

November 20, 2024

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Environmental Policy Office
(Submitted through Environmental Registry
of Ontario)

Re: Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 - Framework for bike lanes that require removal of a traffic lane.
ERO number 019-9266
Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 – Building Highways Faster Act, 2024
ERO number 019-9265

Ontario is experiencing rapid population and economic growth, particularly in urban centres and surrounding regions. This growth demands a modernized approach to integrate land use and transportation planning to accommodate increased development while maintaining the ability to move people and goods effectively. On a municipal level, cities are responsible for providing safe and efficient transportation networks for all users. Cities achieve this by using a variety of tools available to build wisely and maintain effective, affordable and connected transportation networks:

- Cities are obligated and committed to provide public service facilities, including roads and active transportation corridors with a goal to reduce traffic and create safe roadways that include multiple options including walking, cycling, public transit and driving
- Bike lanes are an integral component of a connected system that supports inclusive and complete communities in accordance with the direction of provincial policies
- Bike lanes are a tool to help ensure that road design is convenient, equitable and provides options for people to access their daily needs

Proper planning for growth is an essential service municipalities must provide for the benefit of all people living in Ontario. Without careful planning the increasing development could:

- Compromise the integrity of existing transportation networks
- Lead to increased congestion, reducing the efficiency of transportation corridors, goods movements and transit
- Erode environmental sustainability, including impacts on green spaces, agricultural lands, cultural heritage and waterways
- Create challenges for municipalities in balancing infrastructure investments with growth needs
- Add to a growing asset base of infrastructure for which municipalities are not able to sustainably afford the full lifecycle costs of maintaining those assets

Bill 212 introduces measures contrary to the principles of good planning, including those in *Environmental Assessment Act*, municipal Official Plans and the Provincial Policy Statement. The proposed Bill establishes an additional bureaucratic layer for infrastructure improvements, contrary to Provincial initiatives to reduce red-tape. The proposal will restrict municipalities' ability to plan, design and implement safe multi-modal transportation systems in accordance with community-developed and Council-approved visions and priorities.

To support growth while still moving people and goods effectively, Bill 212 should be revised to:

- reinforce municipal authority to align development with existing transportation networks;
- support municipal initiatives to encourage travel by transit and active transportation, recognizing these modes are more cost effective and more efficient in the long term;
- prioritize policies that support investment in transit infrastructure and active transportation, ultimately with a goal of building communities with reduced car dependency; and,
- maintain protection of natural and cultural heritage features through a strong and robust environmental assessment process for major highway corridor projects.

Bill 212, in its current form, undermines the very transportation and land-use planning principles necessary to support Ontario's growth. To ensure sustainable development, the legislation must be amended to reinforce integrated planning, preserve strategic transportation networks, and align growth with economic, social and environmental objectives.

The need for a rethink of this Bill is reinforced by the outpouring of statements and positions being released by countless organizations representing the many professional fields that grapple with the intersection of land use planning, infrastructure investments and planning our transportation systems daily. We support the positions to revisit this Bill put forward by the Ontario Professional Planners Institute, the Ontario Society of



Professional Engineers, the Canadian Institute of Transportation Engineers, the Ontario Traffic Council, the Association of Ontario Municipalities, the Ontario Public Health Association, Good Roads, the Ontario Association of Architects, the Ontario Association of Landscape Architects, and countless municipalities across the Province of Ontario.

City of Peterborough staff would be happy to assist provincial officials in making improvements to Bill 212 that would achieve the stated goal of reducing gridlock through evidence-based approaches. Further, we would be willing to assist the Province with development of new policies and programs to support municipalities in their efforts to plan and build efficient and connected transportation networks for all users.

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