

**November 14, 2025**

**Attn:** Ministry of Transportation

**RE:** Harmonization of Municipal Road Construction Standards

**ERO number:** 025-1140

### **Road Construction Standards**

The City of Kitchener appreciates the opportunity to provide input on the proposed standardization of road construction specifications. We are supportive of this initiative and see significant value in harmonizing specifications for materials such as asphalt, concrete, and granular. Standardization in these areas will help ensure consistency, quality, and efficiency across municipalities.

Kitchener has already aligned many of our specifications with OPSS for these materials and recognizes the advantages of further harmonization, particularly for asphalt. For example, Kitchener will not transition to Superpave asphalt unless other area municipalities do so collectively. This approach respects our local asphalt providers by minimizing the number of mix designs they must produce, reducing complexity and cost.

Our municipality has a long history of partnering with industry, including road builders, consultants, utility companies, and the development sector, to develop constructible road sections that accommodate increasing demands within the public right-of-way while meeting policy and operational needs. These collaborative efforts have resulted in designs that have been successfully implemented and positively received by the public.

### **Design Standards**

However, we have concerns regarding the standardization of design elements, such as a uniform cross-section. Design flexibility is critical to address local conditions and operational priorities.

While we support standardizing construction standards, we caution against rigid standardized designs. Design elements often enhance traffic safety and respond to unique environmental contexts. Some aspects, such as minimum sidewalk widths, can be standardized; however, any standard design framework should allow sufficient flexibility to deliver streetscapes that meet intended functional and aesthetic requirements.

We are also interested in understanding the transition provisions for existing road allowances and ensuring that design considerations are reflected in the Minimum Maintenance Standards (O.Reg. 239/02).