

November 20, 2025

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**Re: Bill 60 - Fighting Delays, Building Faster Act, 2025 - Modern Transportation - Prohibiting Vehicle Lane Reduction for New Bicycle (ERO 025-1071 and ORR 25-MT019)**

We thank the Ministry of Transportation (MTO) for the opportunity to comment on amendments to the Highway Traffic Act regarding bike lanes in Bill 60, *Fighting Delays, Building Faster Act 2025*. Creating communities for life is a priority for Peel Region, and this includes providing safe, convenient, and equitable options for people to get around within their community.

While Peel Region shares the Ministry's belief in the importance of finding solutions to tackle traffic gridlock, there are a number of challenges with the proposed changes to bike lanes in Bill 60, including the framework not aligning to or supporting Peel Region's various transportation plans and strategies and the lack of clarity with a few provisions. In addition to these issues, Peel Region wishes to highlight the social, health, and environmental benefits of bike lanes. These comments build upon previously submitted feedback as part of the consultation process for Bill 212, Reducing Gridlock, Saving You Time Act 2024.

Specific comments on the proposed legislation regarding these issues and benefits are outlined below.

**PEEL REGION SPECIFIC COMMENTS**

**Bike Lane Framework Not Aligned with Peel Region's Transportation Plans & Strategies**

Peel's transportation plans and strategies are being updated to align with the 2024 Provincial Planning Statement, which is supportive of using bike lanes. The Province's changes to bike lanes are not aligned with and may impact Peel Region's ability to achieve the goals and vision set out in its various transportation plans and strategies. These impacts are highlighted below:

- Peel's Long Range Transportation Plan supports providing residents and commuters with a variety of travel options, including bike lanes, that support community connections, enhance public health, air quality, and mitigate climate change. The proposed legislation limits Peel's ability to plan for and achieve this vision, including reaching our climate change goals.

- In planning for complete roads that support multiple modes of transportation, removing bike lanes poses serious safety risks. Peel Region's Vision Zero road safety plan prioritizes safety over other factors such as cost, speed, delay, level of service, and convenience, as no loss of life is acceptable due to a motor vehicle collision. Any restriction on bike lanes may interfere with Peel's ability to achieve the outcomes of Vision Zero and put cyclists at unnecessary risk.
- The Region's Sustainable Transportation Strategy aims to achieve a 50% sustainable mode share by 2041. One of the actions for achieving this goal is to encourage and support cycling to and from schools, transit hubs, and other community destinations. Bike lanes are an important part of making trips such as these, as well as connecting trips to and from transit, known as the first and last mile. The bike lane amendments in Bill 60 could impact local municipal and Regional planned cycling networks, that are central to achieving Peel Region's 50% sustainable mode share goal alongside other modes of active transportation as well as public transit.

### **Some Bike Lane Framework Provisions Require Greater Clarity**

Peel Region requests further clarification on certain provisions in the Province's proposed changes to bike lanes, as they could affect existing bike lanes or planned bike lanes as well as apply to multi-use paths. Greater clarity and more information are needed to determine financial, social and property impacts. The provisions and matters in question are outlined below:

- In the previous provision for the supply of municipal data and Ministry review of existing bike lanes created by converting or removing any traffic lanes under Bill 212, no timeline was given regarding how far back the Ministry would review existing bicycle lanes on municipal roads. Bill 60 does not provide clarification regarding the retroactive review of existing bike lane infrastructure. If these bike lanes are reverted to traffic lanes, there could be major implications in terms of the function, conversion, and connectivity of Peel's transportation infrastructure, including financial, social or property impacts.
- The proposed legislation is unclear whether it applies to dedicated bicycle lanes only or any type of cycling infrastructure, such as multi-use paths, which provides accessible and equitable travel options for all users including cyclists, pedestrians, and wheelchair users. If the legislation includes multi-use paths and cycling infrastructure that could be discontinued at highway crossings, this could affect Peel's Active Transportation Strategy. Additionally, it may pose challenges in terms of time and resources needed for the Ministry's approval process.
- Bill 212 suggested that Regional and municipal roads with existing or planned bicycle lanes impacted by Highways may be considered for removal. While Bill 60 does provide clarity around planned bike lanes insofar as they would be prohibited were they to remove a lane of vehicular traffic, the proposed changes do not speak to existing infrastructure. This

would significantly impact Peel Region's planned cycling network and cause disconnections and separation between communities.

- Further, Peel Region is concerned that this provision could limit design alternatives for a future road widening or reconstruction project, as conversion from a general-purpose lane to a bicycle lane could be evaluated as a feasible alternative in a corridor study. This could also result in increased land acquisition requirements, increasing the overall cost of a capital project.
- As Regional Roads are typically major arterial roadways and support heavy truck traffic, bicycle lanes are often screened out for on-boulevard facilities. In rural areas where roads are not urbanized, Peel provides a wider paved shoulder which functions as an "accessible shoulder", which serves as joint use for pedestrians and cyclists. The Region is unclear as to whether these accessible shoulders would be impacted by the proposed legislation.

### **The Benefits of Bike Lanes**

The installation of bike lanes on municipal road has several financial, health and environmental benefits, which are detailed below:

- Bicycle lanes can increase safe access to low-cost mobility for lower income populations, provide first- and last-mile connections to support public transit use as previously mentioned, and expand access to employment opportunities. The language in Bill 60 suggests the prioritization of vehicles over other types of travel, including active transportation, which may further marginalize those who rely on active transportation as a primary method of transportation (particularly among transportation-disadvantaged groups such as seniors, youth, and low-income residents, for example). Peel Region advocates for equitable travel options for those who cannot afford to drive, or where transit is not available, such as in many rural areas within the Region.
- Further, the provisions in Bill 60 place both cyclists' and vehicle drivers' safety at risk, as it would encourage biking on the road without dedicated lanes. The risk to pedestrian safety would also be increased, as biking on the sidewalk would be more likely to occur. Dedicated bike lanes are an effective way to keep all road users safe, and ultimately, save lives.
- Peel Region continues to advocate for a modal split that promotes the benefits of active transportation, which include financial, health, and environmental benefits including the reduction of greenhouse gas emissions.
- The Financial Accountability Office of Ontario recently reported that as climate change continues to be present in Ontario communities, the cost of maintaining road network infrastructure will escalate. Peel Region advocates for fiscal prudence on behalf of residents and taxpayers, including exploring and allowing for less costly alternative transportation infrastructure such as bicycle lanes.

- Furthermore, shifting travel behaviours away from single-occupancy vehicle travel and towards more active/sustainable travel modes can not only improve traffic congestion but improve local air quality and reduce greenhouse gas emissions.
- The proposed legislation may have negative impacts on health outcomes among Peel residents by creating barriers to building healthy, complete communities with safe, connected multimodal infrastructure. Evidence demonstrates that bicycle lanes enable active living, advance health equity, address the health-related impacts of climate change, and improve road safety. It also shows that encouraging active transportation by providing safe, comfortable, and connected walking and cycling infrastructure is a proven way for residents to incorporate physical activity into their day, thereby lowering the risk of chronic diseases associated with inactivity and improving mental wellbeing.

## Conclusion

Peel Region has identified a number of issues for consideration regarding the changes to bike lanes proposed in Bill 60. The proposed bike lane framework is not aligned with the Region's various transportation plans and strategies and may limit its ability to improve road safety, provide residents more travel options and achieve a 50% modal split. There are also certain components of the proposed bike framework that need to be clarified in order for Peel Region to properly determine any financial, social and infrastructure impacts. Finally, we highlighted some of the financial, health and environmental benefits of installing and expanding bike infrastructure networks.

Your consideration of our comments is greatly appreciated. If you have questions or require additional information, please contact me at [miriam.polga@peelregion.ca](mailto:miriam.polga@peelregion.ca).

Kind regards,

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