

## Bill 60 ERO 025-1071 Submission

### Executive Summary

Ontario's communities and economy thrive when infrastructure and transit growth balances safety, climate action, and ecosystem protection. Bill 60 must ensure Vision Zero, public transit, and natural carbon sinks are safeguarded to protect both people and our climate goals.

I support infrastructure and transit development in Ontario that strengthens the economy while protecting public safety, community well-being, and the environment. Bill 60 proposes amendments that risk weakening environmental and climate safeguards, limiting municipal and public oversight, and reducing accountability.

Key concerns include:

- Restrictions on active transportation, bus lanes, and speed cameras, undermining Vision Zero (municipal frameworks) and road safety.
- Highway expansion that worsens congestion and emissions through induced demand, rather than prioritizing sustainable transit.
- Transfers and consolidation of water and wastewater responsibilities that may reduce climate-resilient management.
- Reduced alignment of planning approvals with climate, biodiversity, and watershed protections.

Natural ecosystems are critical carbon sinks and provide essential services. Canada's wetlands deliver an estimated \$225 billion per year in ecosystem services, while Ontario's forests, freshwater systems, and biodiversity contribute roughly \$50 billion per year, supporting carbon storage, water purification, flood control, and biodiversity. To meet climate emission goals, these ecosystems and their value must not be eroded.

The accompanying document provides detailed analysis of each schedule, evidence-based recommendations, and supporting sources to guide decisions that balance economic growth, climate action, and community safety.

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**Ontario's communities thrive when infrastructure, development, and transportation decisions balance economic growth, environmental protection, and community well-being. Protecting natural ecosystems is crucial for sustaining our economy, climate, and the well-being of current and future generations.**

**Bill 60 aims to accelerate infrastructure delivery, yet the amendments highlighted below risk weakening environmental and climate safeguards, reducing municipal and public oversight, and limiting accountability, threatening both the economy and community resilience.**

### **Schedule 1 – Building Transit Faster Act, 2020**

Fast transit boosts local economies and jobs, but must not sacrifice environmental review that ensures long-term community resilience.

#### **Changes of Concern:**

- Reduces notice periods for construction, operation, and maintenance from 30 days to 15 days.
- Allows the Minister to delegate key functions broadly.

#### **Concern:**

- Accelerated timelines reduce municipal and public ability to review environmental or climate impacts of transit projects.
- Broader authority to alter municipal infrastructure without full consultation risks unanticipated environmental effects, including impacts on flood control, stormwater management, and natural heritage corridors.

#### **What is needed:**

- Requirement for climate or environmental impact assessments prior to exercising expanded powers.
- Transparency measures or mechanisms for meaningful public input.

### **Schedule 3 – Development Charges Act, 1997**

Development fees fund growth, yet shortcuts in planning risk climate-resilient infrastructure and long-term economic stability.

#### **Changes of Concern:**

- Alters rules on spending reserve funds and local service policies.

#### **Concern:**

- Funding decisions for services tied to development charges could prioritize speed and cost over climate-resilient infrastructure and sustainable land-use planning.

**What is needed:**

- Clear guidance on ensuring development charges are applied to climate mitigation measures, green infrastructure, or natural heritage protection.
- Public transparency mechanisms beyond ministerial review.

**Schedule 5 – Highway Traffic Act**

More highways may ease short-term traffic but worsen pollution and congestion; public transit and active transportation are key to sustainable economic and community well-being.

**Changes of Concern:**

- Prohibits municipalities from reducing motor-vehicle lanes when installing bicycle lanes (or “any other prescribed purpose”).
- Allows the Minister or regulations to restrict municipal authority over speed cameras and other traffic-calming measures.

**Concern:**

- Limits municipalities’ ability to implement effective transportation and safety solutions, assuming motor-vehicle travel is always the priority.
- Restricting lane reductions may block protected bicycle or bus lanes, slowing progress on emissions reduction and transit goals.
- Limiting municipal control of speed cameras undermines public safety. Many Ontario municipalities have adopted **Vision Zero**, a framework to eliminate road deaths and serious injuries; it emphasizes safe design, speed management, and equitable mobility, supporting climate resilience and public health.

**What is needed:**

- Explicit provisions ensuring active-transportation infrastructure and Vision Zero tools (e.g., speed cameras) are maintained or expanded.
- Criteria for reconciling lane-reduction or traffic-calming restrictions with climate, equity, safety, and modal-shift objectives.
- Municipal autonomy to assess local context and public consultation requirements for any exemptions or regulations.

**Schedule 7 – Municipal Act, 2001**

Transferring water responsibilities can improve efficiency, but safeguards are essential to protect infrastructure, public health, and economic resilience.

**Changes of Concern:**

- Transfers jurisdiction over water and sewage utilities in Peel to local municipalities.

**Concern:**

- Rapid transfer may disrupt water management systems and long-term planning critical for climate resilience.
- Smaller municipalities may lack capacity or resources, compromising effective water and sewage infrastructure management.

**What is needed:**

- Safeguards ensuring continuity of water quality, infrastructure maintenance, and climate-adaptive planning.
- Ensure guardrails in ERO 025-1060 and ERO 025-1104.

**Schedule 8 – Ontario Water Resources Act**

Expanding sewage powers may support agriculture, but water quality risks threaten communities and long-term economic sustainability.

**Changes of Concern:**

- Expands Section 53 to agricultural lots with multiple sewage works above certain capacities.

**Concern:**

- Increased output risks surface and groundwater quality; cumulative watershed effects may be underestimated.

**What is needed:**

- Environmental assessments, regular monitoring, and public reporting.
- Integration with source water protection plans and climate resilience measures, including revisions to ERO 025-1060 and 025-1104.

**Schedule 10 – Planning Act**

Faster planning approvals can speed growth, but weakening environmental standards reduces livability and long-term economic benefits.

**Changes of Concern:**

- Reduces requirement for ministerial decisions to align with policy statements (except Greenbelt areas).
- Changes rules on community improvement project areas and municipal authority over planning agreements.

**Concern:**

- Weakens alignment with provincial land-use policies including climate, biodiversity, and environmental protection
- Delegation and ministerial discretion can bypass local consultation and scientific review.

**What is needed:**

- Environmental review and community input when standards are reduced.
- Ensure development is climate-resilient, energy-efficient, and protects watersheds and habitats.

**Schedule 11 – Public Transportation and Highway Improvement Act**

More highways increase congestion and emissions; investing in transit infrastructure strengthens the economy and public safety.

**Changes of Concern:**

- Removes legal challenge for certain highway works.
- Allows Ministerial regulation overriding planning, design, construction, maintenance, and operation standards for highways and bridges.

**Concern:**

- Reduced legal recourse undermines accountability for environmental impacts.
- Regulatory discretion may permit projects that increase emissions or degrade habitats.

**What is needed:**

- Climate impact assessments, habitat protection, and GHG reduction measures.
- Public reporting of design, construction, and mitigation efforts.

**Schedule 15 – Transit-Oriented Communities Act, 2020**

Transit-oriented development drives opportunity, but must align with climate-smart urban design and community well-being.

**Changes of Concern:**

- Ministers may require agreements with landowners and collect municipal information.

**Concern:**

- Centralized control can bypass local planning and environmental review.
- Agreements may prioritize speed over climate-smart design, energy efficiency, and ecosystem protection.

**What is needed:**

- Explicit obligations for climate-aligned urban design, green infrastructure, and emissions reduction.
- Public consultation and transparency in agreements and information collection.

**Schedule 16 – Water and Wastewater Public Corporations Act, 2025**

Consolidating water services can improve efficiency, but centralizing authority without climate-adaptive planning risks health and economic stability.

**Changes of Concern:**

- Ministers can designate corporations for water/wastewater services and regulate rates, governance, and operations.
- Extinguishes certain legal causes of action.

**Concern:**

- Concentration of power may reduce accountability and oversight over water quality and infrastructure resilience.
- Risk of misalignment with climate-adaptive water management, source protection, and long-term sustainability.

**What is needed:**

- Mandatory climate risk assessments, transparent rate-setting aligned with sustainable water management, and public reporting.
- Transparency in ministerial decision-making that overrides effective local selection and oversight.

**Evidence Summary**

Research shows that municipal control over active transportation, transit infrastructure, and traffic enforcement directly supports public safety, climate goals, and economic resilience:

- **Active Transportation:** Protected bike lanes and bus lanes reduce injuries, increase transit use, and support low-emission commuting.
- **Traffic Safety:** Speed cameras and traffic-calming measures reduce fatalities and severe injuries, supporting **Vision Zero**.
- **Transit vs. Highway Expansion:** Studies on **induced demand** show that building more highways increases travel, congestion, and emissions. Investment in transit and active mobility is more effective for mobility, emissions reduction, and economic growth.
- **Natural Capital:** Canada's wetlands provide an estimated \$225 billion per year in ecosystem services. Within Ontario, forests, freshwater, and biodiversity contribute roughly **\$50 billion per year**, supporting carbon storage, water purification, flood control, and biodiversity. Protecting these ecosystems is essential for economic resilience, public well-being, and meeting climate emission goals.

## Conclusion

I support the growth of clean, community-oriented public transit and sustainable development in Ontario. Bill 60 seeks to accelerate infrastructure delivery, yet the amendments highlighted above weaken environmental and climate safeguards, limit municipal and public oversight, and reduce accountability and transparency. In order to do better for Ontarians, I respectfully request that the government revisit the bill and:

- Reinstatement of environmental and climate impact assessments for projects affected by these schedules.
- Embed explicit protections for climate, biodiversity, water systems, and natural resources in development, transit, and water management.
- Ensure meaningful public consultation and transparency to guide decisions that balance long-term economic growth, climate action, and community safety.

## Key Supporting Sources

### 1. Active Transportation & Public Safety

- Cochrane Collaboration (2020). "Speed cameras for the prevention of road traffic injuries and deaths."
- City of Toronto – Automated Speed Enforcement Program Data (2023).
- Route Infrastructure and the Risk of Injuries to Bicyclists: Case-Crossover Study (Toronto & Vancouver).
- Institute for Transportation & Development Policy – Cycling infrastructure benefits.

- Cycling Infrastructure Study, Montréal (2025).
- Statistics Canada – Can-BICS.

## **2. Highway Expansion, Induced Demand & Emissions**

- Duranton & Turner (2011), “The Fundamental Law of Road Congestion.”
- Transport Canada, “Cost of Urban Traffic Congestion in Canada.”
- IPCC and transport sector studies.

## **3. Natural Capital & Economic Value**

- CPAWS. Canada-wide wetlands: ~\$225 billion/year.
- Ontario Biodiversity Council. Ontario ecosystems: ~\$50 billion/year.