

November 21, 2025

Submitted online and via email to mto.ero@ontario.ca

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

RE: Bill 60 - Fighting Delays, Building Faster Act, 2025 – Modern Transportation – Prohibiting Vehicle Lane Reduction for New Bicycle Lanes

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback regarding the amendments to the *Highway Traffic Act* proposed under Schedule 5 of Bill 60 – the *Fighting Delays, Building Faster Act, 2025*.

Summary of Proposed Amendments:

Following amendments made to the *Highway Traffic Act* (HTA) in 2024 through Bill 212, municipalities have been required to seek ministerial approval to construct a cycling lane which reduces the total amount of vehicular lanes available on a road. Under Bill 60, the province is proposing to further amend the HTA to prohibit the installation of cycling lanes which reduce vehicular lanes altogether, and to grant the Minister regulation-making authority to designate additional circumstances where the reduction of vehicular lanes is prohibited.

Comments:

The City of Guelph is committed to providing a safe, affordable, reliable, and healthy transportation system to the community that meets their needs today, but also supports the growing community to 2051. Our policies are aligned with the Province's goals of enabling housing, reducing gridlock and building infrastructure faster to keep our people and economy moving.

This legislative proposal directly restricts the City of Guelph's ability to deliver on our 20-year plan for transportation by significantly limiting the use of a fast, affordable and efficient option from our menu of multi-modal transportation strategies.

The City of Guelph developed a long-range [Transportation Master Plan \(TMP\)](#) founded on traffic and socio-economic data, community input, and growth planning to determine existing and future areas at risk of significant congestion. It is reflective of Guelph's unique topography, cultural heritage and financial constraints and demonstrates that widening roads for additional vehicle traffic is not feasible or affordable. Our TMP recognizes that to widen roads for growth in personal vehicle transportation is unsustainable,

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unaffordable, and impacts vast tracts of personal property.

Our data revealed that 80% of residents live and work in Guelph, and over 60% of daily one-way trips are less than 7.5 kilometers, which makes them achievable by bicycle. Guelph's TMP and Official Plan have set a realistic and achievable mode share target of 10% for trips by bike by 2051, but this requires a connected and protected network of bike facilities to make it a safe and convenient option for a larger proportion of residents. If we were to achieve this mode share today, that would represent 26,000 fewer trips by car per day off our roads.

One of our multi-pronged approaches to expanding our cycling network includes reallocating excess road capacity where the data demonstrates that the reduction can still handle the existing and projected traffic volumes. This approach saves millions of dollars in property taxes and development charges - the cost of building a protected bike lane in the existing road is approximately \$150 per meter, compared to \$4,000 per meter for a net new cycle track or multi-use path in the boulevard.

Leveraging municipal expertise and community input is essential to effectively balance traffic flow with active transportation, road safety, and broader community priorities. Cycling plays a vital role in reducing congestion, and bike lanes are a foundational component of multi-modal planning. By supporting short trips and transit connections, they help shift car trips off the road contributing to congestion relief rather than adding to it. Cycling also improves the community's physical and social health, provides a safe and reliable transportation option to residents who may not be able to drive including youth, seniors, lower-income households and those with accessibility challenges, and generates valuable tourism dollars. Ultimately, equipped with local expertise and long-term plans, such as the TMP, municipalities are in an excellent position to make local transportation that meet both local and provincial goals.

Closure:

The City of Guelph appreciates the opportunity to provide feedback, and urges the province to reconsider the blanket ban on cycling lanes which result in a reduction of vehicle lanes. A safe and well-connected cycling network ultimately helps reduce car traffic by shifting the transportation mode share towards cycling, and constructing bike lanes in existing roadways is a proven method to deliver safe infrastructure at a significantly reduced cost to taxpayers.

We would be happy to continue working with the province to address concerns around vehicular road capacity, and encourage the province to explore other less restrictive tools to achieve provincial outcomes.

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.

Sincerely,

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