

November 14, 2025

Attn: Ministry of Transportation

RE: Prohibiting Vehicle Lane Reduction for New Bicycle Lanes

Proposal number: 25-MTO019

The City of Kitchener appreciates the opportunity to comment on the proposed legislation regarding lane removal. While we support the intent to maintain roadway capacity and safety, we have significant concerns about the absence of regulated exemptions within the framework.

The proposal states that bike lanes cannot be removed and further indicates that a lane cannot be removed for any other prescribed purpose. Based on this language, lanes simply cannot be removed under any circumstance, which severely limits our ability to deliver on objectives that support transit, active transportation, and complete streets.

Our preference is to advocate for a prescribed exemption process where excess capacity exists. For example, a local street that was overbuilt with four lanes and carries fewer than 5,000 vehicles per day should not be treated the same as an arterial roadway carrying 30,000 vehicles per day with the same cross-section. Allowing exemptions in such cases would enable municipalities to repurpose space for transit priority, cycling infrastructure, or public realm improvements—objectives that align with moving Ontarians faster and more sustainably.

If exemptions are not clearly prescribed, the legislation should at minimum define a transparent exemption process so municipalities can understand how future works will be impacted. Additionally, we recommend requiring a traffic study to demonstrate that lane removal will maintain an acceptable level of service before approval.

We also seek clarity on scenarios involving full closure or repurposing of roadways that are no longer needed (e.g., redundant lanes or corridors). As currently written, the legislation appears to prohibit such actions entirely, which could prevent municipalities from optimizing their networks and achieving broader transportation goals.

Thank you for considering our feedback. We look forward to further engagement on this important matter.