Ontario Professional Planners Institute

E info@ontarioplanners.ca
T 1 800 668 1448
ontarioplanners.ca

4881 Yonge Street, Suite 401,
Toronto, Ontario, M2N 6Y9

November 18, 2024

Hon. Prabmeet Sarkaria
Minister of Transportation
5th Floor – 777 Bay Street
Toronto, ON M7A 1Z8

Dear Minister Sarkaria,

RE: ERO 019-9266 – Bill 212, *Reducing Gridlock, Saving You Time Act, 2024* – Framework for bike lanes that require removal of a traffic lane

On behalf of the Ontario Professional Planners Institute (OPPI), we are writing to provide feedback on the Ministry of Transportation's proposed changes to bike lanes that require the removal of a traffic lane as outlined in ERO 019-9266 and Bill 212, *Reducing Gridlock, Saving You Time Act, 2024*.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPPs) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions. Our members work across a geographically diverse cross-section of Ontario – from small towns to big cities, from northern Ontario to the Greater Toronto Area. In addition to our geography and professional affiliations, there are a considerable number of professional planners who dedicate their life's work to the practice of transportation planning – the integration of land use and mobility for safe, efficient and equitable travel between day-to-day destinations.

Based on our review of the proposed legislation, we understand that Bill 212 and the complementary ERO posting seek to:

1. Remove sections of the Bloor Street, Yonge Street and University Avenue bike lanes in the City of Toronto and return them to a lane of traffic for motor vehicles.
2. Provide the Minister with the authority to establish a review process for other existing bike lanes where traffic lanes were removed, and the authority to remove those bike lanes.
3. Require prescribed municipalities to seek provincial approval for new bike lanes that remove existing lanes of traffic for motor vehicles.

OPPI does not support the removal of bike lanes in the City of Toronto or in any other municipal jurisdiction within the province of Ontario. The implementation of cycling infrastructure has gone through a robust evaluation process to determine the appropriate location, design, construction and funding considering the unique context within which they are being considered. Cycling routes and facilities are recommended by professional planners, engineers and other professional practitioners through municipally prepared and adopted plans and strategies which provide further detail and alignment with approved Official Plans and Transportation Master Plans. The Ministry of

E info@ontarioplanners.ca
T 1 800 668 1448
ontarioplanners.ca

4881 Yonge Street, Suite 401,
Toronto, Ontario, M2N 6Y9

Transportation also issues Ontario Traffic Manual Book 18 – Cycling Facilities to provide guidance on the planning, design and operation of cycling facilities in Ontario that municipalities consider when determining the location of new bike lanes. Across Ontario, municipalities undertake detailed consultation and studies before recommending bike lanes or reducing car lanes. Planners are an important part of this process and apply a technical, unbiased lens when considering new bike infrastructure while also considering the wider impact on the overall transportation system including cars, electric vehicles, goods movement and transit.

OPPI will defer to the staff report prepared by the City of Toronto's Planning and Transportation Services departments on specific impacts related to the proposed removal of three existing bike lanes in the City of Toronto.

With regard to the Ministry being the approval agency for the implementation of cycling infrastructure, OPPI is concerned that this approach may not improve efficiency and is counter to streamlining the approvals process. More specifically:

- Developments have been approved with assumptions around multi-modal travel including the completion of numerous traffic impact studies. These developments may be delayed as a result of additional time and effort that needs to be spent by ministry staff to determine the appropriateness of those systems.

- It will be unclear how the approval process with the Minister of Transportation would be triggered in the first place considering how roadway projects unfold at the municipal level as the range of project types is varied including but not limited to an asphalt resurfacing project, to a road rehabilitation project to a full reconstruction project with new sewers and watermains. The workload of managing this will impact all project types. The Ministry would need to develop a framework to help clarify this and ensure that there is sufficient knowledge and capacity at the Ministry to accommodate the number of requests for approvals and engagement that would be required.

- Grants from other levels of government are often tied to other municipal objectives (like active transportation) which in turn mean an integrated road renewal project could be impacted if not advanced with a bikeway option. This leaves the potential for considerable setbacks from a funding and construction perspective which could have an adverse impact on overall housing targets and timelines. There should be sufficient engagement with the Federal Government, Ontario Public Health, etc. regarding their priorities and how this would impact existing and future funding requirements.

As cities grow, transportation options other than a personal automobile become essential to moving people efficiently. Many streets in large urban areas are already congested and cannot physically accommodate any more cars as our population increases. One lane of mixed traffic can move up to 2,000 passengers per hour in optimal conditions. However, a dedicated bike lane can move up to 12,000 passengers per hour.[1] Implementing a network of dedicated bike lanes can

[1] Transportation Urban Mobility Initiative, https://commons.wikimedia.org/wiki/File:Passenger_Capacity_of_different_Transport_Modes.png

significantly improve the ability to move people around a city. In addition, road and road widening projects are widely recognized as expensive, environmentally harmful, and ineffective at reducing traffic congestion.[2]

Tackling gridlock means finding practical solutions informed by evidence-based planning. To support our economy and to build livable communities, Ontario should focus on ensuring that our streets move the most people possible, rather than the greatest number of personal automobiles. OPPI strongly encourages a greater more wholistic shift towards complete streets. Complete streets allow for a roadway to be designed in a way that appropriately accommodates and is considered to be safe for all users while also increasing the capacity for moving people on all modes, including cars, pedestrians and cyclists. It is people – not cars – who power our economy, spend money at small businesses, and help the Province grow. Moving the most people possible means accommodating all modes of travel on our streets and ensuring that those who choose not to drive are safe to do so.

The case for the planning, design and implementation of bike lanes is compelling. This is not about taking space away from people who want to drive their car or prioritizing cyclists over vehicles. This is about providing Ontarians – all Ontarians – especially those who are not able to consistently get access to a vehicle the option to use other modes of transportation in a safe, comfortable and efficient manner. This is about creating complete communities that are sustainable, efficient and healthy. It is about reducing red tape and approvals for a planning practice that is currently working efficiently and effectively.

OPPI requests the Ministry not to proceed with the removal of bike lanes or add further requirements around the approval of new bike lanes on the following rationale.

Congestion and Traffic

- **Road Experience:** Bike lanes (in particular, physically separated bike lanes) improve the driving experience by separating cyclists and other micromobility users from cars. Drivers are required to leave at least one metre between their car and a cyclist to ensure safety in situations where there is not a dedicated bike lane. A bike lane reduces conflict and results in cars and trucks flowing easier on the road, and cyclists are kept safe in their own lane. Without bike lanes, cars need to slow down for cyclists, slowing the flow of traffic and increasing the likelihood of conflict.

- **Efficient Use of Limited Road Space:** Many of our roads, especially in larger cities, cannot be widened due to the lack of available space in the corridor. This requires creative solutions to reduce gridlock on those corridors. With limited space, planners know that creating incentives to walk, cycle or take public transit is not only the right policy decision, but one that frees up space for people who need to drive. Cycling infrastructure fulfills a critical role in overall mobility capacity.

[2] National Center for Sustainable Transportation, https://escholarship.org/uc/item/3q21f88p

Road Safety and Design

- **Safety:** Road user safety is the first and foremost consideration in roadway design. People who cycle are disproportionately killed or seriously injured in collisions with people in motor vehicles. The majority of cyclist deaths occur on streets without protected cycling infrastructure. In the City of Toronto, 28 people have been killed and 380 people have been seriously injured over the past 10 years while cycling with 68% of those collisions taking place on streets without safe cycling infrastructure. Protected cycling infrastructure also leads to safer roads for all users. In Toronto, research indicated that bike lanes reduced car conflicts by 71%, bike conflicts by 61%, and car-pedestrian conflicts by 55%.[3] Global experience also demonstrates that separated cycling infrastructure provides substantial safety benefits to all road users. [4]

- **Network Connectivity:** There is no alternate network of 'side streets' that could effectively deliver a network for bike lanes within the overall city-wide street network. In large urban areas, like Toronto for instance, street networks have evolved in a way that 'side streets' (e.g. local and collector streets) are largely discontinuous, discourage 'non-local' traffic, and put people back onto the major arterial streets as soon as possible. As a result, there is no alternate network of minor streets that connect different parts of the city that could form an effective network of cycling infrastructure.

- **Encouraging Mobility Choice:** Cycling infrastructure improves safety, which is fundamental in encouraging the uptake of cycling and other mobility alternatives to the car. The lack of safe cycling infrastructure, and further contemplating the idea of removing well-rationalized cycling infrastructure, is inconsistent with the ideals of the planning and engineering fields and serving of the public interest.

Economy

- **More Customers for Businesses:** Bike lanes generate economic activity and are supported by local businesses including key local business groups such as the Financial District, Entertainment, St. Lawrence, Bloor Annex, and Mirvish Village BIAs in the City of Toronto.[5] In one case a study found that customers increased by 30% over a two-year period after bike lanes were installed.[6]

- **Supporting the Gig Economy:** Bike lanes also support workers in the gig economy, such as delivery service workers, who use bike lanes to deliver food and goods efficiently and without getting stuck in traffic. Cycling infrastructure supports a safer working environment for those in the Gig Economy who rely upon a network of cycling infrastructure to safely

[3] Cycle Toronto, https://www.cycleto.ca/businessmeansbusiness
[4] Journal of Transport & Health, Why cities with high bicycling rates are safer for all road users - ScienceDirect
[5] Cycle Toronto, https://www.cycleto.ca/businessmeansbusiness
[6] Cycle Toronto, https://www.cycleto.ca/businessmeansbusiness

E info@ontarioplanners.ca
T 1 800 668 1448
ontarioplanners.ca
4881 Yonge Street, Suite 401,
Toronto, Ontario, M2N 6Y9

conduct their daily tasks, to which every worked in entitled. This also serves to support those who rely on receiving those services (such as food delivery) at their doorstep.

- **Supporting Bike Share Systems:** In 2023, Bike Share Toronto riders made 5.7 million trips by bicycle, nearing doubling the 2.9 million rides taken in 2020.[7] This type of mobility provides people with an inexpensive and efficient way to move around without contributing to gridlock by getting in their car. Bike lanes ensure that bike share remains safe and accessible to all, especially casual cyclists.

Public Health

- **Chronic Diseases:** As outlined in the submission made by the Ontario Public Health Association, the promotion of active transportation such as cycling has significant health benefits including decreasing the likelihood of chronic diseases including diabetes, coronary artery disease, depression, and all-cause mortality. In contrast, increase time engaging in stationary activity such as driving can lead to obesity and cardiovascular disease.

- **Mental Health & Wellbeing:** Numerous studies have demonstrated a significant positive impact to mental health and wellbeing of individuals who engage in active transportation choices such as biking. A recent study reported that individuals who recently switched to cycling to work report many benefits including 70% more energy throughout the day, 51% report less stress during the workday, 42% have a boost in job satisfaction, 40% cite a rise in their drive to innovate, 30% say they were less likely to resign in the next six months, and 27% experience increase in overall productivity.[8]

Air Quality and Climate Change

- **Greenhouse Gas Emissions (GHG):** Encouraging mode shift away from cars to alternative transportation options can have a significant positive impact on the environment. Studies have shown that choosing a bike over a car just once a day can reduce an average person's carbon emissions from transportation by 67%[9]. Measures that make it easier and safer for individuals to choose cycling over taking their car will help achieve these GHG reductions. Measures that reduce the availability of safe cycling infrastructure would have the opposite effect.

[7] City of Toronto, https://www.toronto.ca/legdocs/mmis/2024/cc/bgrd/backgroundfile-250545.pdf
[8] Robb Dorr, https://www.forbes.com/sites/bryanrobinson/2023/10/05/surprising-new-way-of-getting-to-work-benefits-mental-health-plus-2500-annual-savings/
[9] Bloomberg, https://www.bloomberg.com/news/articles/2021-03-31/switching-from-cars-to-bikes-cuts-commuting-emissions-by-67

E info@ontarioplanners.ca
T 1 800 668 1448
ontarioplanners.ca

4881 Yonge Street, Suite 401,
Toronto, Ontario, M2N 6Y9

Inclusive and Complete Communities

- **Affordability:** Automobile ownership is unaffordable for many, especially when considering the increasing costs of other necessities including housing and food. Cycling provides an affordable mode of transportation, particularly for those who do not drive cars due to age, income, or ability.

- **Equity**: Providing safe streets for all users is fundamental to ensuring equity in mobility. Historically, streets have been designed with a 'vehicle-centric' focus. Better protecting vulnerable street users, including people who cycle, improves equity for all modes. It also improves equity for people who do not have access to other modes, for whatever reason (including financial, age, disability, not having a driver's license, lack of viable transit options, etc.).

- **Lifestyle Decisions:** Many Ontarians are also choosing to use bikes and e-scooters as an active lifestyle choice for all or select day to day trips. This isn't about the economic opportunity as many of these individuals come from a wide range of economic backgrounds. They are selecting to choose alternate modes of transportation over vehicles for personal ethos reasons. In many municipalities, new housing such as condominium apartments and rental buildings are built without parking, meaning that transit and micromobility options are the primary ways that people travel.

Policy Conflicts

- **New Provincial Planning Statement:** The *Provincial Planning Statement (2024)* establishes policies with which land use and infrastructure planning decisions must be consistent. Section 3.2 details policies for Transportation Systems, which include facilitating the safe and energy efficient movement of people and goods (policy 3.2.1), making efficient use of existing infrastructure including transportation demand management strategies (policy 3.2.1), and creating a multimodal transportation system (policy 3.2.3).

- **New Housing Units:** The Ontario government is focused on unlocking 1.5 million homes over a 10-year period. Many of these homes will be in large urban areas with already strained road capacity. Removing or slowing down the implementation of bike lanes will increase congestion and reduce the viability of many potential housing developments as studies will indicate that the road capacity cannot accommodate a significant increase in users in many situations, barring transportation alternatives such as increase in road capacity due to separated bike lanes.

- **Public Transit Investment Depends on Last Mile:** Ontario is investing a record of $70 billion in new transit over the next decade. Robust transit ridership is dependent on connecting users to their final destinations via the "last mile". A mix of modes of

transportation such as bikes is critical for the success of this new transit and is assumed in new transit ridership projections by Metrolinx.

- **Removal of Parking Minimums in PMTSAs:** Ontario's Bill 185, the *Cutting Red Tape to Build More Homes Act, 2024* not only removed parking minimums in Protected Major Transit Station Areas (PMTSAs), it prohibited Official Plans and Zoning Bylaws from requiring an owner to provide and maintain vehicular parking, an ambitious decision which will result in more homes near transit which rely upon alternative transportation modes including cycling. Notably, bicycle parking was specifically exempted from this provision. The City of Toronto has proposed several PMTSAs under OPA 570 that includes ones with existing bike lanes that the Province is proposing to remove. To support the Bill 185 policy, it is imperative that cycling infrastructure be kept and/or provided as an alternative to driving as parking for cars will become less frequently available.

- **Not Just Bikes, All Micromobility:** Ontario recently extended its *electric kick-style scooters (e-scooters) pilot* to November 2029.[10] This emerging form of micromobility represents another use for bike infrastructure which helps to decrease the number of cars on the roads, reducing gridlock. It also provides another important component of range of mobility options for a growing segment of urban conditions. The City of Toronto's TransformTO Climate Change Action Plan has committed to converting 75% of trips under 5 km to walking, cycling or transit. Micromobility will assist in achieving this goal.

- **Planning Act:** Ontario's main legislation governing planning, the *Planning Act, 1990* contemplates a series of provincial interests including health and safety, sustainable development that supports transit, climate change mitigation and adaption, adequate and efficient transportation systems, orderly development of safe and healthy communities, etc. The approach in Bill 212 is inconsistent with many of these interests.

Capacity in the System

- **More Onus on the Ministry of Transportation:** Ontario's proposed framework for assessing new bike infrastructure creates another layer of bureaucracy and duplication for Ministry of Transportation (MTO) staff. Largely, MTO would be duplicating the detailed work undertaken by municipalities when planning new cycling infrastructure, contrary to the government's goal of reducing red tape. MTO also lacks the local context, local expertise and nuance that municipalities have. MTO would need to hire significant staff that understand local context to evaluate bike lane proposals which has significant cost implications.

In summary, OPPI does not support the removal of bike lanes in the City of Toronto or in any other municipal jurisdiction within the province of Ontario. Should the Ministry of Transportation proceed with the plan to review other existing bike lanes and approve new bike lanes, OPPI recommends a robust consultation process with impacted stakeholders including industry, municipalities and

[10] Government of Ontario, https://ero.ontario.ca/notice/019-9099

Ontario Professional Planners Institute

E info@ontarioplanners.ca
T 1 800 668 1448
ontarioplanners.ca

4881 Yonge Street, Suite 401,
Toronto, Ontario, M2N 6Y9

professional associations. OPPI would be pleased to bring forward a group of transportation planners to help the Ministry develop a process to review bike lane proposals.

In addition to the comments OPPI has provided in this submission, our organization also endorses the submission made by the Ontario Public Health Association and the Ontario Traffic Council that outline the impacts on public health and further safety considerations as they relate to the proposed legislation.

Thank you for the opportunity to provide feedback on your Ministry's proposed changes to bike lanes that require the removal of a traffic lane. The OPPI leadership team would like to request a meeting with you and/or your Ministry officials to further discuss this submission.

Please feel free to contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,

Claire Basinski, MCIP, RPP, CP3
Chair
Ontario Professional Planners Institute

Susan Wiggins, CAE, Hon IDC
Executive Director
Ontario Professional Planners Institute

CC: Felix Fung, Assistant Deputy Minister, Integrated Policy and Planning Division, MTO
CC: Dawn Irish, Director (Acting), Indigenous Relations and Environmental Policy Branch, MTO
CC: Katerina Downard, Environmental Policy Office, MTO
CC. Kevin Churchill, President, The Ontario Public Health Association
CC. Geoff Wilkinson, Executive Director, The Ontario Traffic Council