

November 21, 2025

Minister Sarkaria
Ministry of Transportation
777 Bay Street, 5th floor
Toronto, Ontario M7A 1Z8

Dear Minister Sarkaria,

Re: OPPI Feedback on ERO 025-1035: Amendments to the Building Transit Faster Act 2020

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Transportation's proposal to amendments to the *Building Transit Faster Act, 2020* (BTFA), which if passed, will help expedite transit projects in Ontario.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Service, other community agencies, and academic institutions. They work across a geographically diverse cross-section of Ontario in communities of all size and have a wide range of practice areas including but not limited to transportation planning.

This Bill contains a number of proposals. OPPI offers guidance on some, but not all of the items contained in the Bill. Our focus is on those items where professional planners are directly involved in the process.

OPPI recognizes the importance that expediting major transit projects will have on housing, economic development, and climate objectives by providing efficient and effective access to mobility choices. We acknowledge that streamlined processes can reduce uncertainty and help maintain momentum on long-term people moving projects, especially in growth corridors.

We also acknowledge that transit corridor projects are part of a long-term, multi-year implementation schedule that must be carefully coordinated with plans and agreements among partners and providers, especially in two-tier municipalities. Changes to the *BTFA* could disrupt the continuity and current momentum of corridor planning, phasing, or design that municipalities have already advanced through completed Environmental Assessments (EAs), detailed designs, and established funding/implementation frameworks, especially those that have already been completed, approved, and funded.

Fair and predictable treatment for provincial transit projects will complement rather than displace local transportation investments. Design and implementation of provincial transit projects should:

- Support safe and convenient walking and cycling access to stations.
- Reinforce local main streets and public realm objectives.
- Optimize fare and service integration to support first-and-last mile transit connectivity.
- Align with municipal Vision Zero, climate, and health-related transportation goals.
- Support local transit networks with purpose-built interchange stations.
- Enhance goods movement on the road network.
- Provide for emergency access and emergency services access.

The proposal to allow the Minister to delegate the authority to issue municipal service and right-of-way access orders to Metrolinx or MTO officials raises concerns for local input. At present, ministerial orders require consultation with municipalities. If delegated:

- There is a risk that local operational issues, community context, and municipal priorities will receive less consideration and thus generate future technical challenges and issues leading to unnecessary expenditures on retrofit or adaptation.
- There is an impact risk from the creation of effective, connected, and efficient transportation systems if there is a lack of coordination and awareness; municipalities may have reduced opportunity to shape how transit projects interface with local transit, active transportation networks, goods movement, and emergency access.

Should the ministry proceed with delegated authority, OPPI recommends that it be accompanied by clear, mandatory consultation requirements with affected municipalities and agencies, including upper and lower tiers where applicable. Additionally, there must be transparent protocols for how local comments are documented, considered, and reflected in decisions. This is especially important where provincial actions affect municipal roads, utilities, buildings, bridges, tunnels, and life-safety systems.

We encourage the Ministry to develop clear, consistent frameworks that outline responsibilities, costs, and long-term operations for projects. More specifically, municipalities need clear, consistent frameworks that outline:

- Responsibility for construction, operations, and maintenance of affected assets during and after transit project delivery, and
- How incremental municipal costs (e.g., service disruptions, detours, additional local works) will be addressed.

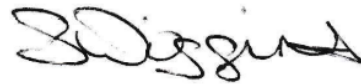
- Mechanisms for local control (particularly development and supporting infrastructure and utilities) to be returned to the municipality after delegated authority to Metrolinx. Or at least a review date after 5 or 10 years of operations.
- Opportunities, during the construction phase, for moves or alterations to better tie-in or be coordinated or considered in the development of Municipal Infrastructure Agreements to help offset the costs of disrupting or affecting current or planned infrastructure and their capital replacement life cycles.

Thank you for the opportunity to provide feedback on the ERO 025-1035. We would be pleased to meet with you to discuss our recommendations related to motor vehicle traffic lanes and bicycle lanes. If you have any questions or would like to schedule a meeting, please do not hesitate to contact Susan Wiggins, Executive Director at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI