

November 21, 2025

**Submitted online and via email to [mto.ero@ontario.ca](mailto:mto.ero@ontario.ca)**

Ministry of Transportation  
Environmental Policy Office  
438 University Ave, 12th Floor  
Toronto, ON, M7A 1N3

**RE: Amendments to the Building Transit Faster Act, 2020**

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback on the proposed amendments to the *Building Transit Faster Act, 2020* (BTFA) as part of Schedule 1 of Bill 60 – the *Fighting Delays, Building Faster Act, 2025*. Below, you will find the City of Guelph's comments regarding the proposed amendments.

**Reducing Notice Periods for Obstruction Removal and Preview Inspections:**

Proposal summary:

The BTFA authorizes the Ministry of Transportation (the Ministry) to enter land within 30m of a provincial transit corridors to undertake inspections, or obstruction removals needed to accommodate provincial transit projects. Currently, the Ministry must provide at least 30 days notice of these activities. In the case of obstruction removals, this period provides for the landowner to negotiate conditions for the removal of an obstruction, and if an agreement is not reached within this period, the Ministry is authorized to carry out the obstruction removal under the terms of the BTFA. As part of Bill 60, the province is proposing to reduce this notice and negotiation period to 15 days.

Comments:

The City of Guelph is supportive of efforts to expediate and enhance the provision of two-way all-day GO service to Guelph via the Kitchener Line. Guelph understands that in order to do so, the Province is seeking opportunities for shorter timeframes within the BTFA and greater powers to enable necessary works to occur. Given the compressed timeline, the City anticipates several challenges, including operational and safety readiness, effective coordination with stakeholders, capital asset protection and potential failure risks, and municipal staff and financial resource constraints. To help mitigate these risks and ensure timely, high-quality service delivery, we respectfully request early and active collaboration, along with access to supporting tools such as standardized templates and other relevant resources to facilitate accelerated implementation. The City of Guelph welcomes continued collaboration and engagement with

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MTO and Metrolinx to proactively identify key stakeholders and support communications efforts within our community.

### **Expanding Municipal Service and Right of Way Access Conditions:**

#### *Proposal summary:*

The BFTA authorizes the Ministry to order that municipalities grant the Ministry access to certain municipal infrastructure where temporary closures or modifications are needed to accommodate provincial transit project construction. Schedule 1 of Bill 60 proposes to amend the BTFA to expand municipal service and right of way access conditions in the following ways:

- Currently, these access conditions only apply to municipal roads, water, and sewage works. The Ministry is proposing that these conditions also apply to buildings, bridges, tunnels, and life safety systems, as well as any other infrastructure designated through future regulation.
- Currently, these access conditions are limited to the use, access, and modification of municipal infrastructure and rights of way. This proposal would also authorize the Ministry to relocate, alter, and add connections to municipal infrastructure.
- Currently, these access conditions only apply during the construction of transit projects. This proposal would extend the application of these access conditions to the maintenance and operations of the transit project.

#### *Comments:*

City of Guelph recognizes the importance of advancing transit infrastructure efficiently and collaboratively. The proposed amendments expand provincial access to municipal services and right-of-way. Given the many stakeholders in the municipal right of way, the long-term relationships the municipality has with local utilities, services, and landowners, and the complexity of municipal infrastructure asset management, it is essential for the Province or its delegates to partner with the Municipal road authority. For example, applying online for Road Occupancy Permits (ROP) will ensure that all necessary road users – emergency services, transit, schools, the public, and public work – are properly notified to coordinate the requested work. The ROP is the most efficient existing procedure that the City has for review, notification, and record documentation of infrastructure installation and restorations when third party work is completed within the City's right-of-way.

It will be important to ensure that implementation frameworks continue to support effective coordination, public safety, and protection of existing municipal assets. Clear processes for communication and coordination will help maintain strong delivery of projects while minimizing unintended impacts on the local community.

**Closure:**

We appreciate this opportunity to provide input on this proposal. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at [intergovernmental.relations@guelph.ca](mailto:intergovernmental.relations@guelph.ca).

Sincerely,

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**City of Guelph**

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