

Statement of Opposition to ERO 019-9266 (Bill 212)

2024-11-04

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To the Ontario Ministry of the Environment, Conservation and Parks:

Over the years I have appreciated the Ford government's efforts to improve transit infrastructure in Ontario with projects such as the Ontario Line, the GO Expansion, One Fare, and Transit Oriented Development. However, I do have disagreements over other measures this government has proposed.

I would like to affirm my strong opposition to Bill 212, the so-called *Reducing Gridlock, Saving You Time Act, 2024*, particularly regarding Section 4 of Schedule 4 and the proposed regulation ERO 019-9266. If passed, this will make building proper cycling infrastructure significantly more difficult and even forcibly rip out existing bike lanes which tens of thousands of people actively depend on. Despite this government claiming to be "for the taxpayers", they are going spend millions on destroying infrastructure which was approved in an extensive consultation process. It is extremely wasteful and insulting to see the tax money of Ontarians be used to forcibly destroy public infrastructure for no good reason. This is especially true during a time when numerous important public services are critically underfunded, such as healthcare and education,^[1] or better yet, that money could be added to the tax rebate that this government plans on giving out.

Previously, this government said that it would respect the decisions made by local councils in regards to urban planning, particularly by not legalizing fourplexes province-wide.^[2] However, it seems that this government has forgotten that and they will instead be making decisions for local councils. This is just wrong on a fundamental level as this type of intervention over cities sets a dangerous precedence as to what future governments

could do. They will be much more empowered to overreach and force cities to do things against the interests of their residents.

Furthermore, commuting by bike has proven to be beneficial for one's fitness, sustainable for the environment and financially responsible. Cycling can also reduce gridlock for others as every person who chooses to bike is one less car on the road, and you don't need to spend billions on a tunnel underneath the 401 to do that. However, it can only be done if the proper dedicated infrastructure is built to ensure that cycling can be done safely and efficiently. A lot, if not most of the current infrastructure has cyclists close to or in the same lanes as cars, with no protection and only minimal signage to alert cars of potential cyclists. This would be like expecting cars to drive on roads shared with high-speed freight trains. It's simply not safe, especially with cars only getting bigger and heavier over time.^[3] Cycling infrastructure needs to be dedicated with a protective buffer to ensure cars don't accidentally drive into them. There are tens of thousands of people who want to cycle and will get out of their car to do it as their regular commute, but only if it becomes safe.^[4] However, this government insists on impeding and even destroying the proper infrastructure needed to do it. I'm not saying that people should be forced out of their car and onto a bike, but rather that safe infrastructure should be available to those who would like to cycle, and that this government not impede the construction of such.

As for the government's claims of increased travel times and damage to small businesses,^[5] studies have shown that bike lane infrastructure does not significantly worsen car gridlock,^{[6][7]} and the Chief of Toronto Fire Services has confirmed that bike

lanes do not negatively impact the response time of emergency services.^[8] So these lanes don't bring any harm to car traffic. Further, numerous studies have shown that areas with dedicated bikes lanes drive up local business sales.^{[9][10]} This is corroborated by the Bloor Annex BIA, which has released a statement opposed to the removal of the bike lanes in their area, stating that they have been beneficial their businesses.^[5] Surely a government which constantly claims to support local small businesses would not put said businesses' bottom lines at risk by destroying infrastructure which helps drive customers.

I would also like to clarify that I am not against cars in the slightest. I understand why a lot of people need or would prefer to drive. What I am saying is that infrastructure should be built to give people options on how they commute, and that the provincial government should stay out of this and leave the decisions on bike lanes to the municipalities because, in the Premier's own words regarding local planning, "Queen's Park doesn't know best".^[11]

If this government is firmly insistent on wasting millions of taxpayer dollars on the destruction of cycling infrastructure which hundreds of thousands of commuters and business depend on, then I would request the following amendments:

1. The provincial and municipal governments be required to plan and secure a contract for a replacement bike lane which conforms to the new standards of Bill 212 before commencing any removals of existing lanes; and
2. The approvals process for replacement bike lanes be expedited, like what was done with Highway 413.

If this government is truly “not anti-bike-lane” and only for “common-sense”,^[12] then they will take these proposals into account to ensure that cyclists are properly accommodated before spending millions on destroying the existing infrastructure that they depend on.

Again, I would like to reiterate that I have appreciated this government’s improvements to public transit infrastructure, but this type of bone-headed policy making is extremely concerning and makes me doubt my confidence in this government. The fact that this government has ignored the disapproval from millions of Ontarians over this proposal only solidifies that doubt. Therefore, I strongly urge that ERO 019-9266 and Section 4 of Schedule 4 of Bill 212 be dropped immediately.

References

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