

November 20, 2024

Katerina Downard
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Canada

Re: Response to ERO 019-9266 Reducing Gridlock, Saving You Time Act, 2024 - Framework for bike lanes that require removal of a traffic lane.

Dear Ms. Downard,

Thank you for the opportunity to comment on the proposal of Bill 212 - Reducing Gridlock, Saving You Time Act, 2024 - Framework for bike lanes that require removal of a traffic lane, posted by the Ministry of Transportation on the Environmental Registry of Ontario (ERO 019-9266). On behalf of the City of Brampton, we appreciate the Province's commitment to improving transportation across Ontario and welcome the opportunity to contribute to this important dialogue.

Brampton has been steadily advancing its active transportation infrastructure in line with local policy directions and best practice standards, guided by a strong commitment to sustainability, urban growth management, and multi-modal mobility. We are pleased to report that our efforts align closely with the objectives of the 2024 Provincial Policy Statement (PPS), which emphasizes sustainable and active transportation as critical components of community development.

The following sections present Brampton's local policies and initiatives related to active transportation infrastructure and the context within which we have been working to achieve the implementation of an integrated, multi-modal network that will support the city's growth and development.

Brampton Plan

Brampton's Official Plan (Brampton Plan), endorsed by Council in November 2023, contains clear commitments to advancing active transportation as a key part of its vision for a sustainable, livable, and connected city. The plan integrates active transportation with broader objectives related to environmental responsibility, community health, and economic vibrancy.

As Brampton transitions from a car-oriented suburb to an urban city over the next 30 years through intensification and infill development, there needs to be a greater emphasis on sustainable modes of transportation. The Plan establishes a mode share target of 11% for active modes of transportation.

Brampton Plan is committed to reducing car dependency by making active transportation a viable and attractive alternative. The development of a safe and accessible active transportation network to encourage cycling, walking, and other non-motorized travel modes includes the implementation of bike lanes to help connect residential areas to key destinations like schools, workplaces, and transit hubs.

Brampton is one of Canada's fastest-growing cities, and encouraging active transportation is a crucial strategy to manage this growth sustainably. The implementation of bike lanes that involve motor vehicle lane reduction is one of many of our approaches to increase mobility options, road safety, and ultimately fighting congestion and urban sprawl, both of which challenge the vision of a well-planned, transit-oriented, and compact community. We hope that Bill 212 will not compromise the ongoing efforts Brampton has been working on to effectively foster a shift away from car dependency in order to achieve its sustainability goals.

On the Move: Brampton Mobility Plan

The Brampton Mobility Plan is currently under development and is designed to shape the future of mobility in Brampton. This comprehensive plan aims to integrate various modes of travel—including walking, cycling, and public transit—into a cohesive, efficient, and accessible system that meets the city's long-term growth, environmental, and public health goals.

The plan will recommend policies, infrastructure and programs needed to achieve Brampton's vision of a transportation system that is a mosaic of safe, integrated transportation choices and new modes contributing to civic sustainability with an emphasis on walking, cycling, and transit.

Among its guiding principles, Brampton Mobility Plan includes enhancing mobility and travel options for people and goods, advancing equity within the transportation system, improving the environmental sustainability of the transportation system, protecting and enhancing public health and safety, and leveraging emerging transportation technologies.

By 2051, Brampton is expected to grow by 430,000 people (+66%) and 200,000 jobs (+88%). As a result of this growth, future travel demand is expected to grow by 185,000 trips (+62%) by all modes in the morning peak period. Today, most trips in Brampton are made by car. If current trends continue, by 2051 an additional 150,000 car trips will be made in the morning peak period.

As Brampton continues to grow, more emphasis needs to be placed on sustainable modes of travel. If we achieve the mode share targets of Brampton Plan, we can reduce future car travel by nearly 70,000 trips. The Mobility Plan, aligned with Brampton Plan's growth management strategies, encourages a compact, transit-oriented urban form that prioritizes active and public transit over car dependency. The ability to reallocate traffic lanes for bike infrastructure is essential for supporting high-density areas where car-focused infrastructure is inefficient and unsustainable.

The City's policies on multi-modal mobility support a transportation system where cycling, walking, and transit are seamlessly connected. Bike lanes play a pivotal role in offering Brampton residents viable options beyond car use. Constraints on bike lane development would reduce transportation choice and flexibility, forcing continued reliance on private motor vehicles and hindering Brampton's efforts to

efficiently use limited road space towards an integrated, multi-modal network as envisioned in the Mobility Plan.

Brampton's Active Transportation Master Plan

The City of Brampton's Active Transportation Master Plan provides the network plan, policies and programs to support Brampton's 2040 Vision for a mosaic of safe, integrated transportation choices and new modes, contributions to civic sustainability, and emphasizing walking, cycling, and transit. Active transportation (walking, cycling and other self-propelled mobility options) presents one of the greatest untapped opportunities for reducing single occupant vehicle trips, and for addressing a host of community design and public health issues.

The Active Transportation Master Plan focuses on the implementation strategy for building a connected cycling and pedestrian network across the City (and connecting to neighbouring municipalities) to enable safer, more convenient travel by non-motorized modes, and to encourage cycling as a viable means of transportation for both recreational and utilitarian purposes for the general public.

Brampton's ATMP prioritizes expanding and enhancing cycling infrastructure to make biking a viable, safe, and appealing mode of travel for all residents. To meet this goal, the plan relies on the strategic addition of bike lanes, including in areas where reallocating car lanes is necessary to create dedicated, continuous routes.

Restrictions on Brampton's ability to create these critical corridors, especially in high-demand urban areas where road space is limited could compromise our network's future. This would lead to a fragmented cycling network that fails to provide safe, direct routes and discourages residents from considering cycling as a practical travel option, countering the plan's goal of normalizing active transportation.

Brampton Grow Green Environmental Master Plan

In 2019, Brampton Council declared a climate emergency and the need for a more sustainable transportation system given that 59% of Brampton's greenhouse gas emissions originates directly from the transportation sector. Brampton's Environmental Master Plan and Sustainable Community Development Guidelines emphasize reducing greenhouse gas emissions by decreasing vehicle dependency. Bike lanes are critical in promoting alternative modes of transportation that reduce emissions.

The City is also developing its first Climate Change Adaptation Plan to help reduce our vulnerabilities to climate change through a series of recommended actions that will improve our resiliency and ensure communities are prepared for future impacts. Restricting the methods by which the City is able to implement bike lanes could pose a significant barrier to achieving this by limiting the development of active transportation infrastructure and incentivizing car use, which would deter Brampton's progress toward emissions reduction targets by limiting low-emission options and climate-resilient transportation solutions.

Brampton Complete Streets Guide

The goal of a Complete Streets approach is to create roadways that are inclusive and promote equitable use, whether people are walking, cycling, driving, or using public transit. This design philosophy is especially focused on making streets safe for vulnerable users, including children, older adults, and people with disabilities. The Brampton Complete Streets Guide is a planning and design resource that provides the guidelines for designing streets to be safe, accessible, and accommodating for all types of users. The Guide currently informs all our road designs exercises and will further serve as the basis to our Engineering and Design Standards review moving forward.

Some key elements present in this approach include designing streets that support diverse transportation modes—walking, biking, driving, public transit, and other emerging forms of mobility, like scooters, and elements such as protected bike lanes, wider sidewalks, pedestrian crossings, and traffic calming measures to enhance safety and reduce the risk of collisions. Emphasis on creating barrier-free environments that accommodate people of all ages and abilities and guidance on adapting street cross sections based on context, such as the surrounding land use, density, and traffic volumes; are also part of the Complete Streets lens that Brampton currently adopts.

The benefits of the Complete Streets approach involve improved safety by reducing collisions and fatalities through a safer environment for pedestrians, cyclists, and drivers, increased mobility options, and promotion of sustainability and public health. It is important to consider all solutions available when developing this type of supportive infrastructure, including traffic lane reallocation, potentially increasing opportunities that encourage active lifestyles, safety and traffic congestion reduction.

Vision Zero

The Region of Peel's Vision Zero Road Safety Strategic Plan aims to eliminate traffic-related fatalities and serious injuries on roads by promoting safer, more accessible streets for all users. Rooted in the "Vision Zero" philosophy—no loss of life is acceptable—the strategy focuses on engineering, education, enforcement, and evaluation to create a safer transportation environment across the Region.

Brampton's Council passed a resolution in 2019 to adopt the Vision Zero road safety framework in how streets are designed and operated. Current initiatives to improve safety for pedestrians, cyclists and motorists on Brampton's roadways, sidewalks and walkways include automated speed enforcement, schools safety programs, community safety zones and traffic calming measures, which incorporate bike lane implementation as a way of reducing traffic lane widths to discourage speeding, in addition to provide a safer designated space for cyclists. The ability to implement bike lanes that could require traffic lane reductions can allow safe active transportation options, ultimately improving the safety of vulnerable road users.

E-scooter Pilot Program

The City of Brampton recognizes the importance of embracing innovative transportation options that expand mobility, promote sustainability, and align with our long-term strategic vision of build more connected communities and provide more sustainable transportation options for everyone. Since the

beginning of the Province's pilot project in 2020, we have observed how e-scooters can serve as a convenient, eco-friendly solution to first and last-mile travel.

Brampton's Shared E-scooter Pilot Program, the first launched in the GTA, aims to test and integrate e-scooters into public spaces, and is closely related to bike lane infrastructure, as bike lanes offer safe, designated spaces for e-scooters to operate. Since e-scooters and bicycles travel at similar speeds, bike lanes provide an ideal path for both modes, reducing conflicts with pedestrians and cars. Integrating e-scooters into bike lanes also promotes multimodal options, as shared infrastructure can support both bikes and e-scooters.

In Brampton, the shared program has reached around 350,000 trips with 40% of users reporting using e-scooters mostly to connect to public transit. Advancing and improving our active transportation network with the implementation of bike lanes that provide a safe and direct connection to destinations, but also to transit stops and terminals is fundamental to achieve the multi-modality of our transportation system.

The Pilot Program, we understand, has benefited from our existing bike lane network as the data shows bike lanes as the preferred routes by e-scooter users. The initiative, in our view, encourages municipalities to enhance their bike lane networks to accommodate various micromobility options, improving accessibility and safety for diverse users, including on roads where bike lanes were the result of repurposed traffic lanes.

Social and Economic Development and Urban Vitality

All of Brampton's policies, envision a future where active transportation infrastructure supports economic growth and urban vibrancy. A robust network of bike lanes can attract businesses, increase foot traffic, and create dynamic, people-focused spaces that boost local commerce. Cities that prioritize bike-friendly infrastructure often see local economic benefits, as the use of active transportation is correlated with communities that are more attractive for businesses, residents, and visitors alike.

Bike lanes contribute to equity by making streets safer and more accessible for everyone, particularly lower-income individuals who may rely on bicycles for affordable transportation. They help reduce transportation costs, improve access to jobs, schools, and essential services, and promote health by encouraging physical activity. In areas with bike infrastructure, the reduced reliance on cars also means less pollution and improved air quality, which often benefits underserved communities facing higher pollution levels. Inclusive bike lanes, accessible to diverse riders of all ages and abilities, help create more equitable and connected communities.

Bike lane expansion, especially in urban areas where lane reallocations may be necessary, increases Brampton's ability to create business-friendly, bike-accessible districts, increasing the potential for economic activity and urban vitality that is central to economically resilient communities. The focus on promoting mobility equity favouring all road users (estimates are that 30% of people don't have access to driving due to age, ability, or access) should include the implementation of bike lanes that provide opportunities for those who still need reliable and safe options to travel across our communities.

Alignment with Provincial Goals

The 2024 PPS highlights the importance of integrating active transportation systems to reduce emissions, alleviate congestion, and support compact, efficient growth. Our policies—such as the Brampton Plan, the Brampton Mobility Plan, and the Active Transportation Master Plan—are designed to foster these very principles. Through these frameworks, Brampton is working to transition from a car-dependent city to a dynamic, transit-oriented urban center, supported by a safe and accessible network of active transportation options.

Brampton's strategic plans prioritize active transportation as a viable and attractive alternative to car travel. Our policies focus on creating complete streets that accommodate all users and integrating cycling infrastructure with public transit to improve first- and last-mile connectivity. Initiatives like Vision Zero and the E-scooter Pilot Program further illustrate our commitment to fostering a safer, more inclusive transportation system for all road users.

It is important to note that reallocating traffic lanes to support active transportation infrastructure is a critical tool for achieving these outcomes, especially in high-density areas where road space must be used efficiently. Limiting this ability could challenge municipalities like Brampton in meeting both local and provincial transportation and climate goals.

Supporting Evidence-Based Policy

The City of Brampton has implemented approximately 26 km of bicycle lanes through “road diets” – reallocation of vehicular traffic lanes – on over-designed four-lane collector roads. These roads, often underutilized, were redesigned to reduce excessive capacity, calm traffic, and improve safety for all users. Road diets in Brampton have successfully decreased vehicle speeds, traffic volumes, and collisions, while redirecting non-local traffic to more appropriate routes.

Appendix 1 provides a detailed breakdown of the traffic metrics collected from five key corridors in the City and show reductions in travel time and operating speed, ranging from 5% to 31% and 7% to 23% respectively, indicating improved traffic operation conditions and enhanced safety. In addition, cycling numbers have been increasing year by year and the utilization of our bike lanes have also been popular with micromobility users with around 17% of total e-scooter rides from our program taking place on these corridors’ bike lanes and 60% of them starting or ending within 500 metres of the same corridors in the last year.

Also shown in Appendix 2, data from our E-scooter Pilot Program reveal that these corridors are among the most travelled routes used by riders in the City with over 17% of all trips taking place specifically on these bike lanes and around 60% of total rides starting or ending within 500 metres of the same corridors.

These results demonstrate Brampton’s commitment to creating safer, multi-modal streets that balance the needs of all road users, consistent with provincial goals. Investments in bike lanes, particularly those involving reallocation of road space, have been shown to enhance safety, improve connectivity, and support reduced reliance on single-occupancy vehicles.

Brampton's efforts are supported by robust data and research, which show that investments in active transportation reduce congestion and emissions while promoting healthier, more vibrant communities. Our initiatives align with the evidence-based strategy outlined in the proposed framework of Bill 212, while including the promotion of mobility equity and sustainable urban development. We are confident that any additional plans Brampton has of implementing bike lanes that would involve the reallocation of traffic lanes will continue to follow an evidence-based approach and meet the requirements for traffic flow reporting under Bill 212.

Collaboration for a Sustainable Future

The City of Brampton believes that municipalities are well positioned to design and implement transportation solutions that meet local needs and align with both, local and provincial priorities. We encourage ongoing collaboration with the Ministry of Transportation to ensure that the framework of Bill 212 supports best practice and innovation while addressing gridlock.

Although the Ministry did not present any data to support the assertion that bike lanes contribute to congestion and gridlock, we would like to reiterate that all our active transportation projects have always been supported by both research and practice evidence and that monitoring and evaluation are a continuous part of our process.

In summary, Brampton is ready to keep following the 2024 Provincial Policy Statement's priorities for active transportation, transit integration, and environmentally sustainable growth through its local policies and initiatives while supporting a balanced evidence-based approach to develop its cycling network towards reducing gridlock and advancing essential urban planning and environmental goals.

Finally, the City of Brampton believes that the authority and autonomy of municipalities in designing and implementing infrastructure under its jurisdiction is the best way to address local priorities and avoid unnecessary bureaucracy over the decision-making process.

We appreciate your consideration of these comments and value our ongoing partnership in advancing sustainable transportation options in Ontario. We look forward to collaborating with MTO in ensuring that the implementation of bike lanes is supported by an evidence-based approach that follows the state of the art and practice in fostering a safe and sustainable mobility system for all road users.

Sincerely,

A handwritten signature in cursive script that reads "Fernanda Soares".

Fernanda Soares, PhD

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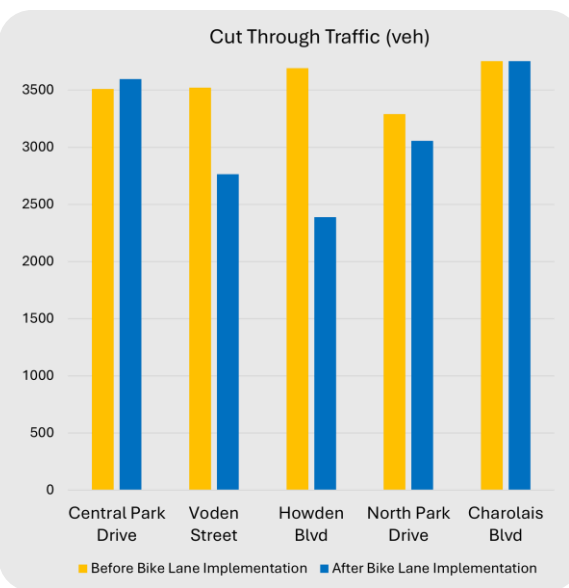
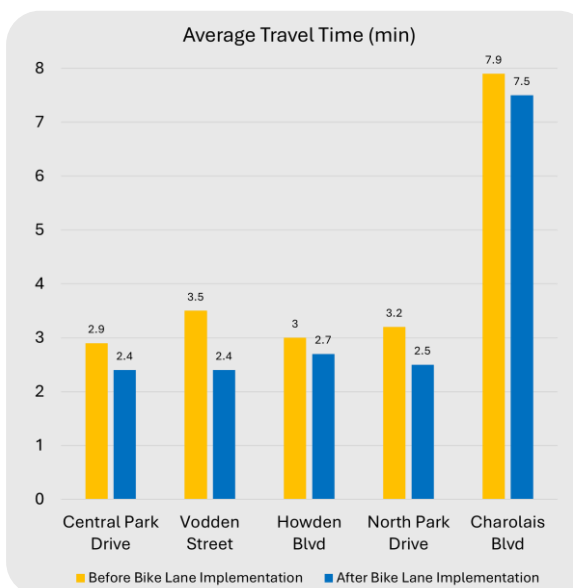
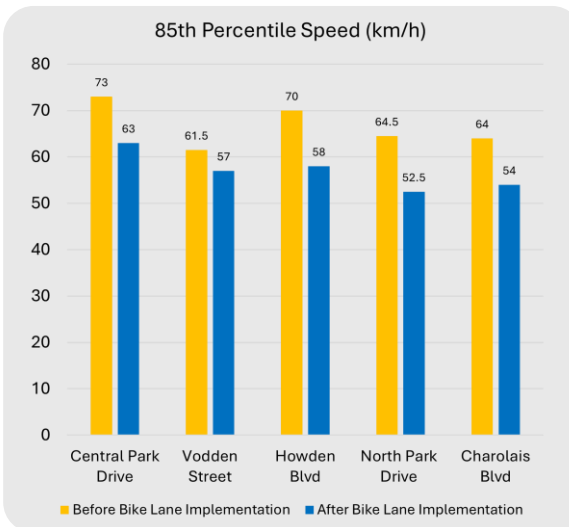
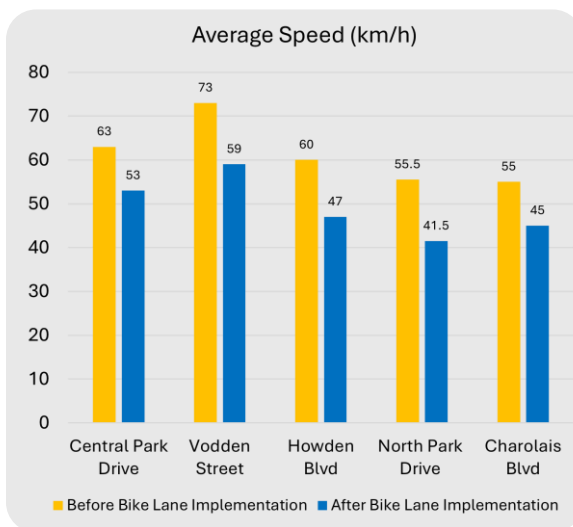
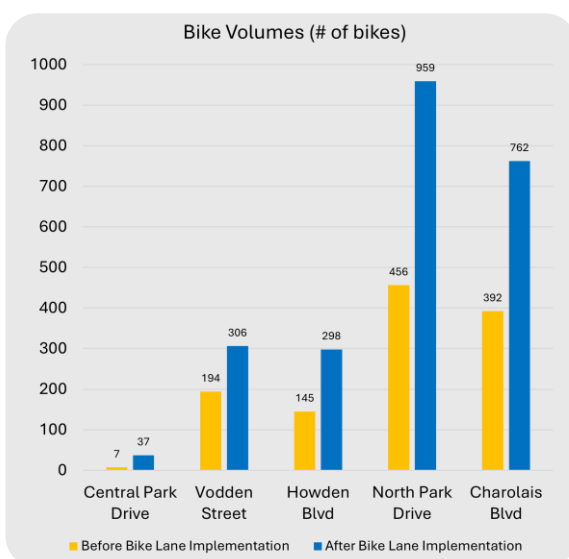
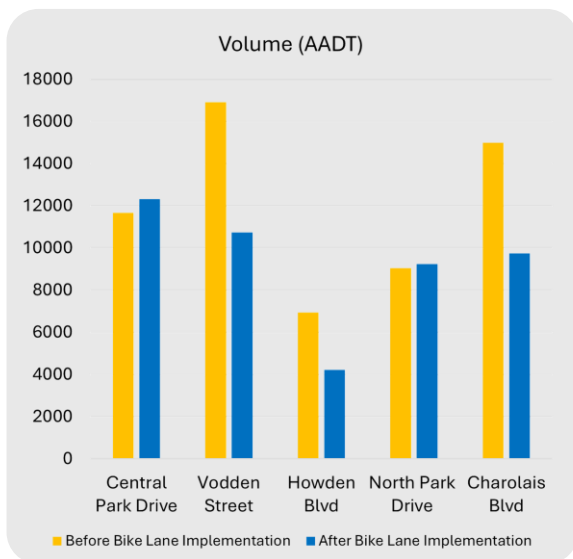
Appendix 1: Before and after data comparison of active transportation projects implemented through lane reallocation

Roads	Average Travel Time (min) **		% change		Volume (AADT)		% change		Average Speed (km/h)		% change		85th Percentile Speed (km/h)		% change		Cut Through Traffic **		% change		Bike Volume (ADT) **		% change	
	Before	After			Before	After			Before	After			Before	After			Before	After			Before	After		
Central Park Dr (2019)	2.9	2.4	-17%		11,662	12,319	6%		63	53	-16%		73	63	-16%		3,510	3,595	2%		7	37	429%	
Vodden St (2020)	3.5	2.4	-31%		16,911	10,728	-37%		73	59	-19%		61	57	-7%		3,520	2,764	-21%		194	306	58%	
Howden Blvd (2020)	3	2.7	-10%		6,936	4,221	-39%		60	47	-22%		70	58	-21%		3,692	2,387	-35%		145	298	106%	
North Park Dr (2020)	3.2	2.5	-22%		9,045	9,226	2%		55	41	-25%		64	52	-23%		3,288	3,054	-7%		456	959	110%	
Charolais Blvd (2021)	7.9	7.5	-5%		14,990	9,737	-35%		55	45	-18%		64	54	-19%		4,368	3,928	-10%		392	762	94%	

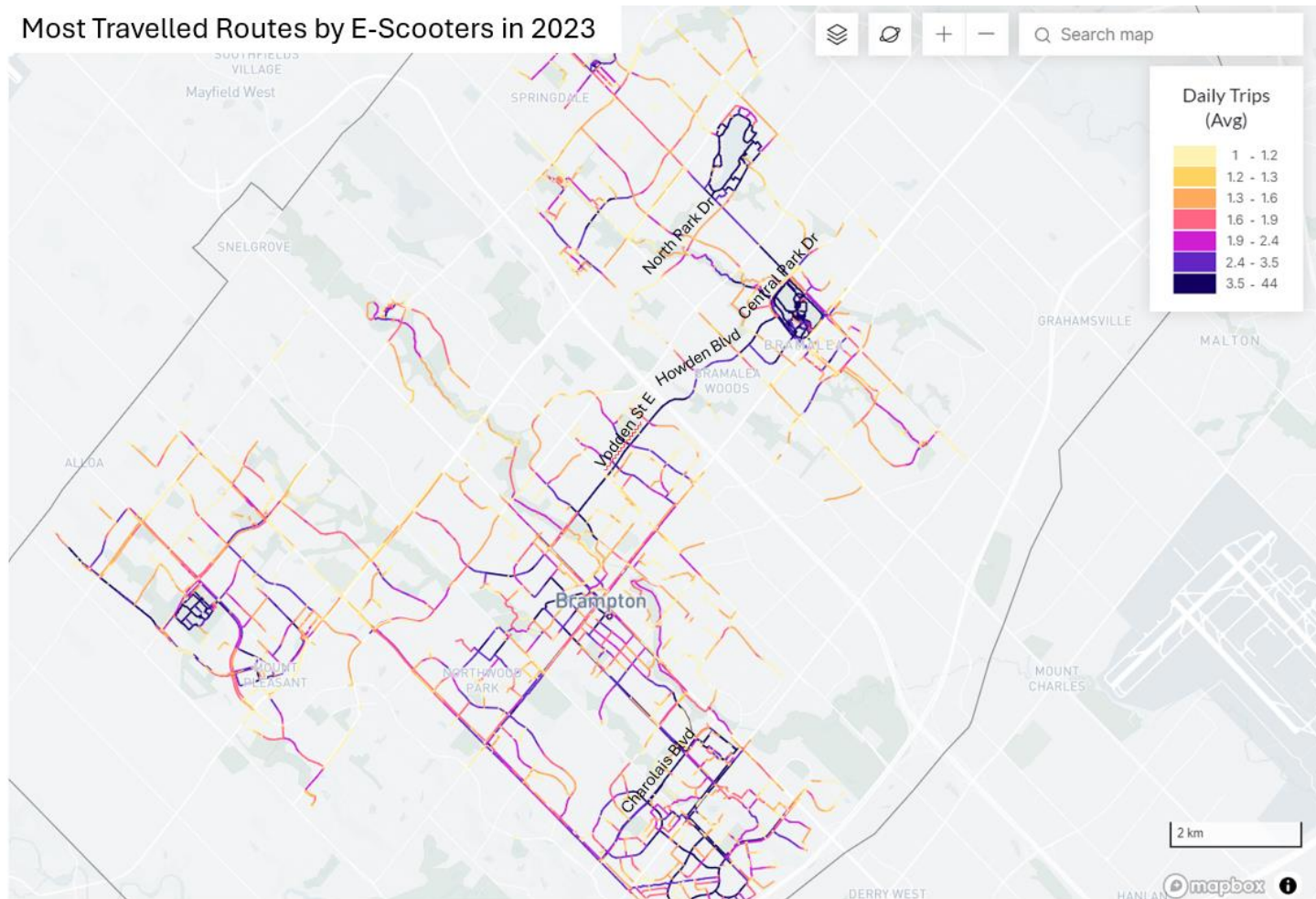
**Source: StreetLight Data (big data from mobile devices to measure travel patterns of vehicles, bicycles and pedestrians (origin and destination, travel time, speed, etc.) Before data was collected before March 2020 (when the pandemic hit). After data is from 2021-2022.

Data collected before implementation of ASE cameras.

Cut through traffic is defined as the traffic passing through a residential area without stopping or without an origin or destination within the area (utilizing a "local residential street" rather than streets which primary function is to accommodate through traffic)



Appendix 2: E-scooter Pilot program heat map – most travelled routes in 2023.



In the second season of the E-scooter Pilot (2024), operators reported:

- Over 10,000 trips (17% of total rides) took place on the following roads with bike lanes: Central Park Drive, Voddan Street E, Howden Boulevard, North Park Drive, Charolais Boulevard;
- 28,061 trips (60% of total rides) started or ended within 500 metres of the same corridors.