the same period. California also employs these four pillars.

The *Clean Air Plan* recently adopted by Metro Vancouver has a 65 per cent emission reduction target for passenger transportation. While there are no land use big moves, the *Clean Air Plan* states:

Strong regional land-use policies are foundational to achieving the targets in the Clean Air Plan. Building compact, mixed-used communities that connect homes, jobs and recreation with walking, cycling and public transit will reduce driving emissions and will support the protection of important lands such as agricultural and industrial lands, and natural areas.

There are negligible, if any, reductions to transportation emissions under the proposed RGS, because the land use regime is not becoming more sustainable. It is, unfortunately, becoming less sustainable.

It takes 30 years for 100 per cent vehicle stock turnover. Of the new vehicles driven off car lots today, the last will be scrapped just after 2050, frustrating long-term carbon neutral commitments. Ninety per cent of these new vehicles are fossil fueled. Moreover, due to auto-oriented urban growth patterns, the total vehicle stock is rapidly rising. Without a sustainable land use plan, there will be more fossil fuel vehicles on Metro Vancouver roads in 2030 than at any other time in history. The 65 per cent reduction target for light duty vehicles in the *Clean Air Plan* is illusory without more sustainable land use.

The RGS is a land use planning agenda. Land use planning is local governments' wheelhouse. If there is any planning agenda where Metro Vancouver should align its GHG reduction targets it is the Regional Growth Strategy. The IPCC underscores the imperative for local government action in land use.

Thousands of cities are undertaking climate action plans, but their aggregate impact on urban emissions is uncertain... Current climate action plans focus largely on energy efficiency. Fewer climate action plans consider land-use planning... Effective mitigation strategies involve packages of mutually reinforcing policies, including co-locating high residential with high employment densities, achieving high diversity and integration of land uses, increasing accessibility and investing in public transport... IPCC, AR5, Mitigation WG, SPM, 2014

¹ Sweden also has fifth and sixth pillars: road pricing in big urban regions and a vision zero agenda (particularly speed limit restrictions), notably on highways.

***effective urban planning can reduce GHG emissions
from urban transport between 20% and 50%.
IPCC, 1.5°C, 2018***

Currently RGS Goal #3 states: “Protect the Environment and Respond to Climate Change and Natural Hazards.” This goal avoids addressing Metro Vancouver’s climate policy imperative to reduce emissions 45 per cent by 2030 consistent with IPCC 1.5°C conclusions regarding emission reductions and the strategic role of local government land use action. To ensure consistency with the *Clean Air Plan’s* “evidence-based” and “comprehensive & integrated” principles, a more sustainable land use agenda must be laid out in the RGS.

Moreover, rather than simply “responding to Climate Change and Natural Hazards,” there is an urgency to *reduce* vulnerability. Abbotsford, Merritt, Lytton, Princeton are currently *responding* to climate change. Private, public and social sectors and citizens deserve proactive measures. *Vulnerability must be reduced* and sustainable land use is the cornerstone. This should be the point of the *Clean Air Plan’s* “preventative” principle.

The new *CleanBC Roadmap to 2030* has underscored the need to robustly integrate urban land use to meet transportation GHG targets. There are ambitious 2030 targets: a combined transit/bike/walk mode share of 30 per cent; and driving distance (VKT) reductions of 25 per cent. These are incredibly ambitious targets. Fortunately, the *Clean Air Plan* is underpinned by an “ambitious” principle. Given the region’s multiple, multi-billion-dollar rapid transit infrastructure lines, Metro Vancouver should assume a responsibility for making more ambitious contributions than the rest of the province.

The province will be “using a climate lens to review provisions in areas such as Regional Growth Strategies, Official Community Plans and zoning.”

With 30 per cent renewable fuels by 2030 and a 90 per cent ZEV mandate for new vehicle sales under the Roadmap to 2030, Metro Vancouver can readily calculate the necessary sustainable urban land use contribution to drive light duty vehicle GHG reductions 65 per cent. An effective road pricing regime can and should contribute. Sustainable land use, invariably, must remain a central pillar. Once again, Metro Vancouver’s, commitment to “evidence based,” “continuous improvement,” and “transparency” principles should drive this analysis, make it available to elected officials and the public and drive direction to RGS 2050.

Not having defensible and quantified modal shift, demand management and GHG reduction targets attributable to land use, renders *Metro 2050* and *Climate 2050*, an inadequate response in the face of steadily growing catastrophic losses costing billions and billions of dollars.

Sustainable land use is, moreover, the lowest cost climate action strategy wedge. As the OECD and the Global Commission on Climate and Economy have underscored, sustainable land use is a negative cost, i.e., a money maker!

Focusing growth along transit corridors and around rapid transit stations cuts congestion and puts riders and revenue into TransLink. Supportive land use can extend improved traffic flow with billion-dollar bridge and highway expansions for decades, delaying (sometimes permanently) further costly expansion. Sustainable land use can cut transportation spending—the largest household expenditure after housing. Sustainable land use can dramatically reduce the magnitude of losses to private and public property,

infrastructure, valuable ecosystem services and human life from climate change. Sustainable land use solutions—outlined in this submission—include some of the least expensive affordable housing solutions available to local government—some are long run money makers.

- ⇒ **Goal 3 should be amended to be consistent with Metro Vancouver’s climate policy, specifically: “Protect the Environment, Meet Metro Vancouver Climate Change Targets and Reduce Vulnerability to Climate Change Impacts and Natural Hazards.”**
- ⇒ **Consistent with Metro Vancouver’s climate policy and *Clean Air Plan* principles, update the RGS with an improved land use plan that quantifies the contribution to meeting Metro Vancouver’s 65 per cent GHG reduction targets in the transportation sector.**

B. Strengthen Equity and Affordability in RGS Principles

Currently Principle 4 in the RGS reads: “provide mobility, housing, and employment choices.” There are, nevertheless, diverse mobility, housing, and employment choices if you are affluent. Options are more limited for lower income households. One major reason for low mobility options is high-cost transportation infrastructure investments—road, bridge *and* transit—and low transit utilization rates due to inadequate land use integration with transit. Local governments and TransLink have immense influence over these decisions. Transit service improvements should manage fare increases. This RTP-RGS agenda will increase upwards pressure on fares because ridership will be inadequate due to land use conditions.

Affordable housing options are more complex and challenging, but there are still immense, untapped policy, financial and cost-effective programmatic interventions to advance affordability in the region, and even more with effective provincial engagement on policy reform.

- ⇒ **Principle 4 should be amended to address the region’s most pressing equity priority, specifically: “Provide affordable mobility and housing choices, and diverse employment choices.”**

C. Strengthen Fairness and Sustainability in Infrastructure Provision Principle

The RGS’s perspective on efficient infrastructure provision is commendable. Metro Vancouver should also endeavour to strengthen the fairness and sustainability in infrastructure servicing cost by Metro Vancouver and member municipalities.

Multi-family households typically pay significantly higher costs per linear metre of civic infrastructure and higher costs per litre of water consumption/sewage throughput than single family households, generally subsidizing single family household infrastructure. While inadvertent, this is an unfair subsidy to low density, distributed development. One of the reasons commercial taxes and utility fees tend to be disproportionately higher is to also subsidize lower density residential areas.

What’s more, taxes and utility fees are inadequate to operate, maintain and replace our communities’ extensive infrastructure (fresh water, sewage as well as stormwater, road, dyke, emergency services), the costs of which will rise dramatically due to their inadequacy to accommodate climate change risks.

Low density urban form is creating a civic infrastructure deficit time bomb that will cause inequitable collateral damage for young people, who will also disproportionately face the most adverse consequences of climate change.

- ⇒ Principle 5 should be amended to address equity and a user pay principle, specifically: **“Support efficient provision and fair and sustainable infrastructure financing.”**
- ⇒ Metro Vancouver and member municipalities should advance costing regimes that better reflect linear metre of sewage, water, storm water and road infrastructure servicing requirements and utilization rates by housing and neighbourhood type.
- ⇒ Revenue generation regimes for water, sewage, road and park infrastructure should, moreover, be sufficient to operate, maintain and replace the infrastructure. These rates should reflect infrastructure requirements and utilization at the neighbourhood scale.

II. GOAL & STRATEGY ALIGNMENT

Major goals are regularly established in regional policy and planning agendas: GHG reductions, modal shifts, driving distance management (vehicle km travelled), affordable housing, environmental protection. These goals are not being met. Our challenge: strategies and actions are not aligned with goals. These goals are achievable with a policy course correction. Alignment can help reduce cynicism in our public institutions.

In the wake of unprecedented extreme weather episodes unleashing catastrophic consequences and a courageous public policy boldness to confront COVID-19, now more than ever people are better prepared for major policy course corrections, notably those with low to zero costs and big benefits. There is an imperative for elected officials and civil servants to frankly delineate how goals—for which there are high levels of support from affordability to climate action to congestion management—can be effectively achieved.

Outlined below are a series of recommendations, organized in seven areas, that can help enable *Metro 2050* to meet its goals. Each area includes recommendations which are systemic and mutually reinforcing, addressing multiple goals.

A. Focus - Driving Fiscal, Social & Environmental Sustainability: Goals 1, 3 & 5

In 1996, the Greater Vancouver Regional District’s Livable Region Strategy established “growth concentration areas” and 13 Town Centres in which to focus growth. In 2011, there were 17 Town Centres in Metro Vancouver 2040. “Growth concentration areas” have been all but abandoned. “Frequent Transit Development Areas” are a commendable new planning designation in *Metro 2050* with untapped potential. They are also being used to justify additional growth centres, some of which are inconsistent with RGS goals.

While policies have long existed to protect agricultural land and natural areas, greenspace is being steadily displaced for residential, commercial and industrial land, undermining regional and local goals. While urban containment should be strengthened, Metro Vancouver just approved the removal of another 400 hectares of Rural designated land surrounding a salmon spawning river to establish industrial land despite other policy solutions.

Distributed, low density growth is a top driver behind the region’s fastest growing emission sector: transportation. Congestion and carbon management targets, fiscally sustainable civic infrastructure systems, food security goals, biodiversity imperatives, transit service expansion, affordability objectives are not being met with historic and proposed RGS policies.

It is inconceivable that any of these aforementioned priorities can be advanced by leap frogging over single family neighbourhoods with plummeting densities to establish new industrial, commercial and residential greenfield growth. To meet *Metro 2050* and *Climate 2050* goals, *focus* is needed:

- ⇒ **Establish a permanent ceiling on the number of Urban Centres. (UBC could be the single exception to this policy. UBC is already a job, study and residential hub bigger than some Regional City Centres.)**
- ⇒ **FTDAs should be established around every rapid transit station outside an urban centre, and along rapid and frequent transit corridors, like the Cambie Corridor, re-allocating growth away from greenfields.**
- ⇒ **Criteria should ensure FTDAs exclude areas which undermine the RGS's goals, e.g.**
 - **Forest and natural area such as East Clayton FTDA is exemplary of what to exclude in an FTDA. This area has the characteristics of a Rural Land Use Designation and was inappropriate for growth, undermining local, RGS and TransLink commitments to climate resiliency, complete, compact growth, congestion and carbon management.**
 - **Proxies for new urban centres that are difficult to serve with transit and will be auto oriented such as Carvolth FTDA, for example, which is increasing local and regional congestion and carbon.**
- ⇒ **While recommendations in other areas reinforce these ones, the most important is under *B. Focusing Growth, Protecting Natural Areas & Agricultural Land*: redesignating all greenfields in the urban containment boundary as Rural, Agricultural or Conservation and Recreation.**

B. Focusing Growth, Protecting Natural Areas & Agricultural Land: Goal 1, 2 & 3

While there are a wide range of benefits, notably local governments' single most important contribution to meeting climate targets, focused growth is critical to address ecological and food security imperatives and reduce vulnerability to climate change impacts. The Draft Strategy states that Member Jurisdictions will be required to “discourage or minimize the fragmentation of ecosystems through low impact development practices that enable ecosystem connectivity (3.2.7).” Given historic, cumulative impacts, partial measures to protect natural areas are inadequate to maintain resilience, manage climate risks and maximize opportunities. Urban growth patterns are the biggest and most consistent driver of permanent forest loss in Canada after energy development—oil, gas and hydroelectricity. Rates in Metro Vancouver are higher than the national average. Urban growth is the biggest driver of agricultural land loss.

A 2020 report by the Nature Conservancy of Canada concluded that the Lower Mainland is one of nine ecoregions in greatest crisis across Southern Canada, a highly significant and threatened region for species at risk and biodiversity conservation. Urban expansion in Metro Vancouver over the past three decades indicates a failure of regional planning to effectively reduce emissions, protect air quality and preserve ecosystem integrity. Continuing to provide reclassifications for new urban centres is a recipe for increased carbon, congestion and ecosystem loss.

- ⇒ **Re-classify all greenfield Rural, Agricultural or Conservation and Recreation, reducing the size of the urban containment boundary, managing the region's biggest historic driver of congestion and carbon (distributed growth), increasing local and regional resilience to climate change impacts, and mitigating rising civic infrastructure deficits.**
- ⇒ **As well as the commendable commitment to increase the total tree canopy within the urban containment boundary from 32 to 40 per cent, a target should be established to grow carbon sequestration within the urban containment boundary, requiring the protection of mature trees**

that reduce the urban heat island effect and that have large root structures that maximize permeability during intense rain events.

Despite stepped up provincial efforts to protect agricultural land, large residential homes and warehouses are still being developed across the region on scarce agricultural land. Agricultural land is vital for climate resilience. Half of the imported food in Metro Vancouver larders is from the United States, notably areas with extreme climate change risks to food production (California and Florida). To take advantage of Canada's opportunity in a warming world and reduce vulnerability to dislocation to global food supply chains due to climate change, protecting Metro Vancouver's agricultural land is essential.

- ⇒ **Restrict the size of residential developments and disallow industrial re-zoning on all agricultural lands in and out of the ALR and all rural designated lands.**
- ⇒ **Establish model bylaw language to integrate into all zoning requirements to minimize surface runoff and maximize resilient urban tree systems that effectively store carbon, maximize passive design and support healthy ecosystems.**
- ⇒ **Require natural asset integration into all infrastructure development by private and public sector entities (local and provincial government) to mitigate risks from overland, run-off and coastal flooding, urban heat island and forest fires.**

C. Capitalizing on General Urban: the Region's Largest Land Use: Goals 1, 3, 4 & 5

A notable omission in the RGS is any policy discussion about the land use that comprises the region's largest share of urban geography: low density, single detached, which is bleeding population density due to demographic change. Never before in history have single family neighbourhoods had such low densities. These hollowed out neighbourhoods adversely impact local retail, affordability, transit ridership, community school enrollment and the vitality of our neighbourhoods. A share of growth should be re-allocated from greenfields into general urban, notably around higher density development surrounding rapid and frequent transit corridors and urban centres. Secondary suites and laneway homes can make a vitally important contribution to affordability, physical accessibility and carbon management.

- ⇒ **All (new and existing) single and semi-detached zones proximate to urban centres and just beyond the first two blocks proximate to frequent transit corridors (which should be designated as FTDA's accommodating higher densities between all urban centres) should be permitted to have at least one primary residence and two accessory dwelling units per parcel.**
- ⇒ **A model building bylaw should be created to require new single and semi-detached housing to be secondary suite ready (two suites per unit). All new secondary suite ready single and semi-detached should be entered at grade at or slightly below grade on bottom floor to increase accessibility for people with mobility impairments and maximize natural light for occupants.**
- ⇒ **See complementary recommendations below regarding *Building Social & Environmental Adaptive Capacity***

D. Protecting the Supply & Enhancing Efficiency of Industrial Land: Goals 1, 2, 3 & 5

Metro Vancouver's prosperity is constrained by a dearth of opportunity on industrial land, not a dearth of land. Vigilance is needed to protect industrial land and use it more productively.

The incursion of residential development and light commercial uses into industrial land should be halted in its tracks, so too, must the incursion of industrial land into farmland and natural areas. After repeated

regional efforts to keep it in the ALR, Campbell Heights has been rezoned industrial, passing over other strategies to support critical industrial activity. A large section of Burns Bog—an exceptional regional wetland with high ecological and carbon storage value—was recently rezoned industrial. This is a short-term gain, long-term pain policy scenario.

Food prices are rising—in part due to climate change impacts. This will episodically continue. In a warming world, food production in Canada is increasingly strategic, but that opportunity is only maximized with agricultural land. Losing high value ecosystems with high carbon storage characteristics is simply bad climate policy when there are options. A huge share of Metro Vancouver’s industrial land is underutilized. If Metro Vancouver aspires to be a world class urban region, local governments must take world class action.

- ⇒ **Treble the region’s available industrial land by upzoning existing industrial land across all municipalities to three storeys (the equivalent height of a single family parcel) and permit downzoning based on compelling reasons for specific industrial land uses.**
- ⇒ **Phase out all incursions into industrial land from residential development unless exchanged hectare for hectare for equivalently useful land.**
- ⇒ **Phase out any incursion of industrial land into agricultural land and natural areas unless exchanged, hectare for hectare, for equivalently valuable agricultural land and natural area land.**
- ⇒ **Exclude employee intensive uses on industrial land unless transit-served or locationally essential to the functioning of industrial activity, based on defensible criteria.**
- ⇒ **Permit appropriate industrial uses in mixed use zones proximate to industrial amenities, notably high value transportation infrastructure.**

E. Building Social & Environmental Adaptive Capacity: Goals 1, 3 & 4

Deeper analysis of social vulnerabilities should be integrated into the analysis of environmental vulnerabilities to understand the real risk of climate change.

Amongst the most distinguishing characteristics of heat wave mortalities during last summer’s heat dome was age (seniors), household occupancy (solo) and urban tree cover (weak). Deeper analysis in other jurisdictions has found other variables: connectedness (socially isolated, strongly influenced by solo occupancy), walkable access to service areas, income, dwelling temperature and ventilation management flexibility.

Currently, 30 per cent of households are solos, disproportionately seniors. By 2030, 40 per cent of households will be solos. By the end of this RGS’s time horizon, it is likely more than half of all households will be solos, disproportionately seniors, and we will be experiencing far more extreme heat events. Amongst its most important functions, a Regional Growth Strategy projects housing requirements. These housing and land use plans must better take into account our current and future demographic vulnerabilities along with diverse interventions to address them and maximize co-benefits.

- ⇒ **The region’s forest, tree density and natural park areas should be mapped, along with walkable service areas, current and future household occupancy and age and to identify heat wave vulnerable areas to prioritize interventions, specifically:**
 - **Strengthened tree policy, urban forest canopy and private tree bylaw, and park creation in nature-weak neighbourhoods.**

- Strengthen mixed use zoning and walkability where there is sufficient density.
- Develop programmatic interventions to support solo seniors becoming landlords by building the capacity of social housing providers—e.g. Metro Vancouver Housing and others—to manage secondary suites on behalf of seniors in exchange for renters providing a basic services for the senior (e.g. shopping, lawncare, cooking, etc.). (This service can be delivered at marginal to no cost, simply with a percentage of rent as a management fee. This is potentially the single most cost-effective strategy for advancing affordable housing, reducing social isolation and cutting carbon. Doubling occupancy in a single family home, ostensibly cuts per capita residential housing GHGs in half.)

F. Advancing Cost Effective Affordability, Congestion and Climate Action: Goals 1, 3, 4 & 5

The draft RGS aims to “develop procurement, disposition, and development plans and actions for land holdings that support the goals of the regional growth strategy and include the provision of affordable rental housing (1.2.25).” This Action should specifically target the integration of affordable housing proximate to affordable transit on underutilized public land and the advancement of zoning and permitting innovations to support low carbon affordable transportation and housing.

- ⇒ **TransLink and Metro Vancouver should work with the province to stack affordable housing, retail and, where appropriate, daycares, offices and market housing atop all new rapid transit stations (including gondola stations) and all bus exchanges proximate to jobs and services. These are grossly underutilized public lands that offer poor returns for taxpayers when—even with affordable rents—they could be generating revenue for TransLink.**
- ⇒ **Diverse zoning and permitting/approval innovations should be advanced that minimize construction costs, minimize land lift and/or permit greater public benefit from land lift that can be used to advance permanently affordable housing in locations with affordable, sustainable transportation options, notably transit.**

G. Linking Transportation Investments to Land Use & Advancing Efficient Urban Freight: Goals 1, 2, 3 & 5

There is a risk that the envisioned extensive “Major Corridor and Major Transit Network” will be fiscally unsustainable and inadequate at incentivizing better urban land use. Proposed transit service plans risk putting upwards pressure on fares threatening low-income households.

- ⇒ **Local governments and TransLink should adopt the Transit Service Guidelines as the basis for service provision. A municipality’s residential and employment density should be the primary basis that determines the nature of service.**
- ⇒ **TransLink and local governments should supplement the Transit Service Guidelines to accommodate appropriate residential and job density requirements for rapid transit, using Ministry of Ontario Transit Supportive Guidelines and Metro Lynx Mobility Hub Guidelines to inform this work.**
- ⇒ **The Major Transit Network map should include residential and job density layers which define a clear hierarchy of transit service.**
- ⇒ **Transit Supportive Policy Agreements developed between TransLink and municipalities to advance sustainable land use associated with large rapid transit projects should be extended from corridor and station area to the surrounding areas. Rapid transit projects, in particular, have immense potential to accelerate car-oriented growth beyond the corridors and station**

areas. Transit financing, notably large rapid transit projects, should leverage the protection of all greenfields from development.

- ⇒ **Local governments should be required to strengthen TransLink revenue generation potential by focusing mixed use growth along corridors, generating ridership and farebox revenue.**

Cycling and bike infrastructure can make an important contribution to managing congestion and carbon and promoting public health and liveable communities. There are, nevertheless, important distance and land use thresholds that powerfully determine cycling propensity regardless of the infrastructure. The draft RGS has long segments in far flung areas with light densities far removed from jobs and services that will make negligible contributions to mode shifting. Proximity to job hubs (#1), service areas (#2) and residential and employment density (#3) determine travel mode and driving distance. This is important in all transportation planning, but acutely important for active travel.

- ⇒ **The envisioned major bikeway network requires a better hierarchy for development based on well-established criteria for utilization and value for dollar investment.**
- ⇒ **Regional financing for bikeway networks should focus on Triple A infrastructure in and around major employment hubs #1 and service areas #2.**
- ⇒ **Bikeway development should be integrated into road capital replacement plans, notably in low density areas far removed from jobs and services.**
- ⇒ **Infrastructure standards for bikeways should reflect density and location.**
- ⇒ **The RGS Map should be strengthened with a hierarchy that reflects residential and job density layers and major job and services hubs that define a clear hierarchy of bikeway development priority.**
- ⇒ **The bikeway network should be integrated with a regional parking strategy, including the retirement of parking along routes to safely accommodate cycling.**

Urban freight is the fastest growing source of regional GHGs and congestion and requires immediate attention. The solutions, nevertheless, are mature:

- ⇒ **Accelerate progress on an urban Regional Goods Strategy, with emphasis on courier and logistical services.**
 - **Prioritize the set-up of basic neighbourhood and sub-regional logistical hubs for pick up and drop off for all urban freight**
 - **Establish a commercial vehicle licensing program with varying fees that targets the logistical and courier sector, requiring and/or powerfully incentivizing the use of efficient neighbourhood and sub-regional logistical hubs and no-rush delivery service and the use of zero emission vehicles and electric assist bikes.**
 - **Establish an impact investment program to help capitalize the cost of zero emission delivery vehicles and electric assist cargo bikes.**
 - **Integrate the region's transit system into courier and logistical activity.**
 - **Create an RGS Map with approximate provisional locations for sub-regional logistical hubs.**

Strengthening Goal and Strategy Alignment on the Ground

Recent decisions by Metro Vancouver in South of Fraser East underscore the lack of alignment between goals and strategies. Despite repeated opposition regionally to removing South Campbell Heights—an

area with significant ecological value, named after a salmon bearing river—from its Rural designation, Metro Vancouver recently approved Industrial land redesignation.

The decision is inconsistent with historic and current RGS goals (and the RGS Industrial Lands Map which is to be approved by each municipality), and broader Metro Vancouver goals, notably meeting IPCC 1.5°C 2030 targets, and strengthening resilience to climate change impacts. As has been underscored, removing natural systems increases surface runoff which has downstream consequences. The decision to expand the region’s urban containment boundary at a time when the urgency of making—versus undermining—progress on key goals requires limiting greenfield growth.

This decision will, moreover, further frustrate efforts to establish Surrey City Centre as the region’s second biggest central business district which is of benefit to the entire region in terms of managing congestion and carbon. Surrey City Centre scarcely has more jobs than MetroTown and even Lonsdale (without any SkyTrain stations) despite this well-established local and regional objective. Surrey has never met its City Centre growth targets despite having the highest growth rate across the region because so much development energy is focused on commercial, residential and industrial greenfield growth beyond City Centre. A rising share of this growth has been beyond frequent transit corridors.

Redesignating this land will now also undermine efforts to focus growth in the Surrey-Langley Skytrain corridor, another imperative to manage congestion and carbon across the region. The failure to allocate growth to this low-density corridor will also compromise riders and revenue with knock on upwards pressure on regional TransLink service budgets with regional implications to transit service.

There are numerous strategies and actions in *Metro 2050* and this submission that are designed to support goals that are at odds with this decision, including compelling strategies to protect and expand industrial growth. The short-term benefits of this decision will have long term costs to the City, the Region and beyond.

The Region can do better!

Metro Vancouver cannot meet its goals with the draft Metro 2050. Many strategies, in fact, take us further away from rather than towards these shared goals. Leadership is necessary to steward major course corrections. Local governments’ response to COVID-19 and the catastrophic series of climate change impacts across B.C. have thrust Metro Vancouver into a unique moment where the public is ready for this leadership. Failing to make a course correction will only exacerbate these impacts.

“The cost of reducing regional and global greenhouse gas emissions as well as the costs of adaptation will only grow, the best cost option is to take action now.”

Metro Vancouver, *Clean Air Plan*

Respectfully,

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